



SASHA LEZHNEV/ENOUGHPROJECT

Taking Conflict Out of Consumer Gadgets

Company Rankings on Conflict Minerals 2012

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August 2012



enough

The project to end genocide and crimes against humanity

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ON THE COVER: Tin ore from Walikale, the minerals capital of eastern Congo. February 2012.

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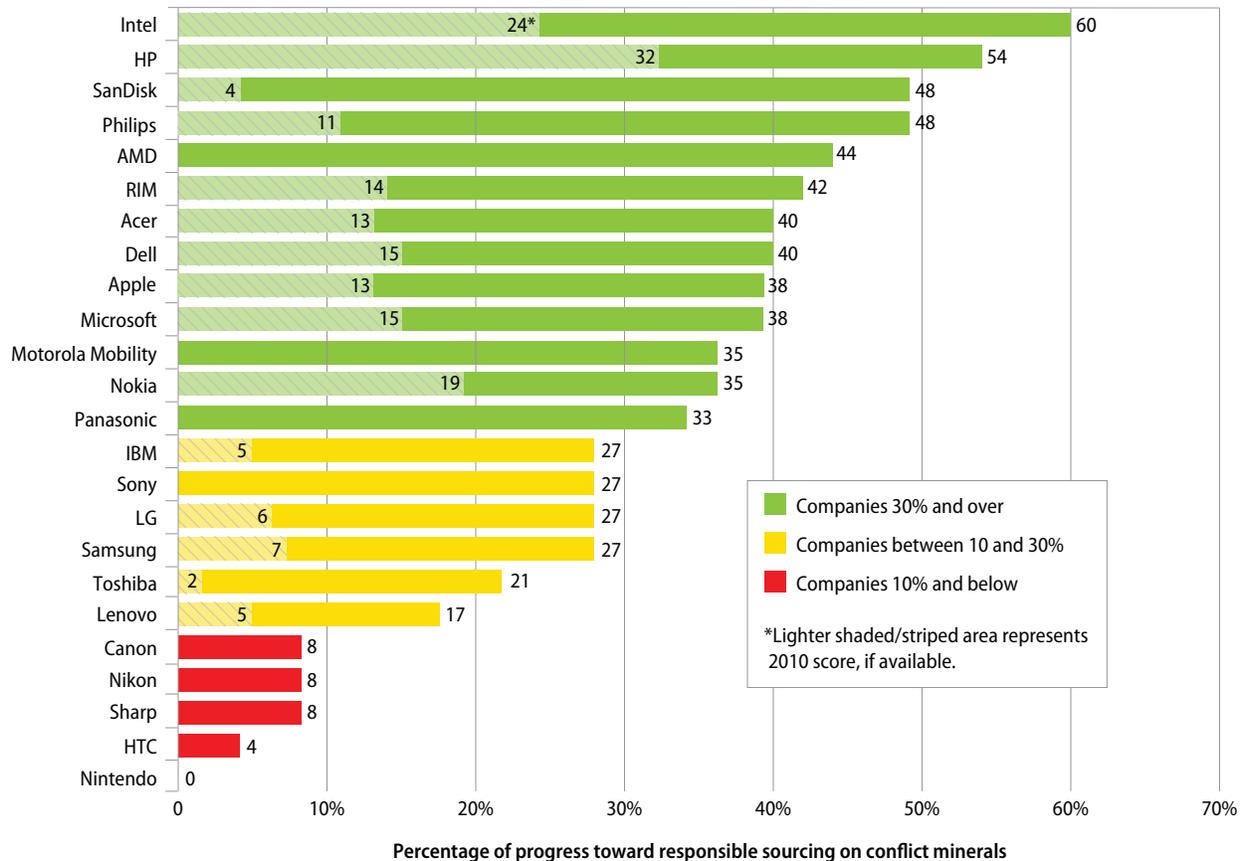
Introduction and summary

Leading electronics companies are making progress in eliminating conflict minerals from their supply chains, but still cannot label their products as being conflict free. Since Enough's last corporate rankings report on conflict minerals in December 2010, a majority of leading consumer electronics companies have moved ahead in addressing conflict minerals in their supply chains—spurred by the conflict minerals provision in the Dodd-Frank Wall Street Reform and Consumer Protection Act and growing consumer activism, particularly on college campuses. Most firms have improved their scores from the 2010 rankings, but some laggards still remain.

In particular, four leading companies—Intel, Motorola Solutions, HP, and Apple—have been pioneers of progress. These firms have moved forward to develop solutions despite delays in the legislative rule-making process by the U.S. Securities and Exchange Commission, or SEC—an excuse that many other companies have used to explain their lack of significant action. These leading companies have developed conflict minerals programs that have paved the way for other companies to follow. These include a smelter auditing program and an aid project for lagging smelters, direct sourcing and aid projects to help Congo develop a clean minerals trade, and tracing projects to dig deeply into their supply chains to identify precise numbers of smelters. Several other companies—SanDisk, Philips, Sony, Panasonic, RIM, and AMD, in particular—have significantly improved their efforts by surveying their suppliers, piloting due diligence, and joining the smelter audit program.

At the other end of the spectrum, laggards are also standing out due to lack of progress and communication. For example, despite growing public awareness about this issue and significant industry movement, Nintendo has made no known effort to trace or audit its supply chain. Sharp, HTC, Nikon, and Canon are taking initial steps to join industry efforts, but their progress remains far behind industry leaders. Additionally, other industries that use conflict minerals—automotive, jewelry, mining, and industrial machinery—are finally taking initial steps to tackle the problem because of the legislation, but remain far behind the consumer electronics firms.

Electronics companies ranked by progress on conflict minerals



Areas of progress:

The majority of electronics companies surveyed have made progress in three main areas.

- **Tracing:** Most major electronics companies have traced further along their supply chains to find the sources of their minerals. Starting with Apple, seven firms have now publicly identified the number of smelters involved in their supply chains and nearly all consumer electronics companies are undertaking similar mapping projects.
- **Auditing:** Many more smelters are now being audited by third-party auditors through the industrywide Conflict-Free Smelter, or CFS, program. Twenty smelters have already passed the audits, including the majority of tantalum smelters and two Chinese smelters.¹
- **Certification:** A group of companies is starting to help Congo develop a clean minerals trade that helps communities. Seven end-user companies are sourcing from conflict-free mines in Congo, and 16 electronics companies have joined the Public Private

Alliance for Responsible Minerals Trade, or PPA. The PPA is a partnership created by the U.S. government, NGOs, and corporate partners to support the development of a clean-minerals supply chain from Congo and the surrounding region. Motorola Solutions, Intel, and HP also helped get the smelter-audit program to accept conflict-free minerals from Congo and the region that are certified by a regional government body. This means that greater amounts of clean minerals from Congo will go into electronics products next year as mines begin to be certified.

These steps have had an effect on the ongoing conflict in Congo, as armed groups are currently only able to generate approximately 35 percent of what they made from the trade in tin, tantalum, and tungsten, or 3 Ts, two years ago.² Conflict tin, a trade susceptible to illegal smuggling through Rwanda and previously worth over \$115 million per year to armed groups, has become increasingly difficult to sell due to audits that now recognize the physical differences between Congo's and Rwanda's tin—making the Congolese material difficult to relabel as Rwandan.³

Despite this progress, gold smuggling remains a major problem and the new Rwandan-backed M23 rebel group is creating instability. But tech company action has been at the center of the long-term progress in creating solutions within mineral supply chains, as the electronics audit program only accepts minerals that are fully traced back to their mines of origin and are conflict-free, i.e. excluding conflict minerals.

While companies engaged in finding solutions should be recognized for their efforts, there are still significant gaps where improvement in conflict mineral policies can be made.

Five main gaps:

- **Ensuring that “conflict free” is not Congo free:** Companies that use the 3 Ts and gold in their products should strive to invest in a way that creates shared value for both companies and communities. A handful of companies are helping Congo develop a clean trade, but some companies are taking a hands-off approach to instruct their suppliers to not buy minerals from Congo and the region. This approach helps cut off armed groups but leaves mining communities in Congo behind. In order to accomplish both goals, more firms should join the Public-Private Alliance, or PPA, invest in projects to source clean minerals that help communities in eastern Congo where it is safe to do so, and support livelihood projects to help mining communities.
- **Buying from conflict-free smelters:** For smelter audits to have a meaningful impact, companies should require their suppliers to only purchase from conflict-free smelters. Otherwise, smelters will have little incentive to source responsibly. Four companies have put such requirements in place but have not begun enforcing them. For example, Apple states its policy in its annual code of conduct: “As the EICC/GeSI initiative

[Electronic Industry Citizenship Coalition's conflict-free smelter audit program] completes smelter audits in tantalum, tin, tungsten, and gold, we will require our suppliers to source from these conflict-free certified smelters." Other companies should adopt similar policies and begin enforcing these policies through audits of their first-tier and other suppliers to only source from conflict-free smelters. There are enough conflict-free tantalum smelters to now begin enforcement on tantalum. By proactively putting in place a policy on this subject and enforcing it, companies can help speed up the audit process and incentivize smelters to take part in and pass the audits.

- **Getting all the smelters audited:** Within the last 18 months, the conflict-free smelter audit program has certified 12 tantalum, two tin, and six gold smelters as conflict free. To date, no tungsten smelters have been designated conflict free. In 2012 Intel, HP, and GE put together a program to help smelters cover audit costs, but more effort is needed. Tech companies and other industry customers should do more outreach directly to smelters.
- **Getting other industries more involved:** Most companies outside the large consumer electronics industry—jewelry, automakers, aerospace, and industrial machinery—are not playing nearly as much of a role in the situation. This is part of the reason for low smelter participation in auditing programs. In order to incentivize more smelters to participate in the audits, more of their customers need to be involved, particularly from these other industries. Companies from the jewelry, automotive, industrial machinery, and aerospace industries should join the CFS audit program, the PPA, and begin direct conflict-free sourcing programs similar to Solutions for Hope to help Congo develop a clean minerals trade.
- **Making certification a process that civil society and governments participate in:** The conflict-free audit program is still mainly run by industry despite the positive step of adding one independent expert onto its oversight committee. In line with other certification regimes like the Fair Labor Association or the Extractive Industries Transparency Initiative, the audit program should be governed by a joint board made up of industry, civil society, and governments. EICC-GeSI should amend the CFS audit review committee to have full and equal multistakeholder participation, similar to the PPA governance board. Expanding control beyond industry would prevent the program from being hamstrung by rules that do not allow the publication of the names of failed smelters for competitive industry reasons.

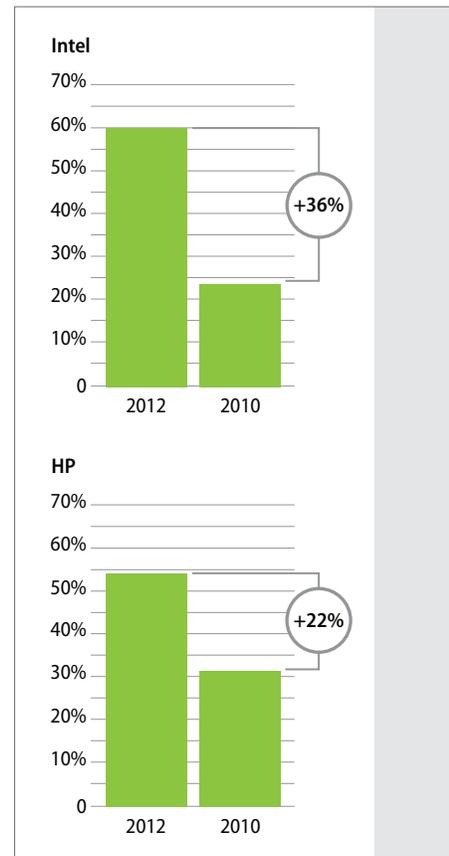
Outstanding company efforts:

Two companies surveyed stood out ahead of the pack in their extraordinary leadership.

- **Intel** was the first company to publicly commit to making a fully conflict-free product within a deadline—a conflict-free microprocessing chip by 2013. It has taken several other major steps under the leadership of Chief Operating Officer Brian Krzanich. Intel chairs the review committee for the smelter audit program, co-chairs the industry association work group on conflict minerals, has visited 50 smelters, co-founded a program with HP and GE to pay for smelter audits, and has visited eastern Congo to better understand how the company can have a positive impact.
- **HP** has been active at multiple levels. When enough smelters are available it will require its suppliers to use only audited, conflict-free smelters. HP also co-founded the smelters incentive program. HP has been active by helping Congo develop a clean minerals trade, serving on the governance committee of the PPA, purchasing minerals from Congo, traveling to eastern Congo to see local systems firsthand, and being the most active corporate participant in a diplomacy work group on Congo. It also signed onto the multistakeholder group on strong SEC regulations.

Several other companies deserve special mention for notable actions on conflict minerals:

- **Apple** was the first company to publicly identify the number of smelters in its supply chain—175—and require its suppliers to use only audited, conflict-free smelters, when enough are available. It also leads a smelter training program.
- **AMD**, maker of computer chips, has been a leading public policy voice on conflict minerals. AMD testified at the SEC’s roundtable on the rules for the conflict minerals provision in the Dodd-Frank law, co-chairs the multistakeholder group on the SEC rules, and published articles calling for more government action on conflict minerals.
- **Sony** led a partnership to get Japanese electronics companies more involved on conflict minerals, shepherding a process that led Japan’s tech association to sign a memorandum of understanding, or MOU, with the U.S.-based EICC to participate in the smelter audit program.
- **Toshiba, Apple, HP, and Nokia** put new policies in place to require all of their suppliers to use only audited, conflict-free smelters, once enough are available.
- **Nokia, Panasonic, Philips, AMD, HP, and Microsoft** are piloting internationally agreed-upon due diligence guidance on conflict minerals in line with the Organization for Economic Co-operation and Development, or OECD, due diligence model.



- **SanDisk** is the most improved company, being the first company to publish the names of its smelters and begin audits of its suppliers that cover conflict minerals.
- **Acer, Intel, LG, Panasonic, and Philips** also publicly identified the number of smelters in their supply chains, helping transparency.
- **Microsoft, GE, Panasonic, and Motorola Solutions** stood up and issued statements against a lawsuit that the U.S. Chamber of Commerce, a powerful industry lobby group, had threatened against the SEC on its regulations for the Dodd-Frank law on conflict minerals. The lawsuit could effectively overturn the law.
- **Motorola Solutions**, not ranked in our survey because of its decreased size following a company split, has been very active in helping Congo develop a clean minerals trade, co-chairing the industry working group on conflict minerals, pioneering the Solutions for Hope project, and advocating for stronger government action.
- **AMD, Nokia, AT&T, Dell, RIM (Blackberry), GE, Sony, Sprint, HP, Telefonica, Intel, Toshiba, Verizon, and Motorola Solutions** are helping Congo develop a clean minerals trade by joining the Public Private Alliance on Responsible Minerals.
- **Motorola Mobility, HP, Intel, Motorola Solutions, Nokia, RIM (Blackberry), and Bosch** joined the Solutions for Hope program to develop a clean minerals trade in Congo. Component manufacturer **AVX** deserves credit for setting up this program, and component maker **Kemet** has set up a similar program in Katanga.
- **IBM** helped traceability in Congo and Rwanda by donating a database and training for the Congo-Rwanda tracing system called iTSCi.

Other industries: Starting work but lagging behind overall

If companies from other industries that use conflict minerals were to be surveyed and ranked using our criteria, the majority would likely earn few to zero points. Enough only ranked large consumer electronics companies because of our extensive engagement with them over the past three years and a basis on which to differentiate their actions. But the involvement of other industries is also important and there has been nascent engagement with the largest companies in six other key sectors: automotive, aerospace, jewelry, mining, industrial machinery, and retail.

With a few exceptions, responses from most companies in these other key industries have thus far been tepid. There are several outstanding issues that must be addressed to more effectively handle the conflict-mineral issue. Based on the passage of the Dodd-Frank legislation, companies and associations in some of these sectors have begun to

take steps to eliminate conflict minerals from their supply chains. However, many of the companies are making similar excuses to the ones that electronics companies made four years ago—that their supply chains are too complex or that it is impossible to tell where the minerals come from. For example, a representative at Kraft Foods said, “[W]hen I started talking to my procurement people about [where conflict minerals may be in Kraft’s products] ... it was getting a bit overwhelming, and I was getting a little bit [sic] hyperventilating when we were going through all of that.”⁴ The efforts of Intel and the leading tech companies since 2009 have shattered those excuses and have proven that concrete supply chain action is possible—starting with tracing suppliers back to smelters, auditing smelters, and contributing to certification in Congo and the region.

The following represent notable efforts by companies outside the electronics industry:

- **Ford and GE** are carrying out pilot projects to test the due diligence guidance that was agreed on in a 2010 OECD-led multistakeholder process. Ford and GE have also signed on to the PPA, along with several electronics-component companies.⁵ GE co-founded the smelter incentive program with Intel and HP.
- **Boeing, Northrop Grumman, United Technologies, and Lockheed Martin** are piloting the OECD guidance. These companies should publish the steps they have taken to implement the guidance.
- **Signet Jewelers, GE, and the automotive association AIAG** have signed on to the conflict-free smelter audit program. It is a straightforward process for other companies to sign on to the program at www.conflictreesmelter.org. These companies should publish information on how they plan to use the program, for example requiring suppliers to source from conflict-free smelters.
- **The jewelry association Responsible Jewelry Council** has begun an audit program for jewelers called “Chain-of-Custody Certification.” However, the audits only cover company policies and management systems, rather than going through a jewelers’ actual purchases of gold or other metals to check whether they are from certified refiners and/or conflict-free mines. More work must be done, therefore, to combat the flows of conflict gold.
- **The mining association World Gold Council** has drafted a conflict-free standard that is being piloted by some mining companies but it is not yet finalized.
- **The gold refiners’ association London Bullion Marketing Association** is developing an audit program for gold refiners in coordination with the electronics association smelter audits. The protocol for the audits has not yet been drafted, however, despite the long amount of time that has passed since the passage of Dodd-Frank.

Many more steps remain for these stakeholders to catch-up to the progress of the electronics industry. There must be assurance that smelters are audited, supply chains are traced to smelters, materials are sourced from conflict-free mines in Congo and the region, and the OECD guidance is implemented.

Consumer activism and legislation

Much of the progress made by companies on conflict minerals since 2010 is owed to the U.S. legislation passed on conflict minerals as well as the rapid growth of the conflict-free consumer movement. Since it was signed into law by President Barack Obama in July 2010, Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act has brought the conflict-minerals issue to the attention of executives of the approximately 6,000 companies that will be affected by it.⁶ Although its final rules have not yet been issued, the law, in broad terms, requires all companies that use the 3 Ts or gold in their products to trace the origins of these minerals and conduct due diligence, including an audit, if they originate in Congo or surrounding countries. Companies across the board have cited that the law has sped up their actions on this issue, as they trace through their supply chains in preparation for compliance with the legislation.

Consumer activism has also played a significant role in helping move tech companies on conflict minerals over the past three years. Companies ranked in the top and middle tiers have been directly targeted by activists and the leadership of these companies has impacted the entire industry, pushing forward progress on the ground. It is also not a coincidence that no other industry affected by the law has gone as far as the consumer electronics sector in its action on conflict minerals; this is largely due to electronics companies having been the main target for consumer activists.

Over the past three years the conflict-free movement has demanded that companies support federal legislation on conflict minerals and strong rules for the law. Consumer activists at college campuses, faith-based groups, socially responsible investment groups, and other civic associations have also asked companies to publish company policies on this issue, join industry and multistakeholder groups such as the EICC and the PPA, and invest in cleanly sourced minerals from the region that benefit local communities.

Through the passage of conflict-free resolutions at the university, city, and state levels and through direct consumer action, activists have called on companies to assume responsibility for the minerals in their supply chains, and the final products they produce. As a result, certain companies have taken major steps forward and have helped create a framework for a minerals sector in Congo that will benefit communities rather than armed groups.

The delay by the SEC to release rules and regulations for company reporting, as prescribed in Section 1502 of the Dodd-Frank Act, has been a roadblock for progress on the

ground in Congo. But due to targeted consumer pressure, companies have begun to take the necessary steps forward to cleanly source from Congo. As a result of initiatives taken by Motorola Solutions and its consortium—as well as by electronics component manufacturer Kemet—legitimate, conflict-free mining is underway just south of the war-torn Kivu provinces, proving that it can be done in Congo. Following this lead, a consortium of Dutch companies is planning a similar project in South Kivu. Further, activists asked companies to publicly express their support for Section 1502 and against the threatened lawsuit by the U.S. Chamber of Commerce. Since then, four companies have voiced their opposition to the lawsuit threat and called for the swift issuance of rules by the SEC, which announced in July that it will vote on final regulations on August 22. The release of these final rules should result in more significant steps by the industry in the coming months.

The advances made over the past three years demonstrate the ability of electronics companies to set industrywide standards, drive forward progress on the ground, and move other actors—namely the U.S. government—toward prioritizing Congo. The significant movement by companies into the first and second tiers of the rankings shows their interest in showing leadership on issues that the public cares deeply about—again establishing the importance of a conflict-free movement among consumers.

Consumer activism will continue to serve as a motivator for corporate action that demonstrates the market potential for ethical products as well as an effective entry point for a national and international movement dedicated to peace in Congo.

Conclusion and recommendations: getting to conflict-free

Despite the progress made in the past year by both governments and industry, a long road still lies ahead. The exploitation of Congo's mineral resources continues to exacerbate conflict and instability on the ground and consumers are still largely in the dark as to whether or not their products are conflict free. It will take a holistic effort by multiple governments and industries to regulate the flow of illegal conflict minerals. The driver of that effort must remain the demand of the conscious consumer.

The solution for creating an accountable and durable system must come from policies driven down through supply chains by responsible industry actors, as well as stakeholder governments working to find solutions towards, peace, stability, and economic development in central Africa. In the coming year there a number of actionable steps industry actors can take to do their part:

- 1. Moving ahead with clean minerals from Congo:** In order to help Congo develop a clean minerals trade more quickly, more firms should join the Public-Private Alliance on Responsible Minerals Trade. Companies should invest in projects similar to “Solutions for Hope” to source clean minerals that help communities in eastern Congo and support livelihood projects to help mining communities.

2. **Ensuring that more smelters get audited:** Electronics companies should do more outreach directly to smelters and other industry customers need to conduct outreach to smelters as well.
3. **Making sure companies are buying from clean smelters:** Companies should proactively require their suppliers to only purchase from conflict-free smelters once enough are available and begin enforcing these policies through audits of their first-tier suppliers.
4. **Getting the other industries on board:** Companies from the jewelry, automotive, industrial machinery, and aerospace industries should join the CFS audit program, the PPA, and begin direct conflict-free sourcing programs similar to Solutions for Hope to help Congo develop a clean minerals trade.
5. **Making conflict-free certification a transparent process:** The industry group EICC-GeSI should amend the Conflict-Free Smelter audit review committee to have full multistakeholder participation made up of industry, civil society, and governments, similar to the PPA governance board or other certification regimes such as the Fair Labor Association or the Extractive Industries Transparency Initiative.
6. **Preventing the legislation from being overturned and fully implement it:** More companies from all industries that use conflict minerals should issue statements making it clear that they do not support the U.S. Chamber of Commerce's threat to sue the Securities and Exchange Commission on the conflict-minerals rules, building on the forward-looking statements from Microsoft, GE, Panasonic, and Motorola Solutions. They should also fully implement the legislation through tracing and auditing programs.

Annex: Outline and criteria for scorecard⁷

The conflict-minerals trade from eastern Congo can end through a combination of companies, governments, and consumers taking action to trace, audit, and certify their minerals supply chain. The Enough Project scored electronics companies based upon a set of these criteria, as well as wider actions that would help to break the link between the minerals trade and conflict in Congo. Reasonable timelines are needed to successfully achieve these actions.

The full company responses are available at <http://www.raisehopeforcongo.org/company-rankings/detailed-responses.pdf>.

- **Trace:** Companies must determine the precise sources of the minerals/metals used in their products. Efforts to develop rigorous means of ensuring that the origin and production volume of minerals are transparent are reviewed.
- **Audit:** Companies should have detailed examinations of their mineral supply chains conducted to ensure that a) minerals are not sourced from conflict mines and b) no illegal taxes/bribes are paid to armed groups in Congo. Credible third parties should conduct or verify these audits.
- **Certify:** For consumers to be able to purchase conflict-free electronics made with Congolese minerals, a certification scheme that builds upon the lessons of the Kimberley Process will be required. This would be aimed at setting up conflict-free mines in Congo that help communities. Donor governments and industry should provide financial and technical assistance to galvanize this process.

Criteria⁸

1. **Trace:** Has the company traced its suppliers of the 3 T and gold metals, or 3TG?
 - a. Has the company investigated and come to know precisely which companies refine/smelt⁹ the company's supply of the 3TG, with third-party verification? (For each metal, half-point for investigation, half-point for verification—total of four points possible)
 - b. Has the company published the smelters it uses for the 3TG? (One point for each metal)
 - c. Has the company visited at least two of its smelters and inquired about the use of conflict minerals within the past year? (Two points possible)

- 2. Audit: Does the company have audits conducted of its suppliers of the 3TG metals to determine mine of origin and chain of custody?** (For each question, one point for each metal)
- Does the company have a stated policy of auditing suppliers of the 3TG metals?
 - Has the company conducted internal audits of the procurement practices of 3TG suppliers down to the level of refiner, at least within the past year?
 - Has the company had third-party audits conducted of 3TG suppliers down to the level of refiner, at least within the past year?
 - Has the company participated in the working group for the Conflict-Free Smelter validation program? (Two points possible)
 - Has the company provided financial support for auditing for 3TG? (Four points for support above \$100,000, two points for support between \$50,000 and \$100,000, one point for support below \$50,000)
 - Has the company developed at least one verifiably conflict-free product, with independently audited supply chains all the way to the point of extraction? (Four points possible here, either yes or no)
- 3. Certify: Has the company taken concrete steps to develop an international certification regime for the 3 T and gold minerals, in order to develop conflict-free mines in Congo?** (see definition of certification, for a clarification)¹⁰ (Two points possible for the first two questions, either yes or no)
- Has the company made public statements in support of certification?
 - Does the company have a stated policy of support for certification?
 - Has the company provided financial support for certification? (Two points for support above \$500,000, 1.5 points for support between \$200,000 and \$500,000, one point for support below \$200,000) Participation in the Public Private Alliance would count for points here. The PPA is a step toward certification but is not a certification, as per the definition.
 - Has the company participated in the process for developing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and did it commit to piloting the guidance? (Two points possible)

Additional criteria:

- 4. Stakeholder engagement: Has the company had regular engagement with NGO coalitions on the conflict minerals issue?**
- Has the company met with NGO coalitions regarding inquiries on conflict minerals? (One point possible, yes or no)
 - Has the company held regular, at least bimonthly, communication with NGO coalitions regarding conflict minerals? (One point possible)

- 5. Support for legislation: Has the company publicly supported legislation on conflict minerals?**
- a. Did the company participate in the multistakeholder group of NGOs, companies, and investors to the SEC and sign on to its letters? (Two points possible, yes or no)
 - b. Did the company issue a statement advocating for legislation in Europe on conflict minerals? (Two points possible, yes or no)
 - c. Did the company issue a public statement against the threatened lawsuit against the SEC regulations on conflict minerals by the U.S. Chamber of Commerce? (Two points possible, yes or no)
- 6. Environmental rankings (for informational purposes)**
- a. Greenpeace Green Electronics Ranking
 - b. Newsweek Green Company Rankings

Endnotes

- 1 **Tantalum:** 1. Exotech Inc. (Florida, United States) 2. F & X (China) 3. Gannon & Scott (Arizona, United States) 4. Global Advanced Metals (formerly known as Cabot Supermetals) Pennsylvania, United States 5. H.C. Starck GmbH (Germany) 6. Hi-Temp (New York, United States) 7. Mitsui Mining & Smelting (Japan) 8. Plansee (Austria) 9. RFH (China) 10. Solikamsk Metal (Russian Federation) 11. Telex (Pennsylvania, United States) 12. Ulba Gold (Kazakhstan). **Gold:** 1. Asahi Pretec Corporation (Japan). 2. Ohio Precious Metals (Ohio, United States) 3. Perth Mint Refinery (Australia) 4. Royal Canadian (Canada) 5. Tanaka Kikinzoku Kogyo K.K. (Japan). **Tin:** 2 smelters (names not yet listed, as there are not yet three).
- 2 See Enough Project, “From Congress to Congo: Turning the tide on conflict minerals, closing loopholes, and empowering miners,” forthcoming.
- 3 Ibid.
- 4 Irma Villarreal at Kraft Foods, SEC Roundtable on Section 1502 of the Dodd-Frank Act, October 18, 2011. Full transcript available at <http://www.sec.gov/spotlight/conflict-minerals/conflictmineralsroundtable101811-transcript.txt>
- 5 These include Qualcomm (both OECD and PPA), Foxconn, Alcatel Lucent, Alpha (Cookson), Circuit Connect, Epic Technologies, Flextronics, Foxconn (also in Solutions for Hope), Freescale, KEMET, Oracle, Plansee Group Service GmbH, Siemens AG, Texas Instruments, TriQuint, UNISEM, AIAG (Automotive Industry Action Group), EICC & GeSI (Electronic Industry Citizenship Coalition and Global e-Sustainability Initiative), and IPC (Association Connecting Electronics Industries).
- 6 However, only approximately 1,200 companies will have to file a conflict minerals report, i.e. comply with the rule.
- 7 The full company responses are available at <http://www.raisehopeforcongo.org/company-rankings/detailed-responses.pdf>
- 8 Unless otherwise noted, one point will be awarded for action on each metal in each question. In other words, for criteria 1(a), if a company has investigated and come to know its suppliers for tantalum but not for tin, tungsten, or gold, it will receive one point out of a possible four.
- 9 The term smelter is used here as an overarching term to indicate a metals smelter and/or processing company.
- 10 Certification is understood here as a multistakeholder international process similar to the Kimberley and/or Forest Stewardship Council processes, which would be an international regime to trace, audit, and certify the 3T and gold minerals as being verifiably conflict free.

Enough is a project of the Center for American Progress to end genocide and crimes against humanity. Founded in 2007, Enough focuses on the crises in Sudan, South Sudan, eastern Congo, and areas affected by the Lord's Resistance Army. Enough conducts intensive field research, develops practical policies to address these crises, and shares sensible tools to empower citizens and groups working for change. To learn more about Enough and what you can do to help, go to www.enoughproject.org.

