



**August 2, 2023**

Nikhil S Dhruv  
Bangalore Refinery  
#6/1, 1st Cross, 1st Stage Peenya, KIADB Main Road Next to RTO Driving Test Track  
Bangalore, Karnataka 560 058  
India  
nikhil@bangalorerefinery.com

Dear **Nikhil S Dhruv**,

Thank you for your participation in the Responsible Minerals Initiative (RMI) Responsible Minerals Assurance Process (RMAP).

The RMI has reviewed the process and results of **Bangalore Refinery's** Responsible Minerals Assurance Process Assessment for **Gold (2017)**, conducted at the following location on the following dates:

SITE	Bangalore Refinery
ADDRESS	#6/1, 1st Cross, 1st Stage Peenya, KIADB Main Road Next to RTO Driving Test Track
ADDRESS	Bangalore, Karnataka 560 058 India
ASSESSMENT DATE	10/27/2020 - 10/28/2020

Based on the Auditor's findings and the RMI's quality control review process, **Bangalore Refinery** remains non-conformant for the following protocol requirements:

<b>Question #</b>	DDD-3
<b>Question</b>	Is the procedure to identify CAHRAs reasonable?
<b>Auditor Conclusion</b>	Non-conform
<b>Finding Summary</b>	The procedure to identify Conflict-Affected and High-Risk Areas is not reasonable because the resource selected does not refer to Dodd Frank act and EU CAHRA list.
<b>Standard Reference</b>	Section VIII.B.4
<b>Suggested Improvement Measure</b>	The list of CAHRAs must include, at a minimum: 1) The Democratic Republic of the Congo (DRC) and its nine adjoining countries as outlined in Section 1502 of the Dodd Frank Act, namely Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia; and 2) the indicative list of CAHRAs provided by the European Commission pursuant to Article 14.2 of the European Union Regulation 2017/821. <a href="https://www.cahraslist.net">https://www.cahraslist.net</a>

In accordance with Section VI.D. of the Responsible Minerals Assurance Process Assessment Procedure (2018), auditees that have repeat non-conformance issues identified, or are unable to complete closure on open items within the three-month post-assessment Corrective Action Plan period can be deemed non-conformant and can be exempted from participating in the RMAP for a period of six months.

As a result, **Bangalore Refinery** will be removed from the RMAP Conformant Site list for a period of at least six months. At that time, **Bangalore Refinery** may be eligible to reapply for a full RMAP assessment. The assessment will follow the same review and scheduling process. Any required re-assessments will follow the same payment and scheduling process as the original

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assessment.

At this time, RMI recommends that **Bangalore Refinery** enter into an Extended CAP (ECAP) period subject to the Extended CAP policy on the RMI website. Please notify the RMAP Program Manager within one week if **Bangalore Refinery** will enter into an Extended CAP.

Please contact the RMAP Program Manager with any questions.

Thank you for participating in the Responsible Minerals Assurance Process.

Sincerely,

Responsible Minerals Initiative