The Risk Readiness Assessment Revision Process

2021-2022
Antitrust Statement

It is the Copper Mark’s and the RMI’s (the Parties) policy to fully comply with all applicable laws, including antitrust and competition laws. The Parties do not condone or in any way seek to facilitate antitrust breaches. In particular, at meetings which the Parties convene or preside over, they do not permit any participants to discuss or share confidential proprietary or otherwise commercially sensitive information including:

- current or future pricing practices;
- terms and conditions of sale;
- outputs and quotas;
- market shares;
- product or marketing plans;
- business relations with suppliers and customers; or
- any other matter on which participants compete.

Discussing or sharing this type of information can have serious consequences for both the Parties and the participants at such meetings including heavy fines and lasting reputational damage. Participants should not hesitate to voice any concerns they may have regarding the conduct of others at such meetings. During the course of a meeting, if a participant believes that the discussion is turning to a sensitive or inappropriate subject, the participant will express that belief and request that the attendees return the discussion to a less sensitive area. If the discussion continues, the Chair will end the meeting.

To be clear, the Parties support responsible production practices as a whole and do not engage with matters relating to individual or generic pricing, terms or conditions of sale, production or sales levels, salaries, customers or suppliers. They make no commercial recommendations of any kind.
Agenda

- Overview of the Risk-Readiness Assessment (RRA)
- Objectives of the Revision
- The RRA Revision Process
  - What
  - How
  - Who
  - When
- How to Engage
What is the Risk Readiness Assessment?

A set of criteria to promote a common understanding of good practices and a means to consistently assess risks and actions to manage risks in the mineral supply chain.

**Used by over 200 sites across:**
- 79 Au (Gold)
- 47 Ag (Silver)
- 27 Co (Cobalt)
- 29 Cu (Copper)
- 73 Ta (Tantalum)
- 50 Sn (Tin)
- 74 W (Tungsten)

**Applicable to:**
- Mining
- Smelting / Refining
- Manufacturing

**RRA dashboard**
How is the Risk Readiness Assessment used?

**Self-Assessment:** Smelters / refiners participating the RMI’s Responsible Minerals Assurance Process (RMAP).

**Standard Setting:** Foundation for the RMI ESG Due Diligence Standard and the Copper Mark Criteria for Responsible Production.

**Site-Level Assurance:** The Copper Mark Assurance Process.

**Cross-Recognition:** Equivalency Matrix to further cross-recognition across responsible mineral production standards.
### Relevant Risk Areas

<table>
<thead>
<tr>
<th>GOVERNANCE</th>
<th>LABOR &amp; WORKING CONDITIONS</th>
<th>ENVIRONMENT</th>
<th>COMMUNITY</th>
<th>BUSINESS &amp; HUMAN RIGHTS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>21. Mine Closure and Reclamation</td>
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</table>
Methodology

Available here

Revision Date: 09 August 2021

Risk Readiness Assessment
Review Process

1. BACKGROUND AND INTRODUCTION

RMI's vision is that mineral supply chains contribute positively to social economic development globally. RMI serves as an umbrella organization for the voice of progressive industry to support responsible mineral production and sourcing broadly and convenes stakeholders to continually shape dialogue and practices. Working with its stakeholders, RMI is evolving business practices to support responsible mineral production and sourcing globally, including but not limited to conflict-affected and high-risk areas, providing companies with tools and resources that improve regulatory compliance, align with international standards, and support industry and stakeholder expectations.

To help achieve this purpose, we maintain governance processes to oversee the development of these tools and resources and ensure their global applicability, continual improvement and alignment with international best practices.

The Risk Readiness Assessment (RRA) is a voluntary self-assessment and self-reporting tool for any minerals and metals producers and processors to assess and communicate their environmental, social and governance management practices and performance. The RRA uses benchmarked industry 'norms' derived from a comparison of over 50 commonly used voluntary sustainability standards (VSS) in minerals supply chains (a 'Standards Comparison') and is representative of good management practice for over 30 issue areas covering the main themes of environment, governance, human rights, community, and labor. The RMI, in collaboration with TDI Sustainability, developed the methodology for the RRA, which includes the approach to selecting the issue areas and the VSS reviewed to establish the benchmark on which the RRA norms are based.

An executive summary of the RRA methodology can be found here: http://www.responsiblemineralsinitiative.org/media/docs/RRA/RRA_Methodology_Summary.pdf

The RRA is accessible on the RBAOnline platform.

This document defines the review process the RMI follows to ensure that:

1. The VSS, issue areas and norms used for the Standards Comparison are up to date and representative of the current landscape in mineral supply chains; and,
Objectives of the Revision
The RMI oversees the development of its tools to ensure their global applicability, continual improvement and alignment with international best practices. The last revision was completed in 2019.

The RMI and the Copper Mark jointly work to:

- Ensure the RRA is recognized and accepted as a credible set of criteria for responsible mineral production by key stakeholder groups.
- Respond to findings of benchmarking with other responsible mining standards.
- Clarify requirements for implementation and assurance of the RRA.
Risk Readiness Assessment: The Copper Mark Objectives

The Copper Mark seeks to ensure its standards address the most significant sustainability impacts of a copper production. It has defined six overarching objectives necessary to ensure the RRA is recognized as a credible set of criteria by key stakeholders:

- Support the move toCircularity
- Respect Human Rights
- Contribute to Social and Economic Development
- Increase Transparency
- Enhance Climate Action
- Support Compliance

Implement responsible production practices and contribute to:
Risk Readiness Assessment: The Copper Mark Objectives

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Description</th>
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<tr>
<td>Respect Human Rights</td>
<td>Provide decent work</td>
</tr>
<tr>
<td></td>
<td>Respect human rights</td>
</tr>
<tr>
<td>Enhance Climate Action</td>
<td>Reduce GHG emissions</td>
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<td></td>
<td>Ensure climate adaptation and mitigation</td>
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<tr>
<td>Contribute to Social and Economic Development</td>
<td>Build trust and shared value between companies and communities</td>
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<td></td>
<td>Establish inclusive decision making processes with affected stakeholders</td>
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<tr>
<td>Support the Move to Circularity</td>
<td>Integrate circularity in the design of your operations and products to minimize the impact of mining on the environment</td>
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<td>Reduce, recycle, repurpose or reuse resources to support the objective of zero waste</td>
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<tr>
<td>Increase Transparency</td>
<td>Increase trust &amp; accountability</td>
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<td>Enable collective approaches</td>
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<td></td>
<td>Encourage data sharing based on data needs of affected stakeholders</td>
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<td>Enable Compliance</td>
<td>Support regulatory compliance</td>
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<td></td>
<td>Enable market access (for upstream) and responsible sourcing (for downstream)</td>
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<td>Raise awareness and readiness for regulatory developments</td>
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Structure

GOVERNANCE

SOCIAL

ENVIRONMENT
Revision Process
The RRA Revision Process

Details on the RRA revision process are published by the RMI (here) and the Copper Mark (here).

- RMI’s standard development process is guided by the ISEAL Code of Good Practice. The RRA Review Process is defined here.
- The Copper Mark revises standards in accordance with its Standard Setting Procedure, accessible here.

“A good standard-setting process ultimately improves the quality of the standard and its uptake.”

What is the RRA?

- Voluntary standards included in the RRA methodology
- RRA structure
- Topic areas
- RRA Criteria
- Expectations on how to “meet” the RRA Criteria – the Criteria Guide
How will the process be done?

1. **FOUNDATION:** Application of the RRA Methodology to obtain the revised norms

2. **DEVELOP A CREDIBLE SET OF CRITERIA:** Incorporation of RMI / Copper Mark objectives, benchmarking results, stakeholder feedback and lessons learned

3. **ENSURE RECOGNITION BY KEY STAKEHOLDERS:** Technical Committee, focused consultations in workshops and public consultations

RRA 3.0
Who is involved?

**DECISION MAKING:**
The RMI Steering Committee | The Copper Mark Board of Directors, supported by the Advisory Council

**PROCESS MANAGEMENT:**
Staff of the RMI and the Copper Mark

**TECHNICAL WORK:**
- Main technical body: Technical Committee
- Supporting technical bodies:
  - RMI Working Group(s)
  - Copper Mark Technical Working Group, Transparency Working Group
  - Subject Matter Experts (incl., e.g. industry experts such as ICA RSTF, IWCC, CDA, civil society organizations, academia, consultants)
- Technical support provided by The Dragonfly Initiative

**STAKEHOLDER ENGAGEMENT:**
- 4 Workshops
- Two public consultations
- Targeted follow up with stakeholders from the workshops / public consultations
WHO: Technical Committee

The Technical Committee’s role is to support the revision process to ensure the RRA and Criteria Guide:

1. Cover all major environmental, social and governance issue areas.
2. Are recognized and accepted by key impacted stakeholder groups as reflecting core expectations for responsible mineral production practices.
3. Can be implemented by mineral producers and processors and their performance against the criteria can be assessed by independent third-party assessors.

PARTICIPANTS:

PRODUCERS
- Glencore
- Rio Tinto
- CMOC
- BHP
- Antofagasta
- LS Nikko
- Thaisarco

DOWNSTREAM
- Siemens Energy
- Nexans
- Intel
- Apple
- Ford

NON-INDUSTRY
- Carbon Trust
- IndustriALL
- Innpulsa
- CEMS Universidad del Pacifico
- Subject-matter experts (2)
- Arche Advisor
WHO: The Copper Mark

**BOARD OF DIRECTORS:**
Decision Making Body

**COPPER MARK ADVISORY COUNCIL:**
- Review and advise on revision objectives and approach
- Review drafts, advise on issues that are raised during consultation
- Endorse final version for the Board

**RMI STEERING COMMITTEE:**
Decision Making Body

**RMI DUE DILIGENCE PRACTICES TEAM:**
Review drafts, advise on issues that are raised during consultation

**RRA TECHNICAL COMMITTEE**

**TECHNICAL WG:**
Technical expertise and input

**TRANSPARENCY WG:**
Technical expertise and input

**OTHER INDUSTRY EXPERT GROUPS (ICA, RSTF, IWCC, CDA):**
Technical expertise and input
RMI Assurance Framework

**Revision Process**

**Downstream Companies**

- Suppliers
  - Traders, Processors, Manufacturers
- Smelters / Refiners
  - Processors
- Exporters, Traders, Crude Refiners
- Mines

**Suppliers**

- Recycled & Scrap

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**KEY**

- **Assurance Standard**
  - Mineral Scope
  - Implementing body

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**OECD Due Diligence**

- Downstream Assessment Program (DAP)
  - All Materials
    - Responsible Minerals Initiative
- Joint Due Diligence* Standard
  - Nickel, Copper, Lead, Zinc + by-products
  - Responsible Minerals Initiative & Copper Mark
- Mica Processor* Standard
  - Mica (DD+ESG)
  - Responsible Minerals Initiative & RMica
- ESG Mineral Supply Chains Standard
  - All Materials
  - Responsible Minerals Initiative

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**ESG**

- VAP/SVAP Standard
  - All Materials
  - RBA
- Risk Readiness Assessment (RRA) Self-Assessment
  - All Materials
  - Responsible Minerals Initiative & Copper Mark

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**RMI Recognized Upstream Standards and Assurance Mechanisms**

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* Standard jointly developed with partner organizations. For more information, please visit RMI’s Standards webpage.
When

Detailed timelines can be found here and are regularly updated.

<table>
<thead>
<tr>
<th>Step 1: Foundation</th>
<th>Q4 2021</th>
<th>Q1 2022</th>
<th>Q2 2022</th>
<th>Q3 2022</th>
<th>Q4 2022</th>
<th>Q1 2023</th>
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<td>Review of RRA Methodology</td>
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<td>Revision of RRA Criteria and Criteria Guide</td>
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<td>✔️</td>
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<td>Launch of Technical Committee</td>
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<tr>
<th>Step 2: Develop credible criteria – Revision 1</th>
<th>Q2 2022</th>
<th>Q3 2022</th>
<th>Q4 2022</th>
<th>Q1 2023</th>
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<tr>
<td>Technical Committee meetings</td>
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<td>Topic-focused workshops</td>
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<td>✔️</td>
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<tr>
<td>Engagement with subject matter experts</td>
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First Public Consultation

<table>
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<tr>
<th>Step 3: Recognition by key stakeholders – Revision 2</th>
<th>Q4 2022</th>
<th>Q1 2023</th>
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<tr>
<td>Technical Committee meetings</td>
<td>✔️</td>
<td>✔️</td>
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<tr>
<td>Targeted follow up with stakeholders from workshops and public consultation</td>
<td>✔️</td>
<td>✔️</td>
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Revision 3

Second Public Consultation

Revision 4

- Technical Committee meetings

Finalization and Publication
How to Engage
### How to engage

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<tr>
<td>• 4 topic-focused workshops by invitation only</td>
<td>• Public consultation announced via mailing &amp; website</td>
<td>• Public consultation announced via mailing &amp; website</td>
<td>• Publication via mailing &amp; website</td>
</tr>
<tr>
<td>• 1:1 outreach to subject matter experts</td>
<td></td>
<td>• 1:1 outreach to stakeholders from workshops / consultation</td>
<td>• Announcement of launch for implementation via mailing &amp; website</td>
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Ongoing: Provide feedback at any time to the RMI or the Copper Mark.
What Happens Next?

All comments received by the RMI and the Copper Mark are logged.

Staff logs proposed responses for each comment.

Upon request, RMI / Copper Mark will the responses to the specific comments received with individual stakeholders.

The Technical Committee receives the comment log with proposed responses from RMI and Copper Mark staff.

Substantive comments are reviewed and discussed by the Technical Committee.

Summaries will be published of:

- Workshop discussions
- Substantive comments received in public consultations
- Responses by RMI / Copper Mark to substantive comments
Other Considerations

I’m interested in a specific topic; do I need to review the whole document?

No, you can provide input on specific topics of interest. Our workshops will be topic-focused as well to facilitate discussions of specific issues.

Do I have to use a form to comment?

You can share comments in any format. For the public consultations, a form will be provided to facilitate the collection of feedback and we encourage stakeholders to use it.

Do I need to provide contact information?

Yes, we encourage stakeholders to provide us with contact information so that we can follow up for any clarification.

How will I know if my comment was considered?

Summaries will be published of substantive comments and how these were addressed.

Detailed responses to individual comments are provided upon request. If you would like to receive those, please email the RMI or the Copper Mark.
How to Engage

Contact

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Responsible Business Alliance  
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msmirnova@responsiblebusiness.org

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*Director of Assurance and Impact*  
The Copper Mark  
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hillary.amster@coppermark.org