

RMI Assessment Procedure for Mica Processors

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I. Introduction

1. Objectives

This Assessment Procedure for Mica Processors details the requirements companies willing to take part to the Collective Auditing Protocol set up by RMI shall follow.

This procedure is applicable to auditing companies carrying out third-party audits, mica processors that may be audited and RMI members ordering the audit (usually downstream mica supply chain).

Anyone can raise concerns regarding this procedure by detailing the issue and emailing it to the following address: contact@responsible-mica-initiative.com

2. Background

The Responsible Mica Initiative (RMI) was created in 2017 by organizations eager to join forces to tackle the endemic problems that lead to the use of child labor in mica supply chains. Since its inception, RMI has aimed to establish a sustainable, fair and responsible mica supply chain, free of child labor and of unacceptable working conditions. RMI has grown to an action-driven, impact-oriented coalition for action gathering members across the global mica supply chain and from the NGO world, collaborating with Governments and all other relevant stakeholders.

As part of its action, the Supply Chain Mapping and Workplace Standards program is designed to secure and improve workplace conditions in the supply chain for mica collection and processing.

As soon as 2017, RMI developed Workplace Standards that include policies and practices that cover environmental management systems, occupational health and safety programs and fair labor practices which include prohibitions on child labor.

The Global Workplace Standard for Mica Processors was developed in 2020 and finalized in 2021 in partnership with the [Responsible Minerals Initiative](#). It is based on the initial Workplace Standards developed in 2017 by RMI and on the Minerals Due Diligence Standard developed by the Responsible Minerals Initiative based on its experience with other extractive industries.

From its publication date, March 16, 2021, the Global Workplace Standard for Mica Processors becomes the only referent document for the Responsible Mica Initiative, defining the standards to be met by mica processors.

Provisions of the standards incorporate elements of global voluntary standards or conventions such as those established by the International Organization for Standardization (ISO), the International Labor Organization (ILO), and the US Occupational, Safety and Health Administration (OSHA), the Organization for Economic Co-operation and Development (OECD).

This Assessment Procedure for Mica Processors is to be used in conjunction with the Global Workplace Standard for Mica Processors.

3. RMI's vision of the audit

Audits are widely regarded as an important tool to verify compliance and to point out vigilance and progress areas. However, audits can pose burdens due to cost and time. Auditing systems

are furthermore not 100% reliable, since they only provide a snapshot of a particular situation at a given moment in time.

Taking into account above founding findings, RMI considers audits as a powerful tool to support and guide progress, beyond a strict compliance assessment tool, and developed a Collective Auditing Protocol to carry out audits against the Global Workplace Standard for Mica Processors in a time- and cost-efficient manner.

Third-party audit is indeed considered by RMI as a tool that not only objectively enables to assess the level of compliance of the audited company at a given moment in time but also and mainly guide and personalize the handholding support to be provided to the auditee. Being a strong supporter of continuous progress, RMI considers that third-party audit is not a tool in itself, but that it shall be accompanied by additional features to always support the audited company to improve its performance. Hence the importance given to the support brought to miners and processors under RMI's programs, and to the choice of auditing companies - that shall share a similar vision as RMI's one about audits.

Under RMI's Collective Auditing Protocol, RMI is not ordering audits. It is the companies' responsibilities to ask for a particular mica miner or processor to be audited (see [Audit coordination by RMI](#)).

RMI's roles are

- To coordinate collective audits of mica processors ordered by RMI downstream members,
- To limit number and ensure efficiency of these audits,
- To regularly monitor the quality of the audits of mica processors against the Global Workplace Standard for Mica Processors,
- Most importantly, to support mica processors throughout the process of implementing the standard and filling potential gaps identified during third-party audits.

4. Applicability of the Global Workplace Standard for Mica Processors

In accordance with the OECD Due Diligence Guidance for Responsible Mineral Supply Chains from Conflict-Affected and High Risk Areas, Edition 3, the Global Workplace Standard for Mica Processors sets out steps to be taken to identify and address actual or potential risks in order to prevent or mitigate adverse impacts associated with processor activities or relationships, while recognizing that flexibility is needed in its application depending on individual circumstances and 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. RMI members are expected to use good faith and reasonable efforts in their due diligence and are expected to adapt the nature and extent of their environmental, OHS, social, governance and due diligence systems to their individual circumstances.

To guide effective expectation towards implementation of the standard, point out priorities and/or non-applicability, a set of documents are accompanying the Global Workplace Standard for Mica Processors, including

- This Assessment Procedure for Mica Processors
- An India audit checklist, including criticality level

The present procedure is applicable to RMI members (mica processors, mica exporters and downstream members), as well as mica processors / exporters that have not joined RMI as members but are part of RMI downstream members' mica supply chains.

5. RMI's expectations

As already stated above, RMI is a strong supporter of continuous support. RMI is therefore placing continuous improvement above the strict black-or-white compliance concept.

RMI's mission is to establish a fair, sustainable and responsible mica supply chain in India. Hence, RMI follows an inclusive approach aiming to provide a handholding support to all mica processors and exporters in India.

Based on the above founding principles, RMI is expecting (see Criteria's criticality):

- 100% compliance with 'ZT',
- 100% compliance with 'Major' criteria, or to have an existing corrective action plan in place to correct identified non-compliances and to implement corrective actions within due timelines,
- Compliance with 'Minor' criteria in the long term, according to RMI strategy to 2030.

These expectations are applicable to mica processors and exporters joining RMI as members, as well as any mica processor or exporter supplying RMI downstream members.

Time-bounding constraints differ depending on whether the mica processor or exporter joins RMI as a member:

- For mica processors or exporters joining RMI as members, RMI's expectations shall be met within one year after joining.
- For mica processors or exporters not joining RMI as members but being part of RMI downstream members' mica supply chain, RMI's expectations shall be met within one year after having been included in the supply chain mapping.

II. Disclaimers

RMI Assessment Procedure for Mica Processors follows the ISO 19011:2018 auditing standard in conducting an independent third-party assessment. Third-party auditing companies, in addition to be aligned with RMI's vision of the audit, are required to adhere to the ISO 19011:2018 auditing standard in conducting an independent third-party assessment.

RMI is not a certification body. **Being a company that demonstrates compliance with the Global Workplace Standard for Mica Processors does not have any value of producing nor sourcing 'child-labor-free' mica, nor mica free of human rights abuses.** Being audited against the Global Workplace Standard for Mica Processors and against the present procedure does not result in any material certification.

The hereby Assessment Procedure for Mica Processors has been designed and proposed by the Traceability and Workplace Standard action group of the Responsible Mica Initiative. It was validated by RMI's Board of Directors on December 1, 2021.

RMI reserves the right to adapt the hereby Assessment Procedure for Mica Processors at any time, based on implementation experience, best practices, lessons learned. The only valid version of the hereby procedure is the version that is available on RMI's website.

III. Definitions and acronyms

Audit: A formal evaluation of an organization's performance, management systems, processes, against criteria established independent of the audited organization.

Auditee (or Audited company): The organization being audited.

Auditor (or Auditing company): The organization conducting the audit against specific criteria or standard.

Corrective action plan (or CAP): List of time-bounded corrective actions established by the auditing company in partnership with the audited company that aim to correct non-compliances identified during the audit.

Global Workplace Standard for Mica Processors: Set of criteria covering several components (Environment, Social, Occupational Health and Safety, Governance, Due Diligence) established in partnership between the Responsible Mica Initiative and the Responsible Minerals Initiative. It is applicable to all mica processors and exporters in the world.

Ordering member: A RMI member asking for one or several processors to be audited and taking part to the collective audit protocol.

Mica processor (or processing unit): A registered organization that purchases raw mica and processes it into processed mica by grinding, sorting, milling raw material.

Mica exporter: A registered organization that purchases raw or processed mica and exports it abroad. Due to vertical integration, an organization may both process and export mica. Mica processors and mica exporters *stricto sensu* do exist and fall under the applicability of the Global Workplace Standard for Mica Processors.

Third-party audit: An audit conducted by an auditing company independent of the organization being audited, as well as of the organization ordering the audit.

IV. Pre-audit period

1. Support to the audited company

1. Training sessions

Training sessions facilitated by RMI are tailored for processing units' managers and workers to ensure that the Global Workplace Standard for Mica Processors are understood and adhered to. Training sessions are open to members (at no cost) and non-members of RMI (at a modest fee). They can be used as a preparation tool in pre-audit periods, and as a corrective tool in post-audit periods, when specific gaps are pointed out during audits.

Training calendar is available on RMI website resource center. To receive the training calendar, one can send an email to the following email address: contact@responsible-mica-initiative.com

2. Online self-assessment

Processors and exporters joining RMI as active members must complete a Compliance Self-Assessment (CSA) on a quarterly basis, using an online tool, that enables them to first identify areas of improvement and then demonstrate progress. Identified gaps between current and desired workplace practices provide the basis for individual Suggestions on Improvement Areas (SIAs), to be issued by RMI.

Results of quarterly CSA as well as SIAs shall remain entirely confidential, and only accessible by individual member-processor or member-exporter as well as the RMI Executive Team.

Access to the online self-assessment tool is free of charge and included in the RMI-membership of all mica processors and exporters. The RMI Executive Team is responsible for the creation of one license per processor / exporter that is a RMI member.

2. Eligibility of a company to a third-party audit at the end of first year after joining RMI

This paragraph is only applicable to mica processors and exporters that are RMI members.

At the end of the first year after joining RMI, each mica processor or exporter's overall progress versus implementation of the Global Workplace Standard for Mica Processors is assessed by RMI Board of Directors, based on Executive Team's data, feedbacks and analysis.

- Should the processor or exporter have demonstrated a significant progress throughout its first year of membership (compliance with all Zero Tolerance criteria, and compliance with or CAP in place for all Major criteria), the processor / exporter is eligible to a first third-party audit under RMI Collective Auditing Protocol, ordered and financed by RMI.
- Should the progress not be significant, but the Board of Directors considers that due reasons can explain the delay or low progress, then the processor / exporter will be given an additional 6-month period to show progress (compliance with all Zero Tolerance criteria, and compliance with or CAP in place for all Major criteria, see [Criteria's criticality](#)).
- Should the progress not be significant, and the Board of Directors considers that no due reason can explain the delay or low progress, then the processor / exporter's membership will be revoked.

The first third-party audit is therefore ordered and fully financed by RMI. Following audits are then financed by RMI downstream members, according to the below protocol (see [Audit coordination by RMI](#) and [Audit costs sharing](#)).

3. Audit coordination by RMI

To manage planning, audits are scheduled twice a year for the upcoming six months by the RMI Executive Team, as per the below process:

1. Once every six months, RMI members are asked by the RMI Executive Team to share their wish list of processors / exporters to be audited in the upcoming 6 months. This wish list is shared with the RMI Executive Team only and under NDA.
2. Based on these individual wish lists, the RMI Executive Team build a preliminary list of processors / exporters to be audited composed of all processors listed in members' individual wish lists, associated with the number of companies asking for each of them to be audited.
3. The RMI Executive Team shares this list with all members, who in return, may confirm or disconfirm their intention to see processors / exporters be audited by writing. This confirmation / disconfirmation has a value of commitment to participate to and finance the audit when it is carried out.
Depending on the results of this two-step process, one member might be the single ordering company for a given audit.

All processors / exporters might be included in the coordination list prepared by RMI, whether they are RMI members or not.

4. Sharing audit cost

Audit costs are shared among the organizations which asked for a particular audit to take place:

- If several organizations ask for a specific processor / exporter to be audited, audit cost is shared equally among them all.
- If only one organization asks for a specific processor / exporter to be audited, this organization will bear the cost of the audit on its own.

5. Selection of the auditing company

RMI does not impose any third-party auditing company to carry out third-party audits but recommends a few of them to its members.

A list of recommended auditing companies is kept up to date and made available to RMI members. Auditing companies are regularly screened by RMI, under several criteria including, but not limited to:

- Their vision of the audit and related approach,
- Their experience in India and in mica industry especially,
- Their experience in social audits and due diligence, and with regards to child labor especially,
- Their capacity to accompany the audited company in co-building then implementing a Corrective Action Plan,
- The cost of an audit.

Auditing methodologies as well as specific auditors will be regularly assessed and challenged by RMI Executive Team (audit assessment, comparison between self-assessment results, audit results and RMI own assessment), in particular in the event of doubts regarding the robustness of the audits.

1. Selection of the auditing company for third-party audits ordered by RMI

As explained under Eligibility of a company for a third-party audit at the end of first year after joining RMI section, at the end of the first year after joining and in case a processor / exporter is declared eligible to a first third-party audit, RMI engages a third-party auditing company to carry out this audit.

RMI selects an auditing company based on the recommendation list it continuously keeps up to date (see above).

The auditing company shall be selected within 1 week after a processor / exporter is declared eligible for a third-party audit.

2. Selection of the auditing company for third-party audits ordered by members

Once a processor / exporter is planned to be audited by a third-party auditor at the end of the coordination phase (see Audit Coordination By RMI), the RMI Executive Team contacts individually all members that order each particular processor to be audited, for them to collectively select an auditing company to carry out the third-party audit.

This first contact shall take place no later than 1 week after the end of the coordination phase.

- Within 1 week after this first contact, members have to share with the RMI Executive Team three auditing companies they wish to select to conduct the audit, by order of preference. Based on the answer(s) of member(s) ordering a given audit, the RMI Executive Team will select the auditing company that reaches the highest rank.

- If for a given ordered audit, no auditing company outstands from this first selection round, the RMI Executive Team selects one of the proposed companies, based on cost and capacity.

6. Informing companies about the audit and selection of the date of the audit

Once the auditing company is selected, and within 3 days after the selection of the auditing company, the RMI Executive Team introduces the auditing company to the audited company.

RMI recommends that only coordinators contact information is shared with the audited company, rather than the contact information of the auditor directly. Auditing companies are therefore encouraged to share with the RMI Executive Team the contact information of their local coordinator.

The RMI Executive Team provides the following pieces of information to the audited company and the auditing company:

- Contact information,
- Planning of the preparation for the audit,
- Audit documents and tools (The Global Workplace Standard for Mica Processors, the audit grid template, the audit report template, the Corrective Action Plan template).

Within 3 working days after receiving the request, the auditing company must confirm receipt and start scheduling the audit date with the audited company.

The RMI Executive Team should be copied on all exchanges. **The ordering members should not be in any email exchanges with the audited company.**

A period of 15 days during which the audit will take place is confirmed between the auditing company and the audited company. This 15-day period should not start earlier than 15 days after the date of the confirmation.

On the final scheduling confirmation email, the auditing company must include the required document list, general audit agenda, the audit team, and the audit team lead. The auditing company must also retain signed authorization to take photos or copies during the scheduling process. In case the audit is planned faster than within the next 15 days, the timeline must be commonly agreed on by both parties (auditing company and audited company).

The 15-day period during which the audit takes place should be confirmed within 30 days after the auditing company contacted the audited company (the date itself can farther out).

The RMI Executive Team individually informs the ordering members about the 15-day period during which the audit will take place within the next 3 days following the date of confirmation. The auditing company must inform the RMI Executive Team of any changes to the schedule as soon as possible.

The RMI Executive Team remains available to answer any question from the auditing company or the audited company about the process. Issues raised related to the content of the documents are left to both auditing and audited companies.

V. Onsite Audit

1. Confidentiality

The audit report, audit grid and corrective action plans are shared by the auditing company with the audited company, the ordering members and the RMI Executive Team.

RMI recognizes the following:

- Both parties (auditee and ordering company) are providing resources for the audit to take place (effort and time on one hand, financial resources on the other hand).
- Ordering members are the owner of the audit and therefore of the report and results. As such, ordering members are free to share the audit results with any external third party, with written consent of the auditee and while maintaining confidentiality of the content/report.
- The auditee might need, for commercial purposes, to share part of or all the audit results.
 - o The auditee is therefore free to share the percentage of criteria with which they are compliant, by level of criticality with any external third party: one percentage for Zero Tolerance criteria, one percentage for Major risk criteria and one percentage for Minor risk criteria.
 - o The auditee is able to share the full audit report with an external third party, at the condition of having the written agreement of the owner(s) of the audit.

In case the audit results are shared by the auditee with an external third party that is a RMI member which did not participate to the audit cost, this RMI member, if it sources mica from this particular auditee, should share the cost of any upcoming audit of this auditee.

The auditing company and audit team are not allowed to share with any third party any confidential information, including but not limited to business-related pieces of information (list of suppliers, list of customers, prices, ...). The audit report shall include under no circumstances such confidential information.

2. Audit duration

Based on its benchmark and experience witnessing onsite audits, RMI recommends a given number of man-day to the auditing companies to complete a specific audit. In case of strong disagreement from the auditing company, the latter can engage a discussion with the RMI Executive Team to find a collective solution.

Here is the general guidance. According to mica processing units' company size, audit duration should be of 2 man-days. It may change depending on the circumstances.

| Audit Type | Number of Workers | Man-days |
|-----------------|-------------------|----------|
| Initial, Annual | 1-250 | 2 |
| | 251-999 | 3 |
| | 1000-4999 | 4 |
| | 5000+ | 5 |
| Follow Up | 1-4999 | 1 |
| | 5000+ | 2 |

3. Requirements for the auditing company

The detailed agenda shared by the auditing company with the audited company is left at the discretion of the auditing company. However, it shall include the following components:

- List of personnel engaged in the audit team and their responsibilities,
- Contact information of both auditing and audited companies,
- Date(s) of the onsite audit,

- Specific unit(s) / facility(ies) to be audited
- Planned date of issue of the audit report.

4. Requirements for the audited company

Audited company shall share with the auditing company the documents required for the audit according to the timeline stated in Informing companies about the audit and selection of the date of the audit.

5. Opening meeting

At the beginning of an onsite audit, an opening meeting takes place with the auditing company represented by its audit team, the audited company represented by its management and relevant personnel.

Should the auditee agree with it, RMI CSR auditor and trainer may also attend the opening meeting, and full audit.

The agenda of the meeting covers the following components:

- Introduction to RMI audit protocol, including RMI vision of the audit¹,
- Key objectives of the onsite audit and how it will be used to support the audited company to improve its performance against the Global Workplace Standard for Mica Processors,
- Introduction of the audited company, including but not limited to a presentation of the facilities and key figures (number of personnel involved in the audited company, turnover, key accounts, ...). As well, an introduction to known issues and non-compliances is welcome.
- Presentation of the onsite audit, including but not limited to the scope, methodology, evidence sampling process and reporting process,
- Presentation of onsite audit agenda over the coming day(s) - this section is the opportunity to confirm the availability of required personnel of the audited company,
- Finally, confirm the agreement of all participants to the audit plan.

6. Collection of evidence

Pieces of evidence collected by the auditing company shall be objective.

Several ways to collect evidence, detailed hereafter, might be used throughout the onsite audit.

1. Visual observation

The first priority is to guarantee the health and safety of the audit team and any personnel accompanying the team throughout the site tour. The audit team shall wear PPE wherever relevant. If the facility has none, auditing team is visiting the site under its own responsibility. It is recommended that the auditing team brings a minimum protective equipment, just in case (safety boots, glasses, helmet).

The audit team shall carry out at least one tour of the audited facility (more than one may be necessary to visit all facilities).

¹ If RMI CSR auditor and trainer is available for the opening meeting, he/she presents this first section. In case he/she is not available, the auditing lead auditor presents the slides. RMI provides the slides for this first section to the auditing company.

A planning meeting shall take place to plan the tour (or to plan the tour during the opening meeting). The goal of tour planning is to ensure that the tour will not disturb the ongoing work or interfere at a minimum level, and that the tour will be carried out in the safe conditions.

All facilities are inspected by the audit team, including but not limited to processing areas, shipping areas, warehouse, laboratory, offices, and accommodations.

The audit team shall have access to the complete workplace, with no restriction.

If an extra-ordinary incident occurs during the tour (accident, failure to reach a specific area of the facility, communication issues, ...), the audit team leader shall decide with the audited company representative whether the audit shall be interrupted, rescheduled, or continued.

2. Interviews with employees and other individuals

Interviews are a key mean to collect information and to check consistency of audit findings. RMI recommends that, as much as possible, a minimum of the highest figure between 10 onsite interviews or 10% of the global workforce shall be carried out.

Interviews shall be conducted by respecting the free will of the interviewee at any time.

While introducing the interviewee to the interview, the interviewer shall respect the following rules:

- The interviewer shall present the context of the interview, as well as his/her company, and the objective of the interview - here, the RMI Executive Team might provide a few paragraphs to the auditing company to support the interviewer in introducing the context associated with the audit,
- The interviewer shall clarify that the interview is anonymous, that under no circumstances, answers will be related to the interviewee,
- The interviewer shall clarify that answers will be kept confidential and will only be analyzed only in an aggregated form, without referring to a particular interviewee,
- The interviewer shall state that the interview is under no circumstances an evaluation of the interviewee nor of any personnel of the audited company nor of the audited company itself,
- No question shall be mandatory - the interviewer shall clarify that the interviewee can choose not to answer to any question at any time, as well as to stop the interview at any time.

As well, interviews shall:

- Be conducted during normal working hours and where practical, at the normal workplace of the interviewee,
- Be initiated by asking the interviewee to describe his/her work,
- Include a conclusive remark summarizing all key answers of the interviewee to ensure their understanding by the interviewer and their accuracy,
- Include a final remark from the interviewer to thank the interviewee for his/her time and participation,

RMI recommends that the interviews are:

- Conducted during working hours,
- Conducted in a room that is visually separated from managers' sight,
- Either formal ones or spontaneous,
- Either confidential or not (the management shall not prevent an interview to be conducted because of confidentiality),
- Involving a trade union representant where relevant.

Both managers and workers shall be interviewed. Though the selection of interviewees is up to the choice of the auditing company, interviewees should include, but are not limited to:

- The manager responsible for workplace practices,
- At least one other manager,
- Workers from any functional areas (production area, warehouse, finance, accommodation, ...).

Interviewees might be selected randomly. In such case, the management shall not interfere with the selection process under any circumstances.

Interviews can be carried out individually or in groups, upon decision of the auditing company.

3. Documents review

Any document that the auditing company finds relevant is included in the review. The review might include one or several documents from the list below:

- Documented information (policies, objectives, plans, procedures, standards, instructions, ...),
- Legal documents (licenses and permits, registration, ...),
- Records (such as inspection records including self-inspection records as explained in Online self-inspections, minutes of meetings, audit reports, records of monitoring programs, staff and attendance records, incident records, ...),
- Data (summaries, raw data, analyses and performance indicators, ...),
- Databases,
- Websites,
- Secondary sources (reports from external sources, customer feedbacks, external surveys or measurements, ...).

The selection of relevant documents is up to the auditing company, based on its own judgement.

In case the audited company developed policies, the auditing company and audit team shall verify the following points:

- Whoever is concerned (worker and/or manager) is aware of the existence of such policies,
- Whoever is concerned (worker and/or manager) understands such policies,
- Processes exist to implement such policies,
- Policies are effectively implemented in all related facilities.

7. Communication during the audit

During the audit, the audit team leader shall communicate transparently with the audited company about his/her findings.

Should formal communication be required at any time of the audit, a written formal communication shall take place, including the RMI Executive Team in the exchanges.

8. Specific case of emergency

As stated in the Global Workplace Standard for Mica Processors, in case of immediate danger, any member of the audit team as well as any worker has the right to stop the work.

9. Closing meeting

Should the audit last for more than one day, the audit team leader shall set up an evening meeting with the management to:

- Present his / her findings,
- Share limitations,
- Update the management on the activities completed so far and the way forward.

Should the management not be available for such daily debrief, the audit team leader shall send a summary of his / her findings to the management, including the RMI Executive Team in the exchange.

At the end of the audit, the audit team leader shall share with the audited company the list of documents and evidence it gathered during the audit, including the RMI Executive Team in the communication.

A closing meeting shall be organized on site at the end of the audit, with the audited company's management. During this meeting the following items are discussed:

- Audit's findings and recommendations are presented by the audit team to the management,
- Potential disagreement about findings should be resolved during the closing meeting. If not resolved, the audit team leader includes the disagreement in the audit report,
- Preliminary leads to correct non-compliances are presented by the audit team to the audited company's management.

VI. Audit reporting

The auditing company has the responsibility of audit reporting. Audit reporting shall include the audit grid and the audit report.

1. Audit grid

The audit grid (or audit checklist) template is provided by RMI. It shall be duly filled in.

In case it was not possible to assess one or several criteria, it shall be clearly stated, including the reason explaining why the criterion was not assessed.

2. Criteria's criticality

RMI considers that all criteria under the Global Workplace Standard for Mica Processors don't have the same level of criticality. They are therefore ranked according to their criticality, which is divided into three categories: Zero Tolerance, Major risk, and Minor risk.

The criticality level for each criteria (ZT, Major, Minor) can be found in the audit grid template, available on RMI website resource center.

Compliance with the criteria is an expectation of RMI, as it is mentioned in [Objectives and applicability](#). Timeline to reach compliance is described in the below paragraphs.

It shall be noted that an exception may arise for criteria related to regulation and official registration. Indeed, not only fulfilling such criteria may take more time than the timeline presented in the below paragraphs, but these criteria are also not entirely under auditee's control. A case-by-case analysis shall be carried out in case of non-compliance with criteria related to regulation and registration.

1. Non-compliances requiring immediate action during the audit

In case the audit team is confronted to one of the below non-compliances, the audit shall be immediately terminated. The RMI Executive Team is made aware of the situation, as well as all organizations that ordered the audit. The audit report shall clearly mention the root reason that explains the decision to stop the audit.

- A severe breach which represents an immediate danger to workers / those on site,
- A severe breach which leads to an immediate major and harmful effect on the environment,
- An attempt to pervert the course of the audit through fraud, coercion, deception, interference, falsification of documents, concealment of documents or pieces of evidence, reducing access to certain areas or deliberate damage to brand reputation.
- The access to some areas of the audited company, to relevant documentation or to key site personnel is denied to the audit team by the audited company,
- Any bribe is offered to any member of the audit team by the audited company,
- It is proven that documentation has been falsified by the audited company, or with the knowledge and acceptance of the audited company,
- The audited company deliberately misrepresents facts through deception, coercion or interference.

Based on the own judgement of the auditing team, other situations may arise and could require the audit to stop, though not described above.

2. Zero Tolerance criteria

Non-compliances with Zero Tolerance criteria require a short term action from the audited company and shall be corrected within 45 days after the audit.

Non-compliances with Zero Tolerance criteria include:

- A severe breach which could lead to a fatality risk to workers / those on site, or which constitutes a severe breach of workers' human rights,
- A severe breach which could lead to major and harmful risks to the environment,
- A severe material breach of a code requirement / law,
- A systematic and deliberate breaking of a code requirement / law,
- A major non-compliance that has not been addressed over time, or for which no significant improvement has been made.

3. Major risk criteria

Non-compliances with Major risk criteria require a mid-term action and shall be corrected within 6 months after the audit.

Non-compliances with Major criteria include:

- A material breach of a code item or local law which does not represent a fatality risk to workers / those on site, but which represents a danger to workers / those on site,
- Any breach which constitutes an infringement of workers' human rights,
- Any breach which represents a danger to the environment in the short and medium term (days to months),
- A minor non-compliance that has not been addressed over time, or for which no significant improvement has been made.

4. Minor criteria

Non-compliances with Minor risk criteria require a long-term action and shall be corrected within 12 months after the audit.

Non-compliances with Minor criteria include:

- An occasional or isolated problem,
- An issue which does not represent a danger (physical injury) to workers / those on site, but which represents a low risk to workers / those on site,
- Any breach which represents a danger to the environment in the long term (years),
- A policy issue or misunderstanding where there is no evidence of a material breach.

3. Audit report

The audit report template is provided by RMI. It shall be duly filled in and shall report on all key findings identified during the audit.

The audit report shall include as much as pictorial material as possible to support the findings.

Whenever possible, the audit report should be made accessible to workers.

4. Finalizing audit results

Draft audit results (draft audit grid and draft audit reports) shall be shared by the auditing company no later than 7 days after the onsite audit with the RMI Executive Team and the audited company.

No later than calendar 7 days after receiving the draft report, the audited company and the RMI Executive Team shall send their comments to the auditing company.

1. Specific case of the first third-party audit ordered by RMI

The final audit report (in PDF format) and audit grid shall be shared by the auditing company with the following stakeholders, no later than 3 days after receiving edits and comments:

- The audited company's management,
- The RMI Executive Team.

The auditing company should select a few key audit findings in the audit report and highlight them to the audited company. The audited company can then display these key findings in its facilities for the workers to be made aware of them.

2. General case of third-party audits ordered by members

The final audit report and audit grid shall be shared by the auditing company with the following stakeholders, no later than 3 days after receiving edits and comments:

- The audited company's management,
- Companies which ordered the audit (see [Audit coordination by RMI](#)),
- The RMI Executive Team.

The auditing company should select a few key audit findings in the audit report and highlight them to the audited company. The audited company can then display these key findings in its facilities for the workers to be made aware of them.

VII. Corrective Action plans

In addition to the audit grid and audit report, the auditing company has the responsibility to co-build a corrective action plan to correct potential non-compliances identified during the onsite audit with the audited company.

The corrective action plan template is provided by RMI.

1. Requirements for the corrective action plan

All corrective action shall be time-bounded, according to the criticality presented in Criteria's criticality.

RMI strongly encourages both the auditing company and the audited company to co-build the corrective action plan.

As much as possible, the corrective action plan should be translated in a language that is understandable to most of the audited company's managers and workers.

As for the audit report, the corrective action plan shall include pictorial materials as much as possible to ease the understanding of findings and corrective actions to be implemented to correct non-compliances.

2. Corrective action plan sharing

The auditing company shall share the corrective action plan no later than 14 days after sharing final audit report and audit grid.

The corrective action plan is made available to workers & management, incl. trade unions.

A copy of the corrective action plan is shared by the auditing company with the audited company, the ordering companies and the RMI Executive Team. Having access to the corrective action plan is key for ordering companies and the RMI Executive Team to be able to best support the audited company in correcting non-compliances.

3. Corrective action plan implementation

During the implementation of the corrective actions, the audited company counts on the support of ordering companies as well as the RMI Executive Team, especially on RMI CSR auditor and trainer's support.

Ordering companies and the RMI Executive Team support the audited company in identifying key improvement areas and in focusing on correcting significant non-compliances.

The audited company commits to contact the RMI Executive Team to share its progress with regards to the implementation of the corrective actions, according to the following frequency:

- Weekly contacts during the first 45 days after the completion of the audit,
- Monthly contact afterwards.

These regular updates shall include the corrective action plan and for each item of the corrective action plan, the current status and the progress so far. Should any discrepancy be identified, it shall be highlighted in the update.

These regular updates are critical to well structure and personalize the support brought by RMI to the audited company during the implementation of corrective actions.

At the end of the 90 days, the auditor company should send a closure email detailing the status of each issue and comment on the general cooperation of the auditee throughout the process. Any open issues, RMI will manage directly with the auditee.

Should the progress made by the audited company in the implementation of the corrective actions not be considered as acceptable by the auditing company, the auditing company shall escalate to the RMI Executive Team.

VIII. Scheduling and ordering audits

1. Initial audit

The initial third-party audit is ordered by RMI based on the decision of the Board of Directors with regard to the eligibility of the audited company.

2. Annual audit

RMI strongly encourages all mica processors / exporters whether having joined RMI as members or belonging to RMI downstream members' mica supply chain to be audited at least once a year.

3. Follow up audits

Depending on the outcomes of the third-party audit, the audited company might have to be audited again to verify that non-compliances have been corrected according to the timeline described in Criteria's criticality.

Follow up audits will focus on correction of the non-compliances according to their criticality: primarily focusing on ZT non-compliances, then Major and finally Minor non-compliances.

Follow up visits by RMI CSR auditor and trainer will be scheduled with the audited company as much as possible.

Additional time to correct non-compliances can be accorded to the audited company depending on the situation and the judgement made by the auditing company.

IX. Long-term accompaniment of audited companies

After the end of the first year after joining RMI as members, processors / exporters must complete a Compliance Self-Assessment (CSA) every six months, using an online tool. This ensures the continuous close follow up of member-processors' or member-exporters' progress by the RMI Executive Team.

Areas of improvement and continuous progress keep being monitored. Identified gaps between current and desired workplace practices provide the basis for individual Suggestions on Improvement Areas (SIAs), to be issued by RMI.

Results of CSA as well as SIAs shall remain entirely confidential, and only accessible by individual member-processor or member-exporter as well as the RMI Executive Team.

Access to the online self-assessment tool remains free of charge and included in the RMI-membership of all mica processors and exporters. The RMI Executive Team is responsible for the creation of one license per processor / exporter that is a RMI member.

X. Monitoring of the audit quality

Once a year, the RMI Executive Team selects a few reports of audits that took place during the past year. By comparing these selected audit results with on-site observation and results from the online self-assessments, the RMI Executive Team judges on the quality of the audits.

In case significant discrepancies are identified between internal observations and audit results, the RMI Executive Team engages a discussion with the auditee and with the auditing company in order to collect the reasons explaining such gaps.

The RMI Executive Team updates the list of recommended auditing companies accordingly.

ANNEX-1 - Timetable

| Event / action | Responsible entity | Involved entity | Timeframe <i>(all durations are expressed in calendar days)</i> |
|---|-------------------------------------|--|--|
| Eligibility of a RMI member processor to be audited | RMI Board of Directors | Processor members | 1 year after joining RMI |
| Selection of an auditing company (for the first third-party audit ordered by RMI) | RMI Executive Team | Auditing company | Max. 1 week after eligibility decision |
| Collective audit coordination phase | RMI Executive Team | RMI members | Every 6 months |
| First contact by the RMI Executive Team with ordering members to suggest auditing companies | RMI Executive Team | RMI members | Max. 1 week after the end of the coordination phase |
| Share 3 auditing companies to carry out third-party audits | Ordering members | RMI Executive Team | Max. 1 week after first contact |
| Selection of an auditing company based on the preference of ordering members | RMI Executive Team | Ordering members Auditing company | Max. 1 weeks after first contact |
| Inform auditing company and audited company about the choice of the auditing company | RMI Executive Team | Auditing company Processor member (audited company) | Within 3 days after final selection of the audited company |
| Share templates (audit grid, audit report, CAP) with the auditing company | RMI Executive Team | Auditing company Audited company | Included in the above communication |
| First contact by the auditing company with the audited company | Auditing company | Audited company RMI Executive Team | Within 3 days after RMI Executive Team' email informing auditing company and audited company about the audit |
| Selection of the 15-day period during which the audit will take place | Auditing company Audited company | RMI Executive Team | Within 30 days after the first contact |
| Inform ordering members about the 15-day period during which the audit will take place | RMI Executive Team | Ordering members | Within 3 days after selection of the period |
| Send the list of documents required for the audit | Auditing company | Audited company RMI Executive Team | Min. 15 days before the start of the 15-day period during which the audit will take place |
| Send the required documents to the auditing company | Audited company | Auditing company | Min. 15 days before the start of the 15-day period during |

| | | | |
|---|---------------------------------------|---|--|
| | | RMI Executive Team | which the audit will take place |
| Share a tentative agenda to the audited company | Auditing company | Audited company RMI Executive Team | Min. 15 days before the start of the 15-day period during which the audit will take place |
| Onsite audit | Auditing company Audited company | RMI Executive Team (if possible) | As agreed by both parties |
| Opening meeting | Auditing company | Audited company RMI Executive Team (if possible) | On the first day of the audit |
| Submit a draft audit report to the RMI Executive Team and the audited company | Auditing company | Audited company RMI Executive Team | Within 7 days after the completion of the audit |
| Submit edits and comments to the auditing company | Audited company RMI Executive Team | Auditing company | Within 7 days after receiving the draft report |
| Submit final report and audit grid | Auditing company | Audited company Ordering members (if relevant) RMI Executive Team | Within 3 days after receiving the edits and comments |
| Sharing the corrective action plan | Auditing company | Audited company RMI Executive Team | Within 14 days after sharing final report and audit grid |
| Implement the corrective action plan | Audited company | RMI Executive Team | Depending on criticality level of non-compliances identified during the audit Weekly updates by the audited company to the RMI Executive Team on the progress during the first 45 days after audit's completion, monthly updates afterwards |
| Close Corrective Action Plan Remediation Activities | Audited company | Audited company RMI Executive Team | 90 days after the final report and audit grid |