



**enough**

The project to end genocide and crimes against humanity

## Interim Jewelry Leaderboard

TIFFANY

SIGNET JEWELERS

JC PENNEY

TARGET

MACY'S

CARTIER

QVC

Retailers taking steps to combat the illicit trade of conflict gold in Congo

# 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,<sup>1</sup> the trade in conflict gold continues to finance armed groups, according to the U.N. Group of Experts on the Congo.<sup>2</sup> 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.<sup>3</sup> 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 step-by-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.<sup>4</sup> 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.<sup>5</sup> 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.<sup>6</sup>

Enough has highlighted the top half of the 14 jewelry supersellers in this interim leaderboard.<sup>7</sup> 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.<sup>8</sup>

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

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 in-person 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

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<sup>1</sup> 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>.

<sup>2</sup> 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>.

<sup>3</sup> 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>.

<sup>4</sup> 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-conflict-minerals-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.

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

<sup>6</sup> Barrio 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-press-releases/prensa/533-first-us-based-refiner-and-jewelers-join-the-fairmined-initiative>.

<sup>7</sup> 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.

<sup>8</sup> 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.

# Interim Jewelry Leaderboard Methodology Report

Criteria Annex

<b>Company</b>	<b>Points</b>	<b>Percentage</b>
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
<b>Section 1: Company Policy (6)</b>		
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	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 commitment. 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.
<b>Section 2: Engagement with Suppliers (10)</b>		
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.



c) Has the company published the number of refiners in its supply chain?	1.5 points	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 refiners together. No credit is given to companies which only publish the number of suppliers.
d) Has the company published the names of its refiners in its supply chain?	1.5 points	Full credit is given to companies which publish the names of known refiners in their supply chains.
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	To receive full credit for this question, the meetings must specifically include discussion of sourcing conflict-free gold from the Democratic Republic of Congo (DRC). A brief description of the discussion was needed to gain points here.
<b>Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region (9)</b>		
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 Conflict-Affected and High-Risk Areas?	2 points: 1 for 1 forum, 2 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	--
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	--
<b>Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region (26)</b>		
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	--

b) Is the company sourcing verifiably conflict-free gold from the Great Lakes region of Africa (the Democratic Republic of the Congo or any country bordering)?	6 points: 4 for sourcing from the Great Lakes region, 2 additional for sourcing specifically from 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	--

<b>CARTIER</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
<b>Section 1: Company Policy (6)</b>							
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	"The company has just gone through a review of the gold sourcing policy, particularly on conflict gold. It has been finalized, been approved by the Board of Directors, and will be up by the end of 2014."	"At Cartier, our gold suppliers have unequivocally committed, in writing, to responsible gold sourcing practices as described by the Responsible Jewellery Council in its Code of Practices. They have also pledged to implement every possible measure, within their operations and sphere of influence, to prevent gold that may be used to finance human rights violations from entering the watch and jewelry supply chain, particularly when it comes to the gold products they supply to us. Our suppliers are now required to join the RJC and have their operations certified to its Code of Practices, which covers human rights, ethical, social and environmental performance."	Did not file	<a href="http://www.cartier.com/mission/commitments/cartier-and-corporate-social-responsibility/resources-excellence/gold-12160">http://www.cartier.com/mission/commitments/cartier-and-corporate-social-responsibility/resources-excellence/gold-12160</a>	RJC Code of Practices includes responsible mining practices, including policies on human rights and conflict.  <a href="http://www.responsiblejewellery.com/files/RJC_Code_of_Practices_2013_eng.pdf">http://www.responsiblejewellery.com/files/RJC_Code_of_Practices_2013_eng.pdf</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 points	0	"We are also involved in other initiatives addressing the issues you have raised such as the OECD-ICGLR-UN GoE Joint Forum on Responsible Mineral Sourcing."	No information available	Did not file	N/A	We applaud Cartier's commitment to participating in the OECD forums, for which it received points in Section 3b. However, being "involved in OECD" does not amount to committing to implementing OECD Due Diligence Guidelines.
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	1	"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 the time of the next communication regarding the complete CSR policy is announced later this year."	No information available	Did not file	N/A	N/A

<b>CARTIER</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
d) Has the company provided interactive employee training on the policy?	1 point	1	"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 the time of the next communication regarding the complete CSR policy is announced later this year."	No information available	Did not file	N/A	N/A
<b>Section 2: Engagement with Suppliers (10)</b>							
a) Has the company communicated its conflict gold policy to its suppliers (at minimum, 1st-tier suppliers)?	1 point	1	"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 suppliers based on a supportive expectation of continuous improvement with regular exchanges with CSR staff, and mutual sharing of experiences and best practices."	No information available	Did not file	N/A	N/A

<b>CARTIER</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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	"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 once we have rolled out our policy and engaged our suppliers."	No information available	Did not file	N/A	While Cartier has made positive advancements in its commitments to conflict-free sourcing, its commitments are not public, and it has not specified one of the three programs as listed.
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 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 sourcing conflict-free gold from Congo?	3 points: 2 for 1 meeting, 3 for 2+ meetings	0	No information given	No information available	Did not file	N/A	N/A
<b>Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region (9)</b>							

<b>CARTIER</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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	Did not file	<a href="http://www.resolv.org/site/ppa/participation/">http://www.resolv.org/site/ppa/participation/</a>	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 forums	2	No information given	No information available	Did not file	N/A	Observation by Enough Project staff at Forums
c) Is the company a member of RJC or the Initiative for Responsible Mining Assurance (IRMA)?	1 point	1	No information given	Listed as a member of RJC	Did not file	<a href="http://www.responsiblejewellery.com/members/certified-members/">http://www.responsiblejewellery.com/members/certified-members/</a> <a href="http://www.responsiblemining.net/participants/">http://www.responsiblemining.net/participants/</a>	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	<a href="http://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/">http://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/</a>	Parts of the company are certified by the RJC Chain-of-Custody Certification program, but the Cartier boutique shop has not been certified.
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	Did not file	<a href="http://www.sourcingnetwork.org/partners/">http://www.sourcingnetwork.org/partners/</a>	No points were awarded on the basis of information provided by RSN.
<b>Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region (26)</b>							

<b>CARTIER</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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 region of Africa (the Democratic Republic of the Congo or any country bordering)?	6 points: 4 for sourcing from the Great Lakes region, 2 additional for sourcing specifically from Congo	0	No information given	No information available	Did not file	<a href="http://www.cartier.com/maison/commitments/cartier-and-corporate-social-responsibility/resources-excellence/gold-12160%20">http://www.cartier.com/maison/commitments/cartier-and-corporate-social-responsibility/resources-excellence/gold-12160%20</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 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	0	No information given	No information available	Did not file	N/A	N/A
<b>TOTAL</b>	<b>51</b>	<b>8</b>					

<b>COSTCO</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
<b>Section 1: Company Policy (6)</b>							
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	1	No information given	Costco Wholesale Corporation purchases finished consumer goods from manufacturers. We do not directly purchase Conflict Minerals from any source. We are committed to working with our suppliers to increase transparency regarding the origin and traceability of minerals contained in the products we sell with the goal of ensuring that, in due course, all the nonfood merchandise we carry is 'DRC Conflict Free.' Commencing January 2013 and going forward, Costco's nonfood suppliers will be requested to provide the supply chain information necessary to support the Conflict Minerals reporting requirements in accordance with the Section 1502 of the Dodd-Frank Act, as interpreted by the U.S. Securities and Exchange Commission. OUR COMMITMENT: 1. We support the aims and objectives of the Dodd-Frank Act regarding 'Conflict Minerals.' 2. We do not knowingly buy consumer goods containing minerals that originate from facilities in the 'Conflict Region' that are not certified as 'conflict free'. 3. We ask Costco's suppliers to use reasonable due diligence with their supply chains to ensure that specified metals used in primary and component parts of consumer goods are being sourced only from: - Mines and smelters outside the 'Conflict Region', - Mines and smelters which have been certified by an independent third party as 'conflict free' if sourced within the 'Conflict Region', or - Recycled or scrap sources."	No information available	<a href="http://phx.corporate-ir.net/External.File?item=UGFyZW50SUQ9MjM3ODM4feNoaWxkSUQ9LTF8VHlwZT0z&amp;t=1">http://phx.corporate-ir.net/External.File?item=UGFyZW50SUQ9MjM3ODM4feNoaWxkSUQ9LTF8VHlwZT0z&amp;t=1</a>	The policy is not posted on the company website but on a third party website that is difficult to access. A search for "conflict minerals" or "conflict minerals policy" on the Costco website does not yield any results. 1 point was therefore awarded for the policy; 1 point was withheld because the policy is not easily accessible.
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	2	No information given	No information available	"In accordance with OECD due diligence guidelines, Costco will report annually on supply chain due diligence, either through a Conflict Minerals Report filed under Form SD or the Company's website."	<a href="http://edgar.sec.gov/Archives/edgar/data/909832/000090983214000013/exhibit102.htm">http://edgar.sec.gov/Archives/edgar/data/909832/000090983214000013/exhibit102.htm</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?	1 point	0	No information given	No information available	No information available	N/A	N/A



<b>COSTCO</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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
<b>Section 2: Engagement with Suppliers (10)</b>							
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	"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 (GeSI) Conflict Minerals Due Diligence Template (EICC-GeSI Template) to identify 3TG smelters and refiners (SORs) and associated countries of origin."	<a href="http://edgar.sec.gov/Archives/edgar/data/909832/000090983214000013/exhibit102.htm">http://edgar.sec.gov/Archives/edgar/data/909832/000090983214000013/exhibit102.htm</a>	N/A
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	"We ask Costco's suppliers to use reasonable due diligence with their supply chains to ensure that specified metals used in primary and component parts of consumer goods are being sourced only from: Mines and smelters outside the "Conflict Region", Mines and smelters which have been certified by an independent third party as "conflict free" if sourced within the "Conflict Region", or Recycled or scrap sources."	N/A	<a href="http://phx.corporate-ir.net/External.File?item=UGFyZW50SUQ9MjM3ODM4fENoaWxkSUQ9LTF8VHlwZT0z&amp;t=1">http://phx.corporate-ir.net/External.File?item=UGFyZW50SUQ9MjM3ODM4fENoaWxkSUQ9LTF8VHlwZT0z&amp;t=1</a>	The company merely asks (i.e. requests) for the suppliers to follow these steps rather than commit (i.e. require suppliers) to only source from one of the certification programs 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
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

<b>COSTCO</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
<b>Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region (9)</b>							
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	<a href="http://www.resolv.org/site-ppa/participation/">http://www.resolv.org/site-ppa/participation/</a>	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 forum, 2 for multiple forums	0	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	<a href="http://www.responsiblejewellery.com/members/certified-members/">http://www.responsiblejewellery.com/members/certified-members/</a> <a href="http://www.responsiblemining.net/participants/">http://www.responsiblemining.net/participants/</a>	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	<a href="http://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/">http://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/</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	<a href="http://www.sourcingnetwork.org/partners/">http://www.sourcingnetwork.org/partners/</a>	No points were awarded on the basis of information provided by RSN.
<b>Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region (26)</b>							

<b>COSTCO</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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 region of Africa (the Democratic Republic of the Congo or any country bordering)?	6 points: 4 for 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
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 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	0	No information given	No information available	No information available	N/A	N/A
<b>TOTAL</b>	<b>51</b>	<b>4</b>					

<b>HELZBERG DIAMONDS</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
<b>Section 1: Company Policy (6)</b>							
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	No information given	"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 principles and to be in compliance with the conflict minerals laws which Congress passed as part of the Dodd-Frank Wall Street Reform and Consumer Protection Act in order to target conflict minerals, including gold, from the Democratic Republic of the Congo (DCR) and surrounding region. We fully condemn the use of any minerals to fund conflict in the DRC, in its adjoining countries or anywhere in the world."	No information available	<a href="http://www.helzberg.com/category/about+us/helzberg+diamonds'+supply+chain.do">http://www.helzberg.com/category/about+us/helzberg+diamonds'+supply+chain.do</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 Areas?	2 points	2	No information given	No information available	"We believe our processes align with OECD due diligence guidance ... We will continue to further implement the OECD due diligence guidance." (Berkshire Hathaway's SEC filing)	<a href="http://www.sec.gov/Archives/edgar/data/1067983/000119312514221549/d734970dex102.htm">http://www.sec.gov/Archives/edgar/data/1067983/000119312514221549/d734970dex102.htm</a>	N/A

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

<b>HELZBERG DIAMONDS</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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
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
<b>Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region (9)</b>							
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	<a href="http://www.resolv.org/site/ppa/participation/">http://www.resolv.org/site/ppa/participation/</a>	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 forum, 2 for multiple forums	0	No information given	No information available	No information available	N/A	N/A

<b>HELZBERG DIAMONDS</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
c) Is the company a member of RJC or the Initiative for Responsible Mining Assurance (IRMA)?	1 point	0	"We are friendly with RJC but we are not an official member."	No information available	No information available	<a href="http://www.responsiblejewellery.com/members/certified-members/">http://www.responsiblejewellery.com/members/certified-members/</a> <a href="http://www.responsiblemining.net/participants/">http://www.responsiblemining.net/participants/</a>	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	<a href="http://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/">http://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/</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	<a href="http://www.sourcingnetwork.org/partners/">http://www.sourcingnetwork.org/partners/</a>	No points were awarded on the basis of information provided by RSN.
<b>Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region (26)</b>							
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>HELZBERG DIAMONDS</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
b) Is the company sourcing verifiably conflict-free gold from the Great Lakes region of Africa (the Democratic Republic of the Congo or any country bordering)?	6 points: 4 for 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
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 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	0	No information given	No information available	No information available	N/A	N/A
<b>TOTAL</b>		<b>51</b>	<b>6</b>				



JCPENNEY	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	"In 2013, we issued a Conflict Minerals Policy, which includes our guidelines for Suppliers on conflict minerals, including gold. As outlined in our Policy, suppliers may not include in any products sold to JCPenney any tin, tantalum, tungsten or gold mined in the DRC or adjoining countries that fund armed conflict."	"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 does not directly purchase any Conflict Minerals from any source. Since the supply chain for Conflict Minerals is complex, we are committed to working with our supply chain to increase transparency regarding the origin and traceability of minerals contained in our products with the goal of ensuring that all products sold by JCPenney to our customers are "DRC Conflict Free."	"In 2013, we developed a Conflict Minerals Policy that established the following expectations for suppliers. Suppliers may not include in any products sold to JCPenney any tin, tantalum, tungsten or gold mined in the DRC or adjoining countries that fund armed conflict; Suppliers are required to develop Conflict Minerals policies, due diligence frameworks and management systems consistent with OECD guidelines and to drive those efforts throughout their supplier chain; Suppliers of certain JCPenney products will be required to provide written evidence of due diligence documentation including completion of the EICC-GeSI Conflict Minerals Reporting Template; To the extent available, Suppliers must use EICC-GeSI designated Conflict-Free Smelters as the source for any of the Conflict Minerals used in the products sold to JCPenney."	<a href="http://www.icpenney.net/JCPenney/media/SitelImages/PDF%20docs/ICP-Conflict-Minerals--Policy-FINAL-03-01-2013.pdf">http://www.icpenney.net/JCPenney/media/SitelImages/PDF%20docs/ICP-Conflict-Minerals--Policy-FINAL-03-01-2013.pdf</a> <a href="http://www.sec.gov/Archives/edgar/data/1166126/00011661261400032/exhibit102.htm">http://www.sec.gov/Archives/edgar/data/1166126/00011661261400032/exhibit102.htm</a>	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 Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas?	2 points	2	No information given	"JCPenney will be carrying out supply chain due diligence consistent with the the Organization for Economic Cooperation and Development (OECD) guidelines."	"We conducted due diligence on the source and chain of custody of 3TG in our Covered Products in accordance with the Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the 'OECD Guidance'), an internationally recognized due diligence framework."	<a href="http://www.sec.gov/Archives/edgar/data/1166126/000116612614000032/exhibit102.htm">http://www.sec.gov/Archives/edgar/data/1166126/000116612614000032/exhibit102.htm</a> <a href="http://ir.jcpenny.com/phoenix.zhtml?c=70528&amp;p=irol-govCSR">http://ir.jcpenny.com/phoenix.zhtml?c=70528&amp;p=irol-govCSR</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?	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	Although JCPenney's policy says they "have partnered with other retailers to develop supplier education and training materials," this does indicate that employee (not supplier) training has occurred.
<b>Section 2: Engagement with Suppliers (10)</b>							

JCPENNEY	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	1	No information given	No information available	"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 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 supply chain during calendar year 2013 were required to submit a Conflict Minerals Survey."	<a href="http://www.sec.gov/Archives/edgar/data/1166126/00011661261400032/exhibit102.htm">http://www.sec.gov/Archives/edgar/data/1166126/00011661261400032/exhibit102.htm</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	3	No information given	"To the extent available, Suppliers must use EICC-GeSI designated Conflict-Free Smelters as the source for any of the Conflict Minerals used in the products sold to JCPenney." JCPenney is also a member of CFSI.	No information available	<a href="http://www.conflictfree.org/about/members-and-collaborations/">http://www.conflictfree.org/about/members-and-collaborations/</a> <a href="http://www.icpenney.net/JCPenney/media/SiteImages/PDF%20docs/Jcp-Conflict-Minerals--Policy-FINAL-03-01-2013.pdf">http://www.icpenney.net/JCPenney/media/SiteImages/PDF%20docs/Jcp-Conflict-Minerals--Policy-FINAL-03-01-2013.pdf</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

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
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	Based on the SEC report, JCPenney did conduct trainings; however, the SEC report does not indicate whether the trainings include strategies for sourcing from the Great Lakes region.
<b>Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region (9)</b>							
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	<a href="http://www.resolv.org/site-ppa/participation/">http://www.resolv.org/site-ppa/participation/</a>	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 forum, 2 for multiple forums	0	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	1	No information given	Listed as a member of RJC	No information available	<a href="http://www.responsiblejewellery.com/members/certified-members">http://www.responsiblejewellery.com/members/certified-members</a>	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	<a href="http://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/">http://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/</a>	N/A

JCPENNEY	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
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	<a href="http://www.sourcingtonetwork.org/partners/">http://www.sourcingtonetwork.org/partners/</a>	No points were awarded on the basis of information provided by RSN.
<b>Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region (26)</b>							
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 region of Africa (the Democratic Republic of the Congo or any country bordering)?	6 points: 4 for 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
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

<b>JCPENNEY</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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	0	No information given	No information available	No information available	N/A	N/A
<b>TOTAL</b>	<b>51</b>	<b>9</b>					

<b>JEWELRY TELEVISION</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
<b>Section 1: Company Policy (6)</b>							
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	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 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?	1 point	0	No information given	No information available	Did not file	N/A	N/A
d) Has the company provided interactive employee training on the policy?	1 point	0	No information given	No information available	Did not file	N/A	N/A
<b>Section 2: Engagement with Suppliers (10)</b>							

<b>JEWELRY TELEVISION</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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 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 sourcing conflict-free gold from Congo?	3 points: 2 for 1 meeting, 3 for 2+ meetings	0	No information given	No information available	Did not file	N/A	N/A
<b>Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region (9)</b>							
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	Did not file	<a href="http://www.resolv.org/site/ppa/participation/">http://www.resolv.org/site/ppa/participation/</a>	N/A



<b>JEWELRY TELEVISION</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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 forum, 2 for multiple forums	0	No information given	No information available	Did not file	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	Did not file	<a href="http://www.responsiblejewellery.com/members/certified-members/">http://www.responsiblejewellery.com/members/certified-members/</a> <a href="http://www.responsiblemining.net/participants/">http://www.responsiblemining.net/participants/</a>	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	<a href="http://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/">http://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/</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	Did not file	<a href="http://www.sourcingnetwork.org/partners/">http://www.sourcingnetwork.org/partners/</a>	No points were awarded on the basis of information provided by RSN.
<b>Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region (26)</b>							

<b>JEWELRY TELEVISION</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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 region of Africa (the Democratic Republic of Congo or any country bordering)?	6 points: 4 for sourcing from the Great Lakes region, 2 additional for sourcing specifically from 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 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	0	No information given	No information available	Did not file	N/A	N/A
<b>TOTAL</b>	<b>51</b>	<b>0</b>					

MACY'S, INC.	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	No information given	"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 the rule....Macy's expects its suppliers to seek minerals from sources that do not directly or indirectly contribute to the conflict in the covered countries. Macy's reserves the right to request from any supplier at any time such information, certifications, and documentation as it shall deem necessary to monitor or assess compliance with this policy..Macy's seeks to work with suppliers who will share its commitment in working towards compliance with this policy."	No information available	<a href="http://www.macysinc.com/social-responsibility/conflict-minerals-policy/default.aspx">http://www.macysinc.com/social-responsibility/conflict-minerals-policy/default.aspx</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 Areas?	2 points	2	No information given	No information available	"We designed our due diligence measures relating to Conflict Minerals in general conformance with the criteria set forth in the Organisation for Economic Co-operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including the Supplement on Tin, Tantalum and Tungsten and the Supplement on Gold (Second Edition 2013) (the 'OECD Guidance')...We intend to take the following additional steps to mitigate the risk that the necessary Conflict Minerals in our in-scope products benefit armed groups."	<a href="http://www.sec.gov/Archives/edgar/data/794367/000079436714000106/exhibit102.htm">http://www.sec.gov/Archives/edgar/data/794367/000079436714000106/exhibit102.htm</a>	N/A

<b>MACY'S, INC.</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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	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. In addition, the Conflict Minerals policy was posted on our website."	<a href="http://www.macysinc.com/assets/docs/social-responsibility/Conflict_Minerals_Report.pdf">http://www.macysinc.com/assets/docs/social-responsibility/Conflict_Minerals_Report.pdf</a> <a href="http://www.sec.gov/Archives/edgar/data/794367/000079436714000106/exhibit102.htm">http://www.sec.gov/Archives/edgar/data/794367/000079436714000106/exhibit102.htm</a>	N/A
d) Has the company provided interactive employee training on the policy?	1 point	1	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."	<a href="http://www.sec.gov/Archives/edgar/data/794367/000079436714000106/exhibit102.htm">http://www.sec.gov/Archives/edgar/data/794367/000079436714000106/exhibit102.htm</a>	N/A
<b>Section 2: Engagement with Suppliers (10)</b>							
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."	<a href="http://www.macysinc.com/assets/docs/social-responsibility/Conflict_Minerals_Report.pdf">http://www.macysinc.com/assets/docs/social-responsibility/Conflict_Minerals_Report.pdf</a> <a href="http://www.sec.gov/Archives/edgar/data/794367/000079436714000106/exhibit102.htm">http://www.sec.gov/Archives/edgar/data/794367/000079436714000106/exhibit102.htm</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

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 chain?	1.5 points	0.75	No information given	No information available	"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 refiners were in our supply chain."	<a href="http://www.sec.gov/Archives/edgar/data/794367/000079436714000106/exhibit102.htm">http://www.sec.gov/Archives/edgar/data/794367/000079436714000106/exhibit102.htm</a>	Half credit was given because the company published the number of refiners but could not fully verify that these refiners 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
<b>Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region (9)</b>							
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	<a href="http://www.resolv.org/site/ppa/participation/">http://www.resolv.org/site/ppa/participation/</a>	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 forum, 2 for multiple forums	0	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	<a href="http://www.responsiblejewellery.com/members/certified-members/">http://www.responsiblejewellery.com/members/certified-members/;</a> <a href="http://www.responsiblemining.net/participants/">http://www.responsiblemining.net/participants/</a>	N/A

<b>MACY'S, INC.</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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	<a href="http://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/">http://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/</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	<a href="http://www.sourcingnetwork.org/sec/">http://www.sourcingnetwork.org/sec/</a>	No points were awarded on the basis of information provided by RSN.
<b>Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region (26)</b>							
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 region of Africa (the Democratic Republic of the Congo or any country bordering)?	6 points: 4 for 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
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

<b>MACY'S, INC.</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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	0	No information given	No information available	No information available	N/A	N/A
<b>TOTAL</b>		<b>51</b>	<b>7.75</b>				

<b>NEIMAN MARCUS</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
<b>Section 1: Company Policy (6)</b>							
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	0	No information given	No information available	No information available	<a href="http://phx.corporate-ir.net/External.File?item=UGFyZW50SUQ9NTcwN3xDaGlsZEIEPS0xfFR5cGU9Mw==&amp;t=1">http://phx.corporate-ir.net/External.File?item=UGFyZW50SUQ9NTcwN3xDaGlsZEIEPS0xfFR5cGU9Mw==&amp;t=1</a> <a href="http://www.sec.gov/Archives/edgar/data/1358651/000110465914042656/a14-13408_1sd.htm">http://www.sec.gov/Archives/edgar/data/1358651/000110465914042656/a14-13408_1sd.htm</a>	The Code of Ethics passed in 2013 does not address the issue of conflict minerals. The SEC filing also does not mention a company policy on conflict minerals. (See Relevant 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



<b>NEIMAN MARCUS</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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
<b>Section 2: Engagement with Suppliers (10)</b>							
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
c) Has the company published the number of refiners in its supply chain?	1.5 points	0	No information given	No information available	The Company identified fifty-seven (57) of its vendors/suppliers who are required to complete the Template and Certification process outlined in 1.4 above."	<a href="http://www.sec.gov/Archives/edgar/data/1358651/000110465914042656/a14-13408_1sd.htm">http://www.sec.gov/Archives/edgar/data/1358651/000110465914042656/a14-13408_1sd.htm</a>	The company identified 57 suppliers who filled out the conflict minerals template, but the company did not publish 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

<b>NEIMAN MARCUS</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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
<b>Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region (9)</b>							
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	<a href="http://www.resolv.org/site/ppa/participation/">http://www.resolv.org/site/ppa/participation/</a>	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 forum, 2 for multiple forums	0	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	<a href="http://www.responsiblejewellery.com/members/certified-members/">http://www.responsiblejewellery.com/members/certified-members/</a> <a href="http://www.responsiblemining.net/participants/">http://www.responsiblemining.net/participants/</a>	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	<a href="http://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/">http://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/</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	N/A	No points were awarded on the basis of information provided by RSN.
<b>Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region (26)</b>							

<b>NEIMAN MARCUS</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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 region of Africa (the Democratic Republic of the Congo or any country bordering)?	6 points: 4 for 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
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 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	0	No information given	No information available	No information available	N/A	N/A
<b>TOTAL</b>		<b>51</b>	<b>0</b>				

QVC, INC.	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
<b>Section 1: Company Policy (6)</b>							
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	No information given	"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 abuses...QVC does not directly source any 3TG from mines, smelters, or refiners, and is in most cases many levels removed from these market participants. We, therefore, require the cooperation of our suppliers with this policy to enable us to meet our SEC compliance obligations."	No information available	<a href="http://www.qvc.com/QVCConflictMineralsPolicy.tent.html">http://www.qvc.com/QVCConflictMineralsPolicy.tent.html</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 Areas?	2 points	2	No information given	No information available	"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 for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including the Supplement on Tin, Tantalum and Tungsten and the Supplement on Gold (Second Edition 2013) (the 'OECD Guidance') (from form SD)... We intend to take the following additional steps on in-scope products for 2014 to mitigate the risk that the 3TG contained in and necessary to the products we manufacture or contract to manufacture benefits armed groups in the DRC Region."	<a href="http://www.sec.gov/Archives/edgar/data/1254699/000110465914043237/a14-14505_1ex1d02.htm">http://www.sec.gov/Archives/edgar/data/1254699/000110465914043237/a14-14505_1ex1d02.htm</a>	N/A

QVC, 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 the sourcing and sales of gold?	1 point	1	No information given	No information available	"We communicated the Conflict Minerals Policy in writing to selected personnel from senior management, legal, accounting, internal audit, compliance, product management, project management, and merchandising. We established a mechanism for employees, suppliers and other interested parties to report concerns regarding, or suspected violations of, the Conflict Minerals Policy."	<a href="http://www.sec.gov/Archives/edgar/data/1254699/000110465914043237/a14-14505_1ex1d02.htm">http://www.sec.gov/Archives/edgar/data/1254699/000110465914043237/a14-14505_1ex1d02.htm</a>	N/A
d) Has the company provided interactive employee training on the policy?	1 point	1	No information given	No information available	"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 consultants retained by our parent company, Liberty Interactive Corporation ('Liberty'), to assist us with our compliance efforts."	<a href="http://www.sec.gov/Archives/edgar/data/1254699/000110465914043237/a14-14505_1ex1d02.htm">http://www.sec.gov/Archives/edgar/data/1254699/000110465914043237/a14-14505_1ex1d02.htm</a>	N/A
<b>Section 2: Engagement with Suppliers (10)</b>							
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	"The Conflict Minerals Policy also was communicated in writing to Suppliers, and posted on our website."	<a href="http://www.sec.gov/Archives/edgar/data/1254699/000110465914043237/a14-14505_1ex1d02.htm">http://www.sec.gov/Archives/edgar/data/1254699/000110465914043237/a14-14505_1ex1d02.htm</a>	N/A

<b>QVC, INC.</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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	1.5	No information given	No information available	See chart on pg. 6 of SEC filing	<a href="http://www.sec.gov/Archives/edgar/data/1254699/000110465914043237/a14-14505_1ex1d02.htm">http://www.sec.gov/Archives/edgar/data/1254699/000110465914043237/a14-14505_1ex1d02.htm</a>	N/A
d) Has the company published the names of its refiners in its supply chain?	1.5 points	1.5	No information given	No information available	See chart on pg. 6 of SEC filing	<a href="http://www.sec.gov/Archives/edgar/data/1254699/000110465914043237/a14-14505_1ex1d02.htm">http://www.sec.gov/Archives/edgar/data/1254699/000110465914043237/a14-14505_1ex1d02.htm</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
<b>Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region (9)</b>							
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	<a href="http://www.resolve.org/site/ppa/participation/">http://www.resolve.org/site/ppa/participation/</a>	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 forum, 2 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
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	<a href="http://www.responsiblejewellery.com/members/certified-members/">http://www.responsiblejewellery.com/members/certified-members/</a> <a href="http://www.responsiblemining.net/participants/">http://www.responsiblemining.net/participants/</a>	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	<a href="http://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/">http://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/</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	<a href="http://www.sourcingnetwork.org/partners/">http://www.sourcingnetwork.org/partners/</a>	No points were awarded on the basis of information provided by RSN.
<b>Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region (26)</b>							
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 region of Africa (the Democratic Republic of the Congo or any country bordering)?	6 points: 4 for 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

<b>QVC, INC.</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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 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	0	No information given	No information available	No information available	N/A	N/A
<b>TOTAL</b>		<b>51</b>					



<b>ROSS-SIMONS</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
<b>Section 1: Company Policy (6)</b>							
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	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 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?	1 point	0	No information given	No information available	Did not file	N/A	N/A
d) Has the company provided interactive employee training on the policy?	1 point	0	No information given	No information available	Did not file	N/A	N/A
<b>Section 2: Engagement with Suppliers (10)</b>							

<b>ROSS-SIMONS</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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 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 sourcing conflict-free gold from Congo?	3 points: 2 for 1 meeting, 3 for 2+ meetings	0	No information given	No information available	Did not file	N/A	N/A
<b>Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region (9)</b>							
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	Did not file	<a href="http://www.resolve.org/site/ppa/participation/">http://www.resolve.org/site/ppa/participation/</a>	N/A

<b>ROSS-SIMONS</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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 forum, 2 for multiple forums	0	No information given	No information available	Did not file	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	Did not file	<a href="http://www.responsiblejewellery.com/members/certified-members/">http://www.responsiblejewellery.com/members/certified-members/</a> <a href="http://www.responsiblemining.net/participants/">http://www.responsiblemining.net/participants/</a>	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	<a href="http://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/">http://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/</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	Did not file	<a href="http://www.sourcingnetwork.org/partners/">http://www.sourcingnetwork.org/partners/</a>	No points were awarded on the basis of information provided by RSN.
<b>Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region (26)</b>							

<b>ROSS-SIMONS</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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 region of Africa (the Democratic Republic of the Congo or any country bordering)?	6 points: 4 for sourcing from the Great Lakes region, 2 additional for sourcing specifically from 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 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	0	No information given	No information available	Did not file	N/A	N/A
<b>TOTAL</b>		<b>51</b>	<b>0</b>				

SEARS HOLDINGS	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
<b>Section 1: Company Policy (6)</b>							
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	0	No information given	"Sears Holdings is committed to ensuring that all tin, tungsten, tantalum and gold ('Conflict Minerals') contained in our private label and exclusive products are obtained in a socially responsible manner. As such, we are working to implement and ensure compliance with Section 1502 of the Dodd-Frank Street Reform and Consumer Protection Act, enacted by Congress in 2010, related to trade in Conflict Minerals."	No information available	<a href="http://www.searsholdings.com/compliance/conflict-minerals/">http://www.searsholdings.com/compliance/conflict-minerals/</a>	No points were awarded as the company's policy only requires that products be obtained in a "socially responsible manner" and does not go so far as to cover armed conflict or gross human rights abuses.
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	1	No information given	No information available	"The Domestic Operating Companies' due diligence framework was designed in conformance with the Organization for Economic Cooperation and Development's ('OECD') Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and accompanying Supplements."	<a href="http://www.searsholdings.com/compliance/conflict-minerals/">http://www.searsholdings.com/compliance/conflict-minerals/</a> <a href="http://www.sec.gov/Archives/edgar/data/1310067/000119312514221945/d735055dex102.htm">http://www.sec.gov/Archives/edgar/data/1310067/000119312514221945/d735055dex102.htm</a>	Half credit was given because the company designed its due diligence framework in conformance with the OECD guidance but did not commit to implementing the OECD guidance in the future.

SEARS HOLDINGS	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
<b>Section 2: Engagement with Suppliers (10)</b>							
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	<p>Introductory emails were sent to Tier 1 Suppliers describing the compliance requirements and requesting conflict minerals information. Suppliers were also provided access to training.</p> <p>-Following the initial introductions, up to three reminder emails were sent to each non-responsive Supplier requesting that the EICC-GeSI Template be completed.</p> <p>-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 information about the Domestic Operating Companies Conflict Minerals Compliance Program, an explanation of why the information was being collected, a review of how the information</p>	<p><a href="http://www.sec.gov/Archives/edgar/data/1310067/000119312514221945/d735055dex102.htm">http://www.sec.gov/Archives/edgar/data/1310067/000119312514221945/d735055dex102.htm</a></p>	No points were awarded because, while this supplier communication was excellent, it did not appear to relate directly to the policy. Clarification was sought from Sears but the company did not respond.

<b>SEARS HOLDINGS</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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	<a href="http://www.conflictreesourcing.org/about/members-and-collaborations/">http://www.conflictreesourcing.org/about/members-and-collaborations/</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
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
<b>Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region (9)</b>							
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	<a href="http://www.resolv.org/site/ppa/participation/">http://www.resolv.org/site/ppa/participation/</a>	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 forum, 2 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
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	<a href="http://www.responsiblejewellery.com/members/certified-members/">http://www.responsiblejewellery.com/members/certified-members/</a> <a href="http://www.responsiblemining.net/participants/">http://www.responsiblemining.net/participants/</a>	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	<a href="http://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/">http://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/</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	<a href="http://www.sourcingtonet.org/partners/">http://www.sourcingtonet.org/partners/</a>	N/A
<b>Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region (26)</b>							
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>SEARS HOLDINGS</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
b) Is the company sourcing verifiably conflict-free gold from the Great Lakes region of Africa (the Democratic Republic of the Congo or any country bordering)?	6 points: 4 for 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
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 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	0	No information given	No information available	No information available	N/A	No points were awarded on the basis of information provided by RSN.
<b>TOTAL</b>		<b>51</b>	<b>1</b>				

<b>SIGNET JEWELERS</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
<b>Section 1: Company Policy (6)</b>							
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	"Yes"	<p>"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.</p> <p>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 membership Code of Practices and Chain of Custody standards.</p> <p>Signet is also active in cross-sector coalitions and working groups that reach beyond the jewelry industry to ensure that companies respect human rights and avoid contributing to armed 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, and the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502, relating to our supplies of gold.</p> <p>Based on these international standards and guidance, Signet conducted extensive research and consulted with many of our suppliers to develop the Signet Responsible Sourcing Protocol ('SRSP'). The purpose of the SRSP is to outline practical procedures that will reasonably ensure any gold, tin, tantalum, or tungsten, defined as 'conflict minerals' by OECD and the SEC, in products supplied to Signet are recognized as conflict-free (see SRSP for conflict-free gold and SRSP for conflict-free 3Ts). The SRSP is established as company policy effective 1/1/2013 and requires all suppliers to certify and independently verify that supplies to Signet are compliant with the SRSP."</p>	<p>"As reflected in the Conflict Minerals Policy, Signet is fully committed to the responsible sourcing of its products and the respect of human rights, and Signet expects the same from its suppliers around the world. Signet continually strives to assure its customers, employees, investors and other stakeholders that its supply chain avoids action that may directly or indirectly finance armed conflict and serious human rights violations around the world, including in particular the Democratic Republic of Congo and its adjoining countries."</p>	<p><a href="http://www.signetjevelers.com/corporate-responsibility/responsible-sourcing/">http://www.signetjevelers.com/corporate-responsibility/responsible-sourcing/</a></p> <p><a href="http://www.sec.gov/Archives/edgar/data/832988/000119312514218377/d734028dex102.htm">http://www.sec.gov/Archives/edgar/data/832988/000119312514218377/d734028dex102.htm</a></p>	N/A

<b>SIGNET JEWELERS</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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	2	"Yes"	"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, and the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502, relating to our supplies of gold."	"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 Areas (Second Edition) in all material respects.'"	<a href="http://www.signetjewelers.com/corporate-responsibility/responsible-sourcing/">http://www.signetjewelers.com/corporate-responsibility/responsible-sourcing/</a> <a href="http://www.sec.gov/Archives/edgar/data/832988/000119312514218377/d734028dex102.htm">http://www.sec.gov/Archives/edgar/data/832988/000119312514218377/d734028dex102.htm</a>	In addition to the available information, Signet Jewelers receive full credit for committing to implement OECD Due Diligence Guidelines based on Enough Project observations of public presentations by Signet representatives.
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	1	"[Yes]; through regular team meetings, emails, and company briefings."	No information available	No information available	N/A	N/A
d) Has the company provided interactive employee training on the policy?	1 point	1	"Yes"	No information available	"[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 measures..."	<a href="http://edgar.sec.gov/Archives/edgar/data/832988/000119312514218377/d734028dex102.htm">http://edgar.sec.gov/Archives/edgar/data/832988/000119312514218377/d734028dex102.htm</a>	N/A
<b>Section 2: Engagement with Suppliers (10)</b>							

<b>SIGNET JEWELERS</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
a) Has the company communicated its conflict gold policy to its suppliers (at minimum, 1st-tier suppliers)?	1 point	1	"[Yes]; by email, webinars, phone, visits."	"The Signet Responsible Sourcing Protocol ('SRSP') is a guide for Signet's suppliers to ensure that gold provided to Signet is conflict-free. The requirements in the SRSP apply to all gold products (finished and components), and to all products containing gold, with the exception of watches. Suppliers are required to certify the gold supplied to Signet, either by certification of all gold manufacture and supply, or, if this is not possible, by segregating manufacture and supply of gold to Signet from manufacture and supply of gold to other customers."	"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 Guidance and Good Delivery List, and the Conflict-Free Smelter List published by the CFSI (see sections 2.B.1a and 2.B.2a below). These strategies also include: ... facilitating training and education for suppliers and other stakeholders on the SRSPs and other due diligence measures..."	<a href="http://www.signetjewelers.com/files/download/Signet-Responsible-Sourcing-Protocol-for-Gold-revised-September-2013.pdf">http://www.signetjewelers.com/files/download/Signet-Responsible-Sourcing-Protocol-for-Gold-revised-September-2013.pdf</a>  <a href="http://www.sec.gov/Archives/edgar/data/832988/000119312514218377/d734028dex102.htm">http://www.sec.gov/Archives/edgar/data/832988/000119312514218377/d734028dex102.htm</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	"[Yes]; not exclusively these three, but amongst other certified sources not stated by The Enough Project."	No information available	No information available	<a href="http://www.sec.gov/Archives/edgar/data/832988/000119312514218377/d734028dex102.htm">http://www.sec.gov/Archives/edgar/data/832988/000119312514218377/d734028dex102.htm</a>	Points were not awarded because the company's commitment was not exclusively to the three aligned audits listed.

<b>SIGNET JEWELERS</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
c) Has the company published the number of refiners in its supply chain?	1.5 points	0	"No"	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"	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	3	"[Yes]; in our regular briefings with suppliers, we have positively advocated sourcing from 'covered countries' providing in those sources are certified and consistent with our protocols."	No information available	No information available	N/A	N/A
<b>Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region (9)</b>							
a) Is the company a member of the Public Private Alliance for Responsible Minerals Trade (PPA)?	3 points	0	"No"	No information available	No information available	<a href="http://www.resolve.org/site-ppa/participation/">http://www.resolve.org/site-ppa/participation/</a>	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 forum, 2 for multiple forums	2	"Yes"	Yes, multiple.	No information available	N/A	Based on Enough Project knowledge and attendance of OECD forums.

<b>SIGNET JEWELERS</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
c) Is the company a member of RJC or the Initiating 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	<a href="http://www.responsiblejewellery.com/members/certified-members/">http://www.responsiblejewellery.com/members/certified-members/</a> <a href="http://www.signetjewelers.com/corporate-responsibility/responsible-sourcing/">http://www.signetjewelers.com/corporate-responsibility/responsible-sourcing/</a>	N/A
d) Has the company been certified by the RJC Chain-of-Custody Certification program?	2 points	0	"No"	"Signet fully supports the RJC's membership Code of Practices and Chain of Custody standards."	N/A	<a href="http://www.signetjewelers.com/corporate-responsibility/responsible-sourcing/">http://www.signetjewelers.com/corporate-responsibility/responsible-sourcing/</a> <a href="http://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/">http://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/</a>	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	<a href="http://www.sourcinenetwork.org/partners/">http://www.sourcinenetwork.org/partners/</a>	No points were awarded on the basis of information provided by RSN.
<b>Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region (26)</b>							

<b>SIGNET JEWELERS</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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	3	"No"	Signet committed to participate in the Solutions for Hope Gold process and participated in the first meeting.	No information available	N/A	Based on information from a representative of Resolve, the coordinating organization of the Solutions for Hope Gold project.
b) Is the company sourcing verifiably conflict-free gold from the Great Lakes region of Africa (the Democratic Republic of the Congo or any country bordering)?	6 points: 4 for sourcing from the Great Lakes region, 2 additional for sourcing specifically from Congo	2	"[Yes]...Through [the London Bullion Market Association]."	"Suppliers to Signet are recommended to ensure their gold supplies are from current LBMA 'good delivery' refineries (see gold list at <a href="http://www.lbma.org.uk">www.lbma.org.uk</a> )."	"Because Signet's SRSP for 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 or adjoining countries, all of which were refined by refiners which are certified under the terms of LBMA as 'conflict free' after an independent audit obtained by LBMA and therefore are 'DRC conflict-free.'"	<a href="http://www.signetjewelers.com/files/documents/downloads/Signet-Responsible-Sourcing-Protocol-for-Gold-revised-September-2013.pdf">http://www.signetjewelers.com/files/documents/downloads/Signet-Responsible-Sourcing-Protocol-for-Gold-revised-September-2013.pdf</a>	Partial credit was given because the company has reason to believe they source gold that may have originated from the Great Lakes region but 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

<b>SIGNET JEWELERS</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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	0	"No"	No information available	No information available	N/A	N/A
<b>TOTAL</b>	<b>51</b>	<b>18</b>					



TARGET	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
<b>Section 1: Company Policy (6)</b>							
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	"We remain committed to 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 efforts as part of our social compliance program."	"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 production or functionality of the product."	"We adopted a policy relating to the sourcing of 3TG (the 'Conflict Minerals Policy'). The Conflict Minerals Policy, publicly available at <a href="https://corporate.target.com/corporate-responsibility/responsible-sourcing/social-compliance/labor-and-human-rights">https://corporate.target.com/corporate-responsibility/responsible-sourcing/social-compliance/labor-and-human-rights</a> , is described in the Form SD that includes this Conflict Minerals Report as an exhibit."	<a href="https://corporate.target.com/corporate-responsibility/responsible-sourcing/social-compliance/labor-and-human-rights">https://corporate.target.com/corporate-responsibility/responsible-sourcing/social-compliance/labor-and-human-rights</a> <a href="https://corporate.target.com/corporate-responsibility/responsible-sourcing/social-compliance/labor-and-human-rights">/Archives/edgar/data</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 Areas?	2 points	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..."	<a href="https://corporate.target.com/corporate-responsibility/responsible-sourcing/social-compliance/labor-and-human-rights">https://corporate.target.com/corporate-responsibility/responsible-sourcing/social-compliance/labor-and-human-rights</a> <a href="https://www.sec.gov/Archives/edgar/data/27419/000110465914043078/a14-13835_1ex1d02.htm">https://www.sec.gov/Archives/edgar/data/27419/000110465914043078/a14-13835_1ex1d02.htm</a>	N/A

TARGET	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	1	No information given	No information available	"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 available for review by team members who have questions. Selected team members also participated in conferences, benchmarking and workshops relating to the Conflict Minerals Rule."	<a href="https://www.sec.gov/Archives/edgar/data/27419/000110465914043078/a14-13835_1ex1d02.htm">https://www.sec.gov/Archives/edgar/data/27419/000110465914043078/a14-13835_1ex1d02.htm</a>	N/A
d) Has the company provided interactive employee training on the policy?	1 point	1	No information given	No information available	"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 available for review by team members who have questions. Selected team members also participated in conferences, benchmarking and workshops relating to the Conflict Minerals Rule."	<a href="https://www.sec.gov/Archives/edgar/data/27419/000110465914043078/a14-13835_1ex1d02.htm">https://www.sec.gov/Archives/edgar/data/27419/000110465914043078/a14-13835_1ex1d02.htm</a>	N/A
<b>Section 2: Engagement with Suppliers (10)</b>							

TARGET	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	1	No information given	No information available	"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 Policy. We also adopted a policy requiring the maintenance of our 3TG-related records for a minimum of five years on a computerized database and requested that the Service Provider store records in its possession on our behalf to comply with this policy."	<a href="https://www.sec.gov/Archives/edgar/data/27419/000110465914043078/a14-13835_1ex1d02.htm">https://www.sec.gov/Archives/edgar/data/27419/000110465914043078/a14-13835_1ex1d02.htm</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	"Target expects that each of the vendors with which it contracts to manufacture will: Use smelters certified as being free of Conflict Minerals whenever sourcing 3TG mined in the DRC region."	No information available	<a href="https://corporate.target.com/corporate-responsibility/responsible-sourcing/social-compliance/labor-and-human-rights">https://corporate.target.com/corporate-responsibility/responsible-sourcing/social-compliance/labor-and-human-rights</a>	Despite the company statement, the company does not publicly commit to using one of the conflict-free refiner auditing systems listed.

TARGET	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
c) Has the company published the number of refiners in its supply chain?	1.5 points	1.5	No information given	No information available	"In connection with our due diligence, 48 unique smelters and refiners were identified by our vendors of owned and exclusive brand products in the included merchandise categories as being part of the vendors' supply chains."	<a href="https://www.sec.gov/Archives/edgar/data/27419/000110465914043078/a14-13835_1ex1d02.htm">https://www.sec.gov/Archives/edgar/data/27419/000110465914043078/a14-13835_1ex1d02.htm</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	
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	
<b>Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region (9)</b>							
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	<a href="http://www.resolve.org/site/ppa/participation/">http://www.resolve.org/site/ppa/participation/</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 forum, 2 for multiple forums	0	No information given	No information available	No information available	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	<a href="http://www.responsiblejewellery.com/members/certified-members/">http://www.responsiblejewellery.com/members/certified-members/</a> ; <a href="http://www.responsiblemining.net/participants/">http://www.responsiblemining.net/participants/</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	<a href="http://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/">http://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/</a>	

TARGET	Possible Points	Points	Company Response	Available Information	SEC Filings	Relevant Links	Justification
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	<a href="http://www.sourcingnetwork.org/partners/">http://www.sourcingnetwork.org/partners/</a>	No points were awarded on the basis of information provided by RSN.
<b>Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region (26)</b>							
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 region of Africa (the Democratic Republic of the Congo or any country bordering)?	6 points: 4 for 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	
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) 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	0	No information given	No information available	No information available	N/A	
<b>TOTAL</b>	<b>51</b>	<b>8.5</b>					

<b>TIFFANY &amp; CO.</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
<b>Section 1: Company Policy (6)</b>							
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	No information given	"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 ban would adversely impact the mining communities and businesses operating responsibly in the region."	No information available	<a href="http://be.tiffany.com/CSR/Supply.aspx#p+1-n+1000-c+s+r+t+ni+1-x+pu+f+l-r+hr+ri+mi+pp+">http://be.tiffany.com/CSR/Supply.aspx#p+1-n+1000-c+s+r+t+ni+1-x+pu+f+l-r+hr+ri+mi+pp+</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 Areas?	2 points	1	No information given	No information available	"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 supplements on gold, tin, tantalum, and tungsten."	<a href="https://www.sec.gov/Archives/edgar/data/98246/00009824614000172/ex102.htm">https://www.sec.gov/Archives/edgar/data/98246/00009824614000172/ex102.htm</a>	Half credit was given because, while the company used such guidelines in designing its supply chain policies and procedures, there is not yet a statement of intention for committing to implementing them in the future.

<b>TIFFANY &amp; CO.</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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	1	"We have disseminated the policy to vendors and throughout the company to employees that deal with or address sourcing issues, in the form of direct letters to vendors and internal staff."	No information available	No information available	N/A	N/A
d) Has the company provided interactive employee training on the policy?	1 point	0	The company is working on having a training tool to promote internal and external awareness.	No information available	"In the coming year, the Company expects to take the following steps... creating and distributing enhanced training materials concerning the Company's Conflict Minerals policy and compliance process to Company employees who are most involved in the vendor selection and management processes."	<a href="https://www.sec.gov/Archives/edgar/data/98246/00009824614000172/ex102.htm">https://www.sec.gov/Archives/edgar/data/98246/00009824614000172/ex102.htm</a>	Despite the positive steps that Tiffany expects to take in the coming year, the company has not yet provided interactive training.
<b>Section 2: Engagement with Suppliers (10)</b>							



TIFFANY & CO.	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	1	"Yes, we communicated through direct letters and brought them to the board for adoption - for approval and to promote awareness."	"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."	"Vendor relationships are actively managed through a variety of channels, such as vendor contracts; vendor questionnaires; the Company's Vendor Manual, an educational and training tool and mandate for vendors; and the Company's Social Accountability Program, which supports vendor compliance with the Company's Vendor Code of Conduct and incorporates Company risk assessments, vendor self-assessments, and external audits of vendors."	<a href="http://www.tiffany.com/csr/responsiblesourcing/SupplierResponsibility.aspx">http://www.tiffany.com/csr/responsiblesourcing/SupplierResponsibility.aspx</a> <a href="http://edgar.sec.gov/Archives/edgar/data/98246/00009824614000172/form10k.htm">http://edgar.sec.gov/Archives/edgar/data/98246/00009824614000172/form10k.htm</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	3	No information given	"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."	No information available	<a href="http://www.tiffany.com/csr/responsiblesourcing/SupplierResponsibility.aspx">http://www.tiffany.com/csr/responsiblesourcing/SupplierResponsibility.aspx</a>	N/A

<b>TIFFANY &amp; CO.</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
c) Has the company published the number of refiners in its supply chain?	1.5 points	1.5	No information given	No information available	See chart in SEC filing	<a href="https://www.sec.gov/Archives/edgar/data/98246/00009824614000172/ex102.htm">https://www.sec.gov/Archives/edgar/data/98246/00009824614000172/ex102.htm</a>	N/A
d) Has the company published the names of its refiners in its supply chain?	1.5 points	1.5	No information given	No information available	See chart in SEC filing	<a href="https://www.sec.gov/Archives/edgar/data/98246/00009824614000172/ex102.htm">https://www.sec.gov/Archives/edgar/data/98246/00009824614000172/ex102.htm</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 given	No information given	No information given	N/A
<b>Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region (9)</b>							
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	<a href="http://www.responsiblemining.net/ppa/participation/">http://www.responsiblemining.net/ppa/participation/</a>	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 forum, 2 for multiple forums	2	Yes, multiple.	No information available	No information available		Based on Enough Project knowledge and attendance 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	<a href="http://www.responsiblemining.net/participants/">http://www.responsiblemining.net/participants/</a> <a href="http://www.responsiblejewellery.com/members/certified-members/">http://www.responsiblejewellery.com/members/certified-members/</a>	N/A

<b>TIFFANY &amp; CO.</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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	<a href="http://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/">http://www.responsiblejewellery.com/members/chain-of-custody-certified-entities/</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	<a href="http://www.sourcengnetwork.org/partners/">http://www.sourcengnetwork.org/partners/</a>	No points were awarded on the basis of information provided by RSN.
<b>Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region (26)</b>							
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	3	No information given	Tiffany committed to participate in the Solutions for Hope gold process and participated in the first meeting.	No information available	<a href="http://solutions-network.org/">http://solutions-network.org/</a>	Based on information from a representative of Resolve, the coordinating organization of the Solutions for Hope Gold project.
b) Is the company sourcing verifiably conflict-free gold from the Great Lakes region of Africa (the Democratic Republic of the Congo or any country bordering)?	6 points: 4 for 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

<b>TIFFANY &amp; CO.</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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 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	4	"A grant for more than \$50,000 will be awarded to DDI/PAC project on formalizing the artisanal mining sector in eastern Congo."	No information available	No information available	N/A	N/A
<b>TOTAL</b>		<b>51</b>					

<b>WAL-MART</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
<b>Section 1: Company Policy (6)</b>							
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	"Walmart has taken a number of measures to meet our conflict minerals compliance obligations, including establishing a global policy that supports the responsible sourcing of conflict minerals."	"Walmart expects its product suppliers to actively support Walmart's conflict minerals compliance efforts by: adopting responsible mineral sourcing policies in: 1) dealing with their supply chains that are consistent with this policy and the OECD guidance 2) supplying products to Walmart that do not contain 3TG minerals that have been sourced under circumstances that contribute to or support human rights violations in the DRC 3) providing evidence to support their representations as to the conflict minerals status of their products upon request."	"...the Company has adopted a Global Conflict Minerals Compliance Policy (the "Conflict Minerals Policy") that sets forth the Company's expectations that its third-party suppliers will actively support the Company's Conflict Minerals compliance efforts..."	<a href="http://corporate.walmart.com/policies/conflict-minerals-policy">http://corporate.walmart.com/policies/conflict-minerals-policy</a> <a href="http://www.sec.gov/Archives/edgar/data/104169/000010416914000029/formsd.htm">http://www.sec.gov/Archives/edgar/data/104169/000010416914000029/formsd.htm</a>	N/A

<b>WAL-MART</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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	1	"We and other retailers and manufacturers have invested considerable resources to survey supply chains and create policies and procedures consistent with OECD guidelines that will allow us to comply with thereporting requirements under Dodd-Frank Section 1502 by May 31, 2014."	"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 Citizenship Coalition (EICC) and the Global e-Sustainability Initiative (GeSI) to be more specific to retail suppliers. We have also engaged third party firms with specialized experience in various aspects of conflict minerals to assist Walmart in the development and implementation of our program, which includes due diligence activities consistent with the Organisation for Economic Co-operation and Development (OECD) Guidelines."	No information available	<a href="http://corporate.walmart.com/policies/conflict-minerals-policy">http://corporate.walmart.com/policies/conflict-minerals-policy</a>	Half credit was given here because, while the company used such guidelines in designing its supply chain policies and procedures, there is not yet a statement of intention for committing to implementing them 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	0	"We should be awarded additional points for...1(c)..."	No information available	No information available	N/A	No credit was given because no information about this issue is found on the company website or SEC report, and no information was provided by the company despite repeated requests.

<b>WAL-MART</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
d) Has the company provided interactive employee training on the policy?	1 point	0	"We should be awarded additional points for...1(d)..."	No information available	No information available	N/A	No points were awarded because no information was given about what steps the company took to work on this issue, despite repeated requests from the Enough Project.
<b>Section 2: Engagement with Suppliers (10)</b>							
a) Has the company communicated its conflict gold policy to its suppliers (at minimum, 1st-tier suppliers)?	1 point	0	"We should be awarded additional points for...2(a)..."	No information available	"The expectations of the Company under its Conflict Minerals Policy were communicated to the Suppliers."	<a href="http://www.sec.gov/Archives/edgar/data/104169/000010416914000029/formsd.htm">http://www.sec.gov/Archives/edgar/data/104169/000010416914000029/formsd.htm</a>	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 several communications, clarify by what means their policy was communicated.

<b>WAL-MART</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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	"We should be awarded additional points for survey question 2(b) because our Conflict Minerals Policy states that we expect all supply chain sources to be proven to be conflict-free."	No information available	No information available	N/A	Even though Walmart's Conflict Minerals policy states that they expect all supply chain sources to be proven to be conflict-free, the company does not publicly commit to sourcing only from one of the certification programs 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
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	"We should be awarded additional points for...2(e)."	No information available	No information available	N/A	No points were awarded because no information was given about what steps the company took to work on this issue, despite repeated requests from the Enough Project.
<b>Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region (9)</b>							



<b>WAL-MART</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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	<a href="http://www.resolv.org/site-ppa/participation/">http://www.resolv.org/site-ppa/participation/</a>	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 forum, 2 for multiple forums	0	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	<a href="http://www.responsiblejewellery.com/members/certified-members/">http://www.responsiblejewellery.com/members/certified-members/</a> <a href="http://www.responsiblemining.net/participants/">http://www.responsiblemining.net/participants/</a>	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	<a href="http://www.sourcingtonetwork.org/partners/">http://www.sourcingtonetwork.org/partners/</a>	No points were awarded on the basis of information provided by RSN.
<b>Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region (26)</b>							

<b>WAL-MART</b>	<b>Possible Points</b>	<b>Points</b>	<b>Company Response</b>	<b>Available Information</b>	<b>SEC Filings</b>	<b>Relevant Links</b>	<b>Justification</b>
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 region of Africa (the Democratic Republic of the Congo or any country bordering)?	6 points: 4 for 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
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 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	0	No information given	No information available	No information available	N/A	N/A
<b>TOTAL</b>	<b>51</b>	<b>3</b>					