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## BETTER MINING ALIGNMENT ASSESSMENT FOR RMI UM RECOGNITION PROCESS

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## OBJECTIVE

Better Mining is an upstream mechanism (UM) and improvement program. It provides digital product traceability and independent, third-party monitoring on artisanal and small-scale mining (ASM) sites to generate incidents and risk data in alignment with global responsible sourcing requirements. This data is transformed into Corrective Action Plans (CAPs) with the intent to support risk management and drive ASM site improvement. Better Mining is currently a Level 1 recognized Upstream Mechanism (UM) for tantalum, tin and tungsten (3Ts), as outlined in the Responsible Minerals Initiative (RMI) Recognition Process document. Better Mining needs to undergo a new assessment in order to renew its accreditation as a Level 1 recognized Upstream Mechanism, as per the updated RMI Recognition Process (December 2022). ARCHE has been requested to carry out the Independent Alignment Assessment of Better Mining using OECD [Alignment Assessment Methodology](#) and [Alignment Assessment Tool](#).

This assessment consists of a desk-based and on-site verification of the implementation of the Better Mining UM in order for Better Mining to receive a Level 1: Full Recognition - Standard and Implementation accreditation from the RMI.

This Alignment Assessment has been conducted independently of the OECD. The OECD provided limited feedback related to how the Alignment Assessment tool was presented, but did not conduct any comprehensive review of the findings of the Assessment.

## SCOPE

### **1. The entity in scope is Better Mining.**

The assessment scope is limited to the implementation of Better Mining's standards, policies and procedures where there is a Better Mining supported supply chain.

### **2. The standard for the assessment is the RMI UM Recognition Process.**

The RMI UM Recognition Process indicates that for a Level 1 recognition, Better Mining will have to demonstrate alignment with the OECD Due Diligence Guidance, using the OECD's Alignment Assessment Methodology and Alignment Assessment Tool.

### **3. The activities in scope are the application of Better Mining's processes.**

The activities in scope are the application of Better Mining's processes in the 3T chain from One Trader / Exporter and Two sites with ASM (2 sites are operated by company Trinity Metals).

- The assessment required a minimum of three months implementation of the Better Mining assurance services on the evaluated supply chain.
- Location details of the two sites operating in Rwanda:
  - Site 1: ETI Nyakabingo
    - Mineral: tungsten

- Location: About 20km northwest of Kigali
- GPS: -1.86333,29.97778
- Site 2: Rutongo
  - Mineral: tin
  - Location: About 25km north of Kigali
  - GPS: -1.816447951915893, 30.059901977948414
- Trinity Metals is the owner company of both operations: <https://trinity-metals.com/>

During the alignment assessment the assessor was informed by RCS Global Group Better Mining (BM) that they had just signed a contract with a client in DRC, however at the time of the implementation assessment BM was not operational in DRC. It was suggested to BM management that once operations generate sufficient evidence for an assessment, an alignment assessment for implementation in DRC should be carried out.

#### 4. Assessment activities

##### a. Assessment of Better Mining implementation

- i. Desk-based review of Better Mining’s written policies and procedures, and,
- ii. Desk-based review of documentation resulting from implementation (activity reports, risk monitoring reports, etc.), and,
- iii. Interviews with Better Mining’s management and on-site teams, and,
- iv. Interviews with workers at the mine sites, and,
- v. Interviews with exporter management staff,
- vi. Site visit of mine site, and,
- vii. Site visit of exporter facilities
- viii. Interview with receiving smelter

b. Assessment period: January 2022 - August 2023, Assessment duration: 19 May – 31 August 2023.

The Assessment includes the following deliverables:

1. Completed OECD Alignment Assessment Tool
2. Written Assessment Report

## ASSESSMENT METHODOLOGY

A structured assessment was undertaken against detailed criteria that are set out in the Assessment Tool. The Alignment Assessment criteria were each individually rated by the evaluator against two aspects:

a) Standards: The extent to which the recommendations from the OECD Guidance have been incorporated into the programme’s policies, standards, procedures and operating requirements set out for companies.

b) Implementation: The extent to which it can be reasonably concluded that the criterion is implemented by the programme, including by deploying the necessary measures to ensure compliance and securing adequate remedial action in cases where companies participating in the programme and/or auditors do not adhere to the programme's policies and standards (when applicable to them).

Assessment in both respects (standards and implementation) was based on the evidence gathered during all assessment activities.

In addition to those two categories, a governance assessment was undertaken for the assessed programme. The purpose of this was to enable an evaluation of the extent to which the intentions, spirit and principles of the OECD Guidance have been incorporated into the ways in which Better Mining is managed. The governance assessment's conclusions however do not affect the evaluation of a program's alignment with the OECD Guidance recommendations because the OECD Guidance does not include program governance recommendations.

Programme was assessed against the aspects of the OECD Guidance for which the programme has been designed to carry out. Better Mining provides companies with support with mineral traceability from mine site to smelter, risk assessments and risk mitigation on the mining sites.

All these activities were included in the assessment scope.

As Better Mining does not provide audits of smelters or refiners, assessor considered Step 4 of the Assessment Tool to be not applicable (N/A). Evaluator considered what due diligence the programme claims to cover and at what segment in the supply chain the programme is active.

Assessor engaged with the subjects of the assessment and communicated the purpose of the assessment and how the results will be used. Better Mining provided relevant information, facilitated engagement with programme participants and was available to provide comments and factual corrections as the evaluation progressed.

Project timetable was developed and agreed with Better Mining in order to be able to facilitate access to the programme participants.

The Alignment Assessment started with a desk-based review of relevant documentation obtained from Better Mining. During the documentation review the evaluator analysed the detailed requirements that the programmes sets for itself, for companies that are part of the programme and specifically with respect to the five-step due diligence framework in the OECD Guidance. In addition relevant and credible documentary evidence of how the criteria has been implemented by the programme and its participants was considered, including information available from additional sources. Programme requirements were compared against the relevant detailed recommendations of the OECD Guidance.

## **1. Desk-Based Review of Standards and Policies**

The Alignment Assessment desk-based review included the following Better Mining documents:

- Better Mining Upstream Mechanism Approach and Systems Manual V7 (May 29, 2023)
- Better Mining Critical Breach Procedure (June 14, 2023)

These are the primary policy and procedural documents that describe the requirements of the Better Mining program. Programme requirements were compared against the relevant detailed recommendations of the OECD Guidance using the OECD Assessment Tool. Other documents reviewed alongside the Manual and Procedure included:

- BM Incident and Risk Directory
- BM Recommendations for Grievance Mechanisms
- BM Risk Management Procedure - Mitigation Action Directory
- BM Risk Management Procedure
- BM Monthly CAP Procedure
- RCS Global Group BM OECD Annual Due Diligence Report Template for Better Mining Members
- BM Conformance Statement
- BM Due Diligence Documents Checklist Exporter
- BM KYC Questionnaire for Local Exporters
- BM KYC Questionnaire for Mining Operators
- BM Model supply chain policy
- BM SCE Questionnaire - Cooperative \_ Mine Site Assessment
- BM SCE Questionnaire - Exporter Assessment
- BM SCE Report Template
- BM Traceability Configuration Better Mining Risk Management Platform - User Guide

Based on the assessment the following ratings were assigned per the applicable Policy /Standard section:

*Fully Aligned:*

The criterion is fully and explicitly addressed in the programme's policies, standards, procedures, or other formal documentation.

*Partially Aligned:*

The criterion is only partially addressed in the programme's policies, standards, procedures, or other formal documentation; and / or the criterion is addressed but informally or inconsistently.

*Not Aligned:*

The criterion is not addressed in the programme's policies, standards, procedures, or other formal documentation.

An initial review was completed, the assessor then asked for additional clarifications from the Better Mining Program Manager. Once provided, the assessor concluded that all Standards and Policies are Fully aligned with the OECD requirements.

## 2. Implementation Assessment

Stakeholders considered for the implementation assessment were following:

- Better Mining;
- Mine site operators;
- Mine workers;
- Smelters

Implementation Assessment was conducted between August 28 – 31, 2023 at 2 (out of 2 total) operations where Better Mining program was operational at the time of the assessment. Both locations were in Rwanda. The assessment team visited the exporter, mine sites and the local Better Mining office and conducted interviews with relevant parties present and reviewed on-site documentation.

### Site visits

Assessment team visited all the operations at the mining site, including underground mine tunnels and other operation areas (washing, concentration etc.).

During site visits evidence was obtained through visual observation, documentation review, and interviews with relevant stakeholders.

### Visual observations:

It was observed that Better Mining team is physically present at all times of the operations and conducts continuous monitoring. Better Mining tagging agents are present and their activities are to ensure material integrity is remained. No risk of mineral contamination identified. No apparent Annex II risks observed during the field visits.

### Interviews

As a source of information auditor used interviews with different stakeholders. Below is a detailed number of interviews conducted.

Interviewed parties	Number of interviewees
Miners	12
Focus group with miners (at washing point)	5
Mine operator representatives	4
Better Mining Field agents	4
Better Mining tagging agents	3
Exporter representatives	6
Better Mining Administration	5
Smelter representative	1



### Smelters

In addition to interview with receiving smelter, information, obtained from smelters through the Smelter Step 4 audits, conducted by assessor and which were utilising Better Mining traceability system and risk management platform was considered as an input for this assessment.

Using the Alignment Assessment Tool, implementation was reviewed and assessed one of the following ratings:

#### *Fully Aligned:*

There is sufficient evidence, based upon the assessment activities undertaken, to reasonably conclude that the criterion is implemented by the programme.

#### *Partially Aligned:*

There is sufficient evidence, based upon the assessment activities undertaken, to reasonably conclude that the criterion is partially implemented by the programme; including by undertaking some but not fully adequate measures to implement the programme.

#### *Not Aligned:*

There is sufficient evidence, based upon the assessment activities undertaken, to reasonably conclude that the criterion is not implemented by the programme.

An initial implementation review was completed, the assessor then asked for additional clarifications from the Better Mining Program Manager. Once provided, the assessor concluded that Implementation is Fully aligned with the OECD requirements.

### **3. Governance**

Programme Governance review was conducted. Based on a fact that Better Mining is not an Institutional Mechanism nor an Industry Initiative and does not perform audits of smelters or refiners, review of Program Governance and Management had a number of items that were considered by assessor to be not applicable. Summary of the Governance assessment is provided on pp. 13-14 of this report.

## **BETTER MINING PROGRAM SPECIFIC RESULTS**

### **SECTION A**

#### **Overarching due diligence principles within Programme standards and guidance**

**Assessment activities carried out provided reasonable assurance that:**

- Better Mining explicitly recognises due diligence as an ongoing process to be undertaken by companies.
- Better Mining expects companies to proactively carry out due diligence and to react to changes of circumstances and risks in the supply chain.
- Determination of product conformity is based on the companies' due diligence practices with the OECD due diligence guidance.
- Better Mining expects companies to progressively improve their due diligence activities and risk management performance over time.
- Better Mining encourages companies to source responsibly from conflict-affected or high-risk areas and, where relevant, from artisanal and small-scale mineral producers.
- Better Mining expects companies' due diligence activities to be guided by their own risk assessments.
- Better Mining expects companies' due diligence activities to consider at least all risks covered in Annex II (serious abuses associated with the extraction, transport or trade of minerals, direct or indirect support to non-state armed groups, public or private security forces, bribery and fraudulent misrepresentation of the origin of minerals, money laundering, payment of taxes, fees and royalties due to governments and bribery).
- Better Mining expects that the measures that a company takes to conduct due diligence should be commensurate to the severity and likelihood of the identified risks.
- Better Mining includes in the definition of red flags considerations of location of mineral origin and transit, supplier characteristics and trade-related circumstances.
- Better Mining expects that due diligence activities on red-flagged supply chains should involve on-the-ground assessments, to be undertaken by upstream companies. Upstream companies may cooperate through joint initiatives, however they retain individual responsibility for their due diligence and should ensure that all joint work duly takes into consideration circumstances specific to the individual company.
- Better Mining explicitly recognizes that companies should use good faith and reasonable efforts in their due diligence, taking into account factors such as the size of the enterprise, the location of the activities, the situation in a particular country, the sector and nature of the products or services involved.
- Responsibility for determining the actions that a company undertakes in response to identified risks rests with the company's management.
- Better Mining states clearly that the use of Industry Programmes, Institutionalised Mechanisms or multi-stakeholder initiatives does not release companies from being responsible for the scope and quality of due diligence in their own supply chains and for reporting on the due diligence that is undertaken in their supply chains.
- Due diligence should be global in scope.

No gaps identified in SECTION A.



## SECTION B

### Alignment of Programme requirements with the five-step due diligence framework

*(This section addresses the Requirements which Better Mining sets for companies covered by the Programme.)*

#### Step 1: Establish strong company management systems

**Assessment activities carried out provided reasonable assurance that Better Mining does expect companies under the programme to:**

- Adopt, and clearly communicate to suppliers and the public, a policy, applicable to the company and its suppliers, providing the principles and standards for identifying and managing the risks in the supply chain of minerals potentially from conflict-affected or high risk areas, against which the company will assess itself and the activities and relationships of suppliers.
- Ensure that the supply chain policy is consistent with the standards provided in Annex II of the Guidance.
- Within the supply chain policy, set out a clear and coherent management process for risk management. Commit to the due diligence steps as described in Annex I and, where relevant, the Supplement.
- Structure internal management to support supply chain due diligence and assign authority and responsibility to senior staff with the necessary competence, knowledge and experience to oversee supply chain due diligence.
- Ensure that sufficient resources are made available to support the operation and monitoring of supply chain due diligence processes, taking into account company size, location and circumstances.
- Establish the necessary organisational structure and communication processes that will ensure critical information about supply chain due diligence, including the company's policy, reaches relevant employees and suppliers.
- Assist suppliers in building due diligence capacities and provide training as appropriate to employees and suppliers on the policy and its practical application.
- Ensure internal accountability with respect to the implementation of the supply chain due diligence process.
- Establish a system of controls and transparency over the mineral supply chain, including a chain of custody or traceability system or the identification of upstream actors in the supply chain. Create and maintain internal documentation and records of supply chain due diligence processes, findings and resulting decisions.
- Support the implementation of the principles and criteria of the Extractive Industry Transparency Initiative (EITI).
- For local mineral exporters: Collect and disclose information on taxes/payments and details of mineral origin and transportation as set out in the 3T Supplement (taking account of business confidentiality and competitive concerns).
- For all upstream companies: For minerals from a red-flagged location generate, on a disaggregated basis, information on taxes/payments and details of mineral origin and transportation as set out in the 3T Supplement. Make this information available to downstream purchasers and relevant Institutionalised Mechanisms (information can be disclosed to and held

by an Institutionalised Mechanism with a mandate to collect and process information on minerals from conflict-affected and high risk areas).

- Avoid cash transactions where practicable and ensure cash transactions are supported by verifiable information.
- Maintain due diligence information for a minimum of five years, preferably on a computerised database. For 3T supply chains, smelters/refiners and downstream purchasers should also make due diligence information available to downstream purchasers and relevant Institutionalised Mechanisms.
- Aim to establish long-term relationships with suppliers in order to build responsible sourcing relationships with them.
- Communicate to suppliers the company's expectation that suppliers will undertake mineral supply chain due diligence and risk management consistent with the standards defined in Annex II of the Guidance.
- Seek to support and build capacities of suppliers to improve risk management performance and comply with the company's supply chain policy.
- Commit to designing measurable improvement plans with suppliers, involving external stakeholders such as government or civil society as appropriate.
- Establish a grievance mechanism that enables any affected stakeholders or whistle-blowers to voice concerns regarding the circumstances of extraction, trade, handling and export of minerals. The grievance mechanism may be provided directly, through collaboration with other companies, or through an industry programme or institutionalised mechanism.

Gaps identified in Step 1 of Section B:
<ul style="list-style-type: none"> <li>• Sampled policies of participants do not address all the risks included in the Sample policy of OECD DDG.</li> </ul>
<ul style="list-style-type: none"> <li>• As it is not ensured, that all participating companies have a Responsible Sourcing Policy, which complies with the latest version of the OECD DDG, it is also not ensured, that the supply chain policy sets out a clear and coherent management process for risk management. Also commits to the due diligence steps as described in Annex I and, where relevant, the Supplement.</li> </ul>
These findings resulted, that 2 criteria in the scope were considered to be PARTIALLY ALIGNED.

## Step 2: Identify and assess risks in the supply chain

Assessment activities carried out provided reasonable assurance that Better Mining does expect companies under the programme to:

- Identify risks in supply chains taking into consideration that the scope of the risk assessment will depend on the position in the supply chain.
- Ensure that the scope of risk identification and assessment extends to all of the risks set out in Annex II and the recommendations in the Due Diligence Guidance.

- Identify and assess whether the locations of mineral origin and transit, the nature of suppliers or the circumstances within the supply chain may trigger 'red flags' as defined by their policy and the relevant Supplement of the Guidance.
- Map the factual circumstances of the supply chain, including the origin of minerals and the activities/relationships of suppliers.
- Undertake an in-depth review of the context of all red-flagged locations and the due diligence practices of any red-flagged suppliers, covering all of the aspects referenced in the Supplements.
- Undertake on-the-ground assessments, performed by suitably qualified and independent assessors, of red-flagged sources of mined minerals. Provide this information to downstream companies in the supply chain.
- Assess risks against the requirements of the company's supply chain policy (consistent with Annex II), the relevant Supplement of the Guidance, national laws and other relevant legal instruments. Any reasonable inconsistency between these requirements and the information obtained through due diligence should constitute a risk.

No gaps identified in Step 2 of Section B.

### Step 3: Design and implement a strategy to respond to identified risks

**Assessment activities carried out provided reasonable assurance that Better Mining does expect companies under the programme to:**

- Report findings of risk assessment to designated senior management, outlining the information gathered and the actual and potential risks identified in the supply chain risk assessment.
- Manage the identified risks by either: (i) continuing to trade but with measurable risk mitigation, (ii) temporarily suspending trade while mitigation is put in place, or (iii) ceasing trade with the relevant supplier. In doing so have regard to the specific recommendations of the relevant Supplements.
- Measurable risk mitigation should result in significant and measurable improvement towards eliminating the identified risks, other than serious abuses, within six months from the adoption of the risk management plan. If there is no such measurable improvement within six months, companies should suspend or discontinue engagement with the supplier for a minimum of three months.
- Build and/or exercise leverage over the actors in the supply chain who can most effectively and most directly prevent and mitigate the risks of adverse impacts.
- Consult with suppliers and affected stakeholders to agree on the strategy for measurable risk mitigation in the risk management plan.
- Publish the supply chain risk assessment and the supply chain management plan, with due regard to business confidentiality and other competitive concerns, and make them available to external stakeholders as set out in the relevant Supplement.
- Implement the risk management plan, monitor risk mitigation and report performance to designated senior management, and consider suspending or discontinuing trade with a supplier after failed attempts at mitigation.

- Implement, monitor and track performance of risk mitigation in cooperation/consultation with local and central authorities and other relevant stakeholders. Consider establishing or supporting community-based networks to monitor risk mitigation.
- Maintain ongoing risk monitoring, evaluate the effectiveness of risk mitigation efforts and undertake additional fact and risk assessments as required, for example following changes to the supply chain.

No gaps identified in Step 3 of Section B.

#### **Step 4: Carry out independent third party audit of supply chain due diligence at identified points in the supply chain**

NA – Better Mining does not have a audit program as defined by OECD Due Diligence Step 4. Better Mining program supports from the mine to the trader/smelter.

#### **Step 5: Report on supply chain due diligence**

**Assessment activities carried out provided reasonable assurance that Better Mining does expect companies under the programme to:**

- Annually report, or integrate into annual sustainability or corporate responsibility reports, information on supply chain due diligence.
- The report should describe the company’s management systems, the methodology and results of the risk assessment and the steps taken to manage risks, consistent with the specific content described in the Guidance. The report should be published.

No gaps identified in Step 5 of Section B.

## **SECTION C**

Specific responsibilities of Programmes

#### **Step 1: Establish strong company management systems**

**Assessment emphasized on whether Better Mining does:**

- Undertake due diligence on the ownership (including beneficial ownership) and corporate structure of refiners/smelters seeking accreditation/certification or membership status under the Programme.
- Provide training to companies and/or their suppliers on due diligence management systems and processes.

- Provide or facilitate access to a grievance mechanism that allows any impacted stakeholder to voice concerns relating to the extraction and supply chain activities of the relevant mineral(s) covered by the Programme.

Gaps identified in Step 1 of Section C:
<ul style="list-style-type: none"> <li>• KYC frequency on participants is not defined. (Latest KYC for participants conducted in 2017).</li> </ul>
<ul style="list-style-type: none"> <li>• Ultimate Beneficial Ownership is not identified – Beneficial ownership of participants does not reveal the physical people behind the companies.</li> </ul>
These findings resulted, that 1 criteria in the scope was considered to be PARTIALLY ALIGNED

## Step 2: Identify and assess risks in the supply chain

### Assessment emphasized on whether Better Mining does:

- Support companies sourcing minerals from red flagged operations in establishing on-the-ground assessment teams with appropriate capabilities and access rights as set out in the Guidance.

No gaps identified in Step 2 of Section C.
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## Step 3: Design and implement a strategy to respond to identified risks

N/A – this section of the workbook is addressing Gold Only requirements.

## Step 4: Carry out independent third party audit of supply chain due diligence at identified points in the supply chain

NA – Better Mining Does not perform audits as defined by the OECD Supplements. No identified points in the supply chain.

### Programme Governance review:

#### Better Mining Governance Review provided reasonable assurance that:

- The Programme has involved external stakeholders (e.g. civil society, regulators) in the development and oversight of the due diligence, reporting and auditing requirements, including in risk mitigation efforts as set out in Step 3 of the Guidance.

- The Programme regularly participates in relevant public forums (whether through media or events such as conferences) where it provides information about its responsible supply chain programme, including the risks it identifies in the supply chains of companies within the Programme and on mitigation strategies that are being effectively deployed to address these risks.
- The Programme has established a functioning and accessible grievance mechanism that enables stakeholders to raise concerns relating to the Programme itself (i.e. not just issues in companies' supply chains).
- The Programme has a mechanism for monitoring, tracking and sharing information – including between programmes, if appropriate – on incidents or emerging risks identified from company's risk assessments and other relevant sources that could create red flags for companies participating in the Programme.
- The Programme has an effective process for communicating details of incidents or emerging risks to companies, auditors and other relevant stakeholders in a timely manner in order to support companies in performing their own supply chain due diligence activities.
- The Programme has a process for regular review and, as necessary, updating of its guidance and requirements for companies and auditors.
- The Programme has defined its expectations for the timeliness and completion of corrective actions or non-conformance findings that are identified through a company's audit against the Programme requirements.
- The Programme has a regular communications programme through which it informs companies and other relevant stakeholders of relevant developments in its responsible sourcing scheme, including updates to standards or guidance documents.
- The Programme has procedures in place to follow up and address grievances brought to it in a timely manner (whether relating to supply chain issues or the Programme itself).
- All organisations that are considered members of the Programme (regardless of whether they are subject to audit) are required by the Programme to commit to implementing the OECD Due Diligence Guidance.
- Programme communications (whether private with individual companies or public) demonstrate that the Programme does not have unrealistic expectations in relation to the due diligence activities and performance of companies within the Programme (e.g. an acceptance of failings/challenges following good faith and reasonable efforts, provided there is commitment to improve within an agreed timeframe).

IMPROVEMENT OPPORTUNITY IDENTIFIED
Improvement opportunity is found in the area of setting up a system for self-assessment and implementing a process for periodic review of the programme.

Based on the Methodology for the Alignment Assessment of Industry Programmes with the OECD Minerals Guidance (2018), the overall conclusion of the Alignment Assessment should be calculated and reported as follows:

*Fully Aligned:* (Section A = 100% of criteria 'Fully Aligned') + (Sections B and C = 80% or more of criteria 'Fully Aligned') + (no 'Not Aligned' criteria)

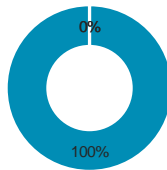
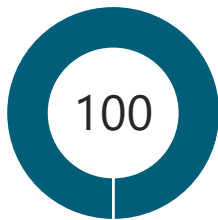


*Partially Aligned:* All other combinations between ‘Fully Aligned’ and ‘Not Aligned’ criteria

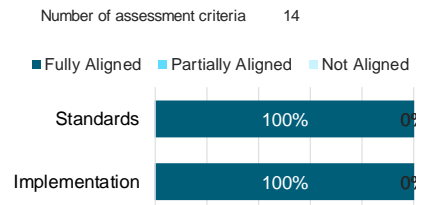
*Not Aligned:* (Section A = <50% of criteria ‘Fully Aligned’) OR (Sections B and C = 20% or more of criteria are ‘Not Aligned’)

Overall rating: **Fully Aligned**

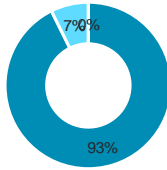
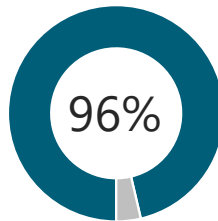
Overarching due diligence principles



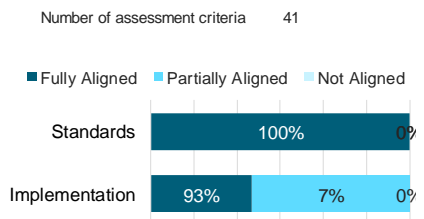
- Fully Aligned
- Partially Aligned
- Not Aligned



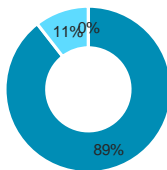
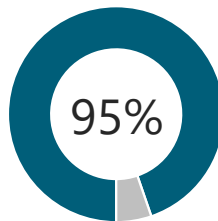
Overall alignment with five-step framework



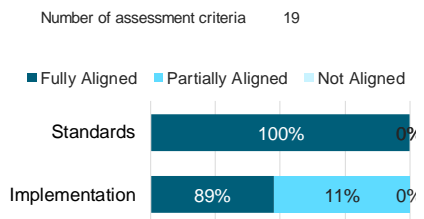
- Fully Aligned
- Partially Aligned
- Not Aligned



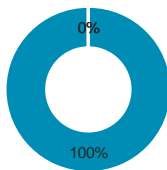
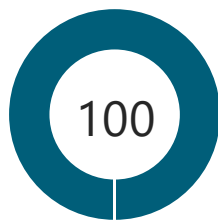
Step 1: Establish strong company management systems



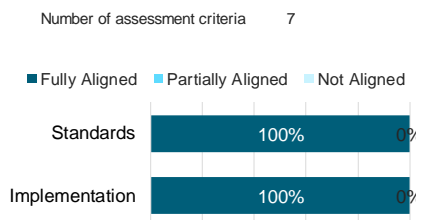
- Fully Aligned
- Partially Aligned
- Not Aligned



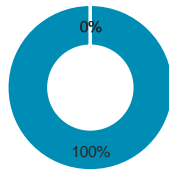
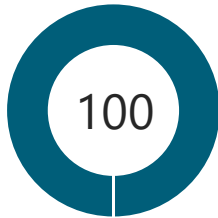
Step 2: Identify and assess risks in the supply chain



- Fully Aligned
- Partially Aligned
- Not Aligned

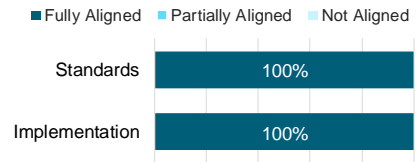


**Step 3: Design and implement a strategy to respond to identified risks**



- Fully Aligned
- Partially Aligned
- Not Aligned

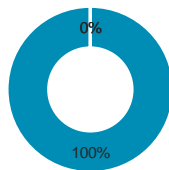
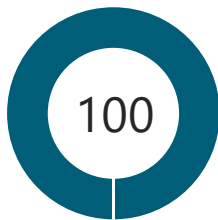
Number of assessment criteria 9



**Step 4: Carry out an independent audit at identified points in the supply chain**

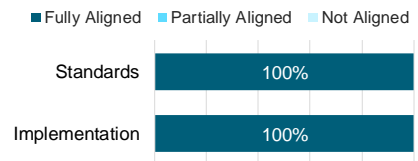
NA – Better Mining does not have an audit program as defined by OECD Due Diligence Step 4.

**Step 5: Report on supply chain due diligence**

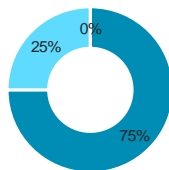
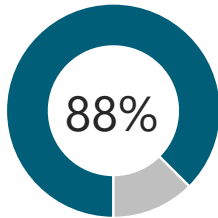


- Fully Aligned
- Partially Aligned
- Not Aligned

Number of assessment criteria 2

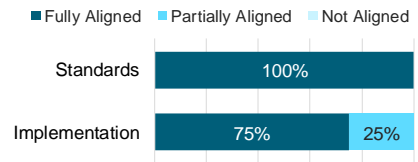


**Specific responsibilities of Programmes**

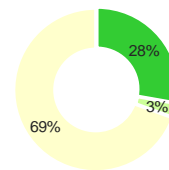
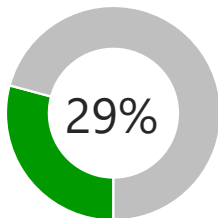


- Fully Aligned
- Partially Aligned
- Not Aligned

Number of assessment criteria 4



**Programme governance review**



- Fully addressed
- Improvement opportunity
- Not addressed

Number of assessment criteria 36

1. Section A (out of 14 criteria total in scope)
  - a. 14 out of 14 Fully Aligned
2. Section B (out of 37 criteria total in scope)
  - a. 35 out of 37 Fully Aligned
  - b. 2 out of 37 Partially Aligned
3. Section C (out of 4 criteria total in scope)
  - a. 3 out of 4 Fully Aligned

- b. 1 out of 4 Partially Aligned
- 4. Programme governance review  
One improvement possibility out of all applicable criteria.

Based on the assessment results, where in Section A all criteria are 100% Aligned, and criteria in Sections B + C are 92,68 % Aligned; the assessment results indicated Better Mining to be “Fully Aligned” as defined by the OECD’s Alignment Assessment methodology. The specific results section by section are provided separately in the Alignment Assessment Tool workbook.

## LIMITATIONS

The following assumptions have been considered for this Assessment:

1. Better Mining is an Upstream Mechanism implemented by consulting firm RCS Global Ltd, an SLR Company. Better Mining was originally developed with financial support of USAID and is not an Industry Program as defined in the Alignment Assessment of Industry Programmes with the OECD Minerals Guidance, or the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas 3rd Edition (OECD Due Diligence Guidance). The following is the OECD Due Diligence Guidance definition of an Industry Programme:

“For the purpose of this Guidance, this term means an initiative or programme created and managed by an industry organization or similar industry initiative to support and advance some or all the recommendations of this Guidance. An Industry Programme may be a part of the organization’s broader activities that encompass other goals. Any reference in this Guidance to relevant activities and/or initiatives of an Industry Programme is understood to mean that such activities and/or initiatives will be consistent with this Guidance. Better Mining is not run or managed by an industry organization or initiative.”

2. Better Mining is not an Institutionalized Mechanism as defined in the OECD Due Diligence Guidance. The following is the OECD Due Diligence Guidance definition of an Institutionalized Mechanism:

“For the purpose of this Guidance, this term means an organisation created by and composed of representatives of governments, industries, and civil society with a mandate to support and advance some or all of the recommendations of this Guidance. Any reference in this Guidance to relevant activities and/or initiatives of an Institutionalised Mechanism is understood to mean that such activities and/or initiatives will be consistent with this Guidance. BM was not created nor is composed of representatives of governments industries and civil society.”

## ASSESSMENT TEAM

**Lead Assessor: Kaido Katalsepp** has six years of experience conducting RMI OECD aligned due diligence assessments, Copper Mark assessments as well as 10+ years leading ESG, C-TPAT and other management

systems audits globally in 40+ countries. Kaido has led mine site and crude refiner assessments in Rwanda, DRC, Russia, Finland, Australia, and Canada. Kaido also has previous experience conducting Independent Alignment Assessments of upstream mechanisms using OECD methodology, as well as industry Standards alignment assessments. He is an APSCA certified auditor as well as ISO 9001, ISO 14001, ISO 45001 certifications. Kaido is fluent in English, Finnish, Estonian, and Russian. He resides in Estonia.

**Interpreter: Jean Claude Munyandinda**

**Project Manager: Emily Brennan** has conducted ESG and due diligence assessments in 30+ countries, analysing and reporting for a variety of industry sectors. She leads ARCHE's audit and advisory projects for the RMI, Copper Mark, LBMA and LME industry bodies. Emily has helped design, pilot and implement an array of responsible sourcing tools and advisory projects for global company programs and industry initiatives for all levels of varying commodity supply chains including minerals, agriculture and textiles. She is a qualified lawyer, an approved LME, Copper Mark, RMI and LBMA assessor, as well as APSCA and ISO 9001 certified.

## COMPANY OVERVIEW

ARCHE Advisors, Inc. ("ARCHE") is a small business S Corporation established in January 2013. Founder and CEO, Greg Gardner first began working in corporate responsibility strategy consulting in 1995. Executive team members have 15 to 25 years of experience alongside his, showing the extensive background of our management team in this industry. The majority of our team members have worked together for more than a decade, ensuring a high level of mutual trust and teamwork. We believe in our work; we believe in each other and we look forward to developing new relationships with clients who themselves seek to have a positive impact on the world we live in. In addition, we are committed to working to the highest levels of integrity, and ensuring our own policies and practices align to these aspirations.

ARCHE Advisors is renowned for our subject matter expertise in social and environmental auditing, traceability, supply chain due diligence and risk mitigation. Our team collectively has more than 200 years of experience helping clients manage the social and environmental impacts of their globalized supply chains. Our project team has over 10 years of experience auditing alignment of various standards for responsible sourcing in minerals and metals supply chains, and is an engaged RMI service provider. With years of experience in responsible sourcing, field assessments and project execution, our team of experts brings rich knowledge and experience to this project.