

2026 CMRT & EMRT Training for Responsible Mineral Sourcing

July 2026

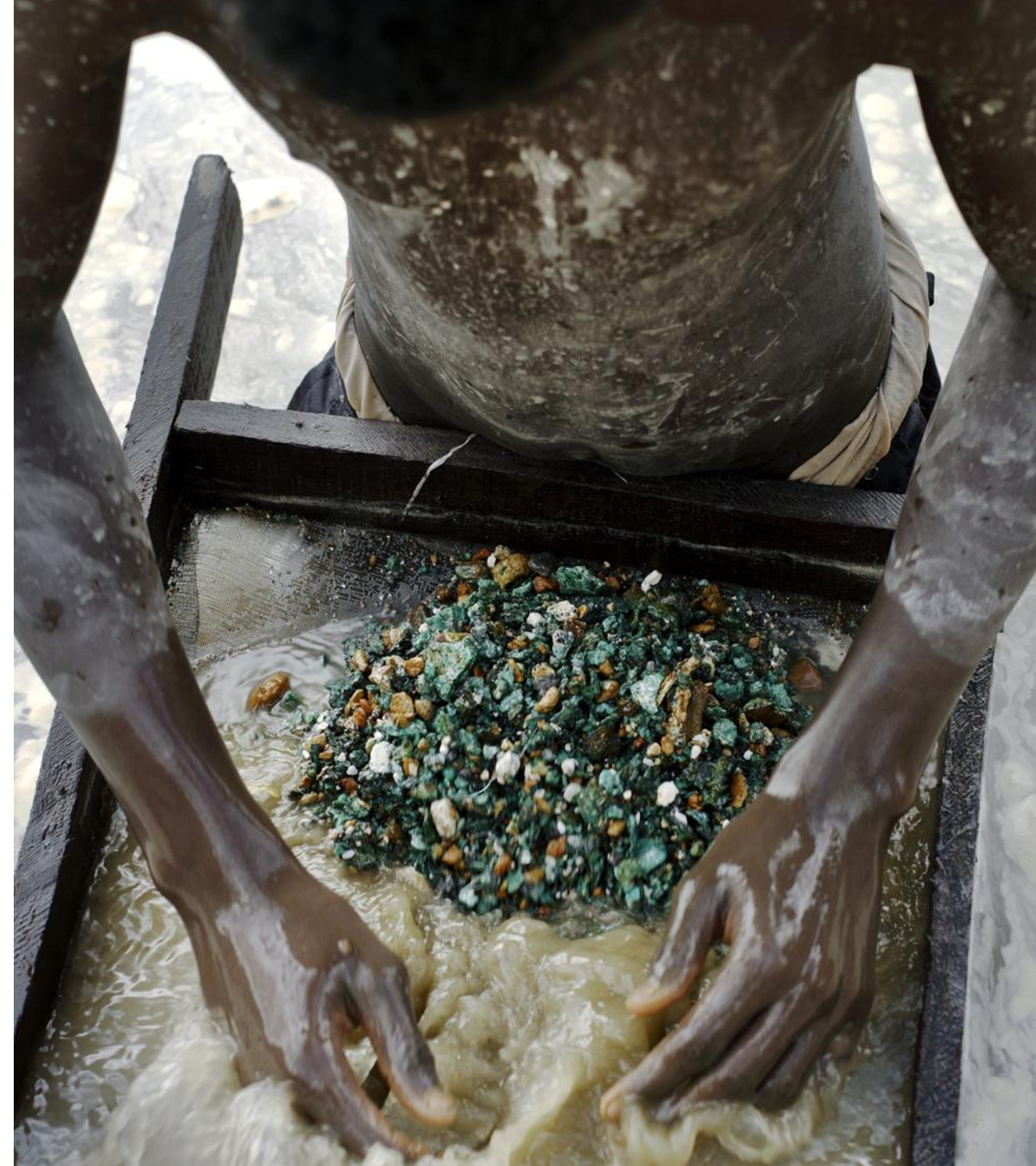


Agenda

01 WHY?
Why we use Conflict & Extended Minerals Reporting
Templates (CMRT & EMRT)

02 WHAT?
What we expect from you

03 HOW?
How to set a responsible sourcing strategy



Why we use Conflict & Extended Minerals Reporting Templates (CMRT & EMRT)

Why CMRT?

Legal requirements for tin, tantalum, tungsten and gold (3TG)

- Dodd-Frank Act Section 1502 requires companies to disclose the origin of 3TG.
- EU Conflict Minerals Regulation requires due diligence for EU importers of 3TG.

Why this matters

- Prevents financing of conflict and human-rights abuses
- Ensures regulatory compliance
- Customers request standardized reporting using the CMRT (industry standard template).

Why EMRT? (Extended Minerals Reporting)

Beyond 3TG, the following minerals are increasingly in focus: Cobalt, Lithium, Nickel, Natural Graphite, Mica, Copper.

Driven by:

- German Supply Chain Due Diligence Act
- Corporate Sustainability Due Diligence Directive
- EU Battery Regulation

Even if not yet mandatory for all suppliers, EMRT is increasingly expected. Why it matters:

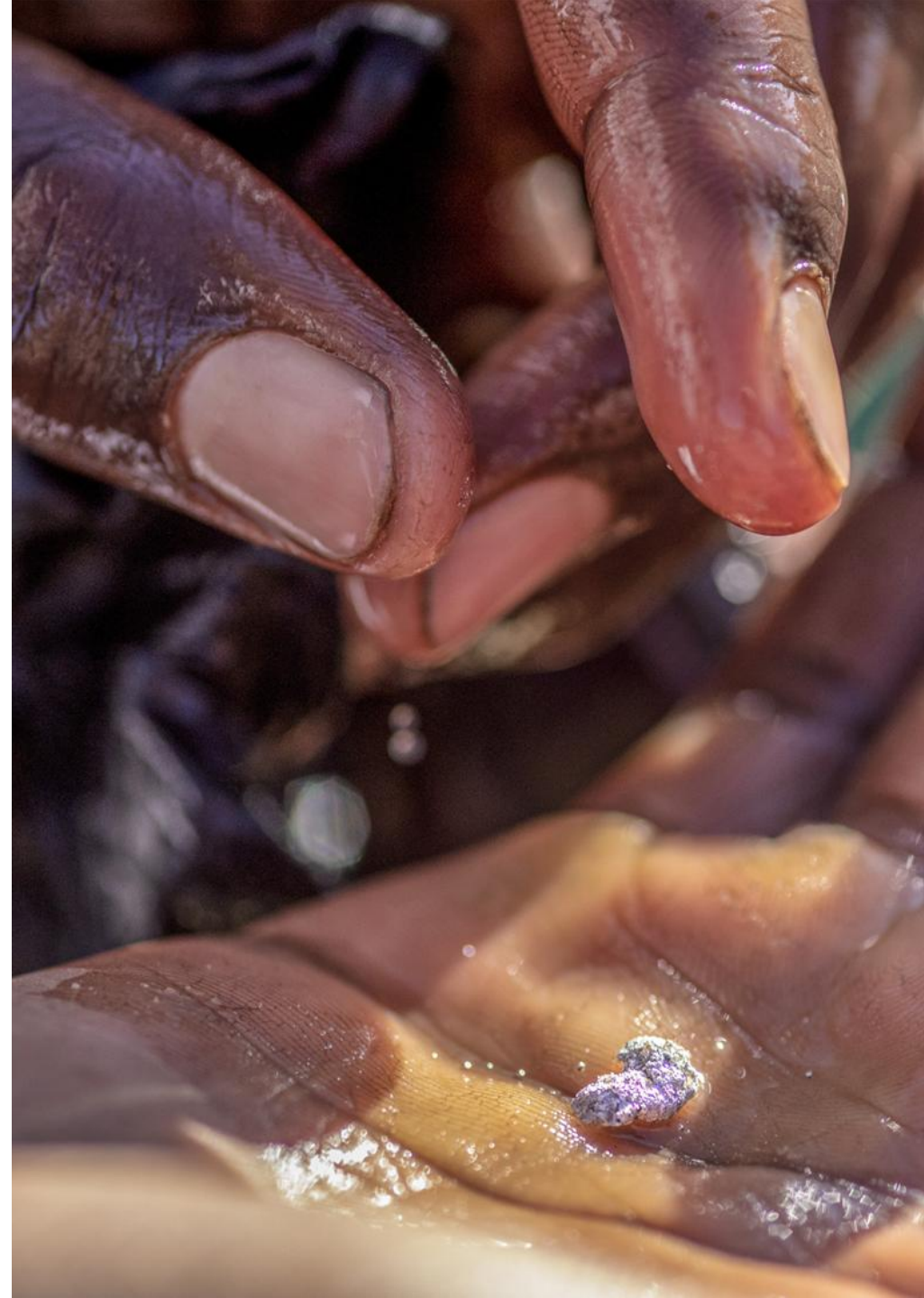
- Supports due diligence
- Addresses human-rights & environmental risks
- Prepares for future regulatory requirements

What This Means for You

By providing complete and accurate CMRT & EMRT:

- You support legal compliance
- You meet customer expectations
- You reduce supply-chain and reputational risks

CMRT & EMRT are not just reporting forms, they are part of responsible and sustainable business practice.



What we expect from you (supplier requirements)

Common Problems & Solutions

Common Problem	Recommended Approach
Suppliers stating: "We are only a distributor, therefore we should not provide CMRT/EMRT."	Distributors are also expected to assess their supply chain and submit a consolidated CMRT/EMRT.
Suppliers uploading only a Responsible Minerals Statement instead of CMRT/EMRT.	A statement alone is insufficient; if reportable minerals are present, the most recent official CMRT/EMRT template should also be submitted.
Suppliers forwarding individual supplier templates separately instead of creating one consolidated template.	Merge supplier data into one company-level CMRT/EMRT before submission.
Outdated CMRT/EMRT templates.	Always use the latest RMI template version for the current reporting year.

Supplier Requirements

Based on the legal, professional and human rights requirements described in the previous slides, we ask you to fulfil the following obligations:

01



Submit by the Deadline

Provide the completed CMRT/EMRT templates by the agreed deadline.

If you are still investigating your supply chain and cannot fill the template in time, please send us a feedback message.

02



Fill In Correctly

Complete all mandatory fields accurately and consistently.

Refer to the next slides for step-by-step guidance on how to fill in the templates properly.

03



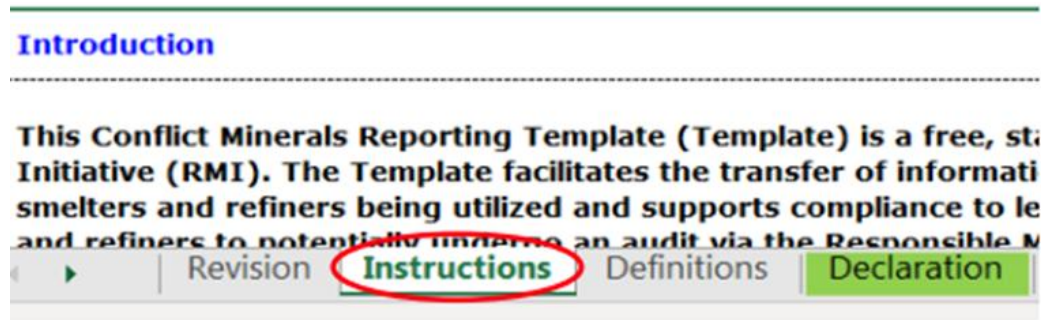
Provide Accurate Data

Ensure the information you submit reflects your actual supply chain.

Inaccurate or incomplete data delays compliance and creates risk for both parties.

How to Fill the Conflict Minerals Reporting Template

Instructions & Definitions Worksheets



This Instruction worksheet provides instructions to complete all the questions listed in Declaration Worksheet i.e.

- Company Information (Row 8-22)
- Question 1 to 8 (Row 25-71)
- Questions at company level (Row 75-89)

Also provides instructions to fill Smelter List Worksheet.

Dodd-Frank	2010 United States legislation 1502 ("Dodd-Frank") (http://www.doddfrank1.com/)
DRC	Democratic Republic of Congo

Navigation tabs: > | Revision | Instructions | **Definitions** | Declaration

The Definitions worksheet provides the definition of list of terms relating to conflict minerals.

How to Fill the Conflict Minerals Reporting Template

Declaration Worksheet

Language Options

Select the preferred language for completing the CMRT.

Company Information

Enter the company's legal name and contact details of the person responsible for the CMRT submission.

Tin, Tantalum, Tungsten and Gold (3TG) Questions

Answer the declaration questions related to the company's use and sourcing of 3TG minerals.

Company Sourcing Policy Information

Provide information about the company's responsible minerals sourcing policies and processes.

Note:

- Fields shown in yellow are mandatory to fill
- If any field turns grey, it should not be filled.

Language Options

Company Information

Tin, Tantalum,
Tungsten And Gold
(3TG) Questions

Company Sourcing
Policy Information

The image shows a screenshot of the Conflict Minerals Reporting Template (CMRT) form. The form is organized into four main sections, each indicated by a bracket on the left side of the image:

- Language Options:** This section includes a header with the European Union flag and the title 'Conflict Minerals Reporting Template (CMRT)'. It contains fields for 'Language' and 'Version'.
- Company Information:** This section contains fields for 'Company Name', 'Address', 'City', 'Country', 'Postal Code', 'Phone', 'Email', and 'Website'.
- Tin, Tantalum, Tungsten And Gold (3TG) Questions:** This section contains a series of questions related to the company's use and sourcing of 3TG minerals. Each question has a 'Yes/No' column and a 'Comments' column. The 'Yes' fields are highlighted in yellow, indicating they are mandatory.
- Company Sourcing Policy Information:** This section contains fields for 'Sourcing Policy', 'Responsible Minerals Sourcing Policy', and 'Responsible Minerals Sourcing Process'.

How to Fill the Conflict Minerals Reporting Template

Company Information

Company Information	
Company Name (*):	
Declaration Scope or Class (*):	
Description of Scope:	
Company Unique ID:	
Company Unique ID Authority:	
Address:	
Contact Name (*):	
Email - Contact (*):	
Phone - Contact (*):	
Authorizer (*):	
Title - Authorizer:	
Email - Authorizer (*):	
Phone - Authorizer:	
Effective Date (*):	

Declaration

Smelter List

Checke

Product List

Smelter

General Guidelines:

- **Company Name:** Write your complete company legal name.
- **Declaration Scope or Class:** Select any option from the drop down.
 - A. **Company:** This means you are reporting 3TG data at company level. Hence, this report should cover all the products manufactured/sold by your company.
 - B. **Product:** The CMRT contains only products that are sold to dormakaba. If you select this declaration, then please update the products in the **Product List** worksheet.
 - C. **User defined :** If you select this declaration then it is mandatory to fill description of scope.
- **Email ID:** Provide one correct email contact in the CMRT
- **Effective Date:** Should be of current reporting year. Cannot be a future date.

How to Fill the Conflict Minerals Reporting Template

Tin, Tantalum, Tungsten, Gold (3TG) Questions

1) Is any 3TG intentionally added or used in the product(s) or in the production process? (*)	Answer
Tantalum (*)	
Tin (*)	
Gold (*)	
Tungsten (*)	

2) Does any 3TG remain in the product(s)? (*)	Answer
Tantalum (*)	
Tin (*)	
Gold (*)	
Tungsten (*)	

From the drop-down menu, select the correct answer for each mineral and if required provide comments in the comments box.

Question 1:

- If you answer "No" for any mineral in Question 1 then question 2 to 8 are automatically blocked out for that mineral
- If you answer "No" for all the minerals, your declaration is considered complete.
- If you answer "Yes" for any mineral in Question 1, then Question 2-8 are to be filled for that mineral.

Question 2: The same logic as question 1 applies.

How to Fill the Conflict Minerals Reporting Template

Tin, Tantalum, Tungsten, Gold (3TG) Questions

3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC term, see definitions tab) (*)

	Answer
Tantalum (*)	
Tin (*)	
Gold (*)	
Tungsten (*)	

4) Do any of the smelters in your supply chain source the 3TG from conflict-affected and high-risk areas? (*)

	Answer
Tantalum (*)	
Tin (*)	
Gold (*)	
Tungsten (*)	

Answer options:

- Yes
- No
- Unknown

Question 3:

If Question 3 is answered "YES" or "NO", please provide the list of smelters or mines that source from these countries in the comments.

Question 4:

If Question 4 is answered "YES" or "NO", please provide the list of smelters or mines that source from these countries in the comments.

Note: Provide the list of all smelters in Smelter List work list.

N	O	P
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Name of Mine(s) or if recycled or scrap sourced, enter "recycled" or "scrap"	Location (Country) of Mine(s) or if recycled or scrap sourced, enter "recycled" or "scrap"	Does 100% of feedstock originate from recycled or scrap?
Revision	Instructions	Definitions
Declaration	Smelter List	Checker
Product List	Smelter List	

How to Fill the Conflict Minerals Reporting Template

Tin, Tantalum, Tungsten, Gold (3TG) Questions

5) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources? (*)

	Answer
Tantalum (*)	
Tin (*)	
Gold (*)	
Tungsten (*)	

Answer option:

- Yes
- No
- Unknown

Question 5:
1.If your answer to this question is "Yes" then you are required to fill column N,O and P in Smelter List worksheet.
2.If the recycler or Scrap sources are unavailable, please answer Question 5 as "Unknown".

N	O	P
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Name of Mine(s) or if recycled or scrap sourced, enter "recycled" or "scrap"	Location (Country) of Mine(s) or if recycled or scrap sourced, enter "recycled" or "scrap"	Does 100% of the smelter's feedstock originate from recycled or scrap source

Revision | Instructions | Definitions | Declaration | **Smelter List** | Checker | Product List | Smelter Look-up

How to Fill the Conflict Minerals Reporting Template

Tin, Tantalum, Tungsten, Gold (3TG) Questions

6) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)

	Answer
Tantalum (*)	
Tin (*)	
Gold (*)	
Tungsten (*)	

Answer options:

- 100%
- Greater than 90%
- Greater than 75%
- Greater than 50%
- 50% or less
- None

Question 6:

If your answer is greater than none you must list all the smelters identified in Smelter List worksheet.

N	O	P
---	---	---

Name of Mine(s) or if recycled or scrap sourced, enter "recycled" or "scrap"	Location (Country) of Mine(s) or if recycled or scrap sourced, enter "recycled" or "scrap"	Does 100% of the smelter's feedstock originate from recycled or scrap source

Revision

Instructions

Definitions

Declaration

Smelter List

Checker

Product List

Smelter Look-up

How to Fill the Conflict Minerals Reporting Template

Tin, Tantalum, Tungsten, Gold (3TG) Questions

7) Have you identified all of the smelters supplying the 3TG to your supply chain? (*)

	Answer
Tantalum (*)	
Tin (*)	
Gold (*)	
Tungsten (*)	

8) Has all applicable smelter information received by your company been reported in this declaration? (*)

	Answer
Tantalum (*)	
Tin (*)	
Gold (*)	
Tungsten (*)	

Answer options:
- Yes
- No

Question 7 and 8:

If Question 7 is answered "Yes" then you must list all the smelters information in **Smelter List** worksheet and answer "Yes" for Question 8.

N	O	P
---	---	---

Name of Mine(s) or if recycled or scrap sourced, enter "recycled" or "scrap"	Location (Country) of Mine(s) or if recycled or scrap sourced, enter "recycled" or "scrap"	Does 100% of the smelter's feedstock originate from recycled or scrap source

Revision	Instructions	Definitions	Declaration	Smelter List	Checker	Product List	Smelter Look-up
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How to Fill the Conflict Minerals Reporting Template

Company Sourcing Policy Information

Question	Answer
A. Have you established a responsible minerals sourcing policy? (*)	
B. Is your responsible minerals sourcing policy publicly available on your website? (Note – If yes, the user shall specify the URL in the comment field.) (*)	
C. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program? (*)	
D. Have you implemented due diligence measures for responsible sourcing? (*)	
E. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)	
F. Do you review due diligence information received from your suppliers against your company's expectations? (*)	
G. Does your review process include corrective action management? (*)	
H. Is your company required to file an annual conflict minerals disclosure? (*)	

Golden rule:

Only answer “Yes” if the process is documented, implemented, and verifiable.

“Yes” Answers Should Be Supported By:
written policies or procedures,
supplier requirements / Code of Conduct,
CMRT/EMRT collection process,
risk assessment and follow-up activities,
training and internal responsibilities,
records that can be shared during customer
or audit reviews.

Strong and Weak Templates

Indicator	CMRT / EMRT Reference	✓ Strong	✗ Weak
Complete Smelter / Processor List	Smelter/Processor List	All smelter/processor names are individually and completely listed	Missing names, aggregated entries, or incomplete list
Valid Smelter IDs (CID / SSN)	Smelter ID fields	IDs match RMI records (valid CID/SSN)	"Not listed," name-only entries, or unmatched IDs
CAHRA / Covered Country Substantiation	CMRT Q3–Q4	CAHRA determination supported with comments and sources	Blank, unsupported, or no evidence provided
Clear Mineral Scope & Consistency (3TG / Extended Minerals)	CMRT / EMRT Q1–Q2	Each mineral clearly declared; answers consistent across Smelter List, CAHRA, and recycled content sections	Scope unclear or inconsistent/contradictory responses
Supplier Response Rate	CMRT Q6 / EMRT Q5	~100% supplier response rate / high coverage	Low supplier response rate / limited coverage
Policy & Public Availability	Policies & Actions A–B	Conflict minerals policy exists and is publicly available	Policy missing or not publicly accessible
Supplier Requirements for Audited Smelters	Policies & Actions C	Requires audited smelters (e.g., RMAP)	No requirement for audited/validated smelters
Due Diligence / Review / Corrective Action	Policies D–G	Documented due diligence process, review mechanism, and corrective actions	No review process or corrective action
Timeliness / Contact / Effective Date	Mandatory Fields	All required fields completed, up to date, and valid	Missing, outdated, or incomplete mandatory information

How to set a responsible sourcing strategy (to support policy questions and produce strong CMRT & EMRT)



Strategy for Responsible Minerals Sourcing

1

- Establish Company Commitment & Policy

2

- Conduct Supply Chain Assessment

3

- Identify and Address Risks



1) Policy Essentials

Purpose: avoid financing conflict and prevent human-rights/environmental harm (focus on 3TG and CAHRA minerals).

Scope: applies to all suppliers/sub-suppliers providing products or components that may contain 3TG or other relevant minerals.

Core commitments (OECD 5-step aligned): management system; identify & assess risks; respond to risks; prioritize validated smelters/refiners; reporting & continuous improvement.

Governance: designate responsible person, communicate expectations, integrate requirements into contracts, keep records.

dormakaba Statement of Commitment on Responsible Minerals Sourcing

This Statement of Commitment on Responsible Minerals Sourcing formalizes and specifies the commitment of dormakaba to not contribute to conflict or human rights infringements when sourcing minerals.

Subject matter and objective

The objective of this Statement of Commitment is to provide a common framework for the company's due diligence process specifically related to the mineral supply chain which may potentially originate from conflict-affected or high-risk areas.

Conflict-affected and high-risk areas are identified by the presence of armed conflict, generalized violence or other risks of harm to people. Armed conflict can take various forms, such as a conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation, or insurgencies, civil wars, etc. High-risk zones may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence. These areas are often characterized by widespread human rights abuses and violations of national or international law.

dormakaba is committed to proactively establishing a responsible supply chain management of minerals which may originate from conflict-affected and high-risk areas.

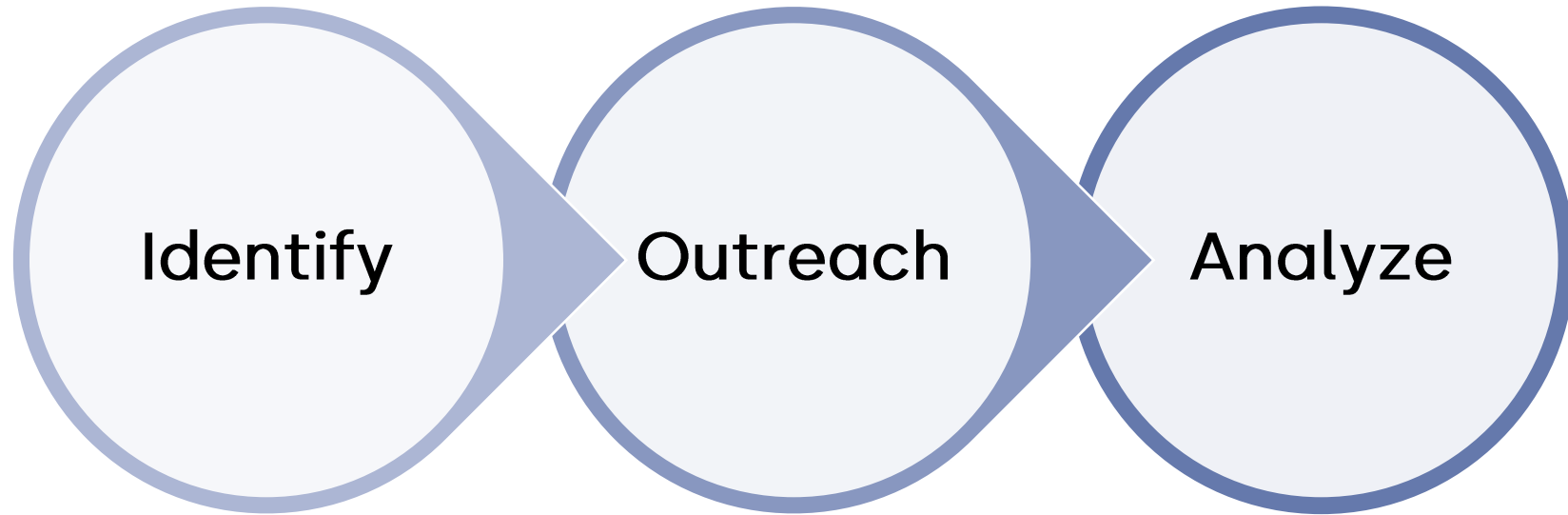
Purpose

As a company procuring electronic components, dormakaba acknowledges its responsibility to take action to increase transparency in its mineral supply chains, in particular regarding the potential human rights violations during the mining process of certain minerals.

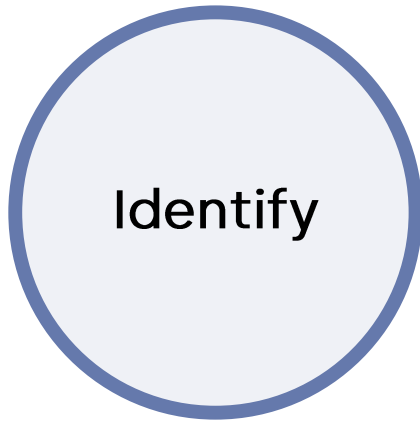
However, dormakaba is far removed from the extraction of minerals in the value chain, and does not directly purchase or import raw ore or unrefined minerals. These minerals may be contained in small quantities in components of dormakaba products. Hence, the company relies on collaboration with its supplier base to identify and manage the risks associated with potential links to conflict-affected or high-risk areas by the

2) Supply Chain Assessment

Goal: Identify parts with 3TG/extended-minerals risk, get valid CMRT/EMRT from your suppliers and analyze results



2) Supply Chain Assessment



Identify and prioritize risky parts: Scan your BOM to find parts that may contain 3TG or extended minerals (e.g., solder, connectors, plated contacts, capacitors/resistors, tungsten, tantalum capacitors, gold plating, cobalt cathodes, mica insulators).

For each risky part, list the supplier and part number, then **prioritize by annual spend**. Start outreach with the highest spend parts first.

2) Supply Chain Assessment



Outreach

Request CMRT & EMRT from suppliers: Request both CMRT (for 3TG) and EMRT (if extended minerals are in scope). Point them to the standard templates and ask for the latest version.

Dear [Supplier's Name],

As part of dormakaba's **annual Minerals Compliance Campaign 2025/2026**, we would like to take responsibility together with you for building a sustainable and ethical supply chain. To this end, we are collecting information on conflict minerals (tin, tungsten, tantalum, gold) as well as on other relevant raw materials such as cobalt, mica, copper, natural graphite, lithium, and nickel.

Since supply chains are constantly evolving and the CMRT and EMRT templates are regularly updated, it is crucial to use the most recent versions. This ensures that we comply with the latest regulatory requirements and provide full transparency to our customers.

Why your participation matters

With your support, we can:

- meet international requirements such as the U.S. Dodd-Frank Act, the EU Conflict Minerals Regulation, the Swiss Responsible Business Initiative, and the German Supply Chain Due Diligence Act,
- fulfil our customers' expectations for responsible business practices,
- and actively contribute to a more sustainable future.

What we need from you

1. Please complete the **2026 Minerals Compliance Survey**: [\[survey link\]](#)
2. Upload your completed reporting templates through the survey:
 - **CMRT** – for tin, tungsten, tantalum, and gold
 - **EMRT** – for cobalt, mica, copper, natural graphite, lithium, and nickel

2) Supply Chain Assessment



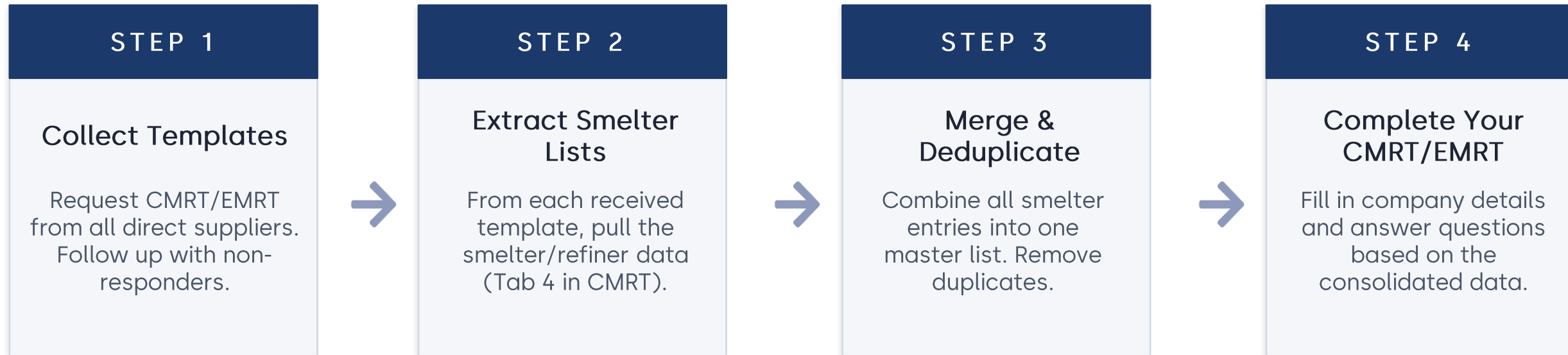
Analyze received CMRT / EMRT:

Check:

- **Minerals in scope** (3TG vs extended).
- **Smelter/refiner names + IDs** are present (SMELTER IDs should match the RMI smelter list). If a smelter is unknown or blank, flag it.
- **Country of origin** / % recycled content provided.
- **Completeness:** missing required fields, "unknown", or generic answers -> mark as **non-conforming**.

Capture answers in one central spreadsheet (supplier, part, spend, status).

Consolidating Supplier Templates



Why this matters: Forwarding individual supplier templates directly to dormakaba is not sufficient for our system integration. A consolidated, company-level CMRT/EMRT enables accurate data entry into our compliance platform and ensures your response is properly processed.

3) Risk Analysis

Risk Type	Description	Action Priority
Critical	Unknown/unverified smelters, CAHRA sourcing	Immediate action
High	Missing smelter IDs, incomplete country of origin	Follow-up within short timeframe
Low / OK	Complete, verified, strong CMRT/EMRT	No immediate action

Additional Resources for Further Learning

Websites & Guidelines

[OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)

[Responsible Minerals Initiative \(RMI\): Responsible Sourcing Tool](#)

Educational Videos

[OECD Due Diligence Video](#)

[Responsible Minerals Initiative Overview](#)

Training & Tutorials

[OECD Online Training on Due Diligence](#)



Disclaimer

This training is provided for informational purposes only and is intended to support suppliers in understanding CMRT and EMRT reporting requirements. It does not constitute legal or regulatory advice and does not guarantee compliance with applicable laws, regulations, or customer requirements. Suppliers remain solely responsible for conducting their own due diligence and for the accuracy and completeness of the information they report. Official guidance issued by the Responsible Minerals Initiative (RMI) and applicable regulatory authorities should be consulted where appropriate.