

Enough Project
Electronics companies ranked by progress on conflict minerals

Company	Trace (18 possible points)				Audit (22 possible points)						Certify (6 possible points)			Stakeholder Engagement (2 possible points)		Legislation (7 possible points)			TOTAL	Percentage	Comments
	a	b	c	d	a	b	c	d	e	f	a	b	c	a	b	a	b	c			
HP	2	1	2	0	0	0	1	2	1	0	2	2	0	1	1	2	1	0	17.5	32%	Hewlett-Packard (HP) is in the highest tier of companies. The company's success is due to its supply chain investigations, leadership within the EICC-GeSI Extractives Work Group responsible for the tantalum smelter auditing program, and its progressive stance on legislation and certification. HP published its suppliers in 2008 and 2009, the first in the industry to do so, and it did not suffer competitive disadvantage as a result. HP's endorsement of the Dodd-Frank Wall Street reform bill was helpful in aiding the passage of the bill. Although not in the current survey, HP also has advocated for strong U.S. regulations to implement these provisions, having signed on to the multi-stakeholder submission to the SEC with Enough and other NGOs on strong due diligence guidelines. HP still has room for improvement at the auditing and certification level. HP has a progressive policy on internally and externally auditing suppliers, including 104 supplier visits in 2009, but this does not yet include audits of 3TG suppliers.
Intel	2	0	2	0	0	0	1	4	0	0	1	0	0	1	1	0	1	0	13	24%	Intel is in the highest tier of companies and has proven itself as an industry leader in investigating supply chains, having completed on-site reviews of 11 tantalum smelters in six different countries. These site visits were some of the first of their kind in the industry, and other companies subsequently followed suit. Intel has been very active within the industry working group audit process, co-chairing the EICC-GeSI Extractives Work Group that is responsible for the tantalum smelter auditing program. Intel has also published its top 50 production and capital suppliers, a significant step towards transparency. After traveling to Congo on behalf of the EICC-GeSI, Intel participated in a summit in Nairobi, Kenya in October 2010 that was part of the process to develop a multi-stakeholder certification process for conflict minerals. Moving forward, Intel should continue to work on internal audits of smelters, publish its list of refiners, and work to help make the U.S. regulations on conflict minerals effective.
Motorola	0	0	2	0	0	0	1	4	0	0	1	0	0	1	1	2	0	0	12	22%	Motorola finished in the top tier due to the company's leadership in co-chairing the EICC-GeSI Extractives Work Group, visiting smelters, and its active support of the conflict mineral regulation legislation. Motorola's initial engagement in certification is also positive. After traveling to Congo on behalf of the EICC-GeSI, Motorola participated in a summit in Nairobi, Kenya in October 2010, to develop a multi-stakeholder certification process for conflict minerals and has made several positive statements about the need for certification. We would welcome further Motorola action on its internal audits and investigations into and publishing of its own refiners, as other companies have begun to do.
Nokia	1.5	0	2	0	0	0	1	2	0	0	1	0	0	1	1	0	1	0	10.5	19%	Nokia is in the top tier of companies for having investigated its tin, tantalum, and tungsten suppliers and having been an active participant in the industry-wide EICC-GeSI Extractives Work Group in charge of tantalum smelter audits. Nokia also visited two of its smelters and required that all of the company's key suppliers map their respective supply chains for 3TG minerals in their components down to smelter and the source or origin. However, for all its efforts, Nokia has yet to gain third party verification for these investigations or publish information on them, as other companies have. Positively, Nokia participated in a summit on certification in Nairobi in October 2010 and we would welcome Nokia's increased role on certification, including conflict minerals in its internal audits, and working to help make the SEC regulations effective.
Microsoft	2	0	0	0	2	0	1	2	0	0	0	0	0	1	0	0	0	0	8	15%	Microsoft is ranked in the top tier of companies. Microsoft is pioneering an internal audit system to deal with conflict minerals, which would be an industry first and support a new procurement policy. Following a supply chain investigation into its 3TG suppliers, Microsoft is piloting a system to fully identify its smelters. The company is also active in the EICC-GeSI Extractives Work Group. However, there is room for Microsoft to improve in mandating third-party independent verification of the auditing process it is creating as well as in making publicly available information about suppliers and audit standards. We would also welcome Microsoft's work in aiding with the development of a certification process, as well as working to help make the SEC regulations effective.

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Dell	0	0	2	0	0	0	1	2	0	0	0	0	0	1	1	0	1	0	8	15%	Dell is in the top tier of companies, for having been an active participant in the EICC-GeSI Extractives Work Group in charge of tantalum smelter audits and visiting two of its smelters. Dell also is helping advocate for strong regulations to the conflict minerals legislation by signing on to the multi-stakeholder submission to the SEC with Enough and other NGOs on strong due diligence guidelines. However, Dell fell slightly behind other companies in the top tier because it has not completed investigations of conflict minerals in its supply chains. We would welcome further action from Dell on developing internal audits on conflict minerals, publishing its suppliers as other companies have begun to do, and continued support for a multi-stakeholder certification process.
RIM	0.5	0	0	0	0	0	1	2	0	0	0	0	0	1	1	2	0	0	7.5	14%	RIM is in the middle tier of companies. Like the other companies in this group, RIM derives its points from being a participant within the EICC-GeSI Extractives Work Group smelter validation program. In addition, RIM issued statements in support of U.S. conflict mineral legislation in November 2009, which aided in the passage of the bill. RIM has started tracing initiatives within its own supply chain on tantalum, and we would welcome further investigative action and publishing of smelters. RIM fell slightly behind for not having yet visited its smelters, as other companies' have. RIM has also not audited its 3TG suppliers on conflict minerals. Being based in Canada and having been active on US legislation, RIM is also well positioned to support recent Canadian legislation on conflict minerals.
Acer	2	0	0	0	0	0	1	2	0	0	0	0	0	1	0	0	1	0	7	13%	Acer is in the middle tier of companies and has notably conducted survey of its supply chain for 3TG materials back to the level of country of origin, with an impressive 90 percent response rate. Acer has also put in place a policy that requires suppliers to have traced 3TG materials back to source of origin and has raised the conflict minerals issue with its suppliers at internal conferences. Acer joined the EICC-GeSI Extractives Work Group in 2009, but has not visited or audited its smelters, nor has it engaged in the development of a certification process. As a company based close to several smelters in East Asia, we would welcome Acer's increased engagement with and audits of smelters on conflict minerals, where it may have an added advantage.
Apple	2	0	0	0	0	0	1	2	0	0	0	0	0	1	1	0	0	0	7	13%	Apple is also in the middle tier, primarily for its laudable efforts in conducting supplier investigations in regards to conflict minerals and its active role in the EICC-GeSI Extractives Work Group. Apple did not respond to the survey and the results here are based on meetings with Apple and with published information. We are informed that Apple's senior management is committed to a solution on conflict minerals. Apple sends auditors to its first tier suppliers on environmental and labor standards and publishes the results of these audits, which is high bar to set relative to industry standards. However, these audits do not yet focus on conflict minerals, and Apple should apply the same format to the audits of its 3TG smelters and suppliers. Apple also fell slightly behind the top companies because of its silence on the U.S. Conflict minerals legislation. Furthermore, Apple should publish its supply chain tracing efforts and its smelters, in order to ensure transparency and increase public confidence. Finally, we would welcome Apple's increased role in helping build a comprehensive certification process for conflict minerals, as well as working to help make the SEC regulations effective.
Philips	1	0	0	0	0	0	1	2	0	0	0	0	0	1	1	0	0	0	6	11%	Philips is in the middle range of companies, for having been an active participant in the EICC-GeSI Extractives Work Group smelter validation program. Philips conducts extensive audits of its suppliers to mitigate social and environmental damage, having conducted over 800 audits last year, but it has not yet conducted these on conflict minerals. Philips has conducted tantalum and tin investigations, but has yet to research its tungsten and gold suppliers, as well as publish information on its smelters. Philips has been active with the European Commission and Dutch government to engage in reporting on conflict minerals, but did not weigh in on the U.S. legislation. We would welcome Philips' further efforts on certification, as well as working to help make the SEC regulations effective.

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Samsung	0	0	0	0	0	0	0	1	2	0	0	0	0	0	0	0	0	0	0	0	0	0	4	7%	Samsung is in the middle tier for recently starting work on conflict minerals. The company joined the EICC-GeSI Extractives Work Group in 2009. The company started asking suppliers to conduct self assessments on conflict minerals, but these fall short of audits and are not in-depth as the supplier investigations of other companies. We would welcome further supplier investigations and audit verification steps. Samsung fell behind the top companies for not engaging in the legislative process. We would also very much welcome Samsung's further engagement with the EICC, publishing of its smelters, working to help make the SEC regulations effective, and increased work on certification. As a company based closed to several smelters in East Asia, we would welcome Samsung's increased engagement with and audits of smelters on conflict minerals, where it may have an added advantage.
LG	0.5	0	0	0	0	0	0	1	2	0	0	0	0	0	0	0	0	0	0	0	0	0	3.5	6%	LG is in the middle tier of companies for having recently initiated efforts to address the conflict minerals issues. It joined the EICC-GeSI Extractives Work Group in August 2010 and began efforts to investigate tantalum in its supply chains. However the company has yet to map its supply chain for 3TG materials or show efforts to verify its smelters. LG also fell short for not weighing in positively on the the U.S. conflict minerals legislation. As a company based closed to several smelters in East Asia, we would welcome LG's increased engagement with and audits of smelters on conflict minerals, where it may have an added advantage.
Sony Ericsson	0	0	0	0	0	0	0	1	2	0	0	0	0	0	0	0	0	0	0	0	0	0	3	5%	Sony-Ericsson is in the middle tier of companies for being a member of the EICC-GeSI Extractives Work Group and being involved in the smelter validation program. Sony Ericsson has specifically engaged suppliers on conflict minerals but has not attempted to verify the assurances of its suppliers. We would welcome further investigations beyond these vague assurances, and the publishing of their smelters, as other companies have begun to do. The company has shown willingness in the past to adjust supply-chain management in order to mitigate negative social and environmental impacts in a timely manner. Sony Ericsson should apply these same standards to conflict minerals in its internal audits. The company did not respond to Enough's survey nor to our attempts to meet with the company.
IBM	0	0	0	0	0	0	0	1	2	0	0	0	0	0	0	0	0	0	0	0	0	0	3	5%	IBM is in the middle tier of companies. IBM is a participant in the EICC-GeSI Extractives Work Group's smelter validation program and has briefed its direct suppliers on conflict minerals, but has not yet mapped or investigated for 3TG minerals, as the leading companies have done. IBM fell behind the top companies for not weighing in on the U.S. conflict minerals legislation, and should help to ensure the SEC regulations are effective. We would welcome a more comprehensive tracing investigation of 3TG materials, publication of its smelters, and internal audits of suppliers of 3TG materials.
Lenovo	0	0	0	0	0	0	0	1	2	0	0	0	0	0	0	0	0	0	0	0	0	0	3	5%	Lenovo is in the middle tier of companies. The company, through membership in the EICC-GeSI Extractives Work Group and has participated in the smelter validation program. However, Lenovo has yet to map its supply chain or publish its suppliers of 3TG materials. Lenovo stakeholder engagement has been minimal, and it fell behind the top companies on its silence on the U.S. conflict minerals legislation. As a company based closed to several smelters in East Asia, we would welcome Lenovo's increased engagement with and audits of smelters on conflict minerals, where it may have an added advantage.
SanDisk	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	4%	SanDisk is in the lower tier of companies. We were pleased to receive our first response from Sandisk on November 23, 2010, but had not received responses to our previous attempts to contact the company beginning in February 2009. Sandisk recently conducted a supplier review on conflict minerals, but has not disclosed the contents or results of this survey. SanDisk has yet to audit its suppliers, and it is not yet a member in the EICC-GeSI or the Extractives Work Group. We would welcome the company's further steps on tracing, auditing, and helping develop a certification system.
Toshiba	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	2%	Toshiba is in the lower tier of companies. It has started to take steps to investigate one gold and one tin supplier and is in the process of investigation with other major suppliers of metals. We would welcome greater investigation and publishing of the smelters that Toshiba sources from, as other companies have done. Toshiba is not a member of the EICC-GeSI or the Extractives Work Group. The company has a group procurement policy, but it makes no mention of minerals, metals, audits, or policy on conflict or payments to armed groups. It also fell behind for its silence on the legislation. As a company based closed to several smelters in East Asia, we would welcome Toshiba's increased engagement with and audits of smelters on conflict minerals, where it may have an added advantage. We encourage Toshiba to play an increased role on tracing, auditing, and certification.

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Panasonic	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0%	Panasonic is in the lower tier of companies and to our knowledge has not undertaken any efforts to trace, audit, or help certify its products as being conflict-free. It does not mention conflict minerals in its company sustainability report, nor is it a member of the EICC-GeSI or the Extractives Work Group. The company did not engage on conflict minerals legislation. Panasonic responded to a letter from Enough in 2009 but did not respond to subsequent meeting requests or to the survey. As a company based closed to several smelters in East Asia, we would welcome Panasonic's increased engagement with and audits of smelters on conflict minerals, where it may have an added advantage. We look to Panasonic to play an increased role on tracing, auditing, and certification.
Canon	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0%	Canon is in the lowest tier of companies and to our knowledge has not undertaken any efforts to trace, audit, or help certify its products as being conflict-free. It does not mention conflict minerals in its company sustainability report, nor is it a member of the EICC-GeSI or the Extractives Work Group. The company did not engage on conflict minerals legislation. Finally, Canon has not responded to Enough's repeated attempts to contact the company beginning in February 2009. As a company based closed to several smelters in East Asia, we would also welcome Canon's increased engagement with and audits of smelters on conflict minerals, where it may have an added advantage. We look to Canon to play an increased role on tracing, auditing, and certification.
Sharp	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0%	Sharp is in the lower tier of companies and to our knowledge has not undertaken any efforts to trace, audit, or help certify its products as being conflict-free. It does not mention conflict minerals in its company sustainability report, nor is it a member of the EICC-GeSI or the Extractive Work Group. The company did not engage on conflict minerals legislation. Finally, Sharp has not responded to Enough's repeated attempts to contact the company beginning in February 2009. As a company based closed to several smelters in East Asia, we would also welcome Sharp's increased engagement with and audits of smelters on conflict minerals, where it may have an added advantage. We look to Sharp to play an increased role on tracing, auditing, and certification.
Nintendo	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0%	Nintendo is in the lower tier of companies and to our knowledge has not undertaken any efforts to trace, audit, or help certify its products as being conflict-free. It does not mention conflict minerals in its company sustainability report, nor is it a member of the EICC-GeSI or the Extractives Work Group. The company did not engage on conflict minerals legislation. Finally, Nintendo has not responded to Enough's repeated attempts to contact the company beginning in February 2009. As a company based closed to several smelters in East Asia, we would also welcome Nintendo's increased engagement with and audits of smelters on conflict minerals, where it may have an added advantage. We look to Nintendo to play an increased role on tracing, auditing, and certification.