

**REVISION HISTORY**

A change in the first digit of the revision number (e.g., 1.0 to 2.0) signifies a set of major improvements have occurred which will likely include different data reporting requirements. Changes to the first or second decimal place (e.g., "2.05" to "2.02") indicate only minor changes have been made to the template which are not expected to result in substantial changes to the data being reported. The addition of a letter (e.g., "a", "b", or "c") following the revision number indicate that only the standard error

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

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**Introduction**

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

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

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

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\* In 2010, the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act was passed concerning "conflict minerals" originating from the Democratic Republic of the Congo (DRC) or adjoining countries. The SEC published final rules associated with the disclosure of the source of conflict minerals by U.S. publicly traded companies (see the rules at <http://www.sec.gov/rules/final/2012/34-67716.pdf>). The rules reference the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. (<http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf>), which guides suppliers to establish policies, due diligence frameworks and management systems.

In 2017, Regulation (EU) 2017/821 of the European Parliament and of the European Council of 17 May 2017 was passed concerning supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas (see regulation at <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L:2017:130:FULL&from=EN>)

\*\* See information on the Responsible Minerals Initiative ([www.responsiblemineralsinitiative.org](http://www.responsiblemineralsinitiative.org)).

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

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

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

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

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

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

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

This field is mandatory.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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2. This question shall be answered for each 3TG for each the answer to question 1 is "yes." This is the second of two questions for which the response is used to determine whether the 3TG is within the scope of conflict minerals reporting requirements as described in the SECs final rules regarding the determination if a 3TG is necessary to the functionality or production of a product. This question is dependent upon the question and response to Question 1. This question is intended to identify 3TGs which are intentionally added or included in the manufacturing process of a product where some amount of the 3TG remains in the finished product. This includes 3TGs which may not have been intended to become part of the final product and may not be necessary to the functionality of the product but are only present as residuals of the manufacturing process. In many cases, the manufacturer may have attempted to remove or facilitate consumption of the 3TG during the manufacturing process, however, some amount of the 3TG remains. Should the 3TG, which is added or included during the manufacturing process, be completely removed such that none of the 3TG remains upon the completion of that process, the response to this question would be no.

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

<p>3. This is a declaration that any portion of the 3TGs contained in a product or multiple products originates from the DRC or an adjoining country (covered countries). The answer to this question should be "yes" if any smelter in the supply chain sources from the covered countries, even if those smelters are on the RMI conformant smelter and refiner list. For more information, see RMI's due diligence guidance on conflict minerals here: <a href="http://www.responsiblemineralsinitiative.org/training-and-resources/publications-and-guidance/">http://www.responsiblemineralsinitiative.org/training-and-resources/publications-and-guidance/</a>.</p> <p>The answer to this question shall be "yes", "no", or "unknown". It is recommended to substantiate a "Yes" answer in the comments section.</p> <p>This question is mandatory for a specific metal if the response to Question 1 and 2 is "Yes" for that metal.</p>
<p>4. This is a declaration that any portion of the 3TGs contained in a product or multiple products originates from conflict-affected and high-risk areas (CAHRAs).</p> <p>The answer to this question should be "yes" if any smelter in the supply chain sources from covered countries or CAHRAs, even if those smelters are on the RMI conformant smelter and refiner list. For more information, see RMI's due diligence guidance on conflict minerals here: <a href="http://www.responsiblemineralsinitiative.org/training-and-resources/publications-and-guidance/">http://www.responsiblemineralsinitiative.org/training-and-resources/publications-and-guidance/</a>.</p> <p>The answer to this question shall be yes, no or unknown. It is recommended to substantiate a "yes" answer in the comments section. This question is mandatory for a specific metal if the response to Question 1 and 2 is "yes" for that metal.</p>
<p>5. This is a declaration that identifies whether 3TGs contained in the product(s) necessary to the functionality of that product(s) originate from recycled or scrap sources.</p> <p>The answer to this question shall be "yes", "no", or "unknown". This question is mandatory for a specific metal if the response to Question 1 and 2 is "Yes" for that metal.</p> <p>A "Yes" answer means that 100% of the 3TG comes from recycled or scrap sources. A "No" answer means that some of the 3TG does not come from recycled or scrap sources. An "Unknown" answer means that the user does not know whether or not 100% of the 3TG comes from recycled or scrap sources.</p>
<p>6. This is a question to determine whether a company has received conflict minerals disclosures from all direct suppliers reasonably believed to be providing 3TGs contained in the products covered by the scope of this declaration. Permissible responses to this question are:</p> <ul style="list-style-type: none"> <li>- 100%</li> <li>- Greater than 90%</li> <li>- Greater than 75%</li> <li>- Greater than 50%</li> <li>- 50% or less</li> <li>- None</li> </ul> <p>This question is mandatory for a specific metal if the response to Question 1 and 2 is "Yes" for that metal.</p>
<p>7. This question verifies if the supplier has reason to believe they have identified all of the smelters providing 3TGs in the products covered by this declaration. The answer to this question shall be "Yes" or "No", along with a comment in certain cases, e.g. list of smelters.</p> <p>This question is mandatory for a specific metal if the response to Question 1 and 2 is "Yes" for that metal.</p>
<p>8. This question verifies that all of the smelters identified to be providing any of the 3TGs contained in the products covered by the scope of this declaration have been reported in this declaration. The answer to this question shall be "yes" or "no" along with a comment in certain cases, e.g. list of smelters. This question is mandatory for a specific metal if the response to Question 1 and 2 is "Yes" for that metal.</p> <p>Provide comments in the Comment sections as required to clarify your responses.</p>
<p><b>Instructions for completing Questions A – H. (rows 75 - 89). Questions A. through H. are mandatory if the both of responses to Question 1 and 2 are "Yes" for any metal.</b></p> <p><b>Provide answers in ENGLISH only.</b></p>
<p>The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-affected and High-risk Areas (OECD Guidance) defines "Due Diligence" as "an on-going, proactive and reactive process through which companies can ensure that they respect human rights and do not contribute to conflict". Due diligence should be an integral part of your company's overall conflict free sourcing strategy. Questions A. thru H. are designed to assess your company's conflict-free minerals sourcing due diligence activities. Responses to these questions shall represent the full scope of your company's activities and shall not be limited to the 'Declaration Scope' selected in the company information section.</p>
<p>A. This is a declaration to disclose whether a company has a responsible minerals sourcing policy. The answer to this question shall be "yes" or "no." Comments shall be captured in a question comment field.</p> <p>This question is mandatory.</p>
<p>B. This is a declaration to disclose whether a company's responsible minerals sourcing policy is available on the company website. The answer to this question shall be "yes" or "no." If "Yes" the user shall specify the URL in a question comment field.</p> <p>This question is mandatory.</p>
<p>C. This is a declaration to determine whether a company requires their direct suppliers to source 3TG from validated smelters. The answer to this question shall be "yes" or "no." Comments should be captured in a question comment field.</p> <p>This question is mandatory.</p>
<p>D. Please answer "yes" or "no" to disclose whether your company has implemented responsible sourcing due diligence measures. This declaration is not intended to provide the details of a company's due diligence measures - just that a company has implemented due diligence measures. The aspects of acceptable due diligence measures shall be determined by the requestor and supplier.</p> <p>Examples of due diligence measures may include: communicating and incorporating into contracts (where possible) your expectations to suppliers on responsible mineral supply chain; identifying and assessing risks in the supply chain; designing and implementing a strategy to respond to identified risks; verifying your direct supplier's compliance to its responsible minerals sourcing policy, etc. These due diligence measure examples are consistent with the guidelines included in the internationally recognized OECD Guidance.</p> <p>This question is mandatory.</p>
<p>E. This is a question to disclose whether a company requests their supplier to fill out a conflict minerals declaration. Acceptable answers are listed below, in certain cases further explanation may be required, i.e., to provide the format used for collecting information. If the answer is "Yes," using other format the user shall provide a comment in a question comment field. Permissible responses to this question are:</p> <ul style="list-style-type: none"> <li>- Yes, in conformance with IPC-1755 [e.g., CMRT]</li> <li>- Yes, using other format (describe)</li> <li>- No</li> </ul> <p>This question is mandatory.</p>
<p>F. Please answer "Yes" or "No". In the comments section, you can provide additional information on your approach. Examples could be:</p> <ul style="list-style-type: none"> <li>"3rd party audit" - on-site audits of your suppliers conducted by independent third parties.</li> <li>"Documentation review only" - a review of supplier submitted records and documentation conducted by independent third parties and, or your company personnel.</li> <li>"Internal audit" - on-site audits of your suppliers conducted by your company personnel.</li> </ul> <p>This question is mandatory.</p>
<p>G. This is a question to disclose whether a company's review process includes corrective action management. The answer to this question shall be "yes" or "no." Comments shall be captured in a question comment field.</p> <p>This question is mandatory.</p>
<p>H. This is a question to disclose whether a company is subject to the SEC rule, the EU regulation, or both. The answer to this question shall be "yes, with the SEC", "yes, with the EU", "yes with the SEC and the EU" or "no." Comments shall be captured in a question comment field. This question is mandatory. For more information on the SEC rule, please refer to <a href="http://www.sec.gov">www.sec.gov</a>. For more information on the EU regulation, please refer to <a href="http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R0821&amp;from=EN">http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R0821&amp;from=EN</a>.</p>
<p><b>Instructions for completing the Smelter List Tab.</b></p> <p><b>Provide answers in ENGLISH only.</b></p> <p><b>Note: Columns with (*) are mandatory fields.</b></p>
<p>This template allows for smelter identification using the Smelter Look-up. Columns B, and C must be completed in order from left to right to utilize the Smelter Look-up feature.</p> <p>Use a separate line for each metal / smelter / country combination.</p>
<p>1. Smelter Identification Input Column - If you know the Smelter Identification Number, input the number in Column A (columns B, C, E, F, G, I, and J will auto-populate). Column A does not autopopulate.</p>

2. Metal (*) - Use the pull down menu to select the metal for which you are entering smelter information. This field is mandatory.
3. Smelter Look-up (*) - Select from dropdown. This is the list of known smelters as of template release date. If smelter is not listed select 'Smelter Not Listed'. This will allow you to enter the name of the smelter in Column D. If you do not know the name or location of the smelter, select 'Smelter Not Yet Identified.' For this option, columns D and E will autopopulate to say, 'unknown.' This field is mandatory.
4. Smelter Name (1)- Fill in smelter name if you selected "Smelter Not Listed" in column C. This field will auto-populate when a smelter name is selected in Column C. This field is mandatory.
5. Smelter Country (*) - This field will auto-populate when a smelter name is selected in column C. If you selected "Smelter Not Listed" in column C, use the pull down menu to select the country location of the smelter. This field is mandatory.
6. Smelter Identification - This is a unique identifier assigned to a smelter or refiner according to an established smelter and refinery identification system. It is expected that multiple names or aliases could be used to describe a single smelter or refiner and therefore multiple names or aliases could be associated to a single 'Smelter ID'.
7. Source of Smelter Identification Number - This is the source of the Smelter Identification Number entered in Column F. If a smelter name was selected in Column C using the dropdown box, this field will auto-populate.
8. Smelter Street - Provide the street name on which the smelter is located. This field is optional.
9. Smelter City - Provide the city name of where the smelter is located. This field is optional.
10. Smelter Location: State/Province, if applicable - Provide the state or province where the smelter is located. This field is optional.
11. Smelter Contact Name - The Conflict Minerals Reporting Template (CMRT) is circulated among companies in the requesting company's supply chain to ensure compliance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the U.S. Securities and Exchange Commission Final Rule on conflict minerals.  If the template is circulated in a country where laws protecting personal information exist, sharing personal contact information in the CMRT may violate related regulations. Therefore, it is recommended that the requesting company take precautions such as obtaining the contact person's permission to share the information with other companies in the supply chain when completing "Smelter Contact Name" and the "Smelter Contact Email" columns.  If you have permission to share this information, please fill in the name of the Smelter Facility Contact person who you worked with.
12. Smelter Contact Email - Fill in the email address of the Smelter Facility contact person who was identified as the Smelter Contact Name. Example: John.Smith@SmelterXXX.com. Please review the instructions for Smelter Contact Name before completing this field.
13. Name of Mine(s) - This field allows a company to define the actual mines being used by the smelter. Please enter the actual mine names if known. If 100% of the smelter's feedstock originates from recycled or scrap sources, enter "Recycled" or "Scrap" in place of the name of the mine and answer "Yes" in Column P.  "RCOI confirmed as per RMI" may be an acceptable answer to this question.
14. Location (Country) of Mine(s) - This is a free form text field that allows a company to define the location of the mines being used by the smelter. Please enter the country of the mine(s). If the country of origin is not known, enter "Unknown". If 100% of the smelter's feedstock originates from recycled or scrap sources, enter "Recycled" or "Scrap" in place of the country of origin. This field is optional.  "RCOI confirmed as per RMI" may be an acceptable answer to this question.
15. Indicates whether the smelter solely obtains inputs for its smelting process(es) from recycled or scrap sources. This question is optional. Permissible responses to this question are:  - Yes - No - Unknown
16. Comments - free form text field to enter any comments concerning the smelter. Example: smelter is being acquired by Company YYY
<b>TERMS AND CONDITIONS</b>
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If any part of any provision of these Terms and Conditions shall be invalid or unenforceable under applicable law, said part shall be deemed ineffective to the extent of such invalidity or unenforceability only, without in any way affecting the remaining parts of said provision or the remaining provisions of these Terms and Conditions.
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<b>ITEM</b>	<b>DEFINITION</b>
3TG	Tantalum, tin, tungsten, gold
Authorizer	This field identifies the person responsible for the content of the declaration. The authorizer may be a different individual from the contact person. It is not correct to use the words "same" or similar identification to provide the name of the authorizer.
Conflict-Affected and High-Risk Areas (CAHRA)	Conflict-affected and high-risk areas are areas in a state of armed conflict, fragile post-conflict areas, as well as areas of pressing weak or non-existing governance and security, such as failed states, and widespread and systematic violations of international law, including human rights abuses.
Conflict Mineral	As defined in 2010 United States legislation, Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502(a)(4): <b>CONFLICT MINERAL.</b> —The term "conflict mineral" means— (A) columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives; or (B) any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country. (available at <a href="http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf">http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf</a> )
Covered Country(ies)	Covered Country(ies) as defined by the United States Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. These countries include the Democratic Republic of the Congo and the nine countries with which it shares an internationally recognized border: Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, Zambia.
Declaration Scope or Class	For the purposes of this template, "scope" describes the applicability of the information provided by the reporting company. The scope may encompass the entirety of a company's services and/or products, or at a company's discretion, the template may be used to report on a specific product (or products) or, be "User defined". The "User defined" scope selection or class may be used to describe any subset of a company's operation or product portfolio.
Dodd-Frank	2010 United States legislation, Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502 ("Dodd-Frank") ( <a href="http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf">http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf</a> )
DRC	Democratic Republic of Congo
Gold (Au) refiner (smelter)	A gold refiner is a metallurgical operation that produces fine gold with a concentration of 99.5% or higher from gold and gold-bearing materials with lower concentrations. Refer to the RMAP audit protocol for this metal for a complete description: <a href="http://www.responsiblemineralsinitiative.org/smelter-introduction/">http://www.responsiblemineralsinitiative.org/smelter-introduction/</a>
Independent Third-Party Audit Firm	With respect to smelter audits, an "Independent Third-Party Audit Firm" is a private sector organization competent in evaluating the smelter or refiner's materials traceability against the standards of the RMAP or equivalent audit protocols. To maintain neutrality and impartiality, such organization and its audit team members must have no conflicts of interest with the auditee.
Intentionally added	Intentionally added is commonly known as the deliberate use of a substance, or in this case metal, in the formulation of a product where continued presence is desired to provide a specific characteristic, appearance or quality.  While the SEC does not define the phrase "intentionally added" in the final rule*, the rule's preamble states: "We agree that being intentionally added, rather than being a naturally-occurring by-product, is a significant factor in determining whether a conflict mineral is "necessary to the functionality or production" of a product. This is true regardless of who intentionally added the conflict mineral to the product so long as it is contained in the product. [D]etermining whether a conflict mineral is considered "necessary" to a product should not depend on whether the conflict mineral is added directly to the product by the issuer or whether it is added to a component of the product that the issuer receives from a third party. Instead, the issuer should report on the totality of the product and work with suppliers to comply with the requirements." Therefore, in determining whether a conflict mineral is "necessary" to a product, an issuer must consider any conflict mineral contained in its product, even if that conflict mineral is only in the product because it was included as part of a component of the product that was manufactured originally by a third party." *(56296 Federal Register / Vol. 77, No. 177 / Wednesday, September 12, 2012 / Rules and Regulations)
IPC	IPC ( <a href="http://www.ipc.org">www.ipc.org</a> ) is a global industry association based in Bannockburn, Ill., dedicated to the competitive excellence and financial success of its 3,400 member companies which represent all facets of the electronics industry, including design, printed board manufacturing, electronics assembly and test. As a member-driven organization and leading source for industry standards, training, market research and public policy advocacy, IPC supports programs to meet the needs of an estimated \$2.0 trillion global electronics industry. IPC maintains additional offices in Taos, N.M.; Washington, D.C.; Stockholm, Sweden; Moscow, Russia; Bangalore, India; Bangkok, Thailand; and Shanghai, Shenzhen, Chengdu, Suzhou and Beijing, China
IPC-1755 Responsible Sourcing of Minerals Data Exchange Standard	This IPC standard establishes the requirements for exchanging conflict minerals data between suppliers and their customers. To meet the needs of a broad range of users, this standard provides flexibility in the scope of the products covered within a single declaration. This standard is not a compliance guide.
Necessary for the Functionality of a Product	The SEC does not provide a formal definition of this phrase in the final rule*, however it provides some guidance: A conflict mineral will be considered to be necessary to its functionality of a product if it meets the following: 1) is intentionally added to the product or any component of the product and is not a naturally-occurring byproduct; 2) is necessary to the product's generally expected function, use or purpose; and 3) is incorporated for the purpose of ornamentation, decoration, or embellishment, whether the primary purpose of the product is ornamentation or decoration.  NOTE: The conflict mineral must be contained in the product to be applicable. *(56296 Federal Register / Vol. 77, No. 177 / Wednesday, September 12, 2012 / Rules and Regulations)
Necessary for the Production of a Product	The SEC does not provide a formal definition of this phrase in the final rule*, however, it provides some guidance: A conflict mineral will be considered to be necessary to the production of a product when: 1) is intentionally included in the product's production process, other than if it is included in a tool, machine, or equipment used to produce the product (such as computers or power lines); 2) it is included in the product (MUST be contained in the product to be applicable); and 3) it is necessary to the product. *(56296 Federal Register / Vol. 77, No. 177 / Wednesday, September 12, 2012 / Rules and Regulations)
OECD	Organisation for Economic Co-operation and Development
Product	A company's Product or Finished good is a material or item which has completed the final stage of manufacturing and/or processing and is available for distribution or sale to customers.
RBA	Responsible Business Alliance ( <a href="http://www.responsiblebusiness.org">www.responsiblebusiness.org</a> )
Recycled or Scrap Sources	Recycled or scrap sources are recycled metals, that are reclaimed end-user or post-consumer products, or scrap processed metals created during product manufacturing. Recycled metal includes excess, obsolete, defective, and scrap metal materials that contain refined or processed metals that are appropriate to recycle in the production of tin, tantalum, tungsten and/or gold. Minerals partially processed, unprocessed or byproducts from other ores are not included in the definition of recycled metal.
Responsible Minerals Assurance Process (RMAP)	The Responsible Minerals Assurance Process (RMAP) is a process developed by the RBA to enhance company capability to verify the responsible sourcing of metals. Further details of the RMAP can be found here: <a href="http://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/">http://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/</a>
Responsible Minerals Initiative	Founded in 2008 by members of the Responsible Business Alliance, the Responsible Minerals Initiative has grown into one of the most utilized and respected resources for companies addressing conflict minerals issues in their supply chains. Over 360 companies from ten different industries participate in the RMI today, contributing to a range of tools and resources including the Responsible Minerals Assurance Process, the Conflict Minerals Reporting Template, Responsible Country of Origin Inquiry data and a range of guidance documents on conflict minerals sourcing. The RMI also runs regular workshops on conflict minerals issues and contributes to policy development and debates with leading civil society organizations and governments. Additional information is available at <a href="http://www.responsiblemineralsinitiative.org">http://www.responsiblemineralsinitiative.org</a> .
RMAP Conformant Smelter List	The Responsible Minerals Assurance Process (RMAP) Conformant Smelter List is a published list of smelters and refiners that have undergone assessment through the RMAP, a program of the Responsible Minerals Initiative (RMI) or industry equivalent program (such as Responsible Jewellery Council or London Bullion Market Association) and have been validated to be in conformance with the protocols. If a smelter or refiner is not on the list, it has either not completed a RMAP assessment or is not in conformance with the RMAP protocol.  A list of smelters and refiners which have been validated to be conformant to the RMAP can be found at <a href="http://www.responsiblemineralsinitiative.org">www.responsiblemineralsinitiative.org</a> .
SEC	U.S. Securities and Exchange Commission ( <a href="http://www.sec.gov">www.sec.gov</a> )
Smelter	A smelter or refiner is a company that procures and processes mineral ore, slag and/or materials from recycled or scrap sources into refined metal or metal containing intermediate products. The output can be pure (99.5% or greater) metals, powders, ingots, bars, grains, oxides or salts. The terms "smelter" and "refiner" are used interchangeably throughout various publications.
Smelter Identification Number	A unique identification number the RMI assigns to companies that have been reported by members of the supply chain as smelters or refiners, whether or not they have been verified to meet the characteristics of smelters or refiners as defined in the RMAP audit protocols.
Tantalum (Ta) smelter	A tantalum smelter (also known as a processor) is defined as a company that converts Ta-containing ores, co, concentrates, slags or secondary materials into tantalum intermediate products or other tantalum containing products for direct sales or further processing into Ta-containing products, such as Ta powders, Ta components, Ta oxides, alloys, wires, sintered bars, etc. Refer to the RMAP audit protocol for this metal for a complete description at: <a href="http://www.responsiblemineralsinitiative.org/smelter-introduction/">http://www.responsiblemineralsinitiative.org/smelter-introduction/</a>
Tin (Sn) smelter	Primary [tin] smelters are companies with one or more facilities treating tin containing ore concentrates in order to produce tin metal. Secondary [tin] smelters are companies with one or more facilities that treat secondary materials by reduction for the production of crude or higher grade tin or tin product such as solder. A smelter as referred to within this audit protocol may operate as either one or both types of business operation. Refer to the RMAP audit protocol for this metal for a complete description: <a href="http://www.responsiblemineralsinitiative.org/smelter-introduction/">http://www.responsiblemineralsinitiative.org/smelter-introduction/</a> .
Tungsten (W) smelter	A company with one or more facilities that converts W-containing ores (such as wolframite and scheelite), W concentrates, or W-bearing scrap (secondary material) into tungsten containing intermediates such as Ammonium Para-Tungstate (APT), Ammonium Meta-Tungstate (AMT), ferrotungsten, and tungsten oxides for direct sales or further processed into W-containing products (such as W powder or W-carbide powder). Refer to the RMAP audit protocol for this metal for a complete description: <a href="http://www.responsiblemineralsinitiative.org/smelter-introduction/">http://www.responsiblemineralsinitiative.org/smelter-introduction/</a> .



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## Conflict Minerals Reporting Template (CMRT)

English

Revision 6.31  
May 26, 2023

The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products

[Link to Terms & Conditions](#)

Mandatory fields are noted with an asterisk (\*). Consult the instructions tab for guidance on how to answer each question.

### Company Information

Company Name (*):	United Performance Metals
Declaration Scope or Class (*):	B. Product (or List of Products)
Go to Product List tab to enter products this declaration applies to	
	<a href="#">Click here to enter the products this declaration applies to</a>
Company Unique ID:	
Company Unique ID Authority:	
Address:	Corporate - 3475 Symmes Rd. Hamilton OH 45015
Contact Name (*):	Josh Fields
Email - Contact (*):	jfields@upmet.com
Phone - Contact (*):	513-870-6500
Authorizer (*):	Michael McCord
Title - Authorizer:	Compliance
Email - Authorizer (*):	mmccord@upmet.com
Phone - Authorizer:	513-860-6500
Effective Date (*):	6-Jun-2023

Answer the following questions 1 - 8 based on the declaration scope indicated above

1) Is any 3TG intentionally added or used in the product(s) or in the production process? (*)	Answer	Comments
Tantalum (*)	Yes	
Tin (*)	Yes	
Gold	No	
Tungsten (*)	Yes	

2) Does any 3TG remain in the product(s)? (*)	Answer	Comments
Tantalum (*)	Yes	
Tin (*)	Yes	
Gold		
Tungsten (*)	Yes	

3) Do any of the smelters in your supply chain source the 3TG from the covered countries (SEC term, see definitions tab) (*)	Answer	Comments
Tantalum (*)	No	
Tin (*)	No	
Gold		
Tungsten (*)	No	

4) Do any of the smelters in your supply chain source the 3TG from conflict-affected and high-risk areas? (*)	Answer	Comments
Tantalum (*)	No	
Tin (*)	No	
Gold		
Tungsten (*)	No	

5) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources? (*)	Answer	Comments
Tantalum (*)	No	primary source is recycled or scrap
Tin (*)	No	primary source is recycled or scrap
Gold		
Tungsten (*)	No	primary source is recycled or scrap

6) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)	Answer	Comments
Tantalum (*)	100%	
Tin (*)	100%	
Gold		
Tungsten (*)	100%	



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## Conflict Minerals Reporting Template (CMRT)

English

Revision 6.31  
May 26, 2023

The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products

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Mandatory fields are noted with an asterisk (\*). Consult the instructions tab for guidance on how to answer each question.

7) Have you identified all of the smelters supplying the 3TG to your supply chain? (\*)

	Answer	Comments
Tantalum (*)	Yes	
Tin (*)	Yes	
Gold		
Tungsten (*)	Yes	



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English

## Conflict Minerals Reporting Template (CMRT)

Revision 6.31  
May 26, 2023

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The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products

Mandatory fields are noted with an asterisk (\*). Consult the instructions tab for guidance on how to answer each question.

8) Has all applicable smelter information received by your company been reported in this declaration? (\*)

	Answer	Comments
Tantalum (*)	Yes	
Tin (*)	Yes	
Gold		
Tungsten (*)	Yes	

### Answer the Following Questions at a Company Level

Question	Answer	Comments
A. Have you established a responsible minerals sourcing policy? (*)	Yes	
B. Is your responsible minerals sourcing policy publicly available on your website? (Note – If yes, the user shall specify the URL in the comment field.) (*)	Yes	<a href="http://www.upmet.com">www.upmet.com</a>
C. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program? (*)	Yes	
D. Have you implemented due diligence measures for responsible sourcing? (*)	Yes	
E. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)	Yes, using other format (describe)	email requests for completed template for a either a company or product list declaration
F. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Yes	
G. Does your review process include corrective action management? (*)	Yes	
H. Is your company required to file an annual conflict minerals disclosure? (*)	No	





To ensure all required fields have been populated before submitting to your customers review form for any line items highlighted in red  
[Click here to return to Declaration tab.](#) [Click here to return to Smelter List](#) [Click here to return to Product List](#)

Required fields remaining to be completed: 6



Required Fields	Answer provided	Notes	Hyperlink to source
Company Name (*)	United Performance Metals	Complete	
Declaration Scope or Class (*)	B. Product (or List of Products)	Complete	
		Complete	
Contact Name (*)	Josh Fields	Complete	
Email - Contact (*)	Fields@upmet.com	Complete	
Phone - Contact (*)	513-670-6500	Complete	
Authorizer (*)	Michael McCord	Complete	
Email - Authorizer (*)	mccord@upmet.com	Complete	
Effective Date (*)	6-Jun-2023	Complete	
1. Do any 210 intermediaries exist or exist in the past 120 days in the immediate upstream? (*)			
Tentative (*)	Yes	Complete	
Yes (*)	Yes	Complete	
No	No	Complete	
Tentative (*)	Yes	Complete	
2. Does any 210 remain in the product(s)? (*)			
Tentative (*)	Yes	Complete	
Yes (*)	Yes	Complete	
No	No	Complete	
Tentative (*)	Yes	Complete	
3. Do any of the smelters in your supply chain source its 210 from the covered countries? (SEC item, see instructions tab) (*)			
Tentative (*)	No	Complete	
Yes (*)	No	Complete	
No	No	Complete	
Tentative (*)	No	Complete	
4. Do any of the smelters in your supply chain source its 210 from conflict affected and high-risk areas? (*)			
Tentative (*)	No	Complete	
Yes (*)	No	Complete	
No	No	Complete	
Tentative (*)	No	Complete	
5. What percentage of relevant suppliers have provided a response to your supply chain survey? (*)			
Tentative (*)	100%	Complete	
Yes (*)	100%	Complete	
No	No	Complete	
Tentative (*)	100%	Complete	
6. Have you identified all of the smelters supplying the 210 to your supply chain? (*)			
Tentative (*)	Yes	Complete	
Yes (*)	Yes	Complete	
No	No	Complete	
Tentative (*)	Yes	Complete	
7. Has all applicable smelter information received by your company been reported in this declaration? (*)			
Tentative (*)	Yes	Complete	
Yes (*)	Yes	Complete	
No	No	Complete	
Tentative (*)	Yes	Complete	
8. Have you established a responsible minerals sourcing policy? (*)	Yes	Complete	
9. Is your responsible minerals sourcing policy publicly available on your website? (Note - If yes, the user must specify the URL in the comment field.) (*)	Yes	Complete	
The URL in the comment field	www.upmet.com	Complete	
10. Do you require your direct suppliers to ensure the 210 from smelters whose due diligence practices have been validated by an independent third party audit program? (*)	Yes	Complete	
11. Have you implemented due diligence measures for responsible sourcing? (*)	Yes	Complete	
12. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)	Yes, using other format (describe)	Complete	
13. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Yes	Complete	
14. Does your review process include corrective action management? (*)	Yes	Complete	
15. Is your company required to file an annual conflict minerals disclosure? (*)	No	Complete	
Product List	One or more product / item numbers have been provided	Complete	
Smelter List - Tentative		Complete	
Smelter List - Tin		Complete	
Smelter List - Gold		Complete	
Smelter List - Tungsten		Complete	
16. Have you identified and listed all mineral sources? (Note - If yes, the user must specify the URL in the comment field.) (*)	Yes	Complete	



Completion required only if reporting level "Product (or List of Products)" selected on the 'Declaration' worksheet.

[Click here to return to Declaration tab](#)

Manufacturer's Product Number (*)	Manufacturer's Product Name	Comments
HX Nickel Alloy	N06002	Contains Tungsten primarily from scrap/recycled sources
718 Nickel Alloy	N07718	Contains Tantalum primarily from scrap/recycled sources
X-750 Nickel Alloy	N07750	Contains Tungsten primarily from scrap/recycled sources
20 Nickel Alloy	N08020	Contains Tantalum primarily from scrap/recycled sources
C276 Nickel Alloy	N10276	Contains Tungsten primarily from scrap/recycled sources
230	N06230	Contains Tungsten primarily from scrap/recycled sources
L605 Cobalt Alloy	R30605	Contains Tungsten primarily from scrap/recycled sources
188 Cobalt Alloy	R30188	Contains Tungsten primarily from scrap/recycled sources
410 Stainless Steel	S41000	Contains Tin primarily from scrap/recycled sources
418 Greek Stainless Steel	S41800	Contains Tungsten primarily from scrap/recycled sources
422 Stainless Steel	S42200	Contains Tungsten primarily from scrap/recycled sources
400 Nickel Alloy	N04400	No conflict minerals
600 Nickel Alloy	N06600	No conflict minerals
601 Nickel Alloy	N06601	No conflict minerals
617 Nickel Alloy	N06617	No conflict minerals
625 Nickel Alloy	N06625	No conflict minerals
C263 Nickel Alloy	N07263	No conflict minerals
800 Nickel Alloy	N08800	No conflict minerals
800 H Stainless Steel	N08810	No conflict minerals
800 AT Stainless Steel	N08811	No conflict minerals
825 Nickel Alloy	N08825	No conflict minerals
WASPALLOY	N07001	No conflict minerals
R41	N07041	No conflict minerals
15-5 Precipitation Hardenable Stainless Steel	UNS S15500	No conflict minerals
17-4 Precipitation Hardenable Stainless Steel	S17400	No conflict minerals
17-7 Precipitation Hardenable Stainless Steel	S17700	No conflict minerals
301 Stainless Steel	S30100	No conflict minerals
302 Stainless Steel	S30200	No conflict minerals
303 Stainless Steel	S30300	No conflict minerals
304 Stainless Steel	S30400	No conflict minerals
304L Stainless Steel	S30403	No conflict minerals
304H Stainless Steel	S30409	No conflict minerals
309 Stainless Steel	S30900	No conflict minerals
309S Stainless Steel	S30908	No conflict minerals
310 Stainless Steel	S31000	No conflict minerals
310S Stainless Steel	S31008	No conflict minerals
316 Stainless Steel	S31600	No conflict minerals
316L Stainless Steel	S31603	No conflict minerals
2205 Stainless Steel	S31803	No conflict minerals
321 Stainless Steel	S32100	No conflict minerals
321H Stainless Steel	S32109	No conflict minerals
347 Stainless Steel	S34700	No conflict minerals
347H Stainless Steel	S34709	No conflict minerals
A286 Precipitation Hardenable Stainless Steel	S66286	No conflict minerals
Titanium Grade (according to ASTM B265)		
COMMERCIAL PURE GRADE 1	UNS R50250	No conflict minerals
COMMERCIAL PURE GRADE 2/2H	UNS R50400	No conflict minerals
COMMERCIAL PURE GRADE 3	UNS R50550	No conflict minerals
COMMERCIAL PURE GRADE 4	UNS R50700	No conflict minerals
6AL-4V GRADE 5	UNS R56400	No conflict minerals
CP GRADE 7	UNS R52400	No conflict minerals
TI ALLOY GRADE 12	UNS R53400	No conflict minerals
3AL-8V-6CR-4MO-4ZR ALLOY GRADE 19	UNS R58460	No conflict minerals
6AL-4V ELI ALLOY GRADE 23	UNS R56407	No conflict minerals
B16	UNS C36000	No conflict minerals
MIC 6		No conflict minerals
7075 AL	UNS A97075	No conflict minerals
6061 AL	UNS A96061	No conflict minerals