



Responsible Minerals Initiative
Formerly the Conflict-Free Sourcing Initiative

1737 King Street
Suite 330
Alexandria, VA 22314

ResponsibleMineralsInitiative.org

August 21, 2018

Dear Ferdinand,

We are periodically contacted by smelters that have questions regarding RMI's due diligence requirements for sourcing minerals utilizing upstream assurance mechanisms, such as Better Sourcing Program (BSP). We have summarized this information below.

RMI encourages companies to conduct minerals due diligence in line with the OECD Due Diligence Guidance. While the responsibility for due diligence remains the responsibility of individual companies, companies may utilize the services and resources of traceability and due diligence systems ("upstream assurance mechanisms") and service providers to support their efforts. Mechanisms based on internationally accepted frameworks, such as the OECD Due Diligence Guidance, help promote and sustain responsible minerals trade.

The RMI welcomes the opportunity to monitor and support BSP as one of the operational upstream assurance mechanisms in the African Great Lakes Region. BSP was designed to encourage a robust and transparent approach to responsible production/sourcing of minerals which helps buyers identify and support responsible mineral production and helps sellers reach international markets.

Guiding note for smelters

RMI's expectations are in furtherance of the [OECD Due Diligence Guidance](#). Due diligence focuses on the processes in place for companies to identify, prevent, and mitigate risks based on available information, and make improvements over time. The RMAP 3TG Standards recognize that due diligence is the requirement of the smelter, however smelters may use traceability and due diligence systems and service providers to carry out parts of their due diligence. Some examples of such systems are listed here:

<http://www.responsiblemineralsinitiative.org/training-and-resources/complementary-programs/>

Smelters utilizing an upstream assurance mechanism, such as BSP, are expected to:

1. Understand the scope of activities of the mechanism and any gaps between the mechanism's activities and the requirements of the OECD Due Diligence Guidance and maintain associated records
2. Review information generated by the mechanism to assess risks
3. Where possible, participate in the mechanism to mitigate identified risks

Upstream assurance mechanisms should be independently assessed and found aligned with the OECD Due Diligence Guidance or, if not, evidence should be provided to the RMAP auditor that the upstream assurance mechanism is aligned with the OECD Due Diligence Guidance.

Further detail can be found in the following revised RMAP Standard and Workbook sections regarding RMAP expectations for upstream assurance mechanisms:



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- Tin/Tantalum: Section V (page 6)
- Tungsten: Section V (page 6)
- Gold: Section V (page 6)
- High-Risk Workbook: “Overview” and “High-risk questions” tab lines 68-87

Current practice

Within participating RMAP smelters or refiners, we are aware of two (2) facilities that have previously or are currently utilizing BSP for purposes of their due diligence activities, covering both cassiterite/tin and coltan/tantalum. These companies are included in the list of [RMAP Conformant Smelters & Refiners](#). We are also aware that BSP is supporting due diligence and traceability for gold supply chains originating in the African Great Lakes Region.

We appreciate the opportunity to conduct visits of BSP validated sites in the DRC and Rwanda and participate in discussions with BSP stakeholders in February 2018. This was an excellent opportunity for RMI to observe BSP traceability and due diligence process, and to further understand relevant risks and opportunities in mineral supply chains and the role BSP is playing in these areas.

For smelters or refiners that are seeking to learn about the linkages between RMAP and upstream assurance mechanisms, such as BSP, we are available for further clarifications. RMI also hosts free online training on upstream mechanisms on our [eLearning Academy](#) and welcomes stakeholders to join RMI’s Monthly Multi-Stakeholder Call to learn more through direct dialogue. Please do not hesitate to reach out with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Butler'.

Leah Butler

Vice President

Responsible Business Alliance

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