

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

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**BEIJING EASPRING MATERIAL TECHNOLOGY**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: CHINA [SOR URL](#) Membership: CCCMC, RCI

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? ○ ● ●
- 4. Described transparency and info collection? ○ ● ●
- 5. Control systems over mineral supply chain? ○ ● ●
- 6. Control system strengthened DD? ○ ● ●
- 7. Record keeping system described? ○ ● ●
- 8. Explained methods for identifying all suppliers? ○ ● ●
- 9. Explained methods for sharing information? ○ ● ●
- 10. Disclosure on payments to governments? ○ ● ●
- 11. Conflict-free sourcing policy? ○ ● ●
- 12. Covered tin/tantalum materials? ○ ● ●
- 13. Covered the DRC and adjoining countries? ○ ● ●
- 14. Part of standard operating procedures and training? ○ ● ●
- 15. Effective date? ○ ● ●
- 16. Shared with suppliers? ○ ● ●
- 17. Policy in English? ○ ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports? ○ ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**CHAMBISHI METALS PLC**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: ZAMBIA [SOR URL](#) Membership: LME

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? ○ ● ●
- 4. Described transparency and info collection? ○ ● ●
- 5. Control systems over mineral supply chain? ○ ● ●
- 6. Control system strengthened DD? ○ ● ●
- 7. Record keeping system described? ○ ● ●
- 8. Explained methods for identifying all suppliers? ○ ● ●
- 9. Explained methods for sharing information? ○ ● ●
- 10. Disclosure on payments to governments? ○ ● ●
- 11. Conflict-free sourcing policy? ○ ● ●
- 12. Covered tin/tantalum materials? ○ ● ●
- 13. Covered the DRC and adjoining countries? ○ ● ●
- 14. Part of standard operating procedures and training? ○ ● ●
- 15. Effective date? ○ ● ●
- 16. Shared with suppliers? ○ ● ●
- 17. Policy in English? ○ ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports? ○ ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**CHENGDU HUAZE COBALT&NICKEL MATERIAL CO., LTD**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: CHINA [SOR URL](#) Membership: CCCMC, RCI

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? ○ ● ●
- 4. Described transparency and info collection? ○ ● ●
- 5. Control systems over mineral supply chain? ○ ● ●
- 6. Control system strengthened DD? ○ ● ●
- 7. Record keeping system described? ○ ● ●
- 8. Explained methods for identifying all suppliers? ○ ● ●
- 9. Explained methods for sharing information? ○ ● ●
- 10. Disclosure on payments to governments? ○ ● ●
- 11. Conflict-free sourcing policy? ○ ● ●
- 12. Covered tin/tantalum materials? ○ ● ●
- 13. Covered the DRC and adjoining countries? ○ ● ●
- 14. Part of standard operating procedures and training? ○ ● ●
- 15. Effective date? ○ ● ●
- 16. Shared with suppliers? ○ ● ●
- 17. Policy in English? ○ ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports? ○ ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**CHINA MOLYBDENUM CO. LTD FORMER OWNER: (FREEPORTMCMORAN)**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: CHINA [SOR URL](#) Membership: CCCMC, RCI

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection?<sup>o</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**CTT - COMPAGNIE DE TIFNOUT TIRANIMINE**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: MOROCCO [SOR URL](#) Membership: LME

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection?<sup>o</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**EURASIAN NATURAL RESOURCES GROUP**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: DRC [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? ○ ● ●
- 4. Described transparency and info collection? ○ ● ●
- 5. Control systems over mineral supply chain? ○ ● ●
- 6. Control system strengthened DD? ○ ● ●
- 7. Record keeping system described? ○ ● ●
- 8. Explained methods for identifying all suppliers? ○ ● ●
- 9. Explained methods for sharing information? ○ ● ●
- 10. Disclosure on payments to governments? ○ ● ●
- 11. Conflict-free sourcing policy? ○ ● ●
- 12. Covered tin/tantalum materials? ○ ● ●
- 13. Covered the DRC and adjoining countries? ○ ● ●
- 14. Part of standard operating procedures and training? ○ ● ●
- 15. Effective date? ○ ● ●
- 16. Shared with suppliers? ○ ● ●
- 17. Policy in English? ○ ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports? ○ ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**FREPORT COBALT OY (KOKKOLA)**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: FINLAND [SOR URL](#) Membership: LME

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? ○ ● ●
- 4. Described transparency and info collection? ○ ● ●
- 5. Control systems over mineral supply chain? ○ ● ●
- 6. Control system strengthened DD? ○ ● ●
- 7. Record keeping system described? ○ ● ●
- 8. Explained methods for identifying all suppliers? ○ ● ●
- 9. Explained methods for sharing information? ○ ● ●
- 10. Disclosure on payments to governments? ○ ● ●
- 11. Conflict-free sourcing policy? ○ ● ●
- 12. Covered tin/tantalum materials? ○ ● ●
- 13. Covered the DRC and adjoining countries? ○ ● ●
- 14. Part of standard operating procedures and training? ○ ● ●
- 15. Effective date? ○ ● ●
- 16. Shared with suppliers? ○ ● ●
- 17. Policy in English? ○ ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports? ○ ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GANZHOU YI HAO UMICORE INDUSTRY CO.**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: CHINA [SOR URL](#) Membership: LME, CCCMC, RCI

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection?<sup>o</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 11/17 (65%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 6/9 (67%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GLENCORE XSTRATA**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: SWITZERLAND [SOR URL](#) Membership: CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? ○ ● ●
- 4. Described transparency and info collection? ○ ● ●
- 5. Control systems over mineral supply chain? ○ ● ●
- 6. Control system strengthened DD? ○ ● ●
- 7. Record keeping system described? ○ ● ●
- 8. Explained methods for identifying all suppliers? ○ ● ●
- 9. Explained methods for sharing information? ○ ● ●
- 10. Disclosure on payments to governments? ○ ● ●
- 11. Conflict-free sourcing policy? ○ ● ●
- 12. Covered tin/tantalum materials? ○ ● ●
- 13. Covered the DRC and adjoining countries? ○ ● ●
- 14. Part of standard operating procedures and training? ○ ● ●
- 15. Effective date? ○ ● ●
- 16. Shared with suppliers? ○ ● ●
- 17. Policy in English? ○ ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports? ○ ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GLOBAL TUNGSTEN & POWDERS CORP.**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: US [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? ○ ● ● ●
- 4. Described transparency and info collection? ○ ● ● ●
- 5. Control systems over mineral supply chain? ○ ● ● ●
- 6. Control system strengthened DD? ○ ● ● ●
- 7. Record keeping system described? ○ ● ● ●
- 8. Explained methods for identifying all suppliers? ○ ● ● ●
- 9. Explained methods for sharing information? ○ ● ● ●
- 10. Disclosure on payments to governments? ○ ● ● ●
- 11. Conflict-free sourcing policy? ○ ● ● ●
- 12. Covered tin/tantalum materials? ○ ● ● ●
- 13. Covered the DRC and adjoining countries? ○ ● ● ●
- 14. Part of standard operating procedures and training? ○ ● ● ●
- 15. Effective date? ○ ● ● ●
- 16. Shared with suppliers? ○ ● ● ●
- 17. Policy in English? ○ ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports? ○ ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GROUPE FORREST INTERNATIONAL S.A. (ENTREPRISE GNRALE MALTA FORREST)**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: DRC [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection?<sup>o</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**HANRUI COBALT**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: CHINA [SOR URL](#) Membership: CCCMC, RCI

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? ○ ● ●
- 4. Described transparency and info collection? ○ ● ●
- 5. Control systems over mineral supply chain? ○ ● ●
- 6. Control system strengthened DD? ○ ● ●
- 7. Record keeping system described? ○ ● ●
- 8. Explained methods for identifying all suppliers? ○ ● ●
- 9. Explained methods for sharing information? ○ ● ●
- 10. Disclosure on payments to governments? ○ ● ●
- 11. Conflict-free sourcing policy? ○ ● ●
- 12. Covered tin/tantalum materials? ○ ● ●
- 13. Covered the DRC and adjoining countries? ○ ● ●
- 14. Part of standard operating procedures and training? ○ ● ●
- 15. Effective date? ○ ● ●
- 16. Shared with suppliers? ○ ● ●
- 17. Policy in English? ○ ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports? ○ ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**HUNAN YACHENG NEW MATERIALS DEVELOPMENT CO., LTD.**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: CHINA [SOR URL](#) Membership: CCCMC, RCI

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection?<sup>o</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**JIANGSU COBALT NICKEL METAL (KLK)**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: CHINA [SOR URL](#) Membership: LME, CCCMC, RCI

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? ○ ● ●
- 4. Described transparency and info collection? ○ ● ●
- 5. Control systems over mineral supply chain? ○ ● ●
- 6. Control system strengthened DD? ○ ● ●
- 7. Record keeping system described? ○ ● ●
- 8. Explained methods for identifying all suppliers? ○ ● ●
- 9. Explained methods for sharing information? ○ ● ●
- 10. Disclosure on payments to governments? ○ ● ●
- 11. Conflict-free sourcing policy? ○ ● ●
- 12. Covered tin/tantalum materials? ○ ● ●
- 13. Covered the DRC and adjoining countries? ○ ● ●
- 14. Part of standard operating procedures and training? ○ ● ●
- 15. Effective date? ○ ● ●
- 16. Shared with suppliers? ○ ● ●
- 17. Policy in English? ○ ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports? ○ ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**JIANGSU XIONGFENG TECHNOLOGY CO., LTD.**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: CHINA [SOR URL](#) Membership: CCCMC, RCI

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? ○ ● ●
- 4. Described transparency and info collection? ○ ● ●
- 5. Control systems over mineral supply chain? ○ ● ●
- 6. Control system strengthened DD? ○ ● ●
- 7. Record keeping system described? ○ ● ●
- 8. Explained methods for identifying all suppliers? ○ ● ●
- 9. Explained methods for sharing information? ○ ● ●
- 10. Disclosure on payments to governments? ○ ● ●
- 11. Conflict-free sourcing policy? ○ ● ●
- 12. Covered tin/tantalum materials? ○ ● ●
- 13. Covered the DRC and adjoining countries? ○ ● ●
- 14. Part of standard operating procedures and training? ○ ● ●
- 15. Effective date? ○ ● ●
- 16. Shared with suppliers? ○ ● ●
- 17. Policy in English? ○ ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports? ○ ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**JIANGXI JIANGWU COBALT CO., LTD.**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: CHINA [SOR URL](#) Membership: CCCMC, RCI

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection?<sup>o</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 5/17 (29%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

JINCHUAN GROUP CO LTD

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: CHINA [SOR URL](#) Membership: LME, CCCMC, RCI

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection?<sup>o</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**JINCHUAN NONFERROUS METALS CORP.**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: CHINA [SOR URL](#) Membership: LME, CCCMC, RCI

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? ○ ● ●
- 4. Described transparency and info collection? ○ ● ●
- 5. Control systems over mineral supply chain? ○ ● ●
- 6. Control system strengthened DD? ○ ● ●
- 7. Record keeping system described? ○ ● ●
- 8. Explained methods for identifying all suppliers? ○ ● ●
- 9. Explained methods for sharing information? ○ ● ●
- 10. Disclosure on payments to governments? ○ ● ●
- 11. Conflict-free sourcing policy? ○ ● ●
- 12. Covered tin/tantalum materials? ○ ● ●
- 13. Covered the DRC and adjoining countries? ○ ● ●
- 14. Part of standard operating procedures and training? ○ ● ●
- 15. Effective date? ○ ● ●
- 16. Shared with suppliers? ○ ● ●
- 17. Policy in English? ○ ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports? ○ ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**KASESE COBALT COMPANY LIMITED**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: UGANDA [SOR URL](#) Membership: LME

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? ○ ● ●
- 4. Described transparency and info collection? ○ ● ●
- 5. Control systems over mineral supply chain? ○ ● ●
- 6. Control system strengthened DD? ○ ● ●
- 7. Record keeping system described? ○ ● ●
- 8. Explained methods for identifying all suppliers? ○ ● ●
- 9. Explained methods for sharing information? ○ ● ●
- 10. Disclosure on payments to governments? ○ ● ●
- 11. Conflict-free sourcing policy? ○ ● ●
- 12. Covered tin/tantalum materials? ○ ● ●
- 13. Covered the DRC and adjoining countries? ○ ● ●
- 14. Part of standard operating procedures and training? ○ ● ●
- 15. Effective date? ○ ● ●
- 16. Shared with suppliers? ○ ● ●
- 17. Policy in English? ○ ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports? ○ ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**LANZHOU JINCHUAN ADVANCED MATERIALS TECHNOLOGY CO., LTD.**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: CHINA [SOR URL](#) Membership: CCCMC, RCI

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? ○ ● ●
- 4. Described transparency and info collection? ○ ● ●
- 5. Control systems over mineral supply chain? ○ ● ●
- 6. Control system strengthened DD? ○ ● ●
- 7. Record keeping system described? ○ ● ●
- 8. Explained methods for identifying all suppliers? ○ ● ●
- 9. Explained methods for sharing information? ○ ● ●
- 10. Disclosure on payments to governments? ○ ● ●
- 11. Conflict-free sourcing policy? ○ ● ●
- 12. Covered tin/tantalum materials? ○ ● ●
- 13. Covered the DRC and adjoining countries? ○ ● ●
- 14. Part of standard operating procedures and training? ○ ● ●
- 15. Effective date? ○ ● ●
- 16. Shared with suppliers? ○ ● ●
- 17. Policy in English? ○ ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports? ○ ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**MOPANI COPPER MINES**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: ZAMBIA [SOR URL](#) Membership: LME

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? ○ ● ●
- 4. Described transparency and info collection? ○ ● ●
- 5. Control systems over mineral supply chain? ○ ● ●
- 6. Control system strengthened DD? ○ ● ●
- 7. Record keeping system described? ○ ● ●
- 8. Explained methods for identifying all suppliers? ○ ● ●
- 9. Explained methods for sharing information? ○ ● ●
- 10. Disclosure on payments to governments? ○ ● ●
- 11. Conflict-free sourcing policy? ○ ● ●
- 12. Covered tin/tantalum materials? ○ ● ●
- 13. Covered the DRC and adjoining countries? ○ ● ●
- 14. Part of standard operating procedures and training? ○ ● ●
- 15. Effective date? ○ ● ●
- 16. Shared with suppliers? ○ ● ●
- 17. Policy in English? ○ ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports? ○ ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**NANTONG XINWEI NICKEL & COBALT HIGHTECH DEVELOPMENT CO., LTD.**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: CHINA [SOR URL](#) Membership: CCCMC, RCI

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? ○ ● ●
- 4. Described transparency and info collection? ○ ● ●
- 5. Control systems over mineral supply chain? ○ ● ●
- 6. Control system strengthened DD? ○ ● ●
- 7. Record keeping system described? ○ ● ●
- 8. Explained methods for identifying all suppliers? ○ ● ●
- 9. Explained methods for sharing information? ○ ● ●
- 10. Disclosure on payments to governments? ○ ● ●
- 11. Conflict-free sourcing policy? ○ ● ●
- 12. Covered tin/tantalum materials? ○ ● ●
- 13. Covered the DRC and adjoining countries? ○ ● ●
- 14. Part of standard operating procedures and training? ○ ● ●
- 15. Effective date? ○ ● ●
- 16. Shared with suppliers? ○ ● ●
- 17. Policy in English? ○ ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports? ○ ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**NICOMET INDUSTRIES LTD.**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: INDIA [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? ○ ● ●
- 4. Described transparency and info collection? ○ ● ●
- 5. Control systems over mineral supply chain? ○ ● ●
- 6. Control system strengthened DD? ○ ● ●
- 7. Record keeping system described? ○ ● ●
- 8. Explained methods for identifying all suppliers? ○ ● ●
- 9. Explained methods for sharing information? ○ ● ●
- 10. Disclosure on payments to governments? ○ ● ●
- 11. Conflict-free sourcing policy? ○ ● ●
- 12. Covered tin/tantalum materials? ○ ● ●
- 13. Covered the DRC and adjoining countries? ○ ● ●
- 14. Part of standard operating procedures and training? ○ ● ●
- 15. Effective date? ○ ● ●
- 16. Shared with suppliers? ○ ● ●
- 17. Policy in English? ○ ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports? ○ ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PJSC MMC NORILSK NICKEL**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: RUSSIA [SOR URL](#) Membership: LME

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection?<sup>o</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**QUEENSLAND NICKEL PL**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: AUSTRALIA [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? ○ ● ●
- 4. Described transparency and info collection? ○ ● ●
- 5. Control systems over mineral supply chain? ○ ● ●
- 6. Control system strengthened DD? ○ ● ●
- 7. Record keeping system described? ○ ● ●
- 8. Explained methods for identifying all suppliers? ○ ● ●
- 9. Explained methods for sharing information? ○ ● ●
- 10. Disclosure on payments to governments? ○ ● ●
- 11. Conflict-free sourcing policy? ○ ● ●
- 12. Covered tin/tantalum materials? ○ ● ●
- 13. Covered the DRC and adjoining countries? ○ ● ●
- 14. Part of standard operating procedures and training? ○ ● ●
- 15. Effective date? ○ ● ●
- 16. Shared with suppliers? ○ ● ●
- 17. Policy in English? ○ ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports? ○ ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**RAMU NICO MANAGEMENT (MCC) LIMITED**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: CHINA [SOR URL](#) Membership: CCCMC, RCI

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection?<sup>o</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SHAANXI HUAZE NICKEL & COBALT METAL**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: CHINA [SOR URL](#) Membership: CCCMC, RCI

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? ○ ● ●
- 4. Described transparency and info collection? ○ ● ●
- 5. Control systems over mineral supply chain? ○ ● ●
- 6. Control system strengthened DD? ○ ● ●
- 7. Record keeping system described? ○ ● ●
- 8. Explained methods for identifying all suppliers? ○ ● ●
- 9. Explained methods for sharing information? ○ ● ●
- 10. Disclosure on payments to governments? ○ ● ●
- 11. Conflict-free sourcing policy? ○ ● ●
- 12. Covered tin/tantalum materials? ○ ● ●
- 13. Covered the DRC and adjoining countries? ○ ● ●
- 14. Part of standard operating procedures and training? ○ ● ●
- 15. Effective date? ○ ● ●
- 16. Shared with suppliers? ○ ● ●
- 17. Policy in English? ○ ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports? ○ ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SHALINA RESOURCES LTD**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: DRC [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection?<sup>o</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SHANDONG JINLING MINING**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: CHINA [SOR URL](#) Membership: CCCMC, RCI

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? ○ ● ●
- 4. Described transparency and info collection? ○ ● ●
- 5. Control systems over mineral supply chain? ○ ● ●
- 6. Control system strengthened DD? ○ ● ●
- 7. Record keeping system described? ○ ● ●
- 8. Explained methods for identifying all suppliers? ○ ● ●
- 9. Explained methods for sharing information? ○ ● ●
- 10. Disclosure on payments to governments? ○ ● ●
- 11. Conflict-free sourcing policy? ○ ● ●
- 12. Covered tin/tantalum materials? ○ ● ●
- 13. Covered the DRC and adjoining countries? ○ ● ●
- 14. Part of standard operating procedures and training? ○ ● ●
- 15. Effective date? ○ ● ●
- 16. Shared with suppliers? ○ ● ●
- 17. Policy in English? ○ ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports? ○ ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SHENZHEN GREEN ECO-MANUFACTURE HI-TECH CO., LTD.,**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: CHINA [SOR URL](#) Membership: CCCMC, RCI

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? ○ ● ●
- 4. Described transparency and info collection? ○ ● ●
- 5. Control systems over mineral supply chain? ○ ● ●
- 6. Control system strengthened DD? ○ ● ●
- 7. Record keeping system described? ○ ● ●
- 8. Explained methods for identifying all suppliers? ○ ● ●
- 9. Explained methods for sharing information? ○ ● ●
- 10. Disclosure on payments to governments? ○ ● ●
- 11. Conflict-free sourcing policy? ○ ● ●
- 12. Covered tin/tantalum materials? ○ ● ●
- 13. Covered the DRC and adjoining countries? ○ ● ●
- 14. Part of standard operating procedures and training? ○ ● ●
- 15. Effective date? ○ ● ●
- 16. Shared with suppliers? ○ ● ●
- 17. Policy in English? ○ ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports? ○ ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SHERRITT INTERNATIONAL**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: CANADA [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? ○ ● ●
- 4. Described transparency and info collection? ○ ● ●
- 5. Control systems over mineral supply chain? ○ ● ●
- 6. Control system strengthened DD? ○ ● ●
- 7. Record keeping system described? ○ ● ●
- 8. Explained methods for identifying all suppliers? ○ ● ●
- 9. Explained methods for sharing information? ○ ● ●
- 10. Disclosure on payments to governments? ○ ● ●
- 11. Conflict-free sourcing policy? ○ ● ●
- 12. Covered tin/tantalum materials? ○ ● ●
- 13. Covered the DRC and adjoining countries? ○ ● ●
- 14. Part of standard operating procedures and training? ○ ● ●
- 15. Effective date? ○ ● ●
- 16. Shared with suppliers? ○ ● ●
- 17. Policy in English? ○ ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports? ○ ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SICHUAN NI AND CO GUORUN NEW MATERIALS**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: CHINA [SOR URL](#) Membership: LME, CCCMC, RCI

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? ○ ● ●
- 4. Described transparency and info collection? ○ ● ●
- 5. Control systems over mineral supply chain? ○ ● ●
- 6. Control system strengthened DD? ○ ● ●
- 7. Record keeping system described? ○ ● ●
- 8. Explained methods for identifying all suppliers? ○ ● ●
- 9. Explained methods for sharing information? ○ ● ●
- 10. Disclosure on payments to governments? ○ ● ●
- 11. Conflict-free sourcing policy? ○ ● ●
- 12. Covered tin/tantalum materials? ○ ● ●
- 13. Covered the DRC and adjoining countries? ○ ● ●
- 14. Part of standard operating procedures and training? ○ ● ●
- 15. Effective date? ○ ● ●
- 16. Shared with suppliers? ○ ● ●
- 17. Policy in English? ○ ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports? ○ ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SUMITOMO METAL MINING CO., LTD.**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: JAPAN [SOR URL](#) Membership: LME

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? ○ ● ●
- 4. Described transparency and info collection? ○ ● ●
- 5. Control systems over mineral supply chain? ○ ● ●
- 6. Control system strengthened DD? ○ ● ●
- 7. Record keeping system described? ○ ● ●
- 8. Explained methods for identifying all suppliers? ○ ● ●
- 9. Explained methods for sharing information? ○ ● ●
- 10. Disclosure on payments to governments? ○ ● ●
- 11. Conflict-free sourcing policy? ○ ● ●
- 12. Covered tin/tantalum materials? ○ ● ●
- 13. Covered the DRC and adjoining countries? ○ ● ●
- 14. Part of standard operating procedures and training? ○ ● ●
- 15. Effective date? ○ ● ●
- 16. Shared with suppliers? ○ ● ●
- 17. Policy in English? ○ ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports? ○ ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**UMICORE (OLEN REFINERY)**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: BELGIUM [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? ○ ● ●
- 4. Described transparency and info collection?○ ● ● ●
- 5. Control systems over mineral supply chain?○ ● ● ●
- 6. Control system strengthened DD?○ ● ● ●
- 7. Record keeping system described?○ ● ● ●
- 8. Explained methods for identifying all suppliers?○ ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?○ ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?○ ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**VALE CANADA LTD. / VALE INCO LTD.**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: CANADA [SOR URL](#) Membership: LME

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? ○ ● ●
- 4. Described transparency and info collection? ○ ● ●
- 5. Control systems over mineral supply chain? ○ ● ●
- 6. Control system strengthened DD? ○ ● ●
- 7. Record keeping system described? ○ ● ●
- 8. Explained methods for identifying all suppliers? ○ ● ●
- 9. Explained methods for sharing information? ○ ● ●
- 10. Disclosure on payments to governments? ○ ● ●
- 11. Conflict-free sourcing policy? ○ ● ●
- 12. Covered tin/tantalum materials? ○ ● ●
- 13. Covered the DRC and adjoining countries? ○ ● ●
- 14. Part of standard operating procedures and training? ○ ● ●
- 15. Effective date? ○ ● ●
- 16. Shared with suppliers? ○ ● ●
- 17. Policy in English? ○ ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports? ○ ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**VOTORANTIM METAIS SA**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: BRAZIL [SOR URL](#) Membership: LME

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? ○ ● ●
- 4. Described transparency and info collection? ○ ● ●
- 5. Control systems over mineral supply chain? ○ ● ●
- 6. Control system strengthened DD? ○ ● ●
- 7. Record keeping system described? ○ ● ●
- 8. Explained methods for identifying all suppliers? ○ ● ●
- 9. Explained methods for sharing information? ○ ● ●
- 10. Disclosure on payments to governments? ○ ● ●
- 11. Conflict-free sourcing policy? ○ ● ●
- 12. Covered tin/tantalum materials? ○ ● ●
- 13. Covered the DRC and adjoining countries? ○ ● ●
- 14. Part of standard operating procedures and training? ○ ● ●
- 15. Effective date? ○ ● ●
- 16. Shared with suppliers? ○ ● ●
- 17. Policy in English? ○ ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports? ○ ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**YANTAI CASH INDUSTRIAL CO LTD**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: CHINA [SOR URL](#) Membership: LME, CCCMC, RCI

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? ○ ● ●
- 4. Described transparency and info collection? ○ ● ●
- 5. Control systems over mineral supply chain? ○ ● ●
- 6. Control system strengthened DD? ○ ● ●
- 7. Record keeping system described? ○ ● ●
- 8. Explained methods for identifying all suppliers? ○ ● ●
- 9. Explained methods for sharing information? ○ ● ●
- 10. Disclosure on payments to governments? ○ ● ●
- 11. Conflict-free sourcing policy? ○ ● ●
- 12. Covered tin/tantalum materials? ○ ● ●
- 13. Covered the DRC and adjoining countries? ○ ● ●
- 14. Part of standard operating procedures and training? ○ ● ●
- 15. Effective date? ○ ● ●
- 16. Shared with suppliers? ○ ● ●
- 17. Policy in English? ○ ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports? ○ ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ZHEJIANG HUAYOU COBALT COMPANY CO., LTD.**

Metal: Cobalt RMI SOR ID: none SOR Headquarter Country: CHINA [SOR URL](#) Membership: CCCMC, RCI

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection?<sup>o</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/17 (24%) M — RMAP: NA L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ABC REFINERY (AUSTRALIA) PTY LTD**

Metal: Gold RMI SOR ID: none SOR Headquarter Country: AUSTRALIA [SOR URL](#) Membership: LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 17/27 (63%) M — RMAP: 13/16 (81%) L — LBMA: 12/14 (86%) J — RJC CoC: 7/9 (78%) D — DMCC: 23/35 (66%) C — CCCMC: 8/15 (53%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ABINGTON RELDAN METALS, LLC**

Metal: Gold RMI SOR ID: CID002708 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/27 (7%) M — RMAP: 1/16 (6%) L — LBMA: 2/14 (14%) J — RJC CoC: 1/9 (11%) D — DMCC: 2/35 (6%) C — CCCMC: 2/15 (13%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ADVANCED CHEMICAL COMPANY**

Metal: Gold RMI SOR ID: CID000015 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/27 (4%) M — RMAP: 1/16 (6%) L — LBMA: 2/14 (14%) J — RJC CoC: 1/9 (11%) D — DMCC: 1/35 (3%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**AIDA CHEMICAL INDUSTRIES CO., LTD.**

Metal: Gold RMI SOR ID: CID000019 SOR Headquarter Country: JAPAN [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/27 (7%) M — RMAP: 2/16 (12%) L — LBMA: 1/14 (7%) J — RJC CoC: 2/9 (22%) D — DMCC: 2/35 (6%) C — CCCMC: 2/15 (13%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**AL ETIHAD GOLD LLC**

Metal: Gold RMI SOR ID: CID002560 SOR Headquarter Country: UNITED ARAB EMIRATES [SOR URL](#) Membership: RMAP Conformant, DMCC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 15/27 (56%) M — RMAP: 8/16 (50%) L — LBMA: 13/14 (93%) J — RJC CoC: 4/9 (44%) D — DMCC: 22/35 (63%) C — CCCMC: 7/15 (47%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ALLGEMEINE GOLD-UND SILBERSCHNEIDANSTALT A.G.**

Metal: Gold RMI SOR ID: CID000035 SOR Headquarter Country: GERMANY [SOR URL](#) Membership: RMAP Conformant, LBMA, RJC CoC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/27 (15%) M — RMAP: 4/16 (25%) L — LBMA: 2/14 (14%) J — RJC CoC: 2/9 (22%) D — DMCC: 4/35 (11%) C — CCCMC: 2/15 (13%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ALMALKYK MINING AND METALLURGICAL COMPLEX (AMMC)**

Metal: Gold RMI SOR ID: CID000041 SOR Headquarter Country: UZBEKISTAN [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/27 (4%) M — RMAP: 1/16 (6%) L — LBMA: 2/14 (14%) J — RJC CoC: 2/9 (22%) D — DMCC: 1/35 (3%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ANGLOGOLD ASHANTI CORREGO DO SITIO MINERACAO**

Metal: Gold RMI SOR ID: CID000058 SOR Headquarter Country: BRAZIL [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** (73%) O — OECD: 18/27 (67%) M — RMAP: 14/16 (88%) L — LBMA: 8/14 (57%) J — RJC CoC: 9/9 (100%) D — DMCC: 25/35 (71%) C — CCCMC: 11/15

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ARGOR-HERAEUS S.A.**

Metal: Gold RMI SOR ID: CID000077 SOR Headquarter Country: SWITZERLAND [SOR URL](#) Membership: RMAP Conformant, LBMA, RJC CoC, DMCC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 8/27 (30%) M — RMAP: 5/16 (31%) L — LBMA: 13/14 (93%) J — RJC CoC: 4/9 (44%) D — DMCC: 15/35 (43%) C — CCCMC: 4/15 (27%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ASAHI PRETEC CORP.**

Metal: Gold RMI SOR ID: CID000082 SOR Headquarter Country: JAPAN [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

1. Due diligence (DD) policy?<sup>OMLJDC</sup>
2. Management structure described?<sup>OMD</sup>
3. Designated responsible manager? <sup>OMD</sup>
4. Described transparency and info collection?<sup>OD</sup>
5. Control systems over mineral supply chain?
6. Control system strengthened DD?<sup>OMD</sup>
7. Record keeping system described?<sup>OMD</sup>
8. Explained methods for identifying all suppliers?<sup>OMD</sup>
9. Explained methods for sharing information?<sup>OD</sup>
10. Disclosure on payments to governments?<sup>OMD</sup>
11. Conflict-free sourcing policy?
12. Covered tin/tantalum materials?
13. Covered the DRC and adjoining countries?
14. Part of standard operating procedures and training?
15. Effective date?
16. Shared with suppliers?
17. Policy in English?<sup>L</sup>

**Step 2: Risk assessment**

18. Published risk report?<sup>OMDC</sup>
19. Outlined methodology of risk assessment?<sup>OMDC</sup>
20. Explained methodology of risk assessment?
21. Collaboration with upstream companies?<sup>ODC</sup>
22. Company-specific circumstances considered in joint work?<sup>ODC</sup>
23. Disclosed the actual or potential risks identified?<sup>ODC</sup>
24. Explained how red flags were identified?<sup>ODC</sup>
25. Described the identified red flag suppliers?<sup>ODC</sup>
26. Steps to map red flag supplier operations?<sup>ODC</sup>

**Step 3: Risk management**

27. Described steps taken to manage risks?<sup>OMJDC</sup>
28. Included summary of risk mitigation?<sup>OMJDC</sup>
29. Described training?<sup>OMJDC</sup>
30. Involved affected stakeholders?<sup>OMJDC</sup>
31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup>
32. Number of supplier disengagement instances? <sup>OMJDC</sup>
33. Operational grievance mechanism?<sup>J</sup>
34. Grievance mechanism procedure?<sup>J</sup>

**Step 4: Audits**

35. Published audit reports?<sup>OMLD</sup>
36. Refiner details and audit date?<sup>OLD</sup>
37. Audit activities and methodology described?<sup>OLD</sup>
38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup>
39. Published LBMA Summary Report annually?<sup>LD</sup>
40. Published auditor Assurance Report? <sup>LD</sup>
41. Published Refiner compliance report?<sup>LD</sup>
42. Name of refinery in compliance report? <sup>LD</sup>
43. Compliance time period in compliance report?<sup>LD</sup>
44. Summary of compliance activities in compliance report? <sup>LD</sup>
45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup>
46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup>

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 9/27 (33%) M — RMAP: 6/16 (38%) L — LBMA: 7/14 (50%) J — RJC CoC: 2/9 (22%) D — DMCC: 10/35 (29%) C — CCCMC: 3/15 (20%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ASAHI REFINING CANADA LTD.**

Metal: Gold RMI SOR ID: CID000924 SOR Headquarter Country: CANADA [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/27 (4%) M — RMAP: 1/16 (6%) L — LBMA: 2/14 (14%) J — RJC CoC: 1/9 (11%) D — DMCC: 1/35 (3%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ASAHI REFINING USA INC.**

Metal: Gold RMI SOR ID: CID000920 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/27 (4%) M — RMAP: 1/16 (6%) L — LBMA: 2/14 (14%) J — RJC CoC: 1/9 (11%) D — DMCC: 1/35 (3%) C — CCCMC: 1/15 (7%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ASAKA RIKEN CO., LTD.**

Metal: Gold RMI SOR ID: CID000090 SOR Headquarter Country: JAPAN [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

1. Due diligence (DD) policy?<sup>OMLJDC</sup>
2. Management structure described?<sup>OMD</sup>
3. Designated responsible manager? <sup>OMD</sup>
4. Described transparency and info collection?<sup>OD</sup>
5. Control systems over mineral supply chain?
6. Control system strengthened DD?<sup>OMD</sup>
7. Record keeping system described?<sup>OMD</sup>
8. Explained methods for identifying all suppliers?<sup>OMD</sup>
9. Explained methods for sharing information?<sup>OD</sup>
10. Disclosure on payments to governments?<sup>OMD</sup>
11. Conflict-free sourcing policy?
12. Covered tin/tantalum materials?
13. Covered the DRC and adjoining countries?
14. Part of standard operating procedures and training?
15. Effective date?
16. Shared with suppliers?
17. Policy in English?<sup>L</sup>

**Step 2: Risk assessment**

18. Published risk report?<sup>OMDC</sup>
19. Outlined methodology of risk assessment?<sup>OMDC</sup>
20. Explained methodology of risk assessment?
21. Collaboration with upstream companies?<sup>ODC</sup>
22. Company-specific circumstances considered in joint work?<sup>ODC</sup>
23. Disclosed the actual or potential risks identified?<sup>ODC</sup>
24. Explained how red flags were identified?<sup>ODC</sup>
25. Described the identified red flag suppliers?<sup>ODC</sup>
26. Steps to map red flag supplier operations?<sup>ODC</sup>

**Step 3: Risk management**

27. Described steps taken to manage risks?<sup>OMJDC</sup>
28. Included summary of risk mitigation?<sup>OMJDC</sup>
29. Described training?<sup>OMJDC</sup>
30. Involved affected stakeholders?<sup>OMJDC</sup>
31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup>
32. Number of supplier disengagement instances? <sup>OMJDC</sup>
33. Operational grievance mechanism?<sup>J</sup>
34. Grievance mechanism procedure?<sup>J</sup>

**Step 4: Audits**

35. Published audit reports?<sup>OMLD</sup>
36. Refiner details and audit date?<sup>OLD</sup>
37. Audit activities and methodology described?<sup>OLD</sup>
38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup>
39. Published LBMA Summary Report annually?<sup>LD</sup>
40. Published auditor Assurance Report? <sup>LD</sup>
41. Published Refiner compliance report?<sup>LD</sup>
42. Name of refinery in compliance report? <sup>LD</sup>
43. Compliance time period in compliance report?<sup>LD</sup>
44. Summary of compliance activities in compliance report? <sup>LD</sup>
45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup>
46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup>

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 3/27 (11%) M — RMAP: 3/16 (19%) L — LBMA: 2/14 (14%) J — RJC CoC: 1/9 (11%) D — DMCC: 3/35 (9%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ATASAY KUYUMCULUK SANAYI VE TICARET A.S.**

Metal: Gold RMI SOR ID: CID000103 SOR Headquarter Country: TURKEY [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**AU TRADERS AND REFINERS**

Metal: Gold RMI SOR ID: CID002850 SOR Headquarter Country: SOUTH AFRICA [SOR URL](#) Membership: RMAP Conformant, RJC CoC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/27 (4%) M — RMAP: 1/16 (6%) L — LBMA: 2/14 (14%) J — RJC CoC: 1/9 (11%) D — DMCC: 1/35 (3%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**AURUBIS AG**

Metal: Gold RMI SOR ID: CID000113 SOR Headquarter Country: GERMANY [SOR URL](#) Membership: RMAP Conformant, LBMA, LME

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/27 (4%) M — RMAP: 1/16 (6%) L — LBMA: 2/14 (14%) J — RJC CoC: 1/9 (11%) D — DMCC: 1/35 (3%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**BANGALORE REFINERY**

Metal: Gold RMI SOR ID: CID002863 SOR Headquarter Country: INDIA [SOR URL](#) Membership: RMAP Active

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**BANGKO SENTRAL NG PILIPINAS (CENTRAL BANK OF THE PHILIPPINES)**

Metal: Gold RMI SOR ID: CID000128 SOR Headquarter Country: PHILIPPINES [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**BOLIDEN COMMERCIAL AB**

Metal: Gold RMI SOR ID: CID000157 SOR Headquarter Country: SWEDEN [SOR URL](#) Membership: RMAP Conformant, LBMA, LME

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 18/27 (67%) M — RMAP: 12/16 (75%) L — LBMA: 7/14 (50%) J — RJC CoC: 6/9 (67%) D — DMCC: 19/35 (54%) C — CCCMC: 8/15 (53%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**C. HAFNER GMBH + CO. KG**

Metal: Gold RMI SOR ID: CID000176 SOR Headquarter Country: GERMANY [SOR URL](#) Membership: RMAP Conformant, LBMA, RJC CoC

**Step 1: Company management systems**

1. Due diligence (DD) policy?<sup>OMLJDC</sup>
2. Management structure described?<sup>OMD</sup>
3. Designated responsible manager? <sup>OMD</sup>
4. Described transparency and info collection?<sup>OD</sup>
5. Control systems over mineral supply chain?
6. Control system strengthened DD?<sup>OMD</sup>
7. Record keeping system described?<sup>OMD</sup>
8. Explained methods for identifying all suppliers?<sup>OMD</sup>
9. Explained methods for sharing information?<sup>OD</sup>
10. Disclosure on payments to governments?<sup>OMD</sup>
11. Conflict-free sourcing policy?
12. Covered tin/tantalum materials?
13. Covered the DRC and adjoining countries?
14. Part of standard operating procedures and training?
15. Effective date?
16. Shared with suppliers?
17. Policy in English?<sup>L</sup>

**Step 2: Risk assessment**

18. Published risk report?<sup>OMDC</sup>
19. Outlined methodology of risk assessment?<sup>OMDC</sup>
20. Explained methodology of risk assessment?
21. Collaboration with upstream companies?<sup>ODC</sup>
22. Company-specific circumstances considered in joint work?<sup>ODC</sup>
23. Disclosed the actual or potential risks identified?<sup>ODC</sup>
24. Explained how red flags were identified?<sup>ODC</sup>
25. Described the identified red flag suppliers?<sup>ODC</sup>
26. Steps to map red flag supplier operations?<sup>ODC</sup>

**Step 3: Risk management**

27. Described steps taken to manage risks?<sup>OMJDC</sup>
28. Included summary of risk mitigation?<sup>OMJDC</sup>
29. Described training?<sup>OMJDC</sup>
30. Involved affected stakeholders?<sup>OMJDC</sup>
31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup>
32. Number of supplier disengagement instances? <sup>OMJDC</sup>
33. Operational grievance mechanism?<sup>J</sup>
34. Grievance mechanism procedure?<sup>J</sup>

**Step 4: Audits**

35. Published audit reports?<sup>OMLD</sup>
36. Refiner details and audit date?<sup>OLD</sup>
37. Audit activities and methodology described?<sup>OLD</sup>
38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup>
39. Published LBMA Summary Report annually?<sup>LD</sup>
40. Published auditor Assurance Report? <sup>LD</sup>
41. Published Refiner compliance report?<sup>LD</sup>
42. Name of refinery in compliance report? <sup>LD</sup>
43. Compliance time period in compliance report?<sup>LD</sup>
44. Summary of compliance activities in compliance report? <sup>LD</sup>
45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup>
46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup>

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/27 (7%) M — RMAP: 1/16 (6%) L — LBMA: 2/14 (14%) J — RJC CoC: 1/9 (11%) D — DMCC: 2/35 (6%) C — CCCMC: 1/15 (7%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**CARIDAD**

Metal: Gold RMI SOR ID: CID000180 SOR Headquarter Country: MEXICO [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**CCR REFINERY - GLENCORE CANADA CORPORATION**

Metal: Gold RMI SOR ID: CID000185 SOR Headquarter Country: CANADA [SOR URL](#) Membership: RMAP Conformant, LBMA, LME

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 12/27 (44%) M — RMAP: 8/16 (50%) L — LBMA: 9/14 (64%) J — RJC CoC: 5/9 (56%) D — DMCC: 19/35 (54%) C — CCCMC: 9/15 (60%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**CENDRES + METAUX S.A.**

Metal: Gold RMI SOR ID: CID000189 SOR Headquarter Country: SWITZERLAND [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**CHIMET S.P.A.**

Metal: Gold RMI SOR ID: CID000233 SOR Headquarter Country: ITALY [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/27 (4%) M — RMAP: 1/16 (6%) L — LBMA: 1/14 (7%) J — RJC CoC: 1/9 (11%) D — DMCC: 1/35 (3%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**CHUGAI MINING**

Metal: Gold RMI SOR ID: CID000264 SOR Headquarter Country: JAPAN [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**DAEJIN INDUS CO., LTD.**

Metal: Gold RMI SOR ID: CID000328 SOR Headquarter Country: KOREA, REPUBLIC OF [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

1. Due diligence (DD) policy?<sup>OMLJDC</sup>
2. Management structure described?<sup>OMD</sup>
3. Designated responsible manager? <sup>OMD</sup>
4. Described transparency and info collection?<sup>OD</sup>
5. Control systems over mineral supply chain?
6. Control system strengthened DD?<sup>OMD</sup>
7. Record keeping system described?<sup>OMD</sup>
8. Explained methods for identifying all suppliers?<sup>OMD</sup>
9. Explained methods for sharing information?<sup>OD</sup>
10. Disclosure on payments to governments?<sup>OMD</sup>
11. Conflict-free sourcing policy?
12. Covered tin/tantalum materials?
13. Covered the DRC and adjoining countries?
14. Part of standard operating procedures and training?
15. Effective date?
16. Shared with suppliers?
17. Policy in English?<sup>L</sup>

**Step 2: Risk assessment**

18. Published risk report?<sup>OMDC</sup>
19. Outlined methodology of risk assessment?<sup>OMDC</sup>
20. Explained methodology of risk assessment?
21. Collaboration with upstream companies?<sup>ODC</sup>
22. Company-specific circumstances considered in joint work?<sup>ODC</sup>
23. Disclosed the actual or potential risks identified?<sup>ODC</sup>
24. Explained how red flags were identified?<sup>ODC</sup>
25. Described the identified red flag suppliers?<sup>ODC</sup>
26. Steps to map red flag supplier operations?<sup>ODC</sup>

**Step 3: Risk management**

27. Described steps taken to manage risks?<sup>OMJDC</sup>
28. Included summary of risk mitigation?<sup>OMJDC</sup>
29. Described training?<sup>OMJDC</sup>
30. Involved affected stakeholders?<sup>OMJDC</sup>
31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup>
32. Number of supplier disengagement instances? <sup>OMJDC</sup>
33. Operational grievance mechanism?<sup>J</sup>
34. Grievance mechanism procedure?<sup>J</sup>

**Step 4: Audits**

35. Published audit reports?<sup>OMLD</sup>
36. Refiner details and audit date?<sup>OLD</sup>
37. Audit activities and methodology described?<sup>OLD</sup>
38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup>
39. Published LBMA Summary Report annually?<sup>LD</sup>
40. Published auditor Assurance Report? <sup>LD</sup>
41. Published Refiner compliance report?<sup>LD</sup>
42. Name of refinery in compliance report? <sup>LD</sup>
43. Compliance time period in compliance report?<sup>LD</sup>
44. Summary of compliance activities in compliance report? <sup>LD</sup>
45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup>
46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup>

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 3/27 (11%) M — RMAP: 3/16 (19%) L — LBMA: 2/14 (14%) J — RJC CoC: 3/9 (33%) D — DMCC: 3/35 (9%) C — CCCMC: 3/15 (20%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**DAYE NON-FERROUS METALS MINING LTD.**

Metal: Gold RMI SOR ID: CID000343 SOR Headquarter Country: CHINA [SOR URL](#) Membership: LBMA, LME, SGE, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ● ●
- 5. Control systems over mineral supply chain? ● ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ● ●
- 11. Conflict-free sourcing policy? ● ● ● ●
- 12. Covered tin/tantalum materials? ● ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ● ●
- 14. Part of standard operating procedures and training? ● ● ● ●
- 15. Effective date? ● ● ● ●
- 16. Shared with suppliers? ● ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ● ●
- 20. Explained methodology of risk assessment? ● ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ● ●

● ● ● ● YES  
 ● ● ● ● NA  
 ● ● ● ● NO  
 ● ● ● ● ungraded

**Scores** O — OECD: 16/27 (59%) M — RMAP: 11/16 (69%) L — LBMA: 7/14 (50%) J — RJC CoC: 5/9 (56%) D — DMCC: 23/35 (66%) C — CCCMC: 9/15 (60%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**DEGUSSA SONNE / MOND GOLDHANDEL GMBH**

Metal: Gold RMI SOR ID: CID002867 SOR Headquarter Country: GERMANY [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**DODUCO GMBH**

Metal: Gold RMI SOR ID: CID000362 SOR Headquarter Country: GERMANY [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/27 (4%) M — RMAP: 1/16 (6%) L — LBMA: 2/14 (14%) J — RJC CoC: 1/9 (11%) D — DMCC: 1/35 (3%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**DOWA**

Metal: Gold RMI SOR ID: CID000401 SOR Headquarter Country: JAPAN [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/27 (15%) M — RMAP: 3/16 (19%) L — LBMA: 2/14 (14%) J — RJC CoC: 2/9 (22%) D — DMCC: 4/35 (11%) C — CCCMC: 2/15 (13%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**DS PRETECH CO., LTD.**

Metal: Gold RMI SOR ID: CID003195 SOR Headquarter Country: KOREA, REPUBLIC OF [SOR URL](#) Membership: RMAP Active

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**DSC (DO SUNG CORPORATION)**

Metal: Gold RMI SOR ID: CID000359 SOR Headquarter Country: KOREA, REPUBLIC OF [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

1. Due diligence (DD) policy?<sup>OMLJDC</sup>
2. Management structure described?<sup>OMD</sup>
3. Designated responsible manager? <sup>OMD</sup>
4. Described transparency and info collection?<sup>OD</sup>
5. Control systems over mineral supply chain?
6. Control system strengthened DD?<sup>OMD</sup>
7. Record keeping system described?<sup>OMD</sup>
8. Explained methods for identifying all suppliers?<sup>OMD</sup>
9. Explained methods for sharing information?<sup>OD</sup>
10. Disclosure on payments to governments?<sup>OMD</sup>
11. Conflict-free sourcing policy?
12. Covered tin/tantalum materials?
13. Covered the DRC and adjoining countries?
14. Part of standard operating procedures and training?
15. Effective date?
16. Shared with suppliers?
17. Policy in English?<sup>L</sup>

**Step 2: Risk assessment**

18. Published risk report?<sup>OMDC</sup>
19. Outlined methodology of risk assessment?<sup>OMDC</sup>
20. Explained methodology of risk assessment?
21. Collaboration with upstream companies?<sup>ODC</sup>
22. Company-specific circumstances considered in joint work?<sup>ODC</sup>
23. Disclosed the actual or potential risks identified?<sup>ODC</sup>
24. Explained how red flags were identified?<sup>ODC</sup>
25. Described the identified red flag suppliers?<sup>ODC</sup>
26. Steps to map red flag supplier operations?<sup>ODC</sup>

**Step 3: Risk management**

27. Described steps taken to manage risks?<sup>OMJDC</sup>
28. Included summary of risk mitigation?<sup>OMJDC</sup>
29. Described training?<sup>OMJDC</sup>
30. Involved affected stakeholders?<sup>OMJDC</sup>
31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup>
32. Number of supplier disengagement instances? <sup>OMJDC</sup>
33. Operational grievance mechanism?<sup>J</sup>
34. Grievance mechanism procedure?<sup>J</sup>

**Step 4: Audits**

35. Published audit reports?<sup>OMLD</sup>
36. Refiner details and audit date?<sup>OLD</sup>
37. Audit activities and methodology described?<sup>OLD</sup>
38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup>
39. Published LBMA Summary Report annually?<sup>LD</sup>
40. Published auditor Assurance Report? <sup>LD</sup>
41. Published Refiner compliance report?<sup>LD</sup>
42. Name of refinery in compliance report? <sup>LD</sup>
43. Compliance time period in compliance report?<sup>LD</sup>
44. Summary of compliance activities in compliance report? <sup>LD</sup>
45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup>
46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup>

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/27 (4%) M — RMAP: 1/16 (6%) L — LBMA: 2/14 (14%) J — RJC CoC: 1/9 (11%) D — DMCC: 1/35 (3%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ECO-SYSTEM RECYCLING CO., LTD.**

Metal: Gold RMI SOR ID: CID000425 SOR Headquarter Country: JAPAN [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

1. Due diligence (DD) policy?<sup>OMLJDC</sup>
2. Management structure described?<sup>OMD</sup>
3. Designated responsible manager? <sup>OMD</sup>
4. Described transparency and info collection?<sup>OD</sup>
5. Control systems over mineral supply chain?
6. Control system strengthened DD?<sup>OMD</sup>
7. Record keeping system described?<sup>OMD</sup>
8. Explained methods for identifying all suppliers?<sup>OMD</sup>
9. Explained methods for sharing information?<sup>OD</sup>
10. Disclosure on payments to governments?<sup>OMD</sup>
11. Conflict-free sourcing policy?
12. Covered tin/tantalum materials?
13. Covered the DRC and adjoining countries?
14. Part of standard operating procedures and training?
15. Effective date?
16. Shared with suppliers?
17. Policy in English?<sup>L</sup>

**Step 2: Risk assessment**

18. Published risk report?<sup>OMDC</sup>
19. Outlined methodology of risk assessment?<sup>OMDC</sup>
20. Explained methodology of risk assessment?
21. Collaboration with upstream companies?<sup>ODC</sup>
22. Company-specific circumstances considered in joint work?<sup>ODC</sup>
23. Disclosed the actual or potential risks identified?<sup>ODC</sup>
24. Explained how red flags were identified?<sup>ODC</sup>
25. Described the identified red flag suppliers?<sup>ODC</sup>
26. Steps to map red flag supplier operations?<sup>ODC</sup>

**Step 3: Risk management**

27. Described steps taken to manage risks?<sup>OMJDC</sup>
28. Included summary of risk mitigation?<sup>OMJDC</sup>
29. Described training?<sup>OMJDC</sup>
30. Involved affected stakeholders?<sup>OMJDC</sup>
31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup>
32. Number of supplier disengagement instances? <sup>OMJDC</sup>
33. Operational grievance mechanism?<sup>J</sup>
34. Grievance mechanism procedure?<sup>J</sup>

**Step 4: Audits**

35. Published audit reports?<sup>OMLD</sup>
36. Refiner details and audit date?<sup>OLD</sup>
37. Audit activities and methodology described?<sup>OLD</sup>
38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup>
39. Published LBMA Summary Report annually?<sup>LD</sup>
40. Published auditor Assurance Report? <sup>LD</sup>
41. Published Refiner compliance report?<sup>LD</sup>
42. Name of refinery in compliance report? <sup>LD</sup>
43. Compliance time period in compliance report?<sup>LD</sup>
44. Summary of compliance activities in compliance report? <sup>LD</sup>
45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup>
46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup>

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/27 (15%) M — RMAP: 3/16 (19%) L — LBMA: 2/14 (14%) J — RJC CoC: 2/9 (22%) D — DMCC: 4/35 (11%) C — CCCMC: 2/15 (13%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ELEMETAL REFINING, LLC**

Metal: Gold RMI SOR ID: CID001322 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**EMIRATES GOLD DMCC**

Metal: Gold RMI SOR ID: CID002561 SOR Headquarter Country: UNITED ARAB EMIRATES [SOR URL](#) Membership: RMAP Conformant, DMCC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 19/27 (70%) M — RMAP: 13/16 (81%) L — LBMA: 9/14 (64%) J — RJC CoC: 7/9 (78%) D — DMCC: 27/35 (77%) C — CCCMC: 12/15 (80%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**FIDELITY PRINTERS AND REFINERS LTD.**

Metal: Gold RMI SOR ID: CID002515 SOR Headquarter Country: ZIMBABWE [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GANSU SEEMINE MATERIAL HI-TECH CO., LTD.**

Metal: Gold RMI SOR ID: CID000522 SOR Headquarter Country: CHINA [SOR URL](#) Membership: SGE, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GCC GUJRAT GOLD CENTRE PVT. LTD.**

Metal: Gold RMI SOR ID: CID002852 SOR Headquarter Country: INDIA [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GEIB REFINING CORPORATION**

Metal: Gold RMI SOR ID: CID002459 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/27 (4%) M — RMAP: 1/16 (6%) L — LBMA: 2/14 (14%) J — RJC CoC: 1/9 (11%) D — DMCC: 1/35 (3%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GREAT WALL PRECIOUS METALS CO., LTD. OF CBPM**

Metal: Gold RMI SOR ID: CID001909 SOR Headquarter Country: CHINA [SOR URL](#) Membership: LBMA, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 7/27 (26%) M — RMAP: 3/16 (19%) L — LBMA: 5/14 (36%) J — RJC CoC: 0/9 (0%) D — DMCC: 8/35 (23%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GUANGDONG JINDING GOLD LIMITED**

Metal: Gold RMI SOR ID: CID002312 SOR Headquarter Country: CHINA [SOR URL](#) Membership: CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GUODA SAFINA HIGH-TECH ENVIRONMENTAL REFINERY CO., LTD.**

Metal: Gold RMI SOR ID: CID000651 SOR Headquarter Country: CHINA [SOR URL](#) Membership: SGE, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**HANGZHOU FUCHUNJIANG SMELTING CO., LTD.**

Metal: Gold RMI SOR ID: CID000671 SOR Headquarter Country: CHINA [SOR URL](#) Membership: CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**HEESUNG METAL LTD.**

Metal: Gold RMI SOR ID: CID000689 SOR Headquarter Country: KOREA, REPUBLIC OF [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/27 (4%) M — RMAP: 1/16 (6%) L — LBMA: 2/14 (14%) J — RJC CoC: 3/9 (33%) D — DMCC: 1/35 (3%) C — CCCMC: 1/15 (7%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**HEIMERLE + MEULE GMBH**

Metal: Gold RMI SOR ID: CID000694 SOR Headquarter Country: GERMANY [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 16/27 (59%) M — RMAP: 11/16 (69%) L — LBMA: 7/14 (50%) J — RJC CoC: 4/9 (44%) D — DMCC: 17/35 (49%) C — CCCMC: 6/15 (40%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**HERAEUS METALS HONG KONG LTD.**

Metal: Gold RMI SOR ID: CID000707 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, LBMA, RJC CoC, DMCC, SGE, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 18/27 (67%) M — RMAP: 13/16 (81%) L — LBMA: 9/14 (64%) J — RJC CoC: 7/9 (78%) D — DMCC: 25/35 (71%) C — CCCMC: 12/15 (80%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**HERAEUS PRECIOUS METALS GMBH & CO. KG**

Metal: Gold RMI SOR ID: CID000711 SOR Headquarter Country: GERMANY [SOR URL](#) Membership: RMAP Conformant, LBMA, DMCC, SGE

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 18/27 (67%) M — RMAP: 13/16 (81%) L — LBMA: 9/14 (64%) J — RJC CoC: 7/9 (78%) D — DMCC: 25/35 (71%) C — CCCMC: 12/15 (80%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**HUNAN CHENZHOU MINING CO., LTD.**

Metal: Gold RMI SOR ID: CID000767 SOR Headquarter Country: CHINA [SOR URL](#) Membership: SGE, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**HWASEONG CJ CO., LTD.**

Metal: Gold RMI SOR ID: CID000778 SOR Headquarter Country: KOREA, REPUBLIC OF [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**INNER MONGOLIA QIANKUN GOLD AND SILVER REFINERY SHARE CO., LTD.**

Metal: Gold RMI SOR ID: CID000801 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, LBMA, SGE, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 10/27 (37%) M — RMAP: 6/16 (38%) L — LBMA: 5/14 (36%) J — RJC CoC: 1/9 (11%) D — DMCC: 11/35 (31%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ISHIFUKU METAL INDUSTRY CO., LTD.**

Metal: Gold RMI SOR ID: CID000807 SOR Headquarter Country: JAPAN [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 9/27 (33%) M — RMAP: 7/16 (44%) L — LBMA: 7/14 (50%) J — RJC CoC: 2/9 (22%) D — DMCC: 14/35 (40%) C — CCCMC: 3/15 (20%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ISTANBUL GOLD REFINERY**

Metal: Gold RMI SOR ID: CID000814 SOR Headquarter Country: TURKEY [SOR URL](#) Membership: RMAP Conformant, LBMA, DMCC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ● ●
- 5. Control systems over mineral supply chain? ● ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ● ●
- 11. Conflict-free sourcing policy? ● ● ● ●
- 12. Covered tin/tantalum materials? ● ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ● ●
- 14. Part of standard operating procedures and training? ● ● ● ●
- 15. Effective date? ● ● ● ●
- 16. Shared with suppliers? ● ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ● ●
- 20. Explained methodology of risk assessment? ● ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ● ●

● ● ● ● YES  
 ● ● ● ● NA  
 ● ● ● ● NO  
 ● ● ● ● ungraded

**Scores** O — OECD: 9/27 (33%) M — RMAP: 7/16 (44%) L — LBMA: 6/14 (43%) J — RJC CoC: 3/9 (33%) D — DMCC: 15/35 (43%) C — CCCMC: 3/15 (20%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ITALPREZIOSI S.P.A.**

Metal: Gold RMI SOR ID: CID002765 SOR Headquarter Country: ITALY [SOR URL](#) Membership: RMAP Conformant, RJC CoC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/27 (4%) M — RMAP: 1/16 (6%) L — LBMA: 2/14 (14%) J — RJC CoC: 1/9 (11%) D — DMCC: 1/35 (3%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**JAPAN MINT**

Metal: Gold RMI SOR ID: CID000823 SOR Headquarter Country: JAPAN [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 6/27 (22%) M — RMAP: 3/16 (19%) L — LBMA: 9/14 (64%) J — RJC CoC: 1/9 (11%) D — DMCC: 13/35 (37%) C — CCCMC: 2/15 (13%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**JIANGXI COPPER CO., LTD.**

Metal: Gold RMI SOR ID: CID000855 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, LBMA, LME, SGE, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** (93%) O — OECD: 21/27 (78%) M — RMAP: 14/16 (88%) L — LBMA: 9/14 (64%) J — RJC CoC: 9/9 (100%) D — DMCC: 28/35 (80%) C — CCCMC: 14/15

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**JSC EKATERINBURG NON-FERROUS METAL PROCESSING PLANT**

Metal: Gold RMI SOR ID: CID000927 SOR Headquarter Country: RUSSIAN FEDERATION [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/27 (15%) M — RMAP: 3/16 (19%) L — LBMA: 7/14 (50%) J — RJC CoC: 0/9 (0%) D — DMCC: 11/35 (31%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**JSC NOVOSIBIRSK REFINERY**

Metal: Gold RMI SOR ID: CID000493 SOR Headquarter Country: RUSSIAN FEDERATION [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 14/27 (52%) M — RMAP: 11/16 (69%) L — LBMA: 9/14 (64%) J — RJC CoC: 6/9 (67%) D — DMCC: 21/35 (60%) C — CCCMC: 8/15 (53%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**JSC URALELECTROMED**

Metal: Gold RMI SOR ID: CID000929 SOR Headquarter Country: RUSSIAN FEDERATION [SOR URL](#) Membership: RMAP Conformant, LBMA, LME

**Step 1: Company management systems**

1. Due diligence (DD) policy?<sup>OMLJDC</sup>
2. Management structure described?<sup>OMD</sup>
3. Designated responsible manager? <sup>OMD</sup>
4. Described transparency and info collection?<sup>OD</sup>
5. Control systems over mineral supply chain?
6. Control system strengthened DD?<sup>OMD</sup>
7. Record keeping system described?<sup>OMD</sup>
8. Explained methods for identifying all suppliers?<sup>OMD</sup>
9. Explained methods for sharing information?<sup>OD</sup>
10. Disclosure on payments to governments?<sup>OMD</sup>
11. Conflict-free sourcing policy?
12. Covered tin/tantalum materials?
13. Covered the DRC and adjoining countries?
14. Part of standard operating procedures and training?
15. Effective date?
16. Shared with suppliers?
17. Policy in English?<sup>L</sup>

**Step 2: Risk assessment**

18. Published risk report?<sup>OMDC</sup>
19. Outlined methodology of risk assessment?<sup>OMDC</sup>
20. Explained methodology of risk assessment?
21. Collaboration with upstream companies?<sup>ODC</sup>
22. Company-specific circumstances considered in joint work?<sup>ODC</sup>
23. Disclosed the actual or potential risks identified?<sup>ODC</sup>
24. Explained how red flags were identified?<sup>ODC</sup>
25. Described the identified red flag suppliers?<sup>ODC</sup>
26. Steps to map red flag supplier operations?<sup>ODC</sup>

**Step 3: Risk management**

27. Described steps taken to manage risks?<sup>OMJDC</sup>
28. Included summary of risk mitigation?<sup>OMJDC</sup>
29. Described training?<sup>OMJDC</sup>
30. Involved affected stakeholders?<sup>OMJDC</sup>
31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup>
32. Number of supplier disengagement instances? <sup>OMJDC</sup>
33. Operational grievance mechanism?<sup>J</sup>
34. Grievance mechanism procedure?<sup>J</sup>

**Step 4: Audits**

35. Published audit reports?<sup>OMLD</sup>
36. Refiner details and audit date?<sup>OLD</sup>
37. Audit activities and methodology described?<sup>OLD</sup>
38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup>
39. Published LBMA Summary Report annually?<sup>LD</sup>
40. Published auditor Assurance Report? <sup>LD</sup>
41. Published Refiner compliance report?<sup>LD</sup>
42. Name of refinery in compliance report? <sup>LD</sup>
43. Compliance time period in compliance report?<sup>LD</sup>
44. Summary of compliance activities in compliance report? <sup>LD</sup>
45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup>
46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup>

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 6/27 (22%) M — RMAP: 4/16 (25%) L — LBMA: 0/14 (0%) J — RJC CoC: 4/9 (44%) D — DMCC: 6/35 (17%) C — CCCMC: 5/15 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**JX NIPPON MINING & METALS CO., LTD.**

Metal: Gold RMI SOR ID: CID000937 SOR Headquarter Country: JAPAN [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 7/27 (26%) M — RMAP: 4/16 (25%) L — LBMA: 9/14 (64%) J — RJC CoC: 1/9 (11%) D — DMCC: 14/35 (40%) C — CCCMC: 4/15 (27%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**KALOTI PRECIOUS METALS**

Metal: Gold RMI SOR ID: CID002563 SOR Headquarter Country: UNITED ARAB EMIRATES [SOR URL](#) Membership: SGE

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**KAZAKHMYS SMELTING LLC**

Metal: Gold RMI SOR ID: CID000956 SOR Headquarter Country: KAZAKHSTAN [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**KAZZINC**

Metal: Gold RMI SOR ID: CID000957 SOR Headquarter Country: KAZAKHSTAN [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 8/27 (30%) M — RMAP: 4/16 (25%) L — LBMA: 7/14 (50%) J — RJC CoC: 0/9 (0%) D — DMCC: 15/35 (43%) C — CCCMC: 4/15 (27%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**KENNECOTT UTAH COPPER LLC**

Metal: Gold RMI SOR ID: CID000969 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership: RMAP Conformant, LBMA, LME

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 5/27 (19%) M — RMAP: 2/16 (12%) L — LBMA: 7/14 (50%) J — RJC CoC: 1/9 (11%) D — DMCC: 6/35 (17%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**KGHM POLSKA MIEDZ SPOLKA AKCYJNA**

Metal: Gold RMI SOR ID: CID002511 SOR Headquarter Country: POLAND [SOR URL](#) Membership: RMAP Active, LME

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**KOJIMA CHEMICALS CO., LTD.**

Metal: Gold RMI SOR ID: CID000981 SOR Headquarter Country: JAPAN [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

1. Due diligence (DD) policy?<sup>OMLJDC</sup>
2. Management structure described?<sup>OMD</sup>
3. Designated responsible manager? <sup>OMD</sup>
4. Described transparency and info collection?<sup>OD</sup>
5. Control systems over mineral supply chain?
6. Control system strengthened DD?<sup>OMD</sup>
7. Record keeping system described?<sup>OMD</sup>
8. Explained methods for identifying all suppliers?<sup>OMD</sup>
9. Explained methods for sharing information?<sup>OD</sup>
10. Disclosure on payments to governments?<sup>OMD</sup>
11. Conflict-free sourcing policy?
12. Covered tin/tantalum materials?
13. Covered the DRC and adjoining countries?
14. Part of standard operating procedures and training?
15. Effective date?
16. Shared with suppliers?
17. Policy in English?<sup>L</sup>

**Step 2: Risk assessment**

18. Published risk report?<sup>OMDC</sup>
19. Outlined methodology of risk assessment?<sup>OMDC</sup>
20. Explained methodology of risk assessment?
21. Collaboration with upstream companies?<sup>ODC</sup>
22. Company-specific circumstances considered in joint work?<sup>ODC</sup>
23. Disclosed the actual or potential risks identified?<sup>ODC</sup>
24. Explained how red flags were identified?<sup>ODC</sup>
25. Described the identified red flag suppliers?<sup>ODC</sup>
26. Steps to map red flag supplier operations?<sup>ODC</sup>

**Step 3: Risk management**

27. Described steps taken to manage risks?<sup>OMJDC</sup>
28. Included summary of risk mitigation?<sup>OMJDC</sup>
29. Described training?<sup>OMJDC</sup>
30. Involved affected stakeholders?<sup>OMJDC</sup>
31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup>
32. Number of supplier disengagement instances? <sup>OMJDC</sup>
33. Operational grievance mechanism?<sup>J</sup>
34. Grievance mechanism procedure?<sup>J</sup>

**Step 4: Audits**

35. Published audit reports?<sup>OMLD</sup>
36. Refiner details and audit date?<sup>OLD</sup>
37. Audit activities and methodology described?<sup>OLD</sup>
38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup>
39. Published LBMA Summary Report annually?<sup>LD</sup>
40. Published auditor Assurance Report? <sup>LD</sup>
41. Published Refiner compliance report?<sup>LD</sup>
42. Name of refinery in compliance report? <sup>LD</sup>
43. Compliance time period in compliance report?<sup>LD</sup>
44. Summary of compliance activities in compliance report? <sup>LD</sup>
45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup>
46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup>

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/27 (4%) M — RMAP: 1/16 (6%) L — LBMA: 1/14 (7%) J — RJC CoC: 1/9 (11%) D — DMCC: 1/35 (3%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**KOREA ZINC CO., LTD.**

Metal: Gold RMI SOR ID: CID002605 SOR Headquarter Country: KOREA, REPUBLIC OF [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/27 (4%) M — RMAP: 1/16 (6%) L — LBMA: 2/14 (14%) J — RJC CoC: 1/9 (11%) D — DMCC: 1/35 (3%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**KYRGYZALTYN JSC**

Metal: Gold RMI SOR ID: CID001029 SOR Headquarter Country: KYRGYZSTAN [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 8/27 (30%) M — RMAP: 5/16 (31%) L — LBMA: 6/14 (43%) J — RJC CoC: 4/9 (44%) D — DMCC: 9/35 (26%) C — CCCMC: 4/15 (27%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**KYSHTYM COPPER-ELECTROLYTIC PLANT ZAO**

Metal: Gold RMI SOR ID: CID002865 SOR Headquarter Country: RUSSIAN FEDERATION [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**L'AZURDE COMPANY FOR JEWELRY**

Metal: Gold RMI SOR ID: CID001032 SOR Headquarter Country: SAUDI ARABIA [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**L'ORFEBRE S.A.**

Metal: Gold RMI SOR ID: CID002762 SOR Headquarter Country: ANDORRA [SOR URL](#) Membership: RMAP Active

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**LINGBAO GOLD CO., LTD.**

Metal: Gold RMI SOR ID: CID001056 SOR Headquarter Country: CHINA [SOR URL](#) Membership: SGE, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**LINGBAO JINYUAN TONGHUI REFINERY CO., LTD.**

Metal: Gold RMI SOR ID: CID001058 SOR Headquarter Country: CHINA [SOR URL](#) Membership: CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**LS-NIKKO COPPER INC.**

Metal: Gold RMI SOR ID: CID001078 SOR Headquarter Country: KOREA, REPUBLIC OF [SOR URL](#) Membership: RMAP Conformant, LBMA, LME

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 7/27 (26%) M — RMAP: 6/16 (38%) L — LBMA: 9/14 (64%) J — RJC CoC: 2/9 (22%) D — DMCC: 14/35 (40%) C — CCCMC: 4/15 (27%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**LUOYANG ZIJIN YINHUI GOLD REFINERY CO., LTD.**

Metal: Gold RMI SOR ID: CID001093 SOR Headquarter Country: CHINA [SOR URL](#) Membership: SGE, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**MARSAM METALS**

Metal: Gold RMI SOR ID: CID002606 SOR Headquarter Country: BRAZIL [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/27 (15%) M — RMAP: 3/16 (19%) L — LBMA: 2/14 (14%) J — RJC CoC: 3/9 (33%) D — DMCC: 4/35 (11%) C — CCCMC: 4/15 (27%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**MATERION**

Metal: Gold RMI SOR ID: CID001113 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/27 (7%) M — RMAP: 2/16 (12%) L — LBMA: 2/14 (14%) J — RJC CoC: 1/9 (11%) D — DMCC: 2/35 (6%) C — CCCMC: 1/15 (7%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**MATSUDA SANGYO CO., LTD.**

Metal: Gold RMI SOR ID: CID001119 SOR Headquarter Country: JAPAN [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 13/27 (48%) M — RMAP: 8/16 (50%) L — LBMA: 7/14 (50%) J — RJC CoC: 2/9 (22%) D — DMCC: 14/35 (40%) C — CCCMC: 3/15 (20%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**METALOR TECHNOLOGIES (HONG KONG) LTD.**

Metal: Gold RMI SOR ID: CID001149 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, LBMA, RJC CoC, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/27 (7%) M — RMAP: 2/16 (12%) L — LBMA: 2/14 (14%) J — RJC CoC: 1/9 (11%) D — DMCC: 2/35 (6%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**METALOR TECHNOLOGIES (SINGAPORE) PTE., LTD.**

Metal: Gold RMI SOR ID: CID001152 SOR Headquarter Country: SINGAPORE [SOR URL](#) Membership: RMAP Conformant, LBMA, RJC CoC

**Step 1: Company management systems**

1. Due diligence (DD) policy?<sup>OMLJDC</sup>
2. Management structure described?<sup>OMD</sup>
3. Designated responsible manager? <sup>OMD</sup>
4. Described transparency and info collection?<sup>OD</sup>
5. Control systems over mineral supply chain?
6. Control system strengthened DD?<sup>OMD</sup>
7. Record keeping system described?<sup>OMD</sup>
8. Explained methods for identifying all suppliers?<sup>OMD</sup>
9. Explained methods for sharing information?<sup>OD</sup>
10. Disclosure on payments to governments?<sup>OMD</sup>
11. Conflict-free sourcing policy?
12. Covered tin/tantalum materials?
13. Covered the DRC and adjoining countries?
14. Part of standard operating procedures and training?
15. Effective date?
16. Shared with suppliers?
17. Policy in English?<sup>L</sup>

**Step 2: Risk assessment**

18. Published risk report?<sup>OMDC</sup>
19. Outlined methodology of risk assessment?<sup>OMDC</sup>
20. Explained methodology of risk assessment?
21. Collaboration with upstream companies?<sup>ODC</sup>
22. Company-specific circumstances considered in joint work?<sup>ODC</sup>
23. Disclosed the actual or potential risks identified?<sup>ODC</sup>
24. Explained how red flags were identified?<sup>ODC</sup>
25. Described the identified red flag suppliers?<sup>ODC</sup>
26. Steps to map red flag supplier operations?<sup>ODC</sup>

**Step 3: Risk management**

27. Described steps taken to manage risks?<sup>OMJDC</sup>
28. Included summary of risk mitigation?<sup>OMJDC</sup>
29. Described training?<sup>OMJDC</sup>
30. Involved affected stakeholders?<sup>OMJDC</sup>
31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup>
32. Number of supplier disengagement instances? <sup>OMJDC</sup>
33. Operational grievance mechanism?<sup>J</sup>
34. Grievance mechanism procedure?<sup>J</sup>

**Step 4: Audits**

35. Published audit reports?<sup>OMLD</sup>
36. Refiner details and audit date?<sup>OLD</sup>
37. Audit activities and methodology described?<sup>OLD</sup>
38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup>
39. Published LBMA Summary Report annually?<sup>LD</sup>
40. Published auditor Assurance Report? <sup>LD</sup>
41. Published Refiner compliance report?<sup>LD</sup>
42. Name of refinery in compliance report? <sup>LD</sup>
43. Compliance time period in compliance report?<sup>LD</sup>
44. Summary of compliance activities in compliance report? <sup>LD</sup>
45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup>
46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup>

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/27 (7%) M — RMAP: 2/16 (12%) L — LBMA: 2/14 (14%) J — RJC CoC: 1/9 (11%) D — DMCC: 2/35 (6%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**METALOR TECHNOLOGIES (SUZHOU) LTD.**

Metal: Gold RMI SOR ID: CID001147 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, RJC CoC, SGE, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/27 (7%) M — RMAP: 2/16 (12%) L — LBMA: 2/14 (14%) J — RJC CoC: 1/9 (11%) D — DMCC: 2/35 (6%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**METALOR TECHNOLOGIES S.A.**

Metal: Gold RMI SOR ID: CID001153 SOR Headquarter Country: SWITZERLAND [SOR URL](#) Membership: RMAP Conformant, LBMA, RJC CoC, SGE

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/27 (7%) M — RMAP: 2/16 (12%) L — LBMA: 2/14 (14%) J — RJC CoC: 1/9 (11%) D — DMCC: 2/35 (6%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**METALOR USA REFINING CORPORATION**

Metal: Gold RMI SOR ID: CID001157 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership: RMAP Conformant, LBMA, RJC CoC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/27 (7%) M — RMAP: 2/16 (12%) L — LBMA: 2/14 (14%) J — RJC CoC: 1/9 (11%) D — DMCC: 2/35 (6%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**METALURGICA MET-MEX PENOLES S.A. DE C.V.**

Metal: Gold RMI SOR ID: CID001161 SOR Headquarter Country: MEXICO [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 5/27 (19%) M — RMAP: 2/16 (12%) L — LBMA: 7/14 (50%) J — RJC CoC: 1/9 (11%) D — DMCC: 6/35 (17%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**MITSUBISHI MATERIALS CORPORATION**

Metal: Gold RMI SOR ID: CID001188 SOR Headquarter Country: JAPAN [SOR URL](#) Membership: RMAP Conformant, LBMA, LME, SGE

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 15/27 (56%) M — RMAP: 11/16 (69%) L — LBMA: 9/14 (64%) J — RJC CoC: 4/9 (44%) D — DMCC: 22/35 (63%) C — CCCMC: 8/15 (53%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**MITSUI MINING AND SMELTING CO., LTD.**

Metal: Gold RMI SOR ID: CID001193 SOR Headquarter Country: JAPAN [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 13/27 (48%) M — RMAP: 10/16 (62%) L — LBMA: 9/14 (64%) J — RJC CoC: 5/9 (56%) D — DMCC: 20/35 (57%) C — CCCMC: 7/15 (47%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**MMTC-PAMP INDIA PVT., LTD.**

Metal: Gold RMI SOR ID: CID002509 SOR Headquarter Country: INDIA [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/27 (4%) M — RMAP: 1/16 (6%) L — LBMA: 2/14 (14%) J — RJC CoC: 1/9 (11%) D — DMCC: 1/35 (3%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**MODELTECH SDN BHD**

Metal: Gold RMI SOR ID: CID002857 SOR Headquarter Country: MALAYSIA [SOR URL](#) Membership: RMAP Active

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**MORRIS AND WATSON**

Metal: Gold RMI SOR ID: CID002282 SOR Headquarter Country: NEW ZEALAND [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
 ● ● ● NA  
 ● ● ● NO  
 ● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**MORRIS AND WATSON GOLD COAST**

Metal: Gold RMI SOR ID: CID002866 SOR Headquarter Country: AUSTRALIA [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**MOSCOW SPECIAL ALLOYS PROCESSING PLANT**

Metal: Gold RMI SOR ID: CID001204 SOR Headquarter Country: RUSSIAN FEDERATION [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 8/27 (30%) M — RMAP: 7/16 (44%) L — LBMA: 7/14 (50%) J — RJC CoC: 4/9 (44%) D — DMCC: 15/35 (43%) C — CCCMC: 5/15 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**NADIR METAL RAFINERI SAN. VE TIC. A.S.**

Metal: Gold RMI SOR ID: CID001220 SOR Headquarter Country: TURKEY [SOR URL](#) Membership: RMAP Conformant, LBMA, DMCC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 16/27 (59%) M — RMAP: 11/16 (69%) L — LBMA: 9/14 (64%) J — RJC CoC: 6/9 (67%) D — DMCC: 23/35 (66%) C — CCCMC: 10/15 (67%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**NAVOI MINING AND METALLURGICAL COMBINAT**

Metal: Gold RMI SOR ID: CID001236 SOR Headquarter Country: UZBEKISTAN [SOR URL](#) Membership: LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**NH RECYTECH COMPANY**

Metal: Gold RMI SOR ID: CID003189 SOR Headquarter Country: KOREA, REPUBLIC OF [SOR URL](#) Membership: RMAP Active

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**NIHON MATERIAL CO., LTD.**

Metal: Gold RMI SOR ID: CID001259 SOR Headquarter Country: JAPAN [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 12/27 (44%) M — RMAP: 9/16 (56%) L — LBMA: 9/14 (64%) J — RJC CoC: 3/9 (33%) D — DMCC: 19/35 (54%) C — CCCMC: 6/15 (40%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**OGUSSA OSTERREICHISCHE GOLD- UND SILBER-SCHNEIDANSTALT GMBH**

Metal: Gold RMI SOR ID: CID002779 SOR Headquarter Country: AUSTRIA [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

1. Due diligence (DD) policy?<sup>OMLJDC</sup>
2. Management structure described?<sup>OMD</sup>
3. Designated responsible manager? <sup>OMD</sup>
4. Described transparency and info collection?<sup>OD</sup>
5. Control systems over mineral supply chain?
6. Control system strengthened DD?<sup>OMD</sup>
7. Record keeping system described?<sup>OMD</sup>
8. Explained methods for identifying all suppliers?<sup>OMD</sup>
9. Explained methods for sharing information?<sup>OD</sup>
10. Disclosure on payments to governments?<sup>OMD</sup>
11. Conflict-free sourcing policy?
12. Covered tin/tantalum materials?
13. Covered the DRC and adjoining countries?
14. Part of standard operating procedures and training?
15. Effective date?
16. Shared with suppliers?
17. Policy in English?<sup>L</sup>

**Step 2: Risk assessment**

18. Published risk report?<sup>OMDC</sup>
19. Outlined methodology of risk assessment?<sup>OMDC</sup>
20. Explained methodology of risk assessment?
21. Collaboration with upstream companies?<sup>ODC</sup>
22. Company-specific circumstances considered in joint work?<sup>ODC</sup>
23. Disclosed the actual or potential risks identified?<sup>ODC</sup>
24. Explained how red flags were identified?<sup>ODC</sup>
25. Described the identified red flag suppliers?<sup>ODC</sup>
26. Steps to map red flag supplier operations?<sup>ODC</sup>

**Step 3: Risk management**

27. Described steps taken to manage risks?<sup>OMJDC</sup>
28. Included summary of risk mitigation?<sup>OMJDC</sup>
29. Described training?<sup>OMJDC</sup>
30. Involved affected stakeholders?<sup>OMJDC</sup>
31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup>
32. Number of supplier disengagement instances? <sup>OMJDC</sup>
33. Operational grievance mechanism?<sup>J</sup>
34. Grievance mechanism procedure?<sup>J</sup>

**Step 4: Audits**

35. Published audit reports?<sup>OMLD</sup>
36. Refiner details and audit date?<sup>OLD</sup>
37. Audit activities and methodology described?<sup>OLD</sup>
38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup>
39. Published LBMA Summary Report annually?<sup>LD</sup>
40. Published auditor Assurance Report? <sup>LD</sup>
41. Published Refiner compliance report?<sup>LD</sup>
42. Name of refinery in compliance report? <sup>LD</sup>
43. Compliance time period in compliance report?<sup>LD</sup>
44. Summary of compliance activities in compliance report? <sup>LD</sup>
45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup>
46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup>

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/27 (7%) M — RMAP: 2/16 (12%) L — LBMA: 2/14 (14%) J — RJC CoC: 2/9 (22%) D — DMCC: 2/35 (6%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**OHURA PRECIOUS METAL INDUSTRY CO., LTD.**

Metal: Gold RMI SOR ID: CID001325 SOR Headquarter Country: JAPAN [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

1. Due diligence (DD) policy?<sup>OMLJDC</sup>
2. Management structure described?<sup>OMD</sup>
3. Designated responsible manager? <sup>OMD</sup>
4. Described transparency and info collection?<sup>OD</sup>
5. Control systems over mineral supply chain?
6. Control system strengthened DD?<sup>OMD</sup>
7. Record keeping system described?<sup>OMD</sup>
8. Explained methods for identifying all suppliers?<sup>OMD</sup>
9. Explained methods for sharing information?<sup>OD</sup>
10. Disclosure on payments to governments?<sup>OMD</sup>
11. Conflict-free sourcing policy?
12. Covered tin/tantalum materials?
13. Covered the DRC and adjoining countries?
14. Part of standard operating procedures and training?
15. Effective date?
16. Shared with suppliers?
17. Policy in English?<sup>L</sup>

**Step 2: Risk assessment**

18. Published risk report?<sup>OMDC</sup>
19. Outlined methodology of risk assessment?<sup>OMDC</sup>
20. Explained methodology of risk assessment?
21. Collaboration with upstream companies?<sup>ODC</sup>
22. Company-specific circumstances considered in joint work?<sup>ODC</sup>
23. Disclosed the actual or potential risks identified?<sup>ODC</sup>
24. Explained how red flags were identified?<sup>ODC</sup>
25. Described the identified red flag suppliers?<sup>ODC</sup>
26. Steps to map red flag supplier operations?<sup>ODC</sup>

**Step 3: Risk management**

27. Described steps taken to manage risks?<sup>OMJDC</sup>
28. Included summary of risk mitigation?<sup>OMJDC</sup>
29. Described training?<sup>OMJDC</sup>
30. Involved affected stakeholders?<sup>OMJDC</sup>
31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup>
32. Number of supplier disengagement instances? <sup>OMJDC</sup>
33. Operational grievance mechanism?<sup>J</sup>
34. Grievance mechanism procedure?<sup>J</sup>

**Step 4: Audits**

35. Published audit reports?<sup>OMLD</sup>
36. Refiner details and audit date?<sup>OLD</sup>
37. Audit activities and methodology described?<sup>OLD</sup>
38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup>
39. Published LBMA Summary Report annually?<sup>LD</sup>
40. Published auditor Assurance Report? <sup>LD</sup>
41. Published Refiner compliance report?<sup>LD</sup>
42. Name of refinery in compliance report? <sup>LD</sup>
43. Compliance time period in compliance report?<sup>LD</sup>
44. Summary of compliance activities in compliance report? <sup>LD</sup>
45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup>
46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup>

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/27 (4%) M — RMAP: 1/16 (6%) L — LBMA: 2/14 (14%) J — RJC CoC: 1/9 (11%) D — DMCC: 1/35 (3%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**OJSC "THE GULIDOV KRASNOYARSK NON-FERROUS METALS PLANT" (OJSC KRASTSVETMET)**

Metal: Gold RMI SOR ID: CID001326 SOR Headquarter Country: RUSSIAN FEDERATION [SOR URL](#) Membership: RMAP Conformant, LBMA, DMCC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ● ●
- 5. Control systems over mineral supply chain? ● ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ● ●
- 11. Conflict-free sourcing policy? ● ● ● ●
- 12. Covered tin/tantalum materials? ● ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ● ●
- 14. Part of standard operating procedures and training? ● ● ● ●
- 15. Effective date? ● ● ● ●
- 16. Shared with suppliers? ● ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ● ●
- 20. Explained methodology of risk assessment? ● ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ● ●

● ● ● ● YES  
● ● ● ● NA  
● ● ● ● NO  
● ● ● ● ungraded

**Scores** O — OECD: 9/27 (33%) M — RMAP: 7/16 (44%) L — LBMA: 7/14 (50%) J — RJC CoC: 2/9 (22%) D — DMCC: 16/35 (46%) C — CCCMC: 3/15 (20%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PAMP S.A.**

Metal: Gold RMI SOR ID: CID001352 SOR Headquarter Country: SWITZERLAND [SOR URL](#) Membership: RMAP Conformant, LBMA, RJC CoC, DMCC, SGE

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 12/27 (44%) M — RMAP: 8/16 (50%) L — LBMA: 9/14 (64%) J — RJC CoC: 2/9 (22%) D — DMCC: 19/35 (54%) C — CCCMC: 5/15 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PEASE & CURREN**

Metal: Gold RMI SOR ID: CID002872 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PENGLAI PENGANG GOLD INDUSTRY CO., LTD.**

Metal: Gold RMI SOR ID: CID001362 SOR Headquarter Country: CHINA [SOR URL](#) Membership: CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PLANTA RECUPERADORA DE METALES SPA**

Metal: Gold RMI SOR ID: CID002919 SOR Headquarter Country: CHILE [SOR URL](#) Membership: RMAP Conformant, RMAP Active

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/27 (4%) M — RMAP: 1/16 (6%) L — LBMA: 2/14 (14%) J — RJC CoC: 1/9 (11%) D — DMCC: 1/35 (3%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PRIOKSKY PLANT OF NON-FERROUS METALS**

Metal: Gold RMI SOR ID: CID001386 SOR Headquarter Country: RUSSIAN FEDERATION [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ● ●
- 5. Control systems over mineral supply chain? ● ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ● ●
- 11. Conflict-free sourcing policy? ● ● ● ●
- 12. Covered tin/tantalum materials? ● ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ● ●
- 14. Part of standard operating procedures and training? ● ● ● ●
- 15. Effective date? ● ● ● ●
- 16. Shared with suppliers? ● ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ● ●
- 20. Explained methodology of risk assessment? ● ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ● ●

● ● ● ● YES  
 ● ● ● ● NA  
 ● ● ● ● NO  
 ● ● ● ● ungraded

**Scores** O — OECD: 8/27 (30%) M — RMAP: 6/16 (38%) L — LBMA: 7/14 (50%) J — RJC CoC: 2/9 (22%) D — DMCC: 15/35 (43%) C — CCCMC: 3/15 (20%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT ANEKA TAMBANG (PERSERO) TBK**

Metal: Gold RMI SOR ID: CID001397 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 7/27 (26%) M — RMAP: 6/16 (38%) L — LBMA: 2/14 (14%) J — RJC CoC: 3/9 (33%) D — DMCC: 7/35 (20%) C — CCCMC: 3/15 (20%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PX PRECINOX S.A.**

Metal: Gold RMI SOR ID: CID001498 SOR Headquarter Country: SWITZERLAND [SOR URL](#) Membership: RMAP Conformant, LBMA, RJC CoC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 10/27 (37%) M — RMAP: 8/16 (50%) L — LBMA: 9/14 (64%) J — RJC CoC: 2/9 (22%) D — DMCC: 17/35 (49%) C — CCCMC: 5/15 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**RAND REFINERY (PTY) LTD.**

Metal: Gold RMI SOR ID: CID001512 SOR Headquarter Country: SOUTH AFRICA [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 13/27 (48%) M — RMAP: 10/16 (62%) L — LBMA: 9/14 (64%) J — RJC CoC: 6/9 (67%) D — DMCC: 20/35 (57%) C — CCCMC: 8/15 (53%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**REMONDIS ARGENTIA B.V.**

Metal: Gold RMI SOR ID: CID002582 SOR Headquarter Country: NETHERLANDS [SOR URL](#) Membership: RMAP Active

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**REPUBLIC METALS CORPORATION**

Metal: Gold RMI SOR ID: CID002510 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership: RMAP Conformant, LBMA, RJC CoC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 16/27 (59%) M — RMAP: 12/16 (75%) L — LBMA: 7/14 (50%) J — RJC CoC: 5/9 (56%) D — DMCC: 17/35 (49%) C — CCCMC: 6/15 (40%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ROYAL CANADIAN MINT**

Metal: Gold RMI SOR ID: CID001534 SOR Headquarter Country: CANADA [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 18/27 (67%) M — RMAP: 13/16 (81%) L — LBMA: 9/14 (64%) J — RJC CoC: 6/9 (67%) D — DMCC: 25/35 (71%) C — CCCMC: 11/15 (73%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

SAAMP

Metal: Gold RMI SOR ID: CID002761 SOR Headquarter Country: FRANCE [SOR URL](#) Membership: RMAP Conformant, RJC CoC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/27 (4%) M — RMAP: 1/16 (6%) L — LBMA: 2/14 (14%) J — RJC CoC: 1/9 (11%) D — DMCC: 1/35 (3%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SABIN METAL CORP.**

Metal: Gold RMI SOR ID: CID001546 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SAFIMET S.P.A**

Metal: Gold RMI SOR ID: CID002973 SOR Headquarter Country: ITALY [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SAFINA A.S.**

Metal: Gold RMI SOR ID: CID002290 SOR Headquarter Country: CZECH REPUBLIC [SOR URL](#) Membership: RMAP Active

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SAI REFINERY**

Metal: Gold RMI SOR ID: CID002853 SOR Headquarter Country: INDIA [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SAMDUCK PRECIOUS METALS**

Metal: Gold RMI SOR ID: CID001555 SOR Headquarter Country: KOREA, REPUBLIC OF [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 1/14 (7%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SAMWON METALS CORP.**

Metal: Gold RMI SOR ID: CID001562 SOR Headquarter Country: KOREA, REPUBLIC OF [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SAXONIA EDELMETALLE GMBH**

Metal: Gold RMI SOR ID: CID002777 SOR Headquarter Country: GERMANY [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/27 (4%) M — RMAP: 1/16 (6%) L — LBMA: 2/14 (14%) J — RJC CoC: 1/9 (11%) D — DMCC: 1/35 (3%) C — CCCMC: 1/15 (7%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SCHONE EDELMETAAL B.V.**

Metal: Gold RMI SOR ID: CID001573 SOR Headquarter Country: NETHERLANDS [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SEMPA JOYERIA PLATERIA S.A.**

Metal: Gold RMI SOR ID: CID001585 SOR Headquarter Country: SPAIN [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 10/27 (37%) M — RMAP: 7/16 (44%) L — LBMA: 9/14 (64%) J — RJC CoC: 4/9 (44%) D — DMCC: 17/35 (49%) C — CCCMC: 7/15 (47%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SHANDONG GOLD SMELTING CO., LTD.**

Metal: Gold RMI SOR ID: CID001916 SOR Headquarter Country: CHINA [SOR URL](#) Membership: LBMA, SGE, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 16/27 (59%) M — RMAP: 12/16 (75%) L — LBMA: 6/14 (43%) J — RJC CoC: 5/9 (56%) D — DMCC: 17/35 (49%) C — CCCMC: 6/15 (40%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SHANDONG TIANCHENG BIOLOGICAL GOLD INDUSTRIAL CO., LTD.**

Metal: Gold RMI SOR ID: CID001619 SOR Headquarter Country: CHINA [SOR URL](#) Membership: CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SHANDONG ZHAOJIN GOLD AND SILVER REFINERY CO. LTD**

Metal: Gold RMI SOR ID: CID001622 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, LBMA, SGE, CCCMC

**Step 1: Company management systems**

1. Due diligence (DD) policy?<sup>OMLJDC</sup>
2. Management structure described?<sup>OMD</sup>
3. Designated responsible manager? <sup>OMD</sup>
4. Described transparency and info collection?<sup>OD</sup>
5. Control systems over mineral supply chain?
6. Control system strengthened DD?<sup>OMD</sup>
7. Record keeping system described?<sup>OMD</sup>
8. Explained methods for identifying all suppliers?<sup>OMD</sup>
9. Explained methods for sharing information?<sup>OD</sup>
10. Disclosure on payments to governments?<sup>OMD</sup>
11. Conflict-free sourcing policy?
12. Covered tin/tantalum materials?
13. Covered the DRC and adjoining countries?
14. Part of standard operating procedures and training?
15. Effective date?
16. Shared with suppliers?
17. Policy in English?<sup>L</sup>

**Step 2: Risk assessment**

18. Published risk report?<sup>OMDC</sup>
19. Outlined methodology of risk assessment?<sup>OMDC</sup>
20. Explained methodology of risk assessment?
21. Collaboration with upstream companies?<sup>ODC</sup>
22. Company-specific circumstances considered in joint work?<sup>ODC</sup>
23. Disclosed the actual or potential risks identified?<sup>ODC</sup>
24. Explained how red flags were identified?<sup>ODC</sup>
25. Described the identified red flag suppliers?<sup>ODC</sup>
26. Steps to map red flag supplier operations?<sup>ODC</sup>

**Step 3: Risk management**

27. Described steps taken to manage risks?<sup>OMJDC</sup>
28. Included summary of risk mitigation?<sup>OMJDC</sup>
29. Described training?<sup>OMJDC</sup>
30. Involved affected stakeholders?<sup>OMJDC</sup>
31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup>
32. Number of supplier disengagement instances? <sup>OMJDC</sup>
33. Operational grievance mechanism?<sup>J</sup>
34. Grievance mechanism procedure?<sup>J</sup>

**Step 4: Audits**

35. Published audit reports?<sup>OMLD</sup>
36. Refiner details and audit date?<sup>OLD</sup>
37. Audit activities and methodology described?<sup>OLD</sup>
38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup>
39. Published LBMA Summary Report annually?<sup>LD</sup>
40. Published auditor Assurance Report? <sup>LD</sup>
41. Published Refiner compliance report?<sup>LD</sup>
42. Name of refinery in compliance report? <sup>LD</sup>
43. Compliance time period in compliance report?<sup>LD</sup>
44. Summary of compliance activities in compliance report? <sup>LD</sup>
45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup>
46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup>

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 16/27 (59%) M — RMAP: 12/16 (75%) L — LBMA: 6/14 (43%) J — RJC CoC: 5/9 (56%) D — DMCC: 17/35 (49%) C — CCCMC: 6/15 (40%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SICHUAN TIANZE PRECIOUS METALS CO., LTD.**

Metal: Gold RMI SOR ID: CID001736 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, LBMA, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 18/27 (67%) M — RMAP: 13/16 (81%) L — LBMA: 6/14 (43%) J — RJC CoC: 6/9 (67%) D — DMCC: 19/35 (54%) C — CCCMC: 7/15 (47%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SINGWAY TECHNOLOGY CO., LTD.**

Metal: Gold RMI SOR ID: CID002516 SOR Headquarter Country: TAIWAN, PROVINCE OF CHINA [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/27 (4%) M — RMAP: 1/16 (6%) L — LBMA: 2/14 (14%) J — RJC CoC: 1/9 (11%) D — DMCC: 1/35 (3%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SO ACCURATE GROUP, INC.**

Metal: Gold RMI SOR ID: CID001754 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SOE SHYOLKOVSKY FACTORY OF SECONDARY PRECIOUS METALS**

Metal: Gold RMI SOR ID: CID001756 SOR Headquarter Country: RUSSIAN FEDERATION [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 17/27 (63%) M — RMAP: 11/16 (69%) L — LBMA: 7/14 (50%) J — RJC CoC: 6/9 (67%) D — DMCC: 18/35 (51%) C — CCCMC: 7/15 (47%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SOLAR APPLIED MATERIALS TECHNOLOGY CORP.**

Metal: Gold RMI SOR ID: CID001761 SOR Headquarter Country: TAIWAN, PROVINCE OF CHINA [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 17/27 (63%) M — RMAP: 11/16 (69%) L — LBMA: 7/14 (50%) J — RJC CoC: 6/9 (67%) D — DMCC: 18/35 (51%) C — CCCMC: 7/15 (47%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**STATE RESEARCH INSTITUTE CENTER FOR PHYSICAL SCIENCES AND TECHNOLOGY**

Metal: Gold RMI SOR ID: CID003153 SOR Headquarter Country: LITHUANIA [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SUDAN GOLD REFINERY**

Metal: Gold RMI SOR ID: CID002567 SOR Headquarter Country: SUDAN [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SUMITOMO METAL MINING CO., LTD.**

Metal: Gold RMI SOR ID: CID001798 SOR Headquarter Country: JAPAN [SOR URL](#) Membership: RMAP Conformant, LBMA, LME

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 13/27 (48%) M — RMAP: 10/16 (62%) L — LBMA: 9/14 (64%) J — RJC CoC: 4/9 (44%) D — DMCC: 20/35 (57%) C — CCCMC: 7/15 (47%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SUNGEEL HITECH**

Metal: Gold RMI SOR ID: CID002918 SOR Headquarter Country: KOREA, REPUBLIC OF [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/27 (4%) M — RMAP: 1/16 (6%) L — LBMA: 2/14 (14%) J — RJC CoC: 1/9 (11%) D — DMCC: 1/35 (3%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**T.C.A S.P.A**

Metal: Gold RMI SOR ID: CID002580 SOR Headquarter Country: ITALY [SOR URL](#) Membership: RMAP Conformant, LBMA, RJC CoC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/27 (15%) M — RMAP: 4/16 (25%) L — LBMA: 2/14 (14%) J — RJC CoC: 3/9 (33%) D — DMCC: 4/35 (11%) C — CCCMC: 3/15 (20%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**TANAKA KIKINZOKU KOGYO K.K.**

Metal: Gold RMI SOR ID: CID001875 SOR Headquarter Country: JAPAN [SOR URL](#) Membership: RMAP Conformant, LBMA, DMCC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 14/27 (52%) M — RMAP: 12/16 (75%) L — LBMA: 9/14 (64%) J — RJC CoC: 6/9 (67%) D — DMCC: 21/35 (60%) C — CCCMC: 9/15 (60%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**TOKURIKI HONTEN CO., LTD.**

Metal: Gold RMI SOR ID: CID001938 SOR Headquarter Country: JAPAN [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

1. Due diligence (DD) policy?<sup>OMLJDC</sup>
2. Management structure described?<sup>OMD</sup>
3. Designated responsible manager? <sup>OMD</sup>
4. Described transparency and info collection?<sup>OD</sup>
5. Control systems over mineral supply chain?
6. Control system strengthened DD?<sup>OMD</sup>
7. Record keeping system described?<sup>OMD</sup>
8. Explained methods for identifying all suppliers?<sup>OMD</sup>
9. Explained methods for sharing information?<sup>OD</sup>
10. Disclosure on payments to governments?<sup>OMD</sup>
11. Conflict-free sourcing policy?
12. Covered tin/tantalum materials?
13. Covered the DRC and adjoining countries?
14. Part of standard operating procedures and training?
15. Effective date?
16. Shared with suppliers?
17. Policy in English?<sup>L</sup>

**Step 2: Risk assessment**

18. Published risk report?<sup>OMDC</sup>
19. Outlined methodology of risk assessment?<sup>OMDC</sup>
20. Explained methodology of risk assessment?
21. Collaboration with upstream companies?<sup>ODC</sup>
22. Company-specific circumstances considered in joint work?<sup>ODC</sup>
23. Disclosed the actual or potential risks identified?<sup>ODC</sup>
24. Explained how red flags were identified?<sup>ODC</sup>
25. Described the identified red flag suppliers?<sup>ODC</sup>
26. Steps to map red flag supplier operations?<sup>ODC</sup>

**Step 3: Risk management**

27. Described steps taken to manage risks?<sup>OMJDC</sup>
28. Included summary of risk mitigation?<sup>OMJDC</sup>
29. Described training?<sup>OMJDC</sup>
30. Involved affected stakeholders?<sup>OMJDC</sup>
31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup>
32. Number of supplier disengagement instances? <sup>OMJDC</sup>
33. Operational grievance mechanism?<sup>J</sup>
34. Grievance mechanism procedure?<sup>J</sup>

**Step 4: Audits**

35. Published audit reports?<sup>OMLD</sup>
36. Refiner details and audit date?<sup>OLD</sup>
37. Audit activities and methodology described?<sup>OLD</sup>
38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup>
39. Published LBMA Summary Report annually?<sup>LD</sup>
40. Published auditor Assurance Report? <sup>LD</sup>
41. Published Refiner compliance report?<sup>LD</sup>
42. Name of refinery in compliance report? <sup>LD</sup>
43. Compliance time period in compliance report?<sup>LD</sup>
44. Summary of compliance activities in compliance report? <sup>LD</sup>
45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup>
46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup>

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 9/27 (33%) M — RMAP: 7/16 (44%) L — LBMA: 9/14 (64%) J — RJC CoC: 4/9 (44%) D — DMCC: 16/35 (46%) C — CCCMC: 6/15 (40%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**TONGLING NONFERROUS METALS GROUP CO., LTD.**

Metal: Gold RMI SOR ID: CID001947 SOR Headquarter Country: CHINA [SOR URL](#) Membership: LME, SGE, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**TONY GOETZ NV**

Metal: Gold RMI SOR ID: CID002587 SOR Headquarter Country: BELGIUM [SOR URL](#) Membership: RMAP Active, DMCC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**TOO TAU-KEN-ALTYN**

Metal: Gold RMI SOR ID: CID002615 SOR Headquarter Country: KAZAKHSTAN [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**TORECOM**

Metal: Gold RMI SOR ID: CID001955 SOR Headquarter Country: KOREA, REPUBLIC OF [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/27 (7%) M — RMAP: 2/16 (12%) L — LBMA: 2/14 (14%) J — RJC CoC: 1/9 (11%) D — DMCC: 2/35 (6%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**UMICORE BRASIL LTDA.**

Metal: Gold RMI SOR ID: CID001977 SOR Headquarter Country: BRAZIL [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 11/27 (41%) M — RMAP: 8/16 (50%) L — LBMA: 9/14 (64%) J — RJC CoC: 4/9 (44%) D — DMCC: 18/35 (51%) C — CCCMC: 7/15 (47%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**UMICORE PRECIOUS METALS THAILAND**

Metal: Gold RMI SOR ID: CID002314 SOR Headquarter Country: THAILAND [SOR URL](#) Membership: RMAP Conformant, RJC CoC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/27 (7%) M — RMAP: 2/16 (12%) L — LBMA: 2/14 (14%) J — RJC CoC: 2/9 (22%) D — DMCC: 2/35 (6%) C — CCCMC: 2/15 (13%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**UMICORE S.A. BUSINESS UNIT PRECIOUS METALS REFINING**

Metal: Gold RMI SOR ID: CID001980 SOR Headquarter Country: BELGIUM [SOR URL](#) Membership: RMAP Conformant, LBMA

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 11/27 (41%) M — RMAP: 8/16 (50%) L — LBMA: 9/14 (64%) J — RJC CoC: 4/9 (44%) D — DMCC: 18/35 (51%) C — CCCMC: 7/15 (47%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**UNITED PRECIOUS METAL REFINING, INC.**

Metal: Gold RMI SOR ID: CID001993 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/27 (7%) M — RMAP: 2/16 (12%) L — LBMA: 2/14 (14%) J — RJC CoC: 2/9 (22%) D — DMCC: 2/35 (6%) C — CCCMC: 2/15 (13%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**UNIVERSAL PRECIOUS METALS REFINING ZAMBIA**

Metal: Gold RMI SOR ID: CID002854 SOR Headquarter Country: ZAMBIA [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**VALCAMBI S.A.**

Metal: Gold RMI SOR ID: CID002003 SOR Headquarter Country: SWITZERLAND [SOR URL](#) Membership: RMAP Conformant, LBMA, RJC CoC, DMCC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 17/27 (63%) M — RMAP: 13/16 (81%) L — LBMA: 9/14 (64%) J — RJC CoC: 8/9 (89%) D — DMCC: 24/35 (69%) C — CCCMC: 10/15 (67%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**WESTERN AUSTRALIA MINT (T/A THE PERTH MINT)**

Metal: Gold RMI SOR ID: CID002030 SOR Headquarter Country: AUSTRALIA [SOR URL](#) Membership: RMAP Conformant, LBMA, DMCC, SGE

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 5/27 (19%) M — RMAP: 2/16 (12%) L — LBMA: 6/14 (43%) J — RJC CoC: 1/9 (11%) D — DMCC: 6/35 (17%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**WIELAND EDELMETALLE GMBH**

Metal: Gold RMI SOR ID: CID002778 SOR Headquarter Country: GERMANY [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/27 (4%) M — RMAP: 1/16 (6%) L — LBMA: 1/14 (7%) J — RJC CoC: 1/9 (11%) D — DMCC: 1/35 (3%) C — CCCMC: 1/15 (7%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**YAMAKIN CO., LTD.**

Metal: Gold RMI SOR ID: CID002100 SOR Headquarter Country: JAPAN [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

1. Due diligence (DD) policy?<sup>OMLJDC</sup>
2. Management structure described?<sup>OMD</sup>
3. Designated responsible manager? <sup>OMD</sup>
4. Described transparency and info collection?<sup>OD</sup>
5. Control systems over mineral supply chain?
6. Control system strengthened DD?<sup>OMD</sup>
7. Record keeping system described?<sup>OMD</sup>
8. Explained methods for identifying all suppliers?<sup>OMD</sup>
9. Explained methods for sharing information?<sup>OD</sup>
10. Disclosure on payments to governments?<sup>OMD</sup>
11. Conflict-free sourcing policy?
12. Covered tin/tantalum materials?
13. Covered the DRC and adjoining countries?
14. Part of standard operating procedures and training?
15. Effective date?
16. Shared with suppliers?
17. Policy in English?<sup>L</sup>

**Step 2: Risk assessment**

18. Published risk report?<sup>OMDC</sup>
19. Outlined methodology of risk assessment?<sup>OMDC</sup>
20. Explained methodology of risk assessment?
21. Collaboration with upstream companies?<sup>ODC</sup>
22. Company-specific circumstances considered in joint work?<sup>ODC</sup>
23. Disclosed the actual or potential risks identified?<sup>ODC</sup>
24. Explained how red flags were identified?<sup>ODC</sup>
25. Described the identified red flag suppliers?<sup>ODC</sup>
26. Steps to map red flag supplier operations?<sup>ODC</sup>

**Step 3: Risk management**

27. Described steps taken to manage risks?<sup>OMJDC</sup>
28. Included summary of risk mitigation?<sup>OMJDC</sup>
29. Described training?<sup>OMJDC</sup>
30. Involved affected stakeholders?<sup>OMJDC</sup>
31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup>
32. Number of supplier disengagement instances? <sup>OMJDC</sup>
33. Operational grievance mechanism?<sup>J</sup>
34. Grievance mechanism procedure?<sup>J</sup>

**Step 4: Audits**

35. Published audit reports?<sup>OMLD</sup>
36. Refiner details and audit date?<sup>OLD</sup>
37. Audit activities and methodology described?<sup>OLD</sup>
38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup>
39. Published LBMA Summary Report annually?<sup>LD</sup>
40. Published auditor Assurance Report? <sup>LD</sup>
41. Published Refiner compliance report?<sup>LD</sup>
42. Name of refinery in compliance report? <sup>LD</sup>
43. Compliance time period in compliance report?<sup>LD</sup>
44. Summary of compliance activities in compliance report? <sup>LD</sup>
45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup>
46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup>

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 3/27 (11%) M — RMAP: 3/16 (19%) L — LBMA: 2/14 (14%) J — RJC CoC: 2/9 (22%) D — DMCC: 3/35 (9%) C — CCCMC: 2/15 (13%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**YOKOHAMA METAL CO., LTD.**

Metal: Gold RMI SOR ID: CID002129 SOR Headquarter Country: JAPAN [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**YUNNAN COPPER INDUSTRY CO., LTD.**

Metal: Gold RMI SOR ID: CID000197 SOR Headquarter Country: CHINA [SOR URL](#) Membership: LME, SGE, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/27 (0%) M — RMAP: 0/16 (0%) L — LBMA: 0/14 (0%) J — RJC CoC: 0/9 (0%) D — DMCC: 0/35 (0%) C — CCCMC: 0/15 (0%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ZHONGYUAN GOLD SMELTER OF ZHONGJIN GOLD CORPORATION**

Metal: Gold RMI SOR ID: CID002224 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, LBMA, SGE, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 15/27 (56%) M — RMAP: 12/16 (75%) L — LBMA: 2/14 (14%) J — RJC CoC: 5/9 (56%) D — DMCC: 15/35 (43%) C — CCCMC: 8/15 (53%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ZIJIN MINING GROUP GOLD SMELTING CO., LTD.**

Metal: Gold RMI SOR ID: CID002243 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, LBMA, SGE, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMLJDC</sup> ● ● ●
- 2. Management structure described?<sup>OMD</sup> ● ● ●
- 3. Designated responsible manager? <sup>OMD</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OD</sup> ● ● ●
- 5. Control systems over mineral supply chain? ● ● ●
- 6. Control system strengthened DD?<sup>OMD</sup> ● ● ●
- 7. Record keeping system described?<sup>OMD</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OMD</sup> ● ● ●
- 9. Explained methods for sharing information?<sup>OD</sup> ● ● ●
- 10. Disclosure on payments to governments?<sup>OMD</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English?<sup>L</sup> ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMDC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMDC</sup> ● ● ●
- 20. Explained methodology of risk assessment? ● ● ●
- 21. Collaboration with upstream companies?<sup>ODC</sup> ● ● ●
- 22. Company-specific circumstances considered in joint work?<sup>ODC</sup> ● ● ●
- 23. Disclosed the actual or potential risks identified?<sup>ODC</sup> ● ● ●
- 24. Explained how red flags were identified?<sup>ODC</sup> ● ● ●
- 25. Described the identified red flag suppliers?<sup>ODC</sup> ● ● ●
- 26. Steps to map red flag supplier operations?<sup>ODC</sup> ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMJDC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMJDC</sup> ● ● ●
- 29. Described training?<sup>OMJDC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMJDC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMJDC</sup> ● ● ●
- 32. Number of supplier disengagement instances? <sup>OMJDC</sup> ● ● ●
- 33. Operational grievance mechanism?<sup>J</sup> ● ● ●
- 34. Grievance mechanism procedure?<sup>J</sup> ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OMLD</sup> ● ● ●
- 36. Refiner details and audit date?<sup>OLD</sup> ● ● ●
- 37. Audit activities and methodology described?<sup>OLD</sup> ● ● ●
- 38. Audit conclusions in line with 5 DD steps?<sup>OLD</sup> ● ● ●
- 39. Published LBMA Summary Report annually?<sup>LD</sup> ● ● ●
- 40. Published auditor Assurance Report? <sup>LD</sup> ● ● ●
- 41. Published Refiner compliance report?<sup>LD</sup> ● ● ●
- 42. Name of refinery in compliance report? <sup>LD</sup> ● ● ●
- 43. Compliance time period in compliance report?<sup>LD</sup> ● ● ●
- 44. Summary of compliance activities in compliance report? <sup>LD</sup> ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report?<sup>LD</sup> ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report?<sup>LD</sup> ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 13/27 (48%) M — RMAP: 9/16 (56%) L — LBMA: 6/14 (43%) J — RJC CoC: 3/9 (33%) D — DMCC: 14/35 (40%) C — CCCMC: 5/15 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ASAKA RIKEN CO., LTD.**

Metal: Tantalum RMI SOR ID: CID000092 SOR Headquarter Country: JAPAN [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 5/6 (83%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**CHANGSHA SOUTH TANTALUM NIOBIUM CO., LTD.**

Metal: Tantalum RMI SOR ID: CID000211 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 3/6 (50%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**CONGHUA TANTALUM AND NIOBIUM SMELTRY**

Metal: Tantalum RMI SOR ID: CID000291 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**D BLOCK METALS, LLC**

Metal: Tantalum RMI SOR ID: CID002504 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 3/6 (50%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**DUOLUOSHAN**

Metal: Tantalum RMI SOR ID: CID000410 SOR Headquarter Country: CHINA [SOR URL](#) Membership: CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**EXOTECH INC.**

Metal: Tantalum RMI SOR ID: CID000456 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**F&X ELECTRO-MATERIALS LTD.**

Metal: Tantalum RMI SOR ID: CID000460 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, iTSCi, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 11/17 (65%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 6/9 (67%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**FIR METALS & RESOURCE LTD.**

Metal: Tantalum RMI SOR ID: CID002505 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 3/17 (18%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GLOBAL ADVANCED METALS AIZU**

Metal: Tantalum RMI SOR ID: CID002558 SOR Headquarter Country: JAPAN [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 3/17 (18%) M — RMAP: 5/6 (83%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GLOBAL ADVANCED METALS BOYERTOWN**

Metal: Tantalum RMI SOR ID: CID002557 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 3/17 (18%) M — RMAP: 5/6 (83%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GUANGDONG RISING RARE METALS-EO MATERIALS LTD.**

Metal: Tantalum RMI SOR ID: CID000291 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 3/17 (18%) M — RMAP: 5/6 (83%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GUANGDONG ZHIYUAN NEW MATERIAL CO., LTD.**

Metal: Tantalum RMI SOR ID: CID000616 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, iTSCi, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/17 (24%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**H.C. STARCK CO., LTD.**

Metal: Tantalum RMI SOR ID: CID002544 SOR Headquarter Country: THAILAND [SOR URL](#) Membership: RMAP Conformant, iTSCi

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/17 (24%) M — RMAP: 3/6 (50%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**H.C. STARCK HERMSDORF GMBH**

Metal: Tantalum RMI SOR ID: CID002547 SOR Headquarter Country: GERMANY [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/17 (24%) M — RMAP: 3/6 (50%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**H.C. STARCK INC.**

Metal: Tantalum RMI SOR ID: CID002548 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/17 (24%) M — RMAP: 3/6 (50%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**H.C. STARCK LTD.**

Metal: Tantalum RMI SOR ID: CID002549 SOR Headquarter Country: JAPAN [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/17 (24%) M — RMAP: 3/6 (50%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**H.C. STARCK SMELTING GMBH & CO. KG**

Metal: Tantalum RMI SOR ID: CID002550 SOR Headquarter Country: GERMANY [SOR URL](#) Membership: RMAP Conformant, iTSCi

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/17 (24%) M — RMAP: 3/6 (50%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**H.C. STARCK TANTALUM AND NIOBIUM GMBH**

Metal: Tantalum RMI SOR ID: CID002545 SOR Headquarter Country: GERMANY [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/17 (24%) M — RMAP: 3/6 (50%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**HENGYANG KING XING LIFENG NEW MATERIALS CO., LTD.**

Metal: Tantalum RMI SOR ID: CID002492 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 3/6 (50%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**HI-TEMP SPECIALTY METALS, INC.**

Metal: Tantalum RMI SOR ID: CID000731 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**JIANGXI DINGHAI TANTALUM & NIOBIUM CO., LTD.**

Metal: Tantalum RMI SOR ID: CID002512 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**JIANGXI TUOHONG NEW RAW MATERIAL**

Metal: Tantalum RMI SOR ID: CID002842 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**JIUJIANG JANNY NEW MATERIAL CO., LTD.**

Metal: Tantalum RMI SOR ID: CID003191 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 3/17 (18%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**JIUJIANG JINXIN NONFERROUS METALS CO., LTD.**

Metal: Tantalum RMI SOR ID: CID000914 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, iTSCi, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 3/17 (18%) M — RMAP: 2/6 (33%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**JIUJIANG NONFERROUS METALS SMELTING COMPANY LIMITED**

Metal: Tantalum RMI SOR ID: CID000917 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 5/17 (29%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**JIUJIANG ZHONGAO TANTALUM & NIOBIUM CO., LTD.**

Metal: Tantalum RMI SOR ID: CID002506 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: 3/6 (50%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**KEMET BLUE METALS**

Metal: Tantalum RMI SOR ID: CID002539 SOR Headquarter Country: MEXICO [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 15/17 (88%) M — RMAP: 6/6 (100%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 8/9 (89%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**KEMET BLUE POWDER**

Metal: Tantalum RMI SOR ID: CID002568 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 15/17 (88%) M — RMAP: 6/6 (100%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 8/9 (89%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**KING-TAN TANTALUM INDUSTRY LTD.**

Metal: Tantalum RMI SOR ID: CID000973 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/17 (24%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**LSM BRASIL S.A.**

Metal: Tantalum RMI SOR ID: CID001076 SOR Headquarter Country: BRAZIL [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: 3/6 (50%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**METALLURGICAL PRODUCTS INDIA PVT., LTD.**

Metal: Tantalum RMI SOR ID: CID001163 SOR Headquarter Country: INDIA [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: 3/6 (50%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**MINERACAO TABOCA S.A.**

Metal: Tantalum RMI SOR ID: CID001175 SOR Headquarter Country: BRAZIL [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 5/17 (29%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**NINGXIA ORIENT TANTALUM INDUSTRY CO., LTD.**

Metal: Tantalum RMI SOR ID: CID001277 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 6/17 (35%) M — RMAP: 5/6 (83%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**NPM SILMET AS**

Metal: Tantalum RMI SOR ID: CID001200 SOR Headquarter Country: ESTONIA [SOR URL](#) Membership: RMAP Conformant, iTSCi

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**POWER RESOURCES LTD.**

Metal: Tantalum RMI SOR ID: CID002847 SOR Headquarter Country: MACEDONIA, THE FORMER YUGOSLAV REPUBLIC OF [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 5/17 (29%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**QUANTUMCLEAN**

Metal: Tantalum RMI SOR ID: CID001508 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**RESIND INDUSTRIA E COMERCIO LTDA.**

Metal: Tantalum RMI SOR ID: CID002707 SOR Headquarter Country: BRAZIL [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 5/17 (29%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**RFH TANTALUM SMELTRY CO., LTD.**

Metal: Tantalum RMI SOR ID: CID001522 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 5/17 (29%) M — RMAP: 5/6 (83%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SOLIKAMSK MAGNESIUM WORKS OAO**

Metal: Tantalum RMI SOR ID: CID001769 SOR Headquarter Country: RUSSIAN FEDERATION [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**TAKI CHEMICAL CO., LTD.**

Metal: Tantalum RMI SOR ID: CID001869 SOR Headquarter Country: JAPAN [SOR URL](#) Membership: RMAP Conformant, iTSCi

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**TELEX METALS**

Metal: Tantalum RMI SOR ID: CID001891 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership: RMAP Conformant, iTSCi

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 3/6 (50%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**TRANZACT, INC.**

Metal: Tantalum RMI SOR ID: CID002571 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ULBA METALLURGICAL PLANT JSC**

Metal: Tantalum RMI SOR ID: CID001969 SOR Headquarter Country: KAZAKHSTAN [SOR URL](#) Membership: RMAP Conformant, iTSCi

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/17 (24%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 4/9 (44%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**XINXING HAORONG ELECTRONIC MATERIAL CO., LTD.**

Metal: Tantalum RMI SOR ID: CID002508 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 3/6 (50%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**YICHUN JIN YANG RARE METAL CO., LTD.**

Metal: Tantalum RMI SOR ID: CID002307 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ZHUZHOU CEMENTED CARBIDE GROUP CO., LTD.**

Metal: Tantalum RMI SOR ID: CID002232 SOR Headquarter Country: CHINA [SOR URL](#) Membership: iTSCi, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ALPHA**

Metal: Tin RMI SOR ID: CID000292 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**AN THAI MINERALS CO., LTD.**

Metal: Tin RMI SOR ID: CID002825 SOR Headquarter Country: VIET NAM [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**AN VINH JOINT STOCK MINERAL PROCESSING COMPANY**

Metal: Tin RMI SOR ID: CID002703 SOR Headquarter Country: VIET NAM [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**CHENZHOU YUNXIANG MINING AND METALLURGY CO., LTD.**

Metal: Tin RMI SOR ID: CID000228 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 5/17 (29%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**CHIFENG DAJINGZI TIN INDUSTRY CO., LTD.**

Metal: Tin RMI SOR ID: CID003190 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Active, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**CHINA TIN GROUP CO., LTD.**

Metal: Tin RMI SOR ID: CID001070 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, LME, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: 5/6 (83%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**CNMC (GUANGXI) PGMA CO., LTD.**

Metal: Tin RMI SOR ID: CID000278 SOR Headquarter Country: CHINA [SOR URL](#) Membership: LME, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**COOPERATIVA METALURGICA DE RONDONIA LTDA.**

Metal: Tin RMI SOR ID: CID000295 SOR Headquarter Country: BRAZIL [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**CV AYI JAYA**

Metal: Tin RMI SOR ID: CID002570 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**CV DUA SEKAWAN**

Metal: Tin RMI SOR ID: CID002592 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**CV GITA PESONA**

Metal: Tin RMI SOR ID: CID000306 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 3/6 (50%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**CV SERUMPUN SEBALAI**

Metal: Tin RMI SOR ID: CID000313 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**CV TIGA SEKAWAN**

Metal: Tin RMI SOR ID: CID002593 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**CV UNITED SMELTING**

Metal: Tin RMI SOR ID: CID000315 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**CV VENUS INTI PERKASA**

Metal: Tin RMI SOR ID: CID002455 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**DA NANG PROCESSING IMPORT AND EXPORT JOINT STOCK**

Metal: Tin RMI SOR ID: CID003154 SOR Headquarter Country: VIET NAM [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**DOWA**

Metal: Tin RMI SOR ID: CID000402 SOR Headquarter Country: JAPAN [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 7/17 (41%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ELECTRO-MECHANICAL FACILITY OF THE CAO BANG MINERALS & METALLURGY JOINT STOCK COMPANY**

Metal: Tin RMI SOR ID: CID002572 SOR Headquarter Country: VIET NAM [SOR URL](#) Membership: RMAP Active

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ELMET S.L.U.**

Metal: Tin RMI SOR ID: CID002774 SOR Headquarter Country: SPAIN [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**EM VINTO**

Metal: Tin RMI SOR ID: CID000438 SOR Headquarter Country: BOLIVIA (PLURINATIONAL STATE OF) [SOR URL](#) Membership: RMAP Conformant, LME

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ESTANHO DE RONDONIA S.A.**

Metal: Tin RMI SOR ID: CID000448 SOR Headquarter Country: BRAZIL [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**FENIX METALS**

Metal: Tin RMI SOR ID: CID000468 SOR Headquarter Country: POLAND [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/17 (24%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GEJIU FENGMING METALLURGY CHEMICAL PLANT**

Metal: Tin RMI SOR ID: CID002848 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/17 (24%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 4/9 (44%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GEJIU JINYE MINERAL COMPANY**

Metal: Tin RMI SOR ID: CID002859 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, LME, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/17 (24%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 4/9 (44%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GEJIU KAI MENG INDUSTRY AND TRADE LLC**

Metal: Tin RMI SOR ID: CID000942 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GEJIU NON-FERROUS METAL PROCESSING CO., LTD.**

Metal: Tin RMI SOR ID: CID000538 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 3/17 (18%) M — RMAP: 3/6 (50%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GEJIU YUNXIN NONFERROUS ELECTROLYSIS CO., LTD.**

Metal: Tin RMI SOR ID: CID001908 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GEJIU ZILI MINING AND METALLURGY CO., LTD.**

Metal: Tin RMI SOR ID: CID000555 SOR Headquarter Country: CHINA [SOR URL](#) Membership: LME, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GUANGDONG HANHE NON-FERROUS METAL CO., LTD.**

Metal: Tin RMI SOR ID: CID003116 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GUANYANG GUIDA NONFERROUS METAL SMELTING PLANT**

Metal: Tin RMI SOR ID: CID002849 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**HUICHANG HILL TIN INDUSTRY CO., LTD.**

Metal: Tin RMI SOR ID: CID002844 SOR Headquarter Country: CHINA [SOR URL](#) Membership: CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**HUICHANG JINSHUNDA TIN CO., LTD.**

Metal: Tin RMI SOR ID: CID000760 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**JIANGXI KETAI ADVANCED MATERIAL CO., LTD.**

Metal: Tin RMI SOR ID: CID000244 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/17 (24%) M — RMAP: 6/6 (100%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 4/9 (44%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**MAGNU'S MINERAIS METAIS E LIGAS LTDA.**

Metal: Tin RMI SOR ID: CID002468 SOR Headquarter Country: BRAZIL [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**MALAYSIA SMELTING CORPORATION (MSC)**

Metal: Tin RMI SOR ID: CID001105 SOR Headquarter Country: MALAYSIA [SOR URL](#) Membership: RMAP Conformant, LME, iTSCi

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 3/17 (18%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**MELT METAIS E LIGAS S.A.**

Metal: Tin RMI SOR ID: CID002500 SOR Headquarter Country: BRAZIL [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/17 (24%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**METALLIC RESOURCES, INC.**

Metal: Tin RMI SOR ID: CID001142 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 3/17 (18%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**METALLO SPAIN S.L.U.**

Metal: Tin RMI SOR ID: CID002774 SOR Headquarter Country: SPAIN [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 3/17 (18%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**METALLO-CHIMIQUE N.V.**

Metal: Tin RMI SOR ID: CID002773 SOR Headquarter Country: BELGIUM [SOR URL](#) Membership: RMAP Conformant, LME

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 3/17 (18%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**MINERACAO TABOCA S.A.**

Metal: Tin RMI SOR ID: CID001173 SOR Headquarter Country: BRAZIL [SOR URL](#) Membership: RMAP Conformant, LME

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**MINSUR**

Metal: Tin RMI SOR ID: CID001182 SOR Headquarter Country: PERU [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**MITSUBISHI MATERIALS CORPORATION**

Metal: Tin RMI SOR ID: CID001191 SOR Headquarter Country: JAPAN [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 11/17 (65%) M — RMAP: 6/6 (100%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 5/9 (56%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**MODELTECH SDN BHD**

Metal: Tin RMI SOR ID: CID002858 SOR Headquarter Country: MALAYSIA [SOR URL](#) Membership: RMAP Active

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**NANKANG NANSHAN TIN MANUFACTORY CO., LTD.**

Metal: Tin RMI SOR ID: CID001231 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, RMAP Active, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**NGHE TINH NON-FERROUS METALS JOINT STOCK COMPANY**

Metal: Tin RMI SOR ID: CID002573 SOR Headquarter Country: VIET NAM [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**O.M. MANUFACTURING (THAILAND) CO., LTD.**

Metal: Tin RMI SOR ID: CID001314 SOR Headquarter Country: THAILAND [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**O.M. MANUFACTURING PHILIPPINES, INC.**

Metal: Tin RMI SOR ID: CID002517 SOR Headquarter Country: PHILIPPINES [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 5/6 (83%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**OPERACIONES METALURGICAL S.A.**

Metal: Tin RMI SOR ID: CID001337 SOR Headquarter Country: BOLIVIA (PLURINATIONAL STATE OF) [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 7/17 (41%) M — RMAP: 5/6 (83%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 4/9 (44%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT ARIES KENCANA SEJAHTERA**

Metal: Tin RMI SOR ID: CID000309 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT ARTHA CIPTA LANGGENG**

Metal: Tin RMI SOR ID: CID001399 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT ATD MAKMUR MANDIRI JAYA**

Metal: Tin RMI SOR ID: CID002503 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT BABEL INTI PERKASA**

Metal: Tin RMI SOR ID: CID001402 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, LME, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT BANGKA PRIMA TIN**

Metal: Tin RMI SOR ID: CID002776 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: 3/6 (50%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT BANGKA SERUMPUN**

Metal: Tin RMI SOR ID: CID003205 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, RMAP Active, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: 3/6 (50%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT BANGKA TIN INDUSTRY**

Metal: Tin RMI SOR ID: CID001419 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 3/17 (18%) M — RMAP: 5/6 (83%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT BELITUNG INDUSTRI SEJAHTERA**

Metal: Tin RMI SOR ID: CID001421 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT BUKIT TIMAH**

Metal: Tin RMI SOR ID: CID001428 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, LME, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT CIPTA PERSADA MULIA**

Metal: Tin RMI SOR ID: CID002696 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT DS JAYA ABADI**

Metal: Tin RMI SOR ID: CID001434 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 3/17 (18%) M — RMAP: 5/6 (83%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT EUNINDO USAHA MANDIRI**

Metal: Tin RMI SOR ID: CID001438 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT INTI STANIA PRIMA**

Metal: Tin RMI SOR ID: CID002530 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT JUSTINDO**

Metal: Tin RMI SOR ID: CID000307 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT KARIMUN MINING**

Metal: Tin RMI SOR ID: CID001448 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: 3/6 (50%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT KIJANG JAYA MANDIRI**

Metal: Tin RMI SOR ID: CID002829 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: 3/6 (50%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT LAUTAN HARMONIS SEJAHTERA**

Metal: Tin RMI SOR ID: CID002870 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT MENARA CIPTA MULIA**

Metal: Tin RMI SOR ID: CID002835 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT MITRA STANIA PRIMA**

Metal: Tin RMI SOR ID: CID001453 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, LME, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT O.M. INDONESIA**

Metal: Tin RMI SOR ID: CID002757 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT PANCA MEGA PERSADA**

Metal: Tin RMI SOR ID: CID001457 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT PRIMA TIMAH UTAMA**

Metal: Tin RMI SOR ID: CID001458 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, LME, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT REFINED BANGKA TIN**

Metal: Tin RMI SOR ID: CID001460 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, LME, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: 3/6 (50%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT SARIWIGUNA BINASENTOSA**

Metal: Tin RMI SOR ID: CID001463 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT STANINDO INTI PERKASA**

Metal: Tin RMI SOR ID: CID001468 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/17 (24%) M — RMAP: 5/6 (83%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT SUKSES INTI MAKMUR**

Metal: Tin RMI SOR ID: CID002816 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT SUMBER JAYA INDAH**

Metal: Tin RMI SOR ID: CID001471 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 3/6 (50%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT TIMAH (PERSERO) TBK KUNDUR**

Metal: Tin RMI SOR ID: CID001477 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, LME, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: 3/6 (50%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT TIMAH (PERSERO) TBK MENTOK**

Metal: Tin RMI SOR ID: CID001482 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, LME, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: 3/6 (50%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT TININDO INTER NUSA**

Metal: Tin RMI SOR ID: CID001490 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, LME, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PT TOMMY UTAMA**

Metal: Tin RMI SOR ID: CID001493 SOR Headquarter Country: INDONESIA [SOR URL](#) Membership: RMAP Conformant, ICDX

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/6 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**RESIND INDUSTRIA E COMERCIO LTDA.**

Metal: Tin RMI SOR ID: CID002706 SOR Headquarter Country: BRAZIL [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

RUI DA HUNG

Metal: Tin RMI SOR ID: CID001539 SOR Headquarter Country: TAIWAN, PROVINCE OF CHINA [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 3/17 (18%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SOFT METAIS LTDA.**

Metal: Tin RMI SOR ID: CID001758 SOR Headquarter Country: BRAZIL [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/17 (24%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SUPER LIGAS**

Metal: Tin RMI SOR ID: CID002756 SOR Headquarter Country: BRAZIL [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 2/6 (33%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**THAISARCO**

Metal: Tin RMI SOR ID: CID001898 SOR Headquarter Country: THAILAND [SOR URL](#) Membership: RMAP Conformant, LME

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 9/17 (53%) M — RMAP: 3/6 (50%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 5/9 (56%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**TUYEN QUANG NON-FERROUS METALS JOINT STOCK COMPANY**

Metal: Tin RMI SOR ID: CID002574 SOR Headquarter Country: VIET NAM [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 2/6 (33%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**VQB MINERAL AND TRADING GROUP JSC**

Metal: Tin RMI SOR ID: CID002015 SOR Headquarter Country: VIET NAM [SOR URL](#) Membership:

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 2/6 (33%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**WHITE SOLDER METALURGIA E MINERACAO LTDA.**

Metal: Tin RMI SOR ID: CID002036 SOR Headquarter Country: BRAZIL [SOR URL](#) Membership: RMAP Conformant, LME

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 3/17 (18%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**YUNNAN CHENGFENG NON-FERROUS METALS CO., LTD.**

Metal: Tin RMI SOR ID: CID002158 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, LME, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 3/17 (18%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**YUNNAN TIN COMPANY LIMITED**

Metal: Tin RMI SOR ID: CID002180 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, LME, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>oc</sup> ● ● ●
- 2. Management structure described?<sup>o</sup> ● ● ●
- 3. Designated responsible manager? <sup>o</sup> ● ● ●
- 4. Described transparency and info collection? ● ● ●
- 5. Control systems over mineral supply chain?<sup>o</sup> ● ● ●
- 6. Control system strengthened DD?<sup>o</sup> ● ● ●
- 7. Record keeping system described?<sup>o</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>o</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>o</sup> ● ● ●
- 11. Conflict-free sourcing policy? <sup>M</sup> ● ● ●
- 12. Covered tin/tantalum materials?<sup>M</sup> ● ● ●
- 13. Covered the DRC and adjoining countries?<sup>M</sup> ● ● ●
- 14. Part of standard operating procedures and training?<sup>M</sup> ● ● ●
- 15. Effective date?<sup>M</sup> ● ● ●
- 16. Shared with suppliers? <sup>M</sup> ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>oc</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>oc</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>oc</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>oc</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>oc</sup> ● ● ●
- 29. Described training?<sup>oc</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>oc</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>oc</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>o</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 5/17 (29%) M — RMAP: 4/6 (67%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**A.L.M.T. TUNGSTEN CORP.**

Metal: Tungsten RMI SOR ID: CID000004 SOR Headquarter Country: JAPAN [SOR URL](#) Membership: RMAP Conformant, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/17 (24%) M — RMAP: 4/17 (24%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ACL METAIS EIRELI**

Metal: Tungsten RMI SOR ID: CID002833 SOR Headquarter Country: BRAZIL [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/17 (24%) M — RMAP: 4/17 (24%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**ASIA TUNGSTEN PRODUCTS VIETNAM LTD.**

Metal: Tungsten RMI SOR ID: CID002502 SOR Headquarter Country: VIET NAM [SOR URL](#) Membership: RMAP Conformant, iTSCi

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 6/17 (35%) M — RMAP: 6/17 (35%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**CHENZHOU DIAMOND TUNGSTEN PRODUCTS CO., LTD.**

Metal: Tungsten RMI SOR ID: CID002513 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?[omc](#) ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? [om](#) ● ● ●
- 4. Described transparency and info collection?[om](#) ● ● ●
- 5. Control systems over mineral supply chain?[om](#) ● ● ●
- 6. Control system strengthened DD?[om](#) ● ● ●
- 7. Record keeping system described?[om](#) ● ● ●
- 8. Explained methods for identifying all suppliers?[om](#) ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?[om](#) ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?[omc](#) ● ● ●
- 19. Outlined methodology of risk assessment?[omc](#) ● ● ●
- 20. Explained methodology of risk assessment?[omc](#) ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?[omc](#) ● ● ●
- 28. Included summary of risk mitigation?[omc](#) ● ● ●
- 29. Described training?[omc](#) ● ● ●
- 30. Involved affected stakeholders?[omc](#) ● ● ●
- 31. Efforts to monitor risk mitigation performance?[omc](#) ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?[om](#) ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/17 (24%) M — RMAP: 4/17 (24%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**CHONGYI ZHANGYUAN TUNGSTEN CO., LTD.**

Metal: Tungsten RMI SOR ID: CID000258 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: 2/17 (12%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**DAYU WEILIANG TUNGSTEN CO., LTD.**

Metal: Tungsten RMI SOR ID: CID000345 SOR Headquarter Country: CHINA [SOR URL](#) Membership: CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/17 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**FUJIAN JINXIN TUNGSTEN CO., LTD.**

Metal: Tungsten RMI SOR ID: CID000499 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/17 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GANZHOU HAICHUANG TUNGSTEN INDUSTRY CO., LTD.**

Metal: Tungsten RMI SOR ID: CID002645 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Active, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/17 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GANZHOU HUAXING TUNGSTEN PRODUCTS CO., LTD.**

Metal: Tungsten RMI SOR ID: CID000875 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/17 (24%) M — RMAP: 4/17 (24%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GANZHOU JIANGWU FERROTUNGSTEN CO., LTD.**

Metal: Tungsten RMI SOR ID: CID002315 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?[omc](#) ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? [om](#) ● ● ●
- 4. Described transparency and info collection?[om](#) ● ● ●
- 5. Control systems over mineral supply chain?[om](#) ● ● ●
- 6. Control system strengthened DD?[om](#) ● ● ●
- 7. Record keeping system described?[om](#) ● ● ●
- 8. Explained methods for identifying all suppliers?[om](#) ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?[om](#) ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?[omc](#) ● ● ●
- 19. Outlined methodology of risk assessment?[omc](#) ● ● ●
- 20. Explained methodology of risk assessment?[omc](#) ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?[omc](#) ● ● ●
- 28. Included summary of risk mitigation?[omc](#) ● ● ●
- 29. Described training?[omc](#) ● ● ●
- 30. Involved affected stakeholders?[omc](#) ● ● ●
- 31. Efforts to monitor risk mitigation performance?[omc](#) ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?[om](#) ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
 ● ● ● NA  
 ● ● ● NO  
 ● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: 2/17 (12%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GANZHOU SEADRAGON W & MO CO., LTD.**

Metal: Tungsten RMI SOR ID: CID002494 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 1/17 (6%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GANZHOU YATAI TUNGSTEN CO., LTD.**

Metal: Tungsten RMI SOR ID: CID002536 SOR Headquarter Country: CHINA [SOR URL](#) Membership: CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/17 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GLOBAL TUNGSTEN & POWDERS CORP.**

Metal: Tungsten RMI SOR ID: CID000568 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership: RMAP Conformant, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: 2/17 (12%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**GUANGDONG XIANGLU TUNGSTEN CO., LTD.**

Metal: Tungsten RMI SOR ID: CID000218 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 1/17 (6%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**H.C. STARCK SMELTING GMBH & CO. KG**

Metal: Tungsten RMI SOR ID: CID002542 SOR Headquarter Country: GERMANY [SOR URL](#) Membership: RMAP Conformant, iTSCi, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/17 (24%) M — RMAP: 4/17 (24%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**H.C. STARCK TUNGSTEN GMBH**

Metal: Tungsten RMI SOR ID: CID002541 SOR Headquarter Country: GERMANY [SOR URL](#) Membership: RMAP Conformant, iTSCi, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/17 (24%) M — RMAP: 4/17 (24%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**HUNAN CHENZHOU MINING CO., LTD.**

Metal: Tungsten RMI SOR ID: CID000766 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/17 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**HUNAN CHUANGDA VANADIUM TUNGSTEN CO., LTD. WUJI**

Metal: Tungsten RMI SOR ID: CID002579 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/17 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**HUNAN CHUNCHANG NONFERROUS METALS CO., LTD.**

Metal: Tungsten RMI SOR ID: CID000769 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/17 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**HUNAN LITIAN TUNGSTEN INDUSTRY CO., LTD.**

Metal: Tungsten RMI SOR ID: CID003182 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Active, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/17 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**HYDROMETALLURG, JSC**

Metal: Tungsten RMI SOR ID: CID002649 SOR Headquarter Country: RUSSIAN FEDERATION [SOR URL](#) Membership: RMAP Conformant, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 1/17 (6%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**JAPAN NEW METALS CO., LTD.**

Metal: Tungsten RMI SOR ID: CID000825 SOR Headquarter Country: JAPAN [SOR URL](#) Membership: RMAP Conformant, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 1/17 (6%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**JIANGWU H.C. STARCK TUNGSTEN PRODUCTS CO., LTD.**

Metal: Tungsten RMI SOR ID: CID002551 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?[omc](#) ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? [om](#) ● ● ●
- 4. Described transparency and info collection?[om](#) ● ● ●
- 5. Control systems over mineral supply chain?[om](#) ● ● ●
- 6. Control system strengthened DD?[om](#) ● ● ●
- 7. Record keeping system described?[om](#) ● ● ●
- 8. Explained methods for identifying all suppliers?[om](#) ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?[om](#) ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?[omc](#) ● ● ●
- 19. Outlined methodology of risk assessment?[omc](#) ● ● ●
- 20. Explained methodology of risk assessment?[omc](#) ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?[omc](#) ● ● ●
- 28. Included summary of risk mitigation?[omc](#) ● ● ●
- 29. Described training?[omc](#) ● ● ●
- 30. Involved affected stakeholders?[omc](#) ● ● ●
- 31. Efforts to monitor risk mitigation performance?[omc](#) ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?[om](#) ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/17 (24%) M — RMAP: 4/17 (24%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**JIANGXI DAYU LONGXINTAI TUNGSTEN CO., LTD.**

Metal: Tungsten RMI SOR ID: CID002647 SOR Headquarter Country: CHINA [SOR URL](#) Membership: CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/17 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**JIANGXI GAN BEI TUNGSTEN CO., LTD.**

Metal: Tungsten RMI SOR ID: CID002321 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/17 (24%) M — RMAP: 4/17 (24%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**JIANGXI MINMETALS GAO'AN NON-FERROUS METALS CO., LTD.**

Metal: Tungsten RMI SOR ID: CID002313 SOR Headquarter Country: CHINA [SOR URL](#) Membership: CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 0/17 (0%) M — RMAP: 0/17 (0%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 0/9 (0%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**JIANGXI TONGGU NON-FERROUS METALLURGICAL & CHEMICAL CO., LTD.**

Metal: Tungsten RMI SOR ID: CID002318 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 5/17 (29%) M — RMAP: 5/17 (29%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**JIANGXI XINSHENG TUNGSTEN INDUSTRY CO., LTD.**

Metal: Tungsten RMI SOR ID: CID002317 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 5/17 (29%) M — RMAP: 5/17 (29%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**JIANGXI XIUSHUI XIANGGAN NONFERROUS METALS CO., LTD.**

Metal: Tungsten RMI SOR ID: CID002535 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 1/17 (6%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**JIANGXI YAOSHENG TUNGSTEN CO., LTD.**

Metal: Tungsten RMI SOR ID: CID002316 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?[omc](#) ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? [om](#) ● ● ●
- 4. Described transparency and info collection?[om](#) ● ● ●
- 5. Control systems over mineral supply chain?[om](#) ● ● ●
- 6. Control system strengthened DD?[om](#) ● ● ●
- 7. Record keeping system described?[om](#) ● ● ●
- 8. Explained methods for identifying all suppliers?[om](#) ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?[om](#) ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?[omc](#) ● ● ●
- 19. Outlined methodology of risk assessment?[omc](#) ● ● ●
- 20. Explained methodology of risk assessment?[omc](#) ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?[omc](#) ● ● ●
- 28. Included summary of risk mitigation?[omc](#) ● ● ●
- 29. Described training?[omc](#) ● ● ●
- 30. Involved affected stakeholders?[omc](#) ● ● ●
- 31. Efforts to monitor risk mitigation performance?[omc](#) ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?[om](#) ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 5/17 (29%) M — RMAP: 5/17 (29%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**KENNAMETAL FALLON**

Metal: Tungsten RMI SOR ID: CID000966 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership: RMAP Conformant, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 3/17 (18%) M — RMAP: 3/17 (18%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**KENNAMETAL HUNTSVILLE**

Metal: Tungsten RMI SOR ID: CID000105 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership: RMAP Conformant, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 3/17 (18%) M — RMAP: 3/17 (18%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**MALIPO HAIYU TUNGSTEN CO., LTD.**

Metal: Tungsten RMI SOR ID: CID002319 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 5/17 (29%) M — RMAP: 5/17 (29%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**MOLIREN LTD.**

Metal: Tungsten RMI SOR ID: CID002845 SOR Headquarter Country: RUSSIAN FEDERATION [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/17 (24%) M — RMAP: 4/17 (24%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**NIAGARA REFINING LLC**

Metal: Tungsten RMI SOR ID: CID002589 SOR Headquarter Country: UNITED STATES OF AMERICA [SOR URL](#) Membership: RMAP Conformant, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 3/17 (18%) M — RMAP: 3/17 (18%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**NUI PHAO H.C. STARCK TUNGSTEN CHEMICALS MANUFACTURING LLC**

Metal: Tungsten RMI SOR ID: CID002543 SOR Headquarter Country: VIET NAM [SOR URL](#) Membership: RMAP Conformant, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 4/17 (24%) M — RMAP: 4/17 (24%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**PHILIPPINE CHUANGXIN INDUSTRIAL CO., INC.**

Metal: Tungsten RMI SOR ID: CID002827 SOR Headquarter Country: PHILIPPINES [SOR URL](#) Membership: RMAP Conformant, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 3/17 (18%) M — RMAP: 3/17 (18%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**SOUTH-EAST NONFERROUS METAL COMPANY LIMITED OF HENGYANG CITY**

Metal: Tungsten RMI SOR ID: CID002815 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 3/17 (18%) M — RMAP: 3/17 (18%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**TEJING (VIETNAM) TUNGSTEN CO., LTD.**

Metal: Tungsten RMI SOR ID: CID001889 SOR Headquarter Country: VIET NAM [SOR URL](#) Membership: RMAP Conformant

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?[omc](#) ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? [om](#) ● ● ●
- 4. Described transparency and info collection?[om](#) ● ● ●
- 5. Control systems over mineral supply chain?[om](#) ● ● ●
- 6. Control system strengthened DD?[om](#) ● ● ●
- 7. Record keeping system described?[om](#) ● ● ●
- 8. Explained methods for identifying all suppliers?[om](#) ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?[om](#) ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?[omc](#) ● ● ●
- 19. Outlined methodology of risk assessment?[omc](#) ● ● ●
- 20. Explained methodology of risk assessment?[omc](#) ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?[omc](#) ● ● ●
- 28. Included summary of risk mitigation?[omc](#) ● ● ●
- 29. Described training?[omc](#) ● ● ●
- 30. Involved affected stakeholders?[omc](#) ● ● ●
- 31. Efforts to monitor risk mitigation performance?[omc](#) ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?[om](#) ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
 ● ● ● NA  
 ● ● ● NO  
 ● ● ● ungraded

**Scores** O — OECD: 2/17 (12%) M — RMAP: 2/17 (12%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)



3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**UNECHA REFRACTORY METALS PLANT**

Metal: Tungsten RMI SOR ID: CID002724 SOR Headquarter Country: RUSSIAN FEDERATION [SOR URL](#) Membership: RMAP Conformant, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 1/17 (6%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**VIETNAM YOUNGSUN TUNGSTEN INDUSTRY CO., LTD.**

Metal: Tungsten RMI SOR ID: CID002011 SOR Headquarter Country: VIET NAM [SOR URL](#) Membership: RMAP Conformant, iTSCi, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 3/17 (18%) M — RMAP: 3/17 (18%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**WOLFRAM BERGBAU UND HUTTEN AG**

Metal: Tungsten RMI SOR ID: CID002044 SOR Headquarter Country: AUSTRIA [SOR URL](#) Membership: RMAP Conformant, iTSCi, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 3/17 (18%) M — RMAP: 3/17 (18%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 2/9 (22%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**WOLTECH KOREA CO., LTD.**

Metal: Tungsten RMI SOR ID: CID002843 SOR Headquarter Country: KOREA, REPUBLIC OF [SOR URL](#) Membership: RMAP Conformant, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 5/17 (29%) M — RMAP: 5/17 (29%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**XIAMEN TUNGSTEN (H.C.) CO., LTD.**

Metal: Tungsten RMI SOR ID: CID002320 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 5/17 (29%) M — RMAP: 5/17 (29%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**XIAMEN TUNGSTEN CO., LTD.**

Metal: Tungsten RMI SOR ID: CID002082 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, iTSCi, CCCMC, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 5/17 (29%) M — RMAP: 5/17 (29%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 3/9 (33%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**XINFENG HUARUI TUNGSTEN & MOLYBDENUM NEW MATERIAL CO., LTD.**

Metal: Tungsten RMI SOR ID: CID002830 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 1/17 (6%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)

3TG+C Smelter and Refiner Disclosure Conformance with Leading Due Diligence and Assurance Standards

**XINHAI RENDAN SHAOGUAN TUNGSTEN CO., LTD.**

Metal: Tungsten RMI SOR ID: CID002095 SOR Headquarter Country: CHINA [SOR URL](#) Membership: RMAP Conformant, CCCMC, TI CMC

**Step 1: Company management systems**

- 1. Due diligence (DD) policy?<sup>OMC</sup> ● ● ●
- 2. Management structure described? ● ● ●
- 3. Designated responsible manager? <sup>OM</sup> ● ● ●
- 4. Described transparency and info collection?<sup>OM</sup> ● ● ●
- 5. Control systems over mineral supply chain?<sup>OM</sup> ● ● ●
- 6. Control system strengthened DD?<sup>OM</sup> ● ● ●
- 7. Record keeping system described?<sup>OM</sup> ● ● ●
- 8. Explained methods for identifying all suppliers?<sup>OM</sup> ● ● ●
- 9. Explained methods for sharing information? ● ● ●
- 10. Disclosure on payments to governments?<sup>OM</sup> ● ● ●
- 11. Conflict-free sourcing policy? ● ● ●
- 12. Covered tin/tantalum materials? ● ● ●
- 13. Covered the DRC and adjoining countries? ● ● ●
- 14. Part of standard operating procedures and training? ● ● ●
- 15. Effective date? ● ● ●
- 16. Shared with suppliers? ● ● ●
- 17. Policy in English? ● ● ●

**Step 2: Risk assessment**

- 18. Published risk report?<sup>OMC</sup> ● ● ●
- 19. Outlined methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 20. Explained methodology of risk assessment?<sup>OMC</sup> ● ● ●
- 21. Collaboration with upstream companies? ● ● ●
- 22. Company-specific circumstances considered in joint work? ● ● ●
- 23. Disclosed the actual or potential risks identified? ● ● ●
- 24. Explained how red flags were identified? ● ● ●
- 25. Described the identified red flag suppliers? ● ● ●
- 26. Steps to map red flag supplier operations? ● ● ●

**Step 3: Risk management**

- 27. Described steps taken to manage risks?<sup>OMC</sup> ● ● ●
- 28. Included summary of risk mitigation?<sup>OMC</sup> ● ● ●
- 29. Described training?<sup>OMC</sup> ● ● ●
- 30. Involved affected stakeholders?<sup>OMC</sup> ● ● ●
- 31. Efforts to monitor risk mitigation performance?<sup>OMC</sup> ● ● ●
- 32. Number of supplier disengagement instances? ● ● ●
- 33. Operational grievance mechanism? ● ● ●
- 34. Grievance mechanism procedure? ● ● ●

**Step 4: Audits**

- 35. Published audit reports?<sup>OM</sup> ● ● ●
- 36. Refiner details and audit date? ● ● ●
- 37. Audit activities and methodology described? ● ● ●
- 38. Audit conclusions in line with 5 DD steps? ● ● ●
- 39. Published LBMA Summary Report annually? ● ● ●
- 40. Published auditor Assurance Report? ● ● ●
- 41. Published Refiner compliance report? ● ● ●
- 42. Name of refinery in compliance report? ● ● ●
- 43. Compliance time period in compliance report? ● ● ●
- 44. Summary of compliance activities in compliance report? ● ● ●
- 45. Level of compliance with each step of LBMA RGG in compliance report? ● ● ●
- 46. Management conclusion on LBMA RGG compliance in compliance report? ● ● ●

● ● ● YES  
● ● ● NA  
● ● ● NO  
● ● ● ungraded

**Scores** O — OECD: 1/17 (6%) M — RMAP: 1/17 (6%) L — LBMA: NA J — RJC CoC: NA D — DMCC: NA C — CCCMC: 1/9 (11%)