INTERNATIONAL CONFERENCE ON THE GREAT LAKES REGION

CONFERENCE INTERNATIONALE SUR LA REGION DES GRANDS LACS

EXPORTER DUE DILIGENCE REPORT TEMPLATE

german cooperation
DEUTSCHE ZUSAMMENARBEIT

Kingdom of the Netherlands

Co-funded by the European Union

Implemented by
giz Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH

February 2025

About this Document

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.

COMPANY INFORMATION

Exporter Name	
Exporter Country, Province and City	
Exporter Licence Number	
Materials exported:	
Time period covered by this report	

Describe the main economic activities your company is engaged in.

Write here...

Describe the main sources of origin of the minerals you trade.

Explanation

- *How many suppliers do you source from?*
- *Which geographic areas do you source from?*
- *Are any of these areas to be considered conflict-affected or high-risk areas?*
- *Have there been any changes in your suppliers during the period under review?*

Note: You are not required to specifically name individual mine sites or disclose supplier relationships.

Write here...

OECD DUE DILIGENCE STEP 1:

COMPANIES ESTABLISH STRONG COMPANY MANAGEMENT SYSTEMS TO SUPPORT SUPPLY CHAIN DUE DILIGENCE.

Provide a written statement of your company's commitment to follow Annex II of the OECD Guidance.

Write here...

Describe the management structure to oversee due diligence including roles and responsibilities.

Write here...

Provide the title and contact for the person(s) responsible for overseeing due diligence.

Write here...

Describe how you build your staff's capacity to implement due diligence.

Write here...

Describe how your company engages with suppliers (mine operators, traders) to improve due diligence.

Explanation: Examples of engagement may include training, regular visits, contractual agreements on due diligence, feedback on on-the ground assessments.

Write here...

Describe your company's procedures to control the origin of sourced materials. How is the movement of shipments controlled? How is your company implementing chain-of-custody and traceability?

Write here...

Describe how your company's records and documents on sourced materials are stored.

Write here...

Describe how your company is implementing grievances mechanisms and how information from grievance mechanisms is integrated into the due diligence process.

Write here...

Describe how your company is engaging with government authorities, communities and civil society and how this information is integrated into the due diligence process.

Write here...

OECD DUE DILIGENCE STEP 2:

IDENTIFY AND ASSESS RISKS IN THE SUPPLY CHAIN

Describe how your company identifies and prioritizes risks.

Write here...

Describe the sources of information your company uses to identify and prioritize risks.

Write here...

Describe your Know Your Counterpart (KYC) process.

Write here...

Have the mine sites your company sources from been inspected by a competent national authority in accordance with the ICGLR Regional Certification Mechanism?

Write here...

Describe the methodology and information yielded through on-the-ground risk assessments (i.e. visits to mine-sites, visits).

Write here...

Describe any risks that were identified as set out in the OECD *Annex II* risks:

Has your company identified any risk of serious abuses associated with the extraction, transport or trade of minerals? How have these risks been identified?

Explanation:

- *Does 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, inhuman or degrading treatment with your suppliers?*
- *Have there been any reports of gender-based and sexual violence?*

Write here...

Has your company identified any risk of direct or indirect support to non-state armed groups?

Explanation:

- *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 you or any of your suppliers giving or selling materials (i.e. mineral concentrates) to non-state armed groups?*
-

Write here...

Has your company identified any risk related to public and private security forces?

Explanation:

- *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?*

Write here...

Has your company identified any risk of bribery, money laundering or fraudulent misrepresentation of the origin of minerals?

Explanation:

- *Have there been any reports/allegations of theft/smuggling of material?*
- *Have you received any unlabelled or falsely labelled shipments?*
- *Are suppliers required to make payments to political parties or public authorities in contravention of laws?*
- *Are suppliers licensed to operate and pay their taxes in accordance with national laws?*
- *Have you noticed any unusual production by your suppliers? (e.g., is production reasonable given the number of individual employed, were there any sudden changes in site productivity, etc.)*

Write here...

OECD DUE DILIGENCE STEP 3:

DESIGN AND IMPLEMENT A STRATEGY TO RESPOND TO IDENTIFIED RISKS

Describe how you respond to any of the risks identified above.

Explanation:

- *Your company should immediately suspend and discontinue engagement with any party committing serious human rights abuses or providing direct or indirect support to non-state armed groups.*
- *For other risks, such as bribery, money laundering and fraudulent misrepresentation of the origin of minerals, your company may continue to engage and implement a risk mitigation plan.*

Write here...

Describe any improvement plans you have made to mitigate risks and how the implementation of the plan is monitored.

Write here...

Describe any changes your company has made to its management systems, such as internal control, internal capacities, or chain of custody.

Write here...

Describe the effectiveness of the responses your company has implemented.

Write here...

Describe how you involve your suppliers and affected stakeholders (local communities, NGOs, customers) in risk mitigation.

Write here...

Describe how you engage with the government in risk mitigation.

Write here...

RCM Exporter Audit: CARRY OUT INDEPENDENT THIRD-PARTY AUDIT of Exporters

Provide a summary statement of the most recent ICGLR Third-Party Audit.

Date of last ICGLR TPA	
Time period covered by TPA	
Audit firm	
URL to audit summary report	
Exporter Status	

Write here...

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