



Third-Party Alignment Assessment Report CRAFT 2.1

August 25, 2024





RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

Executive Summary

RESPONSIBLE TRADE, LLC. (Responsible Trade) was engaged to conduct a third-party Alignment Assessment utilizing the OECD Alignment Assessment (AA) Methodology and tool. The AA is utilized to determine whether the Code of Risk-mitigation for ASM engaging in Formal Trade 2.1 (referred herein as “CRAFT” or “Code”) meets the criteria to be considered by the Responsible Minerals Initiative (RMI) Recognition Process as a “Level 2: Partial Recognition”. This report provides the background, scope, assessment methodology, results, conclusion, and limitations of the assessment for a Standards Only evaluation. This was a third-party AA conducted by Responsible Trade on behalf of RESOLVE and was not conducted by the OECD.

CRAFT is an open-source document, meaning that it is publicly available for any group of supply chain actors to utilize. The overall intent of the Code is to promote the sustainable social, environmental, and economic development of the Artisanal and Small-scale Mining (ASM) sector, by leveraging demonstrable conformance with due diligence requirements as an instrument for generating a positive development impact for ASM producers. CRAFT is global in geographical scope and is intended to be applicable to ASM Mineral Producers (AMPs) located in Conflict-Affected and High-Risk Areas (CAHRAs), as well as to AMPs located in low-risk areas not affected by conflict.¹ The commodities covered by CRAFT include Gold and associated precious metals; Tin, tantalum and tungsten (3T); Cobalt; and Coloured gemstones.

The Alignment Assessment was conducted to determine if CRAFT met the criteria outlined in the RMI’s Recognition Process version 1.4. for Level 2: Partial Recognition for “Standard ONLY” utilizing the OECD’s Alignment Assessment Methodology and Alignment Assessment Tool.

The Alignment Assessment consisted of a desk review of the relevant documentation of the CRAFT. The documents reviewed were the CRAFT 2.1 Volumes 1, 2A, 2B, 3 and 4. During the document review the assessor analyzed the requirements that the programme sets for AMPs and for companies participating in the AMP or Schemes. Programme requirements were compared against the relevant detailed recommendations of the OECD Guidance and its five steps. The RMI Recognition Process requires the use of the OECD AA Methodology and AA Tool for evaluation. Using the OECD AA Methodology and Tool, Responsible Trade reviewed CRAFT 2.1 and assigned the Tool elements one of the following ratings; Fully Aligned, Partially Aligned, or Not Aligned.

Based on the OECD Alignment Assessment Methodology, Responsible Trade has concluded CRAFT 2.1 is Fully Aligned for Standards when evaluated as a CRAFT Scheme. This is based on the results of the Tools three sections with Section A at 100% for Fully Aligned and Sections B+C have greater than 80% (actual 100%) Fully Aligned.

CRAFT 2.1 is now designed to be a stand-alone Upstream Assurance Mechanism (UAM) framework and is found to be Fully Aligned as a Standard and meets the RMI Partial Recognition for ‘Standards ONLY’.

¹ CRAFT Volume 1



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

Contents

Executive Summary	i
Introduction	1
Background	1
Scope.....	3
Assessment Methodology.....	3
Assessment Team and Dates	4
Results	4
RMI Upstream Assurance Mechanism Recognition Process Alignment Results.....	4
Conclusion	5
Limitations	5
Annex 1 Completed Alignment Assessment Tool.....	6



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

Introduction

RESPONSIBLE TRADE, LLC. (Responsible Trade) was engaged to conduct a third-party Alignment Assessment utilizing the OECD Alignment Assessment (AA) Methodology and Tool. The AA Methodology and Tool was utilized to determine whether the Code of Risk-mitigation for ASM engaging in Formal Trade version 2.1 (referred herein as “CRAFT” or “Code”) meets the criteria to be considered by the Responsible Minerals Initiative (RMI) as a “Level 2: Partial Recognition, Standards Only” as defined by the RMI Recognition Process (version 1.4).

CRAFT is “intended to serve as an instrument for Artisanal and Small-scale Miners (ASM) and the downstream industry to validate its eligibility to sell and source minerals and metals originating from ASM in conformance with the OECD Minerals Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Due Diligence Guidance) and legislations derived from it, like the EU regulation on conflict minerals entering in force in 2021.” CRAFT is composed of policies and standards for both AMPs (Artisanal and Small-scale Mineral Producers) and Schemes, which is defined as groups of supply chain actors that “*incorporate and use the CRAFT for sourcing from ASM or for supporting ASM development.*” The scope of this AA was limited to the written Code itself (i.e. Standards Only) and does not assess the implementation of any program or Scheme.

This assessment was conducted using the OECD Due Diligence Guidance METHODOLOGY FOR THE ALIGNMENT ASSESSMENT OF INDUSTRY PROGRAMMES WITH THE OECD MINERALS GUIDANCE 2018 (AA Methodology) and associated Alignment Assessment Tool (AA Tool). In addition, the RMI Recognition Process (version 1.4) was used and defines a “Level 2: Partial Recognition Upstream Mechanism” as:

Alignment of the Upstream Mechanism’s Standard with the OECD Due Diligence Guidance (DDG), demonstrated through an OECD Alignment Assessment using the OECD’s Alignment Assessment Methodology and Alignment Assessment Tool for:

- Standard Only

Or

- Partial Implementation: standard, governance and select element(s) of Upstream Assurance Mechanism that the program has implemented:
 - Traceability / Chain of Custody
 - Mine-site monitoring
 - Incident collection
 - Due Diligence verification
 - Other

This report provides the background, scope, assessment methodology, results, conclusion, and limitations of the assessment for a Standard Only evaluation. This was a third-party AA conducted by Responsible Trade on behalf of RESOLVE and was not conducted by the OECD.

Background



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

CRAFT was created with funding from the European Program for Responsible Minerals (EPRM <https://europeanpartnership-responsibleminerals.eu>) and was developed by the Alliance for Responsible Mining (ARM) Standards Team as part of the CAPAZ Project. It was implemented by ARM (www.responsiblemines.org) and RESOLVE (www.resolve.ngo) and the CRAFT Standard Committee convened by ARM, with support by the CRAFT Advisory Group convened by RESOLVE.²

CRAFT is an open-source document, meaning that it is publicly available for any group of supply chain actors to utilize. The overall intent of the Code is to promote the sustainable social, environmental, and economic development of the ASM sector, by leveraging demonstrable conformance with due diligence requirements as an instrument for generating a positive development impact for ASM producers. CRAFT expects to be a tool principally for the miners, to empower them to understand and comply with market expectations and due diligence needs. The CRAFT is also expected to be key for downstream actors to enable trade with the ASM supply-chain.³

CRAFT is global in geographical scope and is intended to be applicable to AMPs located in Conflict-Affected and High-Risk Areas (CAHRAs), as well as to AMPs located in low-risk areas not affected by conflict.⁴ The commodities covered by CRAFT include:

- **Gold and associated precious metals** (silver and/or in some cases platinum group metals). Typically sold by AMPs as ore, concentrate or doré.
- **Tin, tantalum and tungsten (3T)**. Typically sold by AMPs as ore or concentrate.
- **Cobalt**. Typically sold by AMPs as ore or concentrate.
- **Coloured gemstones**. Typically sold by AMPs as rough (including mineral specimen) or cut and polished stones.

CRAFT was not originally designed as an Upstream Assurance Mechanism⁵ (UAM) standard, but as a tool for supply chains (entities downstream of the AMP) to use to support reasonable due diligence. Supply chain schemes that incorporate and use the CRAFT for sourcing from ASM or for supporting ASM development are referred to as CRAFT Schemes⁶. In terms of defining a UAM within the CRAFT terminology a CRAFT Scheme could meet that definition. To address this design gap CRAFT 2.0 was revised to allow UAMs or Schemes to use CRAFT 2.1 in the establishment of their program. However, different Schemes may choose to implement the CRAFT standard differently; while assessing implementation was not within the scope of this assessment, it is important to note that merely utilizing the CRAFT standard does not automatically make a company's mineral due diligence program OECD aligned.

² CRAFT Volume 1

³ CRAFT Volume 1

⁴ CRAFT Volume 1

⁵ RMI RMAP Standards for Tin and Tantalum, Tungsten, Gold, and Cobalt and CRAFT 2.1 use the term Upstream Assurance Mechanism. The RMI Recognition Process uses the term Upstream Mechanism. To avoid confusion in the report, the term Upstream Assurance Mechanism is used throughout except when directly referencing the text from the RMI Recognition Process.

⁶ CRAFT Volume 1



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

Scope

The OECD AA Methodology evaluates the alignment of a programme with the recommendations of the OECD Guidance. A structured assessment is undertaken against detailed criteria that are set out in the AA Tool⁷. Each criterion is linked to relevant recommendations within the OECD Guidance. The Alignment Assessment criteria are each individually rated by the evaluator against two aspects:

- a) Standards: The extent to which the recommendations from the OECD Guidance have been incorporated into the programme's policies, standards, procedures and operating requirements set out for companies; and
- b) Implementation: The extent to which it can be reasonably concluded that the criterion is implemented by the programme, including by deploying the necessary measures to ensure compliance and securing adequate remedial action in cases where companies participating in the programme and/or auditors do not adhere to the programme's policies and standards (when applicable to them).⁸

The CRAFT standard Alignment Assessment consisted of an evaluation of the Standards elements outlined in the AA Methodology. The Alignment Assessment did not assess implementation as CRAFT is designed as a tool for an UAM to use in their program.

While CRAFT was not originally designed as an UAM, the assessment evaluated how the updates in CRAFT 2.1 would support an UAM implementation. CRAFT scope does not include smelters or refiners. As such, the AA did not evaluate elements that relate to smelters, refiners, or downstream (beyond the smelters or refiners), other metals, elements as they relate to audits (OECD Step 4), or implementation.

Additionally, the AA did not assess Programme Governance criteria as there was no CRAFT Scheme (programme) to assess against.

Assessment Methodology

The AA consisted of a desk review of the relevant documentation of the CRAFT. The documents reviewed were the CRAFT 2.1 Volumes 1, 2A, 2B, 3 and 4. During the document review the assessor analyzed the requirements that the programme sets for AMPs and for companies participating in the AMP (i.e. Schemes). The focus was on the five-step due diligence framework in the OECD Guidance. Programme requirements were compared against the relevant detailed recommendations of the OECD Guidance. Using the OECD AA Methodology and Tool, Responsible Trade reviewed CRAFT 2.1 and assigned the Tool elements one of the following ratings:

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

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

⁷ <https://mneguidelines.oecd.org/OECD-Due-Diligence-Alignment-Assessment-Tool.xlsm>

⁸ *Methodology for the Alignment Assessment of Industrial Programs with the OECD Minerals Guidance*



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

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

Upon completion of its review Responsible Trade shared the draft report with ARM, RESOLVE, OECD and RMI for comment. Once comments were resolved Responsible Trade issued this final report.

Assessment Team and Dates

The Responsible Trade Assessment Team consisted of Mike Loch, Project Coordinator and Assessment Leader and Kyle Loch and Ava Leipzig as Assessment reviewers. The Alignment Assessment was conducted by qualified, independent third-party assessors, free of conflicts of interest, having demonstrated relevant experience and approved by the RMI.

The AA was carried out from April 23 through May 24 2024.

Results

The results are presented based on the components of the OECD Alignment Assessment tool for both AMPs (Section B) and CRAFT Schemes as a UAM (Sections A, B, and C):

1. Section A: Overarching Due Diligence Principles within Program Standards and Guidance (As it relates to CRAFT Schemes as a UAM),
2. Section B: Alignment of Programme Requirements with the Five-Step Due Diligence Framework (As it relates to AMPs and CRAFT Schemes as a UAM), and
3. Section C: Specific Responsibilities of Programmes (As it relates to CRAFT Schemes as a UAM)

A summary of the assessment results for CRAFT Schemes is presented in Table 1. The combined Alignment percentages for Section B and C as a CRAFT Scheme is 100%, and for Sections A, B, and C is 100%.

Section	A	B	C	B+C	A+B+C
Total Number of Applicable Elements	14	51	4	55	69
Fully Aligned	14	51	4	55	69
Partially Aligned	0	0	0	0	0
Not Aligned	0	0	0	0	0
Section Alignment Score	100%	100%	100%	100%	100%

RMI Upstream Assurance Mechanism Recognition Process Alignment Results

The RMI Recognition Process requires the use of the Alignment Methodology and Alignment Assessment Tool developed by OECD. The methodology has three levels of conformance. As stated in the methodology:

The overall conclusion of the Alignment Assessment should be calculated and reported as follows:



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

- *Fully Aligned: (Section A = 100% of criteria 'Fully Aligned') + (Sections B and C = 80% or more of criteria 'Fully Aligned') + (no 'Not Aligned' criteria)*
- *Partially Aligned: All other combinations between 'Fully Aligned' and 'Not Aligned' criteria*
- *Not Aligned: (Section A = 50 % of criteria 'Fully Aligned') OR (Sections B and C = 20% or more of criteria are 'Not Aligned')*

Based on the OECD Alignment Assessment Methodology, Responsible Trade has concluded CRAFT 2.1 is Fully Aligned for Standards when evaluated as the CRAFT Scheme. This is based on the result that Section A is 100% for Fully Aligned and Sections B+C have greater than 80% (actual 100%) Fully Aligned.

The specific results by section and results of each element assessed are described in Annex 1.

Conclusion

CRAFT 2.1 is now designed to be a stand-alone UAM framework and is found to be Fully Aligned as a Standard and meets the RMI Partial Recognition for 'Standards ONLY'. Of note, this assessment does not cover implementation, which will need to be independently assessed for each CRAFT Scheme that would like to be recognized by the RMI Upstream Mechanism Process as Full Recognition.

Limitations

The assessment was completed with no limitations regarding the cooperation of ARM, RESOLVE and RMI. The assessors had access to all documents requested.

The OECD Alignment Assessment Tool, as built, is not functioning properly, has incomplete ratings and is not user friendly. For instance, in the Alignment Assessment tab column J where you write down notes and document your evidence, once you make the initial input, if you try to make edits or add additional information, all the initial input is deleted. Another issue is that the Results and Charts as produced are not accurate. In the bar charts, the calculated percentages are not properly proportioned in several of the sections. When trying to reproduce either the tables or graphics, the tool does not allow the user to cut and paste into reports. This is one of the reasons the charts have not been included in this report. While the content of the tool is useful, the OECD should fix the deficiencies identified above in the tool. This is the same limitation identified in 2020.



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

Annex 1 Completed Alignment Assessment Tool

The following table contains the findings for each of the applicable assessment criteria. It highlights where in the AA criteria are met.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
<i>Due Diligence is an On-going Proactive and Reactive Process</i>				
A.1	The Programme explicitly recognizes due diligence as an ongoing process to be undertaken by companies.	All	Fully Aligned	CRAFT 2.1 Volume 3 Guiding Principles for CRAFT Schemes states "Regardless of the extent of due diligence provided by a UA-Scheme, it ultimately always remains the individual responsibility of the Scheme Members to undertake due diligence as an ongoing proactive process, to react to changes of circumstances and risks in the supply chain, and to progressively improve their due diligence activities and risk management performance over time. "
A.2	The Programme expects companies to proactively carry out due diligence and to react to changes of circumstances and risks in the supply chan.	All	Fully Aligned	<p>POLICIES AND STANDARDS:</p> <p>CRAFT 2.1 Volume 3 Guiding Principles for CRAFT Schemes states "Regardless of the extent of due diligence provided by a UA-Scheme, it ultimately always remains the individual responsibility of the Scheme Members to undertake due diligence as an ongoing proactive process, to react to changes of circumstances and risks in the supply chain, and to progressively improve their due diligence activities and risk management performance over time. "</p> <p>Volume 1. pg. 4 Figure 1: The organizational scope of CRAFT covers miners and optionally processors and/or aggregators at the upstream end of the supply chain, down to the point (i.e., red dot, point of assurance) where the mined and eventually processed product enters the supply chain downstream of the CRAFT scope.</p>
<i>Due Diligence is dynamic and improves over time</i>				



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
A.3	If a programme choses to make a final determination on a company or its products, such determination should be based on the conformity of the companies' due diligence or sourcing practices with the OECD due diligence guidance.	All	Fully Aligned	<p>POLICIES AND STANDARDS:</p> <p>CRAFT 2.1 Volume 3 Guiding Principles for CRAFT Schemes states:</p> <p>"Some CRAFT Schemes might aspire to act as Upstream Assurance Mechanisms (UAM) and/or even obtain recognition as UAMs through an OECD Alignment Assessment. For a CRAFT Scheme to act as an UAM (a "CRAFT UA-Scheme" or simply "UA-Scheme"), the UA-Scheme's supply chain – originating from the AMP all along the way down to the smelter or refiner (or a similar pinch point in the audit scope of an institutionalized mechanism) – needs to be fully conformant with the OECD Minerals Guidance. This implies that such a Scheme provides assurance that production practices of affiliated AMPs and due diligence or sourcing practices of supply chain actors sourcing from these AMPs conform with the OECD Minerals Guidance."</p>
A.4	The Programme expects companies to progressively improve their due diligence activities and risk management performance over time.	All	Fully Aligned	<p>POLICIES AND STANDARDS:</p> <p>Craft 2.1 Volume 3 Section 3 states, "These responsibilities are not intended to substitute responsibilities of Scheme Members. Regardless of the extent of due diligence provided by a UA-Scheme, it ultimately always remains the individual responsibility of the Scheme Members to undertake due diligence as an ongoing proactive process, to react to changes of circumstances and risks in the supply chain, and to progressively improve their due diligence activities and risk management performance over time. "</p>



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
A.5	The Programme encourages companies to source responsibly from conflict-affected or high-risk areas and, where relevant, from artisanal and small-scale mineral producers.	All	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1 Volume 1 "Introduction and General Characteristics states: "CRAFT has a global scope, without any excluded areas. CRAFT is intended to be applicable to AMPs located in Conflict-Affected and High-Risk Areas (CAHRAs), as well as to AMPs located in low-risk areas not affected by conflict. Some requirements of CRAFT only apply if the AMP is located in a CAHRA."</p> <p>"Modules 1 to 4 cover the requirements aligned with the OECD DDG. Their fulfilment is therefore in practice "mandatory" for any AMP wishing to engage with formal markets. Module 5 formulates requirements that go beyond the OECD due diligence guidance and is, therefore "aspirational". The "High Risks" in Module 5 covers the majority (although not all) of aspects that BUYERS committed to responsible sourcing may expect from their suppliers. By progressively conforming with these aspirational requirements according to their own needs and goals, AMPs advance in their development and can further improve their access to responsible markets."</p> <p>The whole intent of CRAFT Code is to "encourages companies to source responsibly from conflict-affected or high-risk areas and, where relevant, from artisanal and small-scale mineral producers".</p>
<i>Due Diligence is risk based</i>				



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
A.6	The Programme expects companies' due diligence activities to be guided by their own risk assessments.	All	Fully Aligned	<p>POLICIES AND STANDARDS:</p> <p>CRAFT 2.1 Volume 3 "Guiding Principles for CRAFT Schemes states: "As indicated in Volume 1, CRAFT Schemes have no obligation to carry out due diligence or verification of the content of CRAFT Reports. Their responsibility is to monitor the affiliation status of AMPs based on completeness of the CRAFT Reports presented by the AMP. As per the OECD DDG, risk-based independent third-party verification (audit) is the responsibility of the supply chain actors that source or wish to source from ASM (i.e., BUYERS), not the responsibility of the ASM sector or CRAFT Schemes (If the Scheme only contains an AMP) unless the Scheme contains a BUYER. However, CRAFT Schemes may carry out due diligence or third-party verification as seen appropriate."</p>



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
A.7	The Programme expects companies' due diligence activities to consider at least all risks covered in Annex II (serious abuses associated with the extraction, transport or trade of minerals, direct or indirect support to non-state armed groups, public or private security forces, bribery and fraudulent misrepresentation of the origin of minerals, money laundering, payment of taxes, fees and royalties due to governments and bribery).	All	Fully Aligned	<p>POLICIES AND STANDARDS:</p> <p>CRAFT 2.1 Volume 2A and 2B "Requirements for ASM Mineral Producers Commodity-specific Requirements" state all the Annex II risks (serious abuses associated with the extraction, transport or trade of minerals, direct or indirect support to non-state armed groups, public or private security forces, bribery and fraudulent misrepresentation of the origin of minerals, money laundering, payment of taxes, fees and royalties due to governments and bribery).</p> <p>CRAFT 2.1 Volume 3 "Guiding Principles for CRAFT Schemes" states: "a CRAFT UA-Scheme shall; I conduct due diligence risk assessments, to ensure that the Scheme Member is legal and that no condition exists that would require others downstream of the Scheme Members to disengage because of supply chain risks related to Annex II of the OECD Minerals Guidance."</p>



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
A.8	The programme expects that the measures that a company takes to conduct due diligence should be commensurate to the severity and likelihood of the identified risks.	All	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1 Volume 3 3.1.3a states: "Due diligence services provided by a CRAFT UA-Scheme follow the concept laid out in the OECD Minerals Guidance that Scheme Members retain individual responsibility for their due diligence (see 3.1.1.) but may cooperate through joint initiatives and joint work which duly takes into consideration the circumstances specific to each Scheme Member. Specific responsibilities related to the joint work with AMPs and Scheme Members are addressed in the chapters 3.2 and 3.3. General due diligence principles of CRAFT UA-Schemes for their own processes are: a) The measures that a CRAFT UA-Scheme takes to conduct due diligence shall always be commensurate to the severity and likelihood of the identified risks."</p>
A.9	The programme includes in the definition of red flags considerations of location of mineral origin and transit, supplier characteristics and trade-related circumstances.	All	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1 Volume 3. Section 3.1.2 states: "It is one of the core responsibilities of a CRAFT UA-Scheme to map the factual circumstances of the Scheme's supply chain, including the origin of minerals and the activities/relationships of suppliers (AMPs and Scheme Members). a) UA-Schemes shall determine – as Joint Work of affiliated AMPs and Scheme Members – if parts of the supply chain are located in a conflict-affected or high-risk area (CAHRA) or if red flag conditions apply to locations of mineral origin and transit, supplier characteristics and trade-related circumstances. ... c) To determine Red Flag considerations, the CRAFT UA-Schemes shall apply the definition of the OECD Minerals Guidance"</p>



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
A.10	The Programme expects that due diligence activities on red-flagged supply chains should involve on-the-ground assessments, to be undertaken by upstream companies. Upstream companies may cooperate through joint initiatives but retain individual responsibility for their due diligence and should ensure that all joint work duly takes into consideration circumstances specific to the individual company.	All	Fully Aligned	<p>POLICIES AND STANDARDS:</p> <p>CRAFT 2.1 Volume 3. Section 3.1.3 states: "Due diligence services provided by a CRAFT UA-Scheme follow the concept laid out in the OECD Minerals Guidance that Scheme Members retain individual responsibility for their due diligence (see 3.1.1.) but may cooperate through joint initiatives and joint work which duly takes into consideration the circumstances specific to each Scheme Member."</p> <p>Section 3.1.3d states: "d) Due diligence activities on red-flagged supply chains shall always involve on-the-ground assessments. For that purpose, the UA-Scheme shall establish on-the-ground assessment teams of suitably qualified and independent assessors with appropriate capabilities and access rights. As Scheme Members retain individual responsibility for their due diligence, they shall always be invited and encouraged to actively participate in the on-the-ground assessment teams. It is their responsibility to ensure that circumstances specific to their operations (of which the Scheme may not be aware) are duly taken into consideration. On-the-ground assessments shall cover all risks referenced in the corresponding Supplement of the OECD Minerals Guidance.</p> <p>These risks are reflected in the requirements of Volume 2 of the CRAFT Code. To ensure full alignment with the OECD Minerals Guidance, the UA-Scheme shall consult the corresponding Supplement."</p>
<i>Due diligence is undertaken in good faith</i>				



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
A.11	The Programme explicitly recognizes that companies should use good faith and reasonable efforts in their due diligence, taking into account factors such as the size of the enterprise, the location of the activities, the situation in a particular country, the sector and nature of the products or services involved.	All	Fully Aligned	<p>POLICIES AND STANDARDS:</p> <p>CRAFT 2.1 Volume 3 Section 3.1.1 b) iv states: "iv. The Scheme Member and the UA-Scheme agree on the extent of due diligence and assurance services to be provided by the CRAFT UA-Scheme. These services shall be carried out using good faith and reasonable efforts and taking into account factors such as the size and activities of the Scheme Members' company, the type of materials and location of premises, the situation of the particular country and sector and nature of the products or services involved.</p> <p>To ensure that sufficient resources are made available to support the operation and monitoring of supply chain due diligence processes, contributions and responsibilities of the parties need to be clearly defined. "</p> <p>Section 3.1.2 c) states: "The assessment of supplier red flags of the UA-Scheme shall cover all affiliated AMPs and all Scheme Members, taking a risk-based approach and using good faith and reasonable efforts. In any case, assurance can only be provided for the mineral products originating from within the scope of the UA-Scheme's supply chain (see Figure 1)"</p>
<i>Companies are responsible for ensuring that appropriate due diligence is undertaken</i>				



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
A.12	Responsibility for determining the actions that a company undertakes in response to identified risks rests with the company's management.	All	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1 Volume 1 states: "Carrying out due diligence is an added value service beyond the scope of the CRAFT and is always the responsibility of the BUYER. Volume 3.1.1 b I states: "The Scheme Member also recognizes that the responsibility for determining the actions that the company undertakes in response to identified risks rests with the company's management." Volume 3 3.1. e) States: "Findings of risk assessment always need to be reported to the designated senior management (i.e. the "Responsible Person" of the AMP or the Scheme Member, and senior management of the UA-Scheme), outlining the information gathered and the actual and potential risks identified in the supply chain risk assessment.</p>
A.13	The Programme states clearly that the use of Industry Programmes, Institutionalised Mechanisms or multi-stakeholder initiatives does not release companies from being responsible for the scope and quality of due diligence in their own supply chains and for reporting on the due diligence that is undertaken in their supply chains.	All	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1 Volume 3 Section 3.1.1bi: " The Scheme Member also recognizes that the responsibility for determining the actions that the company undertakes in response to identified risks rests with the company's management." Section 3.2 a) states: "UA-Schemes need to inform AMPs, and AMPs need to recognize in writing that participation in the Scheme and due diligence carried out by the Scheme does not release them from being responsible for the scope and quality of their own due diligence in their own internal supply chain and for reporting on the due diligence that they undertake in their internal supply chains."</p>



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
<i>Due Diligence is Global in scope</i>				
A.14	Due diligence should be global in scope unless a programme is designed to cover a specific geography or region only. In particular any programme designed to implement step 4 should be global in scope.	All	Fully Aligned	POLICIES AND STANDARDS: CRAFT 2.1 Volume 1-4 is GLOBAL. It is a global standard and covers more than 3TG. Precious Stones and cobalt are also included.
B	Alignment of Programme requirements with the five-step due diligence framework			
Step 1: Establish strong company management systems				
Requirements set by Programme for companies subject to audit under the program				



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.1	Adopt, and clearly communicate to suppliers and the public, a policy, applicable to the company and its suppliers, providing the principles and standards for identifying and managing the risks in the supply chain of minerals potentially from conflict-affected or high-risk areas, against which the company will assess itself and the activities and relationships of suppliers.	All	Fully Aligned	<p>CRAFT 2.1 Volume 1 Section 4.1: "Every CRAFT Report shall include a non-confidential, public summary. that communicates the AMP's supply chain policy of fulfilling the CRAFT requirements against which the AMP assesses itself (and against which it is expected that BUYERS will conduct due diligence) as well as description of risk identified and mitigation efforts with due consideration to business confidentiality."</p> <p>Volume 2A M.1/5.2.3/R.2 states: The AMP declares that it is committed to responsible production of minerals and metals in alignment with the OECD Minerals Guidance and to further progress towards good and best ASM practice. For this purpose, the AMP adopts the CRAFT Code as its Management System for risk identification and mitigation, implements a supply chain policy aligned with Annex II of the OECD Minerals Guidance by declaring that assessment and management of the Annex II risks, as well as the conformity with all CRAFT requirements is the core element of its supply chain policy and commits to progressively fulfil all requirements of the CRAFT Code.</p> <p>Volume 3 Section 3.1a: "Monitor and verify that – through conformance with Module 1 of Volume 2 – the Scheme Member has adopted CRAFT as its management system and has implemented a supply chain policy aligned with Annex II of the OECD Minerals Guidance by committing to work towards full conformity with all CRAFT requirements."</p>



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.2	Ensure that the supply chain policy is consistent with the standards provided in Annex II of the Guidance.	All	Fully Aligned	<p>POLICIES AND STANDARDS:</p> <p>CRAFT 2.1 Volume 1 Chapter 1 states: "ASM mineral producers act and operate in accordance with or exceeding the minimum parameters established by the OECD Minerals Guidance for responsible mineral supply chains (i.e. the "Model Supply Chain Policy" provided in Annex II of the OECD Minerals Guidance). "</p> <p>Volume 1 section 3.2 states: "Modules 1 to 4 cover the requirements which ensure that the AMP's supply chain policy and implementation are consistent with the "Model Supply Chain Policy" provided in Annex II of the OECD Minerals Guidance. "</p> <p>Volume 2A M.1/5.2.3/R.2 states: "For this purpose, the AMP adopts the CRAFT Code as its Management System for risk identification and mitigation, implements a supply chain policy aligned with Annex II of the OECD Minerals Guidance by declaring that assessment and management of the Annex II risks"</p> <p>Volume 3 Section 3.3.2c states "Elaborate, adopt, and clearly communicate to suppliers and the public, their own supply chain policy, specific to their business context, applicable to the company and its suppliers, and consistent with the standards provided in Annex II of the OECD Minerals Guidance. "</p>



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.3	Within the supply chain policy, set out a clear and coherent management process for risk management. Commit to the due diligence steps as described in Annex I and, where relevant, the Supplement.	All	Fully Aligned	<p>POLICIES AND STANDARDS:</p> <p>CRAFT 2.1 Volume 1, Section 4.1 states: "CRAFT implementation consists of a clear and coherent management process for risk management, designed in analogy to Annex I of the OECD Minerals Guidance and consisting of the subsequent, ongoing and repetitive steps of establishing (and improving) a management system (Step 1, accomplished by adopting CRAFT), risk assessment (Step 2), risk mitigation (Step 3), verification (Step 4) and reporting (Step 5). "</p> <p>Volume 2A M.1/5.2.3/R.2 states: "Criteria: The public CRAFT Report, accessible to BUYERS and the public, contains this declaration and commitment.</p> <p>To implement CRAFT as adopted management system, the AMP repeats at least annually the ongoing, proactive and reactive steps of risk assessment (Step 2), risk mitigation (Step 3), verification (Step 4) and reporting (Step 5) as described in chapter 4 of Volume 1."</p> <p>Volume 3 3.3.2 c) states: 'Scheme Members shall: The Scheme Member's own supply chain policy is expected to provide the principles and standards for identifying and managing the risks in their supply chain of minerals, against which the company will assess itself and the activities and relationships of suppliers. It shall set out a clear and coherent management process for risk management and commit to the due diligence steps as described in Annex I and the applicable Supplement of the OECD Minerals Guidance."</p>



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.4	Structure internal management to support supply chain due diligence and assign authority and responsibility to senior staff with the necessary competence, knowledge and experience to oversee supply chain due diligence.	All	Fully Aligned	<p>POLICIES AND STANDARDS:</p> <p>CRAFT 2.1 Volume 2A M.1/5.2.11/R.1 states: "The Responsible Person is appointed by and reports to the decision-making leadership structure. The Responsible Person is a senior staff or representative of the decision-making leadership structure with the necessary knowledge/experience and competence/authority to oversee all aspects of CRAFT implementation, and is entitled to make claims on behalf of the AMP (i.e. issue the CRAFT Report). The Responsible Person reports the results of risk assessment to the decision-making leadership structure of the AMP, outlining the information gathered and the actual and potential risks identified, and proposes a risk management plan for risk mitigation.</p> <p>The Responsible Person implements the risk management plan approved by the decision-making leadership structure of the AMP, monitors risk mitigation and reports back on performance."</p> <p>Volume 3 Section 3.1.1 b) iii states: "The Scheme Member nominates a Responsible Person, who is accountable for the implementation of CRAFT. This person must count on the necessary competence, knowledge and experience and be assigned authority and responsibility to oversee supply chain due diligence. As counterpart, the UA-Scheme nominates its responsible point of contact (e.g. task manager)."</p> <p>M.1/5.2.11/R.1 states: The AMP has nominated a Responsible Person for the implementation of CRAFT. Criteria: The responsible person is entitled to make claims on behalf of the AMP (i.e., issue the CRAFT Report). While the requirement of assigning a person is addressed, no requirement of necessary competence, knowledge and experience.</p>



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.5	Ensure that sufficient resources are made available to support the operation and monitoring of supply chain due diligence processes, taking into account company size, location and circumstances.	All	Aligned	<p>POLICIES AND STANDARDS:</p> <p>CRAFT 2.1 Volume 3 Section 3.1.1 b) iv states: "iv. The Scheme Member and the UA-Scheme agree on the extent of due diligence and assurance services to be provided by the CRAFT UA-Scheme. These services shall be carried out using good faith and reasonable efforts and taking into account factors such as the size and activities of the Scheme Members' company, the type of materials and location of premises, the situation of the particular country and sector and nature of the products or services involved.</p> <p>To ensure that sufficient resources are made available to support the operation and monitoring of supply chain due diligence processes, contributions and responsibilities of the parties need to be clearly defined. "</p>
B.6	Establish the necessary organisational structure and communication processes that will ensure critical information about supply chain due diligence, including the company's policy, reaches relevant employees and suppliers.	All	Aligned	<p>POLICIES AND STANDARDS:</p> <p>CRAFT 2.1 Volume 2A M.1/5.2.3/R.4 states: "The AMP ensures that the requirements of the CRAFT Code, which the AMP has adopted as its supply chain policy and committed to fulfil, are communicated in a way that reaches all Members"</p> <p>Volume 3 Section 3.1. a) states: " CRAFT UA-Schemes are responsible for establishing the necessary organizational structure and communication processes that will ensure critical information about supply chain due diligence, including the Scheme's policy, reaches relevant employees, AMPs, Scheme Members, final BUYERS such as smelter or refiner sourcing mineral products originating from the AMPs affiliated to the Scheme, as well as any other stakeholder with a legitimate interest such as government agencies. "</p>



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.7	Assist suppliers in building due diligence capacities and provide training as appropriate to employees and suppliers on the policy and its practical application.	All	Aligned	<p>POLICIES AND STANDARDS:</p> <p>CRAFT 2.1 Volume 3 Section 3.1.4 states: "Capacity building of AMPs and Scheme Members-Experience has shown that most AMPs and Scheme Members such as intermediate traders, consolidators, processors, exporters or similar in producer countries of the Global South (with some remarkable exceptions) have limited knowledge of the OECD Minerals Guidance and its implications for their businesses. Capacity building is therefore a core activity of most CRAFT Schemes. For CRAFT UA-Schemes, it is a responsibility. CRAFT UA-Schemes shall provide capacity building and training to Members of AMPs and Scheme Members, including their owners, managers and employees;</p>
B.8	Ensure internal accountability with respect to the implementation of the supply chain due diligence process.	All	Aligned	<p>POLICIES AND STANDARDS:</p> <p>Craft 2.1 Volume 2A Section M.1/5.2.11/R.1 states: 'The AMP has nominated a Responsible Person, who acts on behalf of the AMP's decision-making leadership structure and is accountable for the implementation of CRAFT.'</p> <p>Volume 3 Section 3.1 states: b) UA-Schemes are responsible to ensure internal accountability with respect to the implementation of the supply chain due diligence process. Due diligence roles, responsibilities and reporting obligations within the UA-Scheme's organization as well as between the UA-Scheme's organization, AMPs and Scheme Member shall be clearly defined and be fit for the purpose.</p>



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.9	Establish a system of controls and transparency over the mineral supply chain, including a chain of custody or traceability system or the identification of upstream actors in the supply chain. Create and maintain internal documentation and records of supply chain due diligence processes, findings and resulting decisions.	All	Fully Aligned	<p>POLICIES AND STANDARDS: Craft 2.1 Volume 3.3.1 states: "The CRAFT Code in Vol.1, chapter 2.2 differentiates between the main organizational scope of an AMP and an extended organizational scope, defined as "In the case of supply-chain based groups, the extended organizational scope may additionally include Processors and/or Aggregators as Members of an AMP". If upstream supply chain actors, such as intermediate traders, processors, aggregators, etc. participate in an AMP, Volume 2 (i.e. 2A and 2B) applies to them. If the same upstream supply chain actors do not participate in an AMP, they are considered Scheme Members of a CRAFT UA-Scheme. Being the same type of upstream supply chain actors, it is reasonable to demand that they conform to the same requirements.' Section 3.3.3 a) states: "Support, monitor and verify that Scheme Members have a system of controls and transparency over the mineral supply chain originating from AMPs affiliated to the UA-Scheme in place, including a chain of custody or traceability system."</p>
B.10	For all upstream companies: Support the implementation of the principles and criteria of the Extractive Industry Transparency Initiative (EITI).	Up	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1 Volume 2A sets the requirement in M.4/2.2.1/R.2 "The AMP discloses, or declares to be committed to disclose, payments of taxes, fees, and royalties to the national EITI." Volume 3 Section 3.3.1 b) states: "Support, monitor and verify that the scope of risk identification and assessment extends to all of the risks set out in Annex II and the relevant supplement of the OECD Minerals Guidance, by verifying that no requirement in Modules 2 to 4 of Volume 2 of the CRAFT Code meets a fail criterion. This includes – inter alia – the Scheme Member’s obligation to support the implementation of the principles and criteria of the Extractive Industry Transparency Initiative (EITI), as specified in requirement M.4/2.2.1/R.2 of Volume 2A. "</p>



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.11	For local mineral exporters: Collect and disclose information on taxes/payments and details of mineral origin and transportation as set out in the 3T Supplement (taking account of business confidentiality and competitive concerns).	Up	Fully Aligned	<p>POLICIES AND STANDARDS:</p> <p>Craft 2.1 Volume 3 3.3.d) states: "Support, monitor and verify that all financial transactions are supported by verifiable information in the Scheme Members' accounting system. This applies particularly in case of cash transactions. Support Scheme Members to avoid cash transactions at all, wherever this is feasible and practicable.</p> <p>For the purpose of verification by the UA-Scheme, smelter/refiner audits or OECD alignment assessments of the UA-Scheme, Scheme Members must be able to disclose (under terms of strict business confidentiality and respecting competitive concerns) at least:</p> <ul style="list-style-type: none"> • Invoices or receipts related to all inputs and outputs of mineral products originating from the AMPs affiliated to the UA-Scheme • Payments of taxes and fees and details of mineral origin and transportation as set out in the 3T Supplement • Other payments made to public or private security forces or other armed groups"



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.12	<p>For international concentrate traders, mineral reprocessors and smelters/refiners: Incorporate disclosure requirements into commercial contracts and contractually require local exporters to provide the taxes/payments and origin information set out in the Supplements (information can be disclosed to and held by an Institutionalised Mechanism with a mandate to collect and process information on minerals from conflict-affected and high-risk areas).</p>	Up	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1 Volume 3 Section 3.3.3 d) states: "Support, monitor and verify that all financial transactions are supported by verifiable information in the Scheme Members' accounting system. This applies particularly in case of cash transactions. Support Scheme Members to avoid cash transactions at all, wherever this is feasible and practicable. For the purpose of verification by the UA-Scheme, smelter/refiner audits or OECD alignment assessments of the UA-Scheme, Scheme Members must be able to disclose (under terms of strict business confidentiality and respecting competitive concerns) at least:</p> <ul style="list-style-type: none"> • Invoices or receipts related to all inputs and outputs of mineral products originating from the AMPs affiliated to the UA-Scheme • Payments of taxes and fees and details of mineral origin and transportation as set out in the 3T Supplement • Other payments made to public or private security forces or other armed groups"



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.13	<p>For international concentrate traders and mineral reprocessors: Collect and disclose to downstream purchasers and relevant Institutionalised Mechanisms all export, import and re-export documentation including records of all taxes and any other payments made to public or private security forces or other armed groups, the identification of local exporters and the information provided by local exporters (information can be disclosed to and held by an Institutionalised Mechanism with a mandate to collect and process information on minerals from conflict-affected and high risk areas).</p>	Up	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1 Volume 3 Section 3.3.3 d) states: "Support, monitor and verify that all financial transactions are supported by verifiable information in the Scheme Members' accounting system. This applies particularly in case of cash transactions. Support Scheme Members to avoid cash transactions at all, wherever this is feasible and practicable. For the purpose of verification by the UA-Scheme, smelter/refiner audits or OECD alignment assessments of the UA-Scheme, Scheme Members must be able to disclose (under terms of strict business confidentiality and respecting competitive concerns) at least:</p> <ul style="list-style-type: none"> • Invoices or receipts related to all inputs and outputs of mineral products originating from the AMPs affiliated to the UA-Scheme • Payments of taxes and fees and details of mineral origin and transportation as set out in the 3T Supplement • Other payments made to public or private security forces or other armed groups"



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.14	<p>For all upstream companies: For minerals from a red-flagged location generate, on a disaggregated basis, information on taxes/payments and details of mineral origin and transportation as set out in the 3T Supplement. Make this information available to downstream purchasers and relevant Institutionalised Mechanisms (information can be disclosed to and held by an Institutionalised Mechanism with a mandate to collect and process information on minerals from conflict-affected and high-risk areas).</p>	Up	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1 Volume 2A states in M.4/2.2.1/R.1: The AMP and its Members can prove that they pay taxes, fees, and royalties as required by law. Volume 2B M.4/2.2.1/S.2.1 states: "It is reasonable to believe that the AMP is able and committed to disclose disaggregated information on taxes/payments and details of mineral origin and transportation to BUYERS and relevant Institutionalised Mechanisms. " Volume 3 3.3.3 d) states: "d) Support, monitor and verify that all financial transactions are supported by verifiable information in the Scheme Members' accounting system. This applies particularly in case of cash transactions. Support Scheme Members to avoid cash transactions at all, wherever this is feasible and practicable. For the purpose of verification by the UA-Scheme, smelter/refiner audits or OECD alignment assessments of the UA-Scheme, Scheme Members must be able to disclose (under terms of strict business confidentiality and respecting competitive concerns) at least:</p> <ul style="list-style-type: none"> • Invoices or receipts related to all inputs and outputs of mineral products originating from the AMPs affiliated to the UA-Scheme • Payments of taxes and fees and details of mineral origin and transportation as set out in the 3T Supplement • Other payments made to public or private security forces or other armed groups"



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.15	For all downstream companies: Introduce a supply chain transparency system that allows the identification of smelters/refiners in the mineral supply chain and, for minerals from red-flagged locations, provides the identification of all countries of origin, transport and transit for the minerals in the supply chains of each smelter/refiner.	Down	NA	
B.16	For all upstream companies: Avoid cash transactions were practicable and ensure cash transactions are supported by verifiable information.	Up	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1 Volume 2A states in M.4/5.1.5/R.1 Progress Criteria (pass: "mitigation progress satisfactory") The AMP tries to avoid cash payments as far as possible and economically viable to keep formal records.</p> <p>Volume 3 Section 3.3.1 d) states: "d) Support, monitor and verify that all financial transactions are supported by verifiable information in the Scheme Members' accounting system. This applies particularly in case of cash transactions. Support Scheme Members to avoid cash transactions at all, wherever this is feasible and practicable. "</p>



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.17	Assign a unique reference number to each input and output and adopt tamper proof physical security measures as set out in the Gold Supplement.	Up	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1 Volume 2A M.1/5.2.3/R.1 states: "The description of the AMP contains a list of the respective production and processing characteristics, capacities of the entities and traceability measures implemented. Volume 2B M.4/5.2.12/S.1.1 states: "The chain of custody system (internal related to Members, external related to BUYERS) of the AMP assigns unique reference numbers to each input and output and adopts tamper proof physical security measures." Volume 3 Section 3.3.3 b) For gold, the gold supplement of the OECD Minerals Guidance provides specific requirements. footnote 19: In case of gold, the control system has to include tamper proof physical security measures, such as assigning a unique reference number to each input and output.</p>
B.18	For gold exporters, recyclers and traders: Seek to deal directly with legitimate ASM producers or their representatives where possible.	Up	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1 Volume 3 Section 3.1.1.a) states: "a) conduct due diligence risk assessments, to ensure that the Scheme Member is legal and that no condition exists that would require others downstream of the Scheme Members to disengage because of supply chain risks related to Annex II of the OECD Minerals Guidance. Due diligence shall also cover other KYC-related aspects such as ownership (including beneficial ownership), corporate structure of the Scheme Member and the possible added value provided by the Scheme Member."</p>



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.19	For gold exporters, recyclers, traders and refiners: Inspect all shipments for conformity to the information provided by the supplier on the type of gold, weight and quality. Report any inconsistency to management responsible for due diligence, with no further action taken until the inconsistency is resolved, and physically segregate and secure any shipments with unresolved inconsistencies.	Up	Fully Aligned	POLICIES AND STANDARDS: CRAFT 2.1 Volume 3 Section 3.3.3 b) states: "Every shipment has to be identifiable, so that the receiving Scheme Member can inspect it for conformity to the information provided by the supplier on type of material, weight and quality. Inconsistencies have to be reported to the management responsible for due diligence. Until the inconsistency is resolved, the shipment has to be physically segregated and secured. Inconsistencies "



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.20	Maintain inventory and transaction documentation that can be retrieved and should include the physical descriptions set out in the Gold Supplement, supplier details including KYC information and unique references for processing, purchases and sales.	All	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1 Volume 2B M.4/5.2.12/S.1.1 states: "The chain of custody system (internal related to Members, external related to BUYERS) of the AMP assigns unique reference numbers to each input and output and adopts tamper proof physical security measures. All internal and external transactions are recorded in an inventory and transaction documentation, where records are kept at least 5 years for each reference number, describing type of material, weight, gold content, origin, transaction parties and date of transaction." Volume 3 Section 3.3.1 states: "If upstream supply chain actors, such as intermediate traders, processors, aggregators, etc. participate in an AMP, Volume 2 (i.e. 2A and 2B) applies to them. If the same upstream supply chain actors do not participate in an AMP, they are considered Scheme Members of a CRAFT UA-Scheme. Being the same type of upstream supply chain actors, it is reasonable to demand that they conform to the same requirements. " These are incorporated by reference .</p>
B.21	Cooperate fully and transparently with law enforcement agencies regarding gold transactions. Provide customs officials with access to complete information on all international shipments.	All	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT Volume 2A M.4/2.2.1/R.1 states: "The AMP cooperates fully and transparently with state agencies in charge of supervising mineral trade and provides customs with access to complete information regarding all shipments that cross international borders" Volume 3 Section 3.3.1 states: "If upstream supply chain actors, such as intermediate traders, processors, aggregators, etc. participate in an AMP, Volume 2 (i.e. 2A and 2B) applies to them. If the same upstream supply chain actors do not participate in an AMP, they are considered Scheme Members of a CRAFT UA-Scheme. Being the same type of upstream supply chain actors, it is reasonable to demand that they conform to the same requirements." These are incorporated by reference.</p>



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.22	Maintain due diligence information for a minimum of five years, preferably on a computerised database. For 3T supply chains, smelters/refiners and downstream purchasers should also make due diligence information available to downstream purchasers and relevant Institutionalised Mechanisms.	All	Fully Aligned	<p>POLICIES AND STANDARDS:</p> <p>CRAFT 2.1 Volume 2A M.1/5.2.3/R.2 states: "The public CRAFT Report, accessible to BUYERS and the public, contains this declaration and commitment.</p> <p>To implement CRAFT as adopted management system, the AMP repeats at least annually the ongoing, proactive and reactive steps of risk assessment (Step 2), risk mitigation (Step 3), verification (Step 4) and reporting (Step 5) as described in chapter 4 of Volume 1.</p> <p>All supporting evidence for the claims in the CRAFT Report (step 5) shall be kept for a period of five (5) years."</p> <p>Volume 3 Section 3.3.1 states: "If upstream supply chain actors, such as intermediate traders, processors, aggregators, etc. participate in an AMP, Volume 2 (i.e. 2A and 2B) applies to them. If the same upstream supply chain actors do not participate in an AMP, they are considered Scheme Members of a CRAFT UA-Scheme. Being the same type of upstream supply chain actors, it is reasonable to demand that they conform to the same requirements." These are incorporated by reference .</p> <p>Section 3.1.3 g states: "CRAFT UA-Schemes must maintain all due diligence related information for a minimum of five years, preferably on a computerised database."</p>
B.23	Aim to establish long-term relationships with suppliers in order to build responsible sourcing relationships with them.	All	Fully Aligned	<p>POLICIES AND STANDARDS:</p> <p>CRAFT 2.1 Module 3 Section 3.3.2 a) states: "a) Support Scheme Members to establish long-term relationships with their suppliers (AMPs and/or other Scheme Members upstream their position in the supply chain) in order to build responsible sourcing relationships with them."</p>



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.24	Communicate to suppliers the company's expectation that suppliers will undertake mineral supply chain due diligence and risk management consistent with the standards defined in Annex II of the Guidance.	All	Fully Aligned	POLICIES AND STANDARDS: RAFT 2.1 Module 3 Section 2.1 states: "CRAFT Schemes are expected to support AMPs with whom they engage, by guiding them in their process towards CRAFT conformance."
B.25	Incorporate the company's supply chain policy into contracts or written agreements with suppliers which can be applied and monitored.	All	Fully Aligned	POLICIES AND STANDARDS: CRAFT 2.1 Volume 3 Section 3.1.1 b) states: "Relations of the CRAFT UA-Scheme with Scheme Members shall be governed by a written contract which covers at least the following aspects."
B.26	Seek to support and build capacities of suppliers to improve risk management performance and comply with the company's supply chain policy.	All	Fully Aligned	POLICIES AND STANDARDS: CRAFT 2.1 Volume 3 Section 3.1.4 states: "CRAFT UA-Schemes shall provide capacity building and training <ul style="list-style-type: none"> • to Members of AMPs and Scheme Members, including their owners, managers and employees; • on understanding the OECD Minerals Guidance and its practical application and building due diligence capacity; • on understanding the CRAFT Code as a management system and supply chain policy; • to improve risk management performance and be able to comply with the requirements of the CRAFT Code's supply chain policy based on the OECD Minerals Guidance."



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.27	Commit to designing measurable improvement plans with suppliers, involving external stakeholders such as government or civil society as appropriate.	All	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1 Volume 3 Section 3.2 e) states: "e) Support AMPs – where possible as joint work in cooperation/collaboration with Scheme Members – in the process of designing measurable risk mitigation and improvement plans. Involve external stakeholders such as official and traditional authorities/government or civil society as appropriate."</p>
B.28	Establish a grievance mechanism that enables any affected stakeholders or whistle-blowers to voice concerns regarding the circumstances of extraction, trade, handling and export of minerals. The grievance mechanism may be provided directly, through collaboration with other companies, or through an industry programme or Institutionalised mechanism.	All	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1 Volume 2A sets the requirement in M.5/5.2.8/R.1: "The AMP has established clear procedures to address complaints and grievances." Vol 2A - A confidential grievance mechanism is in place and communicated to Members, the community and other possibly affected stakeholders, that allows any Member or external stakeholder to openly or anonymously voice complaints and grievances. No requirements for Scheme members. Volume 3 Section 3.1.5 states "CRAFT UA-Schemes must have a grievance mechanism in place. This mechanism shall enable any affected stakeholder or whistle-blower to voice concerns regarding the circumstances of extraction, trade, handling and export of minerals."</p>



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.29	Bullion banks should maintain inventories in such a way that gold from refineries with due diligence practices verified to be consistent with the Guidance can be identified and provided to downstream companies.	Down	NA	
B.30	Downstream companies should request suppliers to identify the gold refiners in the supply chain and provide verification that the refiner(s) has conducted due diligence in accordance with the Guidance.	Down	NA	
Step 2: identify and assess risks in the supply chain				
Requirements set by Programme for companies subject to audit under the program				



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.31	Identify risks in supply chains taking into consideration that the scope for the risk assessment will depend on the position in the supply chain (e.g., upstream, downstream).	All	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1 Addressed in Volume. 2A. Module 3 which is applicable to AMPs. Volume 3 Section 3.3.1 states: "If upstream supply chain actors, such as intermediate traders, processors, aggregators, etc. participate in an AMP, Volume 2 (i.e. 2A and 2B) applies to them. If the same upstream supply chain actors do not participate in an AMP, they are considered Scheme Members of a CRAFT UA-Scheme. Being the same type of upstream supply chain actors, it is reasonable to demand that they conform to the same requirements. " These are incorporated by reference . Section 3.3.1 introduction includes the following statement: "Taking into consideration that the scope for the risk assessment depends on the position in the supply chain, for Scheme Members, Volume 2 of the Code has to be read in analogy, with mainly "AMP and its Members" equivalent to "Scheme Member and its employees", and "mine site" equivalent to "Scheme Members' company premises".</p>
B.32	Ensure that the scope of risk identification and assessment extends to all of the risks set out in Annex II and the recommendations in the Due Diligence Guidance.	All	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1 Volume 2A. Module 3 which is applicable to AMPs. Volume 3 Section 3.3.1 states: "If upstream supply chain actors, such as intermediate traders, processors, aggregators, etc. participate in an AMP, Volume 2 (i.e. 2A and 2B) applies to them. If the same upstream supply chain actors do not participate in an AMP, they are considered Scheme Members of a CRAFT UA-Scheme. Being the same type of upstream supply chain actors, it is reasonable to demand that they conform to the same requirements. " These are incorporated by reference . Section 3.2 c) states: "c) Support, monitor and verify that the scope of risk identification and assessment extends to all of the risks set out in Annex II and the relevant supplement of the OECD Minerals Guidance, by verifying that no requirement in Modules 1 to 4 of the volumes 2A and 2B of the CRAFT Code meets a fail criterion Section 3.3.1 b) Also includes reference to OECD DDG Annex II risk.</p>



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.33	Identify and assess whether the locations of mineral origin and transit, the nature of suppliers or the circumstances within the supply chain may trigger 'red flags' as defined by their policy and the relevant Supplement of the Guidance.	All	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1 Volume 2A M.1/5.2.3/R.1 states: The AMP also indicates if - in its opinion - the operations are located in a Conflict-Affected and High-Risk Area (CAHRA) or not. Volume 3 Section 3.1.2 d) states: "d) Having mapped and determined CAHRA and Red Flag considerations, UA-Schemes shall, for every AMP and Scheme Member in their supply chain, identify and assess whether their locations of mineral origin and transit, the nature of suppliers or the circumstances within the supply chain may trigger 'red flags' as defined above. "</p>
B.34	For local exporters, recyclers, traders and refiners: Using reasonable and good faith efforts and steps proportional to risk, determine whether gold is mined gold, recyclable gold or grandfathered stocks as set out in the gold supplement.	Up	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1. Addressed in footnote 19 of Section 3.3.3b which states: "In case of gold, the control system has to include tamper proof physical security measures, such as assigning a unique reference number to each input and output. Additionally, receiving parties must use reasonable and good faith efforts and steps proportional to risk, to determine whether the gold is really mined gold, and not recycled or grandfathered material."</p>



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.35	For gold producers: Determine whether upstream gold producers also purchase gold (including ASM gold) and, through the steps described in the Supplement, determine whether this may trigger 'red flags'.	Up	Fully Aligned	<p>POLICIES AND STANDARDS:</p> <p>CRAFT 2.1 Volume 2A M.1/5.2.3/R.1states: The AMP also indicates if - in its opinion - the operations are located in a Conflict-Affected and High-Risk Area (CAHRA) or not.</p> <p>Volume 3 3.1.2d) states: "Having mapped and determined CAHRA and Red Flag considerations, UA-Schemes shall, for every AMP and Scheme Member in their supply chain, identify and assess whether their locations of mineral origin and transit, the nature of suppliers or the circumstances within the supply chain may trigger 'red flags' as defined above. The assessment shall also determine whether AMPs also purchase material from other ASM locations and whether this may trigger Red Flags. "</p>
B.36	For all upstream companies: Map the factual circumstances of the supply chain, including the origin of minerals and the activities/relationships of suppliers.	Up	Fully Aligned	<p>POLICIES AND STANDARDS:</p> <p>Covered in Vol 2A. Appropriate for AMPs.</p> <p>CRAFT 2.1 Volume 2A. Module 3 which is applicable to AMPs.</p> <p>Volume 3 Section 3.3.1 states: "If upstream supply chain actors, such as intermediate traders, processors, aggregators, etc. participate in an AMP, Volume 2 (i.e. 2A and 2B) applies to them. If the same upstream supply chain actors do not participate in an AMP, they are considered Scheme Members of a CRAFT UA-Scheme. Being the same type of upstream supply chain actors, it is reasonable to demand that they conform to the same requirements." These are incorporated by reference.</p> <p>Section 3.1.2 states: "It is one of the core responsibilities of a CRAFT UA-Scheme to map the factual circumstances of the Scheme's supply chain, including the origin of minerals and the activities/relationships of suppliers (AMPs and Scheme Members). "</p>



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.37	For gold mined by or purchased from medium and large-scale mining operations determine risk through evidence gathered with reference to the criteria set out in the Supplement.	Up	NA	NA
B.38	For ASM gold mined by ASM mining enterprises in red-flagged operations or purchased by medium and large-scale mining companies, determine risk through evidence gathered with reference to the criteria set out in the Supplement.	Up	Fully Aligned	<p>POLICIES AND STANDARDS:</p> <p>CRAFT 2.1 Covered in Volume 2A. AMPs are expected to provide verifiable claims on all Annex II risks. Volume 3 Section 3.1.3b) states: "For minerals mined by AMPs in red-flagged operations or purchased from such AMPs by Scheme Members, risks have to be determined through evidence gathered by desktop research, interviews with stakeholders and site visits, with reference to the criteria set out in the corresponding Supplement of the OECD Minerals Guidance. "</p>



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.39	For all upstream companies: Undertake an in-depth review of the context of all red-flagged locations and the due diligence practices of any red-flagged suppliers, covering all of the aspects referenced in the Supplements.	Up	Fully Aligned	<p>POLICIES AND STANDARDS:</p> <p>CRAFT 2.1 Covered in Volume 2A. AMPs are expected to provide verifiable claims on all Annex II risks. Volume 3 Section 3.1.3b) states: "For minerals mined by AMPs in red-flagged operations or purchased from such AMPs by Scheme Members, risks have to be determined through evidence gathered by desktop research, interviews with stakeholders and site visits, with reference to the criteria set out in the corresponding Supplement of the OECD Minerals Guidance. "c) Due diligence activities on red-flagged supply chains shall involve an in-depth review of the context of all red-flagged locations and the due diligence practices of any red-flagged suppliers, covering all of the aspects referenced in the corresponding Supplement of the OECD Minerals Guidance. "</p>
B.40	For all upstream companies: Undertake on-the-ground assessments, performed by suitably qualified and independent assessors, of red-flagged sources of mined minerals. Provide this information to downstream companies in the supply chain.	Up	Fully Aligned	<p>POLICIES AND STANDARDS:</p> <p>CRAFT 2.1 covered in Vol 2A. Appropriate for AMPs and covered in CRAFT Report. Volume 3.1.3 d) states: "Due diligence activities on red-flagged supply chains shall always involve on-the-ground assessments. For that purpose the UA-Scheme shall establish on-the-ground assessment teams of suitably qualified and independent assessors with appropriate capabilities and access rights. As Scheme Members retain individual responsibility for their due diligence, they shall always be invited and encouraged to actively participate in the on-the-ground assessment teams. It is their responsibility to ensure that circumstances specific to their operations (of which the Scheme may not be aware) are duly taken into consideration." f) states "f) Information about the results of assessments shall be provided to companies downstream in the supply chain with a legitimate interest in the findings, which includes Scheme Members as well as – for the purpose of providing assurance – downstream companies sourcing from the UA-Scheme’s supply chain. "</p>



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.41	For mined gold, obtain evidence of the factual circumstances of gold extraction, trade, handling and export, having regard to the differences between LSM and ASM gold and the relevant criteria for each provided in the Supplement.	Up	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1 Covered in Vol 2A. Appropriate for AMPs and covered in CRAFT Report. Volume 3 Section 3.3.1 states: "If upstream supply chain actors, such as intermediate traders, processors, aggregators, etc. participate in an AMP, Volume 2 (i.e. 2A and 2B) applies to them. If the same upstream supply chain actors do not participate in an AMP, they are considered Scheme Members of a CRAFT UA-Scheme. Being the same type of upstream supply chain actors, it is reasonable to demand that they conform to the same requirements." These are incorporated by reference ."</p>
B.42	For recyclable gold, collect additional information from red flagged supply chains, prioritizing higher risk persons, places and transactions with regard to the risk factors and testing activities described in the Supplement.	Up	NA	CRAFT is a Code/Standard for AMPs. Recycled materials not in scope.
B.43	For downstream companies: Use best efforts to identify the smelters/refiners in their supply chains.	Down	NA	



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.44	For downstream companies: Obtain from smelters/refiners in their supply chains details of countries of mineral origin, transit and transportation routes from the mine to the smelter/refiner.	Down	NA	
B.45	For downstream companies: Determine whether refiners have, or reasonably should have, identified red flags in their supply chain.	Down	NA	
B.46	For downstream companies: Obtain evidence on the due diligence practices of the smelter/refiner, including information generated from on the ground assessments, and review this against the due diligence processes of the Guidance	Down	NA	



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.47	For downstream companies: Where necessary, undertake spot checks at the smelter/refiner's facilities.	Down	NA	
B.48	Assess risks against the requirements of the company's supply chain policy (consistent with Annex II), the relevant Supplement of the Guidance, national laws and other relevant legal instruments. Any reasonable inconsistency between these requirements and the information obtained through due diligence should constitute a risk.	All	Fully Aligned	<p>POLICIES AND STANDARDS:</p> <p>CRAFT 2.1 Volume 2A section M.1/5.2.3/R.2 states: "The AMP implements its supply chain policy of assessing risks against the requirements of the OECD Minerals Guidance, by working towards full conformity with all CRAFT requirements, as well as against national laws and other relevant legal instruments, and documenting achievements of the past reporting period and goals of the next reporting period in its CRAFT Report. "</p> <p>Volume Section 3.2d) states: "d) Support, monitor and verify that – additional to conforming with the Modules 1 to 4 of the volumes 2A and 2B of the CRAFT Code as specified above – risks are also assessed against national laws and other relevant legal instruments. Any reasonable inconsistency between these requirements and the information obtained through due diligence should constitute a risk to be mitigated."</p> <p>Section 3.1.3c) states: "Due diligence activities on red-flagged supply chains shall involve an in-depth review of the context of all red-flagged locations and the due diligence practices of any red-flagged suppliers, covering all of the aspects referenced in the corresponding Supplement of the OECD Minerals Guidance. "</p>
Step 3: Design and implement a strategy to respond to identified risks				
Requirements set by Programme for companies subject to audit under the program				



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.49	Report findings of risk assessment to designated senior management, outlining the information gathered and the actual and potential risks identified in the supply chain risk assessment.	All	Fully Aligned	<p>POLICIES AND STANDARDS:</p> <p>CRAFT 2.1 Volume 1 Chapter 2.2 states: "The CRAFT is not prescriptive with regards to demanding any specific formally established organizational structure, but to be operational in practice, a de facto or formally constituted decision-making leadership structure needs to be in place. Membership to the AMP is functional and not administrative. "</p> <p>Volume 2A M.1/5.2.11/R.1 states: "The Responsible Person reports the results of risk assessment to the decision-making leadership structure of the AMP, outlining the information gathered and the actual and potential risks identified, and proposes a risk management plan for risk mitigation. "</p> <p>Volume 3 Section 3.1.3 e) states: "Findings of risk assessment always need to be reported to the designated senior management (i.e. the "Responsible Person" of the AMP or the Scheme Member, and senior management of the UA-Scheme), outlining the information gathered and the actual and potential risks identified in the supply chain risk assessment. "</p>
B.50	Enhance engagement with suppliers and strengthen internal controls, having regard to the specific measures for upstream and downstream companies provided in the Supplement.	All	Fully Aligned	<p>POLICIES AND STANDARDS:</p> <p>CRAFT 2.1 Volume 3 Section 3.1.1. states: "CRAFT UA-Schemes serve this purpose in the supply chain segment between AMPs and smelters/refiners. Vice versa this enhances the engagement of the supply chain actors with their suppliers up to the AMP and strengthens internal controls along the supply chain. For this purpose, a key characteristic and role of UA-Schemes is to engage as a facilitator not only with AMPs but similarly with Scheme Members."</p>



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.51	For downstream companies: Companies that have been unable to identify refiners in their supply chain(s) should devise a risk management plan that will enable them to demonstrate significant measurable improvement in doing so.	Down	NA	
B.52	Manage the identified risks by either: (i) continuing to trade but with measurable risk mitigation, (ii) temporarily suspending trade while mitigation is put in place, or (iii) ceasing trade with the relevant supplier. In doing so have regard to the specific recommendations of the relevant Supplements.	All	Fully Aligned	POLICIES AND STANDARDS: CRAFT 2.1 Volume 2A Modules 3 “ANNEX II RISKS” REQUIRING IMMEDIATE DISENGAGEMENT and 4. “ANNEX II RISKS” REQUIRING DISENGAGEMENT AFTER UNSUCCESSFUL MITIGATION. Covered in these sections.



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.53	For downstream companies: Companies should take immediate steps to disengage with a refiner if the refiner has not immediately suspended or discontinued engagement with its suppliers where reasonable risks of serious abuses or direct or indirect support to non-state armed groups exist.	Down	NA	



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.54	Measurable risk mitigation should result in significant and measurable improvement towards eliminating the identified risks, other than serious abuses, within six months from the adoption of the risk management plan. If there no such measurable improvement within six months, companies should suspend or discontinue engagement with the supplier for a minimum of three months.	All	Fully Aligned	POLICIES AND STANDARDS: CRAFT 2.1Volume 2A Modules 3 “ANNEX II RISKS” REQUIRING IMMEDIATE DISENGAGEMENT and 4.“ANNEX II RISKS” REQUIRING DISENGAGEMENT AFTER UNSUCCESSFUL MITIGATION. Covered in these sections.
B.55	Build and/or exercise leverage over the actors in the supply chain who can most effectively and most directly prevent and mitigate the risks of adverse impacts.	All	Fully Aligned	POLICIES AND STANDARDS: CRAFT 2.1 Volume 3 Section 3.2.l) states: “Involve Scheme Members in the processes of risk assessments and implementation of risk management plans, reminding them of their ultimate individual responsibility of undertaking due diligence. Build and/or exercise leverage over the Scheme Members who can most effectively and most directly prevent and mitigate the risks of adverse impacts.”



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.56	Consult with suppliers and affected stakeholders to agree on the strategy for measurable risk mitigation in the risk management plan.	All	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1 Volume 3 Section 3.2 f) states: "Support, monitor and verify that risk mitigation plans are consulted with the Members of the AMP and where applicable with affected stakeholders, and agreed upon as strategies for measurable risk mitigation. "</p> <p>3.3.1 d) states: "d) Support, monitor and verify the process of designing and implementing measurable risk mitigation and improvement plans, ensuring that</p> <ul style="list-style-type: none"> • these plans involve external stakeholders such as government or civil society as appropriate and are consulted with suppliers, such as AMPs and Scheme Members further upstream, and agreed upon as strategies for measurable risk mitigation"
B.57	For upstream companies: Publish the supply chain risk assessment and the supply chain management plan, with due regard to business confidentiality and other competitive concerns and make them available to external stakeholders as set out in the relevant Supplement.	Up	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1 Volume 2A - Covered by the CRAFT Report. Volume 3 Section 3.2 n) states: "n) Support the AMP in publishing the Public CRAFT Report (with due regard to business confidentiality and other competitive or security related concerns), for example at the UA-Scheme's website. Ensure that the full CRAFT Report is accessible to Scheme Members sourcing from the AMP (BUYERS) and for all purposes which require verifying the verifiable claims (such as smelter or refiner audits as per the OECD Minerals Guidance or for the purpose of an OECD alignment assessment of the CRAFT UA-Scheme)."</p> <p>Section 3.3.1 f) & g) states: "f) Support Scheme Members in the process of preparing their CRAFT Reports and publishing the Public CRAFT Report (with due regard to business confidentiality and other competitive or security related concerns), for example at the UA-Scheme's website. g) Ensure that the full CRAFT Report is accessible to Scheme Members further downstream the supply chain and for all purposes which require verifying the verifiable claims (such as smelter or refiner audits as per the OECD Minerals Guidance or for the purpose of an OECD alignment assessment of the CRAFT UA-Scheme)."</p>



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.58	For upstream companies: Gold producers with red flagged operations and other upstream companies sourcing ASM gold should assist and enable legitimate ASM producers to build supply chains consistent with the Guidance.	Up	Fully Aligned	<p>POLICIES AND STANDARDS:</p> <p>CRAFT 2.1 Covered in Vol 3 for Schemes to support AMPs in numerous locations including Section 2.1. "AMPs usually engage with CRAFT Schemes with the expectation to obtain support for improving mining practices and for engaging with formal markets. CRAFT Schemes are expected to support AMPs with whom they engage, by guiding them in their process towards CRAFT conformance."</p>



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

B.59	Implement the risk management plan, monitor risk mitigation and report performance to designated senior management and consider suspending or discontinuing trade with a supplier after failed attempts at mitigation.	All	Fully Aligned	<p>POLICIES AND STANDARDS:</p> <p>CRAFT 2.1 Volume 2A M.1/5.2.11/R.1 states: "The Responsible Person is a senior staff or representative of the decision-making leadership structure with the necessary knowledge/experience and competence/authority to oversee all aspects of CRAFT implementation, and is entitled to make claims on behalf of the AMP (i.e. issue the CRAFT Report).</p> <p>The Responsible Person reports the results of risk assessment to the decision-making leadership structure of the AMP, outlining the information gathered and the actual and potential risks identified, and proposes a risk management plan for risk mitigation. "</p> <p>Volume 3 3.2 g) - j) states: g) Support, monitor and verify that risk management plans are implemented as agreed, and that effectiveness of risk mitigation efforts is evaluated.</p> <p>h) Monitor and verify the implementation of risk management plans and maintain ongoing risk monitoring. Undertake additional fact and risk assessments as required. Where feasible this monitoring shall be done in cooperation or consultation with local and central authorities and other relevant stakeholders and may include supporting community-based networks.</p> <p>i) Monitor and verify that all results of risk assessments and performance monitoring of the implementation of risk management plans are reported to the responsible person of the AMP and the senior management of the Scheme.</p> <p>j) If risks related to the requirements of Vol.2/Mod.3 were identified or if mitigation attempts of risks related to the requirements of Vol.2/Mod.4 have failed, the senior management of the Scheme shall advise Scheme Members that are BUYERS to suspend or discontinue trade with an AMP.</p> <p>Section 3.3.1 d) & e) states: "d) Support, monitor and verify the process of designing and implementing measurable risk mitigation and improvement plans, ensuring that</p> <ul style="list-style-type: none"> • these plans involve external stakeholders such as government or civil society as appropriate and are consulted with suppliers, such as AMPs and Scheme Members further upstream, and agreed upon as strategies for measurable risk mitigation, • effectiveness of risk mitigation efforts is monitored and evaluated on an ongoing basis and additional fact and risk assessments are carried out as required, • all results of risk assessments and performance monitoring are reported to the responsible person of the Scheme Member and the senior management of the UA-Scheme. <p>e) If risks related to the requirements of Module 3 of Vol.2 are identified or if mitigation attempts of risks related to the requirements of Module 4 of Vol.2 have failed, the senior management of the UA-Scheme shall advise Scheme Members further downstream of the compromised Scheme Member to suspend or discontinue trade."</p>
------	--	-----	---------------	--



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

B.60	<p>For upstream companies: Implement, monitor and track performance of risk mitigation in cooperation/consultation with local and central authorities and other relevant stakeholders. Consider establishing or supporting community-based networks to monitor risk mitigation.</p>	Up	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1 Volume 2A M.1/5.2.11/R.1 states: "Monitoring and performance tracking of risk mitigation should be carried out in cooperation and/or consultation with local and central authorities, international or civil society organizations and affected third parties as appropriate. AMP may wish to establish or support the creation of community monitoring networks to monitor or track performance of risk mitigation." Volume 3 3.2 g) - j) states: g) Support, monitor and verify that risk management plans are implemented as agreed, and that effectiveness of risk mitigation efforts is evaluated. h) Monitor and verify the implementation of risk management plans and maintain ongoing risk monitoring. Undertake additional fact and risk assessments as required. Where feasible this monitoring shall be done in cooperation or consultation with local and central authorities and other relevant stakeholders and may include supporting community-based networks. i) Monitor and verify that all results of risk assessments and performance monitoring of the implementation of risk management plans are reported to the responsible person of the AMP and the senior management of the Scheme. j) If risks related to the requirements of Vol.2/Mod.3 were identified or if mitigation attempts of risks related to the requirements of Vol.2/Mod.4 have failed, the senior management of the Scheme shall advise Scheme Members that are BUYERS to suspend or discontinue trade with an AMP. Section 3.3.1 d) & e) states: "d) Support, monitor and verify the process of designing and implementing measurable risk mitigation and improvement plans, ensuring that • these plans involve external stakeholders such as government or civil society as appropriate and are consulted with suppliers, such as AMPs and Scheme Members further upstream, and agreed upon as strategies for measurable risk mitigation, • effectiveness of risk mitigation efforts is monitored and evaluated on an ongoing basis and additional fact and risk assessments are carried out as required, • all results of risk assessments and performance monitoring are reported to the responsible person of the Scheme Member and the senior management of the UA-Scheme. e) If risks related to the requirements of Module 3 of Vol.2 are identified or if mitigation attempts of risks related to the requirements of Module 4 of Vol.2 have failed, the senior management of the UA-Scheme shall advise Scheme Members further downstream of the compromised Scheme Member to suspend or discontinue trade."</p>
------	---	----	---------------	--



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.61	Maintain ongoing risk monitoring, evaluate the effectiveness of risk mitigation efforts and undertake additional fact and risk assessments as required, for example following changes to the supply chain.	All	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1 Covered in Vol 1, & 2A for AMPs. Requires annual CRAFT reports. Volume 3 Volume 3.2 g) & h) states: "g) Support, monitor and verify that risk management plans are implemented as agreed, and that effectiveness of risk mitigation efforts is evaluated. h) Monitor and verify the implementation of risk management plans and maintain ongoing risk monitoring. Undertake additional fact and risk assessments as required. Where feasible this monitoring shall be done in cooperation or consultation with local and central authorities and other relevant stakeholders and may include supporting community-based networks. Section 3.3.1 d) states: "d) Support, monitor and verify the process of designing and implementing measurable risk mitigation and improvement plans, ensuring that</p> <ul style="list-style-type: none"> • these plans involve external stakeholders such as government or civil society as appropriate and are consulted with suppliers, such as AMPs and Scheme Members further upstream, and agreed upon as strategies for measurable risk mitigation, • effectiveness of risk mitigation efforts is monitored and evaluated on an ongoing basis and additional fact and risk assessments are carried out as required, • all results of risk assessments and performance monitoring are reported to the responsible person of the Scheme Member and the senior management of the UA-Scheme. "
Step 4: Carry out independent third-party audit of supply chain due diligence at identified pints in the supply chain.				
Requirements set by Programme for companies subject to audit under the program				



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.62	Carry out independent third-party audit of supply chain due diligence at identified points in the supply chain.	Up	NA	
B.63	Facilitate auditor access to company sites, documentation, records and, as appropriate, access to suppliers and other relevant stakeholders, such as on-the-ground assessment teams.	Up	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1 Covered in Vol 2A The requirements are for the AMPs to produce a CRAFT report that contains verifiable information. Volume 3 Section 3.1.1. v) states: "For the purpose of carrying out due diligence services and providing assurance, the Scheme Member grants the UA-Scheme access to company sites, documentation, records and, as appropriate, access to suppliers and other relevant stakeholders, such as on-the-ground assessment teams. " Section 3.1.6 c) states: "In case of smelter or refiner audits as per the OECD Minerals Guidance or for the purpose of an OECD alignment assessment of the CRAFT UA-Scheme, the Scheme shall provide auditors or assessors access to all its offices and on-the-ground assessment teams, documentation, records and, as appropriate, facilitate access to AMP's and Scheme Members' sites and documentation."</p>
Requirements that programs set for auditors				
B.64	Audit scope covers all of the smelter/refiner's business activities and management processes related to mineral supply chain due diligence.	All	NA	



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.65	The audit criteria assess the conformity of the smelter/refiner's due diligence practices against the requirements of a standard based on the Guidance.	All	NA	
B.66	Auditors are required to be independent of the smelter/refiner and its supply chain, both with respect to business or financial relationships and with any services provided to the auditee company or its supply chain relating to due diligence practices.	All	NA	
B.67	Auditors should be technically competent with appropriate mineral supply chain knowledge, as described in the Supplements.	All	NA	



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.68	Audit activities should include audit preparation, document review, in-site investigations, risk-based sampling of due diligence records and data, and audit conclusions, as described in the Guidance.	All	NA	
Step 5: Report on supply chain due diligence				
Requirements set by Programme for companies subject to audit under the program				
B.69	Annually report, or integrate into annual sustainability or corporate responsibility reports, information on supply chain due diligence.	All	Fully Aligned	<p>POLICIES AND STANDARDS:</p> <p>CRAFT 2.1 Volume 1 states: "The findings of this first- and/or second-party verification exercise shall be documented in the CRAFT Report, matching the reporting requirement (step 5) of the OECD DDG five-step framework. AMPs shall periodically (at least annually) issue CRAFT Reports, documenting the fulfilment of the CRAFT Requirements (see CRAFT Volume 2) in the form of verifiable claims.</p> <p>Volume 3 Section 3.1.6 b) states: "b) CRAFT UA-Schemes shall publish annual reports which describe the Scheme's management systems, supply chain due diligence activities, the methodology and results of the risk assessment and the steps taken to manage risks at the AMPs in their scope as well as along the Scheme Members' supply chain originating from the AMPs. "</p>



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.70	For all upstream companies (including smelters/refiners): The report should describe the company's management systems, the methodology and results of the risk assessment and the steps taken to manage risks, consistent with the specific content described in the Guidance. The report should be published.	Up	Fully Aligned	<p>POLICIES AND STANDARDS:</p> <p>CRAFT 2.1 Volume 1 Chapter 4.1 describes the CRAFT Reports requirements and conforms with the requirements.</p> <p>Volume 3 Section 3.1.6 b) states: "b) CRAFT UA-Schemes shall publish annual reports which describe the Scheme's management systems, supply chain due diligence activities, the methodology and results of the risk assessment and the steps taken to manage risks at the AMPs in their scope as well as along the Scheme Members' supply chain originating from the AMPs. "</p>
B.71	For smelters/refiners: The audit reports should be published	Up	NA	Volume 3 Section 3.1.6 b)



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.72	For gold refiners: In addition to reporting on management systems, risk assessment and risk management as defined in the Supplement, refiners should publish the summary audit reports including details of audit dates, activities, methodology and conclusions (either directly or through cooperation with an Industry Programme or Institutionalised Mechanism).	Up	NA	



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
B.73	For downstream companies: The report should describe the company's management systems, the methodology and results of the risk assessment and the steps taken to manage risks, consistent with the specific content described in the Supplement.	Down	NA	
C Specific responsibilities of Programmes				
Step 1: Establish strong company management systems				
C.1	Undertake due diligence on the ownership (including beneficial ownership) and corporate structure of refiners/smelters seeking accreditation/certification or membership status under the Programme.	All	NA	CRAFT does not cover SORs



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
C.2	Provide training to companies and/or their suppliers on due diligence management systems and processes.	All	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1 Volume 3 Section 3.1.4 states: "CRAFT UA-Schemes shall provide capacity building and training</p> <ul style="list-style-type: none"> • to Members of AMPs and Scheme Members, including their owners, managers and employees; • on understanding the OECD Minerals Guidance and its practical application and building due diligence capacity; • on understanding the CRAFT Code as a management system and supply chain policy; • to improve risk management performance and be able to comply with the requirements of the CRAFT Code's supply chain policy based on the OECD Minerals Guidance. <p>With a training of trainers approach, Scheme Members shall be enabled to train and assist their suppliers."</p>
C.3	Programmes that provide support for downstream companies should collect and process information from suppliers, including smelters/refiners, on due diligence in the supply chains of minerals from conflict-affected or high-risk areas.	Down	NA	



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
C.4	Provide or facilitate access to a grievance mechanism that allows any impacted stakeholder to voice concerns relating to the extraction and supply chain activities of the relevant mineral(s) covered by the Programme.	All	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1 Volume 3 Section 3.1.5 states:" CRAFT UA-Schemes must have a grievance mechanism in place. This mechanism shall enable any affected stakeholder or whistle-blower to voice concerns regarding the circumstances of extraction, trade, handling and export of minerals. "</p>
Step 2: identify and assess risks in the supply chain				
C.5	Support companies sourcing minerals from red flagged operations in establishing on-the-ground assessment teams with appropriate capabilities and access rights as set out in the Guidance.	All	Fully Aligned	<p>POLICIES AND STANDARDS: CRAFT 2.1 Volume 3.0 Section 3.1.3 d) states: "d) Due diligence activities on red-flagged supply chains shall always involve on-the-ground assessments. For that purpose the UA-Scheme shall establish on-the-ground assessment teams of suitably qualified and independent assessors with appropriate capabilities and access rights. As Scheme Members retain individual responsibility for their due diligence, they shall always be invited and encouraged to actively participate in the on-the-ground assessment teams. It is their responsibility to ensure that circumstances specific to their operations (of which the Scheme may not be aware) are duly taken into consideration. On-the-ground assessments shall cover all risks referenced in the corresponding Supplement of the OECD Minerals Guidance. These risks are reflected in the requirements of Volume 2 of the CRAFT Code. To ensure full alignment with the OECD Minerals Guidance, the UA-Scheme shall consult the corresponding Supplement."</p>
Step 3: Design and implement a strategy to respond to identified risks				



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
C.6	Demonstrate an understanding, gained through some form of impact analysis or qualitative or quantitative evaluation, of the social and economic impacts that the Programme's requirements may have on developing countries and the Programme's relevance to or linkages with other existing internationally recognized standards.	All	Fully Aligned	<p>POLICIES AND STANDARDS:</p> <p>CRAFT 2.1 Volume 3 Section 3.1.6 a) states: "Every CRAFT UA-Scheme shall have an evaluation and impact monitoring process in place, to qualitatively or quantitatively evaluate the social and economic impacts that the requirements may have on the miners and communities, and developing countries where it operates and how the Scheme contributes to existing internationally recognized standards. Results of this evaluation and conclusions for improvements shall be documented periodically (e.g. in Annual Reports)."</p>
Step 4: Carry out independent third-party audit of supply chain due diligence at identified pints in the supply chain.				
C.7	Draft Audit Standards in accordance with the recommendations of the Guidance.	All	NA	
C.8	Accredit the auditors who may perform audits under the Programme.	All	NA	



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

ITEM	Overarching Due Diligence Principles within Programme Standards and Guidance	Up or Down Stream	Rating for Policies and Standards Schemes (CRAFT 2.1)	Evaluator comments on policies, standards and implementation (CRAFT 2.1)
C.9	Oversee, periodically review and monitor the ability of auditors to carry out audits in conformity with the Programme's requirements, based on the objectives, scope and criteria of the audit and judged against audit programme records.	All	NA	
C.10	Publish summary audit reports of smelters/refiners that include: (a) Smelter/refiner details, date of the audit and the audit period, (b) Audit activities and methodology and (c) Audit conclusions.	All	NA	



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.

About Responsible Trade

Responsible Trade LLC (Responsible Trade) recognizes that sourcing from conflict regions is necessary to continue the supply of certain minerals, but also ensure sustainability for the hard-working individuals striving to make an honest living. In addition to compliance program development and audits, Responsible Trade helps create and implement effective due diligence systems that enable sourcing from conflict-affected and high-risk areas. Responsible Trade connects the supply chain actors and provides assurance that the materials in the actor's supply chain are responsibly sourced. Responsible Trade works to secure supply chains and verify responsibly sourced minerals from conflict-ridden regions.

Responsible Trade, LLC © 2024



RESPONSIBLE TRADE, LLC. Helping companies responsibly manage their supply chains.



Helping companies responsibly manage their supply chains.