

Conflict Minerals Reporting Template (CMRT)

COMPLETION GUIDE

Revision 4.01b



An initiative of the EICC and GeSI

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November 16, 2015



An initiative of the EICC and GeSI

The Conflict Minerals Reporting Template (Template) is a free, standardized reporting template created by the Electronic Industry Citizenship Coalition® (EICC®) and the Global e-Sustainability Initiative (GeSI). The Template facilitates the transfer of information through the supply chain regarding mineral country of origin and smelters and refiners being utilized and supports compliance to legislation*. The template also facilitates the identification of new smelters and refiners to potentially undergo an audit via the Conflict-Free Smelter Program.**

* In 2010, the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act was passed concerning "conflict minerals" originating from the Democratic Republic of the Congo (DRC) or adjoining countries. The SEC published final rules associated with the disclosure of the source of conflict minerals by U.S. publicly traded companies (see the rules at <http://www.sec.gov/rules/final/2012/34-67716.pdf>). The rules reference the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, (<http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf>), which guides suppliers to establish policies, due diligence frameworks and management systems.

** See information on the Conflict-Free Sourcing Initiative (www.conflictfreesourcing.org).

INTRODUCTION

IPC-1755 Conflict Minerals Data Exchange Standard establishes the requirements for exchanging conflict minerals data between suppliers and their customers. To meet the needs of a broad range of users, this standard provides flexibility in the scope of the products covered within a single declaration. This standard applies to business-to-business transactions. It is not intended to be used by the general public when making intended purchasing decisions. This standard is not a compliance guide. This standard is intended to benefit suppliers and their customers by providing consistency and efficiency to the conflict minerals due diligence data exchange declaration process. It establishes standard electronic data exchange formats that will facilitate and improve data transfer along the entire global supply chain.

The Conflict-Free Sourcing Initiative (CFSI) is a membership organization consisting of more than 200 companies from seven industries. This group contributes to a range of tools and resources, including the Conflict-Free Smelter Program, the Conflict Minerals Reporting Template, Reasonable Country of Origin Inquiry Data and guidance documents on conflict minerals sourcing. The CFSI also runs regular workshops on conflict minerals issues and contributes to policy development and debates with leading civil society organizations and governments. CFSI receives all of its funding from member companies and does not receive government funding.

This survey's original purpose cannot be met if the survey does not reach smelters. The smelter name column should be firstly completed by smelters. Downstream companies other than smelters need to transcribe smelter names from suppliers' survey results instead of completing the column with assumption or presumption.

This guide was a collaborative effort by members of CFSI, JEITA and AIAG.

TEMPLATE STRUCTURE

Revision	Instructions	Definitions	Declaration	Smelter List	Checker	Product List	Smelter Reference List
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The CMRT contains eight (8) sheets, some of which provide supplemental information for completing the template, others require user input. Sheets requiring user input are highlighted in green (Declaration, Smelter List, Product List).

Revision sheet: additional information about past revisions of the CMRT including description of functional change and updates to the smelter list

Instructions sheet: additional information about completing the CMRT

Definitions sheet: additional information about completing the CMRT

Declaration sheet: mandatory questions and company information (required)

Smelter List sheet: list of all smelters/refiners of 3TG in your supply chain as identified by your direct suppliers (required)

Checker sheet: verification list to confirm your completion of all requirements within the CMRT

Product List sheet: If reporting at the Product level, you must complete this list with all in-scope parts

Smelter Reference List sheet: list of all identified smelters/refiners of 3TG as verified by the Conflict-Free Sourcing Initiative (CFSI) – you may use this list as a reference in identifying actual smelters and refiners submitted by your direct suppliers and to confirm the information provided before submitting to your customer

TEMPLATE FUNCTIONALITY

SELECT LANGUAGE PREFERENCE

Before beginning completion of the CMRT, it may be useful to convert the template into your preferred language using the drop down.

If your customer requires the form to be submitted in English, you may change the language preference back to English once completed.

Select Language Preference Here:

请选择你的语言:

사용할 언어를 선택하시오:

表示言語をここから選択してください:

Selectionner la langue préférée ici:

Seleccione Preferencia de idioma Aquí:

Wählen sie hier die Sprache:

Seleccione el lenguaje de preferencia aquí:

Selezionare la lingua di preferenza qui:

ent is to collect sourcing information on the following questions 1 - 7 based on the declaration scope indicated above.

1). The information collected in this template is to collect sourcing information on the following questions 1 - 7 based on the declaration scope indicated above.

From the dropdown choose a response of "Yes" or "No"

从下拉列表中选择"是"或"不是"

ドロップダウンメニューから「Yes (はい)」又は「No (いいえ)」を選択してください

Yes = 예, No = 아니오

Selectionner "Yes" (Oui) ou "No" (Non) dans la liste déroulante

A partir da lista selecione a resposta: "Sim" ou "Não".

Wählen Sie aus der Drop-down Liste eine Antwort: "Ja" oder "Nein"

De las opciones elija la respuesta "Sí" o "No"

Dalle presenti liste, scegliete la risposta: "Sí" o "No"

English

English
中文 Chinese
日本語 Japanese
한국어 Korean
Français
Português

Embedded instructions for each question in all available languages.

the following questions 1 - 7 based on the declaration scope indicated above.

From the dropdown choose a response of "Yes" or "No"

From the dropdown choose a response of "Yes" or "No"

From the dropdown choose a response of "Yes" or "No"

From the dropdown choose a response of "Yes" or "No"

From the dropdown choose a response of "Yes" or "No"

From the dropdown choose a response of "Yes" or "No"

From the dropdown choose a response of "Yes" or "No"

If 1) and 2) of the Due Diligence questions are answered 'No' for any metal, the remaining Due Diligence questions will be disabled as they are no longer applicable.

1) Is the 3TG intentionally added to your product? (*)

Tantalum (*)	Answer
Tin (*)	No
Gold (*)	No
Tungsten (*)	Yes

2) Is the 3TG necessary to the production of your company's products and contained in the finished product that your company manufactures or contracts to manufacture? (*)

Tantalum (*)	Answer
Tin (*)	No
Gold (*)	Yes
Tungsten (*)	Yes

3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (*)

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

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

Tantalum	Answer
Tin	
Gold (*)	
Tungsten (*)	

COMPANY INFORMATION

Mandatory fields are noted with an asterisk (*). The information collected in this template should be updated annually. Any changes within the annual cycle should be provided to your customers. Provide comments in English only.

QUESTIONS (ROWS 8 – 22)

Company Name (*): Insert your company's legal name. Please do not use abbreviations.

Declaration Scope or Class (*): Select your company's declaration scope. The options for scope are:

A. Company

For "Company", the declaration encompasses the entirety of a company's products or product substances produced by the parent company. Therefore if the user is reporting 3TG data at the company level, they will be reporting conflict minerals data on all products they manufacture.

B. Product (or List of Products)

For Scope selection of "Product (or List of Products)", a link to the worksheet tab for Product List will be displayed. If this scope is chosen, it is mandatory to list the Manufacturer's Product Number of the products covered under the Scope of this Declaration in Column B of the Product List worksheet. It is optional to list the Manufacturer's Product Name in Column C of the Product List worksheet.

C. User-Defined

For Scope selection of "User Defined", it is mandatory that the user describes the scope to which the 3TG disclosure is applicable. The scope of this class shall be defined in a text field by the supplier and should be easily understood by customers or the receivers of the document. As an example, companies may provide a link to clarifying information.

Company Unique ID: Insert your company's unique identifier number or code (DUNS number, VAT number, customer-specific identifier, etc.). This field is optional.

Company Unique ID Authority: Insert the source for the unique identifier number or code ("DUNS", "VAT", "Customer", etc.). This field is optional.

Address: Insert your full company address (street, city, state, country, postal code). This field is optional.

Contact Name (*): Insert the name of the person to contact regarding the contents of the declaration information. This field is mandatory.

Email - Contact (*): Insert the email address of the contact person. If an email address is not available, state "not available" or "n/a." A blank field may cause an error in form implementation. This field is mandatory.

Phone - Contact (*): Insert the telephone number for the contact. This field is mandatory.

Authorizer (*): Insert the name of the person who is responsible for the contents of the declaration information. The authorizer may be a different individual than the contact person. It is not correct to use the words "same" or similar identification to provide the name of the authorizer. This field is mandatory.

Title - Authorizer: Insert the title for the authorizing person. This field is optional.

Email - Authorizer (*): Insert the email address of the authorizing person. If an email address is not available, state "not available" or "n/a." A blank field may cause an error in form implementation. This field is mandatory.

Phone - Authorizer (*): Insert the telephone number for the authorizing person. This field is mandatory.

Effective Date (*): Please enter the date of completion for this form using the format DD-MMM-YYYY. This field is mandatory.

Note: If your company forwards your suppliers' Declaration Sheets to your customer company, it is recommended that your company take precautions such as obtaining your suppliers' permission because sharing personal contact information in the Declaration sheet may violate laws protecting personal information in a country where such laws exist."

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 (*):	

DUE DILIGENCE QUESTIONS (ROWS 24-65)

These seven questions define the usage, origination and sourcing identification for each of the metals. The questions are designed to collect information about the use of 3TG in the company's product(s) to allow for the determination of regulatory applicability. Responses to these questions shall represent the 'Declaration Scope' selected in the company information section. The responses to the questions in this section can be used to determine applicability and completeness of 3TG reporting.

For each of the seven required questions, provide an answer for each metal using the pull down menu selections. The questions in this section must be completed for all 3TG. If the response for a given metal to questions 1 and/or question 2 is positive, then the subsequent questions shall be completed for that metal and the following due diligence questions (A to J) shall be completed about the company's overall due diligence program.

1 IS THE 3TG INTENTIONALLY ADDED TO YOUR PRODUCT? (*)

This is the first of two questions for which the response is used to determine whether the 3TG is within the scope of conflict minerals reporting requirements. This question relies upon the guidance provided by the SEC in the final rules regarding the determination if a 3TG is "necessary to the functionality" of a product. The SEC guidance is based upon the presumption that a company in the supply chain for a product would not intentionally add a 3TG to that product or any of a product's sub-components if that 3TG was not necessary to the product's generally expected function, use, or purpose. This response to this question serves to exclude any trace level contaminants such as tin in steel.

This question asks if any of conflict minerals are used as raw material, component or additive in a product that you manufacture or contract to manufacture (including raw material and component). Impurities in raw material, component or additive, and abrasive and cutting tool for equipment are outside the scope of the survey.

25	1) Is the 3TG intentionally added to your product? (*)	Answer	Comments
26	Tantalum (*)	Yes	
27	Tin (*)	No	
28	Gold (*)		
29	Tungsten (*)		

Answer Options:

Yes: Select if the use of 3TG is intentional in terms of product specification and for functionality purposes. A "Yes" answer to this question for any metal will prompt you to list your applicable smelters on the Smelter List tab.

Examples:

- Capacitor using tantalum
- Product assembled with component using alloy of gold or tungsten
- Tin used as additive in paint or synthetic resin
- Stannane (i.e. tin) used as coating agent for glass
- Tungsten used as additive in manufacture of long steel

No: Select if the use of 3TG is unintentional

Examples:

- Naturally occurring tin in bauxite used to produce aluminum
- Trace amounts of tin that may be found in recycled steel

Caution: Before you answer "No" to any metal in Question 1, consider the following: You must report if there is any amount of 3TG (including .000001%) intentionally used in your product. There is no "de minimis" amount of material under the rule.

Caution: Understand that if any of these metals are intentionally added anywhere within your supply chain, they are considered intentionally added to your product.

Note: Some companies may require substantiation for a "No" answer, which should be entered into the Comments Field.

2

IS THE 3TG NECESSARY TO THE PRODUCTION OF YOUR COMPANY'S PRODUCTS AND CONTAINED IN THE FINISHED PRODUCT THAT YOUR COMPANY MANUFACTURES OR CONTRACTS TO MANUFACTURE? (*)

This is the second of two questions for which the response is used to determine whether the 3TG is within the scope of conflict minerals reporting requirements as described in the SEC's final rules regarding the determination if a 3TG is "necessary to the production" of a product. This question is separate and independent from the question and response to question 1. This query is intended to identify 3TGs which are intentionally used in the manufacturing process of a product and where some amount of the 3TG remains in the finished product. These 3TGs likely were not intended to become part of the final product nor are they likely "necessary to the functionality" of the product but are only present as residuals of the manufacturing process. In many cases, the manufacturer may have attempted to remove or facilitate consumption of the 3TG during the manufacturing process, however, some amount of the 3TG remains. Should the 3TG, which is used during the manufacturing process, be completely removed during that process, the response to this question would be "no".

31	2) Is the 3TG necessary to the production of your company's products and contained in the finished product that your company manufactures or contracts to manufacture? (*)	Answer	Comments
32	Tantalum (*)	Yes	
33	Tin (*)	No	
34	Gold (*)		
35	Tungsten (*)		

Answer Options:

Yes: Select if the 3TG is not necessary for product specification or functionality, but is necessary for the production process and contained in the finished product you manufacture or contract to manufacture. A "Yes" answer to this question for any metal will prompt you to list your applicable smelters on the Smelter List tab.

Examples:

- Stannin (i.e. tin) used as catalyst, which is not completely removed from the product
- Chemical compound of tantalum used as welding rod, where some tantalum still remains in the product
- Residual tin left after process of "float glass"

No: Select if the 3TG is necessary for the production but not contained in finished product

Examples:

- Tungsten carbide blade or drill bit is used in the manufacture, but no tungsten remains in the finished product

Caution: Before you answer "No" to any metal in Question 2, consider the following: If 3TG is necessary to the production anywhere in the supply chain, and remains in the finished product, it is considered "necessary." If either part of the sentence can be answered "No," then Question 2 can be answered "No."

Note: It is possible to have a "Yes" answer to Question 1 and a "No" answer to Question 2. For example, tantalum used in a tantalum oxide capacitor would normally yield this answer combination.

3

DO ANY OF THE SMELTERS IN YOUR SUPPLY CHAIN SOURCE THE 3TG FROM THE COVERED COUNTRIES? (*)

This is a declaration that any portion of the 3TGs contained in a product or multiple products originates from the DRC or an adjoining country (covered countries).

37	3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (*)	Answer	Comments
38	Tantalum (*)		
39	Tin (*)		
40	Gold (*)		
41	Tungsten (*)		

Answer Options:

Yes: Select if any of the 3TG originates from DRC and adjoining countries*

Examples:

- A smelter listed in the CFSI RCOI report (only available to CFSI members) indicates the country of origin is “L3” and / or “DRC”
- A smelter publicly discloses they source from the region

No: Select if none of the 3TG originates from DRC and adjoining countries

Examples:

- All smelters are listed in the CFSI RCOI report (only available to CFSI members) and the country of origin is “L1” for all of them
- Through due diligence, the company has determined that all smelters source 100% recycled scrap

Unknown: Select if origin of any of the 3TG is unknown

Example: If any smelters’ sourcing is unconfirmed or undisclosed, it is unknown

Caution: The location of the smelter / refiner does not determine the source of the 3TG. While some smelters / refiners do source locally, many import 3TGs from other countries.

Example: A smelter / refiner located in Canada may be sourcing minerals from the DRC or surrounding countries

Note: If you answer “Yes,” please enter the name of the covered country in Column 0 of CMRT Smelter list or write smelter names and corresponding covered country of origin in the comment column of Question 3.

Note: If you answer “No” to any 3TG in Question 3, be aware that further information may be required in order for this response to be considered complete by your customers. Acceptable evidence may include:

- Submissions from 100% of your relevant suppliers that provide products which include 3TG, including their complete smelter lists (per Question 5 response); AND
- Questions 6 and 7 can be answered “Yes;” AND
- For all smelters of 3TG complete – to the best of your knowledge – the identified “Location (Country) of Mine(s)” on your smelter list (Column 0)

Note: Many companies find it **acceptable** to answer “Yes” to this question. If you answer “Yes” to any 3TG in Question 3, you are encouraged to identify the smelter that purchased the minerals by adding the “Location (Country) of Mine(s)” on your smelter list (Democratic Republic of Congo, Congo Republic, Central Africa Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia, or Angola).

4

DOES 100 PERCENT OF THE 3TG (NECESSARY TO THE FUNCTIONALITY OR PRODUCTION OF YOUR PRODUCTS) ORIGINATE FROM RECYCLED OR SCRAP SOURCES? (*)

This is a declaration that identifies whether 3TGs contained in the product(s) necessary to the functionality of that product(s) originate from recycled or scrap sources.

Answer Options:

Yes: Select if 100% of the 3TG comes from recycled or scrap sources

Example: You purchase from a gold refiner that does exclusively 100% scrap processing. In order to answer "Yes" for gold in Question 4, ALL of the gold refiners on your smelter list must be sourcing from recycled or scrap sources exclusively

No: Select if some of the 3TG does not come from recycled or scrap sources

Example: You purchase materials from a refiner which has mixed sources of materials, including some non-secondary materials (also known as 'mined materials')

Unknown: Select if the user does not know whether or not 100% of the 3TG comes from recycled or scrap sources

Example: You purchase from a smelter or refiner but do not have information about sourcing practices

Caution: If you know that any of your products contain 3TG that is not from scrap or recycled sources, respond "No."

Note: Some companies may require substantiation for a “Yes” answer, which should be entered into the Comments Field. Information validating 100% recycled or scrap sourcing has been collected by the Conflict-Free Sourcing Initiative for validated smelters and refiners and we encourage membership to support the ongoing validation of such sourcing

5

HAVE YOU RECEIVED DATA/INFORMATION FOR EACH 3TG FROM ALL RELEVANT SUPPLIERS? (*)

This is a declaration to determine whether a company has received conflict minerals disclosures from all direct suppliers reasonably believed to be providing 3TGs contained in the products covered by the scope of this declaration.

Relevant suppliers: The objective of conducting a supply chain survey is to generate an accurate representation of the sourcing conditions in the supply chain in order to understand and act upon identified risks. Generally, companies should define their universe of relevant suppliers in a manner which addresses the accepted tolerance for compliance of their stakeholders. Companies commonly define “relevant suppliers” as: 1) all suppliers that use 3TG in the parts that they provide to your company; or 2) suppliers of a particular commodity known to contain 3TG.

5) Have you received data/information for each 3TG from all relevant suppliers? (*)		Answer	Comments
49	Tantalum (*)		
50	Tin (*)	Yes, 100%	
51	Gold (*)	No, but greater than 75%	
52		No, but greater than 50%	
53	Tungsten (*)	No, but greater than 25%	
54		No, but less than 25%	
		None	

Answer Options:

Yes, 100%: Select if, to the best of your knowledge, all suppliers have reported

No, but greater than 75%

No, but greater than 50%

No, but greater than 25%

No, but less than 25%

None

***For all “No” answers: please explain the reason for this answer, such as supplier refusal to report, unsure of all suppliers, or other**

Caution: If you respond “Yes, 100%” for any metal in Question 5, you are expected to provide the names of all smelters that process that metal(s) used in your supply chain in order for this answer to be complete.

Note: Some companies may require substantiation for how you have defined “relevant” suppliers, which should be entered into the Comments Field. If you have not achieved a 100% response rate from your relevant suppliers, please submit your CMRT indicating the appropriate percentage and continue to survey your suppliers. An increase in your company’s percentage of suppliers surveyed may be one indication of year-over-year improvement.

6

HAVE YOU IDENTIFIED ALL OF THE SMELTERS SUPPLYING THE 3TG TO YOUR SUPPLY CHAIN? (*)

This question verifies if you have reason to believe that you have identified all of the currently-known smelters providing 3TGs in the products covered by this declaration.

55	6) Have you identified all of the smelters supplying the 3TG to your supply chain? (*)	Answer	Comments
56	Tantalum (*)	Yes	
57	Tin (*)	No	
58	Gold (*)		
59	Tungsten (*)		
60			

Answer Options:

Yes: Select if you have identified all of the smelters supplying 3TG in your supply chain

Examples:

- You have 100% response rate to smelter survey, per question 5
- You have received almost all of the responses, and based on commodity representation of your supply chain, you are confident that all known smelters have been identified

No: Select if you have NOT identified all of the smelters supplying 3TG in your supply chain

Example: You are waiting for additional supplier responses and you believe they may contain new smelters

Caution: Some companies may require substantiation if you answer less than 100% to Question 5, and then "Yes" to this question, which should be entered into the Comments Field.

7

HAS ALL APPLICABLE SMELTER INFORMATION RECEIVED BY YOUR COMPANY BEEN REPORTED IN THIS DECLARATION? (*)

This question verifies that all of the smelters identified to be providing any of the 3TGs contained in the products covered by the scope of this declaration have been reported in this declaration.

61	7) Has all applicable smelter information received by your company been reported in this declaration? (*)	Answer	Comments
62		Tantalum (*)	
63		Tin (*)	
64		Gold (*)	
65		Tungsten (*)	
66		Yes	
		No	

Answer Options:

Yes: Select if all applicable smelter information you receive is reported

Example: You have reviewed all information received from your suppliers, consolidated aliases, and included entities verified as “smelters” by some authority (such as CFSI) or as a result of due diligence you conduct and are including that information in this report

No: Select if all applicable smelter information you received is NOT reported

Example: There is a legitimate business reason why you cannot provide this information in the report

Caution: Some companies may require substantiation for a “No” answer, which should be entered into the Comments Field.

Good Practice: Report all known smelters. If you have confidentiality concerns, consider reporting further downstream.

QUESTIONS A – J (ROWS 69 – 87)

The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-affected and High-risk Areas (OECD Guidance) defines “Due Diligence” as “an on-going, proactive and reactive process through which companies can ensure that they respect human rights and do not contribute to conflict.” Due diligence should be an integral part of your company’s overall conflict free sourcing strategy. Questions A. thru J. are designed to assess your company’s conflict-free minerals sourcing due diligence activities. Responses to these questions shall represent the full scope of your company’s activities and shall not be limited to the ‘Declaration Scope’ selected in the company information section.

A DO YOU HAVE A POLICY IN PLACE THAT ADDRESSES CONFLICT MINERALS SOURCING? (*)

SEC filers should have a conflict minerals policy in place. Some customers may require that your company have a conflict minerals policy in place, regardless of your company’s SEC filing status.

A. Do you have a policy in place that addresses conflict minerals sourcing? (*)

Answer Options:

Yes: Select if your company has a conflict minerals policy in place.

No: Select if your company does not yet have a conflict minerals policy in place.

B IS YOUR CONFLICT MINERALS SOURCING POLICY PUBLICLY AVAILABLE ON YOUR WEBSITE? (NOTE – IF YES, THE USER SHALL SPECIFY THE URL IN THE COMMENT FIELD.) (*)

SEC filers should have a policy available on their company’s website. Some customers may require that your company have a conflict minerals policy available for their review, regardless of your company’s SEC filing status.

B. Is your conflict minerals sourcing policy publicly available on your website? (Note – If yes, the user shall specify the URL in the comment field.) (*)

Answer Options:

Yes: Select if your company’s conflict minerals sourcing policy is publicly available on your website.

No: Select if your company has a policy that is not publicly available on your website.

Note: Remember to provide a **direct** link to the policy in the comments section for “Yes” answers

C DO YOU REQUIRE YOUR DIRECT SUPPLIERS TO BE DRC CONFLICT-FREE? (*)

In the SEC Rule, products are considered DRC conflict free if they do not contain minerals that directly or indirectly finance or benefit armed groups in the Covered Countries. Some customers may require that your company has a conflict-free sourcing policy.

DRC Conflict Free: Products that do not contain minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or an adjoining country. Source: 2010 United States legislation, Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502 (<http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf>)

C. Do you require your direct suppliers to be DRC conflict-free? (*)

Answer Options:

Yes: Select if your company requires your direct suppliers to be DRC conflict-free.

No: Select if your company does not have such a requirement for direct suppliers.

Caution: DRC Conflict-free SORs can still source from the Democratic Republic of the Congo or an adjoining country.

D 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? (*)

This is a declaration to determine whether a company requires their direct suppliers to source 3TG from validated, conflict free smelters.

This question applies to both smelters and refiners. An example of a third-party audit program is the CFSI's Conflict Free Sourcing Program.

D. 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? (*)

Answer Options:

Yes: Select if your company requires your direct suppliers to source from SORs who have been validated by CFSI or other independent third party audit programs.

Examples: Other independent third party audit programs may include:

- The Responsible Jewelry Council (RJC)
- London Bullion Market Association (LBMA)

No: Select if your company allows suppliers to source from non-validated SORs.

Caution: Some of your customers may require that you source from SORs who have been validated by an independent third party audit program.

E HAVE YOU IMPLEMENTED DUE DILIGENCE MEASURES FOR CONFLICT-FREE SOURCING? (*)

This declaration is not intended to provide the details of a company's due diligence measures - just that a company has implemented due diligence measures. The aspects of acceptable due diligence measures shall be determined by the requestor and supplier.

E. Have you implemented due diligence measures for conflict-free sourcing? (*)

Answer Options:

Yes: Select if your company has implemented due diligence measures for conflict free sourcing.

Examples: These due diligence measure examples are consistent with the guidelines included in the internationally recognized [OECD Guidance](#).

- Communicating and incorporating into contracts (where possible) your expectations to suppliers on conflict-free mineral supply chain
- Identifying and assessing risks in the supply chain
- Designing and implementing a strategy to respond to identified risks; verifying your direct supplier's compliance to its DRC conflict-free policy
- For more examples, please see the CFSI white paper, "[Five Practical Steps to Support SEC Conflict Minerals Disclosure](#)"

No: Select if your company does not engage in due diligence measures for conflict free sourcing.

Due diligence: Refers to continual, voluntary and situation-based processes used by a company to respect human rights and ensure it does not contribute to conflict.

F DO YOU COLLECT CONFLICT MINERALS DUE DILIGENCE INFORMATION FROM YOUR SUPPLIERS WHICH IS IN CONFORMANCE WITH THE IPC-1755 CONFLICT MINERALS DATA EXCHANGE STANDARD [E.G., THE CFSI CONFLICT MINERALS REPORTING TEMPLATE]? (*)

This is a declaration to disclose whether a company requests their supplier to fill out a conflict minerals declaration.

The IPC-1755 is a centrally controlled data exchange standard used by multiple industries who are tasked with collecting conflict minerals information. CMRT is in conformance with the IPC-1755 standard.

F. Do you collect conflict minerals due diligence information from your suppliers which is in conformance with the IPC-1755 Conflict Minerals Data Exchange standard [e.g., the CFSI Conflict Minerals Reporting Template]? (*)

Answer Options:

Yes: Select if your company requests your suppliers to fill out a conflict minerals declaration

Example: You request your suppliers use the CMRT

No: Select if your company does not collect conflict minerals due diligence information from your suppliers, or you use a different format to collect this information.

Note: Provide a comment in certain cases, i.e., to provide the format used for collecting information.

G

DO YOU REQUEST SMELTER NAMES FROM YOUR SUPPLIERS? (*)

This question refers to both smelters and refiners. This answer helps your customer determine how your company obtained the smelter or refiner data reported in your CMRT.

G. Do you request smelter names from your suppliers? (*)

Answer Options:

Yes: Select if your company requests smelter names from your suppliers.

No: Select if your company does not request smelter names from your suppliers.

Note: If you answer "Yes," be sure to include the smelter list.

H

DO YOU REVIEW DUE DILIGENCE INFORMATION RECEIVED FROM YOUR SUPPLIERS AGAINST YOUR COMPANY'S EXPECTATIONS? (*)

This question refers to the level of evaluation your company performs on its incoming supplier data against your company's established criteria. See question E for examples of due diligence measures.

Answer Options:

Yes: You have a process to review due diligence information received from your suppliers

Examples:

- You evaluate each smelters' risk for conflict sourcing
- Your company expects that each supplier has a conflict-free sourcing policy and you review whether or not they do
- You review your suppliers' information for accuracy and completeness (e.g. review and compare suppliers' documentation)

No: You do not review due diligence information received from your suppliers

Caution: Simply copying information sent from suppliers and sending to customers without review does not constitute due diligence.

Note: In the comments section, you can provide additional information on your approach. Examples could be:

- "Documentation review only" – a review of supplier submitted records and documentation conducted by independent third parties and, or your company personnel.
- "Internal audit" – on-site audits of your suppliers conducted by your company personnel.
- "3rd party audit" – on-site audits of your suppliers conducted by independent third parties.

I DOES YOUR REVIEW PROCESS INCLUDE CORRECTIVE ACTION MANAGEMENT? (*)

This question refers to your company's escalation or action plan to address incomplete or inconsistent data, non-responsive suppliers, or actors in your supply chain found to be not sourcing responsibly.

I. Does your review process include corrective action management? (*)

Answer Options:

Yes: Select if you have a process to manage corrective actions

Examples:

- If a supplier does not have a conflict-free sourcing policy, your company may ask them to create one and initiate a conflict-free mineral program
- You follow up on identified risks per your company's due diligence program

No: Select if you have no process in place to manage corrective actions

Note: Describe how you manage your corrective action process.

J ARE YOU SUBJECT TO THE SEC CONFLICT MINERALS RULE? (*)

This question refers to whether or not you manufacture or contract to manufacture products that contain 3TG and are required to file Form SD and a conflict minerals report with the U.S. Securities and Exchange Commission (SEC). The SEC conflict minerals disclosure requirements apply to US exchange-traded companies that are subject to the US Securities Exchange Act. For more information please refer to www.sec.gov

J. Are you subject to the SEC Conflict Minerals rule? (*)

Answer Options:

Yes: Select if you are a US-exchange traded company subject to the US Securities Exchange Act (see www.sec.gov)

No: Select if you are a privately held company or otherwise not subject to the US Securities Exchange Act

Caution: If you are unsure of your status, seek advice from legal counsel.

SMELTER LIST TAB

If you select product level scope on the declaration it will prompt you to reference part numbers here. This template allows for smelter identification using the Smelter Reference List. Columns B, C, D and E must be completed in order from left to right to utilize the Smelter Reference List feature.
Use a separate line for each metal/smelter/country combination.

INDIVIDUAL SMELTER ENTRY INSTRUCTIONS:

1. Metal (*)

Use the pull down menu to select the metal for which you are entering smelter information. This field is mandatory.

	Metal (*)	Smelter Reference List (*)	Smelter Name (*)	Smelter Country (*)	Smelter Identification	Source of Smelter Identification Number
4						
5		Tantalum				
6		Tin				
7		Tungsten				
8		Gold				
9						

2. Smelter Reference List(*)

Select from dropdown. This is the list of known smelters as of template release date.

If you select any known smelter from the list, Smelter Name (*), Smelter Country (*), Smelter Identification, Source of Smelter Identification, Smelter City and Smelter Facility Location: State / Province will auto-populate.

If smelter is not listed, select 'Smelter Not Listed'. This will allow you to enter the name of the smelter in Column D. This field is mandatory. Wrong combination will trigger **RED** color.

	Metal (*)	Smelter Reference List (*)	Smelter Name (*)	Smelter Country (*)	Smelter Identification	Source of Smelter Identification Number
4						
5	Tin	ABC Corporation				
6						
7						
8						
9						

3. Smelter Name (*)

Fill in smelter name if you selected "Smelter Not Listed" in column C. This field will auto-populate when a smelter name is selected in Column C. This field is mandatory. Enter all available smelter information in columns H through P.

- Whenever possible completion of column O "Location (Country) or Mine(s) or if recycled or scrap sourced, entered "recycled" or "scrap"" is recommended

	Metal (*)	Smelter Reference List (*)	Smelter Name (*)	Smelter Country (*)	Smelter Identification	Source of Smelter Identification Number
4						
5	Tin	Smelter not listed	ABC Corporation	ALBANIA		Enter smelter detail
6						
7						
8						
9						

Any smelter not in the dropdown menu is not known by the CFSI and therefore you must provide the required fields (to the right) at a minimum and as many other fields as possible to help identify the newly identified smelter.

CAUTION FOR COMPLETING SMELTER INFORMATION:

Select from dropdown menu when completing smelter information as much as possible. If you copy/paste the list and if the information and the dropdown list information are not aligned, mismatched smelter information may be reported as entities not yet identified as smelters by CFSI. It is important to research smelter information taking the following points into account even when copy/paste the list:

- Start by communicating smelter reporting expectations to your supplier e.g. provide this guidance document for clear instructions, no duplicates in smelter list, complete Column “0” mine location whenever possible, use the Smelter Reference List in the CMRT for all known smelters etc.
- Review your smelter list and ensure that the mandatory fields are populated and that the correct values are listed in the correct cells.
- Review your smelter list and remove any duplicate smelter or refiner entries.
- It is recommended that you are ready to explain any smelters or refiners who are not currently recognized by CFSI as a valid smelter or refiner. This can be done by conducting a web search to validate that they are in fact a smelter.
- It is recommended that you provide mine country location (Column 0) if available for any smelter or refiner who is not yet audited through the CFSI Conflict Free Sourcing Program.
- Use the dropdown menu for all known smelters.
- Software solutions based on the CMRT can help with the roll up process.
- NOTE:
 - Software tools may not remove all duplicates.
 - When removing duplicate smelters (whether manually or via software) be sure not to remove different smelter locations.
 - Your customer may designate a specific portal or software solution.
- If a mine is in a covered country (Democratic Republic of the Congo (DRC) Congo Republic, Central Africa Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia, or Angola) do not panic. The SEC Rule does not prohibit sourcing 3TG from the DRC or covered countries, but rather encourages responsible sourcing from the region. It is important to include this information in your smelter list.

ADDITIONAL INFORMATION:

Metal (*): Use the pull down menu to select the metal for which you are entering smelter information. This field is mandatory.

Smelter Reference List(*): Select from dropdown. This is the list of known smelters as of template release date. If smelter is not listed select ‘Smelter Not Listed’. This will allow you to enter the name of the smelter in Column D. This field is mandatory.

Smelter Name (*): Fill in smelter name if you selected “Smelter Not Listed” in column C. This field will auto-populate when a smelter name is selected in Column C. This field is mandatory.

Smelter Country (*): This field will auto-populate when a smelter name is selected in column C. If you selected “Smelter Not Listed” in column C, use the pull down menu to select the country location of the smelter. This field is mandatory.

Smelter Identification: This is a unique identifier assigned to a smelter or refiner according to an established smelter and refinery identification system. It is expected that multiple names or aliases could be used to describe a single smelter or refiner and therefore multiple names or aliases could be associated to a single ‘Smelter ID’.

Source of Smelter Identification Number: This is the source of the Smelter Identification Number entered in Column F. If a smelter name was selected in Column C using the dropdown box, this field will auto-populate.

Smelter Street: Provide the street name on which the smelter is located. This field is optional.

Smelter City: Provide the city name of where the smelter is located. This field is optional.

Smelter Location: State/Province, if applicable-Provide the state or province where the smelter is located. This field is optional.

Smelter Contact Name: The Conflict Minerals Reporting Template (CMRT) is circulated among companies in the requesting company’s supply chain to ensure compliance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the U.S. Securities and Exchange Commission Final Rule on conflict minerals.

If the template is circulated in a country where laws protecting personal information exist, sharing personal contact information in the CMRT may violate related regulations. Therefore, it is recommended that the requesting company take precautions such as obtaining the contact person's permission to share the information with other companies in the supply chain when completing "Smelter Contact Name" and the "Smelter Contact Email" columns.

If you have permission to share this information, please fill in the name of the Smelter Facility Contact person who you worked with.

Smelter Contact Email: Fill in the email address of the Smelter Facility contact person who was identified as the Smelter Contact Name. Example: John.Smith@SmelterXXX.com. Please review the instructions for Smelter Contact Name before completing this field.

Proposed next steps: This is a comments area, which allows the company to specify the next steps to manage smelters. These are the actions you may take with the smelter if the facility is not listed on the CFSI Conflict-Free Smelter Program (CFSP) Compliant Smelter List. Example: request smelter facility to be assessed through the CFSP, remove from preferred supplier list, etc.

Name of Mine(s): This field allows a company to define the actual mines being used by the smelter. Please enter the actual mine names if known. If 100% of the smelter's feedstock originates from recycled or scrap sources, enter "Recycled" or "Scrap" in place of the name of the mine and answer "Yes" in Column P.

Location (Country) of Mine(s): This is a free form text field that allows a company to define the location of the mines being used by the smelter. Please enter the country of the mine(s). If the country of origin is not known, enter "Unknown". If 100% of the smelter's feedstock originates from recycled or scrap sources, enter "Recycled" or "Scrap" in place of the country of origin. This field is optional.

Does 100% of the smelter's feedstock originate from recycled or scrap sources?: Please answer "Yes" if the smelter solely obtains inputs for its smelting process(es) from recycled or scrap sources. Answer "No" otherwise.

Comments: Free form text field to enter any comments concerning the smelter. Example: smelter is being acquired by Company YYY

CHECKER TAB

The Checker worksheet is used to verify if all the required information in the Template has been completed. It is updated real-time and can be reviewed at any time while using the Template.

To use this sheet, verify if all required fields have been completed (completed fields will be highlighted in green). If not, look for the red field(s) and review the "Notes" in Column C for required actions. You may use the URL in Column D to directly access the field for completion.

A	B	C	D
Required Fields	Answer provided	Notes	Required fields remaining to be completed 38 Hyperlink to source
To ensure all required fields have been populated before submitting to your customers review form for any line items highlighted in red Click here to return to Declaration tab	Click here to return to Smelter List		
Company Name (*):	Company A	Complete	
Declaration Scope or Class (*):	A. Company	Complete	
Description of Scope:		Complete	
Contact Name (*):	John Smith	Complete	
Email - Contact (*):	John.Smith@companyA.com	Complete	
Phone - Contact (*):	555-555-5555	Complete	
Authorizer (*):	John Smith	Complete	
Email - Authorizer (*):	John.Smith@companyA.com	Complete	
Phone - Authorizer (*):	555-555-5555	Complete	
Effective Date (*):	1-Jan-2016	Complete	
1) Is the 3TG intentionally added to your product? (*)			
Tantalum (*):		Declare if Tantalum is intentionally added to your products on Declaration tab cell D26	Click here to answer question 1 for Tantalum
Tin (*):		Declare if Tin is intentionally added to your products on Declaration tab cell D27	Click here to answer question 1 for Tin
Gold (*):		Declare if Gold is intentionally added to your products on Declaration tab cell D28	Click here to answer question 1 for Gold
Tungsten (*):		Declare if Tungsten is intentionally added to your products on Declaration tab cell D29	Click here to answer question 1 for Tungsten

PRODUCT LIST TAB

The Product List tab allows manufacturers to list of the products under the scope of this Declaration. This section of the CMRT is mandatory if manufacturers selected Product (or List of Products) in the Company Information section.

A	B	C	D	E
1	Completion required only if reporting level "Product (or List of Products)" selected on the 'Declaration' worksheet.			
2	 cfsi An initiative of the ERI, UL and SRI			
3				
4				
5	Manufacturer's Product Number (*)	Click here to return to Declaration tab	Manufacturer's Product Name	Comments
6				
7				
8				
9				
10				
11				
12				

ACRONYMS AND DEFINITIONS

3TG (also known as Conflict Minerals)	Tin, tantalum, tungsten, or gold in any form and sourced from any location on earth
AIAG	Automotive Industry Action Group (www.aiag.org/conflictminerals)
CFSI	Conflict-Free Sourcing Initiative (http://www.conflictfreesourcing.org/)
Conflict-Free Smelter Program (CFSP)	The Conflict-Free Smelter Program (CFSP) is a program developed by the EICC and GeSI to enhance company capability to verify the responsible sourcing of metals. Further details of the CFSP can be found here: http://www.conflictfreesourcing.org/conflict-free-smelter-program/
Conflict Minerals Reporting Template (CMRT)	Formerly known as the EICC-GeSI Template, this excel based file is the common reporting tool for suppliers to survey their supply base for smelter information. The data format is also noted in the IPC-1755 Conflict Minerals Data Exchange standard.
Conflict Mineral	As defined in 2010 United States legislation, Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502(e)(4): CONFLICT MINERAL.—The term “conflict mineral” means— (A) columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives; or (B) any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country (available at http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf)
Covered Countries	Refers to the Democratic Republic of the Congo (DRC) and adjoining countries (Congo Republic, Central Africa Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia, or Angola)
DRC conflict-free	Products that do not contain minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or an adjoining country. Source: 2010 United States legislation, Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502 (http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf).
EICC	Electronic Industry Citizenship Coalition (www.eiccoalition.org)
ICC-GeSI template	Supply chain survey for conflict minerals, now known as the Conflict Minerals Reporting Template (CMRT)
GeSI	Global e-Sustainability Initiative (www.gesi.org)
Gold (Au) refiner (smelter)	A gold refiner is a metallurgical operation that produces fine gold with a concentration of 99.5% or higher from gold and gold-bearing materials with lower concentrations. Refer to the CFSP audit protocol for this metal for a complete description: http://www.conflictfreesourcing.org/audit-protocols-procedures/ .
Independent Third-Party Audit Firm	With respect to smelter audits, an “Independent Third-Party Audit Firm” is a private sector organization competent in evaluating the smelter or refiner’s materials traceability against the standards of the CFSP or equivalent audit protocols. To maintain neutrality and impartiality, such organization and its audit team members must have no conflicts of interest with the auditee.

Intentionally added	<p>Intentionally added is commonly known as the deliberate use of a substance, or in this case metal, in the formulation of a product where continued presence is desired to provide a specific characteristic, appearance or quality.</p> <p>While the SEC does not define the phrase “intentionally added” in the final rule*, the rule’s preamble states:</p> <p>“[W]e agree that being intentionally added, rather than being a naturally-occurring by-product, is a significant factor in determining whether a conflict mineral is “necessary to the functionality or production” of a product. This is true regardless of who intentionally added the conflict mineral to the product so long as it is contained in the product. [D]etermining whether a conflict mineral is considered “necessary” to a product should not depend on whether the conflict mineral is added directly to the product by the issuer or whether it is added to a component of the product that the issuer receives from a third party. Instead, the issuer should ‘report on the totality of the product and work with suppliers to comply with the requirements.’ Therefore, in determining whether a conflict mineral is “necessary” to a product, an issuer must consider any conflict mineral contained in its product, even if that conflict mineral is only in the product because it was included as part of a component of the product that was manufactured originally by a third party.”</p> <p>*[56296 Federal Register / Vol. 77, No. 177 / Wednesday, September 12, 2012 / Rules and Regulations]</p>
IPC	The global trade association serving the printed board and electronics assembly industries, their customers and suppliers (www.ipc.org)
JEITA	Japan Electronics and Information Technology Industries Association (www.jeita.or.jp/english)
Necessary for the Production of a Product	<p>The SEC does not provide a formal definition of this phrase in the final rule*; however, it provides some guidance: A conflict mineral will be considered to be necessary to the production of a product when: 1) it is intentionally included in the product’s production process, other than if it is included in a tool, machine, or equipment used to produce the product (such as computers or power lines); 2) it is included in the product (MUST be contained in the product to be applicable); and 3) it is necessary to the product.</p> <p>*[56296 Federal Register / Vol. 77, No. 177 / Wednesday, September 12, 2012 / Rules and Regulations]</p>
OECD	Organisation for Economic Co-operation and Development (www.oecd.org)
Product	A company’s Product or Finished good is a material or item which has completed the final stage of manufacturing and/or processing and is available for distribution or sale to customers.
Recycled or Scrap Sources	Recycled or scrap sources are recycled metals, that are reclaimed end-user or post-consumer products, or scrap processed metals created during product manufacturing. Recycled metal includes excess, obsolete, defective, and scrap metal materials that contain refined or processed metals that are appropriate to recycle in the production of tin, tantalum, tungsten and/or gold. Minerals partially processed, unprocessed or byproducts from other ores are not included in the definition of recycled metal.
Relevant suppliers	Generally, companies should define their universe of relevant suppliers in a manner which addresses the accepted tolerance for compliance of their stakeholders. Companies commonly define “relevant suppliers” as: 1) all suppliers that use 3TG in the parts that they provide to your company; or 2) suppliers of a particular commodity known to contain 3TG.
RCOI	Reasonable Country of Origin

SEC	Securities and Exchange Commission (www.sec.gov)
Smelter	A smelter or refiner is a company that procures and processes mineral ore, slag and/or materials from recycled or scrap sources into refined metal or metal containing intermediate products. The output can be pure (99.5% or greater) metals, powders, ingots, bars, grains, oxides or salts. The terms "smelter" and "refiner" are used interchangeably throughout various publications.
Smelter Identification Number	A unique identification number the CFSI assigns to companies that have been reported by members of the supply chain as smelters or refiners. The identification number alone does not indicate CFSP verification.
Tantalum (Ta) smelter	A tantalum smelter (also known as a processor) is defined as a company that converts Ta-containing ores, concentrates, slags or secondary materials into tantalum intermediate products or other tantalum containing products for direct sales or further processing into Ta-containing products, such as Ta powders, Ta components, Ta oxides, alloys, wires, sintered bars, etc. Refer to the CFSP audit protocol for this metal for a complete description at: http://www.conflictfreesourcing.org/audit-protocols-procedures/ .
Tin (Sn) smelter	Primary [tin] smelters are companies with one or more facilities treating tin containing ore concentrates in order to produce tin metal. Secondary [tin] smelters are companies with one or more facilities that treat secondary materials by reduction for the production of crude or higher grade tin or tin product such as solder. A smelter as referred to within this audit protocol may operate as either one or both types of business operation. Refer to the CFSP audit protocol for this metal for a complete description: http://www.conflictfreesourcing.org/audit-protocols-procedures/ .
Tungsten (W) smelter:	A company with one or more facilities that converts W-containing ores (such as wolframite and scheelite), W concentrates, or W-bearing scrap (secondary material) into tungsten containing intermediates such as Ammonium Para-Tungstate (APT), Ammonium Meta-Tungstate (AMT), ferrotungsten, and tungsten oxides for direct sales or further processed into W-containing products (such as W powder or W-carbide powder). Refer to the CFSP audit protocol for this metal for a complete description: http://www.conflictfreesourcing.org/audit-protocols-procedures/ .