



Interim Jewelry Leaderboard Methodology Report

The Enough Project Team August 2014

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Conflict gold in eastern Congo

The Democratic Republic of the Congo ("Congo") has endured more than two decades of violent conflict in which more than 5.4 million people have died from war-related causes. One of the primary drivers of violence has been the trade in conflict minerals—gold, tin, tantalum, and tungsten. While there has been significant progress in reducing the profits to armed groups from three out of the four conflict minerals,¹ the trade in conflict gold continues to finance armed groups, according to the U.N. Group of Experts on the Congo.² Armed groups use violence to control gold mines and trading routes; they profit from eastern Congo's rich gold resources, and they terrorize civilians. Congo's conflict gold is mainly smuggled to Uganda, Burundi, and Dubai and then it enters the global market, tainting the entire gold supply chain.³ Companies in the gold industry—jewelry retailers and manufacturers, refiners, miners, and investors have the opportunity to help break the link between gold and violence in Congo and the surrounding region.

Campaign and leaderboard

In late 2013, the Enough Project began efforts to create a leaderboard of jewelry retailers that are taking action to combat the conflict gold trade. The interim leaderboard published here is one element of a broader campaign to engage jewelers, encourage companies to exercise supply chain due diligence, and educate the public with a positive narrative, highlighting industry efforts to help solve the problem of conflict gold. Enough's aim in creating a jewelry leaderboard and an accompanying conflict gold campaign is to support responsible minerals trade initiatives in Congo and the region that help develop conflict-free mining, economic development in mining communities, and opportunities to source conflict-free gold from eastern Congo. Enough surveyed the top-selling jewelry retailers in the United States with three purposes:

- to enhance their understanding of the importance of this issue;
- to determine what efforts they are undertaking to address the issue of conflict gold; and
- to convey suggested areas for improvement that can make a real difference in combating the conflict gold trade.

This interim leaderboard provides a first progress report. Some companies in the jewelry industry have already, to varying degrees, taken steps to end the conflict gold trade in Congo. Enough recognizes stepby-step progress and hopes that the achievements of some companies will spur the industry as a whole to pursue the more robust engagement that is still needed. All companies in Enough's survey have room for improvement, and increased collaborative efforts by companies are necessary to break links between violence and gold from eastern Congo. To that end, as a follow-up to this interim leaderboard, Enough will publish a formal leaderboard during the upcoming holiday season, based on an updated survey of retailers. It will be accompanied by a public campaign encouraging leaders to continue to make progress and others to engage in positive action.

Participating companies

The Enough Project included in its survey the 15 jewelry "supersellers"—retailers with the largest sales in North America, and therefore with the most industry and market influence. One of those companies, Zale Corporation, was acquired by another superseller, Signet Jewelers Limited, leaving 14 retailers in the list of companies surveyed.⁴ All jewelry retailers have leadership opportunities and important roles to play in encouraging responsible sourcing and community development initiatives in Congo. Enough is particularly encouraging jewelry retailers to help set up conflict-free sourcing initiatives in Congo like the Solutions for Hope projects.⁵ Enough is in regular communication with several smaller jewelers as well, some of which are taking important steps toward sourcing conflict-free gold and supporting communities that have been negatively affected by the conflict gold trade in Congo.⁶

Enough has highlighted the top half of the 14 jewelry supersellers in this interim leaderboard.⁷ Those companies and their respective percentage scores against Enough's criteria are as follows: Tiffany & Co. (41 percent), Signet Jewelers Limited (35 percent), QVC, Inc. (20 percent), J.C. Penney Company, Inc. (18 percent), Target Corporation (17 percent), Cartier (16 percent), Macy's, Inc. (15 percent).

Criteria

The Enough Project chose criteria based on an analysis of what factors would best contribute to an end to conflict gold trading and to increased peace and development in eastern Congo and the Great Lakes region of Africa. Responsible practices in the jewelry retail business are wide-ranging, but the leaderboard and campaign do not aim to cover all aspects of corporate social responsibility. The focus is instead on a specific set of meaningful opportunities and actions to curb the economic drivers of the deadliest conflict since World War II. Enough therefore crafted the criteria to emphasize a range of methods through which companies can take positive steps toward the sourcing of conflict-free gold from Congo. The survey covers four categories of engagement, encompassing simple and more complex action items with varying levels of potential impact.⁸

Each criterion in the survey is assigned points based on the level of potential impact on the goal of ending the conflict gold trade in Congo. Criteria pertaining to the actions that will make the biggest difference in Congo and require more resources or effort receive more points to give companies incentives to focus their efforts where they will have the most impact. The Enough team calculated the points based on a

2 The Enough Project • www.enoughproject.org Interim Jewelry Leaderboard Methodology Report rigorous information-gathering and deliberation process. The attached annexes provide detailed information and explanations for how points were awarded and how top companies were chosen.

Information sources

Enough gathered information from a wide range of public and non-public sources to assess what actions companies have taken and to assign points to each company based on the criteria for the creation of the interim leaderboard. Information sources included: written correspondence, telephone calls and inperson meetings with company representatives, and consultations with industry experts that include industry consultants, non-profit organizations, industry association representatives, and multi-stakeholder group representatives.

Public information sources included company websites, industry association websites, Securities and Exchange Commission filings (in particular, Forms SD and Conflict Minerals Reports filed by companies or parent companies in the survey group of 14), and companies' public reports on sustainability or corporate social responsibility.

Enough contacted each surveyed company multiple times since late 2013, sending each an introductory letter in October 2013, a survey with the full criteria and available points in February 2014, and an update on standings in early July 2014. In each correspondence, Enough requested a direct conversation with a representative from the company. Beyond those three points of communication with all surveyed companies, some companies were more responsive, and Enough communicated with them in more detail over email, telephone, and in person. The purpose of the correspondence was to gather additional information about companies' efforts and actions, clarify discrepancies or vagueness in the data, ensure the accuracy of points awarded, and to encourage companies to raise questions, provide feedback, and take action.

Next steps

This interim leaderboard provides a preliminary assessment. Enough will release a formal leaderboard involving the same 14 companies leading up to the 2014 holiday season. An accompanying public campaign will ensure that the leaders enjoy the recognition they deserve, consumers know which companies are taking positive action, and all industry players are encouraged to participate in ending the violence in Congo that is facilitated by conflict gold trading.

Endnotes

¹ Fidel Bafilemba, Timo Mueller, and Sasha Lezhnev, "The Impact of Dodd-Frank and Conflict Minerals Reforms on Eastern Congo's War," (Washington: Enough Project, June 2014), available at

http://www.enoughproject.org/reports/impact-dodd-frank-and-conflict-minerals-reforms-eastern-congo%E2%80%99s-war.

² U.N. Security Council, "Final report of the Group of Experts on the Democratic Republic of the Congo," S/2014/42, pp. 3, 17, 18, 23, 24, 26, 27, 35-42, January 23, 2014, available at

http://www.un.org/sc/committees/1533/egroup.shtml.

³ For more background information, see The Enough Project, "From Child Miner to Jewelry Store: The Six Steps of Congo's Conflict Gold," (October 2012), available at http://enoughproject.org/reports/child-miner-jewelry-store-six-steps-congos-conflict-gold.

⁴ The 14 companies are: Signet Jewelers Limited, Target Corporation, Tiffany & Co., J.C. Penney Company, Inc., Wal-Mart Stores, Inc., Macy's, Inc., Sears Holdings Corporation, Neiman Marcus Group Ltd Llc, Costco Wholesale Corporation, Helzberg Diamonds, QVC, Inc., Ross-Simons, Jewelry Television, and Cartier. National Jeweler, "\$100 Million Supersellers," available at http://www.enoughproject.org/reports/impact-dodd-frank-and-conflictminerals-reforms-eastern-congo%E2%80%99s-war (last accessed August 2014). The Enough Project included the top 15 from this list, then eliminated Zale Corporation after it was purchased by Signet Jewelers Limited, bringing the list of participating companies to 14.

⁵ Solutions for Hope, "A Platform to Support Responsible Sourcing, Peacebuilding, and Community Development," http://solutions-network.org/site-solutionsforhope/ (last accessed August 2014)

⁶ Bario Neal and Brilliant Earth are two such companies that are early adopters of supply chain due diligence measures and conflict-free sourcing practices, including sourcing gold through the Fairmined initiative. Alliance for Responsible Mining, "First US based refiner and jewelers join the FAIRMINED initiative," Press release, October 18, 2013, available at http://www.communitymining.org/en/about-arm/annual-reports-and-pressreleases/prensa/533-first-us-based-refiner-and-jewelers-join-the-fairmined-initiative.

⁷ The decision to highlight the top half of surveyed companies (rather than including more or fewer in the leaderboard) is subject to change for the future formal leaderboard that will be published leading up to this coming holiday season.

⁸ The four overarching categories include company policy, engagement with suppliers, participation in initiatives to help build a clean gold trade in Congo and the Great Lakes region, and commitment to building a clean gold supply chain in Congo and the Great Lakes region. The complete criteria can be viewed in Annex 1.

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Criteria Annex

Company	Points	Percentage
Tiffany & Co.	21	41.18%
Signet Jewelers Limited	18	35.29%
QVC, Inc.	10	19.61%
J.C. Penney Company, Inc.	9	17.65%
Target Corp.	8.5	16.67%
Cartier	8	15.69%
Macy's, Inc.	7.75	15.20%
Helzberg Diamonds	6	11.76%
Costco Wholesale Corp.	4	7.84%
Wal-Mart Stores, Inc.	3	5.88%
Sears Holdings Limited	1	1.96%
Neiman Marcus Group	0	0.00%
Jewelry Television	0	0.00%
Ross-Simons	0	0.00%

	Possible Points	Explanation of Points Distribution
Section 1: Company Policy (6)		
a) Does the company have a policy articulating its commitment to ensuring that its sourcing practices do not support armed conflict and gross human rights abuses (i.e., either a conflict minerals policy that explicitly covers gold, or a policy that specifically covers conflict gold)?	policy publicly available; an additional 1 for	To receive full credit for this question, the policy needs to explicitly mention conflict, conflict minerals, or require company adherence to RJC Code of Practices. For companies that put their policy on a difficult to access third party website, this qualifies as publicly available but not easily accessible to a public audience.
b) Has the company committed to implementing internationally- accepted supply chain due diligence standards, such as the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas?	2 points	Full credit is given to companies which have made a forward- looking committment. Half credit is given to companies which have used, implemented, or complied with such guidelines, but have not publicly committed to doing so in the future.
c) Has the company disseminated its policy on conflict gold throughout the company, including to subsidiaries involved in the sourcing and sales of gold?	1 point	To receive full credit for this question, the company has to disseminate the conflict minerals/gold policy at least to relevant personnel. The dissemination must have been more direct than posting to a website, and a brief description on the nature of the dissemination was needed. Enough fully encourages all companies to actively disseminate the policy to all employees.
d) Has the company provided interactive employee training on the policy?	1 point	Full credit is given to companies which provide any form of direct training to employees on the policy, including a relevant subset of employees such as a working group. However, the training must have been given to employees (trainings for suppliers/vendors are positive but did not qualify for points here). A brief description of the nature of the training was required.
Section 2: Engagement with Suppliers (10)		
a) Has the company communicated its conflict gold policy to its suppliers (at minimum, 1st-tier suppliers)?	1 point	To receive full credit for this question, the policy must have been communicated directly to suppliers. Only posting to a website did not qualify. A brief description on the form of the communication was needed.
b) Has the company publicly committed itself to sourcing only from conflict-free refiners certified by the Conflict-Free Smelter program, London Bullion Market Association, or Responsible Jewellery Council (RJC), as conflict-free smelters become available?	3 points	To receive points for this question, the commitment must be public, and it must require suppliers to source from at least one one of the three programs listed. Points are not given solely for inquiries as to whether or not suppliers or smelters are certified.

		Full credit is given to companies which publish the known number
		of refiners in their supply chains. Full credit is also given to
		companies which publish the number of known suppliers and
c) Has the company published the number of refiners in its supply		refiners together. No credit is given to companies which only
chain?	1.5 points	publish the number of suppliers.
d) Has the company published the names of its		Full credit is given to companies which publish the names of known
refiners in its supply chain?	1.5 points	refiners in their supply chains.
		To receive full credit for this question, the meetings must
		specifically include discussion of sourcing conflict-free gold from the
e) Has the company held meetings with its suppliers to develop	3 points: 2 for 1 meeting,	Democratic Republic of Congo (DRC). A brief description of the
strategies for sourcing conflict-free gold from Congo?	3 for 2+ meetings	discussion was needed to gain points here.
Section 3: Participation in Initiatives to Help Build a Clean Gold		
Trade in Congo and the Great Lakes Region (9)		
a) Is the company a member of the Public Private Alliance for		
Responsible Minerals Trade (PPA)?	3 points	
b) Has the company attended the forums of the OECD Due		
Diligence Guidance for Responsible Supply Chains of Minerals from	2 points: 1 for 1 forum, 2	
Conflict-Affected and High-Risk Areas?	for multiple forums	
c) Is the company a member of RJC or the Initiative for Responsible		
Mining Assurance (IRMA)?	1 point	
d) Has the company been certified by the RJC Chain-of-Custody		
Certification program?	2 points	
	1 point: 1/2 for	
	participation 1-2 times;	
	an additional 1/2 for	
e) Does the company participate in the multi-stakeholder group	participation more than 2	
(MSG) run by the Responsible Sourcing Network?	times	
Section 4: Commitment to Building a Clean Gold Supply Chain in		
Congo and the Great Lakes Region (26) a) is the company participating in the solutions for Hope Gold		
process, organized by Resolve, or an analogous initiative to source		
conflict-free gold from Congo? (For the Resolve process: 2 points		
for committing to participate, 1 point for attending one or more		
meetings, 2 points for being a member of a working group. Points		
for an analogous process will be determined on the basis of		
information provided.)	5 points	

	6 points: 4 for sourcing	
	from the Great Lakes	
b) Is the company sourcing verifiably conflict-free gold from the	region, 2 additional for	
Great Lakes region of Africa (the Democratic Republic of the Congo	sourcing specifically from	
or any country bordering)?	Congo	
c) Is the company sourcing conflict-free gold specifically from the		
Kivu provinces of Congo?	11 points	
d) Does the company or company foundation support community- approved income generation and/or development projects for mining communities in Congo's Kivu provinces?	4 points: 2 points for support between \$20,000 and \$50,000, 4 points for support above \$50,000	

CARTIER	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
Section 1: Company Policy							
(6)							
				"At Cartier, our gold suppliers have			DIC Carls of Durations
				unequivocally committed, in writing,			RJC Code of Practices
				to responsible gold sourcing practices			includes responsible
				as described by the Responsible			mining practices, including
				Jewellery Council in its Code of			policies on human rights
				Practices. They have also pledged to			and conflict.
				implement every possible measure,			
				within their operations and sphere of			
a) Does the company have				influence, to prevent gold that may be			
a policy articulating its				used to finance human rights			
commitment to ensuring				violations from entering the watch and			
that its sourcing practices			"The company has just	jewelry supply chain, particularly when			
do not support armed			gone through a review of	it comes to the gold products they			
conflict and gross human			the gold sourcing policy,	supply to us. Our suppliers are now			
rights abuses (i.e., either a			particularly on conflict	required to join the RJC and have their		http://www.cartier.com/m	
conflict minerals policy	2 points: 1 for making the			operations certified to its Code of		aison/commitments/cartie	http://www.responsibleje
that explicitly covers gold,	policy publicly available; an		been approved by the	Practices, which covers human rights,		r-and-corporate-social-	wellery.com/files/RJC Cod
or a policy that specifically	additional 1 for making the		Board of Directors, and will	ethical, social and environmental		responsibility/resources-	e of Practices 2013 eng.
covers conflict gold)?	policy easily accessible	2	be up by the end of 2014."	performance."	Did not file	excellence/gold-12160	pdf
b) Has the company							
committed to							
implementing							
internationally-accepted							
supply chain due diligence							We applaud Cartier's
standards, such as the							commitment to
Organization for Economic							participating in the OECD
Cooperation and			"We are also involved in				forums, for which it
Development (OECD) Due			other initiatives addressing				received points in Section
Diligence Guidance for			the issues you have raised				3b. However, being
Responsible Supply Chains			such as the OECD-ICGLR-				"involved in OECD" does
of Minerals from Conflict-			UN GoE Joint Forum on				not amount to committing
Affected and High-Risk			Responsible Mineral				to impelementing OECD
Areas?	2 points	0	Sourcing."	No information available	Did not file	N/A	Due Diligence Guidelines.
			V				
			"All employees who are				
			involved in gold purchasing				
			have been trained in and				
			are already familiar with				
			the policy. All Cartier				
c) Has the company			employees will be				
disseminated its policy on			informed of the policy at				
conflict gold throughout			the time of the next				
the company, including to			communication regarding				
subsidiaries involved in the			the complete CSR policy is				
sourcing and sales of gold?	1 point	1	announced later this year."	No information available	Did not file	N/A	N/A
sourcing and sales of gold?	1 point	1	announceu later this year.			N/A	N/A

CARTIER	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
			"All employees who are				
			involved in gold purchasing				
			have been trained in and				
			are already familiar with				
			the policy. All Cartier employees will be				
			informed of the policy at				
d) Has the company			the time of the next				
provided interactive			communication regarding				
employee			the complete CSR policy is				
training on the policy?	1 point		announced later this year."	No information available	Did not file	N/A	N/A
Section 2: Engagement							
with Suppliers (10)							
			"Cartier's major suppliers,				
			which account for the vast				
			majority of the company's				
			gold supplies, have been involved in the				
			development and roll out				
			of the policy, and have				
			been for a long while.				
			Cartier has a true				
			partnership approach with				
			its supplies based on a				
			supportive expectation of				
a) Has the company			continuous improvement				
communicated its conflict			with regular exchanges				
gold policy to its suppliers			with CSR staff, and mutual				
(at minimum, 1st-tier			sharing of experiences and				
suppliers)?	1 point	1	best practices."	No information available	Did not file	N/A	N/A

CARTIER	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
b) Has the company publicly committed itself to sourcing only from conflict-free refiners certified by the Conflict- Free Smelter program, London Bullion Market Association, or Responsible	Possible Points		Company Response "Cartier's policy is first of all for its suppliers, its employees and internal account managers. It is not the practice of Cartier to advertise its commitments or seek recognition for its CSR performance. However, Cartier already has a public statement on sourcing as part of its CR statement that includes commitments regarding conflict free products/sources and its requirements for its suppliers. It is likely that more specificity will be added to this statement		SEC Filings	Relevant Links	Justification While Cartier has made positive advancements in its committments to conflict-free sourcing, its committments are not
Jewellery Council (RJC), as			once we have rolled out				public, and it has not
conflict-free smelters			our policy and engaged				specified one of the three
become available?	3 points	0	our suppliers."	No information available	Did not file	N/A	programs as listed.
c) Has the company published the number of	4 5		N1 - 1- f + i			81/8	
refiners in its supply chain?	1.5 points	0	No information given	No information available	Did not file	N/A	N/A
d) Has the company published the names of its refiners in its supply chain?	1 E pointe	0	No information given	No information available	Did not file	N/A	N/A
e) Has the company held meetings with its suppliers to develop strategies for	3 points: 2 for 1 meeting, 3		no mornation given			170	
from Congo?	for 2+ meetings		No information given	No information available	Did not file	N/A	N/A
							, -
Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region (9)							

	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
a) Is the company a							
member of the Public							
Private Alliance for							
Responsible Minerals						http://www.resolv.org/site-	
	3 points	0	No information given	No information available	Did not file	ppa/participation/	N/A
b) Has the company							
attended the forums of the							
OECD Due Diligence							
Guidance for Responsible	2 points: 1 for 1 forum, 2						Observation by Enough
Supply Chains of Minerals	for multiple forums	2	No information given	No information available	Did not file	N/A	Project staff at Forums
						http://www.responsibleje	
c) Is the company a						wellery.com/members/cer	
member of RJC or the						tified-members/	
Initiative for Responsible						http://www.responsiblemi	
Mining Assurance (IRMA)?	1 point	1	No information given	Listed as a member of RJC	Did not file	ning.net/participants/	N/A
d) Has the company been certified by the RJC Chain- of-Custody Certification program?	2 points	0	No information given	No information available	Did not file	http://www.responsibleje wellery.com/members/cha in-of-custody-certified- entities/	Parts of the company are certified by the RJC Chain- of-Custody Certification program, but the Cartier boutique shop has not been certified.
	1 point: 1/2 for	0	No information given		Did flot file	entriesy	been certined.
participate in the multi- stakeholder group (MSG) run by the Responsible	participation 1-2 times; an additional 1/2 for participation more than 2 times	0	No information given	No information available	Did not file	http://www.sourcingnetw ork.org/partners/	No points were awarded on the basis of information provided by RSN.
Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region (26)							

CARTIER	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
a) Is the company							
participating in the							
Solutions for Hope Gold							
process, organized by							
Resolve, or an analogous							
initiative to source conflict-							
free gold from Congo?							
(For the Resolve process: 2							
points for committing to							
participate, 1 point for							
attending one or more							
meetings, 2 points for							
being a member of a							
working group. Points for							
an analogous process will							
be determined on the							
basis of information							
provided.)	5 points	0	No information given	No information available	Did not file	N/A	N/A
b) is the company sourcing							
verifiably conflict-free gold							
from the Great Lakes	6 points: 4 for sourcing					http://www.cartier.com/m	
region of Africa (the	from the Great Lakes					aison/commitments/cartie	
Democratic Republic of the						r-and-corporate-social-	
Congo or any country	sourcing specifically from					responsibility/resources-	
bordering)?	Congo	0	No information given	No information available	Did not file	excellence/gold-12160%20	N/A
c) Is the company sourcing							
conflict-free gold							
specifically from the Kivu							
provinces of Congo?	11 points	0	No information given	No information available	Did not file	N/A	N/A
	11 00000	0	No mornation given				
d) Does the company or							
company foundation							
support community-							
approved income							
generation and/or	4 points: 2 points for						
development projects for	support between \$20,000						
mining communities in	and \$50,000, 4 points for						
Congo's Kivu provinces?	support above \$50,000		No information given	No information available	Did not file	N/A	N/A
TOTAL	51	8					

COSTCO	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
Section 1: Company Policy	1						
(6)	1						
				from manufacturare. We do not directly nurshace Conflict Minerals			
	1			from manufacturers. We do not directly purchase Conflict Minerals			
	1			from any source. We are committed to working with our suppliers			
	1			to increase transparency regarding the origin and traceability of			
	1			minerals contained in the products we sell with the goal of ensuring			
	1			that, in due course, all the nonfood merchandise we carry is 'DRC			
	1			Conflict Free.' Commencing January 2013 and going forward,			
	1			Costco's nonfood suppliers will be requested to provide the supply			
	1			chain information necessary to support the Conflict Minerals			
	1			reporting requirements in accordance with the Section 1502 of the			
	1			Dodd-Frank Act, as interpreted by the U.S.Securities and Exchange			
	1			Commission.			
	1			OUR COMMITMENT:			The policy is not
	1	1		1. We support the aims and objectives of the Dodd-Frank Act			posted on the
	1	1		regarding 'Conflict Minerals.'			company website but
	1			2. We do not knowingly buy consumer goods containing minerals			on a third party
a) Does the company have	1	1		that originate from facilities in			website that is difficult
a policy articulating its	1			the 'Conflict Region' that are not certified as 'conflict free'.			to access. A search for
commitment to ensuring	1			3. We ask Costco's suppliers to use reasonable due diligence with			"conflict minerals" or
that its sourcing practices	1			their supply chains to ensure			"conflict minerals
do not support armed	1			that specified metals used in primary and component parts of			policy" on the Costco
conflict	1			consumer goods are being			website does not yield
and gross human rights	2 points: 1 for			sourced only from:			any results. 1 point was
abuses (i.e., either a	making the policy			 Mines and smelters outside the 'Conflict Region', 		http://phx.corporate-	therefore awarded for
conflict minerals policy	publicly available; an			- Mines and smelters which have been certified by an independent		ir.net/External.File?item	the policy; 1 point was
that explicitly covers gold,	additional 1 for			third party as		=UGFyZW50SUQ9MjM3	withheld because the
or a policy that specifically	making the policy			'conflict free' if sourced within the 'Conflict Region', or		ODM4fENoaWxkSUQ9L	policy is not easily
covers conflict gold)?	easily accessible	1	No information given	- Recycled or scrap sources."	No information available	TF8VHIwZT0z&t=1	accessible.
b) Has the company	1						
committed to	1						
implementing	1						
internationally-accepted	1						
supply chain due diligence	1						
standards, such as the	1						
Organization for Economic	1						
Cooperation and	1						
Development (OECD) Due	1				"In accordance with OECD due		
Diligence Guidance for	1	1			diligence guidelines, Costco will		
Responsible Supply Chains	1					http://edgar.sec.gov/Ar	
of Minerals from Conflict-	1				diligence, either through a Conflict	chives/edgar/data/9098	
Affected and High-Risk	1	1			Minerals Report filed under Form SD	32/00009098321400001	
Areas?	2 points	2	No information given	No information available	or the Company's website."	3/exhibit102.htm	N/A
	1	1					
c) Has the company	1	1					
disseminated its policy on	1						
conflict gold throughout	1						
the company, including to	1						
subsidiaries involved in the	I	-					
sourcing and sales of gold?	1 point	0	No information given	No information available	No information available	N/A	N/A

COSTCO	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
d) Has the company							
provided interactive							
employee							
training on the policy?	1 point	0	No information given	No information available	No information available	N/A	N/A
Section 2: Engagement							
with Suppliers (10)							
					"Costco engaged a third-party,		
					Source Intelligence (SI), to identify		
					minerals suppliers in Costco's supply		
					chain for Possible 3TG Products and		
					to collect, store, and review		
					information on 3TG sourcing		
					practices. Communications were sent to the Company's direct		
					suppliers of Possible 3TG Products		
					describing the compliance		
					requirements and requesting conflict		
					minerals information. Suppliers were		
					requested to use the Electronic		
					Industry Citizenship Coalition (EICC)		
					and Global e-Sustainability Initiative		
a) Has the company					(GeSI) Conflict Minerals Due		
communicated its conflict					Diligence Template (EICC-GeSI	http://edgar.sec.gov/Ar	
gold policy to its suppliers					Template) to identify 3TG smelters	chives/edgar/data/9098 32/00009098321400001	
(at minimum, 1st-tier suppliers)?	1 point	1	No information given	No information available	and refiners (SORs) and associated countries of origin."	32/00009098321400001 3/exhibit102.htm	N/A
b) has the company	1 point	1	No information given			S/EXIIDICIO2.IIIII	N/A
publicly committed itself							
to sourcing only from conflict-free refiners							The company merely
certified by the Conflict-				"We ask Costco's suppliers to use reasonable due diligence with			asks (i.e. requests) for
Free Smelter program,				their supply chains to ensure			the suppliers to follow
London Bullion Market				that specified metals used in primary and component parts of			these steps rather than
Association, or				consumer goods are being		http://phx.corporate-	commit (i.e. require
Responsible Jewellery				sourced only from: Mines and smelters outside the "Conflict		ir.net/External.File?item	suppliers) to only
Council (RJC), as conflict-				Region", Mines and smelters which have been certified by an		=UGFyZW50SUQ9MjM3	source from one of the
free smelters become				independent third party as "conflict free" if sourced within the		ODM4fENoaWxkSUQ9L	certification programs
available?	3 points	0	No information given	"Conflict Region", or Recycled or scrap sources."	N/A	TF8VHIwZT0z&t=1	listed.
c) Has the company published the number of							
refiners in its supply							
chain?	1.5 points	0	No information given	No information available	No information available	N/A	N/A
d) Has the company							
published the names of its							
refiners in its supply chain?	1.5 points	0	No information given	No information available	No information available	N/A	N/A
	1.5 points						
e) Has the company held							
meetings with its suppliers							
to develop strategies for	3 points: 2 for 1						
sourcing conflict-free gold	meeting, 3 for 2+	-					
from Congo?	meetings	0	No information given	No information available	No information available	N/A	N/A
		I	ļ			Į	ļ

COSTCO	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
Section 3: Participation in							
Initiatives to Help Build a							
Clean Gold Trade in Congo							
and the Great Lakes							
Region (9)							
a) Is the company a							
member of the Public							
Private Alliance for							
Responsible Minerals						http://www.resolv.org/s	
Trade (PPA)?	3 points	0	No information given	No information available	No information available	ite-ppa/participation/	N/A
b) Has the company							
attended the forums of							
the OECD Due Diligence							
Guidance for Responsible							
Supply Chains of Minerals	2 points: 1 for 1						
from Conflict-Affected and							
High-Risk Areas?	forums		No information given	No information available	No information available	N/A	N/A
Tigh-Nisk Aleas:		0	No information given			IN/A	NA
						http://www.responsiblej	
						ewellery.com/members	
c) Is the company a						/certified-members/	
member of RJC or the						·	
Initiative for Responsible						http://www.responsible	
Mining Assurance (IRMA)?	1 point	0	No information given	No information available	No information available	mining.net/participants/	N/A
d) Has the company been						http://www.responsiblej	
certified by the RJC Chain-						ewellery.com/members	
of-Custody Certification						/chain-of-custody-	
program?	2 points	0	No information given	No information available	No information available	certified-entities/	N/A
e) Does the company	1 point: 1/2 for						
	participation 1-2						No points were
	times; an additional						awarded on the basis
run by the Responsible	1/2 for participation					http://www.sourcingnet	of information
	more than 2 times		No information gives	No information available	No information available	work.org/partners/	
Sourcing Network?	more than 2 times	0	No information given			work.org/partners/	provided by RSN.
					1		
Section 4: Commitment to							
Building a Clean Gold							
Supply Chain in Congo							
and the Great Lakes							
Region (26)							

COSTCO	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
a) Is the company							
participating in the							
Solutions for Hope Gold							
process, organized by							
Resolve, or an analogous							
initiative to source conflict-							
free gold from Congo?							
(For the Resolve process: 2							
points for committing to							
participate, 1 point for							
attending one or more							
meetings, 2 points for							
being a member of a							
working group. Points for							
an analogous process will							
be determined on the							
basis of information							
provided.)	5 points	0	No information given	No information available	No information available	N/A	N/A
b) is the company sourcing							
verifiably conflict-free gold							
	sourcing from the						
- ·	Great Lakes region, 2						
	additional for						
	sourcing specifically						
bordering)?	from Congo	0	No information given	No information available	No information available	N/A	N/A
c) Is the company sourcing							
conflict-free gold							
specifically from the Kivu							
	11 points	0	No information given	No information available	No information available	N/A	N/A
provinces of congo:		0	No mornation given				N/A
d) Does the company or							
company foundation							
support community-	4 points: 2 points for						
approved income	support between						
generation and/or	\$20,000 and						
development projects for	\$50,000, 4 points for						
	support above						
	\$50,000	0	No information given	No information available	No information available	N/A	N/A
TOTAL	51	4					

HELZBERG DIAMONDS	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
Section 1: Company Policy							
(6)							
				"Ulalahang Diamanda is sensormed			
				"Helzberg Diamonds is concerned			
				about the environmental and social			
				impacts of irresponsible mining			
				practices. We are determined to source			
				gold and other precious metals			
				produced under the highest social,			
				human rights and environmental			
				standards. We are working to ensure			
				the gold and other precious metals in			
				our products were not produced at the			
				expense of communities, workers or			
				the environment. We require our			
				suppliers adhere to these same			
a) Does the company have				principles and to be in compliance with			
a policy articulating its				the conflict minerals laws which			
commitment to ensuring				Congress passed as part of the Dodd-			
that its sourcing practices				Frank Wall Street Reform and			
do not support armed				Consumer Protection Act in order to			
conflict				target conflict minerals, including gold,			
and gross human rights	2 points: 1 for making			from the Democratic Republic of the			
abuses (i.e., either a	the policy publicly			Congo (DCR) and surrounding region.			
conflict minerals policy	available; an			We fully condemn the use of any		http://www.helzberg.com/	
	additional 1 for			minerals to fund conflict in the DRC, in		category/about+us/helzber	
or a policy that specifically	making the policy			its adjoining countries or anywhere in		g+diamonds'+supply+chain	
covers conflict gold)?	easily accessible	2	No information given	the world."	No information available	<u>.do</u>	N/A
b) Has the company							
committed to							
implementing							
internationally-accepted							
supply chain due diligence							
standards, such as the							
Organization for Economic					"We believe our processes		
Cooperation and					align with OECD due		
Development (OECD) Due					diligance guidance We		
Diligence Guidance for					will continue to further		
Responsible Supply Chains					implement the OECD due	http://www.sec.gov/Archiv	
of Minerals from Conflict-					diligence guidance."	es/edgar/data/1067983/0	
Affected and High-Risk					(Berkshire Hathaway's SEC	00119312514221549/d734	
Areas?	2 points	2	No information given	No information available	filing)	970dex102.htm	N/A

HELZBERG DIAMONDS	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
a) Llas tha samaanu							
c) Has the company							
disseminated its policy on conflict gold throughout							
the company, including to							
subsidiaries involved in the							
sourcing and sales of gold?	1 noint	0	No information given	No information available	No information available	N/A	N/A
	1 point	0					
			1947 I II				
			"We held one training for				
			store associates on policy				
	1		and responsible sourcing				
			happened roughly 18				
			months ago. They are in-				
			person, held on a Saturday, all day for relevant				
d) Has the company			personnel, and include an interactive quiz. We will				
provided interactive			likely hold another training				
•			like this again before the				
employee training on the policy?	1 point	1	end of the year."	No information available	No information available	N/A	N/A
training on the policy?		1	end of the year.			IN/A	N/A
Section 2: Engagement							
with Suppliers (10)							
			"We communicate our				
			policy through our				
			contracts with our				
			suppliers, which they sign				
			annually. Our policy is to				
	1		not accept conflict				
			minerals from vendors.				
			There is language in the				
a) Has the company	1		vendor contracts that				
communicated its conflict	1		specifically speaks to the				
gold policy to its suppliers	1		Dodd Frank Act's section				
(at minimum, 1st-tier	1		1502. Invoices must state				
suppliers)?	1 point	1	the country of origin."	No information available	No information available	N/A	N/A

HELZBERG DIAMONDS	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
b) Has the company							
publicly committed itself to							
sourcing only from conflict-							
free refiners certified by							
the Conflict-Free Smelter							
program, London Bullion							
Market Association, or							
Responsible Jewellery							
Council (RJC), as conflict-							
free smelters become							
available?	3 points	0	No information given	No information available	No information available	N/A	N/A
c) Has the company							
published the number of							
refiners in its supply chain?	1.5 points	0	No information given	No information available	No information available	N/A	N/A
	10 pointo	Ū					
d) Has the company							
published the names of its							
refiners in its supply chain?	1.5 points	0	No information given	No information available	No information available	N/A	N/A
a) Has the company hold							
 e) Has the company held meetings with its suppliers 							
	2 mainter 2 fam 1						
to develop strategies for	3 points: 2 for 1						
	meeting, 3 for 2+	0	No information given	No information available	No information available	NI/A	NI / A
from Congo?	meetings	0	No information given			N/A	N/A
Section 3: Participation in							
Initiatives to Help Build a							
Clean Gold Trade in Congo							
and the Great Lakes							
Region (9) a) is the company a							
member of the Public							
Private Alliance for							
Responsible Minerals						http://www.resolv.org/site-	
	3 points	0	No information given	No information available	No information available	ppa/participation/	N/A
b) Has the comment							
 b) Has the company attended the forums of the 							
OECD Due Diligence							
Guidance for Responsible	2 points 1 for 1						
	2 points: 1 for 1						
	forum, 2 for multiple	0	No information given	No information available	No information available	NI/A	N/A
High-Risk Areas?	forums	0	No information given	No information available	No information available	N/A	N/A

HELZBERG DIAMONDS	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
						http://www.responsibleje	
c) Is the company a						wellery.com/members/cer	
member of RJC or the			"We are friendly with RJC			tified-members/	
Initiative for Responsible			but we are not an official			http://www.responsiblemi	-
Mining Assurance (IRMA)?	1 noint		member."	No information available	No information available	ning.net/participants/	N/A
d) Has the company been	1 point	0	member.			http://www.responsibleje	
certified by the RJC Chain-						wellery.com/members/cha	
of-Custody Certification						in-of-custody-certified-	
, program?	2 points	0	No information given	No information available	No information available	entities/	N/A
e) Does the company	1 point: 1/2 for						No points were
participate in the multi-	participation 1-2						awarded on the
	times; an additional						basis of
run by the Responsible	1/2 for participation					http://www.sourcingnetw	information
Sourcing Network?	more than 2 times	0	No information given	No information available	No information available	ork.org/partners/	provided by RSN.
		0	No information given			ork.org/partners/	provided by NSIN.
Section 4: Commitment to							
Building a Clean Gold							
Supply Chain in Congo and							
the Great Lakes Region							
(26)							
(20)							
a) Is the company							
participating in the							
Solutions for Hope Gold							
process, organized by							
Resolve, or an analogous							
initiative to source conflict-							
free gold from Congo?							
(For the Resolve process: 2							
points for committing to							
participate, 1 point for							
attending one or more							
meetings, 2 points for							
being a member of a							
working group. Points for							
an analogous process will							
be determined on the basis							
of information provided.)	5 points	0	No information given	No information available	No information available	N/A	N/A

	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
b) is the company sourcing							
verifiably conflict-free gold	6 points: 4 for						
from the Great Lakes	sourcing from the						
region of Africa (the	Great Lakes region, 2						
Democratic Republic of the	additional for sourcing						
Congo or any country	specifically from						
bordering)?	Congo	0	No information given	No information available	No information available	N/A	N/A
c) Is the company sourcing conflict-free gold specifically from the Kivu provinces of Congo?	11 points	0	No information given	No information available	No information available	N/A	N/A
generation and/or development projects for mining communities in	4 points: 2 points for support between \$20,000 and \$50,000, 4 points for support above \$50,000	0	No information given	No information available	No information available	N/A	N/A
TOTAL	51	6	No mornation given				

JCPENNEY	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
Section 1: Company Policy							
(6)							
				"JCPenney fully supports			
				the humanitarian goals of			
				the Dodd Frank Act –			
				eliminating illegal mineral			
				trading and the funding of			
				armed conflict while			
				supporting legitimate			
				commercial ventures.			
				JCPenney purchases			
				finished consumer goods			
				from manufacturers and	"In 2013, we developed a Conflict Minerals Policy		
				does not directly purchase	that established the following expectations for		
				any Conflict Minerals from	suppliers. Suppliers may not include in any products		
				any source. Since the	sold to JCPenney any tin, tantalum, tungsten or gold		
			"In 2013, we issued a	supply chain for Conflict	mined in the DRC or adjoining countries that fund		
a) Does the company have			Conflict Minerals Policy,	Minerals is complex, we	armed conflict; Suppliers are required to develop		
a policy articulating its			which includes our	are committed to working	Conflict Minerals policies, due diligence frameworks		
commitment to ensuring			• • • • • • •	with our supply chain to	and management systems consistent with OECD	http://www.jcpenney.	
that its sourcing practices			conflict minerals, including		guidelines and to drive those efforts throughout	net/JCPenney/media/S	
do not support armed			gold. As outlined in our	regarding the origin and	their supplier chain; Suppliers of certain JCPenney	iteImages/PDF%20doc	
conflict			Policy, suppliers may not	traceability of minerals	products will be required to provide written	/jcp-Conflict-Minerals	
and gross human rights	2 points: 1 for		include in any products	contained in our products	evidence of due diligence documentation including	Policy-FINAL-03-01-	
abuses (i.e., either a	making the policy		sold to JCPenney any tin,	with the goal of ensuring	completion of the EICC-GeSI Conflict Minerals	<u>2013.pdf</u>	
conflict minerals policy	publicly available; an		, 0 0	that all products sold by	Reporting Template; To the extent available,	http://www.sec.gov/A	
that explicitly covers gold,	additional 1 for		mined in the DRC or	JCPenney to our	Suppliers must use EICC-GeSI designated Conflict-	rchives/edgar/data/11	
or a policy that specifically	making the policy		adjoining countries that	customers are 'DRC	Free Smelters as the source for any of the Conflict	66126/0001166126140	
covers conflict gold)?	easily accessible	2	fund armed conflict."	Conflict Free.'"	Minerals used in the products sold to JCPenney."	00032/exhibit102.htm	N/A

JCPENNEY	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
b) Has the company							
committed to							
implementing							
internationally-accepted							
supply chain due diligence							
standards, such as the							
Organization for Economic					"We conducted due diligence on the source and	http://www.sec.gov/A	
Cooperation and				"JCPenney will be carrying	chain of custody of 3TG in our Covered Products in	rchives/edgar/data/11	
Development (OECD) Due					accordance with the Organisation for Economic Co-	66126/0001166126140	
Diligence Guidance for				-	operation and Development Due Diligence Guidance	00032/exhibit102.htm	
Responsible Supply Chains					for Responsible Supply Chains of Minerals from		
of Minerals from Conflict-					Conflict-Affected and High-Risk Areas (the 'OECD	http://ir.jcpenney.com	
Affected and High-Risk	2 nainte	2	No information given		Guidance'), an internationally recognized due	/phoenix.zhtml?c=705 28&p=irol-govCSR	NI / A
Areas?	2 points	2	No information given	guidelines."	diligence framework."	28&p=Irol-govCSR	N/A
c) Has the company							
disseminated its policy on							
conflict gold throughout							
the company, including to							
subsidiaries involved in the							
sourcing and sales of gold?	1 point	0	No information given	No information available	No information available	N/A	N/A
							Although
							JCPenney's policy
							says they "have
							partnered with
							other retailers to
							develop supplier
							education and
							training materials," this does indicate
d) Has the company							that employee
provided interactive							(not supplier)
employee							training has
training on the policy?	1 point	0	No information given	No information available	No information available	N/A	occured.
			<u> </u>				
Section 2: Engagement							
with Suppliers (10)							

JCPENNEY	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
					"In 2013, JCPenney developed (1) a survey for Private Brand and Exclusive Brand suppliers based on the EICC-GeSI Conflict Minerals Template and (2) a training presentation utilizing the Training Tool Kit developed by RILA's Conflict Minerals Program and the Business for Social Responsibility. JCPenney conducted training for our international and domestic suppliers, including training sessions in five		
					Asian countries in January 2013. Members of the working group also conducted in-person visits and factory tours at several facilities in Asia in July 2013, which included training on our Conflict Minerals Policy and JCPenney's expectations for suppliers. In May 2013, JCPenney published a Conflict Minerals Bulletin to suppliers through our online Supplier		
a) Has the company communicated its conflict gold policy to its suppliers					Portal. The Bulletin outlined our Conflict Minerals Policy and instructions for our Private Brand and Exclusive Brand suppliers to submit the Conflict Minerals Survey. All Private Brand and Exclusive Brand suppliers that received JCPenney product packages or specifications related to inventory in our	http://www.sec.gov/A rchives/edgar/data/11	
(at minimum, 1st-tier					supply chain during calendar year 2013 were	<u>66126/0001166126140</u>	
suppliers)?	1 point		No information given	No information available	required to submit a Conflict Minerals Survey."	00032/exhibit102.htm	IN/A
b) Has the company							
publicly committed itself to sourcing only from conflict-free refiners				"To the extent available,		http://www.conflictfre esourcing.org/about/ members-and-	
certified by the Conflict- Free Smelter program, London Bullion Market				Suppliers must use EICC- GeSI designated Conflict- Free Smelters as the		<u>collaborations/</u> http://www.jcpenney.	
Association, or Responsible Jewellery Council (RJC), as conflict-				source for any of the Conflict Minerals used in the products sold to		net/JCPenney/media/S iteImages/PDF%20doc /jcp-Conflict-Minerals	
free smelters become available?	3 points	2	No information given	JCPenney." JCPenney is also a member of CFSI.	No information available	Policy-FINAL-03-01- 2013.pdf	N/A
c) Has the company published the number of	5 points	3				<u>2015.pui</u>	0/3
refiners in its supply chain?	1.5 points	0	No information given	No information available	No information available	N/A	N/A

JCPENNEY	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
d) Has the company							
published the names of its							
refiners in its supply							
chain?	1.5 points	0	No information given	No information available	No information available	N/A	N/A
							Based on the SEC report, JCPenney did conduct trainings;
							however, the SEC report does not
							indicate whether
e) Has the company held							the trainings
meetings with its suppliers	2 nainte 2 far 1						include strategies for sourcing from
to develop strategies for sourcing conflict-free gold	3 points: 2 for 1 meeting, 3 for 2+						the Great Lakes
from Congo?	meeting, 5 101 2+	0	No information given	No information available	No information available	N/A	region.
	ineetings	0	No information given				legion.
Section 3: Participation in							
Initiatives to Help Build a							
Clean Gold Trade in Congo							
and the Great Lakes							
Region (9)							
a) Is the company a							
member of the Public Private Alliance for						http://www.resolv.org	
Responsible Minerals						/site-	
Trade (PPA)?	3 points	0	No information given	No information available	No information available	ppa/participation/	N/A
						ppa/participation/	
b) Has the company							
attended the forums of the OECD Due Diligence							
Guidance for Responsible							
Supply Chains of Minerals	2 points: 1 for 1						
	forum, 2 for multiple						
High-Risk Areas?	forums	0	No information given	No information available	No information available	N/A	N/A
c) is the company a							
c) Is the company a member of RJC or the						http://www.responsibl	
Initiative for Responsible						ejewellery.com/memb	
Mining Assurance (IRMA)?	1 point	1	No information given	Listed as a member of RJC	No information available	ers/certified-members	N/A
		-	Sector Brief				
d) Has the company been						http://www.responsibl	
certified by the RJC Chain-						ejewellery.com/memb	
of-Custody Certification	2	-	No. information of the	No information of the la		ers/chain-of-custody-	N/A
program?	2 points	0	No information given	No information available	No information available	certified-entities/	N/A

JCPENNEY	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
e) Does the company	1 point: 1/2 for						No points were
	participation 1-2						awarded on the
	times; an additional						basis of
run by the Responsible	1/2 for participation					http://www.sourcingn	information
	more than 2 times	0	No information given	No information available	No information available	etwork.org/partners/	provided by RSN.
Sourcing Network?	more than 2 times	0	No information given			etwork.org/partners/	provided by KSN.
Section 4: Commitment to							
Building a Clean Gold							
Supply Chain in Congo and							
the Great Lakes Region							
(26)							
(20)							
a) Is the company							
participating in the							
Solutions for Hope Gold							
process, organized by							
Resolve, or an analogous							
initiative to source conflict-							
free gold from Congo?							
(For the Resolve process: 2							
points for committing to							
participate, 1 point for							
attending one or more							
meetings, 2 points for							
being a member of a							
working group. Points for							
an analogous process will							
be determined on the							
basis of information							
provided.)	5 points	0	No information given	No information available	No information available	N/A	N/A
b) Is the company sourcing							
verifiably conflict-free gold	6 points: 4 for						
from the Great Lakes	sourcing from the						
region of Africa (the	Great Lakes region, 2						
Democratic Republic of	additional for						
the Congo or any country	sourcing specifically						
bordering)?	from Congo	0	No information given	No information available	No information available	N/A	N/A
a) is the company coursing							
c) Is the company sourcing conflict-free gold							
specifically from the Kivu	11 points		No information -in-	No information available	No information available	NI / A	N/A
provinces of Congo?	11 points	0	No information given	No information available	No information available	N/A	N/A

JCPENNEY	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
d) Does the company or							
company foundation							
support community-							
approved income	4 points: 2 points for						
generation and/or	support between						
development projects for	\$20,000 and \$50,000,						
mining communities in	4 points for support						
Congo's Kivu provinces?	above \$50,000	0	No information given	No information available	No information available	N/A	N/A
TOTAL	51	9					

JEWELRY TELEVISION	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
Section 1: Company Policy							
(6)							
a) Does the company have							
a policy articulating its							
commitment to ensuring							
that its sourcing practices							
do not support armed							
conflict							
and gross human rights							
abuses (i.e., either a							
	2 points: 1 for making the						
	policy publicly available;						
	an additional 1 for making						
covers conflict gold)?	the policy easily accessible	0	No information given	No information available	Did not file	N/A	N/A
b) Has the company							
committed to							
implementing							
internationally-accepted							
supply chain due diligence							
standards, such as the							
Organization for Economic							
Cooperation and							
Development (OECD) Due							
Diligence Guidance for							
Responsible Supply Chains							
of Minerals from Conflict-							
Affected and High-Risk	2		N = 1 = 6 =		Did a st file		NI / A
Areas?	2 points	0	No information given	No information available	Did not file	N/A	N/A
c) Has the company							
disseminated its policy on							
conflict gold throughout							
the company, including to							
subsidiaries involved in the							
sourcing and sales of gold?		0	No information given	No information available	Did not file	N/A	N/A
d) Has the company	1 point		No information given				
provided interactive							
employee							
training on the policy?	1 point	0	No information given	No information available	Did not file	N/A	N/A
training on the policy:	1 point						
Section 2: Engagement							
with Suppliers (10)							
	L	I		1	1	1	1

JEWELRY TELEVISION	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
a) Has the company communicated its conflict							
gold policy to its suppliers							
(at minimum, 1st-tier							
suppliers)?	1 point	0	No information given	No information available	Did not file	N/A	N/A
by has the company	1 point	0	No information given			N/A	N/A
publicly committed itself							
to sourcing only from							
conflict-free refiners							
certified by the Conflict-							
Free Smelter program,							
London Bullion Market							
Association, or							
Responsible Jewellery							
Council (RJC), as conflict-							
free smelters become			_				
available? c) Has the company	3 points	0	No information given	No information available	Did not file	N/A	N/A
published the number of							
-							
refiners in its supply chain?	1 E pointe	0	No information given	No information available	Did not file	N/A	N/A
	1.5 points	0	No information given		Did not nie	N/A	N/A
d) Has the company							
published the names of its							
refiners in its supply							
chain?	1.5 points	0	No information given	No information available	Did not file	N/A	N/A
e) Has the company held							
meetings with its suppliers							
to develop strategies for							
	3 points: 2 for 1 meeting, 3						
from Congo?	for 2+ meetings	0	No information given	No information available	Did not file	N/A	N/A
Section 3: Participation in							
Initiatives to Help Build a							
Clean Gold Trade in Congo							
and the Great Lakes							
Region (9)							
a) Is the company a							
member of the Public							
Private Alliance for							
Responsible Minerals						http://www.resolv.org/site-	
Trade (PPA)?	3 points	0	No information given	No information available	Did not file	ppa/participation/	N/A

JEWELRY TELEVISION	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
b) Has the company							
attended the forums of the							
OECD Due Diligence							
Guidance for Responsible							
Supply Chains of Minerals							
from Conflict-Affected and	2 points: 1 for 1 forum, 2						
High-Risk Areas?	for multiple forums	0	No information given	No information available	Did not file	N/A	N/A
						http://www.responsibleje	
c) Is the company a						wellery.com/members/cer	
member of RJC or the						tified-members/	
Initiative for Responsible						http://www.responsiblemi	
Mining Assurance (IRMA)?	1 point	0	No information given	No information available	Did not file		N/A
d) Has the company been						http://www.responsibleje	
certified by the RJC Chain-						wellery.com/members/cha	
of-Custody Certification						in-of-custody-certified-	
program?	2 points	0	No information given	No information available	Did not file	entities/	N/A
e) Does the company	1 point: 1/2 for						
participate in the multi-	participation 1-2 times; an						
stakeholder group (MSG)	additional 1/2 for						No points were awarded
run by the Responsible	participation more than 2					http://www.sourcingnetw	on the basis of information
Sourcing Network?	times	0	No information given	No information available	Did not file	ork.org/partners/	provided by RSN.
Section 4: Commitment to							
Building a Clean Gold							
-							
Supply Chain in Congo and							
the Great Lakes Region							
(26)							

JEWELRY TELEVISION	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
a) Is the company		1					
participating in the		1					
Solutions for Hope Gold		1					
process, organized by		1					
Resolve, or an analogous		1					
initiative to source conflict-		1					
free gold from Congo?		1					
(For the Resolve process: 2		1					
points for committing to		1					
participate, 1 point for		1					
attending one or more							
meetings, 2 points for		1 1					
being a member of a							
working group. Points for		1					
an analogous process will		1					
be determined on the		1					
basis of information		1					
provided.)	5 points	0	No information given	No information available	Did not file	N/A	N/A
b) Is the company sourcing							
verifiably conflict-free gold		1					
from the Great Lakes	6 points: 4 for sourcing	1					
region of Africa (the	from the Great Lakes	1					
Democratic Republic of the		1					
Congo or any country	sourcing specifically from	1					
bordering)?	Congo	0	No information given	No information available	Did not file	N/A	N/A
	, j						
c) Is the company sourcing		1					
conflict-free gold		1					
specifically from the Kivu		1					
provinces of Congo?	11 points	0	No information given	No information available	Did not file	N/A	N/A
d) Does the company or							
company foundation		1 1					
support community-							
approved income		1 1					
generation and/or	4 points: 2 points for	1 1					
development projects for	support between \$20,000						
	and \$50,000, 4 points for						
mining communities in		0	No information given	No information available	Did not file	N/A	N/A
Congo's Kivu provinces? TOTAL	support above \$50,000 51		No information given	No information available		N/A	N/A
UTAL	51						l

MACY'S, INC.	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
Section 1: Company Policy							
(6)							
				"Macy's takes its obligations under Section			
				1502 of the Dodd-Frank Wall Street Reform			
				and Consumer Protection Act regarding			
				conflict minerals seriously. Macy's is			
				committed to ensuring that the metals and			
				other minerals contained in the private			
				brand products it sells are obtained,			
				produced, and used in a socially			
				responsible manner. Macy's does not			
				directly source conflict minerals from			
				mines, smelters or refiners, and is in most			
				cases several levels removed from these			
				market participants. Macy's therefore			
				requires the cooperation of its private label			
				suppliers in the implementation and			
				execution of its processes to comply with			
a) Does the company have				the ruleMacy's expects its suppliers to			
a policy articulating its				seek minerals from sources that do not			
commitment to ensuring				directly or indirectly contribute to the			
that its sourcing practices				conflict in the covered countries. Macy's			
do not support armed				reserves the right to request from any			
conflict				supplier at any time such information,			
and gross human rights				certifications, and documentation as it shall			
abuses (i.e., either a				deem necessary to monitor or assess		http://www.macysinc.com	
conflict minerals policy	2 points: 1 for making the			compliance with this policyMacy's seeks		/social-	
that explicitly covers gold,	policy publicly available;			to work with suppliers who will share its		responsibility/conflict-	
–	an additional 1 for making			commitment in working towards		minerals-	
covers conflict gold)?	the policy easily accessible	2	No information given	compliance with this policy."	No information available	policy/default.aspx	N/A
	the policy cashy accessible	2	No information given	compliance with this policy.			1/5
					"We designed our due diligence measures relating to Conflict Minerals		
					5		
					in general conformance with the		
h) Has the company					criteria set forth in the Organisation		
b) Has the company					for Economic Co-operation and		
committed to					Development's Due Diligence		
implementing					Guidance for Responsible Supply		
internationally-accepted					Chains of Minerals from Conflict-		
supply chain due diligence					Affected and High-Risk Areas,		
standards, such as the					including the Supplement on		
Organization for Economic					Tin, Tantalum and Tungsten and the		
Cooperation and					Supplement on Gold (Second Edition		
Development (OECD) Due					2013) (the 'OECD Guidance')We		
Diligence Guidance for					intend to take the following additional		
Responsible Supply Chains					steps to mitigate the risk that the	http://www.sec.gov/Archi	
of Minerals from Conflict-					necessary Conflict Minerals in our in-	ves/edgar/data/794367/00	
Affected and High-Risk					scope products benefit armed	0079436714000106/exhibi	
Areas?	2 points	2	No information given	No information available	groups."	<u>t102.htm</u>	N/A

MACY'S, INC.	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
c) Has the company disseminated its policy on conflict gold throughout the company, including to subsidiaries involved in					"We adopted a Conflict Minerals policy. We communicated the policy internally to impacted personnel by e- mail. The policy also was communicated by email to the Suppliers. In addition, the Conflict	http://www.macysinc.com /assets/docs/social- responsibility/Conflict Mi nerals Report.pdf http://www.sec.gov/Archi ves/edgar/data/794367/04	
the sourcing and sales of gold?	1 point	1	No information given	No information available	Minerals policy was posted on our website."	0079436714000106/exhibi t102.htm	N/A
d) Has the company provided interactive employee training on the policy?	1 point		No information given	No information available	"Senior management at both Macy's and Bloomingdale's, our merchants, our international general managers, our product development personnel and selected other internal personnel were educated on the Conflict Minerals Rule and our compliance plan."	http://www.sec.gov/Archi ves/edgar/data/794367/00 0079436714000106/exhibi	N/A
Section 2: Engagement							
with Suppliers (10)							
a) Has the company communicated its conflict gold policy to its suppliers (at minimum, 1st-tier suppliers)?	1 point	1	No information given	No information available	"We adopted a Conflict Minerals policy. We communicated the policy internally to impacted personnel by e- mail. The policy also was communicated by email to the Suppliers."	http://www.macysinc.com /assets/docs/social- responsibility/Conflict Mi nerals Report.pdf http://www.sec.gov/Archi ves/edgar/data/794367/00 0079436714000106/exhibi t102.htm	N/A
b) Has the company publicly committed itself to sourcing only from conflict-free refiners certified by the Conflict- Free Smelter program, London Bullion Market Association, or Responsible Jewellery Council (RJC), as conflict- free smelters become available?	3 points	0	No information given	No information available	No information available	N/A	N/A

MACY'S, INC.	Possible Points	Points Company Response	Available Information	SEC Filings	Relevant Links	Justification
c) Has the company published the number of refiners in its supply				"Suppliers indicating use of Conflict Minerals identified 25 smelters and/or refiners that may have been used to supply the Conflict Minerals contained in our in-scope products. Thirteen of the identified smelters and refiners were certified as conflict free by an independent third-party. The Suppliers reported the smelter and refiner information at a company, division or product category level and not at a product level. Therefore, we were unable to determine whether any of the identified smelters or	http://www.sec.gov/Archi ves/edgar/data/794367/00 0079436714000106/exhibi	Half credit was given because the company published the number of refiners but could not fully verify that these refiners
chain?	1.5 points	0.75 No information given	No information available	refiners were in our supply chain."	<u>t102.htm</u>	were in its supply chain.
d) Has the company published the names of its refiners in its supply chain?	1.5 points	0 No information given	No information available	No information available	N/A	N/A
e) Has the company held meetings with its suppliers to develop strategies for sourcing conflict-free gold from Congo?	3 points: 2 for 1 meeting, 3 for 2+ meetings	0 No information given	No information available	No information available	N/A	N/A
Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region (9)						
a) is the company a member of the Public Private Alliance for Responsible Minerals					http://www.resolv.org/site-	
Trade (PPA)? b) Has the company attended the forums of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and	3 points 2 points: 1 for 1 forum, 2	0 No information given	No information available	No information available	ppa/participation/	N/A
High-Risk Areas?	for multiple forums	0 No information given	No information available	No information available	N/A	N/A
c) Is the company a member of RIC or the Initiative for Responsible Mining Assurance (IRMA)?	1 point	0 No information given	No information available	No information available	http://www.responsibleje wellery.com/members/cer tified-members/; http://www.responsiblemi ning.net/participants/	N/A

N/A No points were awarded on the basis of information provided by RSN.
N/A No points were awarded on the basis of information provided by
N/A No points were awarded on the basis of information provided by
No points were awarded on the basis of information provided by
on the basis of information provided by
on the basis of information provided by
netw information provided by
RSN.
N/A
N/A
N/A

MACY'S, INC.	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
d) Does the company or							
company foundation							
support community-							
approved income							
generation and/or	4 points: 2 points for						
development projects for	support between \$20,000						
mining communities in	and \$50,000, 4 points for						
Congo's Kivu provinces?	support above \$50,000	0	No information given	No information available	No information available	N/A	N/A
TOTAL	51	7.75					

NEIMAN MARCUS	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
Section 1: Company Policy							
(6)							
						http://phx.corporate-	
						ir.net/External.File?item=U	
a) Does the company have						GFyZW50SUQ9NTcwN3xD	
a policy articulating its						aGIsZEIEPS0xfFR5cGU9Mw	
commitment to ensuring						==&t=1	
that its sourcing practices						http://plix.corporate-	
do not support armed						ir.net/External.File?item=U	The Code of Ethics passed
conflict						GFyZW50SUQ9NTcwN3xD	in 2013 does not address
and gross human rights						aGIsZEIEPS0xfFR5cGU9Mw	the issue of conflict
abuses (i.e., either a						<u>==&t=1 ;</u>	minerals. The SEC filing
	2 points: 1 for making the						also does not mention a
	policy publicly available;						company policy on conflict
	an additional 1 for making						minerals. (See Relevant
covers conflict gold)?	the policy easily accessible	0	No information given	No information available	No information available	13408 1sd.htm	Links)
b) Has the company							
committed to							
implementing							
internationally-accepted							
supply chain due diligence							
standards, such as the							
Organization for Economic							
Cooperation and							
Development (OECD) Due							
Diligence Guidance for							
Responsible Supply Chains							
of Minerals from Conflict-							
Affected and High-Risk							
Areas?	2 points	0	No information given	No information available	No information available	N/A	N/A

NEIMAN MARCUS	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
c) Has the company							
disseminated its policy on							
conflict gold throughout							
the company, including to							
subsidiaries involved in the							
sourcing and sales of gold?	1 point	0	No information given	No information available	No information available	N/A	N/A
d) Has the company							
provided interactive employee							
training on the policy?	1 point	0	No information given	No information available	No information available	N/A	N/A
training on the policy?		0	NO INFORMATION GIVEN			IN/A	N/A
Section 2: Engagement							
with Suppliers (10)							
a) Has the company communicated its conflict							
gold policy to its suppliers							
(at minimum, 1st-tier							
suppliers)?	1 point	0	No information given	No information available	No information available	N/A	N/A
b) Has the company							
publicly committed itself							
to sourcing only from							
conflict-free refiners							
certified by the Conflict-							
Free Smelter program,							
London Bullion Market							
Association, or							
Responsible Jewellery							
Council (RJC), as conflict-							
free smelters become							
available?	3 points	0	No information given	No information available	No information available	N/A	N/A
					fifty-seven (57) of its		The company identified 57
					vendors/suppliers who are		suppliers who filled out
c) Has the company					required to complete the	http://www.sec.gov/Archi	the conflict minerals
published the number of					Template and Certification	ves/edgar/data/1358651/0	template, but the
refiners in its supply			_	_	process outlined in 1.4	00110465914042656/a14-	company did not publish
chain?	1.5 points	0	No information given	No information available	above."	<u>13408 1sd.htm</u>	its list of refiners.
d) Has the company							
published the names of its							
refiners in its supply							
chain?	1.5 points	0	No information given	No information available	No information available	N/A	N/A

NEIMAN MARCUS	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
e) Has the company held							
meetings with its suppliers							
to develop strategies for							
sourcing conflict-free gold	3 points: 2 for 1 meeting, 3	0	No information since			N1/A	NI / A
from Congo?	for 2+ meetings	0	No information given	No information available	No information available	N/A	N/A
Section 3: Participation in							
Initiatives to Help Build a							
Clean Gold Trade in Congo							
and the Great Lakes							
Region (9)							
a) Is the company a							
member of the Public							
Private Alliance for							
Responsible Minerals						http://www.resolv.org/site-	
Trade (PPA)?	3 points	0	No information given	No information available	No information available	ppa/participation/	N/A
b) Has the company							
attended the forums of the							
OECD Due Diligence							
Guidance for Responsible							
Supply Chains of Minerals							
from Conflict-Affected and	2 points: 1 for 1 forum, 2						
High-Risk Areas?	for multiple forums	0	No information given	No information available	No information available	N/A	N/A
						http://www.responsibleje	
c) Is the company a						wellery.com/members/cer	
member of RJC or the						tified-members/	
Initiative for Responsible						http://www.responsiblemi	
Mining Assurance (IRMA)?	1 point	0	No information given	No information available	No information available		N/A
d) Has the company been						http://www.responsibleje	
certified by the RJC Chain-						wellery.com/members/cha	
of-Custody Certification		-				in-of-custody-certified-	
program? e) Does the company	2 points 1 point: 1/2 for	0	No information given	No information available	No information available	entities/	N/A
participate in the multi-	participation 1-2 times; an						
	· · ·						No pointe wore owerded
stakeholder group (MSG)	additional 1/2 for						No points were awarded on the basis of information
run by the Responsible	participation more than 2		No information divor-			N1/A	
Sourcing Network?	times	0	No information given	No information available	No information available	N/A	provided by RSN.
Section 4: Commitment to							
Building a Clean Gold							
Supply Chain in Congo and							
the Great Lakes Region							
(26)							
(==)			1				

NEIMAN MARCUS	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
a) Is the company							
participating in the							
Solutions for Hope Gold							
process, organized by							
Resolve, or an analogous							
initiative to source conflict-							
free gold from Congo?							
(For the Resolve process: 2							
points for committing to							
participate, 1 point for							
attending one or more							
meetings, 2 points for							
being a member of a							
working group. Points for							
an analogous process will							
be determined on the							
basis of information							
provided.)	5 points	0	No information given	No information available	No information available	N/A	N/A
b) Is the company sourcing							
verifiably conflict-free gold							
from the Great Lakes	6 points: 4 for sourcing						
region of Africa (the	from the Great Lakes						
Democratic Republic of the							
Congo or any country	sourcing specifically from						
bordering)?	Congo	0	No information given	No information available	No information available	N/A	N/A
	-						
c) Is the company sourcing							
conflict-free gold							
specifically from the Kivu			_				
provinces of Congo?	11 points	0	No information given	No information available	No information available	N/A	N/A
d) Does the company or							
company foundation							
support community-							
approved income							
generation and/or	4 points: 2 points for						
development projects for	support between \$20,000						
mining communities in	and \$50,000, 4 points for						
Congo's Kivu provinces?	support above \$50,000	0	No information given	No information available	No information available	N/A	N/A
TOTAL	51						

QVC, INC.	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
Section 1: Company Policy							
(6)							
				"We support the			
				humanitarian goals of the			
				U.S. Conflict Minerals Rule,			
				which seeks to address			
				concerns that trade in			
				certain minerals in the			
				Democratic Republic of the			
				Congo and surrounding			
				countries may be used to			
				finance armed groups			
				engaged in human rights			
a) Does the company have				abusesQVC does not			
a policy articulating its				directly source any 3TG			
commitment to ensuring				from mines, smelters, or			
that its sourcing practices				refiners, and is in most			
do not support armed				cases many levels removed			
conflict				from these market			
and gross human rights				participants. We,			
abuses (i.e., either a				therefore, require the			
conflict minerals policy	2 points: 1 for making the			cooperation of our			
that explicitly covers gold,	policy publicly available;			suppliers with this policy to		http://www.gvc.com/QVC	
or a policy that specifically	an additional 1 for making			enable us to meet our SEC		ConflictMineralsPolicy.con	
covers conflict gold)?	the policy easily accessible	2	No information given	compliance obligations."	No information available	tent.html	N/A
, , , , , , , , , , , , , , , , , , ,			Ĭ		"We designed our due diligence		
					measures relating to 3TG to conform		
					with, in all material respects, the		
					criteria set forth in the Organisation for		
					Economic Co-operation and		
					Development's Due Diligence Guidance		
b) Has the company					for Responsible Supply Chains of		
committed to					Minerals from Conflict-Affected and		
implementing					High-Risk Areas, including the		
internationally-accepted					Supplement on Tin, Tantalum and		
supply chain due diligence					Tungsten and the Supplement on Gold		
standards, such as the					(Second Edition 2013) (the 'OECD		
Organization for Economic					Guidance') (from form SD) We intend		
Cooperation and					to take the following additional steps		
Development (OECD) Due					on in-scope products for 2014 to		
Diligence Guidance for					mitigate the risk that the 3TG		
Responsible Supply Chains					contained in and necessary to the	http://www.sec.gov/Archi	
of Minerals from Conflict-					products we manufacture or contract	ves/edgar/data/1254699/0	
Affected and High-Risk					to manufacture benefits armed groups	00110465914043237/a14-	
Areas?	2 points	2	No information given	No information available	in the DRC Region."	14505 1ex1d02.htm	N/A

QVC, INC.	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
					"We communicated the Conflict		
					Minerals Policy in writing to selected		
					personnel from senior management,		
					legal, accounting, internal audit,		
					compliance, product management,		
					project management, and		
c) Has the company					merchandising. We established a		
disseminated its policy on					mechanism for employees, suppliers		
conflict gold throughout					and other interested parties to report	http://www.sec.gov/Archi	
the company, including to					concerns regarding, or suspected	ves/edgar/data/1254699/0	
subsidiaries involved in the					violations of, the Conflict Minerals	00110465914043237/a14-	
sourcing and sales of gold?	1 point	1	No information given	No information available	Policy."	14505 1ex1d02.htm	N/A
					"We created an internal team to draft a		
					policy regarding the supply of 3TG for		
					products that we manufacture or		
					contract to manufacture, and to		
					initiate and implement our 3TG		
					compliance strategy (the 'Conflict		
					Minerals Working Group'). The		
					following internal functional areas		
					were represented on the Conflict		
					Minerals Working Group: legal; project		
					management; merchandising; and		
					internal audit. The Conflict Minerals		
					Working Group and selected members		
					of senior management were educated		
					on the Conflict Minerals Rule, the		
					OECD Guidance, our compliance plan		
					and the procedures for reviewing and		
					validating supplier responses to our		
					inquiries. We also worked with		
					specialist outside counsel and other		
d) Has the company					consultants retained by our parent	http://www.sec.gov/Archi	
provided interactive					company, Liberty Interactive	ves/edgar/data/1254699/0	
employee					Corporation ('Liberty'), to assist us with	00110465914043237/a14-	
training on the policy?	1 point	1	No information given	No information available	our compliance efforts."	14505 1ex1d02.htm	N/A
Section 2: Engagement							
with Suppliers (10)							
a) Has the company						http://www.coc.co./Ac-bi	
communicated its conflict						http://www.sec.gov/Archi	
gold policy to its suppliers					"The Conflict Minerals Policy also was	ves/edgar/data/1254699/0	
(at minimum, 1st-tier suppliers)?	1 point	1	No information given	No information available	communicated in writing to Suppliers, and posted on our website."	00110465914043237/a14- 14505 1ex1d02.htm	N/A
suppliers):	1 hourt	1	no mormation given	No information available	and posted on our website.	14505 10X1002.000	NA

QVC, INC.	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
 b) Has the company 							
publicly committed itself							
to sourcing only from							
conflict-free refiners							
certified by the Conflict-							
Free Smelter program,							
London Bullion Market							
Association, or							
Responsible Jewellery							
Council (RJC), as conflict-							
free smelters become							
available?	3 points	0	No information given	No information available	No information available	N/A	N/A
						http://www.sec.gov/Archi	
c) Has the company						ves/edgar/data/1254699/0	
published the number of						00110465914043237/a14-	
•	1 E pointe	1 5	No information dison	No information available	Cool short on ng. C of CEC filing	14505 1ex1d02.htm	N/A
refiners in its supply chain?	1.5 points	1.5	No information given	No information available	See chart on pg. 6 of SEC filing	14505 1ex1002.ntm	N/A
						http://www.sec.gov/Archi	
d) Has the company						ves/edgar/data/1254699/0	
published the names of its						00110465914043237/a14-	
refiners in its supply chain?	1.5 points	1.5	No information given	No information available	See chart on pg. 6 of SEC filing	14505 1ex1d02.htm	N/A
e) Has the company held							
meetings with its suppliers							
to develop strategies for sourcing conflict-free gold	3 points: 2 for 1 meeting, 3						
с с			No information dison	No information available	No information available	N/A	N/A
from Congo?	for 2+ meetings	0	No information given			N/A	IN/A
Section 3: Participation in							
Initiatives to Help Build a							
Clean Gold Trade in Congo							
and the Great Lakes							
Region (9)							
a) Is the company a							
member of the Public							
Private Alliance for							
Responsible Minerals						http://www.resolv.org/site-	
Trade (PPA)?	3 points	0	No information given	No information available	No information available	ppa/participation/	N/A
b) Has the company							
attended the forums of the							
OECD Due Diligence							
Guidance for Responsible							
Supply Chains of Minerals							
from Conflict-Affected and	2 points: 1 for 1 forum, 2						
High-Risk Areas?	for multiple forums	0	No information given	No information available	No information available	N/A	N/A

QVC, INC.	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
						http://www.responsibleje	
c) Is the company a						wellery.com/members/cer	
member of RJC or the						tified-members/	
Initiative for Responsible						http://www.responsiblemi	
Mining Assurance (IRMA)?	1 point	0	No information given	No information available	No information available	ning.net/participants/	N/A
d) Has the company been			Ū			http://www.responsibleje	
certified by the RJC Chain-						wellery.com/members/cha	
of-Custody Certification						in-of-custody-certified-	
program?	2 points	0	No information given	No information available	No information available	entities/	N/A
e) Does the company	1 point: 1/2 for						
participate in the multi-	participation 1-2 times; an						N
stakeholder group (MSG)	additional 1/2 for						No points were awarded
run by the Responsible	participation more than 2	0		No. information and table			on the basis of information
Sourcing Network?	times	0	No information given	No information available	No information available	ork.org/partners/	provided by RSN.
Section 4: Commitment to							
Building a Clean Gold							
Supply Chain in Congo and							
the Great Lakes Region							
(26)							
a) Is the company							
participating in the							
Solutions for Hope Gold							
process, organized by							
Resolve, or an analogous							
initiative to source conflict-							
free gold from Congo?							
(For the Resolve process: 2							
points for committing to							
participate, 1 point for							
attending one or more							
meetings, 2 points for							
being a member of a							
working group. Points for							
an analogous process will							
be determined on the							
basis of information							
provided.)	5 points	0	No information given	No information available	No information available	N/A	N/A
b) Is the company sourcing							
verifiably conflict-free gold							
from the Great Lakes	6 points: 4 for sourcing						
region of Africa (the	from the Great Lakes						
Democratic Republic of the	region, 2 additional for						
Congo or any country	sourcing specifically from						
bordering)?	Congo	0	No information given	No information available	No information available	N/A	N/A

QVC, INC.	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
c) Is the company sourcing							
conflict-free gold							
specifically from the Kivu							
provinces of Congo?	11 points	0	No information given	No information available	No information available	N/A	N/A
d) Does the company or							
company foundation							
support community-							
approved income							
generation and/or	4 points: 2 points for						
development projects for	support between \$20,000						
mining communities in	and \$50,000, 4 points for						
Congo's Kivu provinces?	support above \$50,000	0	No information given	No information available	No information available	N/A	N/A
TOTAL	51	10					

ROSS-SIMONS	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
Section 1: Company Policy							
(6)							
a) Does the company have							
a policy articulating its							
commitment to ensuring							
that its sourcing practices							
do not support armed							
conflict							
and gross human rights							
abuses (i.e., either a							
	2 points: 1 for making the						
	policy publicly available;						
or a policy that specifically							
	the policy easily accessible	0	No information given	No information available	Did not file	N/A	N/A
	the policy cashy accessible	0	in a manual on Bren				,.
b) Has the company							
committed to							
implementing							
internationally-accepted							
supply chain due diligence							
standards, such as the							
Organization for Economic							
Cooperation and							
Development (OECD) Due							
Diligence Guidance for							
Responsible Supply Chains							
of Minerals from Conflict-							
Affected and High-Risk	a						
Areas?	2 points	0	No information given	No information available	Did not file	N/A	N/A
c) Has the company							
disseminated its policy on							
conflict gold throughout							
the company, including to							
subsidiaries involved in the							
sourcing and sales of gold?		0	No information given	No information available	Did not file	N/A	N/A
d) Has the company			0				
provided interactive							
employee							
training on the policy?	1 point	0	No information given	No information available	Did not file	N/A	N/A
Section 2: Engagement							
with Suppliers (10)							

ROSS-SIMONS	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
a) Has the company							
communicated its conflict							
gold policy to its suppliers							
(at minimum, 1st-tier							
suppliers)?	1 point	0	No information given	No information available	Did not file	N/A	N/A
b) Has the company	· ·						-
publicly committed itself							
to sourcing only from							
conflict-free refiners							
certified by the Conflict-							
Free Smelter program,							
London Bullion Market							
Association, or							
Responsible Jewellery							
Council (RJC), as conflict-							
free smelters become							
available?	3 points	0	No information given	No information available	Did not file	N/A	N/A
c) Has the company							
published the number of							
refiners in its supply							
chain?	1.5 points	0	No information given	No information available	Did not file	N/A	N/A
d) Has the company							
published the names of its							
refiners in its supply							
	1.5 points	0	No information given	No information available	Did not file	N/A	N/A
e) Has the company held							
meetings with its suppliers							
to develop strategies for							
	3 points: 2 for 1 meeting, 3						
from Congo?	for 2+ meetings	0	No information given	No information available	Did not file	N/A	N/A
Section 3: Participation in							
Initiatives to Help Build a							
Clean Gold Trade in Congo							
and the Great Lakes							
Region (9) a) Is the company a							
member of the Public							
Private Alliance for							
Responsible Minerals						http://www.resolv.org/site	
Trade (PPA)?	3 points	0	No information given	No information available	Did not file		N/A
Traue (PPA)!	5 points	0	no mormation given	NO INFORMATION AVAILABLE			N/A

ROSS-SIMONS	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
b) Has the company							
attended the forums of the							
OECD Due Diligence							
Guidance for Responsible							
Supply Chains of Minerals							
from Conflict-Affected and	2 points: 1 for 1 forum, 2						
High-Risk Areas?	for multiple forums	0	No information given	No information available	Did not file	N/A	N/A
						http://www.responsibleje	
c) Is the company a						wellery.com/members/cer	
member of RJC or the						tified-members/	
Initiative for Responsible						http://www.responsiblemi	
Mining Assurance (IRMA)?	1 point	0	No information given	No information available	Did not file	ning.net/participants/	N/A
d) Has the company been						http://www.responsibleje	
certified by the RJC Chain-						wellery.com/members/cha	
of-Custody Certification						in-of-custody-certified-	
program?	2 points	0	No information given	No information available	Did not file	entities/	N/A
e) Does the company	1 point: 1/2 for						
participate in the multi-	participation 1-2 times; an						
stakeholder group (MSG)	additional 1/2 for						No points were awarded
run by the Responsible	participation more than 2						on the basis of information
Sourcing Network?	times	0	No information given	No information available	Did not file	ork.org/partners/	provided by RSN.
Section 4: Commitment to							
Building a Clean Gold							
Supply Chain in Congo and							
the Great Lakes Region							
(26)							

ROSS-SIMONS	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
a) Is the company							
participating in the							
Solutions for Hope Gold							
process, organized by							
Resolve, or an analogous							
initiative to source conflict-							
free gold from Congo?							
(For the Resolve process: 2							
points for committing to							
participate, 1 point for							
attending one or more							
meetings, 2 points for							
being a member of a							
working group. Points for							
an analogous process will							
be determined on the							
basis of information							
provided.)	5 points	0	No information given	No information available	Did not file	N/A	N/A
b) Is the company sourcing							
verifiably conflict-free gold							
from the Great Lakes	6 points: 4 for sourcing						
region of Africa (the	from the Great Lakes						
Democratic Republic of the	region, 2 additional for						
Congo or any country	sourcing specifically from						
bordering)?	Congo	0	No information given	No information available	Did not file	N/A	N/A
c) Is the company sourcing							
conflict-free gold							
specifically from the Kivu							
provinces of Congo?	11 points	0	No information given	No information available	Did not file	N/A	N/A
d) Does the company or							
company foundation							
support community-							
approved income							
generation and/or	4 points: 2 points for						
	support between \$20,000						
	and \$50,000, 4 points for						
Congo's Kivu provinces?	support above \$50,000	0	No information given	No information available	Did not file	N/A	N/A
TOTAL	51						

SEARS HOLDINGS	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
Section 1: Company Policy							
(6)							
				"Sears Holdings is			
				committed to ensuring			
				that all tin, tungsten,			
				tantalum and gold			
				('Conflict Minerals')			
				contained in our private			
a) Does the company have				label and exclusive			
a policy articulating its				products are obtained in a			
commitment to ensuring				socially responsible			
that its sourcing practices				manner. As such, we are			
do not support armed				working to implement and			No points were awarded
conflict				ensure compliance with			as the company's policy
and gross human rights				Section 1502 of the Dodd-			only requires that products
abuses (i.e., either a				Frank Street Reform and			be obtained in a "socially
	2 points: 1 for making the			Consumer Protection Act,			responsible manner" and
	policy publicly available;			enacted by Congress in			does not go so far as to
or a policy that specifically				2010, related to trade in		com/compliance/conflict-	cover armed conflict or
covers conflict gold)?	the policy easily accessible	0	No information given	Conflict Minerals."	No information available	minerals/	gross human rights abuses.
b) Has the company							
committed to					"The Domestic Operating		
implementing					Companies' due diligence		
internationally-accepted					framework was designed		
supply chain due diligence standards, such as the					in conformance with the Organization for Economic		
Organization for Economic					Cooperation and		Half credit was given
Cooperation and					Development's ('OECD')		because the company
Development (OECD) Due					Due Diligence Guidance for	http://www.searsholdings.	designed its due diligence
Diligence Guidance for					Responsible Supply Chains	com/compliance/conflict-	framework in conformance
Responsible Supply Chains					of Minerals from Conflict-	minerals/ http://www.sec.gov/Archi	with the OECD guidance
of Minerals from Conflict-					Affected and High-Risk		but did not commit to
Affected and High-Risk					Areas and accompanying		implementing the OECD
-	2 points	1	No information given	No information available	Supplements."		guidance in the future.
Areas?	2 points	1	No information given	NO INFORMATION AVAILABLE	supplements.	USSUEXIUZ.IIIII	guiuance in the future.

SEARS HOLDINGS	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
A the the second second							
c) Has the company							
disseminated its policy on							
conflict gold throughout							
the company, including to							
subsidiaries involved in the							
sourcing and sales of gold? d) Has the company	1 point	0	No information given	No information available	No information available	N/A	N/A
provided interactive							
employee							
training on the policy?	1 point	0	No information given	No information available	No information available	N/A	N/A
training on the policy:	1 point	0	No mormation given			N/A	N/A
Section 2: Engagement							
with Suppliers (10)							
					-Introductory emails were		
					sent to Tier 1 Suppliers		
					describing the compliance		
					requirements and		
					requesting conflict		
					minerals information.		
					Suppliers were also		
					provided access to		
					training.		
					-Following the initial		
					introductions, up to three		
					reminder emails were sent		
					to each non-responsive		
					Supplier requesting that		
					the EICC-GeSI Template be		
					completed.		
					-Suppliers who remained		
					non-responsive to these		
					email reminders were		
					contacted by phone and		
					offered assistance. This		
					assistance included, but		
					was not limited to, further		No points were awarded
					information about the		because, while this
					Domestic Operating		supplier communication
					Companies Conflict		was excellent, it did not
a) Has the company					Minerals Compliance		appear to relate directly to
communicated its conflict					Program, an explanation of		the policy. Clarification
gold policy to its suppliers					why the information was		was sought from Sears but
(at minimum, 1st-tier					being collected, a review	00119312514221945/d735	
suppliers)?	1 point	0	No information given	No information available	of how the information	055dex102.htm	respond.

SEARS HOLDINGS	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
h) Has the company							
 b) Has the company publicly committed itself 							
to sourcing only from							
conflict-free refiners							
certified by the Conflict-							
Free Smelter program,							
London Bullion Market							
Association, or							
Responsible Jewellery							
Council (RJC), as conflict-						http://www.conflictfreeso	
free smelters become						urcing.org/about/member	
available?	3 points	0	No information given	No information available	No information available		N/A
c) Has the company							
published the number of							
refiners in its supply							
chain?	1.5 points	0	No information given	No information available	No information available	N/A	N/A
d) Has the company							
published the names of its							
refiners in its supply							
chain?	1.5 points	0	No information given	No information available	No information available	N/A	N/A
	1.5 points	0	No mornation given				
e) Has the company held							
meetings with its suppliers							
to develop strategies for							
sourcing conflict-free gold	3 points: 2 for 1 meeting, 3						
from Congo?	for 2+ meetings	0	No information given	No information available	No information available	N/A	N/A
Section 3: Participation in							
Initiatives to Help Build a							
Clean Gold Trade in Congo							
and the Great Lakes							
Region (9)							
a) Is the company a							
member of the Public							
Private Alliance for						http://www.resolv.org/site-	
Responsible Minerals Trade (PPA)?	3 points	0	No information given	No information available	No information available		N/A
		0				<u>ppa/pdftlClpdtlOll/</u>	N/ A
b) Has the company							
attended the forums of the							
OECD Due Diligence							
Guidance for Responsible							
Supply Chains of Minerals							
from Conflict-Affected and	2 points: 1 for 1 forum, 2						
High-Risk Areas?	for multiple forums	0	No information given	No information available	No information available	N/A	N/A

SEARS HOLDINGS	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
						http://www.responsibleje	
c) Is the company a						wellery.com/members/cer	
member of RJC or the						tified-members/	
Initiative for Responsible	.					http://www.responsiblemi	
Mining Assurance (IRMA)? d) Has the company been	1 point	0	No information given	No information available	No information available	ning.net/participants/ http://www.responsibleje	N/A
certified by the RJC Chain-						wellery.com/members/cha	
of-Custody Certification						in-of-custody-certified-	
program?	2 points	0	No information given	No information available	No information available		N/A
	1 point: 1/2 for	0	No mornation given			citities	
participate in the multi-	participation 1-2 times; an						
	additional 1/2 for						
	participation more than 2					http://www.sourcingnetw	
Sourcing Network?	times	0	No information given	No information available	No information available	ork.org/partners/	N/A
Section 4: Commitment to							
Building a Clean Gold							
Supply Chain in Congo and							
the Great Lakes Region							
(26)							
a) Is the company							
participating in the							
Solutions for Hope Gold							
process, organized by							
Resolve, or an analogous							
initiative to source conflict-							
free gold from Congo?							
(For the Resolve process: 2							
points for committing to							
participate, 1 point for							
attending one or more							
meetings, 2 points for							
being a member of a							
working group. Points for							
an analogous process will							
be determined on the							
basis of information							
provided.)	5 points	0	No information given	No information available	No information available	N/A	N/A

SEARS HOLDINGS	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
	6 points: 4 for sourcing from the Great Lakes						
	sourcing specifically from			No. information and held	No. 1. Compatible and the late	N1/A	N1 / A
bordering)?	Congo	0	No information given	No information available	No information available	N/A	N/A
c) Is the company sourcing conflict-free gold specifically from the Kivu provinces of Congo?	11 points	0	No information given	No information available	No information available	N/A	N/A
d) Does the company or company foundation support community- approved income generation and/or	4 points: 2 points for						
development projects for	support between \$20,000						No points were awarded
mining communities in	and \$50,000, 4 points for						on the basis of information
Congo's Kivu provinces?	support above \$50,000	0	No information given	No information available	No information available	N/A	provided by RSN.
TOTAL	51	1					

			Company				
SIGNET JEWELERS	Possible Points	Points	Response	Available Information	SEC Filings	Relevant Links	Justification
Section 1: Company Policy			•				
(6)							
				"Signet Jewelers Limited and our US and UK operations (Signet) are fully			
				committed to the responsible sourcing of our products and the respect			
				of human rights, and we expect the same from our suppliers around the			
				world. We continually strive to assure our customers, employees,			
				investors and other stakeholders that our supply chain avoids action			
				that may directly or indirectly finance armed conflict and serious human			
				rights violations around the world including the Democratic Republic of			
				Congo and its adjoining countries.			
				Signet has been at the forefront of responsible sourcing in the jewelry			
				supply chain. Signet is a founding and certified member of the			
				Responsible Jewellery Council (RJC), an organization that is committed			
				to promoting responsible ethical, human rights, social and			
				environmental practices throughout the jewelry supply chain. As a			
				founding member and active participant, we fully support the RJC's	"As reflected in the		
				membership Code of Practices and Chain of Custody standards.	Conflict Minerals Policy,		
					Signet is fully committed		
				Signet is also active in cross-sector coalitions and working groups that	to the responsible sourcing		
				reach beyond the jewelry industry to ensure that companies respect	of its products and the		
				human rights and avoid contributing to armed conflict. Signet supports	respect of human rights,		
				the Organisation for Economic Cooperation and Development (OECD)	and Signet expects the		
				due diligence guidelines supplement for gold, the London Bullion	same from its suppliers		
				Market Association (LBMA) Responsible Gold Guidance, and the Dodd-	around the world. Signet	http://www.signetie	
				Frank Wall Street Reform and Consumer Protection Act, Section 1502,	continually strives to	welers.com/corpora	
a) Does the company have				relating to our supplies of gold.	assure its customers,		
a policy articulating its					employees, investors and	<u>te-</u> responsibility/respo	
commitment to ensuring				Based on these international standards and guidance, Signet conducted	other stakeholders that its	nsible-sourcing/	
that its sourcing practices				extensive research and consulted with many of our suppliers to develop	supply chain avoids action		
do not support armed	2 points: 1 for			the Signet Responsible Sourcing Protocol ('SRSP'). The purpose of the	that may directly or		
conflict	making the			SRSP is to outline practical procedures that will reasonably ensure any	indirectly finance armed		
and gross human rights	policy publicly			gold, tin, tantalum, or tungsten, defined as 'conflict minerals' by OECD	conflict and serious human		
abuses (i.e., either a	available; an			and the SEC, in products supplied to Signet are recognized as conflict-	rights violations around	http://www.sec.gov	
conflict minerals policy	additional 1 for			free (see SRSP for conflict-free gold and SRSP for conflict-free 3Ts). The	the world, including in	/Archives/edgar/dat	
that explicitly covers gold,	making the			SRSP is established as company policy effective 1/1/2013 and requires	particular the Democratic	a/832988/00011931	
or a policy that specifically	policy easily			all suppliers to certify and independently verify that supplies to Signet	Republic of Congo and its	<u>2514218377/d7340</u>	
covers conflict gold)?	accessible	2	"Yes"	are compliant with the SRSP."	adjoining countries."	28dex102.htm	N/A

			Company				
SIGNET JEWELERS	Possible Points	Points	Response	Available Information	SEC Filings	Relevant Links	Justification
b) Has the company committed to implementing internationally-accepted supply chain due diligence standards, such as the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-				"Signet supports the Organisation for Economic Cooperation and Development (OECD) due diligence guidelines supplement for gold, the London Bullion Market Association (LBMA) Responsible Gold Guidance,	"An independent auditor stated, 'We are satisfied that the design of Signet's due diligence framework, as described in their Conflict Minerals Report section 2A) is in conformity with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High-Risk	http://www.signetje welers.com/corpora te- responsibility/respo nsible-sourcing/	In addition to the available information, Signet Jewelers receive full credit for committing to implement OECD Due Dilligence Guidelines based on Enough Project observations of public presentations by
	2 points	2	"Yes" "[Yes]; through regular team				presentations by Signet representatives.
conflict gold throughout the company, including to subsidiaries involved in the sourcing and sales of gold?	1 point	1	meetings, emails, and company briefings."	No information available	No information available	N/A	N/A
d) Has the company provided interactive employee					"[Signet devised and adopted] a risk management plan, which includes:facilitating training and education for suppliers and other stakeholders on the SRSPs and other due diligence	http://edgar.sec.gov /Archives/edgar/dat a/832988/00011931 2514218377/d7340	
training on the policy? Section 2: Engagement with Suppliers (10)	1 point		"Yes"	No information available	measures"	<u>28dex102.htm</u>	N/A

			Company				
SIGNET JEWELERS	Possible Points	Points	Response	Available Information	SEC Filings	Relevant Links	Justification
			-				
					"Signet designed and		
					implemented strategies to		
					respond to Conflict		
					Minerals risks identified by		
					verifying that smelters and		
					refineries in Signet's supply		
					chain that source 3TG from		
					the Covered Countries are		
					certified as 'conflict free'		
					under established		
					international guidance and		
					standards, such as the		
					LBMA's Responsible Gold	http://www.signetje	
					Guidance and Good	welers.com/files/do	
					Delivery List, and the	c downloads/Signet-	
					Conflict-Free Smelter List	Responsible-	
				"The Signet Responsible Sourcing Protocol ('SRSP') is a guide for	published by the CFSI (see	Sourcing-Protocol-	
				Signet's suppliers to ensure that gold provided to Signet is	sections 2.B.1a and 2.B.2a	for-Gold-revised-	
				conflict–free. The requirements in the SRSP apply to all gold products	below). These strategies	September-2013.pdf	
				(finished and components), and to all products containing gold, with the	also include: facilitating		
a) Has the company			"[Yes]; by		training and education for	http://www.sec.gov	
communicated its conflict			email,	to Signet, either by certification of all gold manufacture and supply, or,	suppliers and other	/Archives/edgar/dat	
gold policy to its suppliers			webinars,	if this is not possible, by segregating manufacture and supply of	stakeholders on the SRSPs	a/832988/00011931	
(at minimum, 1st-tier	a		phone,	gold to Signet from manufacture and supply of gold to other	and other due diligence	2514218377/d7340	NI (A
suppliers)?	1 point	1	visits."	customers."	measures"	28dex102.htm	N/A
b) Has the company							
publicly committed itself			"[Yes]; not				
to sourcing only from			exclusively				
conflict-free refiners			these three,				
certified by the Conflict-			but amongst				Points were not
Free Smelter program,			other				awarded because
London Bullion Market			certified				the company's
Association, or Responsible			sources not				commitment was
Jewellery Council (RJC), as			stated by The				not exclusively to
conflict-free smelters		_	Enough	No. 1. Comparison of the late			the three aligned
become available?	3 points	0	Project."	No information available	No information available	28dex102.htm	audits listed.

SIGNET JEWELERS	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
		1 01110	Response				Justinication
c) Has the company							
published the number of	1 E points	0	"No"	No information available	No information available	N/A	N/A
refiners in its supply chain?	1.5 points	0	NO		No information available	N/A	N/A
d) Has the company							
published the names of its							
refiners in its supply chain?	1.5 points	0	"No"	No information available	No information available	N/A	N/A
			"[Yes]; in our				
			regular				
			briefings with				
			suppliers, we				
			have				
			positively				
			advocated				
			sourcing				
			from				
			'covered				
			countries'				
			providing in				
			those				
e) Has the company held			sources are				
meetings with its suppliers			certified and				
to develop strategies for	3 points: 2 for 1		consistent				
	meeting, 3 for 2+		with our				
from Congo?	meetings	3	protocols."	No information available	No information available	N/A	N/A
Section 3: Participation in							
Initiatives to Help Build a							
Clean Gold Trade in Congo							
and the Great Lakes							
Region (9)							
a) Is the company a							
member of the Public						https://www.secol	
Private Alliance for						http://www.resolv.o	
Responsible Minerals Trade (PPA)?	3 points	0	"No"	No information available	No information available	<u>rg/site-</u> ppa/participation/	N/A
	5 points	0				ppu/purticipation/	
b) Has the company							
attended the forums of the							
OECD Due Diligence							Based on Enough
Guidance for Responsible							Project
	2 points: 1 for 1						knowledge and
	forum, 2 for						attendence of
High-Risk Areas?	multiple forums	2	"Yes"	Yes, multiple.	No information available	N/A	OECD forums.

			Company				
SIGNET JEWELERS	Possible Points	Points	Response	Available Information	SEC Filings	Relevant Links	Justification
c) Is the company a member of RJC or the Initiative for Responsible Mining Assurance (IRMA)?	1 point	1	"Yes"	"Signet is a founding and certified member of the Responsible Jewellery Council (RJC)Signet fully supports the RJC's membership Code of Practices and Chain of Custody standards."	No information available	http://www.respons iblejewellery.com/m embers/certified- members/ http://www.signetje welers.com/corpora te- responsibility/respo nsible-sourcing/	N/A
d) Has the company been certified by the RJC Chain- of-Custody Certification program?	2 points	0	<u>"No"</u>	"Signet fully supports the RJC's membership Code of Practices and Chain of Custody standards."	N/A	http://www.signetje welers.com/corpora te- responsibility/respo nsible-sourcing/ http://www.respons iblejewellery.com/m embers/chain-of- custody-certified- entities/	It is laudable that Signet is a founding member of RJC. We would welcome Signet's CoC certification in RJC.
e) Does the company participate in the multi- stakeholder group (MSG) run by the Responsible Sourcing Network?	1 point: 1/2 for participation 1-2 times; an additional 1/2 for participation more than 2 times	0	"Yes"	No information available	No information available	http://www.sourcin gnetwork.org/partn ers/	No points were awarded on the basis of information provided by RSN.
Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region (26)							

			Company				
SIGNET JEWELERS	Possible Points	Points	Response	Available Information	SEC Filings	Relevant Links	Justification
a) Is the company							
participating in the							
Solutions for Hope Gold							
process, organized by							
Resolve, or an analogous							
initiative to source conflict-							
free gold from Congo?							
(For the Resolve process: 2							
points for committing to							
participate, 1 point for							Based on
attending one or more							information from
meetings, 2 points for							a representative
being a member of a							of Resolve, the
working group. Points for							coordinating
an analogous process will							organization of
be determined on the							the Solutions for
basis of information				Signet committed to participate in the Solutions for Hope Gold process			Hope Gold
provided.)	5 points	3	"No"	and participated in the first meeting.	No information available	N/A	project.
provided.j	5 points		110		"Because Signet's SRSP for		projecti
					gold is aligned with the		
					LBMA's Responsible Gold		
					Guidance, Signet has		
					reason to believe that		
					some gold supplies		
					provided through LBMA		
					'good delivery' system may		
					have originated from DRC		Partial credit was
					or adjoining countries, all		given because
	6 points: 4 for				of which were refined by		the company has
b) Is the company sourcing			"[Yes]Thro		refiners which are certified	http://www.signetie	reason to believe
verifiably conflict-free gold			ugh		under the terms of LBMA		they source gold
from the Great Lakes	region, 2		[the London		as 'conflict free' after an	c downloads/Signet-	
region of Africa (the	additional for		Bullion		independent audit	Responsible-	originated from
Democratic Republic of the			Market	"Suppliers to Signet are recommended to ensure their gold supplies are	obtained by LBMA and	Sourcing-Protocol-	the Great
Congo or any country	specifically from		Association].	from current LBMA 'good delivery' refineries (see gold list at	therefore are 'DRC conflict-	for-Gold-revised-	Lakes region but
bordering)?	Congo	2	"	www.lbma.org.uk)."	free.'"	September-2013.pdf	cannot verify.
				······································			
c) Is the company sourcing							
conflict-free gold							
specifically from the Kivu							
provinces of Congo?	11 points	0	"No"	No information available	No information available	N/A	N/A

			Company				
SIGNET JEWELERS	Possible Points	Points	Response	Available Information	SEC Filings	Relevant Links	Justification
d) Does the company or							
company foundation	4 points: 2 points						
support community-	for support						
approved income	between						
generation and/or	\$20,000 and						
development projects for	\$50,000, 4 points						
mining communities in	for support						
Congo's Kivu provinces?	above \$50,000	0	"No"	No information available	No information available	N/A	N/A
TOTAL	51	18					

TARGET	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
Section 1: Company Policy							
(6)							
a) Does the company have a policy articulating its commitment to ensuring that its sourcing practices do not support armed conflict and gross human rights abuses (i.e., either a conflict minerals policy that explicitly covers gold, or a policy that specifically covers conflict gold)?	2 points: 1 for making the policy publicly available; an additional 1 for making the policy easily accessible	2	sourcing owned brand products that contain gold from vendors who engage in responsible mining practices. We support the efforts of Oxfam and Earthworks with the "No Dirty Gold" campaign and reinforce this commitment through vendor education	"Target supports the humanitarian goals of the Dodd Frank Act and recognizes the adverse impact from mining and trade of Tin, Tungsten, Tantalum and Gold (3TG) by armed groups in the Democratic Republic of Congo and its adjoining countries (DRC). Furthermore, we seek neither, directly nor indirectly, to finance or benefit those armed groups. 3TG that are used to finance armed conflict in the DRC are known as Conflict Minerals. Target will not knowingly purchase or sell any product if we have reason to believe that it contains any Conflict Mineral necessary to the product."	"We adopted a policy relating to the sourcing of 3TG (the 'Conflict Minerals Policy'). The Conflict Minerals	https://corporate.tar get.com/corporate- responsibility/respon sible-sourcing/social- compliance/labor- and-human-rights /Archives/edgar/data	N/A
b) Has the company committed to implementing internationally-accepted supply chain due diligence standards, such as the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High-Risk Areas?		2	"Last year, we implemented a process (in alignment with guidance provided by the Organization for Economic Co-operation and Development) to identify and mitigate the existence of conflict minerals in Target's supply chain for its owned brand products."	No information available	"We expect to take the following additional steps in 2014 to mitigate the risk that our necessary in-scope 3TG benefit armed groups"	https://corporate.tar get.com/corporate- responsibility/respon sible-sourcing/social- compliance/labor- and-human-rights https://www.sec.gov /Archives/edgar/data /27419/0001104659 14043078/a14- 13835 1ex1d02.htm	N/A

TARGET	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
					"All team members with a compliance function within		
					Target Sourcing Services are given training on the		
					Conflict Minerals Rule and our 3TG compliance		
					program. Other team members within Target Sourcing		
c) Has the company					Services are also informed about the Conflict Minerals Rules and our policy with respect to sourcing products		
disseminated its policy on					that might contain 3TG. The training materials remain	https://www.sec.gov	
conflict gold throughout					available for review by team members who have	/Archives/edgar/data	
the company, including to					questions. Selected team members also participated in	/27419/0001104659	
subsidiaries involved in the					conferences, benchmarking and workshops relating to	<u>14043078/a14-</u>	
sourcing and sales of gold?	1 point	1	No information given	No information available	the Conflict Minerals Rule."	13835 1ex1d02.htm	N/A
					"All team members with a compliance function within		
					Target Sourcing Services are given training on the		
					Conflict Minerals Rule and our 3TG compliance		
					program. Other team members within Target Sourcing		
					Services are also informed about the Conflict Minerals		
					Rules and our policy with respect to sourcing products that might contain 3TG. The training materials remain	https://www.sec.gov	
d) Has the company					available for review by team members who have	/Archives/edgar/data	
provided interactive					questions. Selected team members also participated in	/27419/0001104659	
employee training on the					conferences, benchmarking and workshops relating to	14043078/a14-	
policy?	1 point	1	No information given	No information available	the Conflict Minerals Rule."	13835 1ex1d02.htm	N/A
Section 2: Engagement							
with Suppliers (10)							

TARGET	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
					"We communicated our sourcing expectations relating		
					to 3TG to vendors through direct communications,		
					information posted on our vendor website, and online training. Additionally, vendors were provided with an		
					email address at Target where they could direct any		
					questions about our 3TG compliance program or		
					Conflict Minerals Policy. As part of our engagement		
					efforts, we communicated to all owned and exclusive		
					brand vendors that Target would no longer accept any		
					products that contained 3TG from the DRC or an		
					adjoining country unless the 3TG could be verified as		
					coming from a conflict free smelter. Our existing		
					integrity hotline was designated as a mechanism for team members, vendors and other interested parties		
					to be able to report violations of the Conflict Minerals		
a) Has the company					Policy. We also adopted a policy requiring the	https://www.sec.go v/Archives/edgar/d	
communicated its conflict					maintenance of our 3TG-related records for a minimum		
gold policy to its suppliers					of five years on a computerized database and	65914043078/a14-	
(at minimum, 1st-tier					requested that the Service Provider store records in its	13835_1ex1d02.ht	
suppliers)?	1 point	1	No information given	No information available	possession on our behalf to comply with this policy."	<u>m</u>	N/A
b) Has the company							
publicly committed itself							
to sourcing only from							
conflict-free refiners							Despite the
certified by the Conflict-							company
Free Smelter program,							statement, the
London Bullion Market				"Target expects that each of the		https://corporate.tar	company does not
Association, or Responsible Jewellery				vendors with which it contracts to manufacture will: Use smelters		get.com/corporate- responsibility/respon	publicly commit to using one of the
Council (RJC), as conflict-				certified as being free of Conflict		sible-sourcing/social-	conflict-free refiner
free smelters become				Minerals whenever sourcing 3TG		compliance/labor-	auditing systems
	3 points	0	No information given	mined in the DRC region."	No information available	and-human-rights	listed.
				1		and Harrian Highto	

TARGET	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
					"In connection with our due diligence, 48 unique	https://www.sec.gov	
					smelters and refiners were identified by our vendors of	/Archives/edgar/data	
c) lies the seminant						/27419/0001104659	
c) Has the company					owned and exclusive brand products in the included		
published the number of					merchandise categories as being part of the vendors'	<u>14043078/a14-</u>	
refiners in its supply chain?	1.5 points	1.5	No information given	No information available	supply chains."	13835 1ex1d02.htm	
d) Has the company							
published the names of its							
refiners in its supply chain?	1 E pointe	0	No information given	No information available	No information available	N/A	
	1.5 points	0	NO INICITIATION GIVEN			N/A	
e) Has the company held							
meetings with its suppliers							
to develop strategies for	3 points: 2 for 1						
sourcing conflict-free gold	meeting, 3 for 2+						
from Congo?	meetings	0	No information given	No information available	No information available	N/A	
	meetings	0	NO INICITIATION GIVEN			N/A	
Section 3: Participation in							
Initiatives to Help Build a							
Clean Gold Trade in Congo							
and the Great Lakes							
Region (9)							
a) Is the company a							
member of the Public							
Private Alliance for						http://www.resolv.or	
Responsible Minerals						g/site-	
Trade (PPA)?	3 points	0	No information given	No information available	No information available	ppa/participation/	
b) Has the company							
attended the forums of the							
OECD Due Diligence							
Guidance for Responsible							
Supply Chains of Minerals	2 points: 1 for 1						
from Conflict-Affected and	forum, 2 for						
High-Risk Areas?	multiple forums	0	No information given	No information available	No information available	N/A	
						http://www.responsi	
						blejewellery.com/me	
c) Is the company a						mbers/certified-	
member of RJC or the						members/; http://w	
						ww.responsibleminin	
Initiative for Responsible	1		No information - hora	No information or the late	No information qualiphic		
Mining Assurance (IRMA)?	1 point	0	No information given	No information available	No information available	g.net/participants/ http://www.responsi	
d) Has the company been						blejewellery.com/me	
certified by the RJC Chain-						mbers/chain-of-	
of-Custody Certification						custody-certified-	
	2 points		No information given	No information available	No information available	entities/	
program?		0	No mormation given			endues/	

TARGET	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
e) Does the company	1 point: 1/2 for						
	participation 1-2						No points were
stakeholder group (MSG)	times; an additional					http://www.sourcing	
run by the Responsible	1/2 for participation					network.org/partner	basis of information
Sourcing Network?	more than 2 times	0	No information given	No information available	No information available	c/	provided by RSN.
		0	No information given			<u>3/</u>	provided by NSN.
Section 4: Commitment to							
Building a Clean Gold							
Supply Chain in Congo and							
the Great Lakes Region							
(26)							
(20)							
a) Is the company							
participating in the							
Solutions for Hope Gold							
process, organized by							
Resolve, or an analogous							
initiative to source conflict-							
free gold from Congo?							
(For the Resolve process: 2							
points for committing to							
participate, 1 point for							
attending one or more							
meetings, 2 points for							
being a member of a							
working group. Points for							
an analogous process will							
be determined on the							
basis of information							
provided.)	5 points	0	No information given	No information available	No information available	N/A	
b) Is the company sourcing							
verifiably conflict-free gold							
from the Great Lakes	sourcing from the						
	Great Lakes region,						
Democratic Republic of the							
Congo or any country	sourcing specifically						
	from Congo	0	No information given	No information available	No information available	N/A	
sordering/:	nom congo						
c) Is the company sourcing							
conflict-free gold							
specifically from the Kivu							
provinces of Congo?	11 points	0	No information given	No information available	No information available	N/A	

TARGET	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
d) Doos the company or							
d) Does the company or							
company foundation							
support community-	4 points: 2 points						
approved income	for support						
generation and/or	between \$20,000						
development projects for	and \$50,000, 4						
mining communities in	points for support						
Congo's Kivu provinces?	above \$50,000	0	No information given	No information available	No information available	N/A	
TOTAL	51	8.5					

TIFFANY & CO.	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
Section 1: Company Policy							
(6)							
a) Does the company have a policy articulating its commitment to ensuring that its sourcing practices do not support armed conflict and gross human rights abuses (i.e., either a conflict minerals policy	2 points: 1 for making the policy publicly available; an			"The Board of Directors of Tiffany & Co. has adopted a Conflict Minerals Policy for the company. This policy sets forth the Company's expectations that its applicable vendors complete annual training on the policy, submit an annual conflict minerals survey, and source from a smelter or refiner that has obtained a "conflict- free" designation with an independent private sector audit, such as those from the Conflict-Free Smelter Program, the "Good Delivery" list of the London Bullion Market Association and the Responsible Jewellery Council's Chain-of-Custody Standard. This policy also includes a mechanism for vendors, employees, and others to report concerns regarding potential policy violations. The Tiffany & Co. Conflict Minerals Policy does not ban our vendors from sourcing minerals from the DRC or adjoining countries; we believe such a		http://be.tiffany.c om/CSR/Supply.as px#p+1-n+1000-c+-	
that explicitly covers gold, or a policy that specifically	additional 1 for making the policy			ban would adversely impact the mining communities and businesses operating		<u>s+-r+-t+-ni+1-x+-</u> pu+-f+-lr+-hr+-ri+-	
covers conflict gold)?	easily accessible	2	No information given	responsibly in the region."	No information available	mi+-pp+	N/A
b) Has the company committed to implementing internationally-accepted supply chain due diligence standards, such as the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-					"The Company designed its due diligence measures to conform in all material respects with the framework set forth in the Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chain of Minerals from Conflict- Affected and High Risk Areas (Second Edition), including the related	https://www.sec.g ov/Archives/edgar /data/98246/0000	committing to
Affected and High-Risk Areas?	2 points	1	No information given	No information available	supplements on gold, tin, tantalum, and tungsten."	<u>09824614000172/e</u> x102.htm	them in the future.

TIFFANY & CO.	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
			"We have disseminated				
			the policy to vendors and				
c) Has the company			throughout the company				
disseminated its policy on			to employees that deal				
conflict gold throughout			with or address sourcing				
the company, including to			issues, in the form of				
subsidiaries involved in the			direct letters to vendors				
sourcing and sales of gold?				No information available	No information available	N/A	N/A
	1 point	1					N/A
					"In the coming year, the		
					Company expects to take		
					the following steps		
					creating and		Despite the
					distributing enhanced		positive steps
					training materials		that Tiffany
					concerning the Company's		expects to take
					Conflict Minerals policy		in the coming
					and compliance process to	https://www.sec.g	year, the
d) Has the company			The company is working on		Company employees who	ov/Archives/edgar	company has not
provided interactive			having a training tool to		are most involved in the	/data/98246/0000	yet provided
employee training on the			promote internal and		vendor selection and	09824614000172/e	interactive
policy?	1 point	0	external awareness.	No information available	management processes."	<u>x102.htm</u>	training.
Section 2: Engagement							
with Suppliers (10)							

TIFFANY & CO.	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
					"Vendor relationships are actively managed through		
				"This policy sets forth the Company's expectations that its applicable	a variety of channels, such as vendor contracts;		
				vendors complete annual training on the policy, submit an annual	vendor questionnaires; the Company's Vendor		
				conflict minerals survey and source from a smelter or refiner that has obtained a 'conflict-free' designation with an	Manual, an educational and training tool and mandate for vendors; and		
				independent private sector audit, such as those from the Conflict-Free	the Company's Social Accountability Program,	http://www.tiffany .com/csr/responsi blesourcing/Suppli	
				Smelter Program, the 'Good Delivery' list of the London Bullion Market	which supports vendor compliance with the	erResponsibility.as	
			"Yes, we communicated	Association and the	Company's Vendor Code of		
a) Has the company			through direct letters and	Responsible Jewellery Council's Chain-of-Custody	Conduct and incorporates	http://edgar.sec.g	
communicated its conflict gold policy to its suppliers			brought them to the board	also includes a mechanism for vendors,	Company risk assessments, vendor self-assessments,	ov/Archives/edgar /data/98246/0000	
(at minimum, 1st-tier			and to promote	employees and others to report concerns	and external audits of	09824614000172/f	
suppliers)?	1 point		awareness."	regarding potential policy violations."	vendors."	ormsd060214.htm	N/A
				"This policy sets forth the Company's			,
				expectations that its applicable			
				vendors complete annual training on the policy,			
				submit an annual			
				conflict minerals survey and source from a			
b) Has the company				smelter or refiner that has			
publicly committed itself				obtained a 'conflict-free' designation with an			
to sourcing only from				independent private			
conflict-free refiners				sector audit, such as those from the Conflict-Free			
certified by the Conflict-				Smelter Program, the			
Free Smelter program,				'Good Delivery' list of the London Bullion Market			
London Bullion Market				Association and the			
Association, or				Responsible Jewellery Council's Chain-of-Custody		http://www.tiffany	
Responsible Jewellery				Standard. This policy		.com/csr/responsi	
Council (RJC), as conflict-				also includes a mechanism for vendors,		blesourcing/Suppli	
free smelters become				employees and others to report		erResponsibility.as	
available?	3 points	3	No information given	concerns regarding potential policy violations."	No information available	<u>px</u>	N/A

TIFFANY & CO.	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
c) Has the company published the number of refiners in its supply						https://www.sec.g ov/Archives/edgar /data/98246/0000 09824614000172/e	
chain?	1.5 points	1.5	No information given	No information available	See chart in SEC filing	x102.htm https://www.sec.g	N/A
d) Has the company published the names of its refiners in its supply	1 E pointe	1 5	No information river	No information available	Soo short in SEC filing	ov/Archives/edgar /data/98246/0000 09824614000172/e	N/0
chain?	1.5 points	1.5	No information given	No information available	See chart in SEC filing	<u>x102.htm</u>	N/A
sourcing conflict-free gold	3 points: 2 for 1 meeting, 3 for 2+ meetings	0	No information given	No information given	No information given	No information given	N/A
Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region (9)							
a) is the company a member of the Public Private Alliance for Responsible Minerals Trade (PPA)?	3 points	0	No information given	No information available	No information available	http://www.resolv .org/site- ppa/participation/	NI/A
	5 points	0	No information given			ppa/participation/	N/A
b) Has the company attended the forums of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas?	2 points: 1 for 1	2	Yes, multiple.	No information available	No information available		Based on Enough Project knowledge and attendence of OECD forums
c) Is the company a member of RJC or the Initiative for Responsible Mining Assurance (IRMA)?	1 point	1	No information given	Yes	Listed as a member of RJC and IRMA	http://www.respo nsiblemining.net/p articipants/ http://www.respo nsiblejewellery.co m/members/certifi ed-members/	N/A

TIFFANY & CO.	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
. N. Line allow a second second						http://www.respo	
d) Has the company been certified by the RJC Chain-						nsiblejewellery.co m/members/chain-	
of-Custody Certification						of-custody-	
program?	2 points	0	No information given	No information available	No information available		N/A
	2 points	0	No information given			<u>certified-entities/</u>	
e) Does the company	1 point: 1/2 for						No points were
participate in the multi-	participation 1-2						awarded on the
stakeholder group (MSG)	times; an additional					http://www.sourci	basis of
run by the Responsible	1/2 for participation					ngnetwork.org/par	information
Sourcing Network?	more than 2 times	0	No information given	No information available	No information available	tners/	provided by RSN.
Section 4: Commitment to							
Building a Clean Gold							
Supply Chain in Congo and							
the Great Lakes Region							
(26)							
a) Is the company							
participating in the							
Solutions for Hope Gold							
process, organized by							
Resolve, or an analogous							
initiative to source conflict-							
free gold from Congo?							
(For the Resolve process: 2							
points for committing to							Based on
participate, 1 point for							information
attending one or more							from a
meetings, 2 points for							representative
being a member of a							of Resolve, the
working group. Points for							coordinating
an analogous process will							organization of
be determined on the				Tiffany committed to participate in the Solutions			the Solutions for
basis of information	.	_		for Hope gold process and participated in the first		http://solutions-	Hope Gold
provided.)	5 points	3	No information given	meeting.	No information available	<u>network.org/</u>	project.
b) Is the company sourcing							
verifiably conflict-free gold							
from the Great Lakes	sourcing from the						
-	Great Lakes region, 2						
Democratic Republic of the							
Congo or any country	sourcing specifically						
bordering)?	from Congo	0	No information given	No information available	No information available	N/A	N/A

TIFFANY & CO.	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
c) Is the company sourcing							
conflict-free gold							
specifically from the Kivu							
provinces of Congo?	11 points	0	No information given	No information available	No information available	N/A	N/A
d) Does the company or							
company foundation							
support community-	4 points: 2 points for		"A grant for more than				
approved income	support between		\$50,000 will be awarded to				
generation and/or	\$20,000 and		DDI/PAC project on				
development projects for	\$50,000, 4 points for		formalizing the artisanal				
mining communities in	support above		mining sector in eastern				
Congo's Kivu provinces?	\$50,000	4	Congo."	No information available	No information available	N/A	N/A
TOTAL	51	21					

WAL-MART	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
Section 1: Company Policy							
(6)							
(6)				"Walmart expects its product suppliers to actively support Walmart's conflict minerals compliance efforts by: adopting			
a) Does the company have a policy articulating its				responsible mineral sourcing policies in: 1) dealing with their supply chains that are consistent with this policy and the OECD guidance 2)	"the Company has adopted a Global Conflict		
commitment to ensuring that its sourcing practices do not support armed			"Walmart has taken a		Minerals Compliance Policy (the "Conflict Minerals Policy") that sets	http://corporate.wa lmart.com/policies/ conflict-minerals-	
conflict and gross human rights abuses (i.e., either a	2 points: 1 for making the policy		compliance obligations,	support human rights violations in	forth the Company's expectations that its third-	policy http://www.sec.gov	
	publicly available; an additional 1 for making the policy		global policy that supports	the DRC 3) providing evidence to support their representations as to the conflict minerals status of their	party suppliers will actively support the Company's Conflict Minerals	/Archives/edgar/da ta/104169/000010 416914000029/for	
covers conflict gold)?	easily accessible	2	conflict minerals."	products upon request."	compliance efforts"	msd.htm	N/A

WAL-MART	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
				"As a member of the Retail Industry			
				Leaders Association's (RILA's)			
				Conflict Minerals Program Executive			
				Committee, we have partnered with			
				other retailers to produce training			
				materials and tailor the			
				questionnaire originally developed			
				by the Electronics Industry			Half credit was
b) Has the company				Citizenship Coalition (EICC) and the			given here
committed to				-			0
			"We and other retailers	Global e-Sustainability Initiative			because, while the
implementing			and manufacturers have	(GeSI) to be more specific to retail			company used
internationally-accepted				suppliers. We have also engaged			such guidelines in
supply chain due diligence			invested considerable	third party firms with specialized			designing its
standards, such as the				experience in various aspects of			supply chain
Organization for Economic				conflict minerals to assist Walmart in			policies and
Cooperation and			and procedures consistent	•			procedures, there
Development (OECD) Due			-	implementation of our program,			is not yet a
Diligence Guidance for			will allow us to comply	which includes due diligence			statement of
Responsible Supply Chains			with thereporting	activities consistent with the		http://corporate.wa	
of Minerals from Conflict-			•	Organisation for Economic Co-			committing to
Affected and High-Risk				operation and Development (OECD)		conflict-minerals-	implementing
Areas?	2 points	1	31, 2014."	Guidelines."	No information available	policy	them in the future.
							No credit was
							given because no
							information about
							this issue is found
c) Has the company							on the company
disseminated its policy on							website or SEC
conflict gold throughout							report, and no
the company, including to							information was
subsidiaries involved in			"We should be awarded				provided by the
the sourcing and sales of			additional points				company despite
gold?	1 point	0	for1(c)"	No information available	No information available	N/A	repeated requests.

WAL-MART	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
							No points were
							awarded because
							no information
							was given about
							what steps the
							company took to
d) Has the company							work on this issue,
provided interactive			"We should be awarded				despite repeated
employee training on the			additional points				requests from the
policy?	1 point	0	for1(d)"	No information available	No information available	N/A	Enough Project.
Section 2: Engagement							
with Suppliers (10)							
							In order to earn
							points for this
							category,
							companies were
							required to specify
							by what means
							they disseminated
							their conflict gold
							policy to their
							suppliers. Though
							Walmart notes
							that the policy has
							been
							disseminated, the
							company did not,
							over the course of
N					limit to the first		several
a) Has the company					"The expectations of the	http://www.sec.gov	communications,
communicated its conflict			1947 I III I I		Company under its Conflict	/Archives/edgar/da	clarify by what
gold policy to its suppliers			"We should be awarded		Minerals Policy were	ta/104169/000010	means their policy
(at minimum, 1st-tier		_	additional points		communicated to the	416914000029/for	was
suppliers)?	1 point	0	for2(a)"	No information available	Suppliers."	<u>msd.htm</u>	communicated.

WAL-MART	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
							Even though
							Walmart's Conflict
b) Has the company							Minerals policy
publicly committed itself							states that they
to sourcing only from							expect all supply
conflict-free refiners							chain sources to be
certified by the Conflict-			"We should be awarded				proven to be
Free Smelter program,			additional points for				conflict-free, the
London Bullion Market			survey question 2(b)				company does not
Association, or			because our Conflict				publicly commit to
Responsible Jewellery			Minerals Policy states that				sourcing only from
Council (RJC), as conflict-			we expect all supply chain				one of the
free smelters become			sources to be proven to be				certification
available?	3 points	0	conflict-free."	No information available	No information available	N/A	programs listed.
c) Has the company							
published the number of							
refiners in its supply	1 E mainte	0	No information since			N1/A	N1/A
chain?	1.5 points	0	No information given	No information available	No information available	N/A	N/A
d) Has the company							
published the names of its							
refiners in its supply							
chain?	1.5 points	0	No information given	No information available	No information available	N/A	N/A
							No points were
							awarded because
							no information
							was given about
							what steps the
e) Has the company held							company took to
meetings with its suppliers							work on this issue,
to develop strategies for	3 points: 2 for 1		"We should be awarded				despite repeated
sourcing conflict-free gold	meeting, 3 for 2+		additional points				requests from the
from Congo?	meetings	0	for2(e)."	No information available	No information available	N/A	Enough Project.
Section 3: Participation in							
Initiatives to Help Build a							
Clean Gold Trade in Congo							
and the Great Lakes							
Region (9)							

WAL-MART	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
a) Is the company a member of the Public Private Alliance for Responsible Minerals						http://www.resolv. org/site-	
Trade (PPA)?	3 points	0	No information given	No information available	No information available		N/A
b) Has the company attended the forums of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals	2 points: 1 for 1 forum, 2 for multiple						,
High-Risk Areas?	forums		No information given	No information available	No information available	N/A	N/A
c) Is the company a member of RJC or the Initiative for Responsible Mining Assurance (IRMA)?	1 point	0	No information given	No information available	No information available	http://www.respon siblejewellery.com/ members/certified- members/ http://www.respon siblemining.net/par ticipants/	N/A
d) Has the company been certified by the RJC Chain- of-Custody Certification program?	2 points	0	No information given	No information available	No information available	N/A	N/A
e) Does the company participate in the multi- stakeholder group (MSG) run by the Responsible Sourcing Network?	1 point: 1/2 for participation 1-2 times; an additional 1/2 for participation more than 2 times	0	No information given	No information available	No information available	http://www.sourcin gnetwork.org/partn ers/	No points were awarded on the basis of information provided by RSN.
Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region (26)							

WAL-MART	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
a) Is the company							
participating in the							
Solutions for Hope Gold							
process, organized by							
Resolve, or an analogous							
initiative to source conflict-							
free gold from Congo?							
(For the Resolve process: 2							
points for committing to							
participate, 1 point for							
attending one or more							
meetings, 2 points for							
being a member of a							
working group. Points for							
an analogous process will							
be determined on the							
basis of information							
provided.)	5 points	0	No information given	No information available	No information available	N/A	N/A
b) Is the company sourcing							
verifiably conflict-free gold	6 points: 4 for						
from the Great Lakes	sourcing from the						
	Great Lakes region, 2						
-	additional for						
	sourcing specifically						
	from Congo	0	No information given	No information available	No information available	N/A	N/A
bordering)?	Ironi Congo	0	NO INFORMATION GIVEN			N/A	N/A
c) Is the company sourcing							
conflict-free gold							
specifically from the Kivu							
	11 points	0	No information given	No information available	No information available	N/A	N/A
						· ·	
d) Does the company or							
company foundation	1 pointer 2 points for						
	4 points: 2 points for						
	support between						
-	\$20,000 and						
	\$50,000, 4 points for						
	support above						
	\$50,000		No information given	No information available	No information available	N/A	N/A
TOTAL	51	3					