RMI website: (www.responsiblemineralsinitiative.org)
Training and guidance, template, Responsible Minerals Assurance Process conformant smelter list.

Introduction

This Conflict Minerals Reporting Template (Template) is a free, standardized reporting template created by the Responsible Minerals Initiative (RMI). The Template facilitates the transfer of information through the supply chain regarding mineral country of origin and smelters and refiners being utilized and supports compliance to legislation*. The template also facilitates the identification of new smelters and refiners to potentially undergo an audit via the Responsible Minerals Assurance Process.**

The CMRT was designed for downstream companies to disclose information about their supply chains up to but not including the smelter. If you are a 3TG smelter or refiner, in accordance with the RMAP protocols, we recommend you enter your own name in the smelter list tab.

When filling out the form, none of the cell entries should start will "=" or "#."

*** In 2010, the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act was passed concerning "conflict minerals" originating from the Democratic Republic of the Congo (DRC) or adjoining countries. The SEC published final rules associated with the disclosure of the source of conflict minerals by U.S. publicly traded companies (see the rules at http://www.sec.gov/rules/final/2012/34-67716.pdf). The rules reference the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, (http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf), which guides suppliers to establish policies, due diligence frameworks and management systems.**
In 2017, Regulation (EU) 2017/821 of the European Parliament and of the European Council of 17 May 2017 was passed concerning supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas (see regulation at https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L:2017:130:FULL&from=EN)
**** See information on the Responsible Minerals Initiative (www.responsiblemineralsinitiative.org).**

Instructions for completing Company Information questions (rows 8 - 22).
Provide comments in ENGLISH only
Note: Entries with (*) are mandatory fields.

1. Insert your company's Legal Name. Please do not use abbreviations. In this field you have the option to add other commercial names, DBAs, etc.

2. Select your company's Declaration Scope. The options for scope are:

A. Company-wide
B. Product (or List of Products)
C. User-Defined

For "Company-wide", the declaration encompasses the entirety of a company's products or product substances produced by the parent company. Therefore if the user is reporting 3TG data at the company level, they will be reporting conflict minerals data on all products they manufacture.

For Scope selection of Product (or List of Products), a link to the worksheet tab for Product List will be displayed. If this scope is chosen, it is mandatory to list the Responder's Product Number of the products covered under the Scope of this Declaration in Column B of the Product List worksheet. It is optional to list the Responder's Product Name in Column C of the Product List worksheet.

For Scope selection of "User Defined", it is mandatory that the user describes the scope to which the 3TG disclosure is applicable. The scope of this class shall be defined in a text field by the supplier and should be easily understood by customers or the receivers of the document. As an example, companies may provide a link to clarifying information.

This field is mandatory.

3. Insert your company's unique identifier number or code (DUNS number, VAT number, customer-specific identifier, etc.)

4. Insert the source for the unique identifier number or code ("DUNS", "VAT", "Customer", etc).

5. Insert your full company address (street, city, state, country, postal code). This field is optional.

6. Insert the name of the person to contact regarding the contents of the declaration information. This field is mandatory.

7. Insert the email address of the contact person. If an email address is not available, state "not available" or "n/a." A blank field may cause an error in form implementation. This field is mandatory.

8. Insert the telephone number for the contact. This field is mandatory.

9. Insert the name of the person who is responsible for the contents of the declaration information. The authorizer may be a different individual than the contact person. It is not correct to use the words "same" or similar identification to provide the name of the authorizer. This field is mandatory.

10. Insert the title for the Authorizing person. This field is optional.

11. Insert the email address of the Authorizing person. If an email address is not available, state "not available" or "n/a." A blank field may cause an error in form implementation. This field is mandatory.

12. Insert the telephone number for the Authorizing person. This field is optional.

13. Please enter the Date of Completion for this form using the format DD-MMM-YYYY. This field is mandatory.

14. As an example, the user may save the file name as: companyname-date.xls (date as YYYY-MM-DD).

Instructions for completing the eight Due Diligence Questions (rows 24 - 71).
Provide answers in ENGLISH only

These eight questions define the usage, origination and sourcing identification for each of the metals. The questions are designed to collect information about the use of 3TG in the company's product(s) to allow for the determination of regulatory applicability. Responses to these questions shall represent the 'Declaration Scope' selected in the company information section.The responses to the questions in this section can be used to determine applicability and completeness of 3TG reporting.

For each of the eight required questions, provide an answer for each metal using the pull down menu selections.The questions in this section must be completed for all 3TG. If the response for a given metal to questions 1 and 2 is positive, then the subsequent questions shall be completed for that metal and the following due diligence questions (A to H) shall be completed about the company's overall due diligence program.

1. This is the first of two questions for which the response is used to determine whether the 3TG is within the scope of conflict minerals reporting requirements. This question relies upon the guidance provided by the SEC in the final rules regarding the determination if a 3TG is "necessary to the functionality or production" of a product. The SEC guidance is based upon the presumption that a company in the supply chain for a product would not intentionally add a 3TG to that product or any of a product's sub-components if that 3TG was not necessary to the product's generally expected function, use, or purpose. Similarly, the guidance presumes that a 3TG would not be necessary to the production of a product unless it was intentionally included in the production process of that product. The response to this question serves to exclude any trace-level contaminants or naturally-occurring by-products such as tin in steel. This question shall be answered for each 3TG.

This question asks if any conflict minerals are used as raw material, component or additive in a product that you manufacture or contract to manufacture (including raw material and components). Impurities from raw materials, components, additives, abrasives, and cutting tools are outside the scope of the survey.

This question shall be answered for each 3TG. Valid responses to this question are either "yes" or "no". This question is mandatory.

Some companies may require substantiation for a "No" answer that should be entered into the Comment Field.

2. This question shall be answered for each 3TG for each the answer to question 1 is "yes." This is the second of two questions for which the response is used to determine whether the 3TG is within the scope of conflict minerals reporting requirements as described in the SECs final rules regarding the determination if a 3TG is necessary to the functionality or production of a product. This question is dependent upon the question and response to Question 1. This question is intended to identify 3TGs which are intentionally added or included in the manufacturing process of a product where some amount of the 3TG remains in the finished product. This includes 3TGs which may not have been intended to become part of the final product and may not be necessary to the functionality of the product but are only present as residuals of the manufacturing process. In many cases, the manufacturer may have attempted to remove or facilitate consumption of the 3TG during the manufacturing process, however, some amount of the 3TG remains. Should the 3TG, which is added or included during the manufacturing process, be completely removed such that none of the 3TG remains upon the completion of that process, the response to this question would be no. **This question shall be answered for each 3TG. Valid answers to this question are either "yes" or "no". This question is mandatory.**	
3. This is a declaration that any portion of the 3TGs contained in a product or multiple products originates from the DRC or an adjoining country (covered countries). The answer to this question should be "yes" if any smelter in the supply chain sources from the covered countries, even if those smelters are on the RMI conformant smelter and refiner list. For more information, see RMI's due diligence guidance on conflict minerals here: http://www.responsiblemineralsinitiative.org/training-and-resources/publications-and-guidance/. **The answer to this question shall be "yes", "no", or "unknown". It is recommended to substantiate a "Yes" answer in the comments section.** **This question is mandatory for a specific metal if the response to Question 1 and 2 is "Yes" for that metal.**	
4. This is a declaration that any portion of the 3TGs contained in a product or multiple products originates from conflict-affected and high-risk areas (CAHRAs). **The answer to this question should be "yes" if any smelter in the supply chain sources from covered countries or CAHRAs, even if those smelters are on the RMI conformant smelter and refiner list. For more information, see RMI's due diligence guidance on conflict minerals here: http://www.responsiblemineralsinitiative.org/training-and-resources/publications-and-guidance/.** **The answer to this question shall be yes, no or unknown. It is recommended to substantiate a "yes" answer in the comments section. This question is mandatory for a specific metal if the response to Question 1 and 2 is "yes" for that metal.**	
5. This is a declaration that identifies whether 3TGs contained in the product(s) necessary to the functionality of that product(s) originate from recycled or scrap sources. **The answer to this question shall be "yes", "no", or "unknown". This question is mandatory for a specific metal if the response to Question 1 and 2 is "Yes" for that metal.** **A "Yes" answer means that 100% of the 3TG comes from recycled or scrap sources. A "No" answer means that some of the 3TG does not come from recycled or scrap sources. An "Unknown" answer means that the user does not know whether or not 100% of the 3TG comes from recycled or scrap sources.**	
6. This is a question to determine whether a company has received conflict minerals disclosures from all direct suppliers reasonably believed to be providing 3TGs contained in the products covered by the scope of this declaration. Permissible responses to this question are: **- 100%** **- Greater than 90%** **- Greater than 75%** **- Greater than 50%** **- 50% or less** **- None** **This question is mandatory for a specific metal if the response to Question 1 and 2 is "Yes" for that metal.**	
7. This question verifies if the supplier has reason to believe they have identified all of the smelters providing 3TGs in the products covered by this declaration. The answer to this question shall be "Yes" or "No", along with a comment in certain cases, e.g. list of smelters. **This question is mandatory for a specific metal if the response to Question 1 and 2 is "Yes" for that metal.**	
8. This question verifies that all of the smelters identified to be providing any of the 3TGs contained in the products covered by the scope of this declaration have been reported in this declaration. The answer to this question shall be "yes" or "no" along with a comment in certain cases, e.g. list of smelters. This question is mandatory for a specific metal if the response to Question 1 and 2 is "Yes" for that metal.	
Provide comments in the Comment sections as required to clarify your responses.	
Instructions for completing Questions A. – H. (rows 75 - 89). Questions A. through H. are mandatory if the both of responses to Question 1 and 2 are "Yes" for any metal. **Provide answers in ENGLISH only**	
The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-affected and High-risk Areas (OECD Guidance) defines "Due Diligence" as "an on-going, proactive and reactive process through which companies can ensure that they respect human rights and do not contribute to conflict". Due diligence should be an integral part of your company's overall conflict free sourcing strategy. Questions A. thru H. are designed to assess your company's conflict-free minerals sourcing due diligence activities. Responses to these questions shall represent the full scope of your company's activities and shall not be limited to the 'Declaration Scope' selected in the company information section.	
A. This is a declaration to disclose whether a company has a responsible minerals sourcing policy. The answer to this question shall be "yes" or "no." Comments shall be captured in a question comment field. **This question is mandatory.**	
B. This is a declaration to disclose whether a company's responsible minerals sourcing policy is available on the company website. The answer to this question shall be "yes" or "no." If "Yes" the user shall specify the URL in a question comment field. **This question is mandatory.**	
C. This is a declaration to determine whether a company requires their direct suppliers to source 3TG from validated smelters. The answer to this question shall be "yes" or "no." Comments should be captured in a question comment field. **This question is mandatory.**	
D. Please answer "yes" or "no" to disclose whether your company has implemented responsible sourcing due diligence measures. This declaration is not intended to provide the details of a company's due diligence measures - just that a company has implemented due diligence measures. The aspects of acceptable due diligence measures shall be determined by the requestor and supplier. **Examples of due diligence measures may include: communicating and incorporating into contracts (where possible) your expectations to suppliers on responsible mineral supply chain; identifying and assessing risks in the supply chain; designing and implementing a strategy to respond to identified risks; verifying your direct supplier's compliance to its responsible minerals sourcing policy, etc. These due diligence measure examples are consistent with the guidelines included in the internationally recognized OECD Guidance.** **This question is mandatory.**	
E. This is a question to disclose whether a company requests their supplier to fill out a conflict minerals declaration. Acceptable answers are listed below, in certain cases further explanation may be required, i.e., to provide the format used for collecting information. If the answer is "Yes," using other format the user shall provide a comment in a question comment field. Permissible responses to this question are: **- Yes, in conformance with IPC-1755 [e.g., CMRT]** **- Yes, using other format (describe)** **- No** **This question is mandatory.**	
F. Please answer "Yes" or "No". In the comments section, you can provide additional information on your approach. Examples could be: **"3rd party audit" - on-site audits of your suppliers conducted by independent third parties.** **"Documentation review only" - a reviewof supplier submitted records and documentation conducted by independent third parties and, or your company personnel.** **"Internal audit" - on-site audits of your suppliers conducted by your company personnel.** **This question is mandatory.**	
G. This is a question to disclose whether a company's review process includes corrective action management. The answer to this question shall be "yes" or "no." Comments shall be captured in a question comment field. **This question is mandatory.**	

H. This is a question to disclose whether a company is subject to the SEC rule, the EU regulation, or both. The answer to this question shall be "yes, with the SEC", "yes, with the EU", "yes with the SEC and the EU" or "no." Comments shall be captured in a question comment field. This question is mandatory. For more information on the SEC rule, please refer to www.sec.gov. For more information on the EU regulation, please refer to https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R0821&from=EN.

Instructions for completing the Smelter List Tab.
Provide answers in ENGLISH only

Note: Columns with (*) are mandatory fields

This template allows for smelter identification using the Smelter Look-up. Columns B, and C must be completed in order from left to right to utilize the Smelter Look-up feature.
Use a separate line for each metal/smelter/country combination.

1. Smelter Identification Input Column - If you know the Smelter Identification Number, input the number in Column A (columns B, C, E, F, G, I, and J will auto-populate). Column A does not autopopulate.

2. Metal (*) - Use the pull down menu to select the metal for which you are entering smelter information. This field is mandatory.

3. Smelter Look-up (*) - Select from dropdown. This is the list of known smelters as of template release date. If smelter is not listed select 'Smelter Not Listed'. This will allow you to enter the name of the smelter in Column D. If you do not know the name or location of the smelter, select 'Smelter Not Yet Identified.' For this option, columns D and E will autopopulate to say, 'unknown.' This field is mandatory.

4. Smelter Name (1)- Fill in smelter name if you selected "Smelter Not Listed" in column C. This field will auto-populate when a smelter name in selected in Column C. This field is mandatory.

5. Smelter Country (*) – This field will auto-populate when a smelter name is selected in column C. If you selected "Smelter Not Listed" in column C, use the pull down menu to select the country location of the smelter. This field is mandatory.

6. Smelter Identification - This is a unique identifier assigned to a smelter or refiner according to an established smelter and refinery identification system. It is expected that multiple names or aliases could be used to describe a single smelter or refiner and therefore multiple names or aliases could be associated to a single 'Smelter ID'.

7. Source of Smelter Identification Number - This is the source of the Smelter Identification Number entered in Column F. If a smelter name was selected in Column C using the dropdown box, this field will auto-populate.

8. Smelter Street - Provide the street name on which the smelter is located. This field is optional.

9. Smelter City – Provide the city name of where the smelter is located. This field is optional.

10. Smelter Location: State/Province, if applicable – Provide the state or province where the smelter is located. This field is optional.

11. Smelter Contact Name – The Conflict Minerals Reporting Template (CMRT) is circulated among companies in the requesting company's supply chain to ensure compliance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the U.S. Securities and Exchange Commission Final Rule on conflict minerals.

If the template is circulated in a country where laws protecting personal information exist, sharing personal contact information in the CMRT may violate related regulations. Therefore, it is recommended that the requesting company take precautions such as obtaining the contact person's permission to share the information with other companies in the supply chain when completing "Smelter Contact Name" and the "Smelter Contact Email" columns.

If you have permission to share this information, please fill in the name of the Smelter Facility Contact person who you worked with.

12. Smelter Contact Email – Fill in the email address of the Smelter Facility contact person who was identified as the Smelter Contact Name. Example: John.Smith@SmelterXXX.com. Please review the instructions for Smelter Contact Name before completing this field.

13. Name of Mine(s) - This field allows a company to define the actual mines being used by the smelter. Please enter the actual mine names if known. If 100% of the smelter's feedstock originates from recycled or scrap sources, enter "Recycled" or "Scrap" in place of the name of the mine and answer "Yes" in Column P.

"RCOI confirmed as per RMI" may be an acceptable answer to this question.

14. Location (Country) of Mine(s) - This is a free form text field that allows a company to define the location of the mines being used by the smelter. Please enter the country of the mine(s). If the country of origin is not known, enter "Unknown". If 100% of the smelter's feedstock originates from recycled or scrap sources, enter "Recycled" or "Scrap" in place of the country of origin. This field is optional.

"RCOI confirmed as per RMI" may be an acceptable answer to this question.

15. Indicates whether the smelter solely obtains inputs for its smelting process(es) from recycled or scrap sources. This question is optional. Permissible responses to this question are:

- Yes
- No
- Unknown

16. Comments – free form text field to enter any comments concerning the smelter. Example: smelter is being acquired by Company YYY

TERMS AND CONDITIONS

RBA makes no representations or warranties with respect to the List or any Tool. The List and Tools are provided on an "AS IS" and on an "AS AVAILABLE" basis. RBA hereby disclaims all warranties of any nature, express, implied or otherwise, or arising from trade or custom, including, without limitation, any implied warranties of merchantability, non-infringement, quality, title, fitness for a particular purpose, completeness or accuracy.

To the fullest extent permitted by applicable laws, RBA renounces any liability for any losses, expenses or damages of any nature, including, without limitation, special, incidental, punitive, direct, indirect or consequential damages or lost income or profits, resulting from or arising out of the User's use of the List or any Tool, whether arising in tort, contract, statute, or otherwise, even if shown that they were advised of the possibility of such damages.

In consideration for access and use of the List and/or any Tool, THE USER hereby agrees to and does (a) release and forever discharge RBA, as well as their respective officers, directors, agents, employees, volunteers, representatives, contractors, successors, and assigns, from any and all claims, actions, losses, suits, damages, judgments, levies, and executions, which the User has ever had, has, or ever can, shall, or may have or claim to have against RBA, as well as their respective officers, directors, agents, employees, volunteers, representatives, contractors, successors, and assigns, resulting from or arising out of the List or any Tool or use thereof, and agrees to (b) indemnify, defend and hold harmless RBA, as well as their respective officers, directors, agents, employees, volunteers, representatives, contractors, successors, and assigns, from any and all claims, actions, losses, suits, damages, judgments, levies, and executions resulting from or arising out of the USER'S use of the List or any Tool.

If any part of any provision of these Terms and Conditions shall be invalid or unenforceable under applicable law, said part shall be deemed ineffective to the extent of such invalidity or unenforceability only, without in any way affecting the remaining parts of said provision or the remaining provisions of these Terms and Conditions.

© 2025 Responsible Minerals Initiative. All rights reserved.

Return to declaration tab

Revision 6.5 April 25, 2025