RMI Auditor Quality Assurance and Integrity Framework

1. Purpose

This framework establishes how the Responsible Mica Initiative (RMI) ensures the competence, integrity, and consistency of all auditors conducting assessments against all RMI standards:

- the [Global Workplace Standard](#) (GWS) for mica sorting sites
- the MICA CRAFT CODE for ASM (artisanal small-scale miners)
- the Global Workplace Standard (GWS) for small to medium semi-mechanised mines

The framework defines the systems through which RMI approves, monitors, and continuously improves audit quality to uphold credibility, reliability, and data integrity across the mica supply chain. The framework aligns with ISEAL Codes of Good Practice and the EU Corporate Sustainability Due Diligence Directive (CSDDD).

2. Alignment with the EU Corporate Sustainability Due Diligence Directive (CSDDD)

The RMI Auditor Quality Assurance and Integrity Framework supports compliance with the EU Corporate Sustainability Due Diligence Directive (CSDDD) by strengthening the credibility and reliability of audit-based due diligence.
 It directly contributes to the implementation of key CSDDD requirements, including:

- **Article 5** – Establishing and integrating due diligence processes through a structured and verified audit system;
- **Article 10** – Monitoring the effectiveness of due diligence measures via accredited auditors, integrity controls, and continuous evaluation;
- **Article 11** – Ensuring transparent communication and traceability of results through the Tilkal platform;
- **Recital 34 and future EU guidance** – Meeting expected "fitness and integrity criteria" for audits and auditors.

3. Scope

This framework applies to all entities and activities involved in the implementation, oversight, and continuous improvement of the RMI audit system. Specifically, it covers:

- **All auditing agencies accredited by RMI**, which are authorised to conduct audits in accordance with RMI's standards.
- **All individual auditors approved by RMI,** including lead auditors and supporting auditors, who are responsible for carrying out audits under RMI's methodology and ethical requirements;
- **All audits performed under RMI's standards**, including full audits, re-audits, and verification audits conducted within RMI's membership or assurance programmes;
- **RMI's internal audit integrity and data management systems**, encompassing the mechanisms for audit data verification, result sharing, report review, and continuous improvement of audit quality and transparency.

Together, all these components ensure that every aspect of RMI's audit process — from auditor qualification to data governance — upholds the highest standards of credibility, consistency, and accountability.

4. Principles of Audit Integrity

Aligned with the **ISEAL Credibility Principles** and **global audit integrity good practices,** all RMI audits shall be guided by the following core principles that underpin credibility, consistency, and trust in the RMI assurance system:

Independence   and   Impartiality
Auditors must act objectively, free from any external influence, bias, or conflict of interest that could compromise their professional judgment. RMI ensures independence through clear separation between auditing functions, auditees, and commercial interests, as well as through strict conflict-of-interest declarations and integrity oversight mechanisms.

Competence   and   Fitness
Auditors must possess the necessary technical qualifications, contextual understanding, and professional experience to assess compliance with RMI's standards. RMI-approved auditors undergo formal training, periodic proficiency assessments, and continuous learning to maintain the highest level of competence and credibility.

Accountability and Transparency
All audit activities, findings, and decisions must be fully documented, traceable, and open to review. Audit results are communicated in a clear and evidence-based manner, allowing processors, members, and other stakeholders to understand outcomes and follow up on corrective actions. RMI's data management system ensures transparent traceability of all audit information through the Tilkal platform.

Integrity and Ethical Conduct
Auditors and auditing agencies must adhere to the RMI Code of Ethics for Auditors and Auditing Agencies and uphold the highest standards of professional integrity. This includes honesty in reporting, respect for confidentiality, and ethical interaction with workers, management, and other stakeholders during audits.

Misrepresentation, coercion, or falsification of information is strictly prohibited and subject to disciplinary action.

Continuous   Improvement   and   Learning
The audit process is designed not only to verify compliance but also to promote systemic improvement. RMI and its accredited auditors are committed to learning from each audit cycle, integrating feedback, updating training content, and refining tools and methodologies. This ongoing learning culture ensures that the audit system evolves in line with emerging best practices, regulatory expectations (such as the EU CSDDD), and stakeholder feedback.

As part of this framework, RMI establishes the following procedures and activities to ensure alignment with global audit assurance expectations :

- Oversight of quality audit reports
- Investigation and escalation of integrity concerns
- Oversight of continuous auditor performance review
- Coordination of auditing agencies and external integrity partners

5. Auditor Accreditation and Competence

5.1 Accreditation process

The RMI has a structured recruitment process to ensure that only qualified, independent, and ethical auditing agencies and auditors are approved to conduct audits for RMI standards. The process ensures transparency, competence, and integrity at every stage.

RMI publishes a request for proposals inviting qualified auditing agencies to apply for accreditation, requiring them to demonstrate competence, independence, and relevant experience. The RMI Team reviews all application forms submitted to verify the eligibility criteria as outlined in section 5.1.1 and 5.1.2

After review of audit agency submission, RMI issues a decision and, if approved, adds the agency and its nominated auditors to the publicly available RMI Accredited Auditor List.

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Accreditation remains valid as long as the agency upholds RMI's quality and integrity standards, completes periodic training, and maintains ethical compliance.

Only RMI-accredited agencies and approved auditors may conduct RMI standard audits. Accreditation is granted based on:

- Selection based on the a forementioned criteria in section 5.1.1 and 5.1.2
- Completion of mandatory RMI training
- Ethical declaration of independence and adherence to the RMI Code of Ethics
- Signed declaration of independence, with no conflict of interest with RMI members or auditees.

5.1 Eligibility Criteria

5.2.1 Accreditation criteria for agencies

The following criteria are reviewed for eligibility of auditing agencies:

- Must be a legally registered entity authorized to perform audit activities.
- Demonstrated experience in ESG, labour, health & safety, and human rights audits, preferably within mineral or manufacturing sectors.
- Proven understanding of responsible sourcing and due diligence frameworks such as the OECD Due Diligence Guidance and EU regulations.
- Independence and impartiality ensured through clear conflict-of-interest declarations and no prior consultancy with auditees.
- Capacity to conduct audits in the mica supply chain context, including knowledge of local regulations, labour laws, and operational realities.
- Adequate organizational capacity and quality control systems to manage multiple audits and ensure report reliability.
- Established internal system for auditor recruitment, training, and supervision.
- Commitment to comply with the RMI Code of Ethics and all integrity and confidentiality requirements.
- Ability to operate effectively in remote or sensitive areas, with cultural and language competence.
- Willingness to participate in RMI's training and continuous improvement programme (e.g., refresher training, witness audits, calibration meeting).

5.2.2 Accreditation criteria for individual auditors (within the accredited auditing agency)

The following criteria are reviewed for eligibility of individual auditors:

- Must be affiliated with an RMI-eligible auditing agency.
- Hold a recognized professional auditor accreditation, such as APSCA (Associate or Certified Level), or an equivalent qualification in social or environmental auditing.
- Demonstrated technical competence and experience in conducting social, environmental, or human rights audits.
- Successful completion of RMI's mandatory auditor training and examination
- Strong knowledge of RMI standards and local labour, safety, and environmental requirements.
- Proven ability to conduct worker interviews and stakeholder engagement respectfully and effectively.
- Adherence to confidentiality and data protection principles when handling audit information.
- Participation in RMI's annual refresher training and ongoing capacity-building activities.

6. Continuous Improvement and Integrity Oversight for Auditors

To maintain audit excellence and consistency, RMI requires auditing agencies and auditors to commit the necessary resources to RMI's quality assurance processby committing to:

- **Initial Training and Examination:**
  Each auditing agency shall nominate the selected auditors for a **2-day in-person training programme (per standard)**, to ensure competence in RMI's standards and audit methodology.
- **Yearly Refresher training :**
  Every year, auditors must complete:
  - a Refresher Training Programme, which includes an online refresher quiz to ensure sustained competence and alignment with the latest RMI procedures and standards.
  - Any ad hoc topic specific training that RMI deems relevant
- **External Integrity Oversight (external body):**
  RMI engages an external party as a global integrity partner to perform two key oversight activities:
  - Audits of auditing companies' internal systems and processes; and
  - Witness audits to verify field-level audit quality and consistency.
- **Independent Oversight by RMI:**
  A RMI colleague conducts shadow audits to further validate the quality and reliability of accredited agencies' audit practices.
- **Systematic Desk Reviews of Audit Reports**:
  The RMI teams perform systematic quality report checks to ensure accuracy, consistency, and adherence to reporting protocols.
- **Yearly performance review and feedback session** with individual auditing agencies
- **Yearly Collective Calibration meetings**:
  On an annual basis, auditors are required to participate in periodic calibration meetings organized by RMI to ensure consistency, alignment, and continuous improvement across all audits. These sessions aim to harmonize interpretation of RMI's standards, scoring of findings, and reporting practices among all accredited auditors.

These requirements reflect RMI's dedication to continuous professional development, quality control, and integrity assurance across the auditing network.

7. Disciplinary, Escalation and Grievance Mechanisms

RMI is committed to upholding the highest standards of integrity, professionalism, and accountability across its audit system. To maintain confidence in the credibility of RMI audits, clear and transparent mechanisms are established to address any breaches of conduct, competence, or quality, as well as to provide a structured channel for stakeholders to raise integrity or performance concerns.

The disciplinary and escalation process ensures that all issues — whether identified internally or reported externally — are handled promptly, impartially, and proportionately, with outcomes that reinforce learning and continuous improvement. It also guarantees that all affected parties have the opportunity to be heard, respond, and appeal before final decisions are made.

Through these mechanisms, RMI promotes a culture of fairness, responsibility, and continuous enhancement in its audit network, ensuring that both auditors and auditing agencies consistently uphold RMI's ethical, professional, and quality expectations.

Breaches of integrity or competence result in immediate review and possible sanctions, including retraining, suspension, or de-accreditation of auditing companies. Severe misconduct triggers escalation to the RMI Board for decision and corrective actions.

7.1 Grievance Mechanism for Integrity and Quality Issues

RMI provides an accessible and confidential grievance mechanism to allow any stakeholder — including audited processors, workers, local communities and RMI members — to raise concerns related to:

- Auditor integrity or professional conduct;
- Quality or accuracy of audits and reports;
- Misuse of information or breaches of confidentiality;
- Perceived bias, unfair treatment, or procedural non-compliance during an audit.

Stakeholders may submit grievances through RMI's **Grievance Mechanism** by filling out the form or sending an email to the dedicated email address grievances@responsible-mica-initiative.com

.All grievances are logged, acknowledged within 10 working days, and investigated independently by whom?

Where relevant, outcomes may include:

- Corrective or preventive measures (e.g., retraining or additional shadow audits);
- Temporary suspension or de-accreditation of auditors or agencies;
- Mediation or clarification with the complainant and relevant parties;
- Escalation to the RMI Board for serious or unresolved cases.

RMI guarantees confidentiality and protection from retaliation for any individual or organisation submitting a grievance in good faith. Findings and resolutions are documented and periodically reviewed to improve audit integrity and stakeholder trust.

8. Alignment with Global Standards

This framework aligns with:

- ISEAL Code of Good Practice for Sustainability Systems;
- ISEAL Assurance Code (Version 2.0);
- EU Corporate Sustainability Due Diligence Directive (CSDDD);
- OECD Due Diligence Guidance for Responsible Supply Chains;
- ISO 19011 Guidelines for Auditing Management Systems.