



OECD DUE DILIGENCE TOOLBOX FOR 3TG EXPORTERS IN THE GREAT LAKES REGION



Kingdom of the Netherlands



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LIST OF ABBREVIATIONS

3TG	Tin, Tungsten, Tantalum and Gold
EITI	Extractive Industries Transparency Initiative
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH
CoC	Chain of Custody
ICGLR	International Conference on the Great Lakes Region
ITSCI	Extractive Industries Transparency Initiative (EITI).
KYC	Know Your Counterpart
PEP	Politically Exposed Person
NGO	Non-Governmental Organisation
OECD	Organisation for Economic Co-operation and Development
RCM	Regional Certification Mechanism
RMAP	Responsible Minerals Assurance Process
RMI	Responsible Minerals Initiative
TPA	Third-Party Audit

INTRODUCTION

About this booklet

This booklet provides a toolbox whose objective is to support upstream mineral supply chain actors in implementing company due diligence frameworks in accordance with the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* and the *ICGLR Regional Certification Mechanism*. The toolbox is specifically designed to support exporters of tin, tantalum, tungsten and gold in the ICGLR region to prepare for and successfully pass Third-Party Audits under the Regional Certification Mechanism. It can also be used by other upstream supply chain actors such as mine site operators and traders.

The International Conference on the Great Lakes Region (ICGLR) is an inter-governmental organization of twelve Member States in the African Great Lakes Region. Its establishment was based on the recognition that political instability and conflicts in these countries have a considerable regional dimension and thus require a concerted effort in order to promote sustainable peace and development.

One of the main instruments developed by the ICGLR and endorsed by the Member States is the ICGLR Regional Certification Mechanism (RCM). The objective of the RCM is to ensure that mineral supply chains for four minerals – tin, tantalum, tungsten and gold (collectively known as 3TGs) – do not directly or indirectly provide support to non-state armed groups, public or private security forces engaged in illegal activities or human rights abuse.

What is due diligence?

Due diligence is an ongoing process, both proactive and reactive, that enables companies to identify and manage actual or potential risks arising from their operations and business relationships. Due diligence aims to prevent or reduce the adverse impacts on peace, security and human rights that arise from the extraction and trade of minerals and concentrates. To implement due diligence, companies need to assess the risks related to their businesses activities by examining the facts surrounding their operations and relationships, and then evaluating these facts against standards set by national and international laws, guidelines for responsible business conduct from international organizations, government-endorsed tools, private sector voluntary initiatives, and the company's own policies.

International standards for company due diligence processes in the extractive sector are set out in the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* (hereafter referred to as *OECD Due Diligence Guidance*), which provides detailed recommendations to help companies respect human rights and avoid contributing to conflict through their mineral purchasing practice. While the *OECD Due Diligence Guidance* is global in scope and applies to all mineral supply chains, this particular toolbox focuses on 3TGs only.

For upstream companies in the ICGLR Member States, the key steps in due diligence include:

- Implementing strong management systems and internal processes to address risks linked to sourcing minerals from conflict-affected and high-risk areas.
- Establishing traceability or a chain of custody back to the mine of origin.
- Trading with mine sites validated as “green” under the ICGLR Regional Certification Mechanism (RCM). Under specific circumstances and conditions as set out in the RCM, trade can continue under Blue and Yellow status.
- Conducting on-the-ground risk assessments of mines, producers and traders to check for conflict financing, human rights abuses, formality/transparency, bribery, tax evasion, fraud and money laundering.
- Engaging collaboratively with local governments, civil society organizations, and local businesses to prevent and mitigate impacts and monitor risks.
- Requesting and participating in ICGLR Third-Party Audits.

- Reporting publicly on due diligence efforts.

What is the OECD 5-step framework for risk-based supply chain due diligence?

The OECD Due Diligence Guidance outlines how companies can identify and more effectively manage risks across the entire mineral supply chain. It is intended to aid in implementing due diligence practices by following a 5-step framework.

Step 1	Establish strong management systems - Adopt due diligence policies and build internal capacity to implement them. Engage with suppliers and business partners. - Develop internal controls and transparency over the mineral supply chain. - Collect data and set up grievance mechanisms.
Step 2	Identify, assess and prioritize risks in the supply chain - Map the factual circumstances of the operations, supply chains and business partners. - Prioritize risks as set out in Annex II of the Guidance.
Step 3	Design and implement a strategy to respond to identified risks - Report risk assessment findings to senior management. - Disengage from suppliers associated with the most harmful impacts (human rights abuse and conflict finance). - If no disengagement, take steps to mitigate risk and increase leverage.
Step 4	Carry out independent third-party audits of due diligence practices - Carry out independent third-party audits through the ICGLR Third-Party Audit process to verify that due diligence practices have been implemented properly. - Allow access to company sites and relevant documentation. - Facilitate on-site visits and contacts with suppliers selected by the audit team.
Step 5	Report annually on supply chain due diligence - Publicly report on supply chain due diligence policies. - Respond to stakeholder questions, concerns and suggestion.

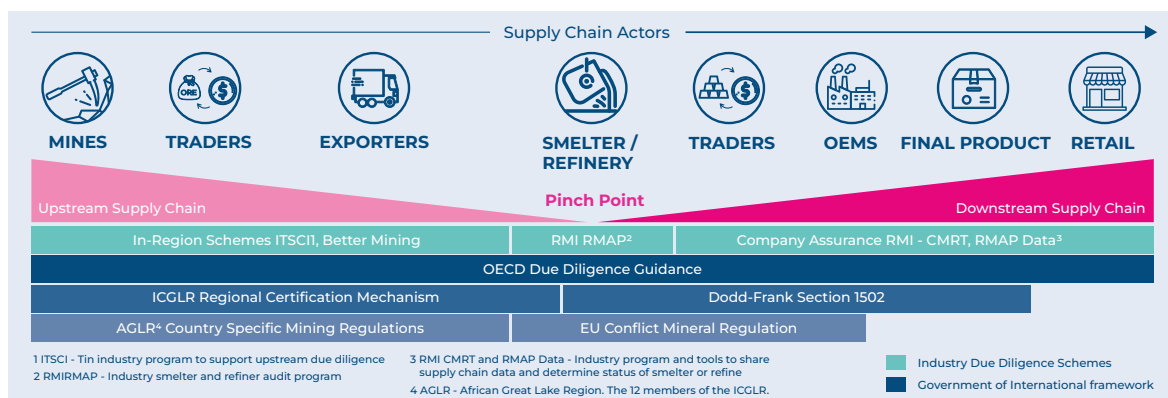
What is the ICGLR Regional Certification Mechanism?

The RCM was developed in alignment with the OECD Due Diligence Guidance. It supports supply chain actors in the Great Lakes Region in identifying risks and implementing mitigation strategies. It focuses on the 3TGs which are categorized as “Conflict Minerals” under the Dodd-Frank Consumer Protection Act (Section 1502) and the EU Mineral Conflicts Regulation. Within the ICGLR RCM, they are referred to as “Designated Minerals”. The RCM consists of five key components. They are designed to identify illegal interference by non-state armed groups and security forces and to address human rights abuses at any point in the supply chain



What is the relationship between the ICGLR RCM and other due diligence initiatives?

The RCM provides a framework for Member States and upstream supply chain actors to follow with the objective to implement programs and processes to eliminate support for non-state armed groups and human rights abuses. There are several other frameworks and industry initiatives that companies can leverage as they implement their due diligence programs. The RCM allows for supply chain actors to use third-party traceability solutions for the upstream or implement their own systems. Below figure illustrates some of the existing frameworks that must be followed and initiatives that companies may use to support their due diligence efforts.



OECD STEP

1

ESTABLISH STRONG MANAGEMENT SYSTEMS

The objective of OECD Step 1 (establish strong management systems) is to ensure that your company's management systems and internal processes effectively address the risks related to sourcing minerals from conflict-affected and high-risk areas.

According to the first step of the OECD Due Diligence Guidance, companies should:

OECD Step 1 Checklist

☐	Create a policy for responsible mineral supply chains that aligns with Annex II of the Guidance.
☐	Form a team to manage supply chain due diligence, ensuring a budget is allocated and a senior manager is accountable.
☐	Set up an internal system for transparency, information gathering and documentation of due diligence processes, findings and decisions.
☐	Assign a unique reference number to each mineral input and output, making it clear if any tampering occurs.
☐	Implement a chain of custody or traceability system that provides detailed information on each mineral, including its mine of origin, extraction dates and consolidation locations, preferably with supporting documentation.
☐	Gather information on the production, transport, trade and export of minerals, including supplier identities when relevant, and share this information with downstream buyers or required institutional bodies.
☐	Collect stakeholder grievances through individual or collaborative mechanisms.
☐	Minimize cash purchases when possible and ensure that unavoidable cash transactions are supported by verifiable documentation and routed through official banking channels.
☐	Build long-term relationships with suppliers instead of relying on short-term contracts to gain leverage. Communicate your responsible supply chain policies to suppliers and include them in contracts or agreements.
☐	Help suppliers improve their performance and adhere to your company's supply chain policy.

What are management systems?

A management system describes the way in which companies organize themselves in their structures and processes in order to act systematically, ensure smooth processes and achieve planned results. Management systems typically consist of a set of policies, procedures and processes that an organization uses to achieve its objectives. Management systems can help ensure that an organization's people are able to complete their tasks and that the organization runs smoothly. The complexity of a management system depends on the organization and its specific context. For example, smaller organizations may only need strong leadership and clear expectations for employees. More complex organizations may need extensive documentation and controls.

How can I strengthen engagement with my suppliers?

A supply chain policy should be incorporated into contracts and/or agreements with suppliers. Where necessary, assist suppliers in building capacities with a view to improving due diligence performance.

Capacity building of a company's suppliers can be done through training or working with them directly

to address any identified risks. There may be local civil society organisations that can assist in conducting workshops or training sessions for miners, cooperatives and traders.

Companies should also consult with government agencies involved in the management of the mining sector when engaging with suppliers. Moreover, it is important to engage with government and civil society in the monitoring of mitigation measures.

What are Chain of Custody Systems and what systems are authorised under the ICGLR Regional Certification Mechanism?

Chain of Custody systems are a critical component of the OECD due diligence process and the ICGLR RCM. Chain of Custody systems record the sequence of individuals or entities that have custody of minerals as they move through the upstream supply chain. This system includes not only the physical transfer of materials but also associated records of each step in the process, encompassing production, combination, processing, trading, transportation and export. The RCM requires that exporters provide tracking and records collected under a Chain of Custody system prior to the receipt of an ICGLR Export Certificate.

- ICGLR Member States are responsible for ensuring that Chain of Custody systems operate in conformity with RCM requirements. This involves regulating, licensing and monitoring these systems to guarantee their effectiveness in preventing the financing of armed groups through the supply chain.
- Exporters must guarantee that a licensed Chain of Custody system is implemented for all minerals within their supply chain. This ensures that each mineral is traceable and verifiable throughout the supply chain.

Chain of Custody Systems may be operated by licensed third-party providers, exporters, or ICGLR Member States. The critical aspect is ensuring that these systems function fairly and equitably, particularly when multiple systems are in operation. Failure to maintain this integrity may result in the revocation of their license.

What is a grievance mechanism?

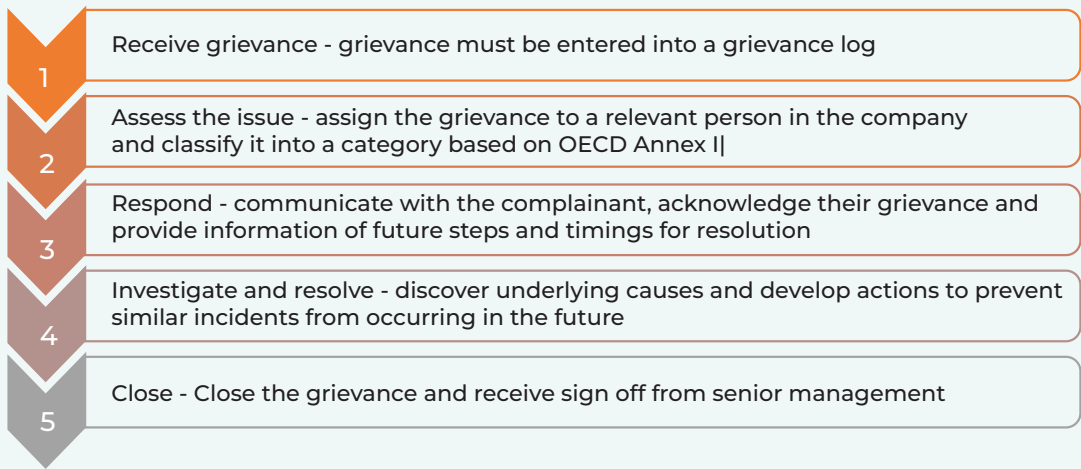
Mining activities may lead to concerns and complaints from community members and stakeholders affected by the projects. Under the OECD Due Diligence Guidance, companies are required to establish processes for systematically receiving, tracking and resolving complaints from individuals, workers, communities and civil society organizations that are negatively impacted by their business activities. These processes, often referred to as grievance, complaints, redress, or accountability mechanisms, should be developed in consultation with affected stakeholders, including communities and civil society.

The United Nations Guiding Principles on Business and Human Rights provide further guidance on grievance mechanisms. For these mechanisms to be effective, they must be accessible, predictable, transparent and seen as legitimate by the affected stakeholders. Key considerations for designing an effective grievance mechanism include:

- The process for filing, acknowledging, investigating and resolving complaints and grievances.
- Ensuring the confidentiality of the complainant's identity.
- Allowing for the submission of anonymous complaints, if necessary.
- Providing assistance to those facing barriers to accessing the grievance mechanism, including women, children and marginalized or vulnerable groups.
- Tracking, recording and publicly sharing information on complaints, grievances and their resolutions.

A low-threshold grievance mechanism for exporters and traders could include options such as a dedicated email inbox, an online submission form, or the ability to submit grievances via phone or in writing.

Grievance Mechanisms Process Chart



OECD STEP

2

IDENTIFY, ASSESS AND PRIORITIZE RISKS IN THE SUPPLY CHAIN

The objective of OECD Step 2 (identify and assess risks in the supply chain) is to identify and evaluate risks related to the extraction, trading, handling and export of minerals from conflict-affected and high-risk areas.

OECD Step 2 Checklist

☐	Map your supply chain to understand where your minerals come from. You can do this by reviewing research reports and consulting with local governments and civil society organizations.
☐	Set up teams to conduct on-the-ground assessments and gather information about extraction, trade, handling, refining and export processes.
☐	If an assessment has already been done (e.g. by a government inspector or an industry scheme), review it to ensure it is credible, current and relevant to your supply chain risks.
☐	Check if the mines you source from have been inspected by a competent authority under the ICGLR RCM and classified as “green”, “yellow” or “blue.” You can only source from blue mines after completing your own assessment; sourcing from “red” mines is not allowed.
☐	Regularly update your risk assessments as new information or changes occur in the supply chain.

How do companies know if they are sourcing from a conflict-affected or high-risk area?

Conflict-affected and other high-risk areas are marked by institutional weakness, political instability, insecurity, armed conflict, widespread violence, or other threats to human safety. Companies should be particularly vigilant if they encounter the following red flags:

- Minerals that originate from or transit through red-flag locations.
- Suppliers or upstream companies that operate in red-flag locations or have sourced minerals from such locations within the past 12 months.
- Risk assessments indicating a reasonable suspicion that the minerals may contribute to conflict, human rights abuses, bribery, or other significant financial crimes linked to mineral extraction, transport, or trade.

When companies identify these red flags, they must implement the enhanced due diligence standards and processes recommended in the OECD Due Diligence Guidance.

All 12 ICGLR countries are considered red-flag locations.

How do I map the factual circumstances of my supply chain?

As part of the risk assessment, exporters and traders need to map their supply chains. This involves identifying all actors within the supply chain starting from the mine site, including the mine site operator, cooperatives, intermittent traders (negotiants), transporters, exporters (comptoirs) and international traders (if they are purchasing from them).

In mapping your supply chain you should ask the following key questions:

Suppliers and business partners	- Who are the suppliers and partners involved in financing, extracting, trading and transporting minerals from the extraction site to where the company takes ownership? - What procurement and due diligence systems do these suppliers use? - What supply chain policies have they adopted and how are these integrated into their management practices? - How do they set up internal controls for handling the minerals?
Conditions of mineral extraction	- Where exactly do the minerals come from and which mines were involved? How were they extracted? - If artisanal or small-scale mining (ASM) was used, who was involved (individuals, cooperatives, or small businesses)? What taxes or fees were paid and were these payments disclosed? - Are there any armed groups or security forces involved in the mining process, such as controlling the mine, transport routes, or collecting taxes? - Is security funded by miners or through production taxes? - Has the mine been inspected by the government, an independent third-party audit under the ICGLR RCM, or upstream assurance mechanism?
Conditions of mineral transport, handling and trade	- Were the mineral buyers/traders located at the mine or elsewhere? Were the minerals from different miners processed and sold separately, or mixed before reaching the market? - Who managed the minerals? Are any of the managers known or suspected of being involved with non-state armed groups during extraction or trade? - To what extent are public or private security forces, or non-state armed groups, involved in the trading, transporting, or taxing of these minerals? Are they benefiting through intermediaries or exporters? - How often do security forces or non-state armed groups appear along transportation and trade routes? - Are there reports of human rights abuses related to the trading, transporting, or taxing of these minerals? - What evidence is available to verify the downstream trade, such as official documents, transportation routes, licenses, cross-border transactions, or the presence of armed groups or security forces?

Additionally, companies should conduct Know-Your-Counterpart (KYC) assessments of their business partners. A KYC assessment should gather information on the ownership (including beneficial ownership) of the business partner, the corporate structure (including the names of directors), and any political, government, or military affiliations of these partners. Sanctions checks should be done on beneficial owners.

Companies must share the supply chain mapping and KYC assessments with their downstream business partners and during ICGLR Third-Party Audits.

What are ICGLR RCM mine site criteria?

Your company should also incorporate information obtained from ICGLR Member States mine site inspections as part of your risk assessment process.

The ICGLR RCM requires mine site inspection and validation to evaluate mine sites that produce or sell designated minerals against specific criteria related to the objectives of the RCM. The aim is to ensure that the extraction, processing, aggregation and/or sale of designated minerals from a mine site does not directly or indirectly support non-state armed groups or public or private security forces involved in illegal activities and/or human rights abuses.

According to the ICGLR RCM, mine sites must be inspected annually by a mine site inspector employed or engaged by the Member State (a third party). The results of these mine site inspections will determine the status assigned to each site.

The following details the different mine site statuses alongside their definitions and outcomes.

Not inspected (blue)	Valid (green)
- A mine site that has not been inspected according to ICGLR RCM requirements, or a Valid (Green) mine that has not been re-inspected in the past year, is considered uninspected. - A mine site can hold Blue Status for up to 3 years; if it is not inspected within that time, it will turn into Red Status. - A mine site previously rated Red (Not Valid) or Yellow (Provisionally Valid) cannot become Blue (Not Inspected) unless it first receives Valid (Green) Status.	- A mine site that has been inspected according to ICGLR RCM requirements and meets all criteria is classified as Valid (Green). - A mine site can hold Green Status for up to 1 year. - A Green mine site must be re-inspected every year.
Provisionally valid (yellow)	Not valid (red)
- A mine site that has been inspected according to ICGLR RCM requirements but does not meet one or more of the Provisionally Valid (Yellow) criteria is classified as Provisionally Valid (Yellow). - A Provisionally Valid mine is given a 6-month grace period to correct the issues or show significant improvement. - A Provisionally Valid mine site must request a Follow-Up Inspection within 6 months of receiving this status; failure to do so will result in the status changing to Not Valid (Red).	- A mine site that has been inspected according to ICGLR RCM requirements but violates one or more of the Red Status Criteria outlined in Appendix A2 of the RCM Manual is classified as Not Valid (Red). - A mine that has been Provisionally Valid (Yellow) but has not requested a Follow-Up Inspection within 6 months will also be classified as Not Valid (Red). - If a follow-up inspection reveals non-conformance with one or more Red Status criteria and the issues from Yellow Status have not been resolved or shown significant improvement, the site will be classified as Not Valid (Red).

Mine sites associated with Red Status criteria (see Appendix A2 of the RCM Manual) are suspended for a minimum period of three months and until a mine site inspection has verified that the identified red status criteria issues have been resolved.

Provisionally valid (yellow) mine site criteria

- Public security forces or their affiliates control, extort, or illegally tax at mine sites, transport routes, or mineral trading points.
- Mineral shipments leave the mine without being registered or tracked by a system that records their next destination.
- Material from an unknown mine is mixed with the mine's material.
- Mine owners, operators, or supply chain actors offer bribes to hide the origin of minerals.
- Mine owners, operators, or supply chain actors fail to pay taxes, fees, or royalties related to mineral extraction, trade, and export.
- The mine owner or operator refuses to allow Analytical Mineral Determination (AMD) sampling by the ICGLR or Member State.

Not valid (red)

- Non-state armed groups or their affiliates control, extort, or illegally tax at mine sites, transport routes, or mineral trading points.
- Children below the legal working age defined by the Member State are employed at the mine, forced labor is practiced, workers are made to work without compensation, and there are reports of torture, cruel treatment, or other gross human rights violations, including widespread sexual violence.
- The mine site owner or operator makes payments to illegal organizations, political parties, or political groups in violation of national laws.

If your company sources from a green mine site and an assessment was done in accordance with the ICGLR RCM, an industry scheme, or other third part, you are still required to review the assessment to

ensure it is credible, up-to date, and covers risks specific to your supply chain.

Can I source from “blue” or “yellow” mine sites?

Exporters can only source from blue mine sites after they have conducted their own on-the-ground assessment. A copy of the on-the-ground risk assessment must be shared with the government agency for mine site inspections, as well as with the ICGLR Secretariat. If during the on-the-ground risk assessments a red status criteria is identified, the exporter is not allowed to source from that mine site and must inform the Member State and ICGLR Secretariat regarding their findings.

For yellow status criteria identified during the assessment, the exporter may work with the supply chain actor/mine site to correct or mitigate the identified issues. However, the corrective measures should be completed within 6-month or at least demonstrate significant measurable improvement to continue to trade. They should also be communicated to the Member State and ICGLR Secretariat.

Companies can utilize the International Tin Supply Chain Initiative (ITSCI) baseline monitoring reports as part of their risk assessments. However, they are required to review these assessments and conduct on-the-ground evaluations at a representative number of mines. Additionally, companies may refer to ITSCI monthly reports or incident reports. It is important to note that these sources cannot be redacted, as due diligence remains the responsibility of the respective company.

Where do I find information on ICGLR mine site status?

To find out a mine site status, exporters should contact the mine site operator or the Member State organization assigned to perform mine site inspections.

OECD STEP

3

DESIGN AND IMPLEMENT A STRATEGY TO RESPOND TO IDENTIFIED RISKS

The goal of OECD Step 3 is to assess, and address identified risks to prevent or reduce negative impacts. Companies can collaborate on the recommendations in this section through joint initiatives. However, each company remains responsible for its due diligence and should ensure that any joint efforts consider their specific circumstances.

OECD Step 3 Checklist

☐	Share the results of your risk assessment with senior management, including the information you gathered and the identified risks in your supply chain.
☐	If you completed an on-site risk assessment, send a copy to your national government agency responsible for mine inspections and to the ICGLR Secretariat.
☐	Manage the identified risks by either continuing trade with clear risk reductions, temporarily pausing trade until you implement solutions, or stopping trade with the supplier.
☐	Create and implement a risk management plan.
☐	Keep track of the plan's progress by engaging with affected communities and stakeholders. If conditions change or if some risks still need addressing, conduct additional assessments. You should see significant improvements in reducing risks within six months of adopting the plan. If not, consider suspending or ending your relationship with the supplier.
☐	Make your risk assessment and mitigation plans available to relevant stakeholders, including suppliers, clients, government agencies and civil society.
☐	Use your influence over supply chain actors who can effectively prevent and reduce risks.
☐	Collaborate with suppliers and affected stakeholders to establish a strategy for effective risk mitigation.

How should companies respond to different types of risk?

Your company has two options for responding to supply chain risks:

First, you should immediately suspend or end relationships with suppliers if there is a reasonable suspicion that they are sourcing from or connected to parties committing serious human rights violations or providing support to non-state armed groups. This also includes suspending engagement with “red” mines under the ICGLR RCM.

Second, your company may continue working with suppliers if there is a risk of corruption, money laundering, non-payment of dues, or fraudulent chain of custody, as long as you implement risk management strategies to address these risks. It is essential to monitor how effective these strategies are in reducing the identified risks. If the situation does not improve within 6-months, you should disengage from those suppliers. Additionally, your company should share any risk assessments and mitigation plans with suppliers, clients, government agencies and civil society organizations.

What is a risk management plan?

A risk management plan is a structured approach to identify, analyze, assess, measure and monitor risks within your supply chain. The planning, implementation and monitoring of risk management efforts can be carried out in collaboration with local and central government authorities, upstream companies, civil society organizations and affected third parties. The OECD Due Diligence Guidance outlines several risk management options, including:

- Enhancing chain of custody and traceability systems to ensure compliance with national requirements under the ICGLR RCM.
- Formalizing security arrangements and reporting abusive units to the appropriate authorities.
- Establishing regular communication with assessment teams and networks (including civil society, local government officials and multi-stakeholder commissions) to monitor serious abuses or support for non-state armed groups or security forces.
- Reporting any identified risks to the relevant governmental authority.
- Monitoring and adjusting grievance mechanisms as necessary.

What is the role of upstream companies in risk management and mitigation?

Companies hold considerable leverage over their suppliers based on their business relationship, enabling them to effectively reduce significant risks of adverse impacts. If these companies choose to mitigate risks while maintaining or temporarily halting trade, their efforts should concentrate on constructively engaging with relevant stakeholders as needed.

Additionally, upstream companies can share their risk assessments and mitigation plans with local and central authorities, upstream suppliers, local civil society organizations and affected third parties.

OECD STEP

4

CARRY OUT INDEPENDENT THIRD-PARTY AUDITS OF EXPORTER'S DUE DILIGENCE PRACTICES

The goal is to conduct an independent third-party audit of the exporter's due diligence processes for responsible mineral supply chains from conflict-affected and high-risk regions. This step aims to enhance the due diligence practices of upstream operations, potentially through an industry-initiated or regional institutional mechanism that is supported by governments and works in collaboration with relevant stakeholders.

Step 4 Checklist

☐	Plan and implement an independent third-party audit in accordance with the ICGLR RCM to provide assurance that your company has implemented due diligence practices.
☐	Allow access to company sites.
☐	Provide relevant documentation to auditors.
☐	Facilitate on-site visits and contacts with suppliers selected by the audit team.
☐	Publish summary audit reports online on your company's webpage.
☐	Provide copies of audit reports to downstream business partners.

What are ICGLR Third-Party Audits?

Under the ICGLR Third-Party Audit programme, all exporters of tin, tungsten, tantalum, and gold (3TG) must undergo audits managed by the ICGLR Secretariat and overseen by the ICGLR Audit Committee. These exporters in the Great Lakes Region are audited every three years.

The programme provides independent verification to ensure that exporters' mineral supply chains, from the mine site to export, comply with the RCM requirements. The audit scope encompasses the entire mineral supply chain, starting from mine sites to export destinations.

For producer countries, audits will trace the mineral chain from the exporter back to the mines where the minerals originated, including all supply chain actors involved in mining, buying, selling, transporting, or handling the minerals from mine site to export. The criteria for exporter status can be found in Appendix E1 of the RCM Manual.

For processor countries, audits will follow the mineral chain from the exporter being audited back to the foreign exporter who supplied the minerals. This includes all parties involved in mining, buying, selling, transporting, or handling the minerals from foreign suppliers to the exporter.

ICGLR Third-Party Audits require auditors to conduct on-site inspections along the mineral chain, including at mine sites. Audits will review the exporter's management systems and the compliance of each supply chain actor with RCM requirements. Additionally, auditors will assess the exporter's risk assessment and management processes to ensure they align with the OECD Due Diligence Guidance recommendations.

The different exporter statuses are detailed alongside their definitions and outcomes below:

Not audited (blue)	Valid (green)
- An exporter that has not yet received an ICGLR TPA but requested one before the end of its first year of operation, or a Valid exporter that has requested an ICGLR TPA (with at least 3 months notice before its current TPA expires) but has not yet received the new TPA, is classified as Not Inspected (Blue). - An exporter can retain Blue Status until its first ICGLR TPA is completed and for a maximum of 3 years thereafter. - An exporter that has had an ICGLR TPA with no identified non-conformances is also considered Valid (from blue status to green). The exporter may purchase and/or produce Designated Minerals for certified export.	- An exporter that has received an ICGLR TPA with no identified non-conformances is classified as Valid (Green). - An exporter can maintain Green Status for up to 3 years. - A Green Status exporter must be re-audited at least once every 3 years. The exporter may purchase and/or produce Designated Minerals for certified export.

Provisionally valid (yellow)	Not valid (red)
- An exporter that has received an ICGLR TPA but has one or more identified issues with the Provisionally Validated (Yellow) Criteria outlined in Appendix E1 is classified as Provisionally Valid (Yellow). - A follow-up audit can reclassify the exporter as Provisionally Valid (Yellow) only if significant measurable improvement in all Yellow Status Criteria is observed. - A Provisionally Valid (Yellow) exporter is given a 6-month grace period to correct the issues or demonstrate significant improvement. - If a follow-up audit does not resolve the yellow status criteria or shows no significant measurable improvement, the exporter will be classified as Not Valid (Red). - A Provisionally Valid (Yellow) exporter must request a follow-up TPA within 6 months of receiving this status; failure to do so will result in the status changing to Not Valid (Red). The exporter can purchase and/or produce minerals for certified export during the time that it is classified Provisionally Validated (Yellow) Status.	- An exporter that has received a TPA but has one or more major non-conformances identified is classified as Not Valid (Red). - An exporter is also classified as Not Valid (Red) if it fails to request a follow-up audit within 6 months of receiving Provisionally Valid (Yellow) Status. - If an exporter undergoes a follow-up audit but does not resolve the Red Status Criteria, or show no significant measurable improvement, it will remain classified as Not Valid (Red). - An exporter that does not request a TPA before the end of its first year of operation will also be deemed Not Valid (Red). - A minimum suspension period of three months applies to Not Valid (Red) exporters. The exporter is not allowed to purchase, process and/or produce minerals for export.

The Red and Yellow criteria for exporter status are contained in the tables below. More detailed criteria are laid out in Appendix E1 of the RCM Manual.

Yellow (Provisionally Valid) criteria for exporters

- Public security forces or their affiliates control, extort, or illegally tax at mine sites, transport routes, or anywhere in the supply chain, including at the exporter level.
- Mineral shipments leave the mine site without being registered or tracked by a chain of custody system that follows the minerals through the supply chain to the exporter.
- Government officials extract significant taxes or payments from supply chain actors in the exporter's supply chain that are disproportionate to any services provided, in violation of the Member State's mineral code or regulations.
- Material from an unknown mine site is entering or being mixed with the mine's material.
- Any supply chain actor in the exporter's chain offers, promises, gives, or demands bribes for mineral extraction, trade, handling, transport, or export.
- Any supply chain actor in the exporter's chain fails to pay all taxes, fees and royalties related to mineral extraction, trade and export.
- Any supply chain actor in the exporter's chain refuses to allow Analytical Mineral Determination (AMD) sampling by the ICGLR or Member State.
- The exporter has not established a robust management system in line with OECD Due Diligence Guidance.
- The exporter did not identify and assess risks in their supply chain according to OECD Due Diligence Guidance.
- The exporter failed to design and implement a strategy to address identified risks as per OECD Due Diligence Guidance.
- The exporter did not provide annual reports on supply chain due diligence in accordance with OECD Due Diligence Guidance.

Red (Not Valid) criteria for Exporters

- Non-state armed groups or their affiliates control, extort, or illegally tax at mine sites, transport routes, or anywhere in the supply chain, including at the exporter level.
- Child labor, forced labor, inhumane and degrading treatment, and other serious human rights violations, including widespread sexual violence, occur in the exporter's supply chain.
- Payments made by the exporter or any supply chain actors to illegal organizations, political parties, or political groups violate national laws.
- Designated minerals from a Not Valid (Red) mine site are entering the exporter's supply chain or being mixed with Designated Minerals produced in a clean supply chain.

How do I request an ICGLR TPA?

Exporters should contact the ICGLR Secretariat at auditcommittee@icglr.org to request a TPA.

The request must be initiated within the first year of start-up of the exporter or prior to their existing 3-year status period ending (i.e. 3 years after their previous audit). This request should be done via email. Exporters will be required to pay for the audit prior to the audit being initiated.

What information does my company need to make available for ICGLR TPAs?

When requesting a Third-Party Audit, the exporter has to send to the ICGLR Secretariat and the Audit Committee detailed information on the following items, including regarding their respective operations during the previous 12 months. This will facilitate audit planning, contract negotiation and logistical arrangements. These include:

- Name and location of auditee and related businesses;
- List of all other actors that actively contribute to the exporter's mineral supply chain;
- Accessibility of the auditee from the main international airport or closest city – distance, means of access;
- Size of auditee – number of employees, physical size, and type of operation (export, processing and/or extraction of minerals);
- Number, type and location/address of direct suppliers (mines, traders, processors);
- Number of transactions/purchases and volume of material purchased;
- Participation in any existing due diligence initiative and related reports, including previous independent third-party audits, OECD Step 5 Due Diligence Report.

During the audit the exporter will need to make available all records associated with their business including trading, pricing, chain-of-custody, training, annual reports and other information as requested by the auditor. The exporter will help facilitate logistics to and from mine sites as needed. Exporters will need to assure that if a third-party upstream mechanism (i.e. ITSCI, Better Sourcing Programme) is used, the mechanism provides all the necessary and requested information to the auditor. Failure of the mechanism to provide information may lead to the exporter receiving a Red Status, Not Valid.

OECD STEP

5

REPORT ANNUALLY ON SUPPLY CHAIN DUE DILIGENCE

The aim of OECD Step 5 is to publicly disclose due diligence efforts for responsible mineral supply chains from conflict-affected and high-risk areas, thereby building public trust in the actions taken by companies.

While step 5 concludes the OECD framework, it is important to note that due diligence is an ongoing process that requires to repeat and/or revise certain steps on a regular basis.

OECD Step 5 Checklist☐

Annually report on the company's due diligence efforts for responsible supply chains of minerals from conflict-affected and high-risk areas. Reports should focus on the actions taken by the company to address identified risks.

☐

Publish reports online and share copies with relevant stakeholders, such as government and downstream business partners.

☐

Provide a description of any audits, such as the ICGLR TPA, in which the company has participated.

How should I report on supply chain due diligence?

Your company due diligence report should contain the following elements:

Company Management Systems:

- Outline your company's supply chain due diligence policy and identify who is responsible for managing it.
- Explain the controls put in place to oversee the mineral supply chain, how they work, and the data collected that has improved due diligence during the reporting period.
- Describe your company's database and record-keeping system, including how it discloses all suppliers down to the mine of origin to downstream partners.
- Provide information on payments made to governments according to criteria set by the Extractive Industries Transparency Initiative (EITI).

Company Risk Assessment in the Supply Chain:

- Share a summary of the risk assessment while keeping business confidentiality and competition in mind.
- Summarize the methods used and findings from any on-the-ground assessments and explain how your company conducts its risk assessments.

Risk Management:

- Explain the steps taken to manage risks, including a summary of the risk mitigation strategy and any training provided, as well as the involvement of affected stakeholders.
- Report on how your company monitors and tracks its performance.

Audit:

- Provide a summary report of any audits that were conducted

FURTHER RESOURCES

European Union (2017) (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 laying down 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 <https://eur-lex.europa.eu/eli/reg/2017/821/oj/eng>

ICGLR (2019) Manual of the Regional Certification Mechanism (RCM) of the International Conference on the Great Lakes Region (ICGLR) https://icglr.org/wp-content/uploads/2024/03/ICGLR-Regional-Certification-Mechanism-Manual-2nd-Edition_Final.pdf?x55657

OECD (2016), OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition, OECD Publishing, Paris. <http://dx.doi.org/10.1787/9789264252479-en>

Responsible Minerals Initiative: <https://www.responsiblemineralsinitiative.org/>

U.S. Government Publishing Office (2010) Dodd-Frank Wall Street Reform and Consumer Protection Act, Public Law No. 111-203, 124 Stat. 1376, Section 1502, 15 U.S.C. § 78m(p).

TOOLS

MODEL SUPPLY CHAIN POLICY FOR A RESPONSIBLE GLOBAL SUPPLY CHAIN OF MINERALS FROM CONFLICT-AFFECTED AND HIGH-RISK AREAS

Disclaimer:

This is a generic supply chain policy that needs to be tailored to the specific company, operations and national context. The policy is based on the Model Supply Chain Policy for a Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas presented in the 3rd Edition of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas¹

Recognising that risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas, and recognising that we have the responsibility to respect human rights and not contribute to conflict, we commit to adopt, widely disseminate and incorporate in contracts and/or agreements with suppliers the following policy on responsible sourcing of minerals from conflict-affected and high-risk areas, as representing a common reference for conflict-sensitive sourcing practices and suppliers' risk awareness from the point of extraction until end user. We commit to refraining from any action which contributes to the financing of conflict and we commit to comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

Regarding serious abuses associated with the extraction, transport or trade of minerals:

1. While sourcing from, or operating in, conflict-affected and high-risk areas, we will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:
 - i. Any forms of torture, cruel, inhuman and degrading treatment;
 - ii. Any forms of forced or compulsory labor, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily
 - iii. Worst forms of child labor;
 - iv. Other gross human rights violations and abuses such as widespread sexual violence;
 - v. War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

Regarding risk management of serious abuses:

2. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined in paragraph 1.

Regarding direct or indirect support to non-state armed groups:

3. We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. "Direct or indirect support" to non-state armed groups through the extraction, transport, trade, handling or export of minerals includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:
 - i. Illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or
 - ii. Illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
 - iii. Illegally tax or extort intermediaries, export companies or international traders.

¹ OECD (2016), *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition*, OECD Publishing, Paris. <http://dx.doi.org/10.1787/9789264252479-en>

Regarding risk management of direct or indirect support to non-state armed groups:

4. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as defined in paragraph 3.

Regarding public or private security forces:

5. We agree to eliminate, in accordance with paragraph 10, direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.
6. We recognize that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.
7. Where we or any company in our supply chain contract public or private security forces, we commit to or we will require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights. In particular, we will support or take steps, to adopt screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.
8. We will support efforts, or take steps, to engage with central or local authorities, international organizations and civil society organizations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved.
9. We will support efforts, or take steps, to engage with local authorities, international organizations and civil society organizations to avoid or minimize the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites.

Regarding risk management of public or private security forces:

10. In accordance with the specific position of the company in the supply chain, we will immediately devise, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, as identified in paragraph 5, where we identify that such a reasonable risk exists. In such cases, we will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan. Where we identify a reasonable risk of activities inconsistent with paragraphs 8 and 9, we will respond in the same vein.

Regarding bribery and fraudulent misrepresentation of the origin of minerals:

11. We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.

Regarding money laundering:

12. We will support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along routes or at points where minerals are traded by upstream suppliers.

Regarding the payment of taxes, fees and royalties due to governments:

13. We will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments and, in accordance with the company's position in the supply chain, we commit to disclose such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI).

Regarding risk management of bribery and fraudulent misrepresentation of the origin of minerals, money-laundering and payment of taxes, fees and royalties to governments:

14. In accordance with the specific position of the company in the supply chain, we commit to engage with suppliers, central or local governmental authorities, international organizations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measurable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

TERMS OF REFERENCE FOR A SENIOR MANAGER RESPONSIBLE FOR COMPANY DUE DILIGENCE

Disclaimer:

This is a generic job description that needs to be tailored to the specific company, operations and national context

Job Title: Mining Due Diligence Manager - 3TG Exporters

Job Overview:

We are seeking an experienced and dedicated Mining Due Diligence Manager to oversee and ensure compliance with global standards for responsible mineral sourcing, particularly for 3TG (tin, tantalum, tungsten and gold) exporters in the African Great Lakes Region. This role involves managing supply chain risks related to 3TG minerals, conducting thorough due diligence risk assessments, working with internal and external stakeholders to develop and monitor mitigation measures, spearheading the implementation of traceability systems, and managing internal and external auditing processes. The ideal candidate will demonstrate a strong understanding of the regulatory frameworks, including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the ICGLR Regional Certification Mechanism (RCM), as well as with industry-wide responsible sourcing standards such as the Responsible Minerals Assurance Process (RMAP). The Mining Due Diligence Manager will play a critical role in safeguarding the integrity of the supply chain while engaging stakeholders and building their capacity.

Reporting Lines

The Mining Due Diligence Manager - 3TG Exporters will report to the Chief Operations Officer (COO) or another Senior-Level Manager within the company.

Key Responsibilities:

1. Due Diligence Management:

- Ensure adherence to global responsible sourcing standards, OECD Due Diligence Guidance and ICGLR RCM.
- Monitor and interpret legislative changes and regulatory requirements relevant to 3TG minerals.

2. Risk Assessment & Mitigation:

- Identify, evaluate and mitigate risks associated with the sourcing of 3TG minerals.
- Develop and implement risk management strategies to ensure a sustainable and ethical supply chain.
- Conduct comprehensive due diligence risk assessments of suppliers and operations in the Great Lakes Region.
- Assess compliance with responsible sourcing standards and identify areas for improvement.

3. Traceability System Design & Implementation:

- Develop and implement effective traceability systems to track the sourcing of 3TG minerals from mine to market.
- Collaborate with government industry schemes and third-party traceability providers to enhance traceability processes.
- Collaborate with government authorities to enhance traceability processes.

4. Policy & Procedure Development:

- Create and update policies and procedures related to mineral sourcing and due diligence based on best practices and evolving regulatory frameworks, including the OECD Due Diligence Guidance, the ICGLR RCM and the Responsible Minerals Assurance Process (RMAP).
- Train and support team members in the application of these policies and procedures.

5. Stakeholder Engagement:

- Facilitate communication and collaboration with various stakeholders, including government agencies, NGOs, industry partners and local communities.
- Lead capacity-building initiatives to improve stakeholder understanding and implementation of responsible sourcing practices.

6. Reporting & Documentation:

- Prepare and submit accurate reports on compliance status, risk assessments and due diligence activities to relevant stakeholders.
- Maintain thorough documentation of due diligence processes and findings for audit and review purposes.

Core Competencies:

- Strong knowledge of regional legal and regulatory frameworks on 3TG, in particular the ICGLR Regional Certification Mechanism and national legislation.
- Expertise in 3T(G) traceability systems and regulatory compliance frameworks.
- Practical experience in implementing OECD Due Diligence Guidance.
- Proven ability in risk assessment and mitigation strategies.
- Proficiency in policy and procedure development tailored to responsible mineral sourcing.
- Excellent stakeholder engagement skills and experience in capacity-building initiatives.

Qualifications:

- Bachelor's degree in Mining Engineering, Geology, Environmental Science, Business Administration, or a related field. A Master's degree is preferred.
- Minimum of 7-10 years of experience in mining due diligence, responsible sourcing, or a related field.
- Strong understanding of supply chain risks, particularly related to 3TG minerals.
- Excellent communication, negotiation, and interpersonal skills.
- Fluent in English or French; proficiency in local languages is an asset.
- Willingness to travel within the Great Lakes Region is necessary.

GRIEVANCE MECHANISM TRACKER

Case Number	Date	Summary	Type of Grievance	Grievance Raiser	Supplier / Business Partner	Action	Case updated	Case Status
<i>Unique Case Number for grievance</i>	<i>Date grievance was submitted</i>	<i>Short summary description of grievance raised</i>	<i>Link grievance to risks covered OECD Annex II</i>	<i>Name of grievance raiser (if available) or anonymous</i>	<i>Name of supplier or business partner to which grievance is related</i>	<i>Latest action of your company to address grievance allegations</i>	<i>Date on which case was last updated</i>	<i>Investigating</i> <i>Monitoring</i> <i>Closed</i> <i>Out of supply chain</i>

SUPPLY CHAIN MAPPING

Supply Chain Actor Name	Location	Type of Actor	Volume of Transactions	KYC Data Complete Yes / No	# of Incidents Involving this Actor	Relationship	Due Diligence Engagement Yes / No	Level of Influence High / Medium / Low
Name of mine site, cooperative, transporter, provider	Address	Trader, transporter, cooperative, miner, other (describe)	Volume of transactions (in kg) over the past 12 months and % of your overall transactions	Have you completed KYC information for this actor?	Over previous 12 months	Do you have a long-term or short-term relationship with this actor?	Are you engaging with this actor to improve due diligence (i.e. training, integrate policy into contracts)	How do you assess your leverage over this actor?

RISK MITIGATION MATRIX

Type of Risk	Description of Risk	Rating	Mitigation Measures	Agreed Upon by Affected Stakeholder	Timeframe	Comment	Status	Next Review Date
<i>Categories = risks covered by Annex II Model Policy</i>	<i>Description</i>	<i>Severe / Minor</i>	<i>Description</i>	<i>Yes / No</i>	<i>Date</i>	<i>Description</i>	<i>Complete / partially complete / open</i>	

KNOW YOUR COUNTERPART (KYC) TOOL

Know Your Counterpart (KYC) refers to the process by which companies obtain information about the identity of a business partner. The collection of KYC information is recommended by Annex II of the OECD Due Diligence Guidance. Companies should conduct KYC checks of all suppliers and identify any red flags as per Annex II, sanctions listing and politically exposed person criteria. KYC forms should be provided to auditors within the framework of ICGLR Third-Party Audits.

What suppliers do I need to consider?

- Traders, middlemen, negociants, aggregators;
- Logistic service providers (transport companies, warehouses, custom or trade facilitators);
- Extraction and processing service providers;
- Security service providers.

What are politically exposed persons?

Politically exposed persons include any company or mine site owner who is at the same time:

- A member of public security forces (army, police);
- A member of national or provincial parliament or assembly;
- A high-ranking member of a political party;
- A member of criminal networks or non-state armed groups;
- A staff member of a ministry or government agency with potential conflict of interest in the mining sector.

What sanctions listings to I need to consider?

- UN sanctions lists;
- OFAC Specially Designated Nationals Lists;
- World-Check search;
- EU Sanctions and Retrictive Measures;
- United Kingdom Office of Financial Sanctions Implementation.

There are a number of free-to-use sanction tools for sanctions and PEP scanning:

<https://www.opensanctions.org/>

<https://lexascan.com/>

<https://dilisense.com/en>

Assessment Overview

Names and titles of assessment team participants	
Company of assessment team	
Third party (yes / no)	
Date assessment was conducted	
Assessment conducted for...	

Company Information

Legal name of the company and subsidiaries:	
Registered address:	
Business address:	
Tax identification number:	
Certificate of incorporation	
Address(es) for additional facilities: (if any)	
Phone number	
Company website	
E-mail	
Name(s) of official representative(s):	
Names of the board of directors:	
Type of operations and areas of activity	
Trader	☐
Transporter	☐
Extraction, and processing service providers	☐
Security service providers	☐
Others (please describe)	☐
Proof of payment of taxes, etc.	
Sanctions Check conducted (y/n)	

Evidence of annex II risks

Are there any risk of serious abuses associated with the extraction, transport or trade of minerals? How have these risks been identified?	
Do any of your suppliers employ children <18 years?	
Have there been any reports of forced and involuntary labour?	
Have there been any reports of cruel, in-human or degrading treatment with your suppliers?	
Have there been any reports of gender-based and sexual violence?	

Are there any risk of direct or indirect support to non-state armed groups?
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Are armed groups present in or near mine sites or along transport routes?	
Are your suppliers required to make payments to non-state armed groups?	
Are any of the materials given or sold to surrounding armed groups?	

Are there risk related to public and private security forces?	
Do your suppliers contract public or private security forces to provide security	
Have there been any incidents related to public or private security forces? How have these incidents been resolved?	
How are security forces vetted?	
How are security forces paid for their services? Are there records of these payments	

Are there any risk of bribery, money laundering and fraudulent misrepresentation of the origin of minerals?	
Have there been any reports / allegations of theft / smuggling of material?	
Have you received any unlabelled or falsely labelled shipments?	
Have you noticed any unusual production by supplier? (i.e. is production reasonable given the number of individual employed, were there any sudden changes in production)	

Owner Information

For each identified company owner complete the following.

Each identified owner needs to be checked against sanctions imposed by:

Owner / Beneficial Owner #1

Name:	
Position or affiliation with company	
Date of Birth	
Nationality	
ID Number	
ID verified (y/n)	
Ownership %	
Sanctions Check conducted (y/n)	
Politically Exposed Person (PEP)	

Owner / Beneficial Owner #2

Name:	
Position or affiliation with company	
Date of Birth	
Nationality	

ID Number	
ID verified (y/n)	
Ownership %	
Sanctions Check conducted (y/n)	
Evidence of annex II risks	

Owner / Beneficial Owner #3

Name:	
Position or affiliation with company	
Date of Birth	
Nationality	
ID Number	
ID verified (y/n)	
Ownership %	
Sanctions Check conducted (y/n)	
Politically Exposed Person (PEP)	

On-the-Ground Assessment Tool

Assessment Overview

Names and titles of assessment team participants	
Company of assessment team	
Third party (yes / no)	
Date of the assessment	

Overall Assessment Conclusions

Were any Annex II risks identified (yes/no)	
If yes, which risks were identified?	
Were any serious risks found that require suspending business relationships?	
Proposed actions for risk mitigation	
Date of the next assessment	

Assessment Methodology

During the assessment, we spoke to the following (example: management, workers, syndicate leaders, security personnel, community leaders, community members, police, etc.):	
Stakeholder name and title	Comments

During the assessment, we observed the following areas in the supply chain (e.g., pit, storage units, management offices, community, transportation routes, etc.):

During the assessment, we reviewed the following documentation (policies, procedures, employee records, permits, grievances, material records, etc.):

General mine-site information

Mine site name:	
GPS coordinates:	
Province/District:	
Owner's name:	
Materials mined:	
Operations manager's name (if applicable):	
Mine site owner's name (if different from operator):	
Primary buyer of minerals:	
Last ICGLR RCM mine site validation results:	
Was a copy of the report provided? (yes/no)	
Legal structure of the mining area (e.g., cooperative, concession, etc.):	
Who holds the mining permit, if any?	
Permit type:	
Permit number:	
Issue date:	
Expiry date:	
Mining site description (e.g., open pit, underground, etc.):	
Equipment used in mining:	
Typical daily production per miner (kg):	
Monthly production capacity (tons) at inspection:	
Annual production (tons; specify for each mineral; kg for gold):	
Is this information recorded? (yes/no)	
Total number of workers (miners, diggers, etc.):	
Are records available for each worker? (yes/no)	
Are employees part of a union, cooperative, or similar group? (yes/no)	
Payment method for workers (e.g., bank transfer, cash):	
Payment frequency (e.g., daily, weekly, monthly):	
Who pays the workers?	

Serious abuses associated with the extraction, transport or trade of minerals

Evidence to review: 1) Worker records, 2) grievances and complaints records, 3 interviews on and surrounding mine-site, 4) on-site observations, 5) police reports, 6) NGO report, 7) policies,

Is there a process to verify workers' ages? (yes/no)	
Are there records available to confirm workers' ages? (yes/no)	
Are children (defined by local law or as those under 15 years) visibly working at the mine site? (yes/no)	
If yes, what activities are they involved in?	
What are the typical working hours or shift schedules for miners?	
What is the turnover rate for miners?	
What types of payments do miners make?	
How are these payments made?	
Have there been any reports of cruel, inhumane, or degrading treatment? (yes/no)	
Who pays for the equipment used on site?	
Are there any women working at the mine site? (yes/no)	
Have there been any reports of gender-based or sexual violence? (yes/no)	

Direct or indirect support to non-state armed groups?

Evidence to review: 1) grievances and complaints records, 2) interviews on and surrounding mine-site, 4) on-site observations, 5) police reports, 6) NGO reports,

How is access to the mining area managed?	
What other people are on site besides workers (e.g., security, military, community leaders, religious leaders)?	
Are there armed groups near or at the mine site? (yes/no)	
Have there been any incidents involving armed groups? (yes/no)	
Are materials given or sold to nearby armed groups? (yes/no)	
Are miners asked to contribute resources or money? (yes/no)	
What happens if a miner does not contribute?	

Support to public and private security forces?

Evidence to review: 1) grievances and complaints records, 2) interviews on and surrounding mine-site, 4) on-site observations, 5) police reports, 6) NGO reports, 7) contracts

Does the mining operation hire security for its activities? (yes/no)	
Are the security forces public or private?	
What is the role of the security forces?	

How are the security forces vetted (e.g., background checks, reviews with local or international authorities)?	
Are relationships with public and private security forces, if any, formalized through contracts?	
Are there receipts for payments made?	
How does the mining operation oversee the security forces' activities?	
Are there any tensions or issues between the community, miners, and security forces? (yes/no)	
Have there been any incidents involving security forces? (yes/no)	

Bribery, money laundering and fraudulent misrepresentation of the origin of minerals?

Evidence to review: 1) grievances and complaints records, 2) interviews on and surrounding mine-site, 3) on-site observations, 4) tax documents, export documents, sales records, etc.

What taxes are legally required to be paid?	
What taxes have actually been paid?	
Is there documentation to verify the taxes paid? (yes/no)	
Have there been any reports or allegations of theft or smuggling? (yes/no)	
Does the mine use an accredited chain of custody system (e.g., ITSCI, Better Sourcing, Minespider)? (yes/no)	
Are minerals stored in tagged bags? (yes/no)	
How are the tagged bags handled and stored?	
Have you seen any unlabelled or falsely labelled shipments? (yes/no)	
Have you noticed any unusual production levels from suppliers (e.g., production not matching the number of workers or sudden changes)? (yes/no)	
Where does the material go after leaving the mine site?	
Have there been instances where law enforcement seized material? (yes/no)	



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