



RESPONSIBLE MINERALS ASSURANCE PROCESS ASSESSMENT REPORT

The flagship program of the RMI, the Responsible Minerals Assurance Process (RMAP), formerly the Conflict-Free Site Program (CFSP), takes a unique approach to helping companies make informed choices about responsibly sourced minerals in their supply chains. Focusing on a “pinch point” (a point with relatively few actors) in the global metals supply chain, the RMAP uses an independent third-party audit of site/refiner management systems and sourcing practices to validate conformance with RMAP protocols and current global standards. The audit employs a risk-based approach to validate sites' company level management processes for responsible mineral procurement. Companies can then use this information to inform their sourcing choices. For more information, please visit: www.responsiblemineralsinitiative.org.

Auditee Name	Niihama Nickel Refinery, Sumitomo Metal Mining Co., Ltd.
CID Number	CID003278
Facility Address	5-1, Nishibara-cho 3-chome Niihama, Ehime NA Japan
Assessment Date(s)	03/31/2021 - 03/31/2021
Assessment Type	Initial Audit
Assessed Material	Cobalt
Sourcing from High-Risk Supply Chains	No
Assessment Cycle	1 year

I.ASSESSMENT SCOPE

Assessment Period	01/01/2020 - 12/31/2020
Assessment Company	Intertek

II.ASSESSMENT OBJECTIVES

The objective of the assessment is to assess the auditee's level of conformance with the Responsible Minerals Assurance Process Cobalt Standard of 2018.

III.ASSESSMENT METHODOLOGY

The assessment consisted of collecting and reviewing objective evidence including documentation, management and employee interviews, facility walk-through, and other observations demonstrating that the site/refiner's due diligence management system conforms, in all material aspects, to the requirements of the applicable Standard.



IV.CONCLUSION

Assessment Results:	
<input checked="" type="checkbox"/>	The assessment was conducted in accordance with ISO19001:2011 Standard, taking into account the guidance provided by the Responsible Minerals Assurance Process. The auditor verified the scope, selected samples, and gathered objective evidence through documentation review, interviews, and visual observations.
<input checked="" type="checkbox"/>	The auditor found that the auditee's due diligence system are in conformance, in all material aspects, with the requirements of the Responsible Minerals Assurance Process Tin and Tantalum / Tungsten / Gold Standard of 2017 or Cobalt Standard of 2018 and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
<input type="checkbox"/>	The auditor identified material non-conformance(s) between the auditee's systems, processes and practices and the requirements of the Responsible Minerals Assurance Process Tin and Tantalum / Tungsten / Gold Standard of 2017 or Cobalt Standard of 2018 and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Material non-conformance(s) relate to:
Auditor Statements:	
<input checked="" type="checkbox"/>	The information provided by the auditee is true and accurate to the best knowledge of the Auditor(s) preparing the report.
<input checked="" type="checkbox"/>	The findings are based on verified objective evidence relevant to the time period for the assessment.
<input checked="" type="checkbox"/>	The Auditor(s) have acted in a manner deemed ethical, truthful, accurate, professional, independent and objective.
<input checked="" type="checkbox"/>	The Auditor(s) are properly qualified to carry out the assessment.
<input checked="" type="checkbox"/>	There were no limitations to this audit.



RMI STATEMENT ON COBALT REFINER CONFORMANCE STATUS, LIMITATIONS AND EXPLANATION OF FINDING TYPES

Formalized due diligence in the cobalt supply chain is a recent development, and implementation of certain due diligence processes requires cooperation among many supply chain partners. The Responsible Minerals Initiative (RMI) recognizes that while an increasing number of cobalt refiners are working toward implementing OECD-aligned due diligence and material origin transparency globally, there is an inherent complexity that affects their efforts to address systemic challenges in specific geographies and contexts that may not be entirely in their control, which will take time and collaboration from various government and private sector actors to address.

The RMI is supporting Responsible Minerals Assurance Process (RMAP)-participating cobalt refiners, and other key partners and stakeholders, in working to address these systemic challenges. The RMI's program is based on a continuous improvement model, whereby we acknowledge due diligence is a dynamic process and companies are expected to progressively improve their due diligence practices and risk management performance over time, including through constructive engagement with suppliers.

Conformance to the Cobalt Refiner Due Diligence Standard indicates that critical findings have been sufficiently addressed for an initial RMAP assessment, and there were no zero-tolerance findings identified during the course of the assessment. This means that fundamental due diligence management system processes have been established, and the refiner has a plan (with responsible parties and timelines) to close all remaining gaps in origin documentation and enhanced due diligence activities. This does not necessarily mean that there were no findings. All findings are required to be addressed in the succeeding assessments.

For more information about the current standard requirements, including finding types, please see the Cobalt Refiner Due Diligence Standard and RMAP Procedure [here on the RMI website](#) .