

# ERICSSON CRITICAL MINERALS FAQ

Updated March 2025

We have sent (or will send) you a questionnaire asking about the products you supply to Ericsson, and we need you to timely complete and return the questionnaire. To obtain some of the information requested, you may need to contact your suppliers and sub suppliers.

Ericsson needs the help of its suppliers to:

- Fully comply with legal requirements on the responsible sourcing of minerals, including due diligence and traceability requirements
- Fully meet the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

This is why we are requesting suppliers to fill the Responsible Minerals Initiative (RMI) Minerals Reporting Templates.

If you manufacture on Ericsson's behalf products that contain any of listed minerals below, it is your obligation to fill the respective questionnaire:

- Tin, Tantalum, Tungsten, Gold (3TGs)
- Aluminium, Copper, Iron, Steel, Zinc, Nickel, Manganese, Cobalt, Lithium, Natural graphite, or Silica

We do not consider acceptable responses from suppliers that limit themselves to general positions about minerals, e.g. "we do not source from conflict countries". We need you to identify and share with us the smelter, refiners and mines in the supply chain.

## DEFINITIONS

### What are Conflict Minerals?

As defined by the Dodd Frank Act and the EU Conflict Minerals Directive "Conflict Minerals" currently include gold, as well as tin, tantalum and tungsten, the derivatives of cassiterite, columbite-tantalite, and wolframite, respectively. These conflict minerals are referred to as "3TG."

The Dodd-Frank Act authorizes the U.S. Secretary of State to designate additional minerals if it is determined that trade related to those minerals is being used to finance conflict in the Covered Countries.



**IMPORTANT:** As per the Dodd Frank Act and EU Conflict Minerals Directive the term “conflict minerals” applies to all 3TG minerals, whether or not they originated in the Covered Countries or CAHRAs. If you state to Ericsson that your products do not contain “conflict minerals”, we will interpret this as meaning that the product do not contain any of the 3TGs. If under investigation it is confirmed that your product contains any 3TGs you may be considered in breach of our Code of Conduct for Business Partners.

### **Are Conflict Minerals only 3TGs originating from the DRC?**

No. The definition of Conflict Minerals has evolved since the introduction of the Dodd Frank Act.

The U.S. Dodd-Frank Act covers 3TG sourced from the DRC and surrounding countries, which includes Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

According to the EU Conflict Minerals Directive, a mineral is defined as “conflict” if its extraction and processing (smelting/refining) takes place in a conflict affected or high-risk area (CAHRA). For an indicative list of such areas please check: [CAHRAs](#)

### **What are “Critical Minerals” for Ericsson?**

Critical minerals provide the building blocks for many modern technologies and are essential to our national security and economic prosperity. These minerals—such as rare earth elements, lithium, and cobalt—can be found in products from computers to household appliances.

Ericsson is transitioning from a “Conflict Minerals” to a wider “Critical Minerals” strategy to ensure a robust and sustainable supply chain for these important minerals.

For the purposes of this document, we include under the concept of “Critical Minerals”:

- The so called conflict minerals (3TGs)
- Other minerals that are critical for the energy transition and communication sectors (as referred above) whose extraction is associated to significant human rights or environmental impacts OR take place countries or areas defined as “High Risk” or “Conflict Affected”.

### **WHY IS ERICSSON EXTENDING THE LIST OF MINERALS UNDER DUE DILIGENCE?**

Ericsson’s current efforts on critical minerals to date have been focused on the 3TGs and Cobalt and Mica. With the implementation of new international and customs legislation such as the EU Battery Regulations or the EU Corporate Sustainability Due Diligence Directive (EU CSDDD) we need to extend our efforts to other critical minerals and metals such as Copper, Lithium, Copper, Aluminium, etc. as their extraction and processing methods have been associated to significant sustainability impacts. This is aligned with the latest developments of the RMI, of which Ericsson is a member. For more information see [Training \(responsiblemineralsinitiative.org\)](https://responsiblemineralsinitiative.org)

For more information, we invite you to visit: [Why is ESG so important to critical mineral supplies, and what can we do about it? – Analysis - IEA](#)



## ERICSSON EXPECTATIONS FROM SUPPLIERS

While we do not directly source minerals, we require our suppliers to avoid entities linked to forced labor, human rights abuses, environmental harm, or unethical practices.

Suppliers must have or establish effective due diligence processes, in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, when sourcing minerals. Please refer to these guidelines as your point of reference.

Ericsson suppliers of products that contain critical minerals are expected to:

- Implement a due diligence policy concerning the sourcing of critical minerals and other raw materials, addressing associated social, ethical, and environmental risks.
- Uphold strict due diligence measures in compliance with relevant laws and international best practices, including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- Ensure sub suppliers to the N Tier also meet the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. This can be achieved by requesting smelters, refiners to be certified against standards such as RMI Responsible Minerals Assurance Programme (RMAP) for Smelters or Refiners and encouraging mine operators be certified to a credible sustainability mining standard such as the International Mining Assurance Standard (IRMA)
- Establish an internal management system to support your due diligence policy by assigning responsibility at the top management level.
- Maintain records of this system for a minimum of 10 years.
- Incorporate your due diligence policy, including risk management measures, into contracts and agreements with suppliers.
- Establish a grievance mechanism, including an early-warning risk-awareness system and a remediation mechanism.
- Develop and operate a system of controls and transparency regarding the supply chain, including a chain of custody or traceability system, identifying upstream actors in the supply chain, along with a description of the raw material, including its trade name and type. See Section on Traceability below for more information.

## UNDERSTANDING LEGISLATIVE REQUIREMENTS

It is the supplier's responsibility to fully understand and comply with the constantly evolving regulatory landscape that affect the sourcing of minerals. The list below are some of the legislations we need to comply with and affect the sourcing of our minerals. As a supplier to Ericsson you must help us be able to comply with:



- The US Dodd Frank Act
- The EU Conflict Minerals Directive
- The EU Battery Regulations
- The EU Corporate Sustainability Due Diligence Directive (EU CSDDD)
- The EU Forced Labor Regulation
- The US Uyghur Forced Labor Prevention Act (UFLAP)
- The Mexico Forced Labor Law
- The Canada Supply Chain Transparency Law

Is there an exception for products that only contain trace amounts of minerals?

Legislation such as the US Dodd Frank Act or the UFLPA do not include “de minimis” exception. This means that even very small amounts of conflict minerals trigger disclosure obligations.

## USING THE RESPONSIBLE MINERALS ASSURANCE CERTIFICATION SYSTEM TO DEMONSTRATE MEETING DUE DILIGENCE REQUIREMENTS

### What is the connection between the RMI and the Dodd Frank Act?

Under the SEC rule, a “reasonable” country of origin inquiry can accept the representations of a supplier of 3TG if those representations are reliable and are believed to be true. A company would have reason to believe a processing facility’s (e.g., a SOR) representations if the facility received a “conflict-free” designation from a recognized industry group that requires an independent private sector audit.

3TG mining is part of the global supply chain, so reasonable inquiries as to origin and any necessary conflict-sensitive due diligence will continue to apply.

The Responsible Minerals Initiative's (RMI) Responsible Minerals Assurance Process (RMAP) meets the SEC description of a recognized industry group and can thus provide assurance to support a facility’s representations. It requires Chain of Custody (CoC) verification for mined material and identify the country of origin of the mined material.

The SEC final rule can be found at: <http://www.sec.gov/news/press/2012/2012-163.htm>

In June 2013, the SEC published an FAQ document, which can be found here <http://www.sec.gov/divisions/corpfina/guidance/conflictminerals-faq.htm>

See also: [Statement on the Effect of the Court of Appeals Decision on the Conflict Minerals Rule](#)

### What is the Responsible Minerals Initiative?

The Responsible Minerals Initiative (RMI) is a global organization that promotes responsible sourcing of minerals, particularly those linked to conflict, human rights abuses, and environmental harm. It provides tools, standards, and audit programs—such as the Responsible Minerals Assurance Process (RMAP)—to help companies ensure that minerals in their supply chains are ethically sourced.



For an Ericsson supplier, RMI compliance is crucial, as Ericsson has strict Environmental, Social, and Governance (ESG) commitments and adheres to international regulations like the Dodd Frank Act or the EU CSDDD.

We ask our suppliers to ensure their minerals come from RMAP-conformant smelters and certified mines.

### **What does it mean being RMI RMAP conformant?**

It means the smelter has successfully undergone an independent third-party assessment under the RMI Responsible Minerals Assurance Process (RMAP). This certification verifies that the smelter's sourcing practices for specific minerals comply with responsible sourcing standards.

### **Key Aspects of RMAP Conformance for Smelters include:**

1. **Third-Party Audit:**
  - The smelter is assessed against the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
  - The audit ensures that the smelter does not source minerals that contribute to human rights abuses, environmental harm, or conflict financing.
  
2. **Transparency & Traceability:**
  - The smelter must implement documented policies and procedures to ensure responsible mineral sourcing.
  - It must demonstrate a robust chain-of-custody system to track raw materials and prove their ethical origins.
  
3. **Conformance Status & Listing:**
  - If the smelter meets the RMAP requirements, it is added to the RMI's Conformant Smelter & Refiner List, which is widely used by companies for responsible sourcing compliance.
  - This listing provides assurance to downstream buyers that the smelter follows best practices in due diligence.
  
4. **Regular Reassessments:**
  - RMAP conformance is not permanent; smelters must undergo periodic re-audits (typically every year) to maintain their status.

### **Why does RMAP Conformance Matter?**

- **Regulatory Compliance:**  
Many companies need RMAP-compliant smelters to comply with regulations like the EU Conflict Minerals Regulation or the U.S. Dodd-Frank Act Section 1502.
- **Corporate Responsibility & ESG Goals:**  
Companies sourcing from RMAP-conformant smelters can ensure they support ethical supply chains.
- **Market Access:**  
Many large electronics, automotive, and industrial companies require suppliers to use RMAP-compliant smelters.



**If all my smelters have RMI RMAP Conformant Status, does it mean that I am in compliance with all sustainability regulations?**

No. RMI RMAP status is just one part of the due diligence requirements. In the case of the Dodd Frank Act companies that source from smelters or refiners that are in conformance with the revised RMI standard are not considered automatically in compliance with the SEC Final Rule. Under the SEC Final Rule, additional steps are required for companies to meet SEC reporting requirements: scoping, RCOI, and due diligence.

In the case of the EU Battery Regulations companies along the supply chain would have to have implemented a traceability system to determine the origin of the mineral.

**Is it illegal to procure conflict minerals from DRC region?**

No, it is not illegal. In fact, the rule is not intended to discourage the purchase conflict minerals from the DRC or adjoining countries. It is meant to provide transparency to stakeholders regarding whether the products they purchase are conflict free.

However, we would like to share here RMI's [latest press release](#) about the current situation in the DRC and we ask our suppliers with smelters in the region to excise enhanced due diligence when sourcing from the DRC and neighbouring countries.

Beyond tools and equipment as described in the rule, how does Section 1502 of the Dodd Frank Act apply to products a company purchases for internal purposes, i.e., office supplies or network and computer equipment?

Supplies and equipment acquired for use for internal purposes are not within scope. The rule also excludes from scope physical tools or machines used to manufacture products. This concept extends to things like power lines used to provide electricity to the manufacturing floor, or computers used to design the product, which are indirectly used in manufacturing. In addition, the SEC clarified that it does not consider an issuer that only services, maintains, or repairs a product containing conflict minerals to be a "manufacturer" for purposes of this rule.

**For companies that collect data from their first tier suppliers using the RMI Minerals Reporting templates, is this considered a "reasonable country of inquiry" (RCOI) under the laws and OECD Guidelines?**

At this time, the RMI Minerals Reporting templates constitute the best infrastructure and data exchange format available. Accordingly, we consider the declaration to constitute a RCOI. However, we will be independently validating the content of the certification against the requisite available information to verify the statements disclosed via the MRTs form.

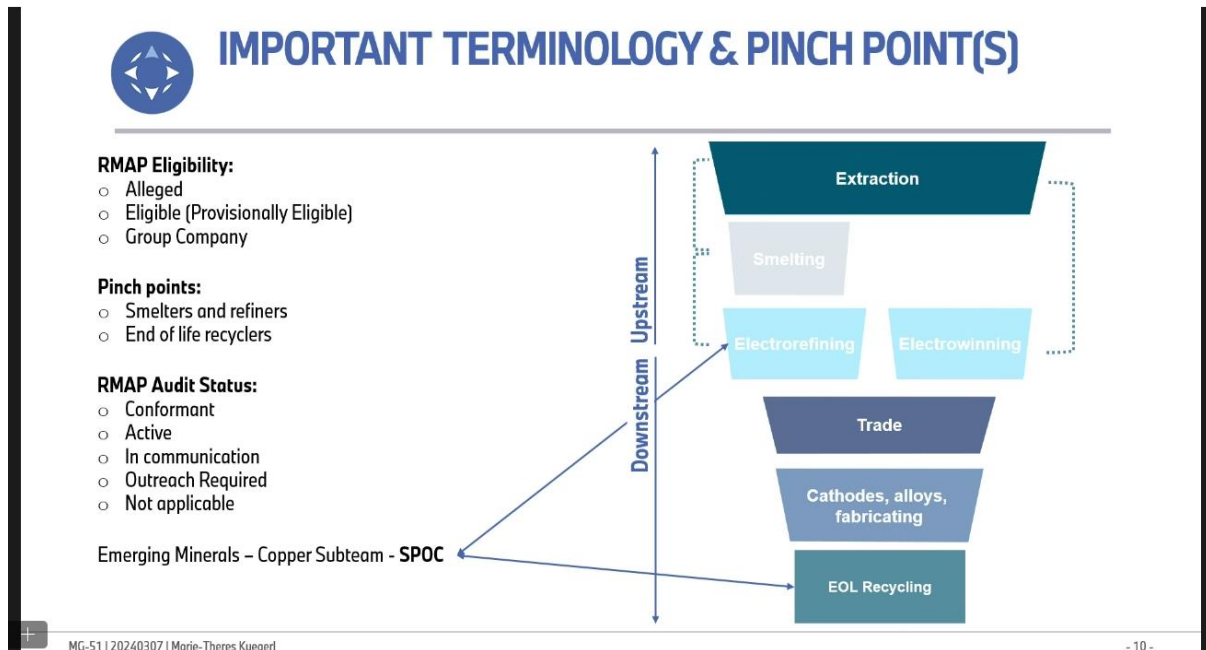
**Why focus on smelters/refiners as the key point in the supply chain?**

The producers and traders of minerals provide them to Smelter or Refiners (SORs) and the SORs provide the resulting metals (or intermediates) to a large number of downstream consumers. Smelting/refining is the conversion point of identifiable types of materials, such as ore concentrates and secondary materials, into a common product for all downstream consumers. Because of this transformation process, SORs are in the position to know the origin of the material before it is commingled and processed for distribution to a wide variety of downstream users. Moreover, SORs are small in number relative to the number of upstream suppliers and



downstream users. For these reasons, smelters/refiners are identified as the "pinch point" of the supply chain.

Visually, the supply chain looks like an hour glass timer with SORs at the middle:



For more information see the RMI E-Learning Academy: [Training \(responsiblemineralsinitiative.org\)](https://responsiblemineralsinitiative.org)

### UNDERSTANDING ERICSSON'S EXPECTATIONS FROM SUPPLIERS

My company does not manufacture the parts we sell to Ericsson; we're just a distributor. Why do I have to respond?

As our direct supplier, we will look to you to help us comply with the rule. You may need to contact your suppliers to fully complete our questionnaire form. Given your company's established business relationships with your suppliers, you are in the best position to do so. For More information about the expectations on the 5 Step OECD Due Diligence Guidelines depending on your company's position in the supply chain , see : "How does the five-step framework apply to you?" here: [OECD - Mineral Supply Chain \(duediligenceguidance.org\)](https://duediligenceguidance.org).

My company has not filled the MRTs and has stated in a separate document that its products do not contain conflict minerals.

This is a very generic answer and doesn't meet Ericsson's requirements. It is not clear to us whether you mean your products don't contain 3TGs or whether your products contain 3TGs but that they do not originate from the DRC.



This is why we require from all hardware suppliers to clearly state this by filling the MRTs. In other words, if the products you supply to Ericsson contain any trace of critical minerals, you are expected to fill the MRTs.

**My company does not directly source minerals, and is in most cases several levels removed from direct mineral sourcing, do we still need to fill MRTs? Are we still required to meet the full OECD Due Diligence Guidance?**

Yes. It is your responsibility to identify if the products you sell to us contain any critical minerals. If the answer is Yes, it is your responsibility to request your suppliers and sub suppliers to fill the relevant MRTs and that you conduct appropriate due diligence to verify the accuracy of responses.

**My company has received the MRTs but we don't provide any product that contain any minerals, e.g. packaging or plastic molds provider, am I still obliged to fill the MRT.**

If your product does not contain any minerals, in this case you are not obliged to fill the MRT. Please send an email to [conflict.minerals.operations@ericsson.com](mailto:conflict.minerals.operations@ericsson.com) and CC your sourcing manager clearly stating this.

However, if your product contains minerals but none of them are listed, we kindly request that you fill the declaration form.

**My company is not publicly listed in the US or the EU, hence it is not obliged to fill Ericsson's Minerals Reporting Templates (MRTs).**

Wrong. Section 1502 of the U.S. Dodd-Frank Act applies to U.S. publicly traded companies that manufacture products containing 3TG. As a publicly traded company and manufacturer of products containing 3TGs Ericsson is obliged to perform reasonable country of origin (COO) enquiries throughout its supply chain. This means we need the collaboration of our Tier 1 suppliers and sub tiers to identify the smelters/refiners and mines of those minerals.

Similar requirements apply under the EU Battery Regulation.

Ericsson's Code of Conduct for Business Partners requires suppliers to make all endeavors to identify the provenance of such minerals. Failure to do so will mean the supplier is in breach with Ericsson's code.

**My company is not a direct importer of 3TGs into the EU, hence it is not obliged to fill Ericsson's Minerals Reporting Templates (MRTs).**

Wrong. Even if you are not a direct importer into the EU, the products that we source from you could contain critical minerals that originate from CAHRAs up the supply chain. Therefore, in order to identify and mitigate human rights and environmental related risks we need identify the origin of such minerals.

The EU Conflict Minerals Regulation applies to upstream companies in the supply chain, which includes importers, local traders, and operations involved with mines, smelters, and refiners. The EU regulation begins the due diligence process right when 3TG enters the EU,





rather than when it is used in the manufacturing of products. This reduces the work involved with going up the supply chain to identify the source of 3TG.

**Ericsson's policy on critical minerals only addresses risks associated to conflict and human rights.**

Wrong. Ericsson's vision is to source minerals responsibly. That is to identify and mitigate any adverse sustainability risks including environmental, OHS and human rights.

This is also aligned with OECD's latest developments. On 21 September 2023, The OECD introduced a new Handbook on Environmental Due Diligence in Mineral Supply Chains, which was developed to help companies embed environmental considerations into their mineral supply chain due diligence procedures. For more information, click here: [Due Diligence - Organisation for Economic Co-operation and Development \(oecd.org\)](https://www.oecd.org/due-diligence/).

**The [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](https://www.oecd.org/due-diligence/) does not cover environmental impacts, hence our due diligence is limited to identify whether the origin of minerals is from CAHRAs.**

Wrong. OECD Due Diligence Guidance for Responsible Supply Chains focuses on the following severe risks that are associated to conflict and high risk areas: Serious human rights abuses, Support to armed groups, Security contracting, Bribery and fraud, Money laundering, Non-payment of dues.

However both OECD and Ericsson are fully committed also to mitigate negative environmental impacts associated to mining. On 21 September 2023, The OECD introduced a new *Handbook on Environmental Due Diligence in Mineral Supply Chains*, which was developed to help companies embed environmental considerations into their mineral supply chain due diligence procedures. For more information, click here: [Due Diligence - Organisation for Economic Co-operation and Development \(oecd.org\)](https://www.oecd.org/due-diligence/).

**How does the OECD Five Step Framework apply to my value chain?**

Depending on where you or your suppliers sit in the value chain, your requirements will vary. Even if you are a trader, the expectation is that you meet the OECD requirements. For more information see the question: "How does the five-step framework apply to you?" here: [OECD - Mineral Supply Chain \(duediligenceguidance.org\)](https://www.duediligenceguidance.org/)

**As a supplier to Ericsson I am only obliged to report on the origin of the legislated minerals, the 3TG. We are not obliged to report on the origin of other critical minerals such as Cobalt and Mica.**

Wrong. If you have submitted the Conflict Minerals Reporting Template (CMRT) you should also submit the AMRT for other minerals. Even if your products do not contain them you should still fill the AMRT clearly stating so.



## ANSWERING ERICSSON'S - RMI MINERALS REPORTING TEMPLATE

### Does Ericsson accept "Conflict-free" declarations?

In past years some suppliers have come back to us declaring that their product is "Conflict-Free" and hence do not see themselves under the obligation to fill the MRT. This is not acceptable. Your obligation is to fill the MRT and provide us with the names of relevant smelter, refiners and mines.

Ericsson does not declare any of its products to be "Conflict Free". The "Conflict-free" label, while referenced and defined in Dodd Frank Act section 1502, does not accurately represent the principle and practice of due diligence as an ongoing process that is expected to be carried out and improved upon over time, where risks incidents are identified, managed, and reported as part of the process as stated in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

### Some of my suppliers are sending me their Conflict Minerals policy and one page declaration saying that they are conflict minerals free. Can I accept that and declare that my supply chain is free of Conflict Minerals?

No. You cannot accept a statement from your supplier saying that they are free from conflict minerals. They need to provide their due diligence information and supporting data in the form of a CMRT file to prove that their supply chain is free of conflict minerals. Without the supporting data, you might fail a customer audit or an independent audit they will ask for supporting documents from your suppliers.

### My company have answered that "to our knowledge, our 3TG minerals (Tin, Tantalum, Tungsten and Gold) do not come from the DRC and that we are committed not to source conflict minerals". Is that enough?

No, that is not a satisfactory answer. Beyond compliance with the Dodd Frank Act, Ericsson expects from suppliers to provide information on the provenance of ALL critical minerals.

Ericsson expects its suppliers to identify the smelter or refiner of such minerals and the mine of origin.

My company have answered that "to the best of our knowledge and based on our internal due diligence efforts, our 3TGs do not originate from the DRC". Is that enough?

This is an unsatisfactory answer on different levels:

1. All due diligence efforts should extend beyond the DRC and cover all CAHRAs
2. You would still be required to fill the MRTs
3. Your due diligence steps should be aligned with the [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas - OECD](#)
4. If your company does not publicly disclose how OECD aligned due diligence is conducted, we require that you provide us with enough evidence to demonstrate



you meet the 5 Due Diligence steps as defined by the OECD. For guidance see [OECD - Mineral Supply Chain \(duediligenceguidance.org\)](https://www.oecd.org/etp/minerals/duediligenceguidance/)

**Does my company have to conduct our assessment on a product by product basis? Or can we conduct your assessment at a higher level (e.g., product line)?**

The scope of the rules extend to products where conflict minerals are necessary to the functionality or production of the product manufactured or contracted to be manufactured. Given the commonality of suppliers across most companies' supply base, companies may choose to do the assessment in the manner they deem most efficient. However, the scope of the rule extends to products, and companies should be prepared to report the results on a product-by-product basis.

Ericsson accepts both identification of smelters at a higher level or by specific product.

**If my supplier says all minerals originated from recycled or scrap materials, what should I do next?**

As part of their "good faith" inquiry process, companies should apply reasonable scepticism and judgment when assessing statements from suppliers and be aware of any red flags that could be counter indicative to the suppliers' statements, such as the pricing of materials, location of the supplier, purity/quality of materials used for products, etc.

Answers should be supported by documentary evidence upon request. Please see Ericsson's separate "Guidance on evidence to be requested to verify the traceability of the origin of minerals".

**My company has a provision in its supplier contracts that says any 3TG we receive will be in compliance with the conflict minerals rule. Is that sufficient for Ericsson?**

No, not by itself. Ericsson would need additional information concerning the performance of your suppliers under that provision. Please see Ericsson's separate "Guidance on evidence to be requested to verify the traceability of the origin of minerals".

**The products my company sells to Ericsson do not contain any 3TGs, or any other critical minerals. How do I respond?**

Simply answer "No" for tantalum, tin, tungsten, or gold for relevant questions in the CMRT and answer no for relevant questions in AMRT. If you have any information on how you reached your conclusion that your products do not contain these materials, please include it in the comment box provided for each mineral in the relevant question in each template.

**The products my company sells to Ericsson contain minerals but some or all are derived from scrap or recycled sources. How do I respond?**

Answer all questions. In the space provided for each mineral in the relevant question, please provide detailed information on how you reached your conclusion that the materials are derived from scrap or recycled sources. Additionally, if you have any documents that support your conclusion (such as certifications from your suppliers), please attach these to your response.



**The products my company sells to Ericsson contain minerals but they aren't all derived from scrap or recycled sources, and none come from a CAHRA. How do I respond?**

Answer all questions. If you respond "No" for a mineral, please explain how you reached your conclusion that the materials do not come from CAHRA in the space provided for the mineral in the relevant question. We expect you will have surveyed 100% of your own suppliers and will provide a list of smelters in your supply chain along with certifications from your suppliers, if available.

**Some of the smelters from my suppliers' CMRTs do not have a RMI smelter identification (CID). Does this mean, the CMRT report is not accurate and can I reject that report?**

The answer is no for the following reasons:

If a smelter does not have a CID number, it does not mean that sourcing from that smelter violates Conflict Mineral laws. This means the RMI has not identified that smelter yet as eligible.

In summary, if there are any smelters in your supplier CMRT file without a CFSI CID number, do not reject the CMRT.

**Do we have to maintain records documenting our company's compliance with the Conflict Minerals Rules?**

According to the EU Battery Regulations, records of the due diligence system should be maintained for a minimum of 10 years.

According to the OECD Due Diligence Guidelines maintenance of appropriate records, for example pursuant to the company's general document retention policy, would be useful in evidencing compliance with the Conflict Minerals Rules, and should form part of any minerals due diligence framework applied by the company. Accordingly, we recommend that a company retain contemporaneously prepared records that document its reasonable country of origin inquiry and due diligence inquiry. Companies should consider following a document retention policy of retaining such records for at least five to eight years, to ensure that documents are retained for a period at least until applicable statutes of limitations expire.

My company has decided to survey our suppliers to determine if the products they provide us contain critical minerals. *How should I reach out to my suppliers? A: You can send a survey request to your suppliers asking them to complete the RMI's CMRT and AMRT: [Conflict Minerals Reporting Template \(responsiblemineralsinitiative.org\)](https://responsiblemineralsinitiative.org) This is a free, standardized reporting template that facilitates the transfer of information through the supply chain regarding mineral country of origin and smelters and refiners being utilized.*



## ABOUT TRACEABILITY REQUIREMENTS

Increasingly, international and customs regulations are requesting companies to develop and operate a system of controls and transparency regarding the supply chain, including a chain of custody or traceability system, identifying upstream actors in the supply chain, along with a description of the raw material, including its trade name and type.

This means Ericsson needs to work with its suppliers to ensure all actors in the supply chain have a traceability system in place that would enable Ericsson identify the origin of a particular mineral or metal.

As the RMI MRT is a self reporting system, we may be requesting from you documentary evidence to support the answers. So we encourage you to map your supply chain as much as possible.

### What does a system of controls and transparency entail?

The system of controls and transparency should enable you to provide Ericsson with full traceability of the product's origin within 15 calendar days. Please note that in some jurisdictions, Ericsson must submit proof of origin for any component part of the product within a maximum of 30 calendar days.

A system of controls and transparency typically includes:

- A map of the supply chain from the manufactured product to the point of origin of the critical mineral, such as the mine.
- The name and address of suppliers.
- The country of origin of the critical mineral and the market transactions from the raw material's extraction to the immediate supplier to the economic operator that places the product on the market.
- The quantities of the critical mineral placed on the market, expressed in percentage or weight.
- Third-party verification reports issued by an accredited body.
- When the raw material originates from a conflict-affected and high-risk area, additional information should be provided in accordance with the specific recommendations for upstream economic operators, as outlined in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. This includes the mine of origin, locations where the raw material is consolidated, traded, and processed, and information on taxes, fees, and royalties paid.

### WHAT HAPPENS AFTER I SEND BACK THE MINERALS REPORTING TEMPLATES?

We will use data on smelters, refiners and mines to screen against own sustainability criteria using a range tools that include:

- RMI's RMAP Status
- Business Intelligence Tools, e.g. Sanctions, Forced Labor Flags, Negative Media, etc.



If the smelters you identify are not RMAP conformant, we will follow up with you to discuss corrective action.

Please note that Ericsson does not penalize suppliers for having Non Conformant RMAP smelters in the supply chain but our goal is to increase the number of Conformant Smelters in our supply chain. Hence we will proactively and positively engage with you and your sub suppliers . We believe in the power of collaboration and joint action to achieve positive impact.

Please note the RMI's RMAP Conformant Status is not equivalent to being risk free. Because the RMAP is limited to verifying's a facility's due diligence process, there could be still other risks associated to that entity, such as operational or ownership level.

When we identify RMI Conformant smelters that have been linked to sanctioned entities or forced labor because of ownership or business relations we inform the RMI.

Being RMI RMAP conformant for a smelter means that the smelter has successfully undergone an independent third-party assessment under the Responsible Minerals Initiative's (RMI) Responsible Minerals Assurance Process (RMAP). This certification verifies that the smelter's sourcing practices for specific minerals (such as tin, tantalum, tungsten, gold—often referred to as 3TG, and cobalt or mica) comply with responsible sourcing standards, particularly in relation to conflict-free supply chains.

Key Aspects of RMAP Conformance for Smelters:

**1. Third-Party Audit:**

- The smelter is assessed against the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- The audit ensures that the smelter does not source minerals that contribute to human rights abuses, environmental harm, or conflict financing.

**2. Transparency & Traceability:**

- The smelter must implement documented policies and procedures to ensure responsible mineral sourcing.
- It must demonstrate a robust chain-of-custody system to track raw materials and prove their ethical origins.

**3. Conformance Status & Listing:**

- If the smelter meets the RMAP requirements, it is added to the RMI's Conformant Smelter & Refiner List, which is widely used by companies for responsible sourcing compliance.
- This listing provides assurance to downstream buyers that the smelter follows best practices in due diligence.

**4. Regular Reassessments:**

- RMAP conformance is not permanent; smelters must undergo periodic re-audits (typically every year) to maintain their status.

## Why RMAP Conformance Matters?

### Regulatory Compliance:

Many companies need RMAP-compliant smelters to comply with regulations like the EU Conflict Minerals Regulation or the U.S. Dodd-Frank Act Section 1502.



### Corporate Responsibility & ESG Goals:

Companies sourcing from RMAP-conformant smelters can ensure they support ethical supply chains.

### Market Access:

Many large electronics, automotive, and industrial companies (such as Apple, Intel, and Tesla) require suppliers to use RMAP-compliant smelters.

Being RMI RMAP conformant is a significant certification for a smelter, demonstrating compliance with ethical sourcing practices and responsible mineral procurement. It provides credibility in the global supply chain and helps businesses meet regulatory and corporate social responsibility requirements.

## TIPS FOR SUPPLIERS

2022 marked the tenth reporting year of the U.S. Conflict Minerals Rule (the [Conflict Minerals Statutory Provision](#)), and stakeholder pressures continue to mount regarding the quality of your organization's conflict minerals policies and their integration into your overall environmental, social, and governance (ESG) strategy.

Now it's a good time to review and update your conflict / critical minerals policies and program. This checklist can help your organization prioritize needs and prepare for the coming year.

Get up to date in new legislative requirements that would affect you, your customers and suppliers.

Review and update your critical minerals policy

After reviewing your policy, your organization can ask these proactive questions to refine its overall critical minerals program:

- Does our policy reflect what we're currently doing? Without regular review, policies can grow stale. Confirm that your critical minerals policy aligns with your corporate responsible sourcing policies and practices.
- Does it reflect our current supplier expectations? Supplier expectations have intensified, so determining what suppliers expect from your policy can help prevent misunderstanding.
- Does it align with commercial customer requirements? Many critical minerals policies are out of sync with customers' needs. Make sure to review those regularly.



- Does it sync with our supplier code of conduct and human rights policies? If you've created or updated these policies, you'll want that reflected in your other ESG-related policies.
- Does it read as an old policy? ESG is rapidly changing, so consider other policy enhancements that reflect those changes.

#### Refine your critical minerals program

- After reviewing your policy, your organization can take these proactive steps to refine its overall critical minerals program:
- Evaluate and refine your due diligence approach. Target any additions to your supplier base or existing blind spots to help make sure your due diligence is evolving – and that it's not just "same as last year."
- Educate your team members. Communicate your policies and procedures broadly and often because your program depends on quality and accuracy.
- Refine your smelter lists. Consult with industry references and filter out any inaccurate information.
- Identify ways to increase spend coverage in your data collection. You can also encourage your suppliers to increase their response rates to improve overall accuracy.
- Monitor Office of Foreign Assets Control (OFAC) and other sanctions and regulations. Staying abreast of changing and new regulations can help identify any additional due diligence or operational adjustments you might need.
- Incorporate critical minerals and other compliance requests into your business. Including these requests in supplier meetings and other business interactions can help reinforce their importance.
- Taking the proactive steps in this checklist can help your organization prioritize long-range filing and policy needs and get positioned for success.

Additionally, we support our suppliers with training and feedback. Below is a list of free resources we recommend to our suppliers:

- [OECD Learning Academy on Responsible Business Conduct](#). Please note there is a special course on OECD Due Diligence for Electronics and Vehicle Parts Supply Chains
- [The UN Global Compact Academy](#). Within the academy these are some of the resources we recommend checking:
  - o [EU Sustainability Navigator Homepage](#)
  - o [Module 2: Getting started with human rights due diligence](#)
  - o [Deepening human rights due diligence](#)