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# Smelters of Interest

Certified B Corporation

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# Introduction: Identifying Smelters of Interest

Smelters and refiners (SORs) are an essential part of the mineral supply chain. They are considered "pinch points" for responsible mineral sourcing, as they represent the last viable point for determining the country source of origin of the minerals in a supply chain.

Manufacturers must be aware of smelters that present risk in their supply chains, per the recommendations of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.[1]

As part of their due diligence efforts, manufacturers that purchase materials from SORs should examine industry-recognized audits/assessments to determine whether a smelter is compliant with respective responsible sourcing standards. These audits/assessments provide a due diligence trail, mitigating the risk of inadvertently sourcing minerals from conflict areas.

Due diligence does not end with audit participation. Other factors companies must take into consideration when assessing smelters in a supply chain include:[2]

- Tin, tantalum, tungsten, gold, cobalt, mica, copper, or nickel originating in or transported through a conflict-affected or high-risk area
- Suppliers or other known upstream companies operating in, or with interests in, conflict-affected areas
- Suppliers or other upstream companies known to have sourced minerals from a conflict-affected area in the last 12 months
- Anomalies or unusual circumstances identified through collected data that raise reasonable suspicion that minerals may contribute to conflict or human rights violations through their extraction, transport, or trade

In addition to providing information on risk criteria, this guide objectively lists smelters of interest, based on the documented presence of risk factors.

[1] OECD. (2016). *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition.* https://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-Guidance-Minerals-Edition3.pdf
[2] OECD. (2016). *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition.* https://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-Guidance-Minerals-Edition3.pdf

# Awareness Factors

The scoring criteria for this list are based on risk factors that conform to the publicly accessible OECD Due Diligence Guidance, and the listed facilities are supported by credible sources. The following areas were taken into account when determining these smelters of interest:

## Geo-Risk

Geo-risk considers whether the minerals originated from, or were transited through, a conflict-affected or high-risk area, such as the Democratic Republic of the Congo (DRC) and its nine adjoining countries.[3]

## Audit-Related Risk

Audits help ensure that sourcing practices align with the OECD Due Diligence Guidance. It considers participation in programs such as Responsible Minerals Assurance Process (RMAP) audits, or a cross-recognized initiative.[4] These programs help determine which smelters and refiners can validate their sourcing as conflict-free or responsibly sourced.

## Peer Assessment

Data from public filings provides valuable information on the smelter assessments conducted by credible third-party sources. These assessments may indicate red flags, as defined by the OECD Due Diligence Guidance.[5]

## Sourcing Risk

Sourcing risk evaluates evidence of any area of concern (e.g., ESG-related issues) supported by credible sources and denied parties lists (**sanctions**).

**Based on the above scoring schema, companies should be aware of the following facilities to better identify and assess risks to their business.**

[3] Securities and Exchange Commission. (2012). *Final Rule: Conflict Minerals*. https://www.sec.gov/rules/final/2012/34-67716.pdf
[4] Responsible Minerals Initiative. (n.d.). *Responsible Minerals Assurance Process*. http://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/
[5] U.S. Securities and Exchange Commission. (n.d.). *EDGAR Company Filings*. https://www.sec.gov/edgar/searchedgar/companysearch.html

# Smelters of Interest

## Conflict Minerals Smelters (Tin, Tungsten, Tantalum, Gold)

## Gold Refiners

### African Gold Refinery Limited (AGR) – CID003185

**Location:** Uganda (Covered Country)
**Mineral:** Gold

#### Geo Risk

- This smelter is located in Uganda, an adjoining country to the DRC, a covered country under the Dodd-Frank Act.

#### Audit Risk

- **Under due diligence review.**
  - This smelter is under review by the Responsible Minerals Initiative (RMI) and cannot participate in the RMAP audit program.

#### Sourcing Risk

- The U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) added the smelter African Gold Refinery (AGR) to its sanctioned entity list, in addition to a network of other companies tied to Alain Goetz, who has been sanctioned.[6]
  - According to the Department of the Treasury, the AGR was designated pursuant to Executive Order 13413 for being responsible for, or complicit in, or having engaged in, directly or indirectly, supporting people, including armed groups, involved in activities that threaten the peace, security, or stability of the DRC, or that undermine democratic processes or institutions in the DRC, through the illicit trade in the DRC's natural resources.[7]
  - A letter from a group of experts to the UN Security Council on the DRC advised that the AGR was uncooperative with their investigation. They cited independent sources claiming AGR was "reluctant to disclose the names of their suppliers because they were aware that their activities were not always legal."[8]

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[6] U.S. Department of the Treasury. (2022). *Treasury Sanctions Alain Goetz and a Network of Companies Involved in the Illicit Gold Trade.* https://home.treasury.gov/news/press-releases/jy0664
[7] U.S. Department of the Treasury. (2022). *Treasury Sanctions Alain Goetz and a Network of Companies Involved in the Illicit Gold Trade.* https://home.treasury.gov/news/press-releases/jy0664
[8] United Nations Security Council. (2018, December 18). *Letter dated 18 December 2018 from the Group of Experts on the Democratic Republic of the Congo addressed to the President of the Security Council.* https://www.securitycouncilreport.org/atf/cf/%7B65BFCF9B-6D27-4E9C-8CD3-CF6E4FF96FF9%7D/s_2018_1133.pdf

- The European council added eight additional individuals, including Alain Goetz (the beneficial owner and former director of AGR) to the DRC sanctions list.[9]
    - The Sentry reported "they welcomed the decision of the EU to sanction Goetz and protect the Union from being misused for illicit gold trade and sanction evasion."[10]
    - "The announcement further includes mention of Goetz's exploitation of the "armed conflict, instability and insecurity in the DRC" through his connections with non-governmental armed groups involved in destabilizing activities."
- Experts at the UN Security Council stated that "a large part of the gold traded by Uganda and Rwanda is sourced fraudulently from neighboring countries, including the Democratic Republic of the Congo."[11]
- According to The Wall Street Journal: "On two early-March flights, at least 7.4 tons of gold with a market value over $300 million moved from Venezuela to a refinery in Uganda."[12]
    - "The gold that arrived in Entebbe passed through African Gold Refinery Ltd. in a compound about 500 yards from the old runway before being exported to the Middle East."[13]
    - "AGR's general manager says the company hasn't processed smuggled or conflict gold and declines to comment on the March shipments. She says all AGR's business is legal and that in a March 26, 2019, management meeting it agreed it won't accept transactions related to Venezuela."[14]
    - The U.S. Department of the Treasury sanctions on Venezuela: "(E.O.) 13850 of November 1, 2018 authorizes the imposition of sanctions on persons operating in Venezuela's gold sector."[15]
- Human Rights Watch reported that "Gold mining has led repeatedly to serious human rights violations ... in the Philippines, Papua New Guinea, Ghana, Mali, Nigeria, Tanzania, Uganda, and Eritrea."[16]
- According to available RCOI data, this smelter sources from the DRC.

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[9] European Council. (2022, December 8). *Democratic Republic of the Congo: EU renews restrictive measures and adds eight additional individuals.* https://www.consilium.europa.eu/en/press/press-releases/2022/12/08/democratic-republic-of-the-congo-eu-imposes-restrictive-measures-on-eight-additional-individuals/

[10] The Sentry. (2022, December 12). *EU Sanctions Goetz for Illicit Gold Trade.* https://thesentry.org/2022/12/08/7520/breaking-eu-sanctions-goetz-illicit-gold-trade/

[11] Group of Experts on the Democratic Republic of the Congo. (2018, June). *Letter from the Group of Experts on the Democratic Republic of the Congo addressed to the President of the Security Council.* https://reliefweb.int/sites/reliefweb.int/files/resources/N1812836.pdf

[12] Steinhauser, G., & Bariyo, N. (2019, June 19). How 7.4 Tons of Venezuela's Gold Landed in Africa—and Vanished. *The Wall Street Journal.* https://www.wsj.com/articles/how-7-4-tons-of-venezuelas-gold-landed-in-africaand-vanished-11560867792

[13] Steinhauser, G., & Bariyo, N. (2019, June 19). How 7.4 Tons of Venezuela's Gold Landed in Africa—and Vanished. *The Wall Street Journal.* https://www.wsj.com/articles/how-7-4-tons-of-venezuelas-gold-landed-in-africaand-vanished-11560867792

[14] *Steinhauser, G., & Bariyo, N. (2019, June 19).* How 7.4 Tons of Venezuela's Gold Landed in Africa—and Vanished. *The Wall Street Journal. https://www.wsj.com/articles/how-7-4-tons-of-venezuelas-gold-landed-in-africaand-vanished-11560867792*

[15] U.S. Department of the Treasury. (2018, November 2). *Executive Order 13850 of November 1, 2018.* https://www.treasury.gov/resource-center/sanctions/Programs/Documents/venezuela_eo_13850.pdf

[16] Kippenberg, J. (2018, March 21). *Jewelers, Take Responsibility! Watchmakers at Baselworld Should Reveal Where Their Gold Is From and What They Do to Protect Human Rights. Human Rights Watch.* https://www.nytimes.com/2018/06/28/us/politics/state-human-trafficking-report-migrants.html

# AU Traders & Refiners – CID002850

**Location:** South Africa
**Mineral:** Gold

## Geo Risk

- This SOR is located in a country with moderate risks related to the transfer and sale of minerals, particularly those from conflict-affected and high-risk areas, including the DRC and its adjoining countries.

## Audit Risk

- **Non-conformant.**
    - This SOR is non-conformant with the RMAP audit program.
- As of May 2021, this smelter is no longer on the Responsible Jewellery Council (RJC)'s Member Registry.

## Sourcing Risk

- According to available RCOI data, this smelter sources from the DRC.

# Emirates Gold DMCC – CID002561

**Location:** United Arab Emirates
**Mineral:** Gold

## Geo Risk

- This SOR is located in a country with moderate risks related to the transfer and sale of minerals, particularly those from conflict-affected and high-risk areas, including the DRC and its adjoining countries.

## Audit Risk

- **Non-conformant.**
    - This SOR is non-conformant with the RMAP audit program.

## Sourcing Risk

- Emirates Gold DMCC, which has refined and manufactured gold in the Gulf commercial hub for more than three decades, has been suspended from the UAE Good Delivery list of approved refineries, according to an official document available on the UAEGD website.[17]
- The London Bullion Market Association (LBMA) suspended the company's affiliate membership due to the outcome of the recent LBMA due diligence review.[18]
- According to available RCOI data, this smelter sources from the DRC.

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[17] Dempsey, H, Kerr, S, & Cotterill, J. (2023, July 14). Emirates Gold suspended from UAE and UK bullion markets. *Financial Times*. https://www.ft.com/content/065f07bc-586a-4ea9-81d6-8f0ab1228f11
[18] LBMA. (2023, July 14). *Emirates Gold — Affiliate Membership Suspended.* https://www.lbma.org.uk/articles/emirates-gold-affiliate-membership-suspended

# Fidelity Printers & Refiners Ltd. — CID002515

**Location:** Zimbabwe
**Mineral:** Gold

## Geo Risk

- This SOR is located in a country that can be considered a conflict-affected or high-risk area in the mineral supply chain.

## Audit Risk

- **Under due diligence review.**
  - This smelter is under review by the RMI and cannot participate in the RMAP audit program.

## Sourcing Risk

- This SOR facilitated the money-laundering scheme involving the Zimbabwean government smuggling gold out of the country to avoid western sanctions.[19]
- According to available RCOI data, this smelter sources from the DRC.

# Gasabo Gold Refinery Ltd. — CID005006

**Location:** Rwanda
**Mineral:** Gold

## Geo Risk

- This SOR is located in a country that can be considered a conflict-affected or high-risk area in the mineral supply chain.

## Audit Risk

- **Under due diligence review.**
  - This smelter is under review by the Responsible Minerals Initiative (RMI) and cannot participate in the RMAP audit program.

## Sourcing Risk

- This SOR is located in a conflict-affected or high-risk area (CAHRA) and a Dodd-Frank covered country.
- This smelter has been sanctioned by the Council of the European Union for illegally importing gold from M23 rebel group controlled areas of the Democratic Republic of the Congo.[20]

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[19] Al Jazeera. (2023, March 30). How Zimbabwe uses gold smuggling to evade sanctions choke. https://www.aljazeera.com/news/2023/3/30/how-zimbabwe-uses-gold-smuggling-to-evade-sanctions-choke

[20] EUR-Lex. (n.d.). *Council Implementing Regulation (EU) 2025/509 of 17 March 2025 implementing Regulation (EC) No 1183/2005 concerning restrictive measures in view of the situation in the Democratic Republic of the Congo*. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202500509

# GGC Gujarat Gold Centre Pvt. Ltd. – CID002852

**Location:** India
**Mineral:** Gold

## Geo Risk

- This SOR is located in a country with moderate risks related to the transfer and sale of minerals, particularly those from conflict-affected and high-risk areas, including the DRC and its adjoining countries.

## Audit Risk

- **Non-conformant.**
  - This SOR is non-conformant with the RMAP audit program.

## Sourcing Risk

- According to available RCOI data, this smelter sources from a conflict-affected and high-risk area (CAHRA).

# Gold Refinery of Zijin Mining Group Co. Ltd. – CID002243

**Location:** China
**Mineral:** Gold

## Geo Risk

- This SOR is located in a country with moderate risks related to the transfer and sale of minerals, particularly those from conflict-affected and high-risk areas, including the DRC and its adjoining countries.

## Audit Risk

- **Conformant.**
  - This SOR is conformant with the RMAP audit program.

## Sourcing Risk

- As of January 15, 2025, this smelter has been added to the U.S. Department of Homeland Security's UFLPA Entity List. This smelter still retains its good delivery status with the London Bullion Market Association, but now this smelter creates a high risk of forced labor in the supply chain.[21]

[21] DHS UFLPA entity list https://www.dhs.gov/uflpa-entity-list

# JSC Ekaterinburg Non-Ferrous Metal Processing Plant – CID000927

**Location:** Russian Federation
**Mineral:** Gold

## Geo Risk

- This SOR is located in Russia, a country currently subject to international sanctions due to the ongoing conflict with Ukraine, resulting in the suspension of RMAP audits.

## Audit Risk

- **Under due diligence review.**
  - This smelter is under review by the RMI and cannot participate in the RMAP audit program.

## Sourcing Risk

- Recent market sentiment and consensus are that there is significant uncertainty regarding the Russian Federation, given its social and political instability.
  - The actions of Russian forces during Russia's invasion of Ukraine have led the Ukrainian government and many in the international community to assert the violation of international law.[22]
  - Additionally, the Secretary-General of the UN and the U.S. Secretary of State maintain that the Russian invasion of Ukraine has led to increased human rights violations.[23]
  - The CRS reported that the following conflict-related activities have led the U.S. to maintain sanctions against Russia: malicious cyber-enabled activities and influence operations (including election interference), the use of a chemical weapon, human rights abuses, the use of energy exports as a coercive or political tool, weapons proliferation, illicit trade with North Korea, and support to the governments of Syria and Venezuela.[24]
- Through corporate registry verification and business relationships investigation, smelter JSC Ekaterinburg Non-Ferrous Metal Processing Plant[25] has been identified as holding ties to sanctioned entities/persons.

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[22] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[23] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[24] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[25] U.S. Department of the Treasury. (2022, February 24). *List of Foreign Financial Institutions Subject to Correspondent Account or Payable-Through Account Sanctions (CAPTA List).* https://home.treasury.gov/policy-issues/financial-sanctions/consolidated-sanctions-list-non-sdn-lists/list-of-foreign-financial-institutions-subject-to-correspondent-account-or-payable-through-account-sanctions-capta-list; U.S. Department of the Treasury. (2022, February 24). *U.S. Treasury Announces Unprecedented & Expansive Sanctions Against Russia, Imposing Swift and Severe Economic Costs.* https://home.treasury.gov/news/press-releases/jy0608; U.S. Department of the Treasury. (n.d.). *Specially Designated Nationals List.* https://www.trade.gov/consolidated-screening-list; International Trade Administration. (n.d.). *Consolidated Screening List.* https://www.trade.gov/consolidated-screening-list; European Commission. (n.d.). *Restrictive Measures (Sanctions).* https://ec.europa.eu/info/business-economy-euro/banking-and-finance/international-relations/restrictive-measures-sanctions_en

# JSC Novosibirsk Refinery – CID000493

**Location:** Russian Federation
**Mineral:** Gold

## Geo Risk

- This SOR is located in Russia, a country currently subject to international sanctions due to the ongoing conflict with Ukraine, resulting in the suspension of RMAP audits.

## Audit Risk

- **Under due diligence review.**
    - This smelter is under review by the Responsible Minerals Initiative (RMI) and cannot participate in the RMAP audit program.

## Sourcing Risk

- The LBMA has delisted gold smelter JSC Novosibirsk Refinery from its Good Delivery List.[26]
    - The LBMA made the decision on March 7, 2022, "in light of UK/EU/US sanctions and to ensure an orderly market."[27]
    - This smelter will no longer be accepted as Good Delivery by the London Bullion Market until further notice.[28]
- CME Group alongside its subsidiary, Commodity Exchange Inc. (COMEX), have suspended the approved status for warranting and delivery for gold smelter OJSC Novosibirsk Refinery.[29]
    - CME Group released the statement on March 7, 2022, replicating the decision by the LBMA.[30]
- Recent market sentiment and consensus are that there is significant uncertainty regarding the Russian Federation, given its social and political instability.
    - The Ukrainian government, joined by much of the international community, contends that the actions of Russian forces during Russia's invasion of Ukraine violate international law.[31]
    - The Secretary-General of the UN and the U.S. Secretary of State say that the Russian invasion of Ukraine has led to increased human rights violations.[32]
    - According to a CRS report from January 2022, the U.S. will maintain its sanctions against Russia due to the following conflict-related activities: human rights abuses, the use of a chemical weapon, illicit trade with North Korea, the support of the Syrian and Venezuelan governments, malicious cyber-enabled

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[26] London Bullion Market Association. (2022, March 7). *Good Delivery List Update: Gold & Silver Russian Refiners Suspended.* https://www.lbma.org.uk/articles/good-delivery-list-update-gold-silver-russian-refiners-suspended?
[27] London Bullion Market Association. (2022, March 7). *Good Delivery List Update: Gold & Silver Russian Refiners Suspended.* https://www.lbma.org.uk/articles/good-delivery-list-update-gold-silver-russian-refiners-suspended?
[28] London Bullion Market Association. (2022, March 7). *Good Delivery List Update: Gold & Silver Russian Refiners Suspended.* https://www.lbma.org.uk/articles/good-delivery-list-update-gold-silver-russian-refiners-suspended?
[29] CME Group. (2022, March 7). *Suspension of Approved Status for Warranting and Delivery of Certain Gold and Silver Brands.* https://www.cmegroup.com/notices/market-regulation/2022/03/MKR03-07-22.html
[30] CME Group. (2022, March 7). *Suspension of Approved Status for Warranting and Delivery of Certain Gold and Silver Brands.* https://www.cmegroup.com/notices/market-regulation/2022/03/MKR03-07-22.html
[31] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[32] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704

activities and influence operations (including election interference), the use of energy exports as a coercive or political tool, and weapons proliferation.[33]

- Through corporate registry verification and business relationships investigations, smelter JSC Novosibirsk Refinery has been identified as holding ties to sanctioned entities/persons.

## JSC Uralelectromed – CID000929

**Location:** Russian Federation
**Mineral:** Gold

### Geo Risk

- This SOR is located in Russia, a country currently subject to international sanctions due to the ongoing conflict with Ukraine, resulting in the suspension of RMAP audits.

### Audit Risk

- **Under due diligence review.**
  - This smelter is under review by the RMI and cannot participate in the RMAP audit process.

### Sourcing Risk

- This SOR is listed in the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) Specially Designated Nationals and Blocked Persons list (SDN List).[34]
- The LBMA has delisted gold smelter JSC Uralelectromed from its Good Delivery List.[35]
  - The LBMA made the decision on March 7, 2022, "in light of UK/EU/US sanctions and to ensure an orderly market."[36]
  - This smelter will no longer be accepted as Good Delivery by the London Bullion Market until further notice.[37]
- CME Group alongside its subsidiary, Commodity Exchange Inc. (COMEX), have suspended the approved status for warranting and delivery for gold smelter JSC Uralelectromed.[38]
  - CME Group released the statement on March 7, 2022, replicating the decision by the LBMA.[39]
- Recent market sentiment and consensus are that there is significant uncertainty regarding the Russian Federation, given its social and political instability.
  - The actions of Russian forces during Russia's invasion of Ukraine have led the Ukrainian government and much of the international community to accuse Russia of violating international law.[40]

[33] Congressional Reporting Service. (2022, January 18). *U.S. Sanctions on Russia.* https://sgp.fas.org/crs/row/R45415.pdf
[34] Office of Foreign Assets Control. (2024, August 6). *Sanctions List Search: JOINT STOCK COMPANY URALELEKTROMED.* https://sanctionssearch.ofac.treas.gov/Details.aspx?id=44088
[35] London Bullion Market Association. (2022, March 7). *Good Delivery List Update: Gold & Silver Russian Refiners Suspended.* https://www.lbma.org.uk/articles/good-delivery-list-update-gold-silver-russian-refiners-suspended?
[36] London Bullion Market Association. (2022, March 7). *Good Delivery List Update: Gold & Silver Russian Refiners Suspended.* https://www.lbma.org.uk/articles/good-delivery-list-update-gold-silver-russian-refiners-suspended?
[37] London Bullion Market Association. (2022, March 7). *Good Delivery List Update: Gold & Silver Russian Refiners Suspended.* https://www.lbma.org.uk/articles/good-delivery-list-update-gold-silver-russian-refiners-suspended?
[38] CME Group. (2022). *Suspension of Approved Status for Warranting and Delivery of Certain Gold and Silver Brands.* https://www.cmegroup.com/notices/market-regulation/2022/03/MKR03-07-22.html
[39] CME Group. (2022). *Suspension of Approved Status for Warranting and Delivery of Certain Gold and Silver Brands.* https://www.cmegroup.com/notices/market-regulation/2022/03/MKR03-07-22.html
[40] Congressional Research Service. (2022). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704

- The Secretary-General of the United Nations and the U.S. Secretary of State asserted that Russia's invasion of Ukraine has caused increased human rights violations.[41]
- In January 2022, the Congressional Research Service (CRS) reported that the U.S. will continue its sanctions against Russia due to the following conflict-related activities: malicious cyber-enabled activities and influence operations (including election interference), the use of a chemical weapon, human rights abuses, the use of energy exports as a coercive or political tool, weapons proliferation, illicit trade with North Korea, and support to the governments of Syria and Venezuela.[42]

# Kundan Care Products Ltd. — CID003463

**Location:** India
**Mineral:** Gold

## Geo Risk

- This SOR is located in a country with moderate risks related to the transfer and sale of minerals, particularly those from conflict-affected and high-risk areas, including the DRC and its adjoining countries.

## Audit Risk

- **Outreach required.**
  - This smelter has not engaged with the RMAP audit program.

## Sourcing Risk

- The independent news outlet Ojo Público reported, "[They] identified that the Kundan Group companies have had as suppliers — between 2014 and 2023 — at least six companies linked to illegal mining and people convicted of money laundering."[43]
- According to available RCOI data, this smelter sources from the DRC.

# Kyshtym Copper-Electrolytic Plant ZAO — CID002865

**Location:** Russian Federation
**Mineral:** Gold

## Geo Risk

- This SOR is located in Russia, a country currently subject to international sanctions due to the ongoing conflict with Ukraine, resulting in the suspension of RMAP audits.

## Audit Risk

- **Under due diligence review.**

[41] Congressional Research Service. (2022). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[42] Congressional Research Service. (2022, January 18). *U.S. Sanctions on Russia.* https://sgp.fas.org/crs/row/R45415.pdf
[43] Berríos, M., et al. (2024, April 14). India and the United Arab Emirates: the new destinations for Peruvian dirty gold. *Ojo Público.* https://ojo-publico.com/5070/india-and-united-arab-emirates-new-destinations-peruvian-gold

    - This smelter is under review by the Responsible Minerals Initiative (RMI) and cannot participate in the RMAP audit program.

### Sourcing Risk

- Recent market sentiment and consensus are that there is significant uncertainty regarding the Russian Federation, given its social and political instability.
    - The Ukrainian government, as well as many in the international community, assert that the actions taken by Russian forces during Russia's invasion of Ukraine violate international law.[44]
    - In addition, the Secretary-General of the UN and the U.S. Secretary of State asserted that Russia's invasion of Ukraine has led to increased human rights abuses.[45]
    - According to a January 2022 CRS report, the U.S. will continue its sanctions against Russia due to the following conflict-related activities: the use of a chemical weapon, the use of energy exports as a coercive or political tool, human rights abuses, malicious cyber-enabled activities and influence operations (including election interference), illicit trade with North Korea, support of the Syrian and Venezuelan governments, and weapons proliferation.[46]
- Through corporate registry verification and business relationships investigations, smelter Kyshtym Copper-Electrolytic Plant ZAO[47] has been identified as holding ties to sanctioned entities/persons.
- The RMI has suspended new RMAP assessments in Russia, effective as of September 19, 2022. "This suspension is informed by the RMI's commitment to compliance with all applicable laws and to its broader mission and vision."[48]

## Lingbao Gold Co. Ltd. – CID001056

**Location:** China
**Mineral:** Gold

### Geo Risk

- This SOR is located in a country with moderate risks related to the transfer and sale of minerals, particularly those from conflict-affected and high-risk areas, including the DRC and its adjoining countries.

### Audit Risk

- **Outreach required.**
    - This smelter has not engaged with the RMAP audit program.

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[44] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[45] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[46] Congressional Reporting Service. (2022, January 18). *U.S. Sanctions on Russia.* https://sgp.fas.org/crs/row/R45415.pdf
[47] U.S. Department of the Treasury. (2022, February 24). *List of Foreign Financial Institutions Subject to Correspondent Account or Payable-Through Account Sanctions (CAPTA List).* https://home.treasury.gov/policy-issues/financial-sanctions/consolidated-sanctions-list-non-sdn-lists/list-of-foreign-financial-institutions-subject-to-correspondent-account-or-payable-through-account-sanctions-capta-list; U.S. Department of the Treasury. (2022, February 24). *U.S. Treasury Announces Unprecedented & Expansive Sanctions Against Russia, Imposing Swift and Severe Economic Costs.* https://home.treasury.gov/news/press-releases/jy0608; U.S. Department of the Treasury. (n.d). *Specially Designated Nationals List.* https://www.trade.gov/consolidated-screening-list; International Trade Administration. (n.d.). *Consolidated Screening List.* https://www.trade.gov/consolidated-screening-list; European Commission. (n.d.). *Restrictive Measures (Sanctions).* https://ec.europa.eu/info/business-economy-euro/banking-and-finance/international-relations/restrictive-measures-sanctions_en
[48] RMI. (2022, September 19). *Notice Regarding RMAP Russia-Based Auditees.* https://www.responsiblemineralsinitiative.org/news/notice-regarding-rmap-russia-based-auditees/

## Sourcing Risk

- Referenced in the C4ADS report "Fractured Veins" as the majority shareholder of several mines located in the Xinjiang Uyghur Autonomous Region (XUAR), where the presence of forced labor has been prevalent. These mines may be profiting from the exploitation of forced labor.[49]

# Moscow Special Alloys Processing Plant – CID001204

**Location:** Russian Federation
**Mineral:** Gold

## Geo Risk

- This SOR is located in Russia, a country currently subject to international sanctions due to the ongoing conflict with Ukraine, resulting in the suspension of RMAP audits.

## Audit Risk

- **Under due diligence review.**
  - This smelter is under review by the RMI and cannot participate in the RMAP audit program.

## Sourcing Risk

- The LBMA has delisted gold smelter Moscow Special Alloys Processing Plant from its Good Delivery List.[50]
  - The LBMA made the decision on March 7, 2022, "in light of UK/EU/US sanctions and to ensure an orderly market."[51]
  - This smelter will no longer be accepted as Good Delivery by the London Bullion Market until further notice.[52]
- CME Group alongside its subsidiary, Commodity Exchange Inc. (COMEX), have suspended the approved status for warranting and delivery for gold smelter Moscow Special Alloys Processing Plant.[53]
  - CME Group released the statement on March 7, 2022, replicating the decision by the LBMA.[54]
- Recent market sentiment and consensus are that there is significant uncertainty regarding the Russian Federation, given its social and political instability.
  - The Ukrainian government, in addition to much of the international community, contends that Russian forces' actions during Russia's invasion of Ukraine violate international law.[55]
  - In addition, the Secretary-General of the UN and the U.S. Secretary of State maintain Russian forces' actions during the invasion of Ukraine have led to increased human rights violations.[56]

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[49] C4ADS. (2023, October 11). *Fractured Veins: The World's Reliance on Minerals From the Uyghur Region.* https://c4ads.org/reports/fractured-veins/
[50] London Bullion Market Association. (2022, March 7). *Good Delivery List Update: Gold & Silver Russian Refiners Suspended.* https://www.lbma.org.uk/articles/good-delivery-list-update-gold-silver-russian-refiners-suspended?
[51] London Bullion Market Association. (2022, March 7). *Good Delivery List Update: Gold & Silver Russian Refiners Suspended.* https://www.lbma.org.uk/articles/good-delivery-list-update-gold-silver-russian-refiners-suspended?
[52] London Bullion Market Association. (2022, March 7). *Good Delivery List Update: Gold & Silver Russian Refiners Suspended.* https://www.lbma.org.uk/articles/good-delivery-list-update-gold-silver-russian-refiners-suspended?
[53] CME Group. (2022, March 7). *Suspension of Approved Status for Warranting and Delivery of Certain Gold and Silver Brands.* https://www.cmegroup.com/notices/market-regulation/2022/03/MKR03-07-22.html
[54] CME Group. (2022, March 7). *Suspension of Approved Status for Warranting and Delivery of Certain Gold and Silver Brands.* https://www.cmegroup.com/notices/market-regulation/2022/03/MKR03-07-22.html
[55] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[56] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704

- The CRS reported that the following conflict-related activities have led the U.S. to maintain its sanctions against Russia: malicious cyber-enabled activities and influence operations (including election interference), the use of a chemical weapon, the use of energy exports as a coercive or political tool, human rights abuses, weapons proliferation, illicit trade with North Korea, and supporting the Syrian and Venezuelan governments.[57]

- Through corporate registry verification and business relationships investigation, smelter Moscow Special Alloys Processing Plant[58] has been identified as holding ties to sanctioned entities/persons.

# OJSC, the Gulidov Krasnoyarsk Non-Ferrous Metals Plant (OJSC Krastsvetmet) – CID001326

**Location:** Russian Federation
**Mineral:** Gold

## Geo Risk

- This SOR is located in Russia, a country currently subject to international sanctions due to the ongoing conflict with Ukraine, resulting in the suspension of RMAP audits.

## Audit Risk

- **Under due diligence review.**
  - This smelter is under review by the RMI and cannot participate in the RMAP audit program.

## Sourcing Risk

- The LBMA has delisted gold smelter OJSC, the Gulidov Krasnoyarsk Non-Ferrous Metals Plant (OJSC Krastsvetmet) from its Good Delivery List.[59]
  - The LBMA made the decision on March 7, 2022, “in light of UK/EU/US sanctions and to ensure an orderly market.”[60]
  - This smelter will no longer be accepted as Good Delivery by the London Bullion Market until further notice.[61]
- CME Group alongside its subsidiary, Commodity Exchange Inc. (COMEX), have suspended the approved status for warranting and delivery for gold smelter OJSC, the Gulidov Krasnoyarsk Non-Ferrous Metals Plant (OJSC Krastsvetmet).[62]

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[57] Congressional Research Service. (2022, January 18). *U.S. Sanctions on Russia.* https://sgp.fas.org/crs/row/R45415.pdf
[58] U.S. Department of the Treasury. (2022, February 24). *List of Foreign Financial Institutions Subject to Correspondent Account or Payable-Through Account Sanctions (CAPTA List).* https://home.treasury.gov/policy-issues/financial-sanctions/consolidated-sanctions-list-non-sdn-lists/list-of-foreign-financial-institutions-subject-to-correspondent-account-or-payable-through-account-sanctions-capta-list; U.S. Department of the Treasury. (2022, February 24). *U.S. Treasury Announces Unprecedented & Expansive Sanctions Against Russia, Imposing Swift and Severe Economic Costs.* https://home.treasury.gov/news/press-releases/jy0608; U.S. Department of the Treasury. (n.d). *Specially Designated Nationals List.* https://www.trade.gov/consolidated-screening-list; International Trade Administration. (n.d.). *Consolidated Screening List.* https://www.trade.gov/consolidated-screening-list; European Commission. (n.d.). *Restrictive Measures (Sanctions).* https://ec.europa.eu/info/business-economy-euro/banking-and-finance/international-relations/restrictive-measures-sanctions_en
[59] London Bullion Market Association. (2022, March 7). *Good Delivery List Update: Gold & Silver Russian Refiners Suspended.* https://www.lbma.org.uk/articles/good-delivery-list-update-gold-silver-russian-refiners-suspended?
[60] London Bullion Market Association. (2022, March 7). *Good Delivery List Update: Gold & Silver Russian Refiners Suspended.* https://www.lbma.org.uk/articles/good-delivery-list-update-gold-silver-russian-refiners-suspended?
[61] London Bullion Market Association. (2022, March 7). *Good Delivery List Update: Gold & Silver Russian Refiners Suspended.* https://www.lbma.org.uk/articles/good-delivery-list-update-gold-silver-russian-refiners-suspended?
[62] CME Group. (2022, March 7). *Suspension of Approved Status for Warranting and Delivery of Certain Gold and Silver Brands.* https://www.cmegroup.com/notices/market-regulation/2022/03/MKR03-07-22.html

    - CME Group released the statement on March 7, 2022, replicating the decision by the LBMA.[63]
- Recent market sentiment and consensus are that there is significant uncertainty regarding the Russian Federation, given its social and political instability.
    - The actions of Russian forces during Russia's invasion of Ukraine have led the Ukrainian government as well as much of the international community to accuse Russia of violating international law.[64]
    - The Secretary-General of the UN and the U.S. Secretary of State asserted that Russia's invasion of Ukraine has led to an increase in human rights violations.[65]
    - The CRS reported the U.S. will continue sanctions against Russia due to the following conflict-related activities: the use of a chemical weapon, human rights abuses, malicious cyber-enabled activities and influence operations (including election interference), illicit trade with North Korea, support of the Syrian and Venezuelan governments, the use of energy exports as a coercive or political tool, and weapons proliferation.[66]
- Through corporate registry verification and business relationships investigation, smelter OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant"[67] has been identified as holding ties to sanctioned entities/persons.

## Prioksky Plant of Non-Ferrous Metals – CID001386

**Location:** Russian Federation
**Mineral:** Gold

### Geo Risk

- This SOR is located in Russia, a country currently subject to international sanctions due to the ongoing conflict with Ukraine, resulting in the suspension of RMAP audits.

### Audit Risk

- **Under due diligence review.**
    - This smelter is under review by the RMI and cannot participate in the RMAP audit program.

### Sourcing Risk

- The LBMA has delisted gold smelter Prioksky Plant of Non-Ferrous Metals from its Good Delivery List.[68]
    - The LBMA made the decision on March 7, 2022, "in light of UK/EU/US sanctions and to ensure an orderly market."[69]

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[63] CME Group. (2022, March 7). *Suspension of Approved Status for Warranting and Delivery of Certain Gold and Silver Brands.* https://www.cmegroup.com/notices/market-regulation/2022/03/MKR03-07-22.html
[64] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[65]Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[66] Congressional Reporting Service. (2022, March 18). *U.S. Sanctions on Russia. Updated January 18, 2022.* https://sgp.fas.org/crs/row/R45415.pdf
[67] U.S. Department of the Treasury. (n.d.). *Specially Designated Nationals List.* https://www.trade.gov/consolidated-screening-list; International Trade Administration. (n.d.). *Consolidated Screening List.* https://www.trade.gov/consolidated-screening-list; European Commission. (n.d.). *Restrictive Measures (Sanctions).* https://ec.europa.eu/info/business-economy-euro/banking-and-finance/international-relations/restrictive-measures-sanctions_en
[68] London Bullion Market Association. (2022, March 7). *Good Delivery List Update: Gold & Silver Russian Refiners Suspended.* https://www.lbma.org.uk/articles/good-delivery-list-update-gold-silver-russian-refiners-suspended?
[69] London Bullion Market Association. (2022, March 7). *Good Delivery List Update: Gold & Silver Russian Refiners Suspended.* https://www.lbma.org.uk/articles/good-delivery-list-update-gold-silver-russian-refiners-suspended?

    - This smelter will no longer be accepted as Good Delivery by the London Bullion Market until further notice.[70]
- CME Group alongside its subsidiary, Commodity Exchange Inc. (COMEX), have suspended the approved status for warranting and delivery for gold smelter Prioksky Plant of Non-Ferrous Metals.[71]
    - CME Group released the statement on March 7, 2022, replicating the decision by the LBMA.[72]
- Recent market sentiment and consensus are that there is significant uncertainty regarding the Russian Federation, given its social and political instability.
    - The actions of Russian forces during Russia's invasion of Ukraine violate international law, contend the Ukrainian government and much of the international community.[73]
    - The Secretary-General of the UN and the U.S. Secretary of State both assert Russia's invasion of Ukraine has led to increased human rights violations.[74]
    - A CRS report highlighted the conflict-related activities that have led to the U.S. maintaining its sanctions against Russia: malicious cyber-enabled activities and influence operations (including election interference), the use of a chemical weapon, human rights abuses, the use of energy exports as a coercive or political tool, weapons proliferation, illicit trade with North Korea, and support to the governments of Syria and Venezuela.[75]
- Through corporate registry verification and business relationships investigation, smelter Prioksky Plant of Non-Ferrous Metals[76] has been identified as holding ties to sanctioned entities/persons.

## Samduck Precious Metals – CID001555

**Location:** Republic of Korea
**Mineral:** Gold

### Geo Risk

- This SOR is located in a country with moderate risks related to the transfer and sale of minerals, particularly those from conflict-affected and high-risk areas, including the DRC and its adjoining countries.[77]

### Audit Risk

- **Non-conformant.**
    - This SOR is non-conformant with the RMAP audit program.

[70] London Bullion Market Association. (2022, March 7). *Good Delivery List Update: Gold & Silver Russian Refiners Suspended.* https://www.lbma.org.uk/articles/good-delivery-list-update-gold-silver-russian-refiners-suspended?
[71] CME Group. (2022, March 7). *Suspension of Approved Status for Warranting and Delivery of Certain Gold and Silver Brands.* https://www.cmegroup.com/notices/market-regulation/2022/03/MKR03-07-22.html
[72] CME Group. (2022, March 7). *Suspension of Approved Status for Warranting and Delivery of Certain Gold and Silver Brands.* https://www.cmegroup.com/notices/market-regulation/2022/03/MKR03-07-22.html
[73] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[74] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[75] Congressional Reporting Service. (2022, January 18). *U.S. Sanctions on Russia.* https://sgp.fas.org/crs/row/R45415.pdf
[76] U.S. Department of the Treasury. (n.d.). *Specially Designated Nationals List.* https://www.trade.gov/consolidated-screening-list; International Trade Administration. (n.d.). *Consolidated Screening List.* https://www.trade.gov/consolidated-screening-list; European Commission. (n.d.). *Restrictive Measures (Sanctions).* https://ec.europa.eu/info/business-economy-euro/banking-and-finance/international-relations/restrictive-measures-sanctions_en
[77] The assignment of this elevated risk status is based on an analysis of over 10,000 individual mentions in various Conflict Minerals Reporting Templates (CMRTs). If you wish to dispute any claim presented in this document, we encourage you to contact us for resolution.

## Sourcing Risk

- According to available RCOI data, this smelter sources from a conflict-affected and high-risk area (CAHRA) country.
- According to available RCOI data, this smelter sources from the DRC.

# SOE Shyolkovsky Factory of Secondary Precious Metals – CID001756

**Location:** Russian Federation
**Mineral:** Gold

## Geo Risk

- This SOR is located in Russia, a country currently subject to international sanctions due to the ongoing conflict with Ukraine, resulting in the suspension of RMAP audits.

## Audit Risk

- **Under due diligence review.**
  - This smelter is under review by the RMI and cannot participate in the RMAP audit program.

## Sourcing Risk

- The LBMA has delisted gold smelter SOE Shyolkovsky Factory of Secondary Precious Metals from its Good Delivery List.[78]
  - The LBMA made the decision on March 7, 2022, "in light of UK/EU/US sanctions and to ensure an orderly market."[79]
  - This smelter will no longer be accepted as Good Delivery by the London Bullion Market until further notice.[80]
- CME Group alongside its subsidiary, Commodity Exchange Inc. (COMEX), have suspended the approved status for warranting and delivery for gold smelter SOE Shyolkovsky Factory of Secondary Precious Metals.[81]
  - CME Group released the statement on March 7, 2022, replicating the decision by the LBMA.[82]
- Recent market sentiment and consensus are that there is significant uncertainty regarding the Russian Federation, given its social and political instability.
  - The Ukrainian government, along with much of the international community, asserts that the actions of Russian forces during Russia's invasion of Ukraine violate international law.[83]

[78] London Bullion Market Association. (2022, March 7). *Good Delivery List Update: Gold & Silver Russian Refiners Suspended.* https://www.lbma.org.uk/articles/good-delivery-list-update-gold-silver-russian-refiners-suspended?
[79] London Bullion Market Association. (2022, March 7). *Good Delivery List Update: Gold & Silver Russian Refiners Suspended.* https://www.lbma.org.uk/articles/good-delivery-list-update-gold-silver-russian-refiners-suspended?
[80] London Bullion Market Association. (2022, March 7). *Good Delivery List Update: Gold & Silver Russian Refiners Suspended.* https://www.lbma.org.uk/articles/good-delivery-list-update-gold-silver-russian-refiners-suspended?
[81] CME Group. (2022, March 7). *Suspension of Approved Status for Warranting and Delivery of Certain Gold and Silver Brands.* https://www.cmegroup.com/notices/market-regulation/2022/03/MKR03-07-22.html
[82] CME Group. (2022, March 7). Suspension of Approved Status for Warranting and Delivery of Certain Gold and Silver Brands. https://www.cmegroup.com/notices/market-regulation/2022/03/MKR03-07-22.html
[83] Congressional Research Service. (2022, March 18). The Role of International Tribunals in the Response to the Invasion of Ukraine. https://crsreports.congress.gov/product/pdf/LSB/LSB10704

- The Secretary-General of the UN and the U.S. Secretary of State also claim that Russia's invasion of Ukraine has led to increased human rights abuses.[84]
- In a CRS report from January 2022, authors cited that conflict-related activities were causing the U.S. to continue sanctions against Russia: support to the governments of Syria and Venezuela, malicious cyber-enabled activities and influence operations (including election interference), weapons proliferation, illicit trade with North Korea, the use of a chemical weapon, human rights abuses, and the use of energy exports as a coercive or political tool.[85]

## Sovereign Metals – CID003383

**Location:** India
**Mineral:** Gold

### Geo Risk

- This SOR is located in a country with moderate risks related to the transfer and sale of minerals, particularly those from conflict-affected and high-risk areas, including the DRC and its adjoining countries.

### Audit Risk

- **Outreach required.**
  - This smelter has not engaged with the RMAP audit program.

### Sourcing Risk

- According to available RCOI data, this smelter sources from a conflict-affected and high-risk area (CAHRA) country.
- According to available RCOI data, this smelter sources from the DRC.

## Yunnan Copper Industry Co. Ltd. – CID000197

**Location:** China
**Mineral:** Gold

### Geo Risk

- This SOR is located in a country with moderate risks related to the transfer and sale of minerals, particularly those from conflict-affected and high-risk areas, including the DRC and its adjoining countries.

### Audit Risk

- **Outreach required.**
  - This smelter has not engaged with the RMAP audit program.

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[84] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[85] Congressional Reporting Service. (2022, January 18). *U.S. Sanctions on Russia.* https://sgp.fas.org/crs/row/R45415.pdf

## Sourcing Risk

- According to available RCOI data, this smelter sources from a conflict-affected and high-risk area (CAHRA) country.
- According to available RCOI data, this smelter sources from the DRC.

# Shandong Gold Smelting Co., Ltd. – CID001916

**Location:** China
**Mineral:** Gold

## Geo Risk

- This SOR is located in a country with moderate risks related to the transfer and sale of minerals, particularly those from conflict-affected and high-risk areas, including the DRC and its adjoining countries.

## Audit Risk

- **Unable to proceed.**
  - This smelter is on a sanction list and therefore unable to proceed with the audit.

## Sourcing Risk

- As of August 3rd 2026 this entity has been listed on the UFLPA entity list.

# Luoyang Zijin Yinhui Gold Refinery Co., Ltd. – CID001093

**Location:** China
**Mineral:** Gold

## Geo Risk

- This SOR is located in a country with moderate risks related to the transfer and sale of minerals, particularly those from conflict-affected and high-risk areas, including the DRC and its adjoining countries.

## Audit Risk

- **Unable to proceed.**
  - This smelter is on a sanction list and therefore unable to proceed with the audit.

## Sourcing Risk

- As of August 3rd 2026 this entity has been listed on the UFLPA entity list.

# Tin Refiners

## Gejiu Kai Meng Industry & Trade – CID000942

**Location:** China
**Mineral:** Tin

### Geo Risk

- This SOR is located in a country with moderate risks related to the transfer and sale of minerals, particularly those from conflict-affected and high-risk areas, including the DRC and its adjoining countries.

### Audit Risk

- **Non-conformant.**
  - This SOR is non-conformant with the RMAP audit program.

### Sourcing Risk

- According to available RCOI data, this smelter sources from a conflict-affected and high-risk area (CAHRA).

## Gejiu Zili Mining & Metallurgy Co. Ltd. – CID000555

**Location:** China
**Mineral:** Tin

### Geo Risk

- This SOR is located in a country with moderate risks related to the transfer and sale of minerals, particularly those from conflict-affected and high-risk areas, including the DRC and its adjoining countries.

### Audit Risk

- **Non-conformant.**
  - This SOR is non-conformant with the RMAP audit program.

### Sourcing Risk

- This SOR claimed to have ceased operations, but refused to file a Declaration of Ceased Operations (DOC) with the RMI, resulting in the smelter being removed from the RMAP-conformant list.
- According to available RCOI data, this smelter sources from the DRC.

# Nghe Tinh Non-Ferrous Metals Joint Stock Company – CID002573

**Location:** Vietnam
**Mineral:** Tin

## Geo Risk

- This SOR is located in a country with moderate risks related to the transfer and sale of minerals, particularly those from conflict-affected and high-risk areas, including the DRC and its adjoining countries.

## Audit Risk

- **Outreach required.**
  - This smelter has not engaged with the RMAP audit program.

## Sourcing Risk

- According to available RCOI data, this smelter sources from a conflict-affected and high-risk area (CAHRA).
- According to available RCOI data, this smelter sources from the DRC.

# Novosibirsk Tin Combine – CID001305

**Location:** Russian Federation
**Mineral:** Tin

## Geo Risk

- This SOR is located in Russia, a country currently subject to international sanctions due to the ongoing conflict with Ukraine, resulting in the suspension of RMAP audits.

## Audit Risk

- **Under due diligence review.**
  - This smelter is under review by the RMI and cannot participate in the RMAP audit program.

## Sourcing Risk

- Recent market sentiment and consensus are that there is significant uncertainty around the Russian Federation, given its social and political instability.
  - The Ukrainian government, joined by much of the international community, stated that actions taken by Russian forces during Russia's invasion of Ukraine violate international law.[86]
  - The Secretary-General of the UN and the U.S. Secretary of State assert Russia's invasion of Ukraine has led to an increase in human rights violations.[87]

[86] Congressional Research Service. (2022, March 18). The Role of International Tribunals in the Response to the Invasion of Ukraine. https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[87] Congressional Research Service. (2022, March 18). The Role of International Tribunals in the Response to the Invasion of Ukraine. https://crsreports.congress.gov/product/pdf/LSB/LSB10704

- The CRS reported that the following conflict-related activities have caused the U.S. to maintain its sanctions against Russia: malicious cyber-enabled activities and influence operations (including election interference), the use of a chemical weapon, human rights abuses, the use of energy exports as a coercive or political tool, weapons proliferation, illicit trade with North Korea, and support to the governments of Syria and Venezuela.[88]

- The RMI has suspended new RMAP assessments in Russia, effective as of September 19, 2022. "This suspension is informed by the RMI's commitment to compliance with all applicable laws and to its broader mission and vision."[89]

## VQB Mineral & Trading Group JSC – CID002015

**Location:** Thailand
**Mineral:** Tin

### Geo Risk

- This SOR is located in a country with moderate risks related to the transfer and sale of minerals, particularly those from conflict-affected and high-risk areas, including the DRC and its adjoining countries.

### Audit Risk

- **Outreach required.**
    - This smelter has not engaged with the RMAP audit program.

### Sourcing Risk

- According to available RCOI data, this smelter sources from the DRC.

## Yunnan Chengfeng Non-ferrous Metals Co. Ltd. – CID002158

**Location:** China
**Mineral:** Tin

### Geo Risk

- This SOR is located in a country with moderate risks related to the transfer and sale of minerals, particularly those from conflict-affected and high-risk areas, including the DRC and its adjoining countries.

### Audit Risk

- **Non-conformant.**
    - This SOR is non-conformant with the RMAP audit program.

[88] Congressional Reporting Service. (2022, January 18). U.S. Sanctions on Russia. https://sgp.fas.org/crs/row/R45415.pdf
[89] RMI. (2022, September 19). *Notice Regarding RMAP Russia-Based Auditees.* https://www.responsiblemineralsinitiative.org/news/notice-regarding-rmap-russia-based-auditees/

## Sourcing Risk

- According to available RCOI data, this smelter sources from a conflict-affected and high-risk area (CAHRA).

# Tungsten Refiners

## Hunan Jintai New Material Co. Ltd. – CID000769

**Location:** China
**Mineral:** Tungsten

### Geo Risk

- This SOR is located in a country with moderate risks related to the transfer and sale of minerals, particularly those from conflict-affected and high-risk areas, including the DRC and its adjoining countries.

### Audit Risk

- **Non-conformant.**
  - This SOR is non-conformant with the RMAP audit program.

### Sourcing Risk

- According to available RCOI data, this smelter sources from a conflict-affected and high-risk area (CAHRA).

## Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch – CID002513

**Location:** China
**Mineral:** Tungsten

### Geo Risk

- This SOR is located in a country with moderate risks related to the transfer and sale of minerals, particularly those from conflict-affected and high-risk areas, including the DRC and its adjoining countries.

### Audit Risk

- **Non-conformant.**
  - This SOR is non-conformant with the RMAP audit program.

### Sourcing Risk

- According to available RCOI data, this smelter sources from a conflict-affected and high-risk area (CAHRA).

# Hydrometallurg JSC – CID002649

**Location:** Russian Federation
**Mineral:** Tungsten

## Geo Risk

- This SOR is located in Russia, a country currently subject to international sanctions due to the ongoing conflict with Ukraine, resulting in the suspension of RMAP audits.

## Audit Risk

- **Under due diligence review.**
  - This smelter is under review by the RMI and cannot participate in the RMAP audit program.

## Sourcing Risk

- Recent market sentiment and consensus are that there is significant uncertainty around the Russian Federation, given its social and political instability.
  - The Ukrainian government as well as much of the international community assert that the actions of Russian forces during Russia's invasion of Ukraine violate international law.[90]
  - The Secretary-General of the UN and the U.S. Secretary of State contend Russia's invasion of Ukraine has led to increased human rights violations.[91]
  - A January 2022 CRS report cited the following conflict-related activities fueling continued U.S. sanctions on Russia: illicit trade with North Korea, the use of a chemical weapon, the use of energy exports as a coercive or political tool, malicious cyber-enabled activities and influence operations (including election interference), support for Venezuelan and Syrian governments, human rights abuses, and weapons proliferation.[92]
- The RMI has suspended new RMAP assessments in Russia, effective as of September 19, 2022. "This suspension is informed by the RMI's commitment to compliance with all applicable laws and to its broader mission and vision."[93]
- Through corporate registry verification and business relationships investigations, smelter Hydrometallurg JSC[94] has been identified as holding ties to sanctioned entities/persons.[95]

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[90] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704

[91] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704

[92] Congressional Reporting Service. (2022, January 18). *U.S. Sanctions on Russia.* https://sgp.fas.org/crs/row/R45415.pdf

[93] RMI. (2022, September 19). Notice Regarding RMAP Russia-Based Auditees. https://www.responsiblemineralsinitiative.org/news/notice-regarding-rmap-russia-based-auditees/

[94] U.S. Department of the Treasury. (n.d.) *Specially Designated Nationals List.* https://www.trade.gov/consolidated-screening-list; International Trade Administration. (n.d.). *Consolidated Screening List.* https://www.trade.gov/consolidated-screening-list; U.S. Department of the Treasury. (2022, February 24). *List of Foreign Financial Institutions Subject to Correspondent Account or Payable-Through Account Sanctions (CAPTA List).* https://home.treasury.gov/policy-issues/financial-sanctions/consolidated-sanctions-list-non-sdn-lists/list-of-foreign-financial-institutions-subject-to-correspondent-account-or-payable-through-account-sanctions-capta-list; U.S. Department of the Treasury. (2022, February 24). *U.S. Treasury Announces Unprecedented & Expansive Sanctions Against Russia, Imposing Swift and Severe Economic Costs.* https://home.treasury.gov/news/press-releases/jy0608; European Commission. (n.d.). *Restrictive Measures (Sanctions).* https://ec.europa.eu/info/business-economy-euro/banking-and-finance/international-relations/restrictive-measures-sanctions_en

[95] Russia Legal Entities with Disqualified Executives; Gov.UK. (n.d.). *HMT OFSI UK Sanctions List.* https://www.gov.uk/government/publications/the-uk-sanctions-list; International Trade Administration. (n.d.). *USA Consolidated Screening List.* https://www.trade.gov/consolidated-screening-list; U.S. Department of Treasury. (n.d.). *USA Treasury Specially Designated Nationals (SDN) List.* https://home.treasury.gov/policy-issues/financial-sanctions/specially-designated-nationals-and-blocked-persons-list-sdn-human-readable-lists; Government of Canada. (n.d.). *Export Control Lists.* https://www.international.gc.ca/controls-controles/about-a_propos/expor/guide-2018.aspx?lang=eng; *NameScan. (n.d.) Politically Exposed Person.* https://namescan.io/freepepcheck; SWFI. (n.d.) *List of 343 State Owned Enterprise Profiles by Region.* https://www.swfinstitute.org/profiles/state-owned-enterprise; Financial Crimes Enforcement Network. (n.d.) Financial Crime Regulatory Action. https://www.fincen.gov/news-room/enforcement-actions; NAICS. (n.d.). High Risk/Cash Intensive Industries ISIC4 4719 —

- According to available RCOI data, this smelter sources from the DRC.

## JSC Kirovgrad Hard Alloys Plant – CID003408

**Location:** Russian Federation
**Mineral:** Tungsten

### Geo Risk

- This SOR is located in Russia, a country currently subject to international sanctions due to the ongoing conflict with Ukraine, resulting in the suspension of RMAP audits.

### Audit Risk

- **Under due diligence review.**
  - This smelter is under review by the RMI and cannot participate in the RMAP audit program.

### Sourcing Risk

- Recent market sentiment and consensus are that there is significant uncertainty around the Russian Federation, given its social and political instability.
  - The Ukrainian government, joined by much of the international community, contends that the actions of Russian forces during Russia's invasion of Ukraine violate international law.[96]
  - The Secretary-General of the UN and the U.S. Secretary of State assert Russia's invasion of Ukraine has led to increased human rights violations.[97]
  - A January 2022 CRS report revealed that the U.S. will continue its sanctions against Russia due to the following conflict-related activities: the use of energy exports as a coercive or political tool, support of the Syrian and Venezuelan governments, malicious cyber-enabled activities and influence operations (including election interference), human rights abuses, illicit trade with North Korea, weapons proliferation, and the use of a chemical weapon.[98]
- Through corporate registry verification and business relationships investigation, smelter JSC Kirovgrad Hard Alloys Plant[99] has been identified as being formerly connected to sanctioned entities/persons.

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Retail (Cash Intensive Businesses). https://www.naics.com/wp-content/uploads/2014/10/NAICS-ASSOCIATION-High-Risk-and-Cash-Intensive-NAICS-Codes-List.pdf; Former Sanctions; NAICS. (n.d.). High Risk/Cash Intensive Industries ISIC4 6499 — Currency Exchange/Pawn Shop (MSBs/NBFIs). https://www.naics.com/wp-content/uploads/2014/10/NAICS-ASSOCIATION-High-Risk-and-Cash-Intensive-NAICS-Codes-List.pdf; UK government. (n.d.) Law Enforcement Action, Listed under Schedule 2 of the Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855). https://www.legislation.gov.uk/uksi/2019/855/contents/made

[96] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704

[97] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704

[98] Congressional Reporting Service. (2022, January 18). *U.S. Sanctions on Russia.* https://sgp.fas.org/crs/row/R45415.pdf

[99] U.S. Department of the Treasury. (2022, February 24). *List of Foreign Financial Institutions Subject to Correspondent Account or Payable-Through Account Sanctions (CAPTA List).* https://home.treasury.gov/policy-issues/financial-sanctions/consolidated-sanctions-list-non-sdn-lists/list-of-foreign-financial-institutions-subject-to-correspondent-account-or-payable-through-account-sanctions-capta-list; U.S. Department of the Treasury. (2022, February 24). *U.S. Treasury Announces Unprecedented & Expansive Sanctions Against Russia, Imposing Swift and Severe Economic Costs.* https://home.treasury.gov/news/press-releases/jy0608; U.S. Department of the Treasury. (n.d). *Specially Designated Nationals List.* https://www.trade.gov/consolidated-screening-list; International Trade Administration. (n.d.). *Consolidated Screening List.* https://www.trade.gov/consolidated-screening-list; European Commission. (n.d.). *Restrictive Measures (Sanctions).* https://ec.europa.eu/info/business-economy-euro/banking-and-finance/international-relations/restrictive-measures-sanctions_en

- The RMI has suspended new RMAP assessments in Russia, effective as of September 19, 2022. "This suspension is informed by the RMI's commitment to compliance with all applicable laws and to its broader mission and vision."[100]

## Moliren Ltd. – CID002845

**Location:** Russian Federation
**Mineral:** Tungsten

### Geo Risk

- This SOR is located in Russia, a country currently subject to international sanctions due to the ongoing conflict with Ukraine, resulting in the suspension of RMAP audits.

### Audit Risk

- **Under due diligence review.**
  - This smelter is under review by the RMI and cannot participate in the RMAP audit program.

### Sourcing Risk

- Recent market sentiment and consensus are that there is significant uncertainty around the Russian Federation, given its social and political instability.
  - The Ukrainian government as well as much of the international community maintain that actions taken by Russian forces during Russia's invasion of Ukraine violate international law.[101]
  - The Secretary-General of the UN and the U.S. Secretary of State also assert that Russia's invasion of Ukraine has increased human rights violations.[102]
  - A January 2022 CRS report highlighted the following conflict-related reasons for continued U.S. sanctions against Russia: the use of a chemical weapon, weapons proliferation, supporting the Syrian and Venezuelan governments, the use of energy exports as a coercive or political tool, malicious cyber-enabled activities and influence operations (including election interference), illicit trade with North Korea, and human rights abuses.[103]
- The RMI has suspended new RMAP assessments in Russia, effective as of September 19, 2022. "This suspension is informed by the RMI's commitment to compliance with all applicable laws and to its broader mission and vision."[104]

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[100] RMI. (2022, September 19). *Notice Regarding RMAP Russia-Based Auditees.* https://www.responsiblemineralsinitiative.org/news/notice-regarding-rmap-russia-based-auditees/
[101] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[102] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[103] Congressional Reporting Services. (2022, January 18). *U.S. Sanctions on Russia.* https://sgp.fas.org/crs/row/R45415.pdf
[104] RMI. (2022, September 19). *Notice Regarding RMAP Russia-Based Auditees.* https://www.responsiblemineralsinitiative.org/news/notice-regarding-rmap-russia-based-auditees/

# NPP Tyazhmetprom LLC – CID003416

**Location:** Russian Federation
**Mineral:** Tungsten

## Geo Risk

- This SOR is located in Russia, a country currently subject to international sanctions due to the ongoing conflict with Ukraine, resulting in the suspension of RMAP audits.

## Audit Risk

- **Under due diligence review.**
  - This smelter is under review by the RMI and cannot participate in the RMAP audit program.

## Sourcing Risk

- Recent market sentiment and consensus are that there is significant uncertainty around the Russian Federation, given its social and political instability.
  - Actions taken by Russian forces during Russia's invasion of Ukraine violate international law, assert the Ukrainian government as well as much of the international community.[105]
  - The Secretary-General of the UN and the U.S. Secretary of State contend that Russia's invasion of Ukraine has led to an increase in human rights violations.[106]
  - The CRS reported in January 2022 that the U.S. will continue its sanctions on Russia due to the following conflict-related activities: the use of energy exports as a coercive or political tool, supporting the Syrian and Venezuelan governments, malicious cyber-enabled activities and influence operations (including election interference), weapons proliferation, the use of a chemical weapon, human rights abuses, and illicit trade with North Korea.[107]
- The RMI has suspended new RMAP assessments in Russia, effective as of September 19, 2022. "This suspension is informed by the RMI's commitment to compliance with all applicable laws and to its broader mission and vision."[108]

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[105] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[106] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[107] Congressional Reporting Service. (2022, January 18). *U.S. Sanctions on Russia.* https://sgp.fas.org/crs/row/R45415.pdf
[108] RMI. (2022, September 19). *Notice Regarding RMAP Russia-Based Auditees.* https://www.responsiblemineralsinitiative.org/news/notice-regarding-rmap-russia-based-auditees/

# OOO "Technolom" 1 – CID003614

**Location:** Russian Federation
**Mineral:** Tungsten

## Geo Risk

- This SOR is located in Russia, a country currently subject to international sanctions due to the ongoing conflict with Ukraine, resulting in the suspension of RMAP audits.

## Audit Risk

- **Under due diligence review.**
  - This smelter is under review by the RMI and cannot participate in the RMAP audit program.

## Sourcing Risk

- Recent market sentiment and consensus are that there is significant uncertainty around the Russian Federation, given its social and political instability.
  - The Ukrainian government, as well as much of the international community, state that the actions of Russian forces during their invasion of Ukraine violated international law.[109]
  - The Secretary-General of the UN and the U.S. Secretary of State assert that Russia's invasion of Ukraine has caused an increase in human rights violations.[110]
  - The CRS highlighted the following conflict-related activities that have led to the continued U.S. sanctions on Russia: supporting the Syrian and Venezuelan governments, the use of a chemical weapon, the use of energy exports as a coercive or political tool, human rights abuses, malicious cyber-enabled activities and influence operations (including election interference), illicit trade with North Korea, and weapons proliferation.[111]
- The RMI has suspended new RMAP assessments in Russia, effective as of September 19, 2022. "This suspension is informed by the RMI's commitment to compliance with all applicable laws and to its broader mission and vision."[112]

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[109] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[110] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[111] Congressional Reporting Services. (2022, January 18). *U.S. Sanctions on Russia*. https://sgp.fas.org/crs/row/R45415.pdf
[112] RMI. (2022, September 19). *Notice Regarding RMAP Russia-Based Auditees.* https://www.responsiblemineralsinitiative.org/news/notice-regarding-rmap-russia-based-auditees/

# OOO “Technolom” 2 – CID003612

**Location:** Russian Federation
**Mineral:** Tungsten

## Geo Risk

- This SOR is located in Russia, a country currently subject to international sanctions due to the ongoing conflict with Ukraine, resulting in the suspension of RMAP audits.

## Audit Risk

- **Under due diligence review.**
  - This smelter is under review by the RMI and cannot participate in the RMAP audit program.

## Sourcing Risk

- Recent market sentiment and consensus are that there is significant uncertainty around the Russian Federation, given its social and political instability.
  - The Ukrainian government as well as much of the international community maintain that actions taken by Russian forces during Russia’s invasion of Ukraine violate international law.[113]
  - The Secretary-General of the UN and the U.S. Secretary of State also assert that Russia’s invasion of Ukraine has increased human rights violations.[114]
  - A January 2022 CRS report highlighted the following conflict-related reasons for continued U.S. sanctions against Russia: the use of a chemical weapon, weapons proliferation, supporting the Syrian and Venezuelan governments, the use of energy exports as a coercive or political tool, malicious cyber-enabled activities and influence operations (including election interference), illicit trade with North Korea, and human rights abuses.[115]
- The RMI has suspended new RMAP assessments in Russia, effective as of September 19, 2022. “This suspension is informed by the RMI’s commitment to compliance with all applicable laws and to its broader mission and vision.”[116]

# Unecha Refractory Metals Plant – CID002724

**Location:** Russian Federation
**Mineral:** Tungsten

## Geo Risk

- This SOR is located in Russia, a country currently subject to international sanctions due to the ongoing conflict with Ukraine, resulting in the suspension of RMAP audits.

[113] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine*. https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[114] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine*. https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[115] Congressional Reporting Services. (2022, January 18). *U.S. Sanctions on Russia*. https://sgp.fas.org/crs/row/R45415.pdf
[116] RMI. (2022, September 19). *Notice Regarding RMAP Russia-Based Auditees*. https://www.responsiblemineralsinitiative.org/news/notice-regarding-rmap-russia-based-auditees/

## Audit Risk

- **Under due diligence review.**
  - This smelter is under review by the RMI and cannot participate in the RMAP audit program.

## Sourcing Risk

- Recent market sentiment and consensus are that there is significant uncertainty around the Russian Federation, given its social and political instability.
  - The Ukrainian government as well as much of the international community maintain that actions taken by Russian forces during Russia's invasion of Ukraine violate international law.[117]
  - The Secretary-General of the UN and the U.S. Secretary of State also assert that Russia's invasion of Ukraine has increased human rights violations.[118]
  - A January 2022 CRS report highlighted the following conflict-related reasons for continued U.S. sanctions against Russia: the use of a chemical weapon, weapons proliferation, supporting the Syrian and Venezuelan governments, the use of energy exports as a coercive or political tool, malicious cyber-enabled activities and influence operations (including election interference), illicit trade with North Korea, and human rights abuses.[119]
- The RMI has suspended new RMAP assessments in Russia, effective as of September 19, 2022. "This suspension is informed by the RMI's commitment to compliance with all applicable laws and to its broader mission and vision."[120]

# Tantalum Refiners

## Solikamsk Magnesium Works OAO – CID001769

**Location:** Russian Federation
**Mineral:** Tantalum

## Geo Risk

- This SOR is located in Russia, a country currently subject to international sanctions due to the ongoing conflict with Ukraine, resulting in the suspension of RMAP audits.

## Audit Risk

- **Under due diligence review.**
  - This smelter is under review by the RMI and cannot participate in the RMAP audit program.

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[117] Congressional Research Service. (2022, March 18). The Role of International Tribunals in the Response to the Invasion of Ukraine. https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[118] Congressional Research Service. (2022, March 18). The Role of International Tribunals in the Response to the Invasion of Ukraine. https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[119] Congressional Reporting Services. (2022, January 18). U.S. Sanctions on Russia. https://sgp.fas.org/crs/row/R45415.pdf
[120] RMI. (2022, September 19). Notice Regarding RMAP Russia-Based Auditees. https://www.responsiblemineralsinitiative.org/news/notice-regarding-rmap-russia-based-auditees/

### Sourcing Risk

- Recent market sentiment and consensus are that there is significant uncertainty around the Russian Federation, given its social and political instability.
  - The Ukrainian government, joined by much of the international community, contends that the actions of Russian forces during Russia's invasion of Ukraine violate international law.[121]
  - The Secretary-General of the UN and the U.S. Secretary of State assert that Russia's invasion of Ukraine has led to increased human rights violations.[122]
  - A January 2022 CRS report revealed that the U.S. will continue its sanctions against Russia due to the following conflict-related activities: the use of energy exports as a coercive or political tool, support of the Syrian and Venezuelan governments, malicious cyber-enabled activities and influence operations (including election interference), human rights abuses, illicit trade with North Korea, weapons proliferation, and the use of a chemical weapon.[123]
- Through corporate registry verification and business relationships investigation, smelter Solikamsk Magnesium Works OAO[124] has been identified as holding ties to sanctioned entities/persons.
- The RMI has suspended new RMAP assessments in Russia, effective as of September 19, 2022. "This suspension is informed by the RMI's commitment to compliance with all applicable laws and to its broader mission and vision."[125]

# Extended Minerals Smelters (Cobalt, Mica, Copper, Natural Graphite, Lithium, Nickel)

# Cobalt Refiners

## Compagnie Minière de Musonoie Global SAS – CID003499

**Location:** Democratic Republic of the Congo
**Mineral:** Cobalt

### Geo Risk

- This SOR is located in the DRC, a covered country under the Dodd-Frank Act.

[121] Congressional Research Service. (2022, March 18). The Role of International Tribunals in the Response to the Invasion of Ukraine. https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[122] Congressional Research Service. (2022, March 18). The Role of International Tribunals in the Response to the Invasion of Ukraine. https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[123] Congressional Reporting Service. (2022, January 18). *U.S. Sanctions on Russia.* https://sgp.fas.org/crs/row/R45415.pdf
[124] U.S. Department of the Treasury. (2022, February 24). List of Foreign Financial Institutions Subject to Correspondent Account or Payable-Through Account Sanctions (CAPTA List). https://home.treasury.gov/policy-issues/financial-sanctions/consolidated-sanctions-list-non-sdn-lists/list-of-foreign-financial-institutions-subject-to-correspondent-account-or-payable-through-account-sanctions-capta-list; U.S. Department of the Treasury. (2022, February 24). U.S. Treasury Announces Unprecedented & Expansive Sanctions Against Russia, Imposing Swift and Severe Economic Costs. https://home.treasury.gov/news/press-releases/jy0608; U.S. Department of the Treasury. (n.d). Specially Designated Nationals List. https://www.trade.gov/consolidated-screening-list; International Trade Administration. (n.d.). Consolidated Screening List. https://www.trade.gov/consolidated-screening-list; European Commission. (n.d.). Restrictive Measures (Sanctions). https://ec.europa.eu/info/business-economy-euro/banking-and-finance/international-relations/restrictive-measures-sanctions_en
[125] RMI. (2022, September 19). *Notice Regarding RMAP Russia-Based Auditees.* https://www.responsiblemineralsinitiative.org/news/notice-regarding-rmap-russia-based-auditees/

## Audit Risk

- **Outreach required.**
  - This smelter has not engaged with the RMAP audit program.

## Sourcing Risk

- This smelter is located in the DRC, a conflict-affected and high-risk area (CAHRA) country and therefore it can be assumed that material is sourced from this area as well.

# JSC Kolskaya Mining & Metallurgical Company (KOLA MMC) – CID003233

**Location:** Russian Federation
**Mineral:** Cobalt

## Geo Risk

- This SOR is located in Russia, a country currently subject to international sanctions due to the ongoing conflict with Ukraine, resulting in the suspension of RMAP audits.

## Audit Risk

- **Under due diligence review.**
  - This smelter is under review by the RMI and cannot participate in the RMAP audit program.

## Sourcing Risk

- Recent market sentiment and consensus are that there is significant uncertainty around the Russian Federation, given its social and political instability.
  - The Ukrainian government as well as much of the international community assert that the actions of Russian forces during Russia's invasion of Ukraine violate international law.[126]
  - The Secretary-General of the UN and the U.S. Secretary of State contend Russia's invasion of Ukraine has led to increased human rights violations.[127]
  - A January 2022 CRS report cited the following conflict-related activities fueling continued U.S. sanctions on Russia: illicit trade with North Korea, the use of a chemical weapon, the use of energy exports as a coercive or political tool, malicious cyber-enabled activities and influence operations (including election interference), support for Venezuelan and Syrian governments, human rights abuses, and weapons proliferation.[128]

[126] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[127] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[128] Congressional Reporting Service. (2022, January 18). *U.S. Sanctions on Russia.* https://sgp.fas.org/crs/row/R45415.pdf

- Through corporate registry verification and business relationships investigation, smelter JSC Kolskaya Mining and Metallurgical Company (Kola MMC)[129] has been identified as holding ties to sanctioned entities/persons.
- The RMI has suspended new RMAP assessments in Russia, effective as of September 19, 2022. "This suspension is informed by the RMI's commitment to compliance with all applicable laws and to its broader mission and vision."[130]

# La Minière de Kasombo SAS – CID003276

**Location:** Democratic Republic of the Congo
**Mineral:** Cobalt

## Geo Risk

- This SOR is located in the DRC, a covered country under the Dodd-Frank Act.

## Audit Risk

- **Outreach required.**
  - This smelter has not engaged with the RMAP audit program.

## Sourcing Risk

- This smelter is located in the DRC, a conflict-affected and high-risk area (CAHRA) country and therefore it can be assumed that material is sourced from this area as well.

# Metal Mines SARL – CID003385

**Location:** Democratic Republic of the Congo
**Mineral:** Cobalt

## Geo Risk

- This SOR is located in the DRC, a covered country under the Dodd-Frank Act.

## Audit Risk

- **Outreach required.**
  - This smelter has not engaged with the RMAP audit program.

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[129] U.S. Department of the Treasury. (n.d.) *Specially Designated Nationals List*. https://www.trade.gov/consolidated-screening-list; International Trade Administration. (n.d.). *Consolidated Screening List*. https://www.trade.gov/consolidated-screening-list; U.S. Department of the Treasury. (2022, February 24). *List of Foreign Financial Institutions Subject to Correspondent Account or Payable-Through Account Sanctions (CAPTA List)*. https://home.treasury.gov/policy-issues/financial-sanctions/consolidated-sanctions-list-non-sdn-lists/list-of-foreign-financial-institutions-subject-to-correspondent-account-or-payable-through-account-sanctions-capta-list; U.S. Department of the Treasury. (2022, February 24). *U.S. Treasury Announces Unprecedented & Expansive Sanctions Against Russia, Imposing Swift and Severe Economic Costs*. https://home.treasury.gov/news/press-releases/jy0608; European Commission. (n.d.). *Restrictive Measures (Sanctions)*. https://ec.europa.eu/info/business-economy-euro/banking-and-finance/international-relations/restrictive-measures-sanctions_en

[130] RMI. (2022, September 19). *Notice Regarding RMAP Russia-Based Auditees*. https://www.responsiblemineralsinitiative.org/news/notice-regarding-rmap-russia-based-auditees/

## Sourcing Risk

- According to available RCOI data, this smelter sources from the DRC.

# MKM — La Miniere de Kalumbwe Myunga – CID003464

**Location:** Democratic Republic of the Congo
**Mineral:** Cobalt

## Geo Risk

- This SOR is located in the DRC, a covered country under the Dodd-Frank Act.

## Audit Risk

- **Outreach required.**
  - This smelter has not engaged with the RMAP audit program.

## Sourcing Risk

- According to available RCOI data, this smelter sources from the DRC.

# Nadezhda Metallurgical Plant of MMC Norilsk Nickel's Polar Division – CID004011

**Location:** Russian Federation
**Mineral:** Cobalt

## Geo Risk

- This SOR is located in Russia, a country currently subject to international sanctions due to the ongoing conflict with Ukraine, resulting in the suspension of RMAP audits.

## Audit Risk

- **Under due diligence review.**
  - This smelter is under review by the RMI and cannot participate in the RMAP audit program.

## Sourcing Risk

- Recent market sentiment and consensus are that there is significant uncertainty around the Russian Federation, given its social and political instability.
  - The Ukrainian government as well as much of the international community assert that the actions of Russian forces during Russia's invasion of Ukraine violate international law.[131]

[131] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704

- The Secretary-General of the UN and the U.S. Secretary of State contend Russia's invasion of Ukraine has led to increased human rights violations.[132]
- A January 2022 CRS report cited the following conflict-related activities fueling continued U.S. sanctions on Russia: illicit trade with North Korea, the use of a chemical weapon, the use of energy exports as a coercive or political tool, malicious cyber-enabled activities and influence operations (including election interference), support for Venezuelan and Syrian governments, human rights abuses, and weapons proliferation.[133]
- Through corporate registry verification and business relationships investigations, Nadezhda Metallurgical Plant of MMC Norilsk Nickel's Polar Division[134] has been identified as holding ties to sanctioned entities/persons.[135]

- The RMI has suspended new RMAP assessments in Russia, effective as of September 19, 2022. "This suspension is informed by the RMI's commitment to compliance with all applicable laws and to its broader mission and vision."[136]

## Ruashi Mining SAS – CID003442

**Location:** Democratic Republic of the Congo
**Mineral:** Cobalt

### Geo Risk

- This SOR is located in the DRC, a covered country under the Dodd-Frank Act.

### Audit Risk

- **In communication.**
    - This smelter is in communication with the RMI.

### Sourcing Risk

- According to available RCOI data, this smelter sources from the DRC.

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[132] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
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[135] NAICS. (n.d.). High Risk/Cash Intensive Industries-ISIC4 4669 — Jewelry Store (NBFIs). https://www.naics.com/wp-content/uploads/2014/10/NAICS-ASSOCIATION-High-Risk-and-Cash-Intensive-NAICS-Codes-List.pdf; NAICS. (n.d.). High Risk/Cash Intensive Industries-ISIC4 6499 — Currency Exchange/Pawn Shop (MSBs/NBFIs). https://www.naics.com/wp-content/uploads/2014/10/NAICS-ASSOCIATION-High-Risk-and-Cash-Intensive-NAICS-Codes-List.pdf; SWFI. (n.d.) *List of 343 State Owned Enterprise Profiles by Region.* https://www.swfinstitute.org/profiles/state-owned-enterprise; NAICS. (n.d.). High Risk/Cash Intensive Industries-ISIC4 4719 — Retail (Cash Intensive Businesses). https://www.naics.com/wp-content/uploads/2014/10/NAICS-ASSOCIATION-High-Risk-and-Cash-Intensive-NAICS-Codes-List.pdf; NAICS. (n.d.). High Risk/Cash Intensive Industries-ISIC4 7911 — Travel agency (High Risk). https://www.naics.com/wp-content/uploads/2014/10/NAICS-ASSOCIATION-High-Risk-and-Cash-Intensive-NAICS-Codes-List.pdf; NameScan. (n.d.) Politically Exposed Person. https://namescan.io/freepepcheck; Gov.UK. (n.d.). HMT OFSI UK Sanctions List. https://www.gov.uk/government/publications/the-uk-sanctions-list
[136] RMI. (2022, September 19). *Notice Regarding RMAP Russia-Based Auditees.* https://www.responsiblemineralsinitiative.org/news/notice-regarding-rmap-russia-based-auditees/

# Excellen Minerals SARL – CID004686

**Location:** Democratic Republic of the Congo
**Mineral:** Cobalt

## Geo Risk

- This SOR is located in the DRC, a covered country under the Dodd-Frank Act.

## Audit Risk

- **Non-conformant.**
  - This SOR is non-conformant with the RMAP audit program.

## Sourcing Risk

- This smelter is located in the DRC, a conflict-affected and high-risk area (CAHRA) country and therefore it can be assumed that material is sourced from this area as well.

# LUILU RESSOURCES SAS – CID004691

**Location:** Democratic Republic of the Congo
**Mineral:** Cobalt

## Geo Risk

- This SOR is located in the DRC, a covered country under the Dodd-Frank Act.

## Audit Risk

- **Non-conformant.**
  - This SOR is non-conformant with the RMAP audit program.

## Sourcing Risk

- This smelter is located in the DRC, a conflict-affected and high-risk area (CAHRA) country and therefore it can be assumed that material is sourced from this area as well.

# Mica Refiners

## JSC Sludyanaya Fabrika – CID003664

**Location:** Russian Federation
**Mineral:** Mica

### Geo Risk

- This SOR is located in Russia, a country currently subject to international sanctions due to the ongoing conflict with Ukraine, resulting in the suspension of RMAP audits.

### Audit Risk

- **Under due diligence review.**
  - This smelter is under review by the RMI and cannot participate in the RMAP audit program.

### Sourcing Risk

- Recent market sentiment and consensus are that there is significant uncertainty around the Russian Federation, given its social and political instability.
  - The Ukrainian government and many in the international community maintain that actions taken by Russian forces during their invasion of Ukraine violate international law.[137]
  - The Secretary-General of the UN and the U.S. Secretary of State asserted that Russia's invasion of Ukraine has led to increased human rights abuses.[138]
  - According to a January 2022 report from the CRS, the following conflict-related activities have caused the U.S. to continue its sanctions against Russia: weapons proliferation, malicious cyber-enabled activities and influence operations (including election interference), illicit trade with North Korea, supporting the Syrian and Venezuelan governments, using energy exports as a coercive or political tool, human rights abuses, and the use of a chemical weapon.[139]
- The RMI has suspended new RMAP assessments in Russia, effective as of September 19, 2022. "This suspension is informed by the RMI's commitment to compliance with all applicable laws and to its broader mission and vision."[140]

[137] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[138] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[139] Congressional Reporting Services. (2022, January 18). *U.S. Sanctions on Russia.* https://sgp.fas.org/crs/row/R45415.pdf
[140] RMI. (2022, September 19). *Notice Regarding RMAP Russia-Based Auditees.* https://www.responsiblemineralsinitiative.org/news/notice-regarding-rmap-russia-based-auditees/

# Copper Refiners

## Compagnie Miniere de Musonoie Global SAS – CID003992

**Location:** Democratic Republic of the Congo
**Mineral:** Copper

### Geo Risk

- This SOR is located in the DRC, a covered country under the Dodd-Frank Act.

### Audit Risk

- **Outreach required.**
  - This smelter has not engaged with the RMAP audit program.

### Sourcing Risk

- This smelter is located in the DRC, a conflict-affected and high-risk area (CAHRA) country and therefore it can be assumed that material is sourced from this area as well.

## Chambishi Copper Smelter Limited – CID005284

**Location:** Zambia
**Mineral:** Copper

### Geo Risk

- This SOR is located in Zambia, a covered country under the Dodd-Frank Act.

### Audit Risk

- **Outreach required.**
  - This smelter has not engaged with the RMAP audit program.

### Sourcing Risk

- This SOR is located in Zambia, a covered country under the Dodd-Frank Act and therefore higher risk for sourcing from conflict-affected areas can be assumed.

# Copper Plant Polar Division of MMC Norilsk Nickel – CID004009

**Location:** Russian Federation
**Mineral:** Copper

## Geo Risk

- This SOR is located in Russia, a country currently subject to international sanctions due to the ongoing conflict with Ukraine, resulting in the suspension of RMAP audits.

## Audit Risk

- **Under due diligence review.**
  - This smelter is under review by the RMI and cannot participate in the RMAP audit program.

## Sourcing Risk

- Recent market sentiment and consensus are that there is significant uncertainty around the Russian Federation, given its social and political instability.
  - The Ukrainian government as well as much of the international community assert that the actions of Russian forces during Russia's invasion of Ukraine violate international law.[141]
  - The Secretary-General of the UN and the U.S. Secretary of State contend Russia's invasion of Ukraine has led to increased human rights violations.[142]
  - A January 2022 CRS report cited the following conflict-related activities fueling continued U.S. sanctions on Russia: illicit trade with North Korea, the use of a chemical weapon, the use of energy exports as a coercive or political tool, malicious cyber-enabled activities and influence operations (including election interference), support for Venezuelan and Syrian governments, human rights abuses, and weapons proliferation.[143]
- The RMI has suspended new RMAP assessments in Russia, effective September 19, 2022. "This suspension is informed by the RMI's commitment to compliance with all applicable laws and to its broader mission and vision."[144]

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[141] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[142] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[143] Congressional Reporting Service. (2022, January 18). *U.S. Sanctions on Russia.* https://sgp.fas.org/crs/row/R45415.pdf
[144] RMI. (2022, September 19). *Notice Regarding RMAP Russia-Based Auditees.* https://www.responsiblemineralsinitiative.org/news/notice-regarding-rmap-russia-based-auditees/

# Kyshtym Copper-Electrolytic Plant – CID004311

**Location:** Russian Federation
**Mineral:** Copper

## Geo Risk

- This SOR is located in Russia, a country currently subject to international sanctions due to the ongoing conflict with Ukraine, resulting in the suspension of RMAP audits.

## Audit Risk

- **Under due diligence review.**
  - This smelter is under review by the RMI and cannot participate in the RMAP audit program.

## Sourcing Risk

- Recent market sentiment and consensus are that there is significant uncertainty around the Russian Federation, given its social and political instability.
  - The Ukrainian government as well as much of the international community assert that the actions of Russian forces during Russia's invasion of Ukraine violate international law.[145]
  - The Secretary-General of the UN and the U.S. Secretary of State contend Russia's invasion of Ukraine has led to increased human rights violations.[146]
  - A January 2022 CRS report cited the following conflict-related activities fueling continued U.S. sanctions on Russia: illicit trade with North Korea, the use of a chemical weapon, the use of energy exports as a coercive or political tool, malicious cyber-enabled activities and influence operations (including election interference), support for Venezuelan and Syrian governments, human rights abuses, and weapons proliferation.[147]
- The RMI has suspended new RMAP assessments in Russia, effective as of September 19, 2022. "This suspension is informed by the RMI's commitment to compliance with all applicable laws and to its broader mission and vision."[148]

[145] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[146] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[147] Congressional Reporting Service. (2022, January 18). *U.S. Sanctions on Russia.* https://sgp.fas.org/crs/row/R45415.pdf
[148] RMI. (2022, September 19). *Notice Regarding RMAP Russia-Based Auditees.* https://www.responsiblemineralsinitiative.org/news/notice-regarding-rmap-russia-based-auditees/

# Nadezhda Metallurgical Plant of MMC Norilsk Nickel's Polar Division – CID004019

**Location:** Russian Federation
**Mineral:** Copper

## Geo Risk

- This SOR is located in Russia, a country currently subject to international sanctions due to the ongoing conflict with Ukraine, resulting in the suspension of RMAP audits.

## Audit Risk

- **Under due diligence review.**
  - This smelter is under review by the RMI and cannot participate in the RMAP audit program.

## Sourcing Risk

- Recent market sentiment and consensus are that there is significant uncertainty around the Russian Federation, given its social and political instability.
  - The Ukrainian government as well as much of the international community assert that the actions of Russian forces during Russia's invasion of Ukraine violate international law.[149]
  - The Secretary-General of the UN and the U.S. Secretary of State contend Russia's invasion of Ukraine has led to increased human rights violations.[150]
  - A January 2022 CRS report cited the following conflict-related activities fueling continued U.S. sanctions on Russia: illicit trade with North Korea, the use of a chemical weapon, the use of energy exports as a coercive or political tool, malicious cyber-enabled activities and influence operations (including election interference), support for Venezuelan and Syrian governments, human rights abuses, and weapons proliferation.[151]

The RMI has suspended new RMAP assessments in Russia, effective as of September 19, 2022. "This suspension is informed by the RMI's commitment to compliance with all applicable laws and to its broader mission and vision."[152]

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[149] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[150] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[151] Congressional Reporting Service. (2022, January 18). *U.S. Sanctions on Russia.* https://sgp.fas.org/crs/row/R45415.pdf
[152] RMI. (2022, September 19). *Notice Regarding RMAP Russia-Based Auditees.* https://www.responsiblemineralsinitiative.org/news/notice-regarding-rmap-russia-based-auditees/

## Ruashi Mining SAS – CID005015

**Location:** Democratic Republic of the Congo
**Mineral:** Copper

### Geo Risk

- This SOR is located in the DRC, a covered country under the Dodd-Frank Act.
- This smelter is located in the DRC, a conflict-affected and high-risk area (CAHRA).

### Audit Risk

- **Outreach required.**
  - This smelter has not engaged with the RMAP audit program.

### Sourcing Risk

- According to available RCOI data, this smelter sources from the DRC.

## Excellen Minerals SARL – CID004687

**Location:** Democratic Republic of the Congo
**Mineral:** Copper

### Geo Risk

- This SOR is located in the DRC, a covered country under the Dodd-Frank Act.

### Audit Risk

- **Non-conformant.**
  - This SOR is non-conformant with the RMAP audit program.

### Sourcing Risk

- This smelter is located in the DRC, a conflict-affected and high-risk area (CAHRA) country and therefore it can be assumed that material is sourced from this area as well.

## LUILU RESSOURCES SAS – CID004206

**Location:** Democratic Republic of the Congo
**Mineral:** Copper

### Geo Risk

- This SOR is located in the DRC, a covered country under the Dodd-Frank Act.

## Audit Risk

- **Non-conformant.**
  - This SOR is non-conformant with the RMAP audit program.

## Sourcing Risk

- This smelter is located in the DRC, a conflict-affected and high-risk area (CAHRA) country and therefore it can be assumed that material is sourced from this area as well.

# Nickel Refiners

## Joint-Stock Company Kola Mining & Metallurgical Company (JSC Kola MMC) – CID003958

**Location:** Russian Federation
**Mineral:** Nickel

### Geo Risk

- This SOR is located in Russia, a country currently subject to international sanctions due to the ongoing conflict with Ukraine, resulting in the suspension of RMAP audits.

### Audit Risk

- **Under due diligence review.**
  - This smelter is under review by the RMI and cannot participate in the RMAP audit program.

### Sourcing Risk

- Recent market sentiment and consensus are that there is significant uncertainty around the Russian Federation, given its social and political instability.
  - The Ukrainian government as well as much of the international community assert that the actions of Russian forces during Russia's invasion of Ukraine violate international law.[153]
  - The Secretary-General of the UN and the U.S. Secretary of State contend Russia's invasion of Ukraine has led to increased human rights violations.[154]
  - A January 2022 CRS report cited the following conflict-related activities fueling continued U.S. sanctions on Russia: illicit trade with North Korea, the use of a chemical weapon, the use of energy exports as a coercive or political tool, malicious cyber-enabled activities and influence operations (including election interference), support for Venezuelan and Syrian governments, human rights abuses, and weapons proliferation.[155]

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[153] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[154] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[155] Congressional Reporting Service. (2022, January 18). *U.S. Sanctions on Russia*. https://sgp.fas.org/crs/row/R45415.pdf

The RMI has suspended new RMAP assessments in Russia, effective as of September 19, 2022. “This suspension is informed by the RMI’s commitment to compliance with all applicable laws and to its broader mission and vision.”[156]

## Nadezhda Metallurgical Plant of MMC Norilsk Nickel’s Polar Division – CID004012

**Location:** Russian Federation
**Mineral:** Nickel

### Geo Risk

- This SOR is located in Russia, a country currently subject to international sanctions due to the ongoing conflict with Ukraine, resulting in the suspension of RMAP audits.

### Audit Risk

- **Under due diligence review.**
  - This smelter is under review by the RMI and cannot participate in the RMAP audit program.

### Sourcing Risk

- Recent market sentiment and consensus are that there is significant uncertainty around the Russian Federation, given its social and political instability.
  - The Ukrainian government as well as much of the international community assert that the actions of Russian forces during Russia’s invasion of Ukraine violate international law.[157]
  - The Secretary-General of the UN and the U.S. Secretary of State contend Russia’s invasion of Ukraine has led to increased human rights violations.[158]
  - A January 2022 CRS report cited the following conflict-related activities fueling continued U.S. sanctions on Russia: illicit trade with North Korea, the use of a chemical weapon, the use of energy exports as a coercive or political tool, malicious cyber-enabled activities and influence operations (including election interference), support for Venezuelan and Syrian governments, human rights abuses, and weapons proliferation.[159]

The RMI has suspended new RMAP assessments in Russia, effective as of September 19, 2022. “This suspension is informed by the RMI’s commitment to compliance with all applicable laws and to its broader mission and vision.”[160]

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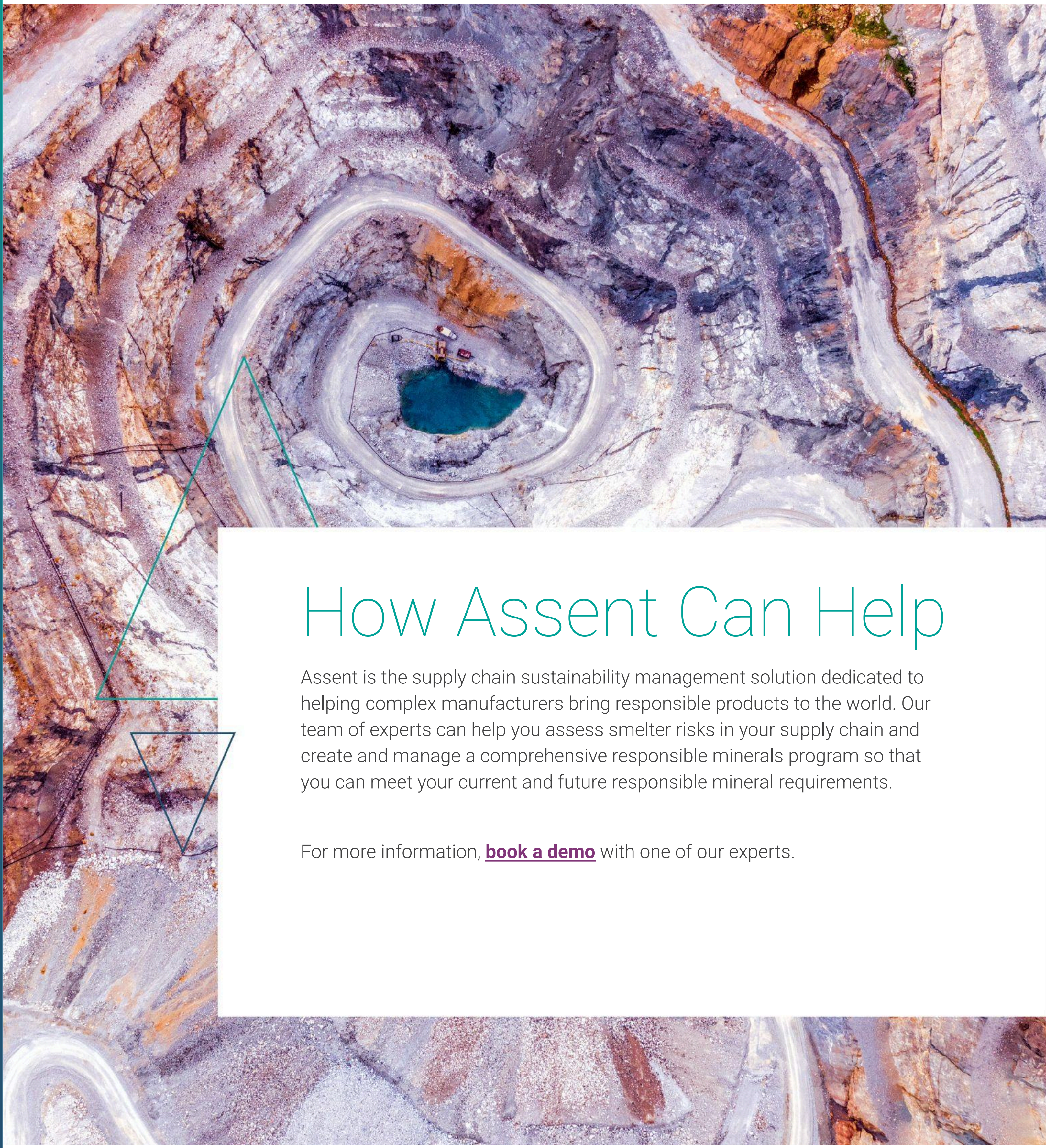
[156] RMI. (2022, September 19). *Notice Regarding RMAP Russia-Based Auditees.* https://www.responsiblemineralsinitiative.org/news/notice-regarding-rmap-russia-based-auditees/
[157] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[158] Congressional Research Service. (2022, March 18). *The Role of International Tribunals in the Response to the Invasion of Ukraine.* https://crsreports.congress.gov/product/pdf/LSB/LSB10704
[159] Congressional Reporting Service. (2022, January 18). *U.S. Sanctions on Russia.* https://sgp.fas.org/crs/row/R45415.pdf
[160] RMI. (2022, September 19). *Notice Regarding RMAP Russia-Based Auditees.* https://www.responsiblemineralsinitiative.org/news/notice-regarding-rmap-russia-based-auditees/



# How Assent Can Help

Assent is the supply chain sustainability management solution dedicated to helping complex manufacturers bring responsible products to the world. Our team of experts can help you assess smelter risks in your supply chain and create and manage a comprehensive responsible minerals program so that you can meet your current and future responsible mineral requirements.

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525 Coventry Road
Ottawa, ON  K1K 2C5
Canada

1 866 964 6931
info@assent.com
assent.com

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