



UNDERSTANDING EXTENDED MINERALS

MEETING DUE DILIGENCE REQUIREMENTS UNDER BATTERY REGULATIONS

Speaker Introduction

CHUCK LEPARD



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[LINKEDIN PROFILE](#)

- Degrees in Electrical & Computer Engineering and Computer Science
- Honorable Discharge, United States Navy
- 40+ Years EDS/General Motors/Hewlett Packard / HPE / EntServ / DXC
- Decades of plant floor and engineering experience in related areas
- Advisor to multiple manufacturing industry groups
 - Automotive Industry Action Group, International Aerospace Environmental Group,
 - Association of Equipment Manufacturers, Responsible Materials Initiative
- Leader in Standards Development organizations
 - American National Standards Institute (ANSI), International Standards Organization (ISO) Technical Committee TC-111 on Environmental Sustainability Data Exchange
 - IPC 2-18 175x family for Product Declaration and Compliance reporting

Speaker Introduction

MONIKA E. KOTKOWSKA

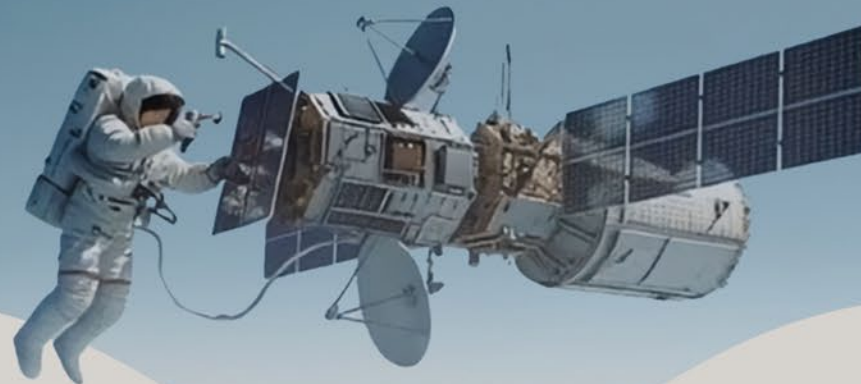


**SENIOR CDX CONSULTANT / REGULATORY
PRODUCT COMPLIANCE EXPERT**

MONIKA.KOTKOWSKA@DXC.COM

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- Specializes in Regulatory Product Compliance, ESG, and Chemical Management Solutions
- MBA with thesis on Digital Product Passport for sustainable sourcing and monitoring of critical raw materials in EV battery production
- Master's degree in Chemistry and Engineering from University of Technology in Wroclaw, Poland
- 10+ years in global regulatory product compliance, ESG and chemical management
- Certified Agile, SCRUM, PRINCE Project Manager
- Active member of automotive, aerospace environmental, and equipment manufacturing industry groups



115,000+
Employees

60+
Years of innovation

70+
Countries

DXC'S ECOSYSTEM FOR MATERIAL COMPLIANCE

INTERNATIONAL
MATERIAL DATA
SYSTEM

CDX



Material Collector System

IMDS / CDX / MaCS

enables companies to

- **collect,**
- **validate,**
- **and manage**

material compliance data across global supply chains - supporting regulatory & sustainability goals.

Whether used standalone or fully integrated into internal systems, our solutions ensure

- **secure,**
- **efficient,**
- **and transparent compliance operations.**

Learn more on mdsystem.com and cdxsystem.com



**A LEADING PLATFORM FOR
SUSTAINABLE SUPPLY CHAIN
COMMUNICATION & ANALYTICS**

2011

Developed

17K+

Registered
Companies

64K+

Registered
Users

89+

Countries where
CDX is used

2M+

Material Data
Sheets (MDS)

66K+

Conflict & Extended
Materials Declarations

As active members of international associations, CDX work closely with industries to shape standards and develop solutions that drive compliance forward.





Material Compliance

Collect, validate, and manage product material declarations across global supply chains.



Responsible Sourcing

Mineral due diligence platform for CMRT and EMRT supply chain reporting.



BPO Services

Managed compliance support for supplier engagement and reporting execution.

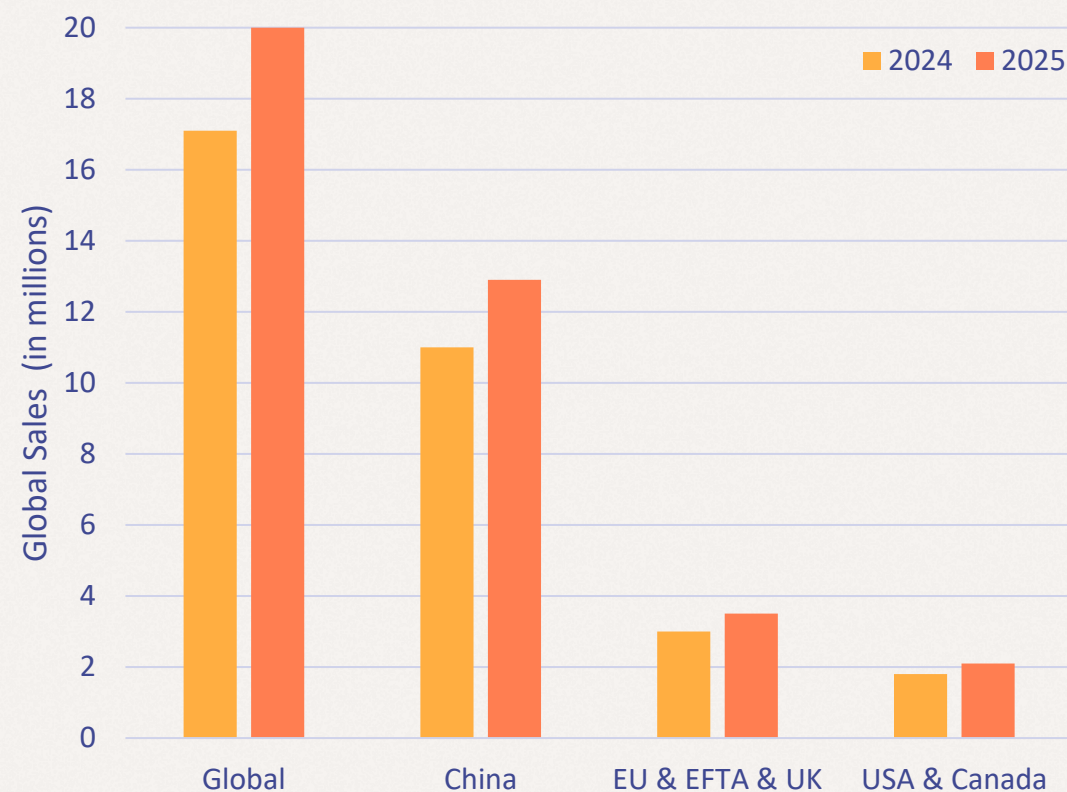


AGENDA

- 1 Regulatory landscape for batteries and critical raw materials
- 2 From Conflict Minerals to Extended Minerals and EMRT
- 3 Using EMRT data to meet EU Battery Regulation due diligence expectations
- 4 Beyond Battery Regulation: CSRD, CSDDD, EU Taxonomy
- 5 CDX in practice – from EMRT files to digital battery data
- 6 CDX System demonstration
- 7 Q&A

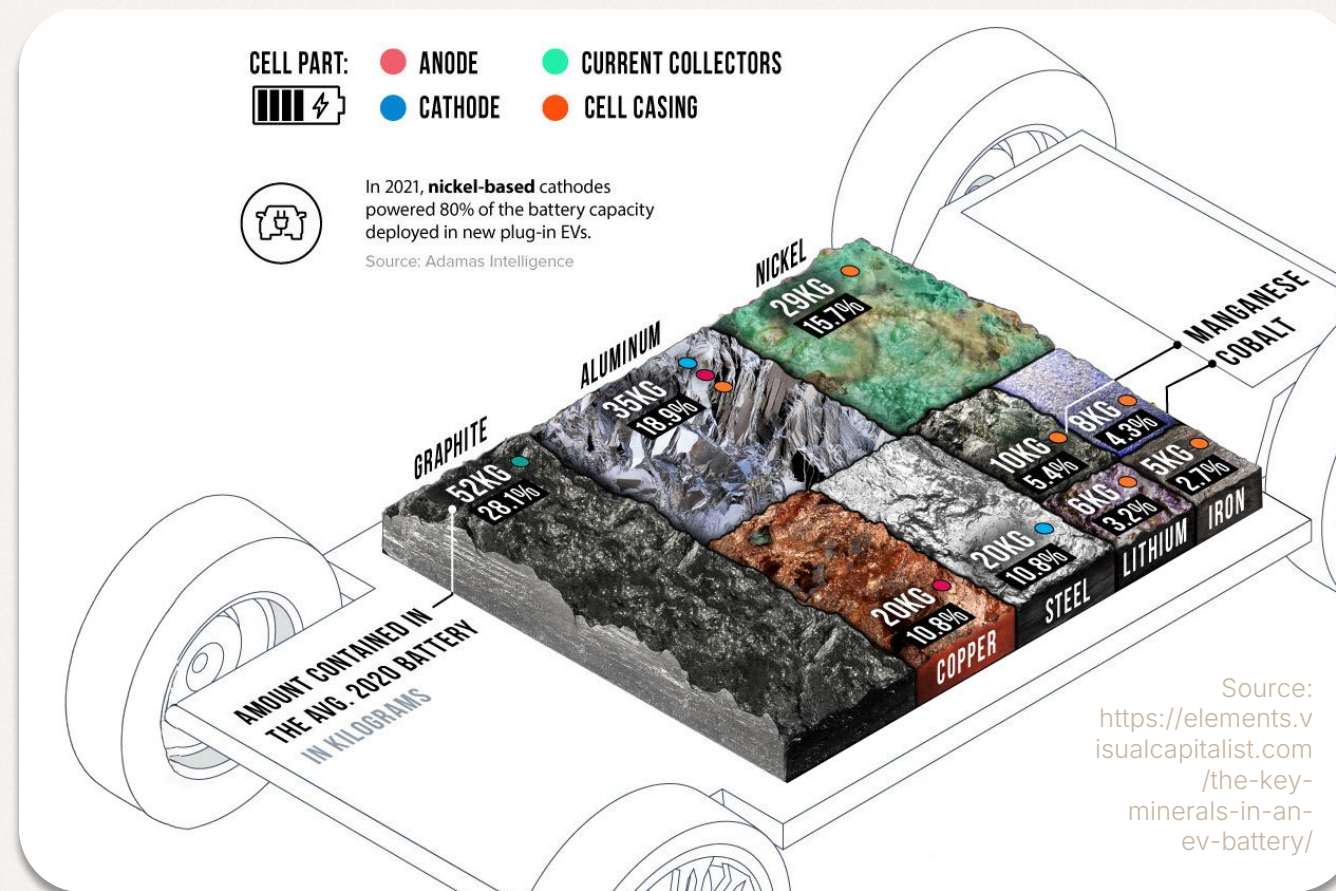
WHY EXTENDED MINERALS TOPIC MATTER FOR BATTERIES

Global Electric Vehicle Sales Growth



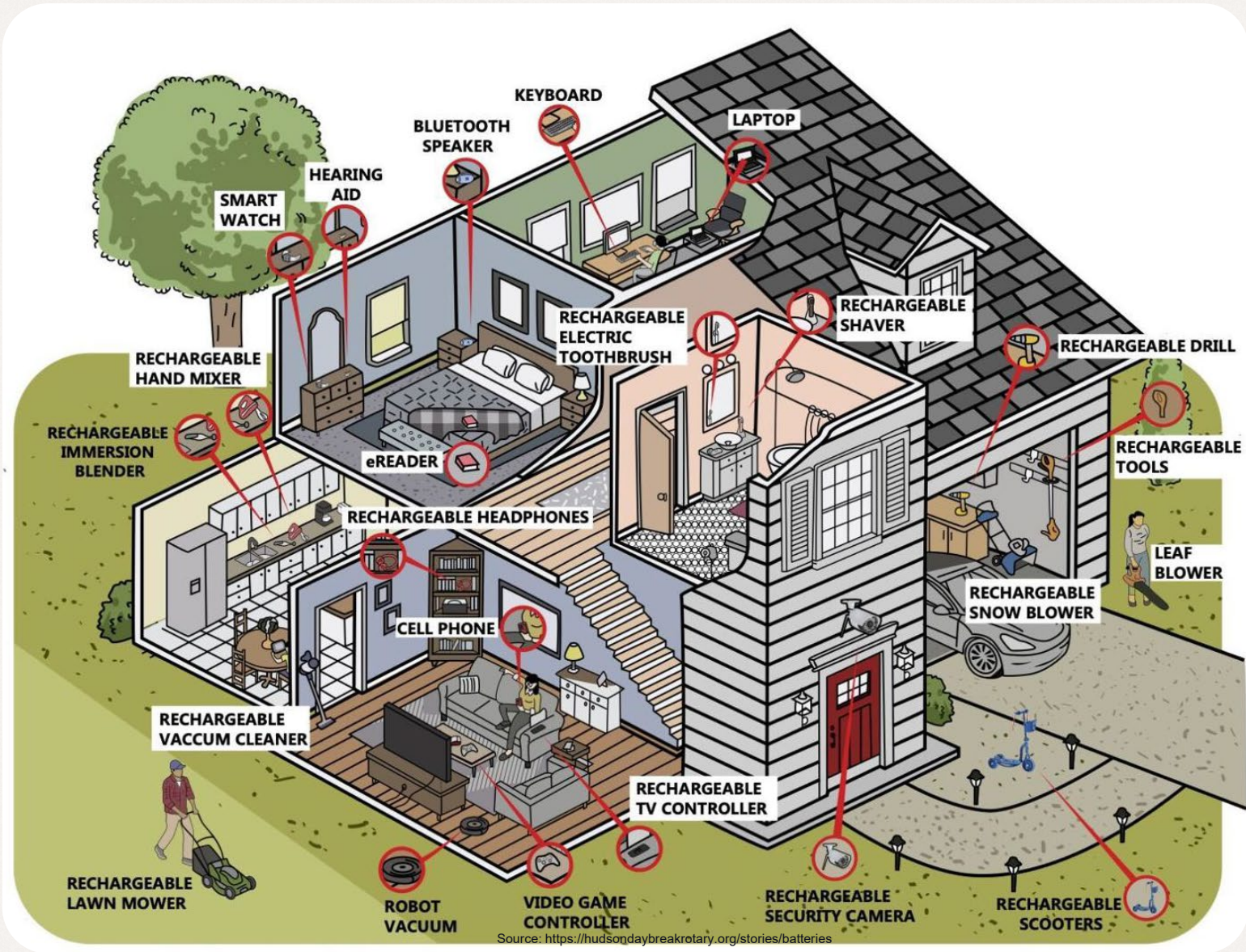
Source: Original compilation based on *Rho Motion View: Over 20M EVs to be Sold Globally in 2025*

What's Inside an EV Battery?



Example shown for EV traction batteries – the same critical minerals are also used in Light Means of Transport (LMT) and many industrial batteries.

Batteries are Increasingly Everywhere



Industrial Machinery

Electric forklifts, Electric carts, Power tools, Elevators

Uninterruptible Power Supply

Relay base stations for communication, Data centers

Mobile Device Field

IoT sensors, Wearable devices

Source: <https://www.heltec-energy.com/news/from-smartphones-to-cars-why-lithium-batteries-are-used-in-various-scenarios/>

Advanced Technology Field

Satellites, Robots, Submarines

Video cameras	Walkie talkies (2 way radio)	GPS devices	Radio controlled toys
Cameras	Scanner	Cellular Phones	MP3 players
Bluetooth headsets	Smartphones/mobiles	Laptop computers	Shavers

WHY EXTENDED MINERALS TOPIC MATTER FOR BATTERIES

The Global Supply Chain Chokepoint

Main Mineral Producers in 2025

Graphite (natural)

China – 77.8%
Madagascar – 4.4%
Mozambique – 3.3%
Brazil – 3.6%

Cobalt

DR Congo – 74.2%
Indonesia – 14.2%
Australia – 1.2%

Lithium

Australia – 31.7%
China – 21.4%
Chile – 19.3%
Argentina – 7.9%

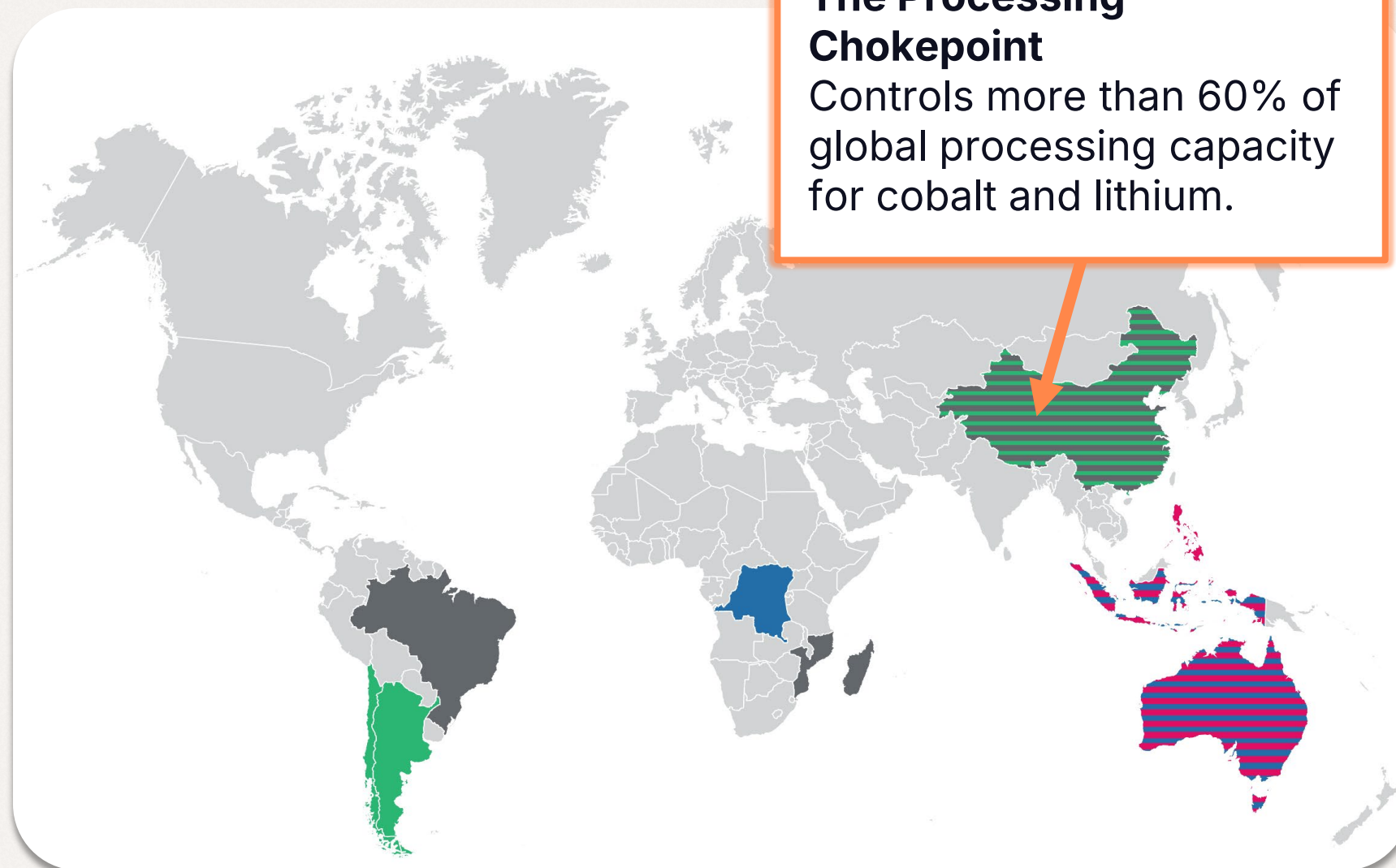
Nickel

Indonesia – 66.7%
Philippines – 6.9%
Russia – 5.1%

Source: Mineral Commodity Summaries 2026, USGS

The Processing Chokepoint

Controls more than 60% of global processing capacity for cobalt and lithium.



GLOBAL REGULATORY FRAMEWORK FOR MINERALS



US Dodd-Frank Section 1502 (3TG)

- Conflict minerals reporting for SEC-listed companies using 3TG from **DRC region**.
- Enacted in 2010; reporting mandatory since 2014.
- Required all **US publicly traded** companies to report to the SEC if 3TG is present in their supply chain.
- Triggered creation of **CMRT & IPC-1755**.
- **Foundation:** OECD Due Diligence Guidance for Conflict-Affected & High-Risk Areas.

Note: A bill in the US House (H.R. 7085) proposes changes to current SEC conflict minerals reporting, but this is not law yet



EU Conflict Minerals Regulation (3TG)

- Applies to **EU-based importers** of 3TG from conflict-affected and high-risk areas (CAHRAs) worldwide.
- Entered into force in 2021.
- All imported 3TG is subject to **regulation**, including processed metals, mineral ores, or concentrates.
- Refers explicitly to **OECD Due Diligence Guidance** for upstream companies.
- **Scope:** Direct importers above volume thresholds; downstream reporting voluntary.



EU Battery Regulation, CRMA & CSDDD

- **Battery Regulation** introduces due diligence obligations for **cobalt, lithium, nickel and natural graphite** across all battery types
- CRMA and Green Deal/CEAP secure **strategic raw materials and circularity** for EU industry.
- **CSDDD** moves due diligence from voluntary to mandatory across global value chains, including minerals.
- **Link to Extended Minerals:** EMRT provide the structured data needed to demonstrate Battery Regulation compliance.

RESPONSIBLE MINERALS TEMPLATES

CMRT

- **C**onflict **M**inerals **R**esponsible Template
- Mandatory for SEC-listed companies and EU importers of 3TG
- Aligns with IPC-1755
- Focus on smelters and refiners

EMRT

- **E**xtended **M**inerals **R**esponsible Template
- Voluntary RMI template for cobalt, mica and, in newer versions, lithium, nickel and natural graphite.
- Combines former CRT and MRT; aligns with IPC-1755.
- Increasingly used to support ESG and regulatory due diligence, including Battery Regulation.
- Mines can be reported. RMI's Eligible facilities lists for Extended Minerals are still evolving

AMRT

- The **A**dditional **M**inerals **R**eporting Template, formerly known as the Pilot Reporting Template (PRT)
- Voluntary, no specific regulation
- Launched on November 11, 2022
- User-defined – designed for “other minerals of concern”.
- Smelter-focused

Minerals tracked in AMRT may migrate into EMRT as RMI assesses industry priority, regulatory drivers and data maturity

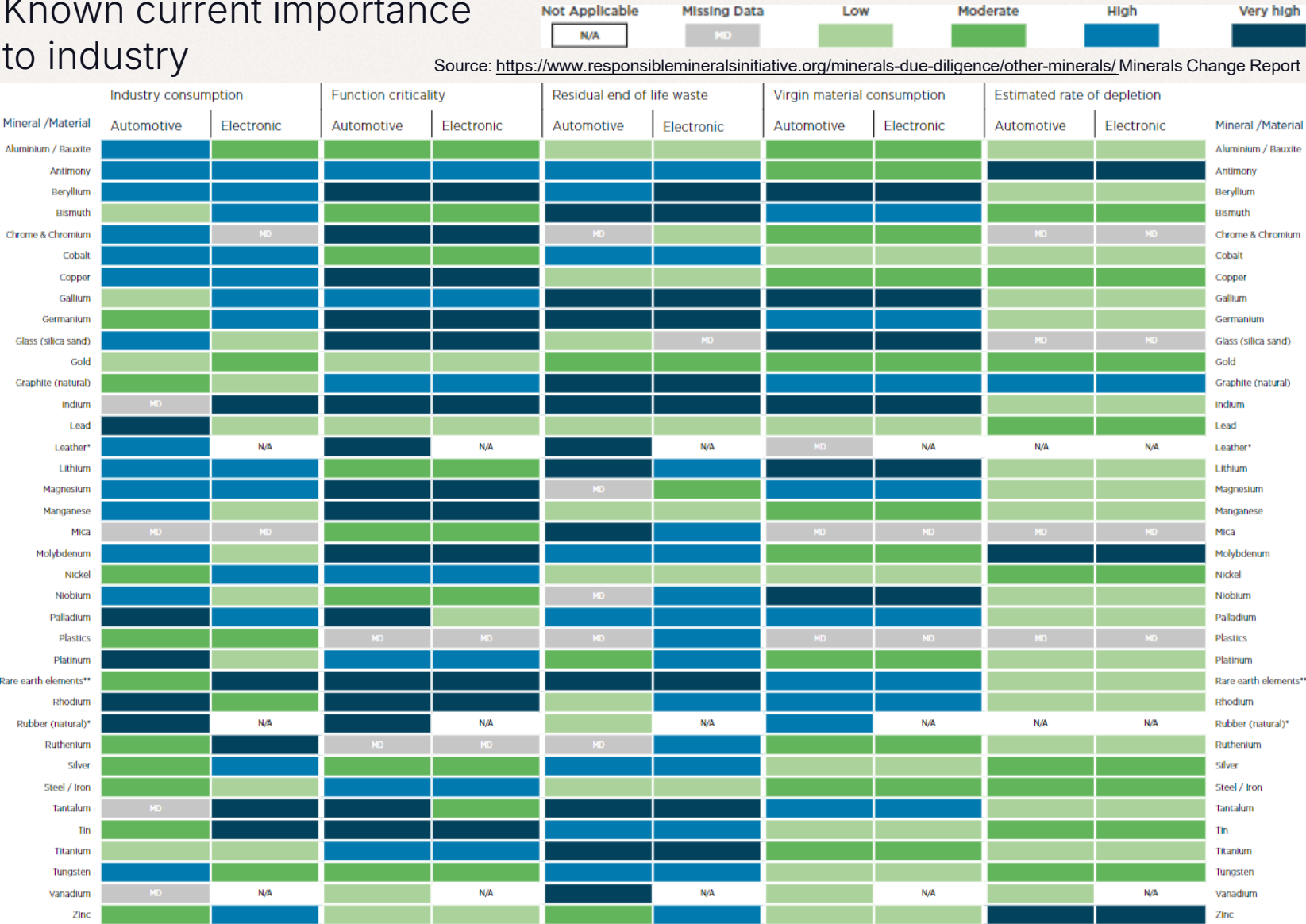


OTHER MATERIALS OF CONCERN

Minerals assessed as high priority are candidates for migration into EMRT.

1. Aluminum (Bauxite)	14. Leather	26. Rhodium
2. Antimony	15. Lithium	27. Ruthenium
3. Beryllium	16. Magnesium	28. Rubber (natural)
4. Bismuth	17. Manganese	29. Silica
5. Chrome & Chromium	18. Mica	30. Silver
6. Cobalt	19. Molybdenum	31. Steel / Iron
7. Copper	20. Nickel	32. Tantalum
8. Gallium	21. Niobium	33. Tin
9. Germanium	22. Palladium	34. Titanium
10. Gold	23. Platinum	35. Tungsten
11. Graphite (natural)	24. Plastics	36. Vanadium
12. Indium	25. Rare Earth Elements	37. Zinc
13. Lead		

Known current importance to industry



DUE DILIGENCE OBLIGATIONS

Mandating supply chain responsibility for critical raw materials, with legal enforcement from August 18, 2027.

Who Must Comply? Due diligence obligations apply to any economic operator placing batteries on the EU market, if its EU turnover exceeds €40 million. This applies to all battery types (EV, LMT, industrial, portable) – **not only those requiring a Digital Battery Passport.**



What is Required?

- **A Formal Sourcing Policy:** Companies must adopt and implement a formal policy for the responsible sourcing of critical raw materials.
- **Risk Management System:** This policy must be based on internationally recognized standards, such as the OECD Due Diligence Guidance. It requires companies to identify, prevent, and mitigate social and environmental risks in their supply chains.
- **Third-Party Verification:** Compliance with the due diligence policy must be verified by a notified body



Scope of the Regulation

Covered Raw Materials: The due diligence rules apply specifically to the supply chains of **cobalt, lithium, nickel, and natural graphite.**

Addressed Risks: The policy must address a wide range of risks, including:

- **Social & Human Rights:** Child labor, human rights abuses, and occupational health and safety.
- **Environmental:** Water use, air pollution, biodiversity, and soil protection.
- Full list of risk categories in **Annex X**

HOW EMRT SUPPORT BATTERY REGULATION COMPLIANCE

Turning regulatory obligations into actionable supply chain data



What EMRT provides

Structured Supply Chain Transparency

- EMRT provides template-based data on cobalt, lithium, nickel and natural graphite – covered by Battery Regulation
- Collects information on smelters, refiners and mines involved in the supply chain.
- Includes country of origin, facility identifiers & audit status (aligned with RMI's Responsible Minerals Assurance Process).
- Aligned with IPC-1755 and designed to support OECD Due Diligence Guidance.



How this meets Battery Regulation requirements

Meeting Due Diligence Expectations

- Provides evidence of formal sourcing policy implementation (supplier declarations via EMRT).
- Supports risk identification and assessment (smelter audit status, high-risk countries, ESG red flags).
- Enables third-party verification by notified bodies (auditable, structured datasets).
- Feeds directly into Digital Battery Passport data requirements for critical raw materials traceability.

Centralizing EMRT in CDX allows companies to collect once, use many times: Battery Regulation compliance, Digital Battery Passport data, CSRD reporting, customer inquiries and voluntary ESG commitments – all from the same validated dataset.

BEYOND BATTERY REGULATION - WHERE EMRT DATA ADDS VALUE

Many suppliers are below the legal thresholds of the Battery Regulation, CSRD or CSDDD, but they sit in the value chain of large OEMs who must comply – those OEMs increasingly expect EMRT-quality data and due diligence documentation from all their upstream partners.



CSRD and value chain reporting

EMRT and related minerals data support CSRD disclosures on value-chain impacts, resource use and risk management, especially for Scope 3 emissions and upstream social and environmental risks.

Most relevant ESRS: E5 (Resource use and circular economy), S2 (Workers in the value chain), and in some cases E3/E4 for environmental risks in mining and processing.



EU Taxonomy & sustainable finance

Reliable due diligence data on mineral origin, production practices and ESG risks help demonstrate that economic activities meet Taxonomy criteria, including “do no significant harm” and minimum social safeguards for mining and manufacturing



Corporate Sustainability Due Diligence Directive (CSDDD)

Structured EMRT and AMRT data strengthen the evidence base for human-rights and environmental due diligence across mineral supply chains, in line with OECD Guidance and emerging CSDDD requirements

GLOBAL TRENDS IN RESPONSIBLE BATTERY SOURCING



China NEV Battery Traceability & Recycling Rules

- China's Interim Measures create national traceability and recycling system for NEV power batteries; manufacturers must register packs and assume end-of-life responsibility.
- Batteries carry standardized codes and are reported into central government platform, tracking from production through recycling.
- China treats battery materials as strategic assets.



US National Defense Authorization Act (NDAA 2026)

- Introduces "de-risk or de-list" mandate for advanced batteries in US defense and critical infrastructure programs.
- New acquisitions must prove 95% of functional cell component costs (cathodes, anodes, electrolytes) come from non-Foreign Entity of Concern sources (FEOC).
- Hard compliance gate: batteries with FEOC components cannot be procured.
- Demonstrating compliance requires granular, auditable minerals origin data – exactly what EMRT and CDX deliver.



EU Critical Raw Materials Act (CRMA)

- Establishes framework to secure reliable access to strategic raw materials for Europe's clean-tech transition.
- Large companies must map supply chains to extraction site and identify risks like over-reliance on single country.
- For battery minerals (Co, Li, Ni, graphite), EMRT smelter data provides exactly the granularity these audits require.
- Extended Minerals reporting becomes natural input into CRMA compliance.

BUILDING YOUR DUE DILIGENCE PROGRAM

The path from no program to a fully audit-ready due diligence program involves more steps, and more time, than most companies initially estimate

1

Identify Your Scope: Establish batteries and business units in scope, turnover thresholds, and supply chain role obligations.

2

Map Your Supply Chain: Trace cobalt, lithium, nickel and graphite to smelter and mine level. Most labour-intensive phase.

3

Develop Policy: Publish OECD-aligned responsible sourcing policy covering all four critical materials and Annex X risks.

4

Build EMRT Data Collection: Send structured data requests to tier-1 suppliers with validation and follow-up processes.

5

Central Data System: Implement platform like CDX for workflow management, quality checks and audit-ready evidence trails.

6

Conduct Risk Assessment: Assess smelters, refiners and origin countries against Annex X criteria. Document mitigation for high-risk nodes.

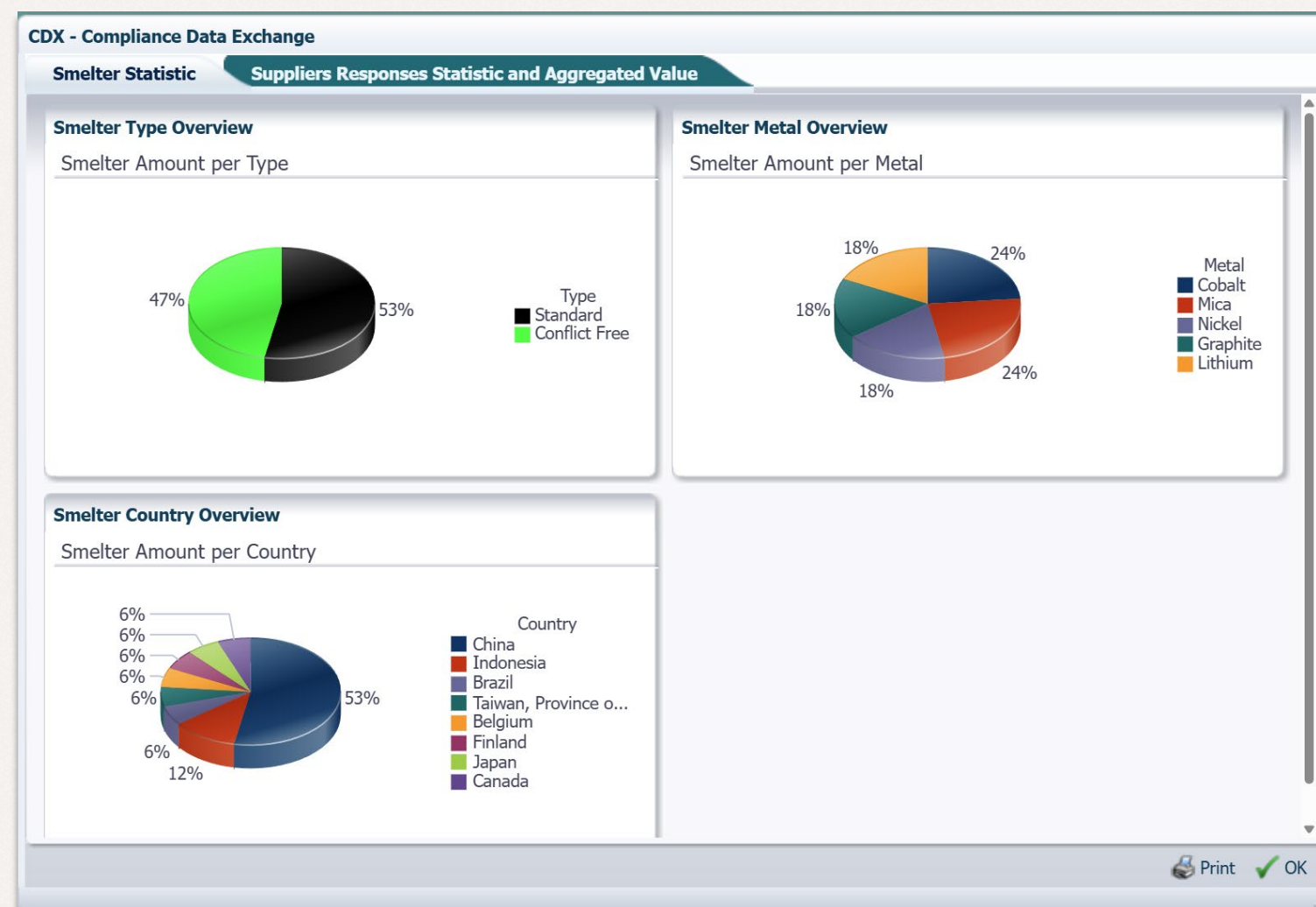
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Build Evidence Base: Maintain timestamped documentation of all requests, declarations and findings for notified body verification.

CDX - FROM EMRT FILES TO ACTIONABLE DUE DILIGENCE DATA

Challenges in tracking Critical Mineral Origins

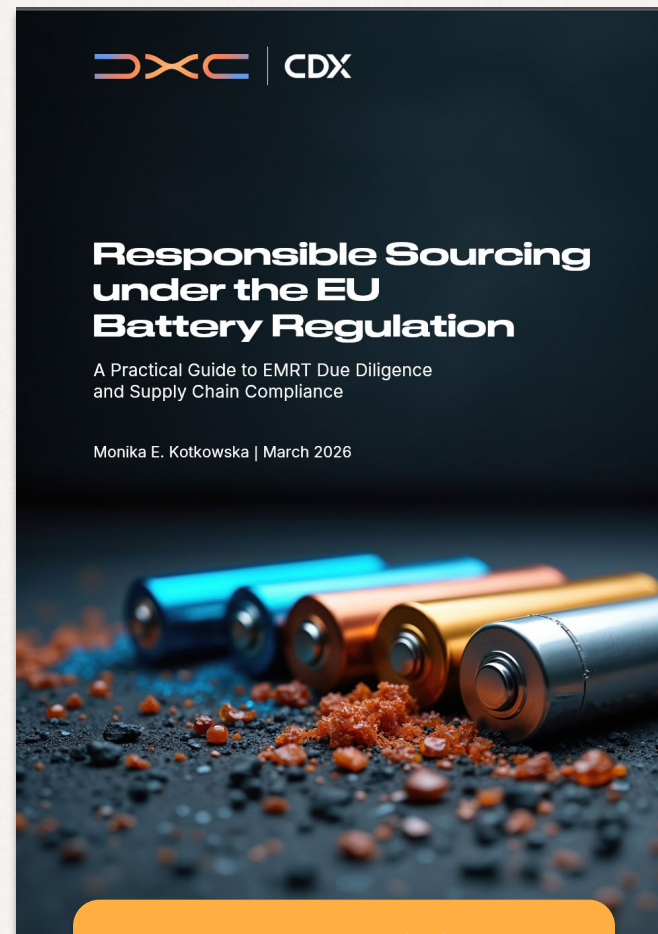
- **Centralised EMRT Management:** Import and manage supplier EMRT declarations in one workspace with automated validation.
- **RMI Conformant Facility Mapping:** Automatic mapping against RMAP audit lists to identify conformant and non-conformant smelters.
- **Annex X Risk Assessment:** Structured risk assessment across all four critical raw materials with CAHRA identification.
- **Audit-Ready Evidence Trail:** Timestamped, version-controlled records for notified body verification.
- **Multi-Framework Data Reuse:** Collect once, use for Battery Regulation, CSRD (ESRS E5/S2), CSDDD and customer requests.



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