

#### Mineral smelter/refiner

## **Mineral Supply Chain Due Diligence Assessment Tool**

Assessed party										
Assessing time										
Assessment type	□Main assessment	Main assessment Tracking assessment								
Assessment result	□Level AAA	🗆 Level AA	□ Level A □ Level B		🗆 Level C					
Assessing agency										
A	Name:	Tile:	Email:		Tel.:					
Assessor	Name:	Tile:	Email:		Tel.:					
Reviewed/approved	Name:	Tile:	Email:		Tel.:					
by										

The main entity applicable to this assessment checklist is the smelter/refiner in the mineral supply chain within the scope of the Chinese Due Diligence Guidelines for Responsible Mineral Supply Chain (Second Edition). During or after the assessment activity, it is filled out by the assessor, and the output is the assessment report. Signing the report by the assessed company means that the China Chamber of Commerce of Metals, Minerals & Chemical Importers & Exporters (CCCMC) has the right to use information on the assessment content and results, and the CCCMC will publish the assessment results or summary on its website.

The assessment report will be prepared in Chinese, and the summary report will be prepared in Chinese and English. The companies can translate it into other languages as needed, but the Chinese version shall prevail.

#### Instruction

#### **Objective:**

The exploitation and utilization of mineral resources should contribute to the realization of social development and economic prosperity. This assessment questionnaire is based on the due diligence recommendations provided by the Chinese Due Diligence Guidelines for Responsible Mineral Supply Chain (Second Edition), and aims to evaluate the performance of the company's due diligence management system and process, identify fields that need further improvements and formulate corresponding improvement measures.

#### Scope:

The Chinese Due Diligence Guidelines for Responsible Mineral Supply Chain (Second Edition) is applicable to all Chinese companies that mine, supply, purchase or process minerals in the mineral supply chain, including but not limited to tungsten, tin, tantalum, gold, cobalt, copper, aluminum, lead, zinc, nickel, molybdenum, rare earth, lithium, mica, barite, etc. These companies include upstream companies involved in the mineral supply chain (such as exploration, mining, smelting, processing, trading, and the stages between storage and transportation to processing), except for service providers (such as transportation, warehouses, packaging suppliers, etc.).

"Minerals" in the Chinese Due Diligence Guidelines for Responsible Mineral Supply Chain (Second Edition) refers to all applicable mineral resources and their products (such as ore, concentrate, metals, derivatives and by-products).

This assessment checklist is suitable for mineral smelters and refiners.

#### **Basis of the assessment:**

Chinese Due Diligence Guidelines for Responsible Mineral Supply Chain (Second Edition)

The Guidelines provide two situations. "Companies should" refers to specific recommendations on key points of due diligence, mainly from

the OECD Guidance (Third edition), and the specific details of its content; "Other suggestions" cover the requirements of industry initiatives, trading platforms, etc. for companies to carry out due diligence management as far as possible. The companies shall meet the content in "Companies should" parts. The conformity degree of the company with the content of "companies should" will affect the assessment results of the company. At the same time, it is suggested that the companies meet the "other suggestions" as far as possible.

In this assessment checklist, the content of "companies should" is indicated by gray shading, and the content of "other suggestions" is indicated by blue shading.

#### **Explanation of conformity degree:**

**Yes** (conformity): Indicates that the company's management system, policies, procedures or processes meet the requirements of corresponding provisions of the Guidelines.

**Need improvement**: Indicates that the company's management system, policies, procedures or processes partially meet the requirements of corresponding provisions of the Guidelines, but lack some necessary elements or content, or can not prove or lack evidence to prove that they are substantively functional, and further measures are needed to improve its performance.

**No (non-conformity)**: Indicates that the company's management system, policies, procedures, or processes cannot meet the requirements of corresponding provisions of the Guidelines, resulting in systematic and repetitive non-conformities.

Not applicable: Indicates that corresponding provisions of the Guidelines do not apply to the Company.

Zero tolerance: If any of the following situations occurs, it is a "zero tolerance" situation.

- 1. Misrepresentation, deliberately forging false evidence or vouchers;
- 2. Any form of support for illegal control, or illegal taxation and extortion by non-state armed groups;
- 3. Any form of torture, cruel, inhuman and degrading treatment;
- 4. Directly cause or contribute to forced or compulsory labor;
- 5. Cause or contribute to widespread sexual violence;

- 6. The worst forms of child labor;
- 7. War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide;
- 8. Other situations generally considered unacceptable.

#### **Explanation of assessment results:**

The overall assessment result is based on the percentages of "non-conformity" items and "need improvement" items. The China Chamber of Commerce of Metals, Minerals & Chemical Importers & Exporters (CCCMC) will provide the following suggestions on the assessment results:

Level AAA: There is no "non-conformity" items, indicating that the company has excellent supply chain due diligence management performance.

Level AA: the percentage of "Need improvement" does not exceed 15% of all applicable items, and the percentage of "non-conformity" items does not exceed 5% of all applicable items.

Level A: the percentage of "Need improvement" items does not exceed 25% of all applicable items, and the percentage of "non-conformity" items do not exceed 10% of all applicable items.

Level B: the percentage of "Need improvement" items does not exceed 35% of all applicable items, and the percentage of "non-conformity" items do not exceed 20% of all applicable items.

Level C: The above level cannot be reached or there is any "zero tolerance" situation.

CCCMC advocates continuous improvement, and companies need to formulate corrective action plan (CAP) with different time bound for "non- conformity", "need improvement" and "zero tolerance" items. Before the end of the improvement period, the assessment agency should be invited to conduct performance improvement tracking assessment.

The company needs to formulate a Corrective Action Plan (CAP) for the "need improvement" item, and significant progress shall be made during the improvement period (12 months);

The company needs to formulate a Corrective Action Plan (CAP) for "non-conformity" items, and significant progress shall be made during

the improvement period (6 months);

When "zero tolerance" situation is identified, the company should immediately improve, or temporarily suspend or terminate the cooperative relationship with relevant business partners, the assessment agency should be invited to carry out additional/tracking assessment before resuming the cooperative relationship to ensure that there should be significant improvements during the improvement period.

At the same time, this assessment result description is only suggestive. Business partners, investors, trading platforms, etc. can refer to the assessment results and make their own decisions based on their own standards.

#### **Description of assessment type:**

The assessment is divided into main assessment and tracking assessment. The main assessment needs to be carried out once a year; the tracking assessment is based on the type of non-conformity, and the performance tracking assessment is carried out every three months, six months or during the re-assessment (main assessment).

#### Grievance cope and channels

In the process of assessment, if the assessor acts in threats, soliciting bribes, fabricating information, etc., the assessed company can contact the CCCMC to submit a complaint.

Contact information: rbc@cccmc.org.cn

## 1. Assessed party

Company name			
Location	Province/	City	
	municipality		
Contact person		Tel.	
Profile number			

## 2. Assessment results

Туре	□Main assessment			□Tracking assessment				
Scope	Raw material:		Products:					
	Results:	□ Level AAA	□ Level AA	□ Level A		□ Level B	□ Level C	
Conclusion	□Need tracking assessment, tracking assessment time is no later than: Y M D							
	□Re-assessment	/ main assessmen	nt is time no later than:	Y M	D			

## 3. Assessment scope

Minerals	□Tungsten □ Tin □ Tantalum □ Gold □ Cobalt □ Copper □ Aluminum □ Lead □ Zinc □ Nickel □ Molybdenum □ Rare Earth □ Lithium □ Mica							
	□ Barite □Others, please specify:							
Mineral scope	□Mined material □Recycled material □Both							
Assessing period	□12 months □less than 12 months (Specify months)							
Origin of the	[Please specify Country-Region]							
material								
Transportation	$\$ Transportation routes and transportation methods from the place of origin to the factory $\$							

routes			
Applicable		uto 2 🗖	$\neg \mathbf{P}$ outo 2
routes <sup>1</sup>	$\Box$ Route 1 $\Box$ Rou		$\square$ Route 3

## 4. Summary of assessment results

Summary of assessment results		Breakdown					Breakdown				
	Conformity	Need improvement	Non-conformity	Zero tolerance	Not applicable		Conformity	Need improvement	Non-conformity	Zero tolerance	Not applicable
Establishing corporate due S1 diligence system	25	6	0	0	5	S1	20	10	1	0	5
Risk identification and S2 assessment	25	5	1	0	5	S2	20	10	1	0	5
Risk prevention S3 and mitigation	25	5	1	0	5	<b>S</b> 3	20	10	1	0	5
Internal and external S4 assessment	25	6	0	0	5	S4	20	10	1	0	5
Reporting and S5 communication	25	5	1	0	5	85	20	10	1	0	5
Provide for or S6 cooperate in	25	5	1	0	5	\$6	20	10	1	0	5

<sup>&</sup>lt;sup>1</sup> Applicable routes can refer to the Annex V of the Chinese Guidelines.

remediation										
	150	32	4	0	30	120	60	6	0	30
Sub-total	80.65%	17.20%	2.15%	0.00%	-	64.52%	32.26%	3.23%	0.00%	
Assessment results	lts A					-	-	В	-	

Note: The above data is only used for example, please fill in according to specific situations of the assessed company.

Step 1: Establishing a corporate due diligence system

[The assessor fills in the summary of the assessment results here, it should include the due diligence management measures that the company has implemented and areas need further improvement]

Step 2: Risk identification and assessment

Step 3: Risk prevention and mitigation

Step 4: Internal and external assessment

Step 5: Reporting and dissemination

Step 6: Provide for or cooperate in remediation when appropriate

## 5. Findings

# **Step 1:** Establishing a corporate due diligence system

Summary of the assessment results	Breakdown						
	Yes	Need improvement	No	Zero tolerance	Not applicable		
S1 Establishing a corporate due diligence system							

Note: The assessor can summarize the assessment results in this table after completing the assessment of "Step 1: Establishing a corporate due diligence system".

5.1.1 Develop and adopt due diligence policy								
Indicator	Yes	Need improve ment	No	N/A	Assessor's Summary Description of the Indicator			
5.1.1.1 Develop and adopt due diligence policy					The assessor's assessment conclusion on the performance of the enterprise in this indicator:			
Element	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation		
a. Develop a supply chain policy in written					• Written policy	Developed a supply chain due diligence policy, and provide the written version.		
b. The policy should include requirements for both the Company itself and its suppliers					<ul><li>Written policy</li><li>Terms review</li></ul>	The policy commitment contains requirements for the company itself and its suppliers.		
<ul> <li>c. Ensure that the content of the policy is consistent with the Model Supply Chain Policy</li> </ul>					<ul> <li>Written policy</li> <li>Terms review</li> </ul>	The policy is consistent with the Model Supply Chain Policy in Appendix I of the Chinese Guidelines and the Model Policy in Appendix II of the OECD Guidance, containing the description of various types of risk management.		
d. The response strategy in the policy should include a description of the					<ul><li>Written policy</li><li>Terms review</li></ul>	The policy is consistent with the Model Supply Chain Policy		

I	management process for identified				Template in Appendix I of the
r	risks				Chinese Guidelines and the Model
					Policy in Appendix II of the OECD
					Guidance; the policy includes
					description of risks management.
					The policy includes a commitment to
e. ]	The policy may include a commitment			• Written policy	implement the five-step due
t	to take stepwise actions to conduct due			<ul> <li>Written policy</li> <li>Terms review</li> </ul>	diligence management of the supply
C	diligence and an implementation plan			• Terms review	chain and a commitment to
					implement the policy.
f. 7	The company should formally approve			• Written policy	The policy peeds to be officially
t	the due diligence policy and make it			· ·	The policy needs to be officially
e	effective			• Signature/seal	signed to make it effective.

Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
5.1.1.2 In the process of policy formulation or revision, risk assessment results should be referenced, the most important risks should be given priority and measures should be formulated to prevent and mitigate these risks;					<ul><li>Written policy</li><li>Terms review</li></ul>	The policy is relevant, can respond to the identified supply chain risks and has a priority, and the policy can be adjusted according to the main risks to maintain its relevance.
5.1.1.3 The policy should be made publicly available in local languages;					<ul> <li>Written policy</li> <li>Public links, screenshots, etc.</li> </ul>	The policy should be made public, for example, on the corporate website; should be translated into local language so that the local can better read and understand it.
5.1.1.4 The Supplier Code of Conduct can be					• Supplier Code of Conduct	The supplier code of conduct can be

formulated in accordance with the				formulated according to the policy,
commitments and requirements of the due				and if it is formulated, it should be
diligence policy;				passed on to the supplier.
5.1.1.5 The due diligence policy should be				
regularly reviewed and updated as changes in			• Policy version	Regularly review and update the
business operations, supply chains, and other			• Provisions review	policy.
business relationships occur.				

## 5.1.1 Develop and adopt due diligence policy

 $\c The assessor fills in the assessment description for this requirement here \c I$ 

5.1.2 Structure appropriate internal management systems										
Indicator	Yes	Need improve ment	No	N/A	Assessor's summary description of the indicator					
5.1.2.1 Establish an internal management structure through which responsibilities should be assigned to senior manager and staff.					The assessor's assessment conclu enterprise in this indicator:	sion on the performance of the				
Element	Yes	Need	No	N/A	Description of supporting	Explanation				

The internal management structure should meet the following elements: a. Assign responsibility of due diligence to senior manager and staff;	improve ment		<ul> <li>document/evidence</li> <li>Letter of appointment and/or notice of the establishment of a working group</li> <li>Interdepartmental Committee/Working Group Management Measures</li> <li>Member list</li> </ul>	The company has appointed management staff to be responsible for supply chain due diligence management, and designated dedicated staff to be responsible for implementation.
<ul> <li>b. Assign authority to senior manager to oversee due diligence performance;</li> </ul>			<ul> <li>Letter of appointment</li> <li>Interdepartmental Committee/Working Group Management Measures</li> <li>Job description</li> <li>Meeting minutes</li> </ul>	The company designates senior management to be responsible for overseeing the implementation of due diligence management.
c. The authorized senior manager and responsible staff should have the ability to perform these tasks as well as corresponding authority and resources;			<ul> <li>Training record</li> <li>Notice</li> </ul>	Through training and learning, the management and employees are qualified, the company defines their power and provides resources, such as issuing notices to require relevant departments to cooperate.
<ul> <li>d. Conduct internal and external communication, to disseminate policies to relevant employees, such as during employee induction or training; and regular communication should be conducted as needed to let employees understand the policy;</li> </ul>			<ul> <li>Communication record</li> <li>Training record</li> </ul>	Make sure employees understand the policy through training, notification, and posting of promotional materials.
e. Implement an accountability system			• Performance appraisal record	Performance appraisal and job

for authorized and responsible	•	Job debriefing record	debriefing is required for the
management and employees.			appointed management and
			designated employees.

Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
5.1.2.2 Establish cross-functional committees or other measures to make due diligence related decisions;					<ul> <li>Cross-functional committee structure</li> <li>Management measures</li> </ul>	Established a management committee/working group involving multiple departments and formulated management measures
5.1.2.3 Provide internal training to help employees understand the requirements and responsibilities of due diligence;					<ul> <li>Training records (including sign-in list)</li> <li>Assessment record</li> </ul>	Training is carried out periodically to help employees understand the requirements of due diligence management.
5.1.2.4 Formulate performance goals and incentive measures for relevant departments to complete due diligence tasks;					<ul> <li>Performance requirements record</li> <li>Incentive measures record</li> </ul>	Formulate performance requirements and incentive measures related to due diligence management for relevant departments.
5.1.2.5 Develop or adjust existing information and record keeping systems to collect information on due diligence process, relevant decisions and response measures.					<ul> <li>Documentation procedure</li> <li>Documentation files</li> </ul>	Documented information management measures to keep tracking the work.

#### **5.1.2 Structure appropriate internal management systems**

 $\c The assessor fills in the assessment description for this requirement here \c I$ 

#### 5.1.3 Establish a system of controls and transparency over the supply chain

Indicator	Yes	Need improve ment	No	N/A	Assessor's summary description of the indicator	
5.1.3.1 Establish a supply chain control and transparency system.					The assessor's assessment conclusion on the performance of the enterprise in this indicator:	
Element	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
<b>a</b> . The sourcing country and region;					<ul><li>Certificate of Origin</li><li>Mining license</li></ul>	Prove the origin of the products the company sells to customers.
b. The names and addresses of the supplier;					<ul> <li>Business Registration License</li> <li>A copy of the signed contract</li> <li>(including liability clauses)</li> </ul>	The company needs to collect suppliers' due diligence information.
c. Transportation routes and					• List of transport routes or	Describe the transportation route

transportation approaches;			description	and method of raw materials.
d. Commercial name and type of mineral or metal.			• List of raw materials	Describe the commercial name and type of raw materials.
e. Collecting ownership (including beneficial ownership) information of all direct suppliers and other known upstream companies.			• Ownership information of upstream suppliers, including beneficial ownership, if involved	Collect ownership and beneficial ownership information of upstream suppliers to determine whether to trigger the red flags in their supply chains

Indicator	Yes	Need improve ment	No	N/A	Assessor's summary description of the indicator	
5.1.3.2 Companies should provide quality requirements for the declaration of origin and transportation routes					The assessor's assessment conclusion on the performance of the enterprise in this indicator:	
Element	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
a. The certificate of origin provided is true and supported with evidence;					• Certificate of origin	The certificate of origin of the raw materials is issued by the local authority or certified by the authority.
b. Provide training for responsible employees to ensure that employees understand the meaning and requirements of the certificate of					<ul> <li>Training record</li> <li>Communication record</li> </ul>	Relevant employees understand the meaning and management requirements of the certificate of origin.

	origin;				
с.	Provide replies and evidences to				If the customer has inquiries about
	customers and other related parties			• Response record	the certificate of origin, a reply can
	regarding origin inquiries ;				be provided.
d.	Provide channels for relevant parties to				Relevant parties can express their
	express doubts about the origin through			• Grievance terms	doubts about the origin information
	the grievance mechanism;				through the grievance mechanism.
e.	Collect information such as				The description of the transportation
	transportation trajectory and route map,			Transportation receipt	route is supplemented by documents
	carrier, shipping note, and receipt;				such as transportation receipt.
f.	Shipment, seal and code of ore or				
	processed products. During domestic				Apply seal management during
	and international transportation, the				transportation. Except for special
	seal must be kept intact, and the code			• Seal management	circumstances such as changing
	on the surface of the seal must be				containers, seals must be intact and
	consistent with the number on the				consistent.
	shipping document;				
g.	If there is any abnormal event during				Procedures for reporting and
	transportation, it should be reported			• Transportation accident	investigating abnormal events
	and investigated.			procedure	during transportation.

Indicator	Yes	Need improve ment	No	N/A	Assessor's summary description of the indicator
5.1.3.3 When warning signs are identified in the process of "warning signs screening" carried out in step 5.2.1, the supply chain control and transparency system should be improved to further supplement the chain of custody or					The assessor's assessment conclusion on the performance of the enterprise in this indicator:

mineral supply chain traceability information.						
Element	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
<ul> <li>On the basis of 5.1.3.1 (a-d), the information to be collected also includes (e-k):</li> <li>e. All taxes, fees or royalties paid to government for the purposes of extraction, trade, transport and export of minerals;</li> </ul>					<ul> <li>Tax payment certificate (mining tax, etc.)</li> <li>Tax Registration Number</li> <li>Royalties payment receipt</li> <li>Transportation fees, etc.</li> </ul>	Companies need to pay to the government in the areas of origin of minerals, including mining, trading, transportation, and exporting stage. The types of fees include taxes and royalties.
f. Any other payments made to governmental officials for the purpose of extraction, trade, transport and export of minerals;					<ul> <li>Payment description</li> <li>Invoice or receipt</li> </ul>	Customers need to pay to the government officials in the areas of origin of minerals, including mining, trading, transportation, and exporting stage. Note: If there is no media or NGO disclosure, generally it does not require supporting documents.
g. All taxes and any other payments made to public or private security forces or other armed groups at all points in the supply chain from extraction onwards					<ul> <li>Outsourcing contract with the security company</li> <li>Bank remittance receipt</li> <li>Payroll for hiring security personnel</li> </ul>	Fees paid to mining police, armed group, security personnel, etc., in areas where minerals originate, including mining, trading, transportation, and exporting stage. Note: Payments to private security companies or personnel are generally less risky. The company needs to carefully handle the fees paid to public security (mining

-					
					police, armed group), and if
					necessary, it can be paid through a
					third-party security company.
h.	The ownership (including beneficial ownership) and corporate structure of the exporter, including the names of corporate officers and directors; the business, government or military affiliations of the company and officers;			<ul> <li>Company management structure</li> <li>Summary of Ownership</li> <li>List of directors and senior management</li> <li>List of directors and senior management</li> <li>Description of the affiliation with the government and military</li> </ul>	The exporter's company structure and ownership, the list of directors and senior management, and a description of the affiliation with local government and military.
i.	Mine, quantity, dates and method of extraction (artisanal and small-scale or large-scale mining);			<ul> <li>Mine/mining area's name and/or geographic location</li> <li>Mining volume and mining date</li> <li>Mining method</li> </ul>	A description of the mine/mining area, mining volume, mining date, and mining method. Note: The mining volume needs to be reasonably consistent with the material balance sheet (input materials and raw material inventory).
j.	Locations where minerals are traded, smelted and exported;			• Description of geographic location	A description of the geographic location where the product is smelted and exported.
k.	Export and import documents for smelters and traders.			• Customs documents of import and export	Customs declaration documents for import and export products to indicate the origin, weight, etc.

Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
5.1.3.4 When applicable, avoid cash transactions as much as possible and, if unavoidable, provide verifiable transaction documentation or go through official banking channels;					<ul> <li>Bank statement</li> <li>Transaction Documents/ledger</li> </ul>	Provide formal transaction documents or bank statement; if unavoidable, provide cash management measures and rationale statement of cash transactions.
5.1.3.5 Maintain relevant supporting documents and/or documentation for five years;					<ul> <li>Supporting documents</li> <li>Management measures of documentation record</li> </ul>	Maintain documentation for five years.
5.1.3.6 Incorporate provisions for disclosure of the above information into commercial contracts with direct customers/suppliers;					<ul> <li>Commercial contracts</li> <li>Provisions for information disclosure</li> </ul>	Incorporate disclosure requirements into commercial contracts to be binding.
5.1.3.7 Disclose the above information to recognized regional or global institutional mechanisms established to collect and process information on minerals from "conflict-affected and high-risk areas".					<ul> <li>Records of information disclosure</li> <li>Emails, etc.</li> </ul>	If applicable, provide documentation that the company sends information to a regional or global institutionalized mechanism, such as email, information sheets, etc.

Assessor's assessment conclusions for indicators 5.1.3.4 to 5.1.3.7:

Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
5.1.3.8 Conduct due diligence assessments for the supplier and maintain relevant records before starting business with a new supplier;					<ul> <li>Supplier selection criteria</li> <li>Selection record</li> </ul>	The criteria for supplier selection include due diligence requirements, and the selection process is documented.
5.1.3.9 Carry out material balance accounting, taking into account the total amount of raw materials processed by the enterprise, inventory, loss and sales volume, any differences observed in the material balance accounting process are reasonable;					• Material balance accounting table	Carry out material balance accounting on a 12-month cycle.
5.1.3.10 In some countries, other suggestions may be provided on extractive industry transparency or information disclosure.					<ul> <li>Identification records of the country's relevant transparency requirements</li> </ul>	Consider the country's requirements for transparency.
Assessor's assessment conclusions for indicators 5	5.1.3.8 to	5.1.3.10 if a	applicable:			

## 5.1.3 Establish a system of controls and transparency over the supply chain

 $\c The assessor fills in the assessment description for this requirement here \c I$ 

Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
5.1.4.1 Incorporate corporate due diligence policy into commercial contracts or agreements with suppliers, or formulate supplier codes of conduct to ensure due diligence policies abide by the company and its suppliers are consistent;					<ul> <li>Contract terms</li> <li>Copy of contract</li> <li>Signed Supplier Code of Conduct</li> <li>KYS questionnaire</li> </ul>	Pass the company's requirements for due diligence to suppliers (or subcontractors), and link them to business cooperation through contracts and other methods.
5.1.4.2 Assist suppliers in capacity building and improve their due diligence performance;					<ul> <li>Training record</li> <li>Communication record</li> </ul>	Carry out capacity building with suppliers, such as trainings.
5.1.4.3 If risk mitigation measures as mentioned in Step 3 need to be carried out, a risk management plan should be developed with suppliers;					<ul> <li>Participation records (such as supplier's signed confirmation letter of risk prevention and mitigation measures)</li> <li>Field visit records</li> </ul>	Suppliers are encouraged to participate in the formulation of risk prevention and mitigation measures
5.1.4.4 Can be committed to establishing positive and long-term partnership with direct suppliers to increase its leverage over these suppliers.					• List of subcontracted processors/suppliers (including cooperation period)	Establish a stable cooperative relationship with suppliers to increase its leverage over suppliers.

Assessor's assessment conclusions for indicators 5.1.4.1 to 5.1.4.4:

Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
5.1.4.5 Develop and implement a prequalification process for suppliers. Before cooperating with the supplier, conduct a due diligence assessment of the supplier to identify whether there exist adverse impacts;					<ul> <li>Supplier selection criteria</li> <li>Selection record</li> </ul>	The criteria for supplier selection include due diligence requirements, and the selection process is documented.
5.1.4.6 Understand the obstacles that suppliers fail to meet due diligence requirements, and work together to eliminate these obstacles.					• Engagement record	Strive to identify obstacles that the supplier has failed to meet the requirement in the supplier selection process and to work collaboratively to eliminate these factors.
Assessor's assessment conclusions for indicators5	.1.4.5 to 5	.1.4.6:			<u>.</u>	<u>.</u>

## **5.1.4** Strengthen engagement with suppliers

The assessor fills in the assessment description for this requirement here J

## 5.1.5 Establish a company level grievance mechanism and/or participate an industrial level grievance mechanism

Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
5.1.5.1 Establish a company level grievance mechanism, to provide channels for stakeholders to express their concerns;					<ul> <li>Grievance mechanism</li> <li>Management measures</li> <li>Grievance record and response</li> </ul>	Establish a company level grievance mechanism and management measures.
5.1.5.2 Participate in an industry level grievance mechanism, or other internationally recognized grievance mechanism;					<ul> <li>Identification of industry or other authoritative grievance mechanisms</li> <li>Participation record</li> </ul>	Participate in industry-level or internationally recognized grievance mechanisms.
Assessor's assessment conclusions for indicators 5	5.1.5.1 to 5	5.1.5.2:				

Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
5.1.5.3 The company-level grievance mechanism has core characteristics such as legitimacy, accessibility, predictability and equality, transparency and dialogue-based					<ul> <li>Grievance mechanism</li> <li>Management measures</li> <li>Grievance record and response</li> </ul>	The company's grievance mechanism should have quality assurance, and at a minimum meet the characteristics of legitimacy, accessibility, predictability and

participation;					equality, transparency and dialogue-based participation.
5.1.5.4 The company-level grievance mechanism include the scope of the grievance mechanism, the process and timeline of resolving grievances, responding to handling processes of unsolved complaints, consulting stakeholders on grievance resolution methods, staff and resources allocated for the grievance mechanism, and effect tracking and monitoring the performance of the grievance mechanism.				<ul> <li>Grievance mechanism</li> <li>Management measures</li> <li>Grievance record and response</li> </ul>	The company's grievance mechanism should have quality assurance.
5.1.5.5 Participate in an industry-level grievance mechanism to ensure that the industry-level grievance mechanism is consistent with the company's own situation. At the same time, the company can investigate and understand its own unique situation, and formulate and implement grievance handling measures.				<ul> <li>Identification of industry or other authoritative grievance mechanisms</li> <li>Participation record</li> <li>Corporate grievance handling measures</li> </ul>	Participate in industry-level or internationally recognized grievance mechanisms, but companies still need to formulate special grievance handling measures.
Assessor's assessment conclusions for indicators 5	5.1.5.3 to 5	5.1.5.5:			

## 5.1.5 Establish a company level grievance mechanism and/or participate an industrial level grievance mechanism

 $\c The assessor fills in the assessment description for this requirement here \c J$ 

## **Step 2:** Risk identification and assessment

Summary of assessment results	Breakdown							
	Yes	Need improvement	NO	Zero tolerance	Not applicable			
S2 Risk identification and assessment								

Note: After the assessor completed the assessment of "Step 2: Risk Identification and Assessment", the assessment results can be summarized in this table.

# 5.2.1 Conduct warning signs review, and identify the scope of the risk assessment of the mineral supply chain based on the results of warning signs review

	Indicator	Yes	Need improve ment	No	N/A	Assessor's summary description of the indicator		
5.2.1.1 Co supply cha	nduct warning signs review of the in					The assessor's assessment conclusion on the performance of the enterprise in this indicator:		
	Element	Yes	Need improve ment	No	N/A	Description of supporting document/evidence Explanation		
Red flag locations of mineral origin and transit	The screening process of red flag includes: 1.The mineral originates from Conflict-Affected and High-Risk Areas;					<ul> <li>Procedure for identifying Conflict-Affected and High-Risk Areas(including references)</li> <li>Identification checklist of Conflict-Affected and High-Risk Areas</li> <li>Identification checklist of Conflict-Affected and High-Risk Areas</li> <li>Certificates of origin/customs declaration documents/transportation documents of all minerals</li> <li>Procedure for identifying Conflict-Affected and High-Risk Areas</li> <li>Certificates of origin/customs</li> <li>Such areas.</li> </ul>		

 $<sup>^2</sup>$  At present, there is no universal definition of Conflict-Affected and High-Risk Areas (CAHRAs). The OECD provides the following characteristics of such areas: Areas identified by the presence of armed conflict, widespread violence, including violence generated by criminal networks, or other risks of serious and widespread harm to people. Armed conflict may take a variety of forms, such as a conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation, or insurgencies, civil wars. High-risk areas are those where there is a high risk of conflict or of widespread or serious abuses. Such areas are often characterized by political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure, widespread violence and violations of national or international law.

	2. The transportation route of the mineral passes Conflict-Affected and High-Risk Areas;			<ul> <li>Identification list of all minerals</li> <li>List or description of transportation routes for all minerals</li> <li>The transportation of raw materials passes through Conflict-Affected and High-Risk Areas.</li> </ul>
Red flag locations of mineral origin and	3. The minerals are claimed to originate from a country that has limited known reserves, likely resources or expected production levels;			<ul> <li>The reserves and mining volume of relevant minerals in the country of origin</li> <li>Reports from research organization, industry organization, related NGO, media</li> <li>The declared volumes of mineral from that country are out of keeping with its known reserves or expected production levels.</li> </ul>
transit	4. The minerals are claimed to originate from a country in which minerals from conflict-affected and high-risk areas are to transit;			<ul> <li>Certificate of Origin of Minerals</li> <li>Transportation route list or description</li> <li>Transportation route list or</li> </ul>
	5. The minerals are claimed to originate from mixed recyclable sources and have been processed in <i>Conflict-Affected and High-Risk</i> <i>Areas</i> ;			<ul> <li>Certificate of Origin of Minerals</li> <li>List of mining areas (including mining area name, geographic location, etc.)</li> <li>The recycled mineral materials are processed in Conflict-Affected and High-Risk Areas.</li> </ul>

Supplier	1. Suppliers or other known upstream companies operate in above-mentioned warning signs locations, or have shareholder or other interests in suppliers from above mentioned warning signs locations;			<ul> <li>Supplier list or directory (including name, geographic location, investment relationship, etc.)</li> <li>Supplier's purchasing records</li> </ul>	Suppliers operate in areas where warning signs are identified, or do not operate in these areas but are shareholders of suppliers in these areas, or purchase more than 50% of their raw materials.
red flags	2. Suppliers or other upstream companies are known to have sourced mineral from a warning signs location of origin and transit in the last 12 months.			<ul> <li>Supplier list</li> <li>Supplier's origin information of all raw materials in the past 12 months</li> </ul>	In the past twelve months, the supplier has purchased raw materials from areas where red flags identified. Note: Even if these raw materials have not entered the supply chain of your own company.
Red flags in specific	1. Mineral-related activities have the potential to contribute to conflict or abuses of rights			<ul> <li>UN report</li> <li>NGO report</li> <li>Media reports etc.</li> </ul>	In addition to contributing conflicts, mining, trading, processing, and exporting activities have contributed to abuses of human rights and labor rights.
circumsta nce	2. Not be able to identify the mineral's location of origin and transit.			• Unable to show the origin and transportation route information	Unable to show the origin and transportation route information

Indicator	Yes	Need improve ment	No	N/A	Assessor's summary description of the indicator	
5.2.1.2 Develop and implement information verification procedures					The assessor's assessment conclusion on the performance of the enterprise in this indicator:	
Element	Yes	Need improve ment	No	N/A	Description of supporting document/evidence Explanation	
<ul> <li>a. Confirm that the name, type, weight, composition and quality of the mineral raw materials received are consistent with the transaction documents;</li> </ul>					<ul> <li>Transaction documents</li> <li>Warehousing / warehousing documents / ledger</li> <li>Customs documents</li> <li>Or other forms of record documents</li> </ul>	
<ul> <li>b. Investigate, handle and resolve any discrepancies or inconsistencies found in the aforementioned warning signs review;</li> </ul>					<ul> <li>Warning signs review results</li> <li>Information supporting documents</li> <li>It is necessary to ensure that the review results of three warning signs are consistent with the information provided.</li> </ul>	
<ul> <li>c. The reserves, output and export data of the country and/or region of origin of mineral raw materials are reasonable;</li> </ul>					<ul> <li>Transaction file</li> <li>Customs documents</li> <li>Research organization reports, industry organization reports, related NGO reports, media reports</li> <li>The stated quantitative data is basically consistent with the existing public data, or there is reasonable explanation.</li> </ul>	
<ul> <li>d. Develop methods or procedures that can identify and determine Conflict-Affected and High-Risk Areas</li> </ul>					<ul> <li><i>CAHRAs identification program</i></li> <li><i>List of identification results</i></li> <li>Develop CAHRAs identification procedures, which need to include reference, reviewing and updating</li> </ul>	

(CAHRAs), determine the source of			frequency, etc.
information to be referred to, and			
determine the frequency of reviewing			
and updating the CAHRAs list.			

Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
5.2.1.3 The warning signs screening process can refer to the information released by highly recognized international institutions. The sources of information can include reports from governments agencies, international organizations, civil society organizations, worker representatives and trade unions, national human rights institutions, think tank, the media, or other experts. If the information is incomplete, the opinions of relevant stakeholders and experts can be consulted;					• Publicly reports, indexes, etc.	The information referenced by the CAHRAs identification procedure is credible and highly authoritative.
5.2.1.4 Consider the information collected by the grievance mechanism;					• Grievance Card/ Grievance Record	The source can be the information collected by the grievance mechanism.
5.2.1.5 Once major adjustments are made, such as operating or purchasing in a new country, developing new product lines that are significantly different from existing product lines, changing product materials, reorganizing					<ul> <li>Social and environmental impact assessment report</li> <li>Product line change description</li> </ul>	Information collection is continuously updated and dynamically changing.

or participating in new forms of business relationships (such as mergers, acquisitions, new customers and new markets), etc., the company need to update the scope of information collected;							
5.2.1.6 In some countries, certain information collection requirements may also be imposed on extractive industry transparency or information disclosure.					• Identification list	Identify the country's requirements for transparency and information disclosure.	
Assessor's assessment conclusions for indicators 5.2.1.3 to 5.2.1.6:							

#### 5.2.1 Conduct warning signs review, and identify the scope of the risk assessment of the mineral supply chain based on the

#### results of warning signs review

 $\c The assessor fills in the assessment description for this requirement here \c I$ 

5.2.2 <u>When warning signs are identified in the 5.2.1 warning signs review</u>, companies shall conduct an on-the-ground assessment of the corresponding supply chain.

Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation	
5. 2. 2. 1 Understand the factual background of Conflict-Affected and High-Risk Areas (CAHRAs) including countries of origin, neighboring countries, transit countries (including possible shipping routes and locations of extraction, trade, processing, export, etc. );					<ul> <li>On-the-ground assessment plan</li> <li>Question list of on-the-ground assessment /questionnaire</li> </ul>	Carry out on-the-ground assessments if CAHRAs are involved. The on-the-ground assessments need to assess the background of the origin, as well as the following supply chain situation.	
Assessor's assessment conclusions for this indicator:							

Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence
5.2.2.2 Based on the control and transparency system (including the chain of custody or traceability information of the supply chain) established in 5.1.3, companies should understand the specific conditions of the entire supply chain (extraction, trade, transport, export, etc.) through on-the-ground assessment. Including:					The assessor's assessment conclusion on the performance of the enterprise in this indicator:

	Element	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
a.	Country and region of origin of raw materials;					<ul> <li>Certificate of Origin</li> <li>Business registration and tax registration information</li> <li>Mining license</li> <li>Mine location</li> </ul>	Description of origin information
b.	Names and addresses of upstream players, including mining areas, local traders, warehouses, trading markets, smelters, exporters, international traders, etc.;					<ul><li>Supplier profile</li><li>Supplier directory</li></ul>	Information description of upstream supplier
C.	Shipment routes and modes of transport;					<ul> <li>Shipment documents/contracts</li> <li>Description of shipment information</li> </ul>	Shipment information description
d.	Name and type of mineral or metal;					Raw material purchase     list/ledger	Information description of raw material
e.	Taxes, fees or royalties paid to the government for mineral extraction, trade, transportation, export;					<ul> <li>Proof of payment</li> <li>Tax certificate</li> </ul>	Information on taxes and fees paid to the government for extraction, trade, transportation, export, etc.
f.	Any other payments to government officials for mineral extraction, trade, transportation, and export;					<ul> <li>Payment instructions</li> <li>payment receipt</li> </ul>	Information on payments to government officials for extraction, trade, transportation, export, etc.
g.	All taxes and any other payments to public or private security forces or other groups at all points in the supply chain					<ul><li>Payment instructions</li><li>payment receipt</li></ul>	Information on payments to public, private security forces or other groups for extraction, trade,
	since the start of mineral extraction;				transportation, export, etc.		
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h.	Ownership (including beneficial ownership) and company structure including the names of company officers and directors, and its affiliation with the government or military;			<ul> <li>Company structure</li> <li>Ownership information description</li> </ul>	Governance structure of local exporters in raw material producing countries, and relations with government and military.		
i.	Mine, volume of extraction, date and method of extraction (artisanal mining, small and medium-scale mining or large-scale mining);			• Description of the mine, and especially how it is mined	Introduction to the mining areas.		
j.	Locations of mineral trade, smelting, and export;			• Location information for each point other than extraction in the country of origin of the raw material	Raw material transactions (eg: trading markets), and locations of primary processing and export.		
k.	Export and import documents for smelters and traders;			• Customs declaration documents	Import and export information of raw material		

Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence		
5.2.2.3 Set up an on-the-ground assessment team to carry out on-the-ground assessments. The personnel conducting on-the-ground assessments should have the following qualifications:					The assessor's assessment conclusion on the performance of the enterprise in this indicator:		
Element	Yes	Need improve	No	N/A	Description of supporting document/evidence	Explanation	

		ment			
a.	Have expertise in the relevant risks being assessed (e.g. human and labour rights, security, health and safety, anti-corruption) and methods to identify actual and potential adverse impacts and maintain the independence of the assessment.			<ul> <li>Staff resume</li> <li>Assessment method</li> </ul>	Competency requirements for on-the-ground assessors.
b.	Knowledge of international and national standards related to risks and adverse impacts;			• Standard or requirement identification documents	Standard documents used as the basis for on-the-ground assessment.
с.	Ability to conduct assessments locally (e.g.: language skills, understanding of local history and culture, etc.).			• Staff resume	Competency requirements for on-the-ground assessors.

Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
5.2.2.4 The assessment should be carried out in accordance with all Type 1 risks in Chapter VI;					• Risk list	The risk scope of on-the-ground assessment.
5.2.2.5 Companies can also conduct on-the-ground assessments by participating in industrial actions, but the responsibility of individual company for carrying out assessment and decision-making should be retained;					• Description of assessment method	Whether the assessment is implemented in collective or individual way.

5.2.2.6 Maintain and update information regularly.					• Assessment cycle	Description of the cycle of on-the-ground assessment.				
Assessor's assessment conclusions for indicators 5.2.2.4 to 5.2.2.6:										

Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
5.2.2.7 If the on-the-ground assessment is conducted by participating in industrial actions, the company should follow the team's assessment recommendations and take actions based on the recommendations. If the scope of industrial assessment cannot meet all assessment demands of the company, the actions need to be implemented by the company individually.					• Assessment report	Participating in a collective assessment requires respect and compliance with the conclusions of the collective assessment; if the collective assessment cannot meet all the information requirements of the company, individual assessments need to be conducted for supplementing or replacing it.

Assessor's assessment conclusions for this indicator:

## 5.2.2 When red flags are identified in the 5.2.1 warning signs review, companies should conduct an on-the-ground assessment

#### of the corresponding supply chain.

 $\c The assessor fills in the assessment description for this requirement here \c I$ 

5.2.3 Assess risks in the supply chain. Companies should identify and assess supply chain risks against the due diligence policy.										
Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence					
5.2.3.1 Review applicable standards, the review scope includes:					The assessor's assessment conclusion on the performance of the enterprise in this indicator:					
Element	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation				
<ul> <li>a. Review applicable standards, including the principles and standards of the company's supply chain policy;</li> <li>Note: Assessors can conduct the assessment refer to the following</li> <li>"Instruction for the assessor to evaluate the quality of on-the-ground assessment</li> </ul>					<ul> <li>Assessment plan</li> <li>Assessment report</li> </ul>	Description of assessment scope including four major types of risks listed in the model policies in Appendix 1 of the Chinese Guidelines in principle.				

CO	nducted by the company";				
b.	National laws of the countries where the company is domiciled or publicly-traded (if applicable), and national laws of the countries from which the minerals originate, and national laws of transit or re-export countries;			• Identification documents required by the laws of the host country	The assessment scope includes whether it meets the legal requirements of the host country.
C.	Legal instruments governing company operations and business relations, such as financing agreements, contractor agreements, and supplier agreements;			• Identification documents for binding requirements	Identification of other binding requirements except the laws.
d.	Other relevant international instruments, such as the OECD Guidelines for Multinational Enterprises, international human rights and humanitarian law, etc.			• Identification document/compilation of binding requirements	Identification of binding requirements such as international instruments to be followed.

Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
5.2.3.2 Determine whether the circumstances in the supply chain meet the relevant standards. Any reasonable inconsistency between a factual circumstance and a standard should be considered a risk with potential adverse impacts.					• Assessment report	Carry out benchmarking analysis to analyze whether there is any inconsistency (risk).

Assessor's assessment conclusions for this indicator:

5.2.3 Assess risks in the supply chain. Companies should identify and assess supply chain risks against the due diligence policy.

【The assessor fills in the assessment description for this requirement here】

#### Instruction for the assessor to evaluate the quality of on-the-ground assessment conducted by the company

Note: The following first four types of risks are proposed in Annex II of the OECD Guidance (Third Edition) Model Policy, and Annex I (or Type I risks) of CCCMC's Chinese Guidelines (Second Edition).

All companies need formulate a supply chain due diligence policy, which is reflected in the assessment content of step 1. For companies that trigger the "red flag", they need carry out on-the-ground assessment. This "Instruction" is a reference for the assessor to evaluate the quality of the company's on-site evaluation. It should be noted that the assessor does not need to fill in this part. This part is only to provide the assessor with an evaluation example to illustrate the similar method of the assessed company's on-the-ground evaluation, practice or level is satisfactory.

When the epidemic situation is severe, the rationality of remote assessment can be considered.

The following content provides: 1. A sample of risk assessment methods based on likelihood and severity; 2. Examples of good practices for developing on-the-ground assessment checklists or tools. This does not mean that companies are required to take completely consistent measures, but rather to assist the assessor in evaluating the quality of the on-the-ground assessment carried out by the companies.

The risk matrix below provides an overall assessment of the applicable risk types, such as "5E". In general, the risk marked in red refers to a very serious negative impact and is very likely to occur or has occurred; the risk marked in orange refers to a greater probability of occurrence and a greater risk; the risk marked in yellow refers to the possibility of causing negative impact, but the negative impact is controllable; the risk marked in green refers to low possibility of occurrence, and the negative impact is not obvious.

				Impact/Severity										
			type of risk is not obvious, and there is almost no change in decision-making on external	which are perceived by external parties to be dissatisfied, and have mild adverse impacts on the company's own operations and business relationships.	impact, create obstacles to the realization of legal or legitimate rights and interests of external parties, and have certain adverse impacts on the company's own operations and business relationships, but they can be	obvious substitution effects on the legal or legitimate rights and interests of external parties, leading to external (downstream, media, NGO, government, etc.)	cause personal injuries and deaths and other							
			Not obvious (A)	Mild (B)	Moderate (C)	Obvious (D)	Severe (E)							
Possibility	Such risks are most likely to occur. Inquiries have already appeared from the external parties, and the company has not yet established a response mechanism.	Most likely (5)	5A	5B	5C	5D	5E							

Such risks are very likely to occur, and basically occur when certain conditions are met.	Very likely (4)	4A	4B	4C	4D	4E
Such risks are likely to occur, have a history of occurrence, and may occur under certain conditions and events.	Likely	3A	3B	3C	3D	3E
This type of risk has a probability of occurring under the inducement of rapid environmental changes, political incidents, and human-made major operational errors, but the probability of occurrence is very small under normal circumstances.	Slightly possible	2A	28	2C	2D	2E
Such risks are almost impossible to occur.	Almost impossible (1)	14	1B	1C	1D	IE

Type 1 risks—risks associated with serious abuses									
		Need							
Indicator	Yes	improve ment	No	N/A	Description of supporting document/evidence	Explanation			
1.1 The company has a list of employees <sup>3</sup>					• List of employees	Including all employees ( <mark>Chinese</mark> and international employees, contract workers, dispatch workers, etc.).			

<sup>&</sup>lt;sup>3</sup> Employee list includes the name, gender, ID card/passport and other information of hired employees, dispatched, and outsourced employees.

1.2 The company has established procedures for identifying the age of employees			• Introduction of employee identification procedures or methods during recruitment	Recognize that the age of employees meets the minimum working age requirements of the country in which they are located, and avoid child labor.
1.3 The company has established child labor prevention and remedial procedures			<ul> <li>Child labor prevention and remedial procedures</li> <li>Personnel recruitment and hiring procedures</li> </ul>	Procedures to prevent child labor and procedures to implement remedial measures once hired.
1.4 The company install fences and carry out access control management, which can effectively block children from entering			<ul> <li>Fence installation description</li> <li>Access control management system</li> </ul>	The management measures taken for fence installation and accessing the mining area to prevent improper entry of non-company personnel, including children.
1.5 The company has arranged effective security patrols, which can effectively prevent children from entering			<ul> <li>Security Management Measures</li> </ul>	Security patrol measures in mining areas have been taken to prevent improper entry of non-company personnel, including children.
1.6 The human resource management procedures established by the company include special protection measures for female employees <sup>4</sup>			<ul> <li>Special protection measures for female employees</li> <li>Recruitment and hiring procedures</li> </ul>	The selection of work types for female employees, special protections during childbirth and breastfeeding, and anti-discrimination measures are in order to comply with the legal requirements of the country where they are located.
1.7 The company has established a			• Scope of the grievance mechanism	Measures for the management of female employees' incidents, such

<sup>&</sup>lt;sup>4</sup> For more information on gender equality in the workplace, companies can refer to the International Labor Organization and UN Women: Empowering Women-Corporate Gender Equality Policies and Practices: https://www.ilo.org/wcmsp5/groups/public/---ed\_emp/---emp\_ent/---multi/documents/publication/wcms\_756721.pdf

grievance/communication mechanism including			• Incidents processing record	as sexual harassment and sexual
sexual harassment and sexual violence incidents				violence.
1.8 The company has established a working hour system that meets the legal requirements of the country where it is located			<ul> <li>Identification checklist for working hours required by the host country</li> <li>Company working hour system</li> </ul>	The working hour system complies with the legal requirements of the country where it is located, avoiding forcing employees to work overtime involuntarily.
1.9 The employees can voluntarily decide to work overtime or not to work overtime			<ul> <li>Working hours system</li> <li>Attendance Record</li> <li>Employee Interview Record</li> </ul>	The working hour system complies with the legal requirements of the country where it is located, avoiding forcing employees to work overtime involuntarily.
1.10 The employees can voluntarily decide to keep their ID/passport			<ul><li>On-site observation</li><li>Employee Interview Record</li></ul>	Avoid the risk of forced labor caused by restricting the movement of employees. <sup>5</sup>
1.11 The employees can freely decide to leave the factory			<ul> <li>On-site observation</li> <li>Employee Interview Record</li> </ul>	Avoid the risk of forced labor caused by restricting the movement of employees.
1.12 The employees can freely decide to use the restroom or drink water			<ul> <li>On-site observation</li> <li>Employee Interview Record</li> </ul>	Avoid the risk of forced labor caused by restricting the movement of employees.

Type 2 risks – risks associated with non-state armed groups:									
Indicator	Yes	Need improve	No	N/A	Description of supporting document/evidence	Explanation			

<sup>5</sup> Regarding the risk of forced labor, companies can refer to the International Labor Organization's "Forced Labor Indicators" https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/---ilo-beijing/documents/publication/wcms\_241879.pdf

	ment			
2.1 Non-state armed groups or their affiliates <sup>6</sup> have not controlled <sup>7</sup> the mining area			<ul> <li>CCTV record</li> <li>On-site observation</li> <li>Interview record</li> </ul>	Identify the relationship between         non-state armed groups or their         affiliates and the mining areas
2.2 Non-state armed groups or their affiliates have not illegally collected taxes or blackmail at the mining area or entry/exit <sup>8</sup>			<ul> <li>CCTV record</li> <li>On-site observation</li> <li>Interview record</li> </ul>	Identify whether non-state armed groups or their affiliates have performed improper conduct.
2.3 There are no non-state armed groups or their affiliates on the transportation route to the company's mining site and production area			<ul> <li>CCTV record</li> <li>On-site observation</li> <li>Interview record</li> </ul>	Identify whether non-state armed groups or their affiliates are located along the transportation routes of raw materials or product.
2.4 Non-state armed groups or their affiliates have not controlled transportation routes			<ul> <li>CCTV record</li> <li>On-site observation</li> <li>Interview record</li> </ul>	Identify whether non-state armed groups or their affiliates control transportation routes.
2.5 Non-state armed groups or their affiliates have not illegally collected taxes or extorted during transportation process			<ul> <li>CCTV record</li> <li>On-site observation</li> <li>Interview record</li> </ul>	Identify whether non-state armed groups or their affiliates illegally collect taxes or extort during transportation process.
2.6 No non-state armed groups have been stationed in the trading place of the company (and the supplier, outsourced processor, customer)			<ul> <li>CCTV record</li> <li>On-site observation</li> <li>Interview record</li> </ul>	Identify whether there are non-state armed groups or their affiliates at the transaction point.

<sup>&</sup>lt;sup>6</sup> Refer to the UN Security Council's resolutions on non-state armed groups. "Affiliates" include traders, wholesalers, intermediaries and other parties in the supply chain that directly cooperate with armed groups to facilitate mining, trading, and processing of minerals.

<sup>&</sup>lt;sup>7</sup> "Control" of mines, transportation routes, points where minerals are traded and upstream actors in the supply chain means i) overseeing extraction, including by granting access to mine sites and/or coordinating downstream sales to intermediaries, export companies or international traders; ii) making recourse to any forms of forced or compulsory labour to mine, transport, trade or sell minerals; or iii) acting as a director or officer of, or holding beneficial or other ownership interests in, upstream companies or mines.

<sup>&</sup>lt;sup>8</sup> "Extort" from mines, transportation routes, points where minerals are traded or upstream companies means the demanding, under the threat of violence or any other penalty, and for which the person has not voluntarily offered, sums of money or minerals, often in return for granting access to exploit the mine site, access transportation routes, or to transport, purchase, or sell minerals.

2.7 Non-state armed groups or their affiliates have not controlled transactions or illegally levied taxes or extorted			<ul> <li>CCTV record</li> <li>On-site observation</li> <li>Interview record</li> </ul>	Identify whether non-state armed groups or their affiliates control transactions or illegally collect taxes or extort.
2.8 The company has not purchased minerals from non-state armed groups or their affiliates			<ul> <li>CCTV record</li> <li>On-site observation</li> <li>Interview record</li> </ul>	Identify the company's relationship with non-state armed groups or their affiliates.
2.9 The company has not made any payments to non-state armed groups or their affiliates.			<ul> <li>CCTV record</li> <li>On-site observation</li> <li>Interview record</li> </ul>	Identify the company's relationship with non-state armed groups or their affiliates.
2.10 The company has not provided logistical support or equipment to non-state armed groups or their affiliates			<ul> <li>CCTV record</li> <li>On-site observation</li> <li>Interview record</li> </ul>	Identify the company's relationship with non-state armed groups or their affiliates.

Type 3 risks – risks associated with public or private security forces:									
Indicator	Yes	Need improvement	No	N/A	Description of supporting document/evidence	Explanation			
3.1 The selection criteria for security personnel/teams includes provisions on respect for human rights					<ul> <li>Security personnel selection criteria</li> <li>Interview Record</li> <li>Screening procedures</li> </ul>	Screening security personnel or service providing companies must be based on provision of respecting human rights.			
3.2 The company has screened whether it has a record of human rights violation <u>before</u> hiring security personnel/teams					<ul> <li>Interview Record</li> <li>Screening procedures</li> </ul>	Do not employ security companies and personnel that has violated human rights.			
3.3 The company has provided training to					<ul> <li>Training Record</li> <li>Interview Record</li> </ul>	Security personnel or service providing companies need to be			

security personnel/teams; training content includes respect for human rights				knowledgeable about respecting human rights and avoiding conflicts.
3.4 If the company's mining sites and factories have public security forces (mining police, armed groups, etc.), the selection criteria for public security forces include provisions on respect for human rights.			<ul> <li>List of security staff</li> <li>Security personnel selection criteria</li> <li>Contract provisions</li> </ul>	Screening security personnel or service providing companies must be based on provision of respecting human rights.
3.5 The company has screened whether it has a record of human rights violations before hiring or indirectly hiring public security forces.			<ul> <li>Interview Record</li> <li>Screening procedures</li> </ul>	Public security forces and personnel that violate human rights must not be employed.
3.6 The company has provided training to the public security armed forces; training content includes respect for human rights.			<ul> <li>Training Record</li> <li>Interview Record</li> </ul>	Security personnel need to be knowledgeable about respecting human rights and avoiding conflicts.
3.7 The company can provide payment for the public security armed forces.			<ul> <li>List of fees or receipts</li> <li>Contract</li> <li>Bank transfer records</li> </ul>	Cost transparency or solutions to increase transparency.
3.8 Company's security personnel have never had any physical or armed conflicts with employees (including employees at the mining area, contract employees, dispatched employees, etc.).			<ul> <li>Interview Record</li> <li>Documents review</li> <li>On-site observation</li> </ul>	Security personnel need to respect human rights and avoid conflicts.
3.9 The company's security personnel have never had physical or armed conflicts with residents of surrounding communities.			<ul> <li>Interview Record</li> <li>Documents review</li> <li>On-site observation</li> <li>Grievance mechanism</li> </ul>	Security personnel need to respect human rights and avoid conflicts.

Type 4 risks – tax payment and information disclos	sure, bribe	ery, money	laundering	and misrep	resentation of the origin of mine	erals:
Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
4.1 The company pays taxes, fees and royalties to the government on time					<ul> <li>Tax payment proof</li> <li>Receipt</li> <li>Cost vouchers</li> </ul>	Taxes and fees required to be paid to the government.
4.2 The company has never been fined due to overdue payment of taxes, fees and royalties to the government.					<ul> <li>Fine file</li> <li>Government notice</li> <li>Interview Record</li> </ul>	Taxes and fees required to be paid to the government.
4.3 The company can provide certificates of origin or instructions for all minerals or products.					• Certificates of origin	It is necessary to prove that the raw materials are all self-produced minerals and there is no outsourced ore.
4.4 The company can provide inventory records, sales records and/or customs documents (export) for all products.					<ul> <li>Inventory Record/Ledger</li> <li>Material balance sheet</li> <li>Sales Contract</li> <li>Customs declaration</li> </ul>	It is necessary to prove that there is no risk of smuggling or money laundering in product sales.
4.5 The company has formulated the procedure of anti-bribery and corruption					• Anti-corruption procedure	Formulate anti-corruption procedures to prevent corruption.
4.6 Anti-bribery or bribery has not occurred to employees of the company.					<ul> <li>Interview Record</li> <li>Grievance mechanism</li> <li>Court decision</li> </ul>	It is necessary to prevent employees from participating in anti-bribery and bribery.
4.7 No bribery occurred during the transportation					<ul> <li>Toll receipt</li> <li>Transport route description</li> </ul>	Respond systematically to the occurrence of petty corruption

by the company.				incidents.
4.8 The company has formulated an anti-money laundering policy.			• Anti-money laundering policy	The risk of money laundering needs to be prevented.

### 5.2.8 Assess the linkage between the company and the actual or potential adverse impacts

Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
5.2.8.1 Solicit opinions from business relationships, other related companies and other relevant stakeholders;					<ul><li>List of identified related party</li><li>Consultation record</li></ul>	Solicit opinions from relevant parties during the evaluation process
5.2.8.2 Consult the opinions of affected stakeholders or their legal representatives;					<ul><li>List of identified stakeholders</li><li>Consultation record</li></ul>	Especially comments from affected stakeholders.
5.2.8.3 Seek necessary professional comments through internal or external consultation;					Consultation record	Seek comments from experts.
5.2.8.4 If the affected stakeholders disagree with the company's assessment of its actual or potential adverse impacts, it will sincerely cooperate with proper mechanisms designed to help resolve differences and provide remedies.					<ul> <li>List of identified stakeholders</li> <li>Consultation record</li> <li>Resolving results</li> </ul>	Seek comments from affected parties, and responding measures

#### 5.2.8 Assess the linkage between the company and the actual or potential adverse impacts

 $\c The assessor fills in the assessment description for this requirement here \c I$ 

5.2.9 Carry out risk rating									
Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation			
5.2.9.1 Identify which potential or actual impacts can be eliminated immediately or mitigated, at least mitigated to a certain extent (such as updating contract terms with suppliers, revising assessment agreements, etc.);					• Risk Assessment Report	Carry out risk assessment to determine priority or emergency management and risks.			
5.2.9.2 Based on the company's assessment results of its own adverse impacts, prioritize actions to address the most important impacts;					• Risk Assessment Report	Determine priority or emergency management and risk types.			
5.2.9.3 Regarding impacts relevant to business relationships, assess to what extent the business relationship has appropriate policies and processes to identify, prevent and mitigate related risks;					• Description of business relationship	Understand their own leverage through the analysis of business relationships.			
5.2.9.4 If it is impossible to eliminate actual and potential impacts directly related to business operations, products or services due to business relationships (or these impacts cannot be eliminated as much as possible), assess the likelihood and severity of the identified impacts					• Risk Assessment Report	Determine the order of risk treatment according to likelihood and severity.			

or risks to clearly understand what prioritized actions to address the issues. Once the most important impact is identified and addressed, the company should continue to address the relatively minor impact;				
5.2.9.5 Solicit the opinions of business relationships, other related companies, and affected or potentially affected stakeholders and right holders on the decision of priority ranking.			<ul> <li>Risk Assessment Report</li> <li>Comment consultation record</li> </ul>	Solicit opinions from relevant parties on the priority order of risk management.

### 5.2.9 Carry out risk rating

 $\c The assessor fills in the assessment description for this requirement here \c I$ 

# **Step 3:** Risk prevention and mitigation

	Summary of assessment results	Breakdown							
		Yes	Need improvement	No	Zero tolerance	Not applicable			
<b>S</b> 3	Risk prevention and mitigation								

Note: After completing the assessment under Step 3: Risk prevention and mitigation, the assessor can summarize the results in this table.

5.3.1 Report risk assessment results internally									
Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation			
5.3.1.1 Report the risk assessment results identified in Step 2 to designated senior management in charge of due diligence. The risk assessment results should include the actual and potential risks identified in the supply chain risk assessment.					<ul> <li>Reporting record</li> <li>Aproval record (if there is)</li> </ul>	Report the risk assessment and its results internally.			

### **5.3.1 Report risk assessment results internally**

【The assessor fills in the assessment description for this requirement here】

5.3.2 Develop and adopt risk management plan										
Indicator	Yes	Need improve ment	No	N/A	Assessor's summary description of the indicator					
5.3.2.1 Develop and adopt a risk management plan, which should cover all the risks identified					The assessor's assessment conclusion on the performance of the enterprise in this indicator:					

and assessed in Step 2. The risk management plan should have the following elements:						
Element	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
a. Consult suppliers and affected stakeholders and agree on the strategy for risk mitigation in the risk management plan (see 5.3.2.2);					<ul> <li>Risk management plan</li> <li>Informed consent signed by related parties</li> </ul>	Develop a risk management plan, and the risk management plan has been consulted and agreed upon by relevant stakeholders.
<ul> <li>b. The risk management plan should include measurable risk mitigation strategies that aims to incrementally improve performance within a reasonable time frame;</li> </ul>					• Risk management plan	The content of the risk management plan should include risk mitigation strategies, timeline, and monitoring indicators.
c. Clearly state performance objectives within a reasonable timeframe, including qualitative and/or quantitative indicators to measure improvement;					• Risk management plan	The content of the risk management plan should include performance objectives and monitoring indicators.
d. The risk mitigation strategy should be adjusted according to the company's specific suppliers and the contexts of its operations;					• Risk management plan	The risk management plan can be adjusted as circumstances change
e. The company should approve the risk management plan to make it effective;					• A signed risk management plan	The risk management plan is signed by the interdepartmental committee or relevant principal

f.	With due regard to business confidentiality and other competitive concerns, the risk management plan developed by upstream companies should be disclosed, and sufficient time should be provided for affected stakeholders to comment and feedback on the risk management plan.					<ul> <li>Public links or other means</li> <li>Documents reviewed and fed back by relevant stakeholders</li> </ul>	Records of stakeholder participation in the risk management plan
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Indicator	Yes	Need improve ment	No	N/A	Assessor's summary description of the indicator
<ul> <li>5.3.2.2 In the risk management plan, companies should manage risk by using the following mitigation strategies:</li> <li>a. continuing trade throughout the course of major risk mitigation efforts;</li> <li>b. temporarily suspending trade while pursuing ongoing major risk mitigation;</li> <li>c. disengaging with a supplier in cases where mitigation measures fail or mitigation appears not feasible or unacceptable.</li> </ul>					The assessor's assessment conclusion on the performance of the enterprise in this indicator:

## 5.3.2 Develop and adopt risk management plan

The assessor fills in the assessment description for this requirement here J

5.3.3 Implement risk management plan, monitor and track performance of risk mitigation strategies										
Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation				
5.3.3.1 Jointly implement the risk management plan, monitor and track performance of risk mitigation measures in cooperation with stakeholders;					• Implementation record of the risk management plan	Monitor the implementation of the risk management plan.				
5.3.3.2 In the process of implementing the risk management plan, if major changes in risks are identified, the risk management plan should be adjusted accordingly;					• Implementation record of the risk management plan	The implementation of the risk management plan can be adjusted according to changes in the environment.				
5.3.3.3 Cooperate and/or consult with affected stakeholders, local and central governments, upstream companies, international or civil society organizations on the implementation, monitoring, performance tracking and other measures of the risk management plan;					<ul> <li>Implementation record of the risk management plan</li> <li>Consultation/communication record</li> </ul>	Maintain communication with relevant parties on the implementation process of the risk management plan.				
5.3.3.4 This can be done by establishing or supporting local community-monitoring networks;					<ul> <li>Implementation record of the risk management plan</li> <li>Community engagement plan</li> </ul>	The risk management plan may include community engagement and supervision.				

5.3.3.5 Report to designated senior managers and confirm whether the risk management plan needs to be adjusted.				•	Implementation record of the risk management plan Adjustment record of the risk management plan	The implementation of the risk management plan can be adjusted according to changes in the environment.
Assessor's assessment conclusions for this indicate	or 5.3.3.1	to 5.3.3.5:				

Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
5.3.3.6 The risk management plan includes the identification and management of risks that violate specific national laws and regulations, sanctions, etc., and communicate with specific customers if necessary;					• Identification of legal and regulatory information	Identify the sanctions and other information of a specific country based on the actual situation to avoid commercial risks.
Assessor's assessment conclusions for this indicate	or:					

Indicator	Yes	Need improve ment	No	N/A	Assessor's summary description of the indicator
5.3.3.7 The company demonstrates the					The assessor's assessment conclusion on the performance of the

effectiveness and transparency of the risk management plan according to the following suggestions:					enterprise in this indicator:	
Element	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
a. Approval of the management of the company;					• Signed risk management plan	The risk management plan is internally approved.
b. The affected stakeholders are involved;					• Record of affected parties' involvement	External parties are involved with the risk management plan, especially the participation of affected parties.
c. On-the-ground investigation and monitoring process;					• Implementation record of the risk management plan	The risk management plan is monitored in real time.
d. Disclose the risk management plan with due regard to business confidentiality;					• Evidence of being public accessible (e.g. URL)	Risk management plan is public accessible.
e. Take additional risk managemen actions such as temporary suspension disengaging or strengthening leverage.					<ul> <li>Additional management measures</li> </ul>	The implementation of the risk management plan can be adjusted according to changes in the environment.

### 5.3.3 Implement the risk management plan, monitor and track performance of risk mitigation strategies

[The assessor fills in the assessment description for this requirement here]

5.3.4 Supplementary assessment of risks that need to be mitigated. Supplementary assessments can also be conducted after actual circumstances have changed

Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
5.3.4.1 After implementing a risk mitigation strategy, conduct monitoring and additional assessment for risks requiring mitigation, after a change of circumstances or supply chain.					• Necessity statement of additional assessment, etc.	The implementation of the risk management plan can be adjusted according to changes in the environment.

5.3.4 Supplementary assessment of risks that need to be mitigated. Supplementary assessments can also be conducted after

#### actual circumstances have changed

 $\c The assessor fills in the assessment description for this requirement here \c I$ 

## **Step 4:** Internal and external assessment

Summary of assessment results	Breakdown							
	Yes	Need improvement	No	Zero tolerance	Not applicable			
S4 Internal and external assessment								

Note: after completing the self-assessment of "Step 4: Internal and external assessment", the assessor can summarize the results in this table.

5.4.1 Companies should establish internal assessment system, to continuously monitor and manage due diligence performance									
Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation			
5.4.1.1 Develop internal assessment plan, establish internal assessment team and assign a team leader;					• Internal assessment plan	Establish an internal assessment system			
5.4.1.2 Regularly conduct internal assessment, identify issues and risks, to establish improvement plan and monitor its implementation;					• Assessment results and improvement plan	Implement and conduct internal assessment.			
5.4.1.3 Members of internal assessment team should be competence and qualified for supply chain due diligence management.					• Assessor's resume	Internal assessors meet certain qualifications and competence requirements.			

#### 5.4.1 Companies should establish internal assessment system, to continuously monitor and manage due diligence performance

 $\c The assessor fills in the assessment description for this requirement here \c I$ 

5.4.2 Companies should designate the second- or third-party to conduct assessment when applicable.									
Term	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation			
5.4.2.1 Assign independent assessment institute and assessor with high reputation to conduct assessment;					• External Assessment Power of Attorney/Contract	Conduct external assessment.			
5.4.2.2 Conduct annual assessment, the scope of assessment includes a reporting period of 12 months;					• Assessment plan/report	The period of external assessment shall not exceed 12 months at most and not less than 3 months at least.			
5.4.2.3 Documents should be fully prepared for assessor's review, including system documents, on-the-ground assessment reports, records of stakeholders consultation, supplier assessment reports, etc.;					• Assessment report	Facilitate external assessment.			
5.4.2.4 Allow assessor to access to facilities or sites within the scope of assessment for in-site investigation, document review and interview;					• Assessment report	Facilitate external assessment.			
5.4.2.5 Under specific circumstance, if the company sources materials from conflict-affected and high-risk areas, the company should facilitate contact with suppliers selected by the assessment team;					• Communication record	Facilitate external assessment, especially providing supplier samples and helping assessor communicate/interview with suppliers.			
5.4.2.6 Explore fair and feasible cost-sharing plans with upstream and downstream companies					• Communication record	Communicate with upstream and downstream companies on			

for assessment. These plans include, when			assessment plans and costs.
possible, providing capacity building for			
companies to be assessed, to achieve expected			
requirements, and commit purchase, to ensure			
fair payment.			

#### 5.4.2 Companies should designate the second- or third-party to conduct assessment when applicable.

[The assessor fills in the assessment description for this requirement here]

### 5.4.3 When necessary, the company at the key points(smelters/refiners) makes necessary disclosures on the assessment results.

Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
5.4.3.1 Publish assessment report or summary with due regard to business confidentiality and competitive concerns;					• Public accessible web links	The refinery/smelter publishes the assessment report or summary when appropriate.
5.4.3.2 Release the name of assessment institute and assessors.					• Public accessible web links	The public assessment report or summary includes information on the assessment agency and assessors.

5.4.3 When necessary, the company at the key points(smelters/refiners) makes necessary disclosures on the assessment results.

[The assessor fills in the assessment description for this requirement here]

#### 5.4.4 Companies should develop corrective action plan in accordance with the assessment results.

Indicator	Yes	Need improve ment	No	N/A	Assessor's summary description of the indicator	
5.4.4.1 Determine whether an improvement plan is needed based on the assessment results. If necessary, the improvement plan should include:					The assessor's assessment conclusion on the performance of the enterprise in this indicator:	
Element	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
a. A description of the issues identified in the assessment;					• Corrective plan	The corrective plan includes a description of the problem.
b. In accordance with suggestions that can be referred to in the annex of this Guideline;					• Corrective plan	The corrective plan includes risk mitigation strategy and suggestions in accordance with the he model policies in Appendix I of the Chinese Guidelines.

c. The type and level of risk identified;			• Corrective plan	The corrective plan includes risk rating results.
d. Root Cause Analysis;			• Corrective plan	The corrective plan includes an analysis of the root cause
e. Specific measures for improvement actions			• Corrective plan	The corrective plan includes specific measures.
f. The timeframe for implementing the improvement plan;			• Corrective plan	The corrective plan includes the timeframe.
g. The department or person in charge of implementing the improvement plan.			• Corrective plan	The corrective plan includes the department or person in charge.

#### **5.4.4** Companies should develop action corrective plan in accordance with the assessment results

**(***The assessor fills in the assessment description for this requirement here* **)** 

# **Step 5:** Reporting and communication

Summary of assessment results	Breakdown							
	Yes         Need improvement         No         Zero tolerance         Not application							
S5 Reporting and communication								

Note: After completing the assessment of "Step 5: Reporting and communication", the assessor can summarize the assessment results in this table.

5.5.1 Develop due diligence progress report									
Indicator	Yes	Need improve ment	No	N/A	Assessor's summary description of the indicator				
5. 5. 1. 1 Determine the scope of due diligence progress report, the content should cover the following elements:					The assessor's assessment conclusion on the performance of the enterprise in this indicator:				
Element	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation			
a. Due diligence policy;					<ul> <li>Progress report</li> <li>Policy</li> </ul>	The due diligence progress report needs to reflect the due diligence policies or commitments formulated by the company.			
b. Management structure for the company's due diligence;					<ul> <li>Progress report</li> <li>Committee structure</li> </ul>	The report needs to reflect the corporate management structure and the management of related due diligence efforts, such as committee structures.			
c. Description of control and transparency system;					<ul> <li>Progress report</li> <li>Control and transparency system</li> </ul>	The report needs to reflect the description of the company's control and transparency system to			

				disclose and demonstrate the
				management of the company's
				supply chain traceability.
				The report needs to reflect the
d. Supplier cooperation methods and			Progress report	cooperation and communication
content			• Records of cooperation	content between the company and
				the supplier.
			• Progress report	The report needs to reflect the
e. Grievance mechanism, procedures and			<ul> <li>Grievance mechanism</li> </ul>	company's grievance mechanism.
dealing status of received complaints;			• Grievance mechanism	
			• Progress report	The report needs to reflect the
f. Procedure or method to identify			<ul> <li>Procedures for identification of</li> </ul>	procedures and results of the
Conflict-Affected and High-Risk areas			CAHRAs	company's identification of
(CAHRAs);			CAIIKAS	CAHRAs.
				The company's assessments/audit
g. The company's assessment report or			Progress report	reports or summary (especially the
summary;			• Assessment report / summary	crude and fine refiners) conducted
				by the third-party
h. Ways or methods of report disclosure.			• Progress report	Public link or other means

Indicator	Yes	Need improve ment	No	N/A	Assessor's summary description of the indicator	
5. 5. 1. 2 For companies who triggered the red flags, the report should also include the following elements:					The assessor's assessment conclusion on the performance of the enterprise in this indicator:	
Element	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
i. Information of chain of custody or traceability of the supply chain;					• Progress report	The report needs to reflect the traceability information of the company's supply chain.
j. Information on the origin of raw materials;					• Progress report	The report needs to reflect the origin information of the company's raw materials.
k. Methods and results of risk identification and assessment;					<ul> <li>Progress report</li> <li>Result of risk identification</li> </ul>	The report needs to reflect the methods and results of risk identification.
I. Method, process and results of on-the-ground assessment;					<ul> <li>Progress report</li> <li>Report of on-the-ground asessment</li> </ul>	The report needs to reflect the company's on-the-ground assessment methods and results.
m. The measures and strategies adopted in					<ul><li> Progress report</li><li> Risk management plan</li></ul>	The report needs to reflect the company's risk management plan.

the risk management plan, the participation of affected stakeholders, etc.;				
n. Risk monitoring and performance tracking results;			<ul> <li>Progress report</li> <li>Risk management plan</li> </ul>	The report needs to reflect the process and results of risk monitoring and performance tracking.
o. Suggestions of reporting may be provided on extractive industry transparency or information disclosure in some countries.			• Progress report	The report needs to reflect the company's response to transparency requirements.

## 5.5.1 Develop due diligence progress report

 $\c The assessor fills in the assessment description for this requirement here \c The assessment description for the transmission of transmission of the transmission of transmission of the transmission of transmis$ 

5.5.2 With due regard to business confidentiality and other competitive concerns, companies should publish due diligence progress reports or summary.

Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
5.5.2.1 Publish on its own or through industry platforms;					• Public link	Companies need to publish the due diligence progress report or summary to increase transparency.
5.5.2.2 The due diligence information can also be incorporated in its sustainability report, corporate social responsibility report, supply chain management progress report or annual report for disclosure.					• Corporate social responsibility (CSR) report, etc.	Companies can voluntarily choose to include the progress of due diligence in other reports such as corporate social responsibility reports.
5.5.2.3 Compile and disclose the report on an annual basis					• The report containing the formulation cycle	Formulate the report on a regular basis.

5.5.2 With due regard to business confidentiality and other competitive concerns, companies should publish due diligence

#### progress reports or summary.

*[The assessor fills in the assessment description for this requirement here ]* 

Requirement	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
5.5.3 During the preparation and release of the report, the company can consider publishing the report in local languages, to communicate with actual or potential affected stakeholders in a timely and accessible way, and with local cultural perspective.					• Reports in local language	Companies can translate the report into the local language and regard the report as a medium of effective communication.
<ul> <li>5.5.4 In addition to reporting due diligence progress, companies can also consider other communication methods, such as:</li> <li>a. Face-to-face meeting;</li> <li>b. Online dialogue;</li> <li>c. Seek comments from actual and potential affected parties;</li> <li>d. Share assessment process or assessment results with workers' union.</li> </ul>					<ul> <li>Meeting minutes</li> <li>Communication record</li> <li>Consultation record</li> </ul>	Holding meetings is an effective way of communication. Online meetings can complement the communication effectiveness. Consult as many affected stakeholders as possible. Consult the company's labor unions and local labor unions as much as possible. Identify local medias for communication, such as local

e. Other appropriate media.			media, internet platforms, etc.

#### 5.5.3-5.5.4

The assessor fills in the assessment description for the requirements 5.5.3 to 5.5.5

## **Step 6:** Provide for or cooperate in remediation when appropriate

Summary of assessment results	Breakdown						
	Yes	Need improvement	No	Zero tolerance	Not applicable		
S6 Provide for or cooperate in remediation when appropriate							

Note: After completing the assessment of "Step 6: provide for or cooperate in remediation when appropriate", the assessor can summarize the results.

5.6.1 When the company recognize that it has caused or contributed to actual adverse impacts, they should mitigate these impacts by providing for or cooperating in remediation when appropriate.

Indicator	Yes	Need improve ment	No	N/A	Assessor's summary dea	scription of the indicator
<ul> <li>5. 6. 1. 1 The company has a process or procedure to identify the relationship between the company and the adverse impact.</li> <li>Comply with laws and regulations, and seek out national or international guidance on remediation (if available); where such guidance is not available, consider to take remediation measures that are consistent with that provided in similar cases.</li> <li>The type of remediation or combination of remediation measures depend on the nature and extent of the adverse impacts, and may include:</li> </ul>					The assessor's assessment conc the enterprise in this indicator:	lusion on the performance of
Element [When the company contributes or promotes adverse impacts, the following elements should be assessed, otherwise select "not applicable (N/A)"]	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
a. Apologies;					• Apology letter	Remedial measures may include formal apology.
<b>b</b> . Restitution or rehabilitation (such as					• <i>Restitution or rehabilitation</i>	Remediation measures may include

reinstatement of a dismissed worker, recognition of the trade union for the purpose of collective bargaining);			measures	restitution or rehabilitation.
c. Financial or non-financial compensation (for example, establishing compensation funds for victims, or for future outreach and education programmes);			• Compensation measures	Remediation measures may include compensation.
d. Punitive sanctions (for example, dismissal of staff responsible for wrongdoing);			• Punitive measures	Remediation measures may include appropriate punitive measures.
e. Take measures to prevent adverse impacts in the future.			• Preventive measures	Remediation measures may include preventive measures.

Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
5.6.1.2 Seek to restore the affected people to the original situation they were in as far as possible, and implement corresponding remedies according to the significance and degree of the adverse impacts;					• Restitution or rehabilitation and compensation measures	Remediation measures may include restitution or rehabilitation, and develop compensation measures.
5.6.1.3 The affected stakeholders or their representatives can be consulted and cooperated					• Consultation record	In the remedial process, the opinions of affected stakeholders or their representatives need to be

to provide remedies;					consulted.
5.6.1.4 Establish a grievance mechanism (refer to 5.1.5 for details), and seek to the satisfaction of impacted personnel about the remedy process and results.				• Grievance record	The grievance mechanism is also an effective information source to provide remediation measures.
Assessor's assessment conclusions for indicators 5	5.6.1.2 to \$	5.6.1.4:			

#### 5.6.1 When the company recognize that it has caused or contributed to actual adverse impacts, they should mitigate these

#### impacts by providing for or cooperating in remediation when appropriate.

[The assessor fills in the assessment description for this requirement here]

5.6.2 Companies provide conditions or cooperate with existing remedial mechanisms in a timely manner						
Indicator	Yes	Need improve ment	No	N/A	Description of supporting document/evidence	Explanation
5.6.2.1 Cooperate with judicial or non-judicial mechanisms. For example, the country's judicial mechanism, the National Contact Point of OECD, or other industry initiatives on grievance mechanisms.					• Application or remediation records	Existing mechanisms can be used to determine remediation measures, such as litigation and other judicial mechanisms, arbitration, or grievance mechanisms provided by some international agencies and industry organizations.

## 5.6.2 Companies provide conditions or cooperate with existing remedial mechanisms in a timely manner

[The assessor fills in the assessment description for this requirement here ]

#### 6. List of evidences for assessment

Note: After obtaining the company's permission or consent, the assessor can attach the following evidence to the back of this report, or form an individual file.

No.	Tile	No.	Tile
1	The company's responsible sourcing policy	13	Training plan
2	Administration Committee/Working Group Management	14	Training record
	Measures		
3	Supplier Code of Conduct (if applicable)	15	Procedures and checklist for identifying conflict-affected and
			high-risk areas
4	Supply Chain Traceability Form	16	Warning signal review checklist
5	Material balance sheet	17	Risk Identification Form
6	Suppliers list	18	Risk prevention and mitigation plan
7	Terms of Responsible Sourcing Contract	19	Corrective Action Plan (CAP)
8	Certificate of Origin/Customs Declaration (Customs	20	Internal Assessment Report/Summary
	Clearance) Form		
9	List of outsourced processes and outsourced factories (if	21	Internal Assessment Workplan
	applicable)		
10	List of stakeholders	22	Third party assessment/audit report or summary (if applicable)
11	Stakeholder consultation record (if applicable)	23	Progress report or summary
12	Grievance mechanism	24	Remediation plan (if applicable)

#### 7. On-site photoes

Note: After obtaining the company's permission or consent, the assessor can take photos of the company's gate, on-site raw material storage, production process/procedure, product storage site, etc., and attach it to this report (if the company refuses, the assessor can make a note).