

Mica Sourcing Philosophy and Guidelines RMI

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I. Introduction

Disclaimer

This version is a first version of RMI Mica Sourcing Philosophy and Guidelines. It does not include the first step of the mica supply chain on purpose (i.e. mica mines and collection sites), since the local and current context does not allow the Responsible Mica Initiative to bring the needed handholding support to actors of the first step of the supply chain.

This first version will be updated by including further guidelines related to mica mines and collection sites as soon as a clear legal framework is in place in Bihar and Jharkhand states in India.

1. Objectives

This Mica Sourcing Philosophy and Guidelines document has two aims:

- Detailing the philosophy of RMI's approach related to the implementation of responsible workplace practices in the mica supply chain
- Providing concrete guidelines to its members to support them in fulfilling their commitments.

This document is publicly available but is mostly addressed to RMI members along the supply chain from mica processors to brands passing by intermediary products manufacturers.

Anyone can raise concerns regarding this document 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 contribute to the establishment of a sustainable, fair and responsible mica supply chain, free of child labor and of unacceptable working conditions.

To reach that goal, 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.

A holistic approach, based on three pillars of action, is followed by RMI. First, RMI's approach recognizes the need for an efficient and effective improvement of working conditions in mica mines and processing units. Secondly, RMI's community empowerment programs elevate village social and economic conditions, enabling communities to send their children to school rather than collect mica. Finally, supporting adoption of a comprehensive legal framework to regulate the mica sector will foster a responsible compliance-based industry across the entire region.

Long Term India Strategy of The Responsible Mica Initiative



 GLOBAL VISION A world in which mica supply chains are fair, responsible, sustainable and free of child labor			
 INDIA MISSION Engage multiple stakeholders under a Coalition for Action to contribute to the establishment of a fair, responsible and sustainable mica supply chain in Bihar & Jharkhand that is free of child labor and provides responsible working conditions			
PROGRAMS AREAS 2030 TARGETS 2021 – 2030 STRATEGY RELATION TO Eradication of Child Labor Establishment of Responsible Supply Chains	1 Responsible Workplace Standards	2 Community Empowerment	3 Legal Frameworks
	100% of members' volumes from Jharkhand & Bihar are compliant with responsible workplace standards ▶ By 2022, RMI members ensure that 30% of their mica volumes from Bihar & Jharkhand are compliant with the Global Workplace Standard for Mica Processors; 50% by 2025; 100% by 2030. ▶ By 2025, RMI members ensure that 30% of their mica volumes from Bihar & Jharkhand are compliant with responsible workplace standards for Mica Collection; 100% by 2030. ▶ By 2030, RMI members ensure that 100% of the mica workers within their Jharkhand & Bihar supply chains are receiving a living income based fair price for mica. ▶ Continuously ensure 100% tools and solutions developed under RMI are suitable and available to the larger mica business community. Standards apply zero tolerance on the use of child labor and advocate for payment of fair local wages Ensure responsible workplace practices along members' and all mica supply chains	100% of mica-dependent villages in Jharkhand & Bihar are covered by components of community empowerment programs, thanks to a coordinated approach ▶ By 2030, 100% of mica-dependent villages are covered by components of Community Empowerment Programs thanks to a coordinated approach, including 120 villages supported directly by RMI programs by 2022 and 300 villages by 2030. In RMI program villages, ▶ 100% of children are regularly in school and have access to a quality education; and ▶ 100% of mica-dependent households' livelihood is increased, contributing to a better life. Poverty and lack of quality education are two root causes of child labor which CEPs are designed to address Empower mica-dependent households and reduce child labor occurrences along members' supply chains as well as in the whole mica belt	Aim for 100% of mica workers to be benefiting from a clear and enforced legal framework in Jharkhand & Bihar ▶ By 2022, 50% of mica volumes exported from Jharkhand and Bihar is used by organizations that are RMI members and committed to address mica-related issues in their supply chains; 80% by 2025; 100% by 2030. ▶ Continuously advocate and aim by 2025 to have 100% of mica workers benefiting from a clear and enforced legal framework in Jharkhand; by 2030 in Bihar. ▶ Continuously advocate for supranational bodies and national governments in mica importing countries to adopt legal frameworks favoring responsible mica sourcing practices. Formalization and legal recognition of mica mining activities will make child protection laws enforceable Collectively accelerate transformation of practices at territory level, benefiting members' supply chains. Increase legitimate and legal sources of mica

As part of its actions, 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 responsible labor practices which include the prohibition 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 for India specifically 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 reference document for the Responsible Mica Initiative, defining the standards to be met by mica processors in all countries.

All organizations joining RMI as members commit to implement the Global Workplace Standard for Mica Processors or to support the implementation of the same Standard along their mica supply chain. The Responsible Mica Initiative has a clear double role in this process: first, to accompany the actors of the mica supply chain in the implementation of the standard through the development of concrete tools and day-to-day handholding support and second, to confirm RMI members are respecting the commitments they took when joining the initiative.

Where this commitment may seem abstract, this Mica Sourcing Philosophy and Guidelines document aims to provide concrete guidelines to RMI members when it comes to implementing or supporting the implementation of the Standard along their mica supply chain. Therefore, this document shall be used in conjunction with the Global Workplace Standard for Mica Processors.

3. RMI’s sourcing philosophy

The Responsible Mica Initiative has been created on the conviction that all stakeholders along the mica supply chain are sharing responsibilities in improving the living and working conditions of all people along the same supply chain.

Hence the commitment taken by all members of the initiative:

- For mica processors, to implement the Global Workplace Standard for Mica Processors,
- For downstream actors (from intermediary products manufacturers to brands), to identify mica processors that belong to their mica supply chain thanks to supply chain mapping and to support the implementation of the Standard at their factories (concrete guidelines are given in the hereby document),
- For other members of the initiative, to make good use of their resources in the support of the Standard at mica processing units.

The global vision of the Responsible Mica Initiative is to witness a world where mica supply chains are fair, responsible and sustainable and believes that implementation of the right means and engagement of the relevant resources will enable to reach that vision. However, RMI is aware that specificities associated with particular local contexts may hinder to some extent the progress toward the improvement of mica supply chains. RMI therefore supports a progressive approach, focused on the continuous improvement rather than immediate compliance. Engaged means and resources should cope with these local specificities.

4. Supporting tools and resources toward the implementation of responsible workplace practices

1. For India

RMI developed a set of tools available to all members and outside the initiative to support the implementation of responsible workplace practices:

Tool	Users	Content and aim
Global Workplace Standard for Mica Processors	Available to anybody	It is the reference document defining the standards to be met by mica processors in all countries
National Guidance ¹	Available to anybody, intended to be used especially by mica processors and auditing companies	It is the document that “translates” the Global Workplace Standard for Mica processor in the local context, taking into account local regulations and providing concrete steps to mica processors in implementing the Standard
Audit checklist (or Audit grid)	Available to anybody, intended to be used especially by mica processors and auditing companies	It is the document that lists all the criteria of the Global Workplace Standard for Mica Processor and is used during an audit to record the level of compliance of the audited company with regards to each and every criterion. The audit checklist includes criticality levels for each of the Standard’s criterion.

¹ As of April 2021, a National Guidance and an audit checklist have been developed for India. Same documents for Madagascar are planned over 2021-2022.

Training sessions	Available to all mica processors (free of charge for RMI members - a symbolic fee is charged to non RMI members) Training sessions are destined both to managers and workers	Every year, several sessions are set up and facilitated by RMI Executive Team, in Koderma and / or Giridih. Trainings' content covers all aspect of the Global Workplace Standard for Mica Processors. Some sessions are dedicated to managers, others to workers, some are for all workforces. A calendar of training sessions is regularly updated by RMI Executive Team and shared with all members.
e-resource center	Available to RMI members, especially for the use of mica processors (both managers and workers), free of charge	The e-resource center gathers all e-trainings developed by the initiative. E-trainings aim to complement training sessions detailed above.
Online self-assessment tool	Available to mica processors that are RMI members, free of charge	The online self-assessment tool aims to regularly follow up the progress made by RMI member mica processors with regards to the compliance against the Global Workplace Standard. The regular follow up is then of great help to RMI Executive Team to bring a handholding support to the mica processors in the implementation of the Standard.
RMI Mica Sourcing Philosophy and Guidelines	Available to anybody	The hereby document aims to detail RMI philosophy with regards to mica sourcing. As well, it provides concrete guidelines for all members to implement the Standard, or to support its implementation in their mica supply chains.

In addition to these tools, RMI's Executive Team has been reinforced with the hiring of a Supply Chain Officer, based in Jharkhand, India, to support mica processors in implementing the Standard.

These tools are described in the Assessment Procedure document.

2. For Madagascar

Similar tools will be developed for stakeholders involved in the mica supply chain in Madagascar over 2021-2022.

5. Guidelines to mica processors

The Responsible Mica Initiative positions itself as a supporting body to all mica processors that are members of the initiative and to all mica processors that are part of RMI members' supply chain. RMI aims to ensure that all tools and support are easily accessible to all mica processors.

Mica processors have access to all of the above tools to support them in implementing the Standard. Whereas most of the tools are accessible at no cost to anybody (see the table in the

previous paragraph), access to all tools is free of charge for RMI members and a modest fee shall be paid by mica processors that are not members of the initiative.

Mica processors will find all relevant information about concrete guidelines to implement the Standard in the National Guidance. They can also contact RMI Supply Chain Officer at any time to discuss a particular point of the Standard.

The Responsible Mica Initiative favors transparency along the mica supply chain. Hence, following an onsite audit of a processor against the Global Workplace Standard for Mica Processors, RMI warmly encourages the owner of the audit report (usually the organizations that have paid for the audit) to allow the auditee to share the results outside its own organization.

6. Guidelines to downstream members

1. Engage rather than boycott

The Responsible Mica Initiative has been founded on the conviction that systemic issues as the ones encountered by mica-dependent communities are linked to a shared responsibility among different stakeholders (private sector, Governments, CSOs), and can only be solved thanks to a joint action to be carried out locally.

That founding conviction demands a first commitment to companies purchasing or using mica coming from high-risk countries: to keep purchasing or using mica coming from those same countries, and to not divert mica sourcing to other so-called “safer countries”.

Leaving a high-risk country has a direct harmful consequence: the elimination of one key source of revenue for mica-dependent households, which is often the most important or even only one, therefore leading to an important economic and social crisis.

As well, and parallelly not to divert mica sourcing to “safer countries”, RMI highly recommends that organizations which are already using / purchasing natural mica from a high-risk country do not substitute natural mica by any “safer” material. Not only replacing natural mica sourced in a high-risk country by any substitute has the same consequence of eliminating a major source of revenue for mica-dependent households but some substitutes may have similar or equivalent adverse impacts on people or the environment. When substituting natural mica coming from a high-risk country by any other material is considered, RMI recommends to properly assess the overall CSR impact of the substitute material, including on people and environment. For example, other alternatives may also require raw materials coming from mines as part of its production process (quartz, magnesium, potassium, alumina, carbonates, ...) and energy. Raw materials and energy consumption lead to greenhouse gas (GHG) emissions which might be comparatively significantly higher than GHG emissions related to natural mica production, especially when these alternative materials are produced in countries where power sources are carbon intensive.

2. Map mica supply chain and conduct a proper due diligence to know what at stake

As part of the commitments taken by the members, but more broadly to all organizations using or purchasing mica, RMI recommends mapping their mica supply chains, up to the raw material production country.

Mapping mica supply chain enables to

- Identify the stakeholders with whom an organization is sharing responsibilities in improving working conditions upstream,
- Act collectively toward the effective improvement of the mica supply chain,

- Showcase the strength of the collective aiming for change.

In addition to the mapping of their supply chains, the Responsible Mica Initiative warmly recommends to carry out a proper due diligence along the entire supply chain, up to the mining sites, aiming to:

- Identify the risks associated with the actors along the entire supply chain up to the mining sites (e.g. child labor)
- Assess the identified risks (e.g. child labor is unacceptable)
- Design mitigation measures to cope with identified risks (e.g. map the supply chain, support the implementation of the standard)
- Monitor the progress following the implementation of mitigation measures
- Regularly report on the results of the above process (as part of public sustainability reports and internally within RMI)

Throughout the process, RMI remains at its members' disposal to accompany them in the whole process.

3. Engage your suppliers toward transparency, responsibility sharing and action

Parallel to supply chain mapping, downstream members are committing to support the implementation of the Global Workplace Standard upstream of their organization's supply chain. To do so, RMI recommends the following actions to downstream members:

- With non-RMI members upstream actors, engage directly with them and invite them to join RMI as members - they will then benefit from a handholding support brought by RMI in the implementation of the Standard,
- With all upstream actors (RMI members or not), regularly ensure that resources and tools are known and used:
 - o Share the training session calendar when it is updated and shared by RMI Executive Team (training session calendar is prepared by RMI Executive Team and shared with all members every time it is updated).
 - o Share the e-resource center link and regularly check whether mica processors are taking part to e-training sessions.
 - o Share the contact info of RMI Supply Chain Officer.

Organizations located right after processors (their direct customers) are encouraged to set up conference calls with their mica suppliers to address the following topics:

- Mica related issues in high-risk countries and how to mitigate them,
- Implementation of the Global Workplace Standard for Mica Processors - experience sharing,
- Supply chain mapping and transparency along the supply chain, up to mines / collection sites.

For such conference calls, RMI Executive Team remains at members' disposal to participate to the calls.

As well, more downstream members are encouraged to set up conference calls with their suppliers of mica containing products. Such calls could be dedicated to mica and have the following objectives:

- Awareness raising about mica-related issues,
- Concrete ways of action toward the improvement of the mica supply chain (participation of the collective audit protocol, supply chain mapping, direct support...).

For such conference calls, RMI Executive Team remains at members' disposal to participate to the calls.

RMI recommends to its members to develop criteria when selecting new suppliers. Below are a few topics that could be covered by such criteria:

- Ability to determine the origin of mica (raw or contained in an intermediary / finished product),
- As much as possible, minimize the number of intermediaries along the supply chain,
- Supplier's willingness to participate to supply chain's transparency (and sharing mica sourcing information - name of its own suppliers, country of origin of purchased mica),
- Supplier's commitment to the improvement of working conditions throughout the supply chain (through RMI membership or any other means / initiative),
- Supplier's willingness to welcome a team for a site visit,
- In case the supplier is already a member of RMI, its willingness to participate to RMI's collective audit protocol,
- The willingness to be audited at least once a year (*the annual frequency is the one recommended by RMI and may vary from a member to another*),
- In case the supplier is a mica processor:
 - o Supplier's willingness / commitment to implement the Global Workplace Standard for Mica Processors,
 - o Supplier's willingness to be audited by a third party against the Global Workplace Standard for Mica Processors,

Should it be decided to make these criteria be coercive, a progressive approach is recommended with the definition of 'preferred' criteria and 'mandatory' ones.

RMI recommends participating in RMI's collective audit protocol which not only lowers cost and time burden on all participants but also creates trust and a collective dynamic toward the improvement of the mica supply chain.

Finally, RMI suggests the two below leads to downstream members to engage the processors belonging to their mica supply chain to implement the Global Workplace Standard for Mica Processor:

- Instore a trust relationship with tier-1 to tier-xx suppliers to ensure the right chain of custody.
- Hold suppliers accountable for the implementation of the Standard.

4. Quantitatively assess responsible mica volumes

RMI recommends setting up a continuous process aiming to quantitatively assess mica volumes provided by suppliers that are compliant with Global Workplace Standard for Mica Processors. The objectives of such tool could be to:

- Assess the volumes of mica that are purchased by the organization on a yearly basis,
- Ensure that the data you received throughout this process are reliable,
- Assess the share of these volumes compliant with the Global Workplace Standard,
- Maximize the share of compliant volumes of mica, aiming for 100% compliance.

5. Instore an accessible grievance mechanism

RMI recommends to instore a grievance mechanism accessible and known to all third parties (CSOs, commercial partners like suppliers and sub-contractors, associations, customers...) and managed by duly authorized personnel working under a strict non-disclosure agreement.

Such grievance mechanism could be then used to declare any irregularity or contravention such as child labor, unacceptable working conditions, unfair trading, corruption or any other act that may be contrary to RMI's vision and mission.

Should such grievance mechanism be in place, all reports shall be analyzed and remediation measures implemented.

6. Scale up at the group's level

Where the downstream member is an affiliate or a parent company, part or head of an industrial group where several affiliates are purchasing / using mica, RMI recommends scaling up the present guidelines to all affiliates of the group purchasing / using mica.

7. Speak up toward change

RMI recommends that organizations create a public position regarding mica and aligned with RMI's vision and mission. This position might then be shared proactively (in Industry forums, CSR thematic forums, toward Governments and Institutions, ...) to raise awareness about mica-related systemic issues, ways that can be undertaken to solve them, and call for action.