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The project to end genocide and crimes against humanity



Going for Gold:

Engaging the Jewelry Industry in Responsible
Gold Sourcing in Africa's Great Lakes Region

By Holly Dranginis

November 2014



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Executive Summary

For thousands of years, gold has represented love, tradition, wealth, beauty, and decadence. In the United States alone, these associations cause the gold jewelry industry to be worth more than five billion dollars annually.¹ Halfway around the world, however, the extraction and smuggling of gold serves as an important means of funding for armed groups and army commanders in the deadliest conflict since World War II. In the Democratic Republic of the Congo (“Congo”), violent armed actors mine, tax, and smuggle minerals and perpetrate widespread atrocities. Major supply chain reforms by electronics companies, coupled with the Dodd-Frank Act’s section on conflict minerals and the beginnings of a minerals certification process in the Great Lakes region of Africa, have led to a marked improvement in the security situation at tin, tantalum, and tungsten (3T) mines in Congo.² Over two-thirds of the eastern Congo’s 3T mines are conflict-free today.³ Gold, however, remains a major financial lifeline for armed actors. Ninety eight percent of artisanally mined gold⁴—estimated at a value of between \$383 and \$409 million in 2013—is smuggled out of the country annually, and much of that gold benefits armed commanders.⁵ Gold sold by armed groups into the global supply chain ends up in various products, including jewelry, which is the main overall end user of gold.⁶ Conflict gold thus taints the industry as a whole.

Fortunately, jewelry retailers and consumers can play important roles to help end the conflict gold trade and the suffering it causes, together with the actions of governments. Corporate and consumer behavior can lead to increased demand for responsibly sourced, conflict-free gold and promote investment in positive mining initiatives in the region. As the largest end-user of gold, making up around 45 percent of

1 The Enough Project • www.enoughproject.org

worldwide gold demand,⁷ jewelry companies have the ability to increase demand for conflict-free gold from Congo and the region.

Resolving the conflict gold problem in Congo and the Great Lakes region will require concerted efforts by a number of actors, including governments worldwide, especially the United States, India, China, the United Arab Emirates, and in the region. International and local civil society actors, mining and refining companies, and artisanal mining groups must also play a role. But leadership by the companies that sell jewelry is an indispensable component to changing market demand to favor enterprises that promote peace and prosperity over those that entrench violence and criminality.

The Enough Project has engaged with the largest jewelry retailers in an effort to encourage companies to use their power and resources in more robust, effective ways to support responsible sourcing in Congo and the Great Lakes region of Africa. To highlight leadership opportunities for companies that sell jewelry, Enough surveyed the 14 largest North American jewelry retailers through a detailed questionnaire and direct consultations.⁸ Our survey assessed what policies the retailers have adopted and which actions they have taken to counter the use of conflict gold.

Enough found that two companies in particular—Tiffany & Co. and Signet Jewelers—have demonstrated clear leadership in beginning to address the conflict gold issue by taking proactive steps to set up supply chain controls, contribute to solutions on the ground in Congo, and support the communities affected by mining and violence in Congo. Other companies are starting to follow suit. Cartier, JC Penney, and Target have distinguished themselves by taking important initial steps to implement more responsible policies, such as setting up requirements for their suppliers to source only from conflict-free gold refiners.

With the launch of a new campaign, Enough is highlighting jewelry companies that stand apart from their peers for their work to support responsible gold sourcing in Congo for several reasons. Overall, we aim to help change the financial incentives in the region from violent illegal mining and smuggling to legal, peaceful and prosperous gold mining. To that end, Enough encourages companies to conduct robust supply chain due diligence to eliminate their demand for gold linked to armed violence. Enough recognizes that jewelry companies have an important role to play as part of that overall effort to end the conflict gold trade in Congo and the region because we have seen the beneficial impact of the conflict-free consumer and industry movement on the 3T minerals and now wish to extend similar efforts to gold.

Some actors in the gold industry have taken steps to combat the trade in conflict gold, such as the London Bullion Market Association and World Gold Council auditing programs, but overall much more significant action from industry is needed, particularly from jewelry companies. Through research, policy analysis, and industry engagement, the Enough Project and our advocacy partners, including coalition groups such as the Conflict Free Sourcing Initiative (CFSI) as well as hundreds of students across the United States, United Kingdom, and Canada involved in our Conflict Free Campus Initiative (CFCI), work to recognize and incentivize leadership, help educate and guide consumers toward responsible purchasing decisions, and spur more efforts among retail companies to take action. Emerging industry leaders Tiffany and Signet, along with the companies taking initial action, offer hope that after years of opaque supply chains and violence on the ground, there are a range of actions that jewelry companies can take to ensure they are contributing to a conflict-free gold solution.

Consumers play an indispensable role in shaping company behavior. Consumer-driven demands have influenced and help expand the conflict-free policies and momentum of leading electronics companies. Electronics consumers pushed companies to engage in supporting conflict-free electronics products. Jewelry consumers can now likewise use their influence to encourage jewelry retailers to create conflict-free gold jewelry with gold from Congo and more actively support conflict-free gold initiatives in Congo and the surrounding region.

To guide companies and inform consumers who want to encourage positive behavior, Enough offers the following recommendations for positive company policies and practices:

Recommendations

- 1. Improve supply chain management and due diligence.** Companies should develop transparent policies about their gold sourcing practices and provide grievance mechanisms through which employees, consumers, and suppliers can report policy violations. Jewelry retailers should engage regularly with suppliers throughout their supply chain and invest in programs to make supplier surveying more robust and efficient. Increasing transparency regarding the global supply chain and highlighting best practices is vitally important to improving sourcing practices among retail companies.
- 2. Commit to sourcing from only certified conflict-free gold refiners.** Jewelry companies should publicly commit to sourcing only from certified refiners to support those refiners and also to encourage non-certified refiners to develop responsible sourcing practices. Gold refiners worldwide are increasingly becoming certified as compliant with credible conflict-free auditing programs in line with the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidance.⁹ Compared with six gold refiners certified conflict free by the Conflict Free Smelter Program (CFSP) in 2012,¹⁰ as of today, 52¹¹ refiners have passed credible conflict-free audits. However, there are still many refiners outside the system.
- 3. Join multi-stakeholder conflict-free sourcing groups.** Jewelry companies should participate in multi-stakeholder initiatives such as the Public-Private Alliance on Responsible Minerals Trade (PPA), the OECD Due Diligence Forum, and the Multi-Stakeholder Group of the Responsible Sourcing Network. These groups bring together companies, governments, and nongovernmental organizations to help companies participate in solutions that lead to measureable benefits in Congo and the Great Lakes region. Jewelry companies are underrepresented in these initiatives. Participation can help companies identify interests, challenges, best practices, and new ideas.
- 4. Invest in conflict-free gold sourcing initiatives in Congo.** Jewelry companies should work with their suppliers and with programs such as the USAID-supported Capacity Building for Responsible Minerals Trade and the PPA to set up conflict-free sourcing initiatives in Congo and the region. New initiatives to develop conflict-free gold mines and a formalized market for artisanally-mined gold are critical to changing the conditions that allow violent armed groups to make millions of dollars from illegally mined gold. These initiatives are just beginning to take shape in Congo and the region, but they need much greater support. Leadership in responsible sourcing requires more than just understanding where materials are coming from. It does not mean refusing to source from areas beset by violence.

Leadership instead requires taking proactive steps to improve a responsible minerals trade in high-risk areas.

- 5. Invest in alternative livelihood and community development programs.** Jewelry companies can play a role in developing and supporting livelihood programs and community initiatives that complement large-scale conflict-free mines and an increasingly formalized artisanal gold sector. These livelihoods and community initiatives are necessary to ensure that mining communities have sustainable, diverse sources of income and to guarantee the rights of mining communities, including protection from any potential adverse impact of large-scale mining.

Congo's conflict gold

The people of eastern Congo have endured brutal armed conflict for over two decades, fueled in large part by the region's rich natural resources. Armed groups obtain significant funds to sustain their violent activities by illegally mining and selling minerals—gold, tin, tantalum, and tungsten—that are eventually used to make consumer products sold around the world. The global market has brought revenues that enrich those who control access to gold and perpetrate brutal war crimes against civilians like mass rape, murder, forced displacement, and the recruitment of child soldiers.¹²

Over the past four years, there has been significant progress in reducing armed groups' profits from trade in three out of the four conflict minerals. Today, the International Peace Information Service reports that almost 74 percent of 3T miners are currently working in mines where no armed group involvement has been reported,¹³ in stark contrast to four years ago when, the U.N. Group of Experts found almost every mining deposit in the Kivu provinces under the control of a military group.¹⁴ This shift is due in part to regional reforms in the mining sector and the 2010 Dodd-Frank Wall Street Reform and Consumer Protection Act ("Dodd-Frank law"), requiring all publicly traded companies in the US that use tin, tantalum, tungsten, or gold in their products to report on their measures to determine whether their minerals are linked to armed violence in Congo or the surrounding region.¹⁵ Progress is also due to the leadership of electronics companies like Intel, HP, and Motorola Solutions, that depend on these minerals to make cell phones, computers, and other products and have taken bold steps to support positive change. Several of these companies are not only implementing innovative supply chain assurance programs but also investing in conflict-free sourcing initiatives in Congo. This is the kind of bold, targeted investment jewelry companies should take to help improve security and livelihoods in the gold sector.

Unfortunately, the trade in conflict gold continues to finance armed groups, according to the U.N. Group of Experts on the Congo.¹⁶ Congo's conflict gold is mainly smuggled through the neighboring states of Uganda and Burundi, and then on to Dubai, entering the global market and tainting the entire gold supply chain.¹⁷ The conflict gold trade is linked with artisanally mined gold in eastern Congo— an estimated minimum of eight to 10 tons per year—whereas industrially mined gold by Banro and AngloGold Ashanti/Randgold is currently conflict-free.¹⁸ Congo accounts for just under one percent of the global gold

supply,¹⁹ but the roughly \$400 million worth of revenues from this trade for armed actors helps drive significant violence on the ground in Congo.

The gold standard

The Enough Project surveyed the top 14 jewelry “supersellers”—retailers with the largest sales in North America. We asked questions based on a comprehensive analysis of what factors would best help end conflict gold trading and increase peace and development in eastern Congo and the surrounding region. Those questions covered internal policies and protocols related to supplier engagement, involvement in multi-stakeholder groups and forums, and support to in-region initiatives including conflict-free gold sourcing projects and community development. Most companies responded at least once, and some engaged in more regular dialogue. In addition to direct company responses, we allocated points based on several public information sources, including company websites, public multi-stakeholder forums, and company reports filed with the Securities and Exchange Commission.

Among the 14 companies surveyed, Signet Jewelers and Tiffany & Co. stood out for their leadership and engagement on conflict gold. These leaders have distinguished themselves with numerous concrete actions aimed at improving their own supply chains, the responsible practices of the industry writ large, and the welfare of communities in eastern Congo and the wider Great Lakes region. Cartier, JC Penney, and Target deserve recognition for their initial actions on conflict gold.

Signet Jewelers: Developing sharable supply chain due diligence protocols and sourcing conflict-free gold from Congo

Signet Jewelers is the parent company of several subsidiary jewelers, including the well-known U.S.-based retailers Jared, Kay Jewelers, and Zale, as well as U.K.-based H. Samuel and Ernest Jones. Signet’s stores represent a broad cross-section of the jewelry market, and the jewelry Signet sells is accessible to a wide range of consumer income levels. Signet is the largest specialty jeweler in the United States, United Kingdom, and Canada. Its subsidiary, Kay Jewelers, is the leading middle-market specialty jewelry retailer in the United States.²⁰ Signet has a strong company policy on conflict minerals, which it uses in interactive employee and supplier trainings worldwide. Signet holds strategic meetings with its suppliers to encourage responsible sourcing practices in Congo and the Great Lakes region of Africa, demonstrating a clear commitment to encouraging sourcing and investment in the region, not abandonment. Signet has also demonstrated leadership in multi-stakeholder dialogues. It helped spearhead one of the first events on conflict-free sourcing at a Jewelers of America exposition, at its New York show in 2014, and it has supported other public events on responsible sourcing.

Two initiatives in particular set Signet apart: the development and dissemination of the Signet Responsible Sourcing Protocols (SRSPs), and its efforts to source conflict-free gold from Congo. Signet’s SRSPs “outline the procedures required for its suppliers to ensure that all supplies including gold are conflict-free.”²¹ The protocols, updated regularly, are an innovative, comprehensive set of guidelines the help suppliers trace

their gold supply and communicate its origins to Signet's subsidiary companies. The protocols should, however, require suppliers to only source from conflict-free refiners audited by programs in full accordance with the Conflict-Free Smelter Program. The guidelines, for example, currently list the Dubai Multi Commodities Centre (DMCC)'s auditing program as an acceptable program for supplier certification, yet multiple investigations in early 2014 clearly pointed to problems with the Dubai protocols.²² Protocols like Signet's SRSPs are taking hold in other industries related to tin, tantalum and tungsten, but few address the more difficult task of tracing gold through the supply chain. The work Signet has done to develop rigorous standards have implications beyond their own company practices. By sharing the protocols widely among peer companies and across industries, and by even offering robust trainings on the SRSPs, Signet has demonstrated true leadership in ensuring a range of companies and industries can make good use of the protocols for the improvement of gold supply chain management writ large.

Signet has taken bold steps to ensure its commitment to responsible sourcing supports legitimate business for Congo's gold sector, resisting the temptation to source exclusively outside of Congo to guarantee a purely conflict-free supply chain. Signet knowingly sources gold from Rand refinery, a London Bullion Market Association-certified conflict-free refinery, which sources conflict-free industrial gold from Congo through Banro and AngloGold Ashanti. Signet has developed and shared strategies for sourcing conflict-free gold from Congo. Signet has implemented the strategies as company practices—a bold step none of the other surveyed companies could claim, but that can inspire efforts by all companies.

Tiffany & Co.: Supporting communities and encouraging ethical mining practices

Tiffany & Co. is one of the most recognizable American jewelry brands and a leader in responsible business practices. Tiffany is a founding member of the Initiative for Responsible Mining Assurance (IRMA), a multi-stakeholder group that is developing innovative draft standards on responsible mining practices. These practices have the potential to transform the way mining companies conduct their business, ensuring uniquely high standards related to environmental, human rights, and social impact. These standards are particularly important in eastern Congo, where new large-scale mining projects are important to building a regulated, prosperous, reformed minerals sector, but where the potential for negative environmental and social impact is high, with large civilian populations and rare biodiversity in minerals-rich areas.

Tiffany is responding to the growing needs of mining communities in eastern Congo by dedicating significant funds through the Tiffany & Co. Foundation to support locally-led projects that will help formalize artisanal mining in the area. The foundation is making a grant of over \$50,000 to the Diamond Development Initiative for a 20-month project that will help support local community-based organizations dedicated to working with local mining-affected populations and local gold miners. The project will build capacity in a number of areas, including business planning, mediation, conflict resolution, and improved mining safety. These projects are crucial to helping complement new traceability systems and conflict-free gold sourcing initiatives. Such projects ensure that communities that depend on the current system are able to access and benefit from a more formalized, peaceful mining sector.

Areas of achievement

The overall survey results revealed a number of areas of collective progress in recent years by leading North American jewelry retailers.

- **Company policies:** Eleven out of the 14 surveyed companies have developed publicly accessible policies clarifying their positions and practices related to conflict minerals, including gold. This is critical for employee and consumer education and for aligning internal company practices with agreed-upon standards.
- **Supplier engagement:** Communicating with suppliers and refiners is key to supply chain management and supporting conflict-free gold initiatives in the Great Lakes region. Eight companies demonstrated strong efforts to improve this aspect of their business practices. These companies reached out to suppliers to disseminate their conflict minerals policy, established supplier inquiry mechanisms related to the company's supply chain management, conducted supplier trainings for more responsible sourcing, or carried out some combination of these three activities.
- **Commitments to implement internationally recognized due diligence guidance:** Nine companies have publicly committed to implementing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, an important framework for supply chain due diligence.²³ It is critical that jewelry companies understand and commit publicly to implementing these guidelines, which most have done, thanks in part to the requirements of Conflict Minerals Rule issued by the Securities and Exchange Commission in accordance with Section 1502 of the Dodd-Frank law.

Room for improvement

Despite these significant first steps, much more must be done by jewelers. The Enough Project survey identified the following areas for improvement:

- **Multi-stakeholder initiatives on conflict minerals:** A few important multi-stakeholder initiatives on conflict minerals have established regular dialogues and work projects to bring together diverse actors to discuss best practices and challenges, solve problems, and develop and implement innovative solutions. Jewelry companies are noticeably absent from the majority of these groups, leaving a significant gap in expertise and input. Jewelers should join these initiatives, in particular the Public-Private Alliance on Responsible Minerals Trade (PPA), the OECD Due Diligence Forum, and the Multi-Stakeholder Group of the Responsible Sourcing Network.
- **Participation in conflict-free sourcing initiatives:** Companies can establish conflict-free supply chains while also benefiting communities in Congo by investing in the growth of conflict-free gold sourcing initiatives. The Solutions for Hope and Conflict-Free Tin Initiative for tantalum and tin have demonstrated that companies can source conflict-free minerals from Congo and that prices that Congolese artisanal miners can get for their minerals can increase.²⁴ Jewelers should establish similar

conflict-free gold sourcing programs in Congo to help clean up the regional gold trade. There are multiple emerging opportunities to do so – USAID’s new Capacity Building for Responsible Minerals Trade (CBRMT) project is currently working to help develop conflict-free artisanal gold mines in the Kivus. The PPA has supported conflict-free gold projects with Partnership Africa Canada. Resolve is currently organizing a dialogue around this concept. Jewelers can also engage their suppliers and begin their own initiatives.

- **Supporting communities:** Supply chain due diligence and even investment in conflict-free gold mining initiatives in Congo is incomplete without support to local communities in the region. Large-scale mining has many benefits and some adverse impacts on local communities, as do market changes that make untraceable minerals less lucrative than traceable ones. Jewelry companies’ foundations and corporate philanthropic strategies can play an important role in supporting locally-led development initiatives and ensuring a consultative, rights-based approach to communities affected by mining and sourcing projects of all sizes.

Innovation in progress: New initiatives for conflict-free gold and local development

Refiner certification programs

Over the past five years, industry coalitions, including non-governmental partners, have developed programs to audit the smelters and refiners that constitute the “choke point” of the minerals supply chain. The main programs targeting the choke point are the Conflict-Free Smelter Program (CFSP), the London Bullion Market Association (LBMA) Responsible Gold Guidance, and the World Gold Council Conflict-Free Gold Standard. By having independent third-party auditors verify the conflict-free policies and practices of refiners and mining companies, these auditing programs present a consistent, consolidated approach to vetting and approving the supply chain management. This eases the burden of supply-chain management on retail companies and lends consistency to those management practices across companies and industries. The LBMA’s “Good Delivery” list of refiners must comply with the LBMA Responsible Gold Guidance, which follows the OECD framework for risk assessment, giving companies and suppliers an accessible, transparent way to identify and do business with conflict-free refiners. The CFSP arranges for independent private sector auditors to inspect mines of origin and the chains of custody used by its participating refiners.

Solutions for Hope Gold

The Solutions for Hope network, a group committed to creating responsible sourcing initiatives in Congo, has developed a successful model for conflict-free closed-pipe mines. In 2011, two electronics companies, Motorola Solutions and AVX, teamed up with a smelter, F&X, as well as the mining company MMR and the Congolese artisanal mining cooperative (CDMC), to create the conflict-free Solutions for Hope tantalum mining project in Katanga province. Since 2011, the pilot program has expanded to a new mining area in Rubaya, Masisi, North Kivu, where some of the worst of the violence in Congo has been concentrated. The Solutions for Hope projects demonstrate that conflict-free sourcing from eastern

Congo is possible with the right kind of collaboration and investment. The success of their pilot projects in the tin and tantalum sectors has encouraged the group to expand its application of supply chain assurance solutions to gold. Given the necessary due-diligence practices that the Dodd-Frank law requires for sourcing gold from the DRC, increasing the quantity of legitimate sourcing opportunities by such an expansion could be hugely beneficial to down-stream companies.

Acknowledging the ongoing problem of conflict gold, the Solutions for Hope Network has initiated expansions into the gold sector in a few key ways. The Solutions for Hope Network is working to ensure transparency in transactions between mines and refiners. The network is also expanding access to both large- and small-scale conflict-free mining operations in Congo. These efforts are designed to increase the amount of responsibly sourced gold that is available to the companies seeking it. These efforts also support the economic wellbeing of communities and miners affected by the Solutions for Hope projects.

Formalizing the Artisanal Gold Sector

Artisanal gold mining—small-scale, low-tech surface mining often conducted relatively informally by subsistence miners—accounts for the vast majority of gold mining in eastern Congo. Ninety-eight percent of that artisanally mined gold coming from Congo is smuggled.²⁵ To generate the certifiable conflict-free gold that suppliers will seek, it is critical that the artisanal gold sector undergo reforms to make mining safer and improve the wellbeing of gold miners and the families they support.

The USAID Capacity Building for Responsible Minerals Trade project implemented by Tetra Tech is currently leading efforts in eastern Congo to help begin to formalize the artisanal gold sector. The project is currently considering different models for such an initiative, and it plans to work with the International Organization on Migration, the U.N. mission in Congo, and artisanal mining experts in helping to validate up to 100 more gold mines as conflict-free and help bring more artisanal gold into the formal sector. This will build upon the work of Partnership Africa Canada (PAC), a nonprofit organization that implemented a gold formalization project in Orientale province of Congo in 2013 and 2014 with the Diamond Development Initiative, a group that has worked with artisanal diamond miners and their communities. Additionally, USAID and Banro Corporation have announced a public-private partnership, which is open to other corporate contributions, to help formalize legal, conflict-free artisanal mining in areas in and around industrial mining areas in ways that benefit both investors and local populations.

By supporting the formalization of the artisanal gold sector, retail companies have an opportunity to expand their access to conflict-free gold while encouraging responsible practices that benefit locals. Formalizing the artisanal gold sector, and moving the enormous wealth of Congo's artisanal gold through conflict-free supply chains would supply jewelry companies with responsibly sourced material while benefiting communities and enhancing the welfare of the people whose livelihoods depend on artisanal gold mining.

Conclusion

Violence has been raging in eastern Congo for almost two decades, fueled in part by the region's lucrative natural resources. Leadership among jewelry retailers can help break the link between gold and violence in Congo. Tiffany and Signet have demonstrated the powerful beneficial impact jewelers can have in improving the gold supply chain. But much more is needed. By building on the leadership and efforts of Tiffany and Signet, by collaborating with industry partners, adopting international standards and practices developed by other conflict-free initiatives, jewelers can help make gold a boon for the people of Congo and the Great Lakes region.

Endnotes

¹ World Gold Council, "Gold Demand Trends, Third Quarter 2014," p. 19, November, 2014, available at <http://www.gold.org/supply-and-demand/gold-demand-trends>.

² See Fidel Bafilemba, Timo Mueller, and Sasha Lezhnev, "The Impact of Dodd-Frank and Conflict Minerals Reforms on Eastern Congo's War," (Washington: The Enough Project, June 2014), available at <http://enoughproject.org/reports/impact-dodd-frank-and-conflict-minerals-reforms-eastern-congo%E2%80%99s-war>; Steven Spittaels, Ken Matthysen, Yannick Weyns, Filip Hilgert and Anna Bulzomi, "Analysis of interactive map of artisanal mining areas in Eastern DR Congo: May 2014 update," (Antwerp: International Peace Information Service, May, 2014), p. 12, available at <http://ipisresearch.eu/download.php?id%3D452>.

³ See Fidel Bafilemba, Timo Mueller, and Sasha Lezhnev, "The Impact of Dodd-Frank and Conflict Minerals Reforms on Eastern Congo's War," (Washington: The Enough Project, June 2014), available at <http://enoughproject.org/reports/impact-dodd-frank-and-conflict-minerals-reforms-eastern-congo%E2%80%99s-war>; Steven Spittaels, Ken Matthysen, Yannick Weyns, Filip Hilgert and Anna Bulzomi, "Analysis of interactive map of artisanal mining areas in Eastern DR Congo: May 2014 update," (Antwerp: International Peace Information Service, May, 2014), p. 12, available at <http://ipisresearch.eu/download.php?id%3D452>.

⁴ Artisanally mined gold is gold mined informally using low technology or with minimal machinery.

⁵ U.N. Security Council, "Final report of the Group of Experts on the Democratic Republic of the Congo," S/2014/42, para. 171, January 23, 2014, available at <http://www.un.org/sc/committees/1533/egroup.shtml>.

⁶ Gold mine production in the DRC in 2013 was 25.3 tonnes. Global gold mine production in 2013 was 3022.1 tonnes. Thus in 2013 the DRC accounted for .837% of global gold mine production. See Thomson Reuters, "[Gold Fields Mineral Services] GFMS Gold Survey 2014," (London: April 2014), pp. 36-37, available at <https://forms.thomsonreuters.com/gfms/>.

⁷ World Gold Council, "Supply and Demand, Jewellery," available at <http://www.gold.org/supply-and-demand/demand/jewellery> (last accessed November 2014).

⁸ The 14 companies are: Signet Jewelers, 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.nationaljeweler.com/galleries/products/100-Million-Superse-1443.shtml#16>. 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.

⁹ The full name is the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

¹⁰ Electronics Industry Citizenship Coalition and Global e-Sustainability Initiative, “Conflict-Free Smelter Program Compliant Gold Refiner List,” last updated July 2012, available at: http://www.unimetal.com/pdf/Ohio_CFS_Compliant_Gold_Refiners.pdf (last accessed November 2014).

¹¹ See Electronics Industry Citizenship Coalition and Global e-Sustainability Initiative, “Conflict-Free Smelter Program Indicators,” available at <http://www.conflictreesourcing.org/program-indicators/> (last updated November 17, 2014; last accessed November 2014).

¹² See U.N. Security Council, “Final report of the Group of Experts on the Democratic Republic of the Congo,” S/2014/42.

¹³ Spittaels, Matthysen, Weyns, Hilgert and Bulzomi, “Analysis of interactive map of artisanal mining areas in Eastern DR Congo,” p. 12.

¹⁴ U.N. Security Council, “Interim report of the Group of Experts on the DRC,” S/2010/252, para. 77, May 24, 2010, available at http://www.un.org/ga/search/view_doc.asp?symbol=S/2010/252.

¹⁵ Bafilemba, Mueller, and Lezhnev, “The Impact of Dodd-Frank and Conflict Minerals Reforms on Eastern Congo’s War.”

¹⁶ 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.

¹⁷ For more background information, see The Enough Project, “From Child Miner to Jewelry Store: The Six Steps of Congo’s Conflict Gold,” (Washington: October 2012), available at <http://www.enoughproject.org/files/Conflict-Gold.pdf>.

¹⁸ Spittaels, Matthysen, Weyns, Hilgert and Bulzomi, “Analysis of interactive map of artisanal mining areas in Eastern DR Congo,” p. 12 and Enough Project interview with regional gold industry expert, Kinshasa, November 2, 2014.

¹⁹ Gold mine production in the DRC in 2013 was 25.3 tonnes. Global gold mine production in 2013 was 3022.1 tonnes. Thus in 2013 the DRC accounted for .837% of global gold mine production. See Thomson Reuters, “[Gold Fields Mineral Services] GFMS Gold Survey 2014,” (London: April 2014), pp. 36-37, available at <https://forms.thomsonreuters.com/gfms/>.

²⁰ National Jeweler, “Top 50 North American Jewelry Retail Chains,” <http://www.nationaljeweler.com/galleries/products/Top-50-North-America-1335.shtml> (last accessed November 2014).

²¹ Signet Jewelers, “Signet Responsible Sourcing Protocol for Conflict-free gold,” revised September 2013, available at http://www.signetjewelers.com/files/doc_downloads/Signet-Responsible-Sourcing-Protocol-for-Gold-revised-September-2013.pdf (last accessed November 2014).

²² Andy Verity, “Gold market breaches covered up,” BBC News, February 25, 2014, available at <http://www.bbc.com/news/business-26341072>.

²³ The U.N. Security Council due diligence guidance provides another important framework. These guidelines, entitled, “Due diligence guidelines for the responsible supply chain of minerals from red flag locations to mitigate the risk of providing direct or indirect support for conflict in the eastern part of the Democratic Republic of the Congo,” are available at http://www.un.org/sc/committees/1533/pdf/due_diligence_guidelines.pdf (last accessed November 2014).

²⁴ Solutions Network, “Conflict Free Tin Initiative,” available at <http://solutions-network.org/site-cfti/> (last accessed November 2014).

²⁵ U.N. Security Council, “Final report of the Group of Experts on the Democratic Republic of the Congo,” S/2014/42, para. 171; U.N. Security Council, “Midterm report of the Group of Experts on the Democratic Republic of the Congo,” S/2013/433, July 19, 2013, available at <http://www.un.org/sc/committees/1533/egroup.shtml>; and Spittaels, Matthysen, Weyns, Hilgert and Bulzomi, “Analysis of interactive map of artisanal mining areas in Eastern DR Congo,” p. 12.



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Annex

Company	Points	Percentage
Signet Jewelers Limited	25	43.9%
Tiffany & Co.	22	38.6%
J.C. Penney Company, Inc.	12	21.1%
Target Corp	11.5	20.2%
Cartier	11	19.3%
QVC, Inc.	8	14.0%
Macy's Inc.	7.75	13.6%
Helzberg Diamonds	6	10.5%
Wal-Mart Stores, Inc.	5	8.8%
Sears Holdings Limited	5	8.8%
Costco Wholesale Corp	4	7.0%
Jewelry Television	0	0.0%
Neiman Marcus Group	0	0.0%
Ross-Simons	0	0.0%

	Possible Pts	Scoring Guide
Section 1: Company Policy	7 Total	
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 point for making the policy publicly available; an additional 1 point for making the policy easily accessible	The policy must explicitly mention conflict, conflict minerals, or require company adherence to industry association standards that explicitly mention conflict or conflict minerals. "Easily accessible" is defined as posted to the company's website or the Securities and Exchange Commission (SEC) website.
b) Has the company demonstrably 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 (OECD Guidelines)?	2 points	Full credit (2 points) is given to companies that have made a forward-looking commitment. Half credit (1 point) is given to companies that 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 to all employees and consultants, including to subsidiaries, involved directly or indirectly in the sourcing and sales of products that contain gold?	1 point	The dissemination must have been more direct than posting to a website, and a brief description on the nature of the dissemination must be provided to the Enough Project.
d) Has the company provided interactive employee training on the policy?	1 point	Training for a relevant subset of employees such as a working group qualifies for credit. A brief description of the nature of the training must be provided to the Enough Project.
e) Does the company have a specific conflict gold policy grievance mechanism by which employees, suppliers, or the public can anonymously and/or confidentially report possible violations of the policy?	1 point	To receive full credit for this question, the grievance mechanism must be specific to the conflict gold policy, or there must be a channel within a wider grievance mechanism for conflict gold policy violation reports. A brief description of the process in relation to conflict gold must be provided to the Enough Project.
Section 2: Engagement with Suppliers	13 Total	
a) Has the company disseminated its conflict gold policy to its suppliers (at minimum, 1st-tier suppliers)?	1 point	The policy must have been communicated directly to suppliers. Only posting to a website does not qualify. A brief description of the form of the communication must be provided to the Enough Project.
b) Has the company provided or directly supported interactive trainings for one or more of its suppliers on responsible, conflict-free gold sourcing and due diligence aligned with the OECD Guidelines?	2 points	Trainings must be provided by the company or a relevant industry association and must be on the specific topic of responsible minerals sourcing aligned with the OECD Guidelines. The company must have implemented at least one training or supported an industry association training directly financially or in-kind that meets the aforementioned content requirements. Financial contributions to an industry association without a specific link to supplier trainings will not qualify. A brief description of the training and the company's role in delivering or supporting the training must be provided to the Enough Project.
c) Has the company publicly committed to source only from audited conflict-free refiners, that is, refiners certified by the Conflict-Free Smelter Program or another OECD-compliant audit program consistent with the CFSP?	3 points	The commitment must be public, and it must require suppliers to source from only refiners certified by the CFSP or another OECD-compliant audit program consistent with the CFSP. Points are not given solely for inquiries as to whether or not suppliers or smelters are certified.
d) Has the company made public the number of known refiners in its supply chain?	1.5 points	The public source containing the number must be made available to the Enough Project. No credit is given to companies that only publish the number of known suppliers, but publishing the number of known suppliers and refiners together is sufficient for credit.
e) Has the company made public the names of known refiners in its supply chain?	1.5 points	The public source containing the names must be made available to the Enough Project. If the list contains the names of known refiners and suppliers, the refiners must be designated as such to receive credit.
f) Has the company held a meeting or meetings with its supplier or suppliers to develop strategies for sourcing conflict-free gold from the Great Lakes region of Africa or Congo (at minimum, at least one meeting with at least one supplier)?	4 points: 1 for Great Lakes region, 3 for Congo	The meeting or meetings must specifically include discussion of sourcing conflict-free gold from the Great Lakes region of Africa or Congo. The Great Lakes region of Africa refers to Congo or any of the nine adjoining countries. A brief description of the discussion must be provided to the Enough Project.
Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region	7 Total	
a) Is the company a member of the Public Private Alliance for Responsible Minerals Trade (PPA)?	3 points	The PPA must be able to verify membership.
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 point for 1 forum, 2 points for multiple forums	Companies must be able to provide verification of attendance upon request.
c) Is the company a member of the Responsible Jewellery Council (RJC) or the Initiative for Responsible Mining Assurance (IRMA)?	1 point	RJC or IRMA must be able to verify membership.
d) Does the company participate in the monthly multi-stakeholder group (MSG) calls organized by the Responsible Sourcing Network (RSN)?	1 point: 1/2 point for participation 1-2 times; an additional 1/2 point for participation more than 2 times	The RSN must be able to verify participation.
Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region	30 Total	
a) Is the company actively encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo, for example, the Solutions for Hope Gold process, organized by Resolve, or an analogous initiative?	9 points: 2 points for making a public statement; 2 points for making an open call; 2 points for attending a past meeting; 3 points for attending a meeting after September 15, 2014 and before the publication of the Leaderboard	Companies will get credit for "encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo" if they do or have done one or several of the following: make a public statement (written or verbal) encouraging the development of conflict-free gold sourcing initiatives; make a public open call to other companies, suppliers, and non-governmental organizations to encourage the development of conflict-free gold sourcing initiatives in Congo; attend a multi-stakeholder meeting (past or future) specifically toward the development of conflict-free gold sourcing initiatives in Congo (e.g. an OECD forum session specifically on this topic, Solutions for Hope Gold meeting). A verifiable description of the action taken must be provided to the Enough Project.
b) Is the company sourcing verifiably conflict-free gold from the Great Lakes region of Africa (the Democratic Republic of the Congo or of the nine adjoining countries)?	6 points: 4 points for sourcing from the Great Lakes region, 2 additional points for sourcing specifically from Congo	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.
c) Is the company sourcing verifiably conflict-free gold specifically from the Kivu provinces of Congo?	11 points	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.
d) Does the company or company foundation support sustainable, 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	Companies must provide an overview of the project(s), as well as lists of the major stakeholders and beneficiaries, the implementing organization(s), geographic location and scope, project timeline, and amount contributed. The project(s) must adhere to or not be in contradiction to the following standards: OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Appendix: Suggested measures to create economic and development opportunities for artisanal and small-scale miners; Voluntary Principles for Security and Human Rights; Equator Principles; UN Principles for Responsible Investment; and recommendations in "Doing Good, while Doing Well: Is there a Win-Win Formula for Responsibly Investing in Congo's Minerals Sector?" Enough Project, July 2014.
TOTAL	57	

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
Section 1: Company Policy	7 Total							
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 point for making the policy publicly available; an additional 1 point for making the policy easily accessible	The policy must explicitly mention conflict, conflict minerals, or require company adherence to industry association standards that explicitly mention conflict or conflict minerals. "Easily accessible" is defined as posted to the company's website or the Securities and Exchange Commission (SEC) website.	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." We believe in and will respect the fundamental human rights and the dignity of the individual, according to the United Nations Declaration of Human Rights. We will not tolerate the use of child labour. We will not use any forced, bonded, indentured or prison labour, nor restrict the freedom of movement of employees and dependents. Cartier's suppliers are subject to audits by an independent third party that conducts a complete assessment of social and regulatory compliance issues, including forced labor."	Did not file	Richemont (parent company) states: "The responsible procurement of industry-specific raw materials such as gold and diamonds is a priority for the Group. Historically, for the luxury goods industry as a whole, there have been issues surrounding the sourcing of gold and diamonds, as these are often mined in regions affected by conflict or instability. Therefore, our long-term goal is the traceability of all raw materials used in our products. We understand many of the challenges associated with achieving full traceability and will work closely with our suppliers and industry partners towards that goal. Our Model Supplier Code of Conduct sets out our position on the following issues...As far as possible, Richemont requests its suppliers to provide assurance that the gold being supplied has been mined in a way which respects human and labour rights and the environment. We continue to work with suppliers and refiners in this respect to seek to improve controls over the supply chain, where possible. We continue to work closely with the Responsible Jewellery Council ('RJC') to help improve the gold supply chain. In addition to this industry-wide approach, we work with our gold suppliers to strengthen the inclusion of ethical criteria at all levels of our gold sourcing supply chain. Membership of the RJC promotes a robust approach to these supply chain issues for our Maisons and other businesses in the jewellery industry, from mines to retail."	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
b) Has the company demonstrably 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 (OECD Guidelines)?	2 points	Full credit (2 points) is given to companies that have made a forward-looking commitment. Half credit (1 point) is given to companies that have used, implemented, or complied with such guidelines, but have not publicly committed to doing so in the future.	1	"Cartier's policy requires adherence to the OECD due diligence guidance for conflict areas."	No information available	Did not file	No information available	Half credit is awarded because, while the company used such guidelines in designing its supply chain policies and procedures, there is no statement of intention for committing to implementing them in the future.
c) Has the company disseminated its policy on conflict gold to all employees and consultants, including to subsidiaries, involved directly or indirectly in the sourcing and sales of products that contain gold?	1 point	The dissemination must have been more direct than posting to a website, and a brief description on the nature of the dissemination must be provided to the Enough Project.	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	No information available	N/A
d) Has the company provided interactive employee training on the policy?	1 point	Training for a relevant subset of employees such as a working group qualifies for credit. A brief description of the nature of the training must be provided to the Enough Project.	1	"Cartier built the policy with its employees in a consultative process that is the norm for Cartier. This is a process of more than a year. The CR team at Cartier train and have an open dialogue with their buyers and account managers and have built management tools to aid their staff implement the policy. This is a continuous process."	No information available	Did not file	No information available	N/A
e) Does the company have a specific conflict gold policy grievance mechanism by which employees, suppliers, or the public can anonymously and/or confidentially report possible violations of the policy?	1 point	To receive full credit for this question, the grievance mechanism must be specific to the conflict gold policy, or there must be a channel within a wider grievance mechanism for conflict gold policy violation reports. A brief description of the process in relation to conflict gold must be provided to the Enough Project.	0	"Cartier has a grievance... mechanism and a whistle blowing hotline that is specifically identified in their supplier code of conduct and CSR and HR policies. All these policies include conflict minerals specifically. The grievance mechanism therefore clearly covers conflict minerals. It would not be appropriate to have separate grievance mechanisms for each issue that has to be covered in Cartier's policies."	No information available	Did not file	No information available	Response does not clarify how the grievance mechanism is specific to conflict minerals.
Section 2: Engagement with Suppliers	13 Total							

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
a) Has the company disseminated its conflict gold policy to its suppliers (at minimum, 1st-tier suppliers)?	1 point	The policy must have been communicated directly to suppliers. Only posting to a website does not qualify. A brief description of the form of the communication must be provided to the Enough Project.	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 supplies 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	No information available	N/A
b) Has the company provided or directly supported interactive trainings for one or more of its suppliers on responsible, conflict-free gold sourcing and due diligence aligned with the OECD Guidelines?	2 points	Trainings must be provided by the company or a relevant industry association and must be on the specific topic of responsible minerals sourcing aligned with the OECD Guidelines. The company must have implemented at least one training or supported an industry association training directly financially or in-kind that meets the aforementioned content requirements. Financial contributions to an industry association without a specific link to supplier trainings will not qualify. A brief description of the training and the company's role in delivering or supporting the training must be provided to the Enough Project.	2	"Cartier has provided specific training and continues to train and dialogue on conflict minerals with its main gold supplier and all its other smaller gold suppliers. This communication has been in place for at least two years and continues. This includes the OECD guidelines as well as other instruments and guidelines pertinent to this issue."	No information available	Did not file	No information available	N/A
c) Has the company publicly committed to source only from audited conflict-free refiners, that is, refiners certified by the Conflict-Free Smelter Program or another OECD-compliant audit program consistent with the CFSP?	3 points	The commitment must be public, and it must require suppliers to source from only refiners certified by the CFSP or another OECD-compliant audit program consistent with the CFSP. Points are not given solely for inquiries as to whether or not suppliers or smelters are certified.	0	"Cartier's policy is clear. All sources of gold, from refiners or elsewhere, must come from suppliers that can demonstrate adherence to the OECD and meet international best practices, such as the RJC (that includes a requirement for conformance with the OECD). This would also include the CFSP."	No information available	Did not file	No information available	No credit. "Demonstrated adherence" without an independent certification by an OECD-compliant program is insufficient for credit. Commitment must be to source only from refiners that are certified by one or more such programs.
d) Has the company made public the number of known refiners in its supply chain?	1.5 points	The public source containing the number must be made available to the Enough Project. No credit is given to companies that only publish the number of known suppliers, but publishing the number of known suppliers and refiners together is sufficient for credit.	0	"Cartier does not provide any information about its business partners and refiners, other than what is normally required by law. This would not be appropriate. Cartier's refiners however are well known in the industry and all their information is publicly available and where applicable in Cartier's publicly reported information, accounts and filings."	No information available	Did not file	No information available	A public number of refiners is required for credit.

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
e) Has the company made public the names of known refiners in its supply chain?	1.5 points	The public source containing the names must be made available to the Enough Project. If the list contains the names of known refiners and suppliers, the refiners must be designated as such to receive credit.	0	"Cartier does not provide any information about its business partners and refiners, other than what is normally required by law. This would not be appropriate. Cartier's refiners however are well known in the industry and all their information is publicly available and where applicable in Cartier's publicly reported information, accounts and filings."	No information available	Did not file	No information available	A public list of named refiners is required for credit.
f) Has the company held a meeting or meetings with its supplier or suppliers to develop strategies for sourcing conflict-free gold from the Great Lakes region of Africa or Congo (at minimum, at least one meeting with at least one supplier)?	4 points: 1 for Great Lakes region, 3 for Congo	The meeting or meetings must specifically include discussion of sourcing conflict-free gold from the Great Lakes region of Africa or Congo. The Great Lakes region of Africa refers to Congo or any of the nine adjoining countries. A brief description of the discussion must be provided to the Enough Project.	0	"Yes, Cartier has held conferences with its major refiner and its secondary refiners to discuss the options for conflict free sourcing, including from Congo and GLR."	No information available	Did not file	No information available	No credit. "Discuss options" is not the same as "develop strategies" and an adequate description of the meetings was not provided.
Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region	7 Total							
a) Is the company a member of the Public Private Alliance for Responsible Minerals Trade (PPA)?	3 points	The PPA must be able to verify membership.	0	No information given	No information available	Did not file	Is not a member of the PPA, as verified by the PPA	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 point for 1 forum, 2 points for multiple forums	Companies must be able to provide verification of attendance upon request.	2	No information given	No information available	Did not file	Attended multiple forums, according to observation by Enough Project staff at forums.	N/A
c) Is the company a member of the Responsible Jewellery Council (RJC) or the Initiative for Responsible Mining Assurance (IRMA)?	1 point	RJC or IRMA must be able to verify membership.	1	No information given	No information available	Did not file	Listed as member of RJC on website.	N/A
d) Does the company participate in the monthly multi-stakeholder group (MSG) calls organized by the Responsible Sourcing Network (RSN)?	1 point: 1/2 point for participation 1-2 times; an additional 1/2 point for participation more than 2 times	The RSN must be able to verify participation.	0	No information given	No information available	Did not file	Does not participate in MSG calls, as verified by the Responsible Sourcing Network (call host)	N/A
Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region	30 Total							

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
a) Is the company actively encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo, for example, the Solutions for Hope Gold process, organized by Resolve, or an analogous initiative?	9 points: 2 points for making a public statement; 2 points for making an open call; 2 points for attending a past meeting; 3 points for attending a meeting after September 15, 2014 and before the publication of the Leaderboard	Companies will get credit for "encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo" if they do or have done one or several of the following: make a public statement (written or verbal) encouraging the development of conflict-free gold sourcing initiatives; make a public open call to other companies, suppliers, and non-governmental organizations to encourage the development of conflict-free gold sourcing initiatives in Congo; attend a multi-stakeholder meeting (past or future) specifically toward the development of conflict-free gold sourcing initiatives in Congo (e.g. an OECD forum session specifically on this topic, Solutions for Hope Gold meeting). A verifiable description of the action taken must be provided to the Enough Project.	0	"Cartier is supporting through its supply chain and through its foundations activities globally, including in Africa in so-called conflict countries adjoining the DRC, to develop sources of gold from small scale miners that are free from conflict, don't support conflict, enable empowered communities and inclusive economies."	No information available	Did not file	No information available	Company response not sufficiently detailed or specific to the question to receive credit.
b) Is the company sourcing verifiably conflict-free gold from the Great Lakes region of Africa (the Democratic Republic of the Congo or of the nine adjoining countries)?	6 points: 4 points for sourcing from the Great Lakes region, 2 additional points for sourcing specifically from Congo	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	0	No information given	No information available	Did not file	No information available	N/A
c) Is the company sourcing verifiably conflict-free gold specifically from the Kivu provinces of Congo?	11 points	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	0	No information given	No information available	Did not file	No information available	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
d) Does the company or company foundation support sustainable, 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	Companies must provide an overview of the project(s), as well as lists of the major stakeholders and beneficiaries, the implementing organization(s), geographic location and scope, project timeline, and amount contributed. The project(s) must adhere to or not be in contradiction to the following standards: OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Appendix: Suggested measures to create economic and development opportunities for artisanal and small-scale miners; Voluntary Principles for Security and Human Rights; Equator Principles; UN Principles for Responsible Investment; and recommendations in "Doing Good, while Doing Well: Is there a Win-Win Formula for Responsibly Investing in Congo's Minerals Sector?" Enough Project, July 2014.	0	"Cartier is supporting through its supply chain and through its foundations activities globally, including in Africa in so-called conflict countries adjoining the DRC, to develop sources of gold from small scale miners that are free from conflict, don't support conflict, enable empowered communities and inclusive economies."	No information available	Did not file	No information available	Company foundation activities do not relate to conflict-free gold sourcing from Congo, and details provided in the company response is not sufficiently detailed, so no credit was given here.
TOTAL	57		11					

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
Section 1: Company Policy	7 Total							
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 point for making the policy publicly available; an additional 1 point for making the policy easily accessible	The policy must explicitly mention conflict, conflict minerals, or require company adherence to industry association standards that explicitly mention conflict or conflict minerals. "Easily accessible" is defined as posted to the company's website or the Securities and Exchange Commission (SEC) website.	1	No information given	No information available	No information available	The following policy is posted on a 3rd party website: "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. "	The policy is not posted on the company website or the SEC website, but on a third party website. A search for "conflict minerals" or "conflict minerals policy" on the Costco website does not yield any results.
b) Has the company demonstrably 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 (OECD Guidelines)?	2 points	Full credit (2 points) is given to companies that have made a forward-looking commitment. Half credit (1 point) is given to companies that have used, implemented, or complied with such guidelines, but have not publicly committed to doing so in the future.	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."	No information available	N/A
c) Has the company disseminated its policy on conflict gold to all employees and consultants, including to subsidiaries, involved directly or indirectly in the sourcing and sales of products that contain gold?	1 point	The dissemination must have been more direct than posting to a website, and a brief description on the nature of the dissemination must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A
d) Has the company provided interactive employee training on the policy?	1 point	Training for a relevant subset of employees such as a working group qualifies for credit. A brief description of the nature of the training must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
e) Does the company have a specific conflict gold policy grievance mechanism by which employees, suppliers, or the public can anonymously and/or confidentially report possible violations of the policy?	1 point	To receive full credit for this question, the grievance mechanism must be specific to the conflict gold policy, or there must be a channel within a wider grievance mechanism for conflict gold policy violation reports. A brief description of the process in relation to conflict gold must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	Costco has a "Confidential Ethics Hotline," but it is a general hotline mechanism for reporting of any possible violations of policy. There does not appear to be a specific conflict gold or minerals channel within this wider mechanism.
Section 2: Engagement with Suppliers	13 Total							
a) Has the company disseminated its conflict gold policy to its suppliers (at minimum, 1st-tier suppliers)?	1 point	The policy must have been communicated directly to suppliers. Only posting to a website does not qualify. A brief description of the form of the communication must be provided to the Enough Project.	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."	No information available	N/A
b) Has the company provided or directly supported interactive trainings for one or more of its suppliers on responsible, conflict-free gold sourcing and due diligence aligned with the OECD Guidelines?	2 points	Trainings must be provided by the company or a relevant industry association and must be on the specific topic of responsible minerals sourcing aligned with the OECD Guidelines. The company must have implemented at least one training or supported an industry association training directly financially or in-kind that meets the aforementioned content requirements. Financial contributions to an industry association without a specific link to supplier trainings will not qualify. A brief description of the training and the company's role in delivering or supporting the training must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
c) Has the company publicly committed to source only from audited conflict-free refiners, that is, refiners certified by the Conflict-Free Smelter Program or another OECD-compliant audit program consistent with the CFSP?	3 points	The commitment must be public, and it must require suppliers to source from only refiners certified by the CFSP or another OECD-compliant audit program consistent with the CFSP. Points are not given solely for inquiries as to whether or not suppliers or smelters are certified.	0	No information given	No information available	No information available	The following policy is posted on a 3rd party website: "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. "	The company asks (i.e. requests) for the suppliers to follow these steps rather than commit to (i.e. require suppliers) only source from one of the certification programs listed.
d) Has the company made public the number of known refiners in its supply chain?	1.5 points	The public source containing the number must be made available to the Enough Project. No credit is given to companies that only publish the number of known suppliers, but publishing the number of known suppliers and refiners together is sufficient for credit.	0	No information given	No information available	No information available	No information available	N/A
e) Has the company made public the names of known refiners in its supply chain?	1.5 points	The public source containing the names must be made available to the Enough Project. If the list contains the names of known refiners and suppliers, the refiners must be designated as such to receive credit.	0	No information given	No information available	No information available	No information available	N/A
f) Has the company held a meeting or meetings with its supplier or suppliers to develop strategies for sourcing conflict-free gold from the Great Lakes region of Africa or Congo (at minimum, at least one meeting with at least one supplier)?	4 points: 1 for Great Lakes region, 3 for Congo	The meeting or meetings must specifically include discussion of sourcing conflict-free gold from the Great Lakes region of Africa or Congo. The Great Lakes region of Africa refers to Congo or any of the nine adjoining countries. A brief description of the discussion must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A
Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region	7 Total							
a) Is the company a member of the Public Private Alliance for Responsible Minerals Trade (PPA)?	3 points	The PPA must be able to verify membership.	0	No information given	No information available	No information available	Is not a member of the PPA, as verified by the PPA	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 point for 1 forum, 2 points for multiple forums	Companies must be able to provide verification of attendance upon request.	0	No information given	No information available	No information available	No information available	N/A
c) Is the company a member of the Responsible Jewellery Council (RJC) or the Initiative for Responsible Mining Assurance (IRMA)?	1 point	RJC or IRMA must be able to verify membership.	0	No information given	No information available	No information available	No information available	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
d) Does the company participate in the monthly multi-stakeholder group (MSG) calls organized by the Responsible Sourcing Network (RSN)?	1 point: 1/2 point for participation 1-2 times; an additional 1/2 point for participation more than 2 times	The RSN must be able to verify participation.	0	No information given	No information available	No information available	Does not participate in MSG calls, as verified by the Responsible Sourcing Network (call host)	N/A
Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region	30 Total							
a) Is the company actively encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo, for example, the Solutions for Hope Gold process, organized by Resolve, or an analogous initiative?	9 points: 2 points for making a public statement; 2 points for making an open call; 2 points for attending a past meeting; 3 points for attending a meeting after September 15, 2014 and before the publication of the Leaderboard	Companies will get credit for "encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo" if they do or have done one or several of the following: make a public statement (written or verbal) encouraging the development of conflict-free gold sourcing initiatives; make a public open call to other companies, suppliers, and non-governmental organizations to encourage the development of conflict-free gold sourcing initiatives in Congo; attend a multi-stakeholder meeting (past or future) specifically toward the development of conflict-free gold sourcing initiatives in Congo (e.g. an OECD forum session specifically on this topic, Solutions for Hope Gold meeting). A verifiable description of the action taken must be provided to the Enough Project.	0	No information given	No information available	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 of the nine adjoining countries)?	6 points: 4 points for sourcing from the Great Lakes region, 2 additional points for sourcing specifically from Congo	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	0	No information given	No information available	No information available	No information available	N/A
c) Is the company sourcing verifiably conflict-free gold specifically from the Kivu provinces of Congo?	11 points	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	0	No information given	No information available	No information available	No information available	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
d) Does the company or company foundation support sustainable, 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	Companies must provide an overview of the project(s), as well as lists of the major stakeholders and beneficiaries, the implementing organization(s), geographic location and scope, project timeline, and amount contributed. The project(s) must adhere to or not be in contradiction to the following standards: OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Appendix: Suggested measures to create economic and development opportunities for artisanal and small-scale miners; Voluntary Principles for Security and Human Rights; Equator Principles; UN Principles for Responsible Investment; and recommendations in "Doing Good, while Doing Well: Is there a Win-Win Formula for Responsibly Investing in Congo's Minerals Sector?" Enough Project, July 2014.	0	No information given	No information available	No information available	No information available	N/A
TOTAL	57		4					

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	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
Section 1: Company Policy	7 Total							
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 point for making the policy publicly available; an additional 1 point for making the policy easily accessible	The policy must explicitly mention conflict, conflict minerals, or require company adherence to industry association standards that explicitly mention conflict or conflict minerals. "Easily accessible" is defined as posted to the company's website or the Securities and Exchange Commission (SEC) website.	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. ... Helzberg Diamonds requires all parties involved in the mining, processing and manufacturing of the products Helzberg sells respect basic human rights (as outlined in international conventions and declarations such as the UN "Universal Declaration of Human Rights" and others). Helzberg Diamonds requires our suppliers agree not to source gold from areas of armed or militarized conflict where there is high risk for human rights violations."	No information available	No information available	N/A
b) Has the company demonstrably 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 (OECD Guidelines)?	2 points	Full credit (2 points) is given to companies that have made a forward-looking commitment. Half credit (1 point) is given to companies that have used, implemented, or complied with such guidelines, but have not publicly committed to doing so in the future.	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)	No information available	N/A
c) Has the company disseminated its policy on conflict gold to all employees and consultants, including to subsidiaries, involved directly or indirectly in the sourcing and sales of products that contain gold?	1 point	The dissemination must have been more direct than posting to a website, and a brief description on the nature of the dissemination must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A
d) Has the company provided interactive employee training on the policy?	1 point	Training for a relevant subset of employees such as a working group qualifies for credit. A brief description of the nature of the training must be provided to the Enough Project.	1	"[In approximately January 2013], we held one training for store associates on our policy and responsible sourcing. Trainings are in-person, held on a Saturday, last all day for relevant personnel, and include an interactive quiz. We will likely hold another training like this again before the end of [2014]."	No information available	No information available	No information available	N/A
e) Does the company have a specific conflict gold policy grievance mechanism by which employees, suppliers, or the public can anonymously and/or confidentially report possible violations of the policy?	1 point	To receive full credit for this question, the grievance mechanism must be specific to the conflict gold policy, or there must be a channel within a wider grievance mechanism for conflict gold policy violation reports. A brief description of the process in relation to conflict gold must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A
Section 2: Engagement with Suppliers	13 Total							

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	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
a) Has the company disseminated its conflict gold policy to its suppliers (at minimum, 1st-tier suppliers)?	1 point	The policy must have been communicated directly to suppliers. Only posting to a website does not qualify. A brief description of the form of the communication must be provided to the Enough Project.	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	No information available	N/A
b) Has the company provided or directly supported interactive trainings for one or more of its suppliers on responsible, conflict-free gold sourcing and due diligence aligned with the OECD Guidelines?	2 points	Trainings must be provided by the company or a relevant industry association and must be on the specific topic of responsible minerals sourcing aligned with the OECD Guidelines. The company must have implemented at least one training or supported an industry association training directly financially or in-kind that meets the aforementioned content requirements. Financial contributions to an industry association without a specific link to supplier trainings will not qualify. A brief description of the training and the company's role in delivering or supporting the training must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A
c) Has the company publicly committed to source only from audited conflict-free refiners, that is, refiners certified by the Conflict-Free Smelter Program or another OECD-compliant audit program consistent with the CFSP?	3 points	The commitment must be public, and it must require suppliers to source from only refiners certified by the CFSP or another OECD-compliant audit program consistent with the CFSP. Points are not given solely for inquiries as to whether or not suppliers or smelters are certified.	0	No information given	"Helberg Diamonds requires all parties involved in the mining, processing and manufacturing of the products Helberg sells respect basic human rights (as outlined in international conventions and declarations such as the UN "Universal Declaration of Human Rights" and others). Helberg Diamonds requires our suppliers agree not to source gold from areas of armed or militarized conflict where there is high risk for human rights violations."	No information available	No information available	No specific reference to OECD-compliant smelter certification programs. Commitment must be to source only from refiners that are certified by one or more such programs.
d) Has the company made public the number of known refiners in its supply chain?	1.5 points	The public source containing the number must be made available to the Enough Project. No credit is given to companies that only publish the number of known suppliers, but publishing the number of known suppliers and refiners together is sufficient for credit.	0	No information given	No information available	No information available	No information available	N/A
e) Has the company made public the names of known refiners in its supply chain?	1.5 points	The public source containing the names must be made available to the Enough Project. If the list contains the names of known refiners and suppliers, the refiners must be designated as such to receive credit.	0	No information given	No information available	No information available	No information available	N/A

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	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
f) Has the company held a meeting or meetings with its supplier or suppliers to develop strategies for sourcing conflict-free gold from the Great Lakes region of Africa or Congo (at minimum, at least one meeting with at least one supplier)?	4 points: 1 for Great Lakes region, 3 for Congo	The meeting or meetings must specifically include discussion of sourcing conflict-free gold from the Great Lakes region of Africa or Congo. The Great Lakes region of Africa refers to Congo or any of the nine adjoining countries. A brief description of the discussion must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A
Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region	7 Total							
a) Is the company a member of the Public Private Alliance for Responsible Minerals Trade (PPA)?	3 points	The PPA must be able to verify membership.	0	No information given	No information available	No information available	Is not a member of the PPA, as verified by the PPA	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 point for 1 forum, 2 points for multiple forums	Companies must be able to provide verification of attendance upon request.	0	No information given	No information available	No information available	No information available	N/A
c) Is the company a member of the Responsible Jewellery Council (RJC) or the Initiative for Responsible Mining Assurance (IRMA)?	1 point	RJC or IRMA must be able to verify membership.	0	No information given	No information available	No information available	No information available	N/A
d) Does the company participate in the monthly multi-stakeholder group (MSG) calls organized by the Responsible Sourcing Network (RSN)?	1 point: 1/2 point for participation 1-2 times; an additional 1/2 point for participation more than 2 times	The RSN must be able to verify participation.	0	No information given	No information available	No information available	Does not participate in MSG calls, as verified by the Responsible Sourcing Network (call host)	N/A
Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region	30 Total							

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	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
a) Is the company actively encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo, for example, the Solutions for Hope Gold process, organized by Resolve, or an analogous initiative?	9 points: 2 points for making a public statement; 2 points for making an open call; 2 points for attending a past meeting; 3 points for attending a meeting after September 15, 2014 and before the publication of the Leaderboard	Companies will get credit for "encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo" if they do or have done one or several of the following: make a public statement (written or verbal) encouraging the development of conflict-free gold sourcing initiatives; make a public open call to other companies, suppliers, and non-governmental organizations to encourage the development of conflict-free gold sourcing initiatives in Congo; attend a multi-stakeholder meeting (past or future) specifically toward the development of conflict-free gold sourcing initiatives in Congo (e.g. an OECD forum session specifically on this topic, Solutions for Hope Gold meeting). A verifiable description of the action taken must be provided to the Enough Project.	0	No information given	No information available	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 of the nine adjoining countries)?	6 points: 4 points for sourcing from the Great Lakes region, 2 additional points for sourcing specifically from Congo	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	0	No information given	No information available	No information available	No information available	N/A
c) Is the company sourcing verifiably conflict-free gold specifically from the Kivu provinces of Congo?	11 points	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	0	No information given	No information available	No information available	No information available	N/A

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	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
d) Does the company or company foundation support sustainable, 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	Companies must provide an overview of the project(s), as well as lists of the major stakeholders and beneficiaries, the implementing organization(s), geographic location and scope, project timeline, and amount contributed. The project(s) must adhere to or not be in contradiction to the following standards: OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Appendix: Suggested measures to create economic and development opportunities for artisanal and small-scale miners; Voluntary Principles for Security and Human Rights; Equator Principles; UN Principles for Responsible Investment; and recommendations in "Doing Good, while Doing Well: Is there a Win-Win Formula for Responsibly Investing in Congo's Minerals Sector?" Enough Project, July 2014.	0	No information given	No information available	No information available	No information available	N/A
TOTAL	57		6					

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
Section 1: Company Policy	7 Total							
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 point for making the policy publicly available; an additional 1 point for making the policy easily accessible	The policy must explicitly mention conflict, conflict minerals, or require company adherence to industry association standards that explicitly mention conflict or conflict minerals. "Easily accessible" is defined as posted to the company's website or the Securities and Exchange Commission (SEC) website.	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."	No information available	N/A
b) Has the company demonstrably 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 (OECD Guidelines)?	2 points	Full credit (2 points) is given to companies that have made a forward-looking commitment. Half credit (1 point) is given to companies that have used, implemented, or complied with such guidelines, but have not publicly committed to doing so in the future.	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."	No information available	N/A
c) Has the company disseminated its policy on conflict gold to all employees and consultants, including to subsidiaries, involved directly or indirectly in the sourcing and sales of products that contain gold?	1 point	The dissemination must have been more direct than posting to a website, and a brief description on the nature of the dissemination must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A
d) Has the company provided interactive employee training on the policy?	1 point	Training for a relevant subset of employees such as a working group qualifies for credit. A brief description of the nature of the training must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
e) Does the company have a specific conflict gold policy grievance mechanism by which employees, suppliers, or the public can anonymously and/or confidentially report possible violations of the policy?	1 point	To receive full credit for this question, the grievance mechanism must be specific to the conflict gold policy, or there must be a channel within a wider grievance mechanism for conflict gold policy violation reports. A brief description of the process in relation to conflict gold must be provided to the Enough Project.	1	No information given	"Questions regarding JCPenney's Conflict Minerals Policy and Compliance program can be addressed to conflictminerals-sm@jcp.com . Potential ethical or legal violations involving JCPenney business can be reported by accessing our hotline at www.jcpjline.com ."	"JCPenney's Conflict Minerals Policy is publicly available on our website at http://ir.jcpenny.com under Corporate Social Responsibility and includes information regarding how questions can be addressed and violations may be reported."	No information available	N/A
Section 2: Engagement with Suppliers	13 Total							
a) Has the company disseminated its conflict gold policy to its suppliers (at minimum, 1st-tier suppliers)?	1 point	The policy must have been communicated directly to suppliers. Only posting to a website does not qualify. A brief description of the form of the communication must be provided to the Enough Project.	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."	No information available	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
b) Has the company provided or directly supported interactive trainings for one or more of its suppliers on responsible, conflict-free gold sourcing and due diligence aligned with the OECD Guidelines?	2 points	Trainings must be provided by the company or a relevant industry association and must be on the specific topic of responsible minerals sourcing aligned with the OECD Guidelines. The company must have implemented at least one training or supported an industry association training directly financially or in-kind that meets the aforementioned content requirements. Financial contributions to an industry association without a specific link to supplier trainings will not qualify. A brief description of the training and the company's role in delivering or supporting the training must be provided to the Enough Project.	2	No information given	"JCPenney has partnered with other retailers to develop supplier education and training materials to increase awareness of this important issue and enhance supply chain transparency."	"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."	No information available	The RILA training program is partially based on due diligence guidelines and mentions the OECD.
c) Has the company publicly committed to source only from audited conflict-free refiners, that is, refiners certified by the Conflict-Free Smelter Program or another OECD-compliant audit program consistent with the CFSP?	3 points	The commitment must be public, and it must require suppliers to source from only refiners certified by the CFSP or another OECD-compliant audit program consistent with the CFSP. Points are not given solely for inquiries as to whether or not suppliers or smelters are certified.	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	No information available	N/A
d) Has the company made public the number of known refiners in its supply chain?	1.5 points	The public source containing the number must be made available to the Enough Project. No credit is given to companies that only publish the number of known suppliers, but publishing the number of known suppliers and refiners together is sufficient for credit.	0	No information given	No information available	No information available	No information available	N/A
e) Has the company made public the names of known refiners in its supply chain?	1.5 points	The public source containing the names must be made available to the Enough Project. If the list contains the names of known refiners and suppliers, the refiners must be designated as such to receive credit.	0	No information given	No information available	No information available	No information available	N/A
f) Has the company held a meeting or meetings with its supplier or suppliers to develop strategies for sourcing conflict-free gold from the Great Lakes region of Africa or Congo (at minimum, at least one meeting with at least one supplier)?	4 points: 1 for Great Lakes region, 3 for Congo	The meeting or meetings must specifically include discussion of sourcing conflict-free gold from the Great Lakes region of Africa or Congo. The Great Lakes region of Africa refers to Congo or any of the nine adjoining countries. A brief description of the discussion must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A
Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region	7 Total							

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
a) Is the company a member of the Public Private Alliance for Responsible Minerals Trade (PPA)?	3 points	The PPA must be able to verify membership.	0	No information given	No information available	No information available	Is not a member of the PPA, as verified by the PPA	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 point for 1 forum, 2 points for multiple forums	Companies must be able to provide verification of attendance upon request.	0	No information given	No information available	No information available	No information available	N/A
c) Is the company a member of the Responsible Jewellery Council (RJC) or the Initiative for Responsible Mining Assurance (IRMA)?	1 point	RJC or IRMA must be able to verify membership.	1	"In 2007 we joined the Responsible Jewellery Council ('RJC') and are committed to promoting responsible, ethical, transparent social and environmental practices..."	No information available	No information available	Listed as member of RJC	N/A
d) Does the company participate in the monthly multi-stakeholder group (MSG) calls organized by the Responsible Sourcing Network (RSN)?	1 point: 1/2 point for participation 1-2 times; an additional 1/2 point for participation more than 2 times	The RSN must be able to verify participation.	0	No information given	No information available	No information available	Does not participate in MSG calls, as verified by Responsible Sourcing Network (call host)	N/A
Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region	30 Total							
a) Is the company actively encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo, for example, the Solutions for Hope Gold process, organized by Resolve, or an analogous initiative?	9 points: 2 points for making a public statement; 2 points for making an open call; 2 points for attending a past meeting; 3 points for attending a meeting after September 15, 2014 and before the publication of the Leaderboard	Companies will get credit for "encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo" if they do or have done one or several of the following: make a public statement (written or verbal) encouraging the development of conflict-free gold sourcing initiatives; make a public open call to other companies, suppliers, and non-governmental organizations to encourage the development of conflict-free gold sourcing initiatives in Congo; attend a multi-stakeholder meeting (past or future) specifically toward the development of conflict-free gold sourcing initiatives in Congo (e.g. an OECD forum session specifically on this topic, Solutions for Hope Gold meeting). A verifiable description of the action taken must be provided to the Enough Project.	0	No information given	No information available	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 of the nine adjoining countries)?	6 points: 4 points for sourcing from the Great Lakes region, 2 additional points for sourcing specifically from Congo	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	0	No information given	No information available	No information available	No information available	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
c) Is the company sourcing verifiably conflict-free gold specifically from the Kivu provinces of Congo?	11 points	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	0	No information given	No information available	No information available	No information available	N/A
d) Does the company or company foundation support sustainable, 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	Companies must provide an overview of the project(s), as well as lists of the major stakeholders and beneficiaries, the implementing organization(s), geographic location and scope, project timeline, and amount contributed. The project(s) must adhere to or not be in contradiction to the following standards: OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Appendix: Suggested measures to create economic and development opportunities for artisanal and small-scale miners; Voluntary Principles for Security and Human Rights; Equator Principles; UN Principles for Responsible Investment; and recommendations in "Doing Good, while Doing Well: Is there a Win-Win Formula for Responsibly Investing in Congo's Minerals Sector?" Enough Project, July 2014.	0	No information given	No information available	No information available	No information available	N/A
TOTAL	57		12					

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	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
Section 1: Company Policy	7 Total							
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 point for making the policy publicly available; an additional 1 point for making the policy easily accessible	The policy must explicitly mention conflict, conflict minerals, or require company adherence to industry association standards that explicitly mention conflict or conflict minerals. "Easily accessible" is defined as posted to the company's website or the Securities and Exchange Commission (SEC) website.	0	No information given	No information available	Did not file	No information available	N/A
b) Has the company demonstrably 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 (OECD Guidelines)?	2 points	Full credit (2 points) is given to companies that have made a forward-looking commitment. Half credit (1 point) is given to companies that have used, implemented, or complied with such guidelines, but have not publicly committed to doing so in the future.	0	No information given	No information available	Did not file	No information available	N/A
c) Has the company disseminated its policy on conflict gold to all employees and consultants, including to subsidiaries, involved directly or indirectly in the sourcing and sales of products that contain gold?	1 point	The dissemination must have been more direct than posting to a website, and a brief description on the nature of the dissemination must be provided to the Enough Project.	0	No information given	No information available	Did not file	No information available	N/A
d) Has the company provided interactive employee training on the policy?	1 point	Training for a relevant subset of employees such as a working group qualifies for credit. A brief description of the nature of the training must be provided to the Enough Project.	0	No information given	No information available	Did not file	No information available	N/A
e) Does the company have a specific conflict gold policy grievance mechanism by which employees, suppliers, or the public can anonymously and/or confidentially report possible violations of the policy?	1 point	To receive full credit for this question, the grievance mechanism must be specific to the conflict gold policy, or there must be a channel within a wider grievance mechanism for conflict gold policy violation reports. A brief description of the process in relation to conflict gold must be provided to the Enough Project.	0	No information given	No information available	Did not file	No information available	N/A
Section 2: Engagement with Suppliers	13 Total							
a) Has the company disseminated its conflict gold policy to its suppliers (at minimum, 1st-tier suppliers)?	1 point	The policy must have been communicated directly to suppliers. Only posting to a website does not qualify. A brief description of the form of the communication must be provided to the Enough Project.	0	No information given	No information available	Did not file	No information available	N/A

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	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
b) Has the company provided or directly supported interactive trainings for one or more of its suppliers on responsible, conflict-free gold sourcing and due diligence aligned with the OECD Guidelines?	2 points	Trainings must be provided by the company or a relevant industry association and must be on the specific topic of responsible minerals sourcing aligned with the OECD Guidelines. The company must have implemented at least one training or supported an industry association training directly financially or in-kind that meets the aforementioned content requirements. Financial contributions to an industry association without a specific link to supplier trainings will not qualify. A brief description of the training and the company's role in delivering or supporting the training must be provided to the Enough Project.	0	No information given	No information available	Did not file	No information available	N/A
c) Has the company publicly committed to source only from audited conflict-free refiners, that is, refiners certified by the Conflict-Free Smelter Program or another OECD-compliant audit program consistent with the CFSP?	3 points	The commitment must be public, and it must require suppliers to source from only refiners certified by the CFSP or another OECD-compliant audit program consistent with the CFSP. Points are not given solely for inquiries as to whether or not suppliers or smelters are certified.	0	No information given	No information available	Did not file	No information available	N/A
d) Has the company made public the number of known refiners in its supply chain?	1.5 points	The public source containing the number must be made available to the Enough Project. No credit is given to companies that only publish the number of known suppliers, but publishing the number of known suppliers and refiners together is sufficient for credit.	0	No information given	No information available	Did not file	No information available	N/A
e) Has the company made public the names of known refiners in its supply chain?	1.5 points	The public source containing the names must be made available to the Enough Project. If the list contains the names of known refiners and suppliers, the refiners must be designated as such to receive credit.	0	No information given	No information available	Did not file	No information available	N/A
f) Has the company held a meeting or meetings with its supplier or suppliers to develop strategies for sourcing conflict-free gold from the Great Lakes region of Africa or Congo (at minimum, at least one meeting with at least one supplier)?	4 points: 1 for Great Lakes region, 3 for Congo	The meeting or meetings must specifically include discussion of sourcing conflict-free gold from the Great Lakes region of Africa or Congo. The Great Lakes region of Africa refers to Congo or any of the nine adjoining countries. A brief description of the discussion must be provided to the Enough Project.	0	No information given	No information available	Did not file	No information available	N/A
Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region	7 Total							
a) Is the company a member of the Public Private Alliance for Responsible Minerals Trade (PPA)?	3 points	The PPA must be able to verify membership.	0	No information given	No information available	Did not file	Is not a member of the PPA, as verified by the PPA	N/A

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	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
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 point for 1 forum, 2 points for multiple forums	Companies must be able to provide verification of attendance upon request.	0	No information given	No information available	Did not file	No information available	N/A
c) Is the company a member of the Responsible Jewellery Council (RJC) or the Initiative for Responsible Mining Assurance (IRMA)?	1 point	RJC or IRMA must be able to verify membership.	0	No information given	No information available	Did not file	No information available	N/A
d) Does the company participate in the monthly multi-stakeholder group (MSG) calls organized by the Responsible Sourcing Network (RSN)?	1 point: 1/2 point for participation 1-2 times; an additional 1/2 point for participation more than 2 times	The RSN must be able to verify participation.	0	No information given	No information available	Did not file	Does not participate in MSG calls, as verified by the Responsible Sourcing Network (call host)	N/A
Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region	30 Total							
a) Is the company actively encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo, for example, the Solutions for Hope Gold process, organized by Resolve, or an analogous initiative?	9 points: 2 points for making a public statement; 2 points for making an open call; 2 points for attending a past meeting; 3 points for attending a meeting after September 15, 2014 and before the publication of the Leaderboard	Companies will get credit for "encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo" if they do or have done one or several of the following: make a public statement (written or verbal) encouraging the development of conflict-free gold sourcing initiatives; make a public open call to other companies, suppliers, and non-governmental organizations to encourage the development of conflict-free gold sourcing initiatives in Congo; attend a multi-stakeholder meeting (past or future) specifically toward the development of conflict-free gold sourcing initiatives in Congo (e.g. an OECD forum session specifically on this topic, Solutions for Hope Gold meeting). A verifiable description of the action taken must be provided to the Enough Project.	0	No information given	No information available	Did not file	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 of the nine adjoining countries)?	6 points: 4 points for sourcing from the Great Lakes region, 2 additional points for sourcing specifically from Congo	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	0	No information given	No information available	Did not file	No information available	N/A

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	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
c) Is the company sourcing verifiably conflict-free gold specifically from the Kivu provinces of Congo?	11 points	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	0	No information given	No information available	Did not file	No information available	N/A
d) Does the company or company foundation support sustainable, 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	Companies must provide an overview of the project(s), as well as lists of the major stakeholders and beneficiaries, the implementing organization(s), geographic location and scope, project timeline, and amount contributed. The project(s) must adhere to or not be in contradiction to the following standards: OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Appendix: Suggested measures to create economic and development opportunities for artisanal and small-scale miners; Voluntary Principles for Security and Human Rights; Equator Principles; UN Principles for Responsible Investment; and recommendations in "Doing Good, while Doing Well: Is there a Win-Win Formula for Responsibly Investing in Congo's Minerals Sector?" Enough Project, July 2014.	0	No information given	No information available	Did not file	No information available	N/A
TOTAL	57		0					

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
Section 1: Company Policy	7 Total							
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 point for making the policy publicly available; an additional 1 point for making the policy easily accessible	The policy must explicitly mention conflict, conflict minerals, or require company adherence to industry association standards that explicitly mention conflict or conflict minerals. "Easily accessible" is defined as posted to the company's website or the Securities and Exchange Commission (SEC) website.	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	No information available	N/A
b) Has the company demonstrably 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 (OECD Guidelines)?	2 points	Full credit (2 points) is given to companies that have made a forward-looking commitment. Half credit (1 point) is given to companies that have used, implemented, or complied with such guidelines, but have not publicly committed to doing so in the future.	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."	No information available	N/A
c) Has the company disseminated its policy on conflict gold to all employees and consultants, including to subsidiaries, involved directly or indirectly in the sourcing and sales of products that contain gold?	1 point	The dissemination must have been more direct than posting to a website, and a brief description on the nature of the dissemination must be provided to the Enough Project.	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."	No information available	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
d) Has the company provided interactive employee training on the policy?	1 point	Training for a relevant subset of employees such as a working group qualifies for credit. A brief description of the nature of the training must be provided to the Enough Project.	1	No information given	No information available	"We communicated to our merchants and selected other internal personnel our commitment to comply with the Conflict Minerals Rule. We did so in writing, by telephone and through in-person meetings. In addition, 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."	No information available	N/A
e) Does the company have a specific conflict gold policy grievance mechanism by which employees, suppliers, or the public can anonymously and/or confidentially report possible violations of the policy?	1 point	To receive full credit for this question, the grievance mechanism must be specific to the conflict gold policy, or there must be a channel within a wider grievance mechanism for conflict gold policy violation reports. A brief description of the process in relation to conflict gold must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A
Section 2: Engagement with Suppliers	13 Total							
a) Has the company disseminated its conflict gold policy to its suppliers (at minimum, 1st-tier suppliers)?	1 point	The policy must have been communicated directly to suppliers. Only posting to a website does not qualify. A brief description of the form of the communication must be provided to the Enough Project.	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."	No information available	N/A
b) Has the company provided or directly supported interactive trainings for one or more of its suppliers on responsible, conflict-free gold sourcing and due diligence aligned with the OECD Guidelines?	2 points	Trainings must be provided by the company or a relevant industry association and must be on the specific topic of responsible minerals sourcing aligned with the OECD Guidelines. The company must have implemented at least one training or supported an industry association training directly financially or in-kind that meets the aforementioned content requirements. Financial contributions to an industry association without a specific link to supplier trainings will not qualify. A brief description of the training and the company's role in delivering or supporting the training must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	While the SEC Filings states that "We [Macy's] intend to... [d]evelop additional compliance training for relevant internal personnel and suppliers," there is no indication that trainings or direct support for trainings have yet been enacted.

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
c) Has the company publicly committed to source only from audited conflict-free refiners, that is, refiners certified by the Conflict-Free Smelter Program or another OECD-compliant audit program consistent with the CFSP?	3 points	The commitment must be public, and it must require suppliers to source from only refiners certified by the CFSP or another OECD-compliant audit program consistent with the CFSP. Points are not given solely for inquiries as to whether or not suppliers or smelters are certified.	0	No information given	"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."	No information available	No information available	No credit. The company "expects" suppliers to "seek minerals" from conflict-free sources, which is insufficient for credit. Commitment must be to source only from refiners that are certified by one or more specifically OECD-compliant programs.
d) Has the company made public the number of known refiners in its supply chain?	1.5 points	The public source containing the number must be made available to the Enough Project. No credit is given to companies that only publish the number of known suppliers, but publishing the number of known suppliers and refiners together is sufficient for credit.	0.75	No information given		"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."	No information available	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.
e) Has the company made public the names of known refiners in its supply chain?	1.5 points	The public source containing the names must be made available to the Enough Project. If the list contains the names of known refiners and suppliers, the refiners must be designated as such to receive credit.	0	No information given	No information available	No information available	No information available	N/A
f) Has the company held a meeting or meetings with its supplier or suppliers to develop strategies for sourcing conflict-free gold from the Great Lakes region of Africa or Congo (at minimum, at least one meeting with at least one supplier)?	4 points: 1 for Great Lakes region, 3 for Congo	The meeting or meetings must specifically include discussion of sourcing conflict-free gold from the Great Lakes region of Africa or Congo. The Great Lakes region of Africa refers to Congo or any of the nine adjoining countries. A brief description of the discussion must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A
Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region	7 Total							
a) Is the company a member of the Public Private Alliance for Responsible Minerals Trade (PPA)?	3 points	The PPA must be able to verify membership.	0	No information given	No information available	No information available	Is not a member of the PPA, as verified by the PPA	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 point for 1 forum, 2 points for multiple forums	Companies must be able to provide verification of attendance upon request.	0	No information given	No information available	No information available	No information available	N/A
c) Is the company a member of the Responsible Jewellery Council (RJC) or the Initiative for Responsible Mining Assurance (IRMA)?	1 point	RJC or IRMA must be able to verify membership.	0	No information given	No information available	No information available	No information available	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
d) Does the company participate in the monthly multi-stakeholder group (MSG) calls organized by the Responsible Sourcing Network (RSN)?	1 point: 1/2 point for participation 1-2 times; an additional 1/2 point for participation more than 2 times	The RSN must be able to verify participation.	0	No information given	No information available	No information available	Does not participate in MSG calls, as verified by the Responsible Sourcing Network (call host)	N/A
Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region	30 Total							
a) Is the company actively encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo, for example, the Solutions for Hope Gold process, organized by Resolve, or an analogous initiative?	9 points: 2 points for making a public statement; 2 points for making an open call; 2 points for attending a past meeting; 3 points for attending a meeting after September 15, 2014 and before the publication of the Leaderboard	Companies will get credit for "encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo" if they do or have done one or several of the following: make a public statement (written or verbal) encouraging the development of conflict-free gold sourcing initiatives; make a public open call to other companies, suppliers, and non-governmental organizations to encourage the development of conflict-free gold sourcing initiatives in Congo; attend a multi-stakeholder meeting (past or future) specifically toward the development of conflict-free gold sourcing initiatives in Congo (e.g. an OECD forum session specifically on this topic, Solutions for Hope Gold meeting). A verifiable description of the action taken must be provided to the Enough Project.	0	No information given	No information available	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 of the nine adjoining countries)?	6 points: 4 points for sourcing from the Great Lakes region, 2 additional points for sourcing specifically from Congo	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	0	No information given	No information available	No information available	No information available	N/A
c) Is the company sourcing verifiably conflict-free gold specifically from the Kivu provinces of Congo?	11 points	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	0	No information given	No information available	No information available	No information available	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
d) Does the company or company foundation support sustainable, 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	Companies must provide an overview of the project(s), as well as lists of the major stakeholders and beneficiaries, the implementing organization(s), geographic location and scope, project timeline, and amount contributed. The project(s) must adhere to or not be in contradiction to the following standards: OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Appendix: Suggested measures to create economic and development opportunities for artisanal and small-scale miners; Voluntary Principles for Security and Human Rights; Equator Principles; UN Principles for Responsible Investment; and recommendations in "Doing Good, while Doing Well: Is there a Win-Win Formula for Responsibly Investing in Congo's Minerals Sector?" Enough Project, July 2014.	0	No information given	No information available	No information available	No information available	N/A
TOTAL	57		7.75					

Neiman Marcus Group

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[Neiman Marcus SEC Filings](#)

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	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
Section 1: Company Policy	7 Total							
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 point for making the policy publicly available; an additional 1 point for making the policy easily accessible	The policy must explicitly mention conflict, conflict minerals, or require company adherence to industry association standards that explicitly mention conflict or conflict minerals. "Easily accessible" is defined as posted to the company's website or the Securities and Exchange Commission (SEC) website.	0	No information given	No information available	No information available	No information available	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.
b) Has the company demonstrably 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 (OECD Guidelines)?	2 points	Full credit (2 points) is given to companies that have made a forward-looking commitment. Half credit (1 point) is given to companies that have used, implemented, or complied with such guidelines, but have not publicly committed to doing so in the future.	0	No information given	No information available	No information available	No information available	N/A
c) Has the company disseminated its policy on conflict gold to all employees and consultants, including to subsidiaries, involved directly or indirectly in the sourcing and sales of products that contain gold?	1 point	The dissemination must have been more direct than posting to a website, and a brief description on the nature of the dissemination must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A
d) Has the company provided interactive employee training on the policy?	1 point	Training for a relevant subset of employees such as a working group qualifies for credit. A brief description of the nature of the training must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A
e) Does the company have a specific conflict gold policy grievance mechanism by which employees, suppliers, or the public can anonymously and/or confidentially report possible violations of the policy?	1 point	To receive full credit for this question, the grievance mechanism must be specific to the conflict gold policy, or there must be a channel within a wider grievance mechanism for conflict gold policy violation reports. A brief description of the process in relation to conflict gold must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A
Section 2: Engagement with Suppliers	13 Total							
a) Has the company disseminated its conflict gold policy to its suppliers (at minimum, 1st-tier suppliers)?	1 point	The policy must have been communicated directly to suppliers. Only posting to a website does not qualify. A brief description of the form of the communication must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A

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	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
b) Has the company provided or directly supported interactive trainings for one or more of its suppliers on responsible, conflict-free gold sourcing and due diligence aligned with the OECD Guidelines?	2 points	Trainings must be provided by the company or a relevant industry association and must be on the specific topic of responsible minerals sourcing aligned with the OECD Guidelines. The company must have implemented at least one training or supported an industry association training directly financially or in-kind that meets the aforementioned content requirements. Financial contributions to an industry association without a specific link to supplier trainings will not qualify. A brief description of the training and the company's role in delivering or supporting the training must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A
c) Has the company publicly committed to source only from audited conflict-free refiners, that is, refiners certified by the Conflict-Free Smelter Program or another OECD-compliant audit program consistent with the CFSP?	3 points	The commitment must be public, and it must require suppliers to source from only refiners certified by the CFSP or another OECD-compliant audit program consistent with the CFSP. Points are not given solely for inquiries as to whether or not suppliers or smelters are certified.	0	No information given	No information available	No information available	No information available	N/A
d) Has the company made public the number of known refiners in its supply chain?	1.5 points	The public source containing the number must be made available to the Enough Project. No credit is given to companies that only publish the number of known suppliers, but publishing the number of known suppliers and refiners together is sufficient for credit.	0	No information given	No information available	No information available	No information available	N/A
e) Has the company made public the names of known refiners in its supply chain?	1.5 points	The public source containing the names must be made available to the Enough Project. If the list contains the names of known refiners and suppliers, the refiners must be designated as such to receive credit.	0	No information given	No information available	No information available	No information available	N/A
f) Has the company held a meeting or meetings with its supplier or suppliers to develop strategies for sourcing conflict-free gold from the Great Lakes region of Africa or Congo (at minimum, at least one meeting with at least one supplier)?	4 points: 1 for Great Lakes region, 3 for Congo	The meeting or meetings must specifically include discussion of sourcing conflict-free gold from the Great Lakes region of Africa or Congo. The Great Lakes region of Africa refers to Congo or any of the nine adjoining countries. A brief description of the discussion must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A
Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region	7 Total							
a) Is the company a member of the Public Private Alliance for Responsible Minerals Trade (PPA)?	3 points	The PPA must be able to verify membership.	0	No information given	No information available	No information available	Is not a member of the PPA, as verified by the PPA	N/A

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	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
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 point for 1 forum, 2 points for multiple forums	Companies must be able to provide verification of attendance upon request.	0	No information given	No information available	No information available	No information available	N/A
c) Is the company a member of the Responsible Jewellery Council (RJC) or the Initiative for Responsible Mining Assurance (IRMA)?	1 point	RJC or IRMA must be able to verify membership.	0	No information given	No information available	No information available	No information available	N/A
d) Does the company participate in the monthly multi-stakeholder group (MSG) calls organized by the Responsible Sourcing Network (RSN)?	1 point: 1/2 point for participation 1-2 times; an additional 1/2 point for participation more than 2 times	The RSN must be able to verify participation.	0	No information given	No information available	No information available	Does not participate in the MSG calls, as verified by the Responsible Sourcing Network (call host)	N/A
Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region	30 Total							
a) Is the company actively encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo, for example, the Solutions for Hope Gold process, organized by Resolve, or an analogous initiative?	9 points: 2 points for making a public statement; 2 points for making an open call; 2 points for attending a past meeting; 3 points for attending a meeting after September 15, 2014 and before the publication of the Leaderboard	Companies will get credit for "encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo" if they do or have done one or several of the following: make a public statement (written or verbal) encouraging the development of conflict-free gold sourcing initiatives; make a public open call to other companies, suppliers, and non-governmental organizations to encourage the development of conflict-free gold sourcing initiatives in Congo; attend a multi-stakeholder meeting (past or future) specifically toward the development of conflict-free gold sourcing initiatives in Congo (e.g. an OECD forum session specifically on this topic, Solutions for Hope Gold meeting). A verifiable description of the action taken must be provided to the Enough Project.	0	No information given	No information available	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 of the nine adjoining countries)?	6 points: 4 points for sourcing from the Great Lakes region, 2 additional points for sourcing specifically from Congo	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	0	No information given	No information available	No information available	No information available	N/A

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	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
c) Is the company sourcing verifiably conflict-free gold specifically from the Kivu provinces of Congo?	11 points	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	0	No information given	No information available	No information available	No information available	N/A
d) Does the company or company foundation support sustainable, 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	Companies must provide an overview of the project(s), as well as lists of the major stakeholders and beneficiaries, the implementing organization(s), geographic location and scope, project timeline, and amount contributed. The project(s) must adhere to or not be in contradiction to the following standards: OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Appendix: Suggested measures to create economic and development opportunities for artisanal and small-scale miners; Voluntary Principles for Security and Human Rights; Equator Principles; UN Principles for Responsible Investment; and recommendations in "Doing Good, while Doing Well: Is there a Win-Win Formula for Responsibly Investing in Congo's Minerals Sector?" Enough Project, July 2014.	0	No information given	No information available	No information available	No information available	N/A
TOTAL	57		0					

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
Section 1: Company Policy	7 Total							
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 point for making the policy publicly available; an additional 1 point for making the policy easily accessible	The policy must explicitly mention conflict, conflict minerals, or require company adherence to industry association standards that explicitly mention conflict or conflict minerals. "Easily accessible" is defined as posted to the company's website or the Securities and Exchange Commission (SEC) website.	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	No information available	N/A
b) Has the company demonstrably 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 (OECD Guidelines)?	2 points	Full credit (2 points) is given to companies that have made a forward-looking commitment. Half credit (1 point) is given to companies that have used, implemented, or complied with such guidelines, but have not publicly committed to doing so in the future.	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'). 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."	No information available	N/A
c) Has the company disseminated its policy on conflict gold to all employees and consultants, including to subsidiaries, involved directly or indirectly in the sourcing and sales of products that contain gold?	1 point	The dissemination must have been more direct than posting to a website, and a brief description on the nature of the dissemination must be provided to the Enough Project.	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."	No information available	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
d) Has the company provided interactive employee training on the policy?	1 point	Training for a relevant subset of employees such as a working group qualifies for credit. A brief description of the nature of the training must be provided to the Enough Project.	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."	No information available	N/A
e) Does the company have a specific conflict gold policy grievance mechanism by which employees, suppliers, or the public can anonymously and/or confidentially report possible violations of the policy?	1 point	To receive full credit for this question, the grievance mechanism must be specific to the conflict gold policy, or there must be a channel within a wider grievance mechanism for conflict gold policy violation reports. A brief description of the process in relation to conflict gold must be provided to the Enough Project.	1	No information given	No information available	"Thus far in 2014, we have taken the following additional steps 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: ... 2. We established a mechanism for employees, suppliers and other interested parties to report concerns regarding, or suspected violations of, the Conflict Minerals Policy."	No information available	N/A
Section 2: Engagement with Suppliers	13 Total							
a) Has the company disseminated its conflict gold policy to its suppliers (at minimum, 1st-tier suppliers)?	1 point	The policy must have been communicated directly to suppliers. Only posting to a website does not qualify. A brief description of the form of the communication must be provided to the Enough Project.	1	No information given	No information available	"The Conflict Minerals Policy also was communicated in writing to Suppliers, and posted on our website."	No information available	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
b) Has the company provided or directly supported interactive trainings for one or more of its suppliers on responsible, conflict-free gold sourcing and due diligence aligned with the OECD Guidelines?	2 points	Trainings must be provided by the company or a relevant industry association and must be on the specific topic of responsible minerals sourcing aligned with the OECD Guidelines. The company must have implemented at least one training or supported an industry association training directly financially or in-kind that meets the aforementioned content requirements. Financial contributions to an industry association without a specific link to supplier trainings will not qualify. A brief description of the training and the company's role in delivering or supporting the training must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A
c) Has the company publicly committed to source only from audited conflict-free refiners, that is, refiners certified by the Conflict-Free Smelter Program or another OECD-compliant audit program consistent with the CFSP?	3 points	The commitment must be public, and it must require suppliers to source from only refiners certified by the CFSP or another OECD-compliant audit program consistent with the CFSP. Points are not given solely for inquiries as to whether or not suppliers or smelters are certified.	0	No information given	No information available	No information available	No information available	N/A
d) Has the company made public the number of known refiners in its supply chain?	1.5 points	The public source containing the number must be made available to the Enough Project. No credit is given to companies that only publish the number of known suppliers, but publishing the number of known suppliers and refiners together is sufficient for credit.	0	No information given	No information available	No information available	No information available	N/A
e) Has the company made public the names of known refiners in its supply chain?	1.5 points	The public source containing the names must be made available to the Enough Project. If the list contains the names of known refiners and suppliers, the refiners must be designated as such to receive credit.	0	No information given	No information available	No information available	No information available	N/A
f) Has the company held a meeting or meetings with its supplier or suppliers to develop strategies for sourcing conflict-free gold from the Great Lakes region of Africa or Congo (at minimum, at least one meeting with at least one supplier)?	4 points: 1 for Great Lakes region, 3 for Congo	The meeting or meetings must specifically include discussion of sourcing conflict-free gold from the Great Lakes region of Africa or Congo. The Great Lakes region of Africa refers to Congo or any of the nine adjoining countries. A brief description of the discussion must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A
Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region	7 Total							
a) Is the company a member of the Public Private Alliance for Responsible Minerals Trade (PPA)?	3 points	The PPA must be able to verify membership.	0	No information given	No information available	No information available	Is not a member of the PPA, as verified by the PPA	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
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 point for 1 forum, 2 points for multiple forums	Companies must be able to provide verification of attendance upon request.	0	No information given	No information available	No information available	No information available	N/A
c) Is the company a member of the Responsible Jewellery Council (RJC) or the Initiative for Responsible Mining Assurance (IRMA)?	1 point	RJC or IRMA must be able to verify membership.	0	No information given	No information available	No information available	No information available	N/A
d) Does the company participate in the monthly multi-stakeholder group (MSG) calls organized by the Responsible Sourcing Network (RSN)?	1 point: 1/2 point for participation 1-2 times; an additional 1/2 point for participation more than 2 times	The RSN must be able to verify participation.	0	No information given	No information available	No information available	Does not participate in MSG calls, as verified by the Responsible Sourcing Network (call host)	N/A
Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region	30 Total							
a) Is the company actively encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo, for example, the Solutions for Hope Gold process, organized by Resolve, or an analogous initiative?	9 points: 2 points for making a public statement; 2 points for making an open call; 2 points for attending a past meeting; 3 points for attending a meeting after September 15, 2014 and before the publication of the Leaderboard	Companies will get credit for "encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo" if they do or have done one or several of the following: make a public statement (written or verbal) encouraging the development of conflict-free gold sourcing initiatives; make a public open call to other companies, suppliers, and non-governmental organizations to encourage the development of conflict-free gold sourcing initiatives in Congo; attend a multi-stakeholder meeting (past or future) specifically toward the development of conflict-free gold sourcing initiatives in Congo (e.g. an OECD forum session specifically on this topic, Solutions for Hope Gold meeting). A verifiable description of the action taken must be provided to the Enough Project.	0	No information given	No information available	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 of the nine adjoining countries)?	6 points: 4 points for sourcing from the Great Lakes region, 2 additional points for sourcing specifically from Congo	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	0	No information given	No information available	No information available	No information available	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
c) Is the company sourcing verifiably conflict-free gold specifically from the Kivu provinces of Congo?	11 points	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	0	No information given	No information available	No information available	No information available	N/A
d) Does the company or company foundation support sustainable, 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	Companies must provide an overview of the project(s), as well as lists of the major stakeholders and beneficiaries, the implementing organization(s), geographic location and scope, project timeline, and amount contributed. The project(s) must adhere to or not be in contradiction to the following standards: OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Appendix: Suggested measures to create economic and development opportunities for artisanal and small-scale miners; Voluntary Principles for Security and Human Rights; Equator Principles; UN Principles for Responsible Investment; and recommendations in "Doing Good, while Doing Well: Is there a Win-Win Formula for Responsibly Investing in Congo's Minerals Sector?" Enough Project, July 2014.	0	No information given	No information available	No information available	No information available	N/A
TOTAL	57		8					

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
Section 1: Company Policy	7 Total							
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 point for making the policy publicly available; an additional 1 point for making the policy easily accessible	The policy must explicitly mention conflict, conflict minerals, or require company adherence to industry association standards that explicitly mention conflict or conflict minerals. "Easily accessible" is defined as posted to the company's website or the Securities and Exchange Commission (SEC) website.	0	No information given	No information available	Did not file	No information available	N/A
b) Has the company demonstrably 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 (OECD Guidelines)?	2 points	Full credit (2 points) is given to companies that have made a forward-looking commitment. Half credit (1 point) is given to companies that have used, implemented, or complied with such guidelines, but have not publicly committed to doing so in the future.	0	No information given	No information available	Did not file	No information available	N/A
c) Has the company disseminated its policy on conflict gold to all employees and consultants, including to subsidiaries, involved directly or indirectly in the sourcing and sales of products that contain gold?	1 point	The dissemination must have been more direct than posting to a website, and a brief description on the nature of the dissemination must be provided to the Enough Project.	0	No information given	No information available	Did not file	No information available	N/A
d) Has the company provided interactive employee training on the policy?	1 point	Training for a relevant subset of employees such as a working group qualifies for credit. A brief description of the nature of the training must be provided to the Enough Project.	0	No information given	No information available	Did not file	No information available	N/A
e) Does the company have a specific conflict gold policy grievance mechanism by which employees, suppliers, or the public can anonymously and/or confidentially report possible violations of the policy?	1 point	To receive full credit for this question, the grievance mechanism must be specific to the conflict gold policy, or there must be a channel within a wider grievance mechanism for conflict gold policy violation reports. A brief description of the process in relation to conflict gold must be provided to the Enough Project.	0	No information given	No information available	Did not file	No information available	N/A
Section 2: Engagement with Suppliers	13 Total							
a) Has the company disseminated its conflict gold policy to its suppliers (at minimum, 1st-tier suppliers)?	1 point	The policy must have been communicated directly to suppliers. Only posting to a website does not qualify. A brief description of the form of the communication must be provided to the Enough Project.	0	No information given	No information available	Did not file	No information available	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
b) Has the company provided or directly supported interactive trainings for one or more of its suppliers on responsible, conflict-free gold sourcing and due diligence aligned with the OECD Guidelines?	2 points	Trainings must be provided by the company or a relevant industry association and must be on the specific topic of responsible minerals sourcing aligned with the OECD Guidelines. The company must have implemented at least one training or supported an industry association training directly financially or in-kind that meets the aforementioned content requirements. Financial contributions to an industry association without a specific link to supplier trainings will not qualify. A brief description of the training and the company's role in delivering or supporting the training must be provided to the Enough Project.	0	No information given	No information available	Did not file	No information available	N/A
c) Has the company publicly committed to source only from audited conflict-free refiners, that is, refiners certified by the Conflict-Free Smelter Program or another OECD-compliant audit program consistent with the CFSP?	3 points	The commitment must be public, and it must require suppliers to source from only refiners certified by the CFSP or another OECD-compliant audit program consistent with the CFSP. Points are not given solely for inquiries as to whether or not suppliers or smelters are certified.	0	No information given	No information available	Did not file	No information available	N/A
d) Has the company made public the number of known refiners in its supply chain?	1.5 points	The public source containing the number must be made available to the Enough Project. No credit is given to companies that only publish the number of known suppliers, but publishing the number of known suppliers and refiners together is sufficient for credit.	0	No information given	No information available	Did not file	No information available	N/A
e) Has the company made public the names of known refiners in its supply chain?	1.5 points	The public source containing the names must be made available to the Enough Project. If the list contains the names of known refiners and suppliers, the refiners must be designated as such to receive credit.	0	No information given	No information available	Did not file	No information available	N/A
f) Has the company held a meeting or meetings with its supplier or suppliers to develop strategies for sourcing conflict-free gold from the Great Lakes region of Africa or Congo (at minimum, at least one meeting with at least one supplier)?	4 points: 1 for Great Lakes region, 3 for Congo	The meeting or meetings must specifically include discussion of sourcing conflict-free gold from the Great Lakes region of Africa or Congo. The Great Lakes region of Africa refers to Congo or any of the nine adjoining countries. A brief description of the discussion must be provided to the Enough Project.	0	No information given	No information available	Did not file	No information available	N/A
Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region	7 Total							
a) Is the company a member of the Public Private Alliance for Responsible Minerals Trade (PPA)?	3 points	The PPA must be able to verify membership.	0	No information given	No information available	Did not file	Is not a member of the PPA, as verified by the PPA	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
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 point for 1 forum, 2 points for multiple forums	Companies must be able to provide verification of attendance upon request.	0	No information given	No information available	Did not file	No information available	N/A
c) Is the company a member of the Responsible Jewellery Council (RJC) or the Initiative for Responsible Mining Assurance (IRMA)?	1 point	RJC or IRMA must be able to verify membership.	0	No information given	No information available	Did not file	No information available	N/A
d) Does the company participate in the monthly multi-stakeholder group (MSG) calls organized by the Responsible Sourcing Network (RSN)?	1 point: 1/2 point for participation 1-2 times; an additional 1/2 point for participation more than 2 times	The RSN must be able to verify participation.	0	No information given	No information available	Did not file	Does not participate in MSG calls, as verified by the Responsible Sourcing Network (call host)	N/A
Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region	30 Total							
a) Is the company actively encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo, for example, the Solutions for Hope Gold process, organized by Resolve, or an analogous initiative?	9 points: 2 points for making a public statement; 2 points for making an open call; 2 points for attending a past meeting; 3 points for attending a meeting after September 15, 2014 and before the publication of the Leaderboard	Companies will get credit for "encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo" if they do or have done one or several of the following: make a public statement (written or verbal) encouraging the development of conflict-free gold sourcing initiatives; make a public open call to other companies, suppliers, and non-governmental organizations to encourage the development of conflict-free gold sourcing initiatives in Congo; attend a multi-stakeholder meeting (past or future) specifically toward the development of conflict-free gold sourcing initiatives in Congo (e.g. an OECD forum session specifically on this topic, Solutions for Hope Gold meeting). A verifiable description of the action taken must be provided to the Enough Project.	0	No information given	No information available	Did not file	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 of the nine adjoining countries)?	6 points: 4 points for sourcing from the Great Lakes region, 2 additional points for sourcing specifically from Congo	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	0	No information given	No information available	Did not file	No information available	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
c) Is the company sourcing verifiably conflict-free gold specifically from the Kivu provinces of Congo?	11 points	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	0	No information given	No information available	Did not file	No information available	N/A
d) Does the company or company foundation support sustainable, 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	Companies must provide an overview of the project(s), as well as lists of the major stakeholders and beneficiaries, the implementing organization(s), geographic location and scope, project timeline, and amount contributed. The project(s) must adhere to or not be in contradiction to the following standards: OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Appendix: Suggested measures to create economic and development opportunities for artisanal and small-scale miners; Voluntary Principles for Security and Human Rights; Equator Principles; UN Principles for Responsible Investment; and recommendations in "Doing Good, while Doing Well: Is there a Win-Win Formula for Responsibly Investing in Congo's Minerals Sector?" Enough Project, July 2014.	0	No information given	No information available	Did not file	No information available	N/A
TOTAL	57		0					

Sears Holdings Limited

[Sears Conflict Minerals Policy](#)

[IRMA Participants](#)

[RJC Members](#)

[Sears SEC Filings](#)

[PPA Participants](#)

[RSN Partners](#)

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
Section 1: Company Policy	7 Total							
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 point for making the policy publicly available; an additional 1 point for making the policy easily accessible	The policy must explicitly mention conflict, conflict minerals, or require company adherence to industry association standards that explicitly mention conflict or conflict minerals. "Easily accessible" is defined as posted to the company's website or the Securities and Exchange Commission (SEC) website.	2	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	No information available	N/A
b) Has the company demonstrably 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 (OECD Guidelines)?	2 points	Full credit (2 points) is given to companies that have made a forward-looking commitment. Half credit (1 point) is given to companies that have used, implemented, or complied with such guidelines, but have not publicly committed to doing so in the future.	2	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.... For future reporting periods, the Domestic Operating Companies'...will endeavor to improve upon its supply chain due diligence efforts and expand the scope of its due diligence by reviewing and assessing the source and chain of custody of 3TG within its supply chain and working with its Suppliers to increase transparency of their supply chain."	No information available	N/A
c) Has the company disseminated its policy on conflict gold to all employees and consultants, including to subsidiaries, involved directly or indirectly in the sourcing and sales of products that contain gold?	1 point	The dissemination must have been more direct than posting to a website, and a brief description on the nature of the dissemination must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A
d) Has the company provided interactive employee training on the policy?	1 point	Training for a relevant subset of employees such as a working group qualifies for credit. A brief description of the nature of the training must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A
e) Does the company have a specific conflict gold policy grievance mechanism by which employees, suppliers, or the public can anonymously and/or confidentially report possible violations of the policy?	1 point	To receive full credit for this question, the grievance mechanism must be specific to the conflict gold policy, or there must be a channel within a wider grievance mechanism for conflict gold policy violation reports. A brief description of the process in relation to conflict gold must be provided to the Enough Project.	1	No information given	No information available	"Established a company-level and industry-wide, grievance mechanism through creation of a conflict minerals specific email, and identified alternate mechanisms already available both internally and externally."	No information available	N/A
Section 2: Engagement with Suppliers	13 Total							

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
a) Has the company disseminated its conflict gold policy to its suppliers (at minimum, 1st-tier suppliers)?	1 point	The policy must have been communicated directly to suppliers. Only posting to a website does not qualify. A brief description of the form of the communication must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	No credit. While the SEC Filing detailed excellent supplier communication regarding compliance requirements and requesting conflict minerals information, the communication did not appear to relate directly to the policy. Clarification was sought from Sears but the company did not respond.
b) Has the company provided or directly supported interactive trainings for one or more of its suppliers on responsible, conflict-free gold sourcing and due diligence aligned with the OECD Guidelines?	2 points	Trainings must be provided by the company or a relevant industry association and must be on the specific topic of responsible minerals sourcing aligned with the OECD Guidelines. The company must have implemented at least one training or supported an industry association training directly financially or in-kind that meets the aforementioned content requirements. Financial contributions to an industry association without a specific link to supplier trainings will not qualify. A brief description of the training and the company's role in delivering or supporting the training must be provided to the Enough Project.	0	No information given	No information available	"Introductory emails were sent to Tier 1 Suppliers describing the compliance requirements and requesting conflict minerals information. Suppliers were also provided access to training.... Implemented internal measures taken to strengthen engagement with Suppliers through ongoing training efforts of the Domestic Operating Compaies' merchant groups and Suppliers."	No information available	The information related to supplier trainings does not amount to a sufficiently detailed description of a training related specifically to conflict-free gold sourcing and OECD-aligned due diligence.
c) Has the company publicly committed to source only from audited conflict-free refiners, that is, refiners certified by the Conflict-Free Smelter Program or another OECD-compliant audit program consistent with the CFSP?	3 points	The commitment must be public, and it must require suppliers to source from only refiners certified by the CFSP or another OECD-compliant audit program consistent with the CFSP. Points are not given solely for inquiries as to whether or not suppliers or smelters are certified.	0	No information given	No information available	No information available	No information available	N/A
d) Has the company made public the number of known refiners in its supply chain?	1.5 points	The public source containing the number must be made available to the Enough Project. No credit is given to companies that only publish the number of known suppliers, but publishing the number of known suppliers and refiners together is sufficient for credit.	0	No information given	No information available	No information available	No information available	N/A
e) Has the company made public the names of known refiners in its supply chain?	1.5 points	The public source containing the names must be made available to the Enough Project. If the list contains the names of known refiners and suppliers, the refiners must be designated as such to receive credit.	0	No information given	No information available	No information available	No information available	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
f) Has the company held a meeting or meetings with its supplier or suppliers to develop strategies for sourcing conflict-free gold from the Great Lakes region of Africa or Congo (at minimum, at least one meeting with at least one supplier)?	4 points: 1 for Great Lakes region, 3 for Congo	The meeting or meetings must specifically include discussion of sourcing conflict-free gold from the Great Lakes region of Africa or Congo. The Great Lakes region of Africa refers to Congo or any of the nine adjoining countries. A brief description of the discussion must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A
Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region	7 Total							
a) Is the company a member of the Public Private Alliance for Responsible Minerals Trade (PPA)?	3 points	The PPA must be able to verify membership.	0	No information given	No information available	No information available	Is not a member of the PPA, as verified by the PPA	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 point for 1 forum, 2 points for multiple forums	Companies must be able to provide verification of attendance upon request.	0	No information given	No information available	No information available	No information available	N/A
c) Is the company a member of the Responsible Jewellery Council (RJC) or the Initiative for Responsible Mining Assurance (IRMA)?	1 point	RJC or IRMA must be able to verify membership.	0	No information given	No information available	No information available	No information available	N/A
d) Does the company participate in the monthly multi-stakeholder group (MSG) calls organized by the Responsible Sourcing Network (RSN)?	1 point: 1/2 point for participation 1-2 times; an additional 1/2 point for participation more than 2 times	The RSN must be able to verify participation.	0	No information given	No information available	No information available	Does not participate in MSG calls, as verified by the Responsible Sourcing Network (call host)	N/A
Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region	30 Total							
a) Is the company actively encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo, for example, the Solutions for Hope Gold process, organized by Resolve, or an analogous initiative?	9 points: 2 points for making a public statement; 2 points for making an open call; 2 points for attending a past meeting; 3 points for attending a meeting after September 15, 2014 and before the publication of the Leaderboard	Companies will get credit for "encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo" if they do or have done one or several of the following: make a public statement (written or verbal) encouraging the development of conflict-free gold sourcing initiatives; make a public open call to other companies, suppliers, and non-governmental organizations to encourage the development of conflict-free gold sourcing initiatives in Congo; attend a multi-stakeholder meeting (past or future) specifically toward the development of conflict-free gold sourcing initiatives in Congo (e.g. an OECD forum session specifically on this topic, Solutions for Hope Gold meeting). A verifiable description of the action taken must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A

Sears Holdings Limited

[Sears Conflict Minerals Policy](#)

[IRMA Participants](#)

[RJC Members](#)

[Sears SEC Filings](#)

[PPA Participants](#)

[RSN Partners](#)

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
b) Is the company sourcing verifiably conflict-free gold from the Great Lakes region of Africa (the Democratic Republic of the Congo or of the nine adjoining countries)?	6 points: 4 points for sourcing from the Great Lakes region, 2 additional points for sourcing specifically from Congo	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	0	No information given	No information available	No information available	No information available	N/A
c) Is the company sourcing verifiably conflict-free gold specifically from the Kivu provinces of Congo?	11 points	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	0	No information given	No information available	No information available	No information available	N/A
d) Does the company or company foundation support sustainable, 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	Companies must provide an overview of the project(s), as well as lists of the major stakeholders and beneficiaries, the implementing organization(s), geographic location and scope, project timeline, and amount contributed. The project(s) must adhere to or not be in contradiction to the following standards: OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Appendix: Suggested measures to create economic and development opportunities for artisanal and small-scale miners; Voluntary Principles for Security and Human Rights; Equator Principles; UN Principles for Responsible Investment; and recommendations in "Doing Good, while Doing Well: Is there a Win-Win Formula for Responsibly Investing in Congo's Minerals Sector?" Enough Project, July 2014.	0	No information given	No information available	No information available	No information available	N/A
TOTAL	57		5					

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
Section 1: Company Policy	7 Total							
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 point for making the policy publicly available; an additional 1 point for making the policy easily accessible	The policy must explicitly mention conflict, conflict minerals, or require company adherence to industry association standards that explicitly mention conflict or conflict minerals. "Easily accessible" is defined as posted to the company's website or the Securities and Exchange Commission (SEC) website.	2	No information given	"Signet Jewelers Limited and our US and UK operations (Signet) are fully committed to the responsible sourcing of our products and the respect of human rights, and we expect the same from our suppliers around the world. We continually strive to assure our customers, employees, investors and other stakeholders that our supply chain avoids action that may directly or indirectly finance armed conflict and serious human rights violations around the world including the Democratic Republic of Congo and its adjoining countries. Signet has been at the forefront of responsible sourcing in the jewelry supply chain. Signet is a founding and certified member of the Responsible Jewellery Council (RJC), an organization that is committed to promoting responsible ethical, human rights, social and environmental practices throughout the jewelry supply chain. As a founding member and active participant, we fully support the RJC's membership Code of Practices and Chain of Custody standards. 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. 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."	"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."	No information available	N/A
b) Has the company demonstrably 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 (OECD Guidelines)?	2 points	Full credit (2 points) is given to companies that have made a forward-looking commitment. Half credit (1 point) is given to companies that have used, implemented, or complied with such guidelines, but have not publicly committed to doing so in the future.	2	No information given	"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.'"	In addition to the available information, Signet Jewelers has committed to implement OECD Due Diligence Guidelines based on Enough Project observations of public presentations by Signet representatives.	N/A
c) Has the company disseminated its policy on conflict gold to all employees and consultants, including to subsidiaries, involved directly or indirectly in the sourcing and sales of products that contain gold?	1 point	The dissemination must have been more direct than posting to a website, and a brief description on the nature of the dissemination must be provided to the Enough Project.	1	"[Yes]; through regular team meetings, emails, and company briefings."	No information available	No information available	No information available	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
d) Has the company provided interactive employee training on the policy?	1 point	Training for a relevant subset of employees such as a working group qualifies for credit. A brief description of the nature of the training must be provided to the Enough Project.	1	No information given	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..."	No information available	N/A
e) Does the company have a specific conflict gold policy grievance mechanism by which employees, suppliers, or the public can anonymously and/or confidentially report possible violations of the policy?	1 point	To receive full credit for this question, the grievance mechanism must be specific to the conflict gold policy, or there must be a channel within a wider grievance mechanism for conflict gold policy violation reports. A brief description of the process in relation to conflict gold must be provided to the Enough Project.	1	"Yes, suppliers can access a dedicated portal (www.signetsrsp.com) and a helpline which can be anonymous."	No information available	No information available	No information available	N/A
Section 2: Engagement with Suppliers	13 Total							
a) Has the company disseminated its conflict gold policy to its suppliers (at minimum, 1st-tier suppliers)?	1 point	The policy must have been communicated directly to suppliers. Only posting to a website does not qualify. A brief description of the form of the communication must be provided to the Enough Project.	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."	No information available	No information available	N/A
b) Has the company provided or directly supported interactive trainings for one or more of its suppliers on responsible, conflict-free gold sourcing and due diligence aligned with the OECD Guidelines?	2 points	Trainings must be provided by the company or a relevant industry association and must be on the specific topic of responsible minerals sourcing aligned with the OECD Guidelines. The company must have implemented at least one training or supported an industry association training directly financially or in-kind that meets the aforementioned content requirements. Financial contributions to an industry association without a specific link to supplier trainings will not qualify. A brief description of the training and the company's role in delivering or supporting the training must be provided to the Enough Project.	2	"Signet has conducted several webinars for all its suppliers to explain the SRSPs and how these relate and are consistent with OECD guidelines. OECD staff (Tyler Gillard) and RJC (Standards Director) have been included in some of these webinars. Our training and support of OECD guidelines to our suppliers, our staff and our auditors have been extensive."	No information available	"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: ... b. devising and adopting a risk management plan, which includes: ... ii. facilitating training and education for suppliers and other stakeholders on the SRSPs and other due diligence measures..."	No information available	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
c) Has the company publicly committed to source only from audited conflict-free refiners, that is, refiners certified by the Conflict-Free Smelter Program or another OECD-compliant audit program consistent with the CFSP?	3 points	The commitment must be public, and it must require suppliers to source from only refiners certified by the CFSP or another OECD-compliant audit program consistent with the CFSP. Points are not given solely for inquiries as to whether or not suppliers or smelters are certified.	0	"The SRSP for gold stipulates that all gold should be sourced from certified sources - the CFSI and the LBMA Responsible Gold Standards are quoted as compliance criteria."	No information available	No information available	No information available	Credit requires a commitment to source only from CFSP or another OECD compliant audit program consistent with CFSP. Signet's SRSPs currently list the Dubai Multi Commodities Centre's (DMCC) Good Delivery List as an acceptable program for suppliers, yet multiple investigations in early 2014 pointed to the fact that DMCC protocols had shifted and were not in line with internationally accepted conflict-free standards.
d) Has the company made public the number of known refiners in its supply chain?	1.5 points	The public source containing the number must be made available to the Enough Project. No credit is given to companies that only publish the number of known suppliers, but publishing the number of known suppliers and refiners together is sufficient for credit.	0	"Our view on the answers to these questions is that the public sources are the LBMA Good Delivery List for gold refiners and the CFSI conflict free smelter list for the 3Ts. Given the large number of Signet's global supplier base and the subcontractors, banks and refiners/smelters used by these suppliers, we believe that these are the best public sources rather than Signet repeating these lists ourselves."	No information available	No information available	No information available	Credit requires Signet to publish the number of refiners from which the company specifically sources.
e) Has the company made public the names of known refiners in its supply chain?	1.5 points	The public source containing the names must be made available to the Enough Project. If the list contains the names of known refiners and suppliers, the refiners must be designated as such to receive credit.	0	"Our view on the answers to these questions is that the public sources are the LBMA Good Delivery List for gold refiners and the CFSI conflict free smelter list for the 3Ts. Given the large number of Signet's global supplier base and the subcontractors, banks and refiners/smelters used by these suppliers, we believe that these are the best public sources rather than Signet repeating these lists ourselves."	No information available	No information available	No information available	Credit requires Signet to publish the list of names of refiners from which the company specifically sources.

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
f) Has the company held a meeting or meetings with its supplier or suppliers to develop strategies for sourcing conflict-free gold from the Great Lakes region of Africa or Congo (at minimum, at least one meeting with at least one supplier)?	4 points: 1 for Great Lakes region, 3 for Congo	The meeting or meetings must specifically include discussion of sourcing conflict-free gold from the Great Lakes region of Africa or Congo. The Great Lakes region of Africa refers to Congo or any of the nine adjoining countries. A brief description of the discussion must be provided to the Enough Project.	4	"Yes, in our regular briefings with suppliers, we have positively advocated sourcing from 'covered countries' providing those sources are certified and consistent with our protocols; It is a direct result of Signet's support of certified sources in the region (through CFSI and LBMA) that Signet has identified direct sourcing of tin in Rwanda and supports sourcing of gold through the Rand refinery. Signet is one of the very few US companies that encourages active sourcing from certified sources in the region, rather than the avoidance policies pursued by many other companies."	No information available	No information available	No information available	The Rand Refinery sources gold from Banro's and AngloGold Ashanti's operations in eastern Congo.
Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region	7 Total							
a) Is the company a member of the Public Private Alliance for Responsible Minerals Trade (PPA)?	3 points	The PPA must be able to verify membership.	0	No information given	No information available	No information available	Is not a member of the PPA, as verified by the PPA	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 point for 1 forum, 2 points for multiple forums	Companies must be able to provide verification of attendance upon request.	2	"Yes, Signet has attended all OECD meetings and Signet is a representative of the jewelry industry in the OECD Multi-Stakeholder Working Group."	No information available	No information available	No information available	Confirmed by Enough observations at OECD forums.
c) Is the company a member of the Responsible Jewellery Council (RJC) or the Initiative for Responsible Mining Assurance (IRMA)?	1 point	RJC or IRMA must be able to verify membership.	1	No information given	"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."	No information available	Listed as a member of RJC	N/A
d) Does the company participate in the monthly multi-stakeholder group (MSG) calls organized by the Responsible Sourcing Network (RSN)?	1 point: 1/2 point for participation 1-2 times; an additional 1/2 point for participation more than 2 times	The RSN must be able to verify participation.	0	No information given	No information available	No information available	Does not participate in MSG calls, as verified by the Responsible Sourcing Network (call host)	N/A
Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region	30 Total							

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
a) Is the company actively encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo, for example, the Solutions for Hope Gold process, organized by Resolve, or an analogous initiative?	9 points: 2 points for making a public statement; 2 points for making an open call; 2 points for attending a past meeting; 3 points for attending a meeting after September 15, 2014 and before the publication of the Leaderboard	Companies will get credit for "encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo" if they do or have done one or several of the following: make a public statement (written or verbal) encouraging the development of conflict-free gold sourcing initiatives; make a public open call to other companies, suppliers, and non-governmental organizations to encourage the development of conflict-free gold sourcing initiatives in Congo; attend a multi-stakeholder meeting (past or future) specifically toward the development of conflict-free gold sourcing initiatives in Congo (e.g. an OECD forum session specifically on this topic, Solutions for Hope Gold meeting). A verifiable description of the action taken must be provided to the Enough Project.	2	No information given	No information available	No information available	Based on information from a representative of Resolve, the coordinating organization of the Solutions for Hope Gold project, Signet attended a past meeting.	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 of the nine adjoining countries)?	6 points: 4 points for sourcing from the Great Lakes region, 2 additional points for sourcing specifically from Congo	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	6	"Yes, through the LBMA good delivery refinery structure, especially through Rand Refinery, which sources from DRC and several neighboring countries (esp. Tanzania)."	"Suppliers to Signet are recommended to ensure their gold supplies are from current LBMA 'good delivery' refineries (see gold list at www.lbma.org.uk)."	"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.'"	No information available	Full credit for deliberately sourcing from Rand Refinery, which knowingly sources gold from Congo.
c) Is the company sourcing verifiably conflict-free gold specifically from the Kivu provinces of Congo?	11 points	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	0	"Possibly, through the Rand Refinery (as above)."	No information available	No information available	No information available	Neither Signet nor third party experts can confirm that Rand Refinery is sourcing from the Kivus.

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
d) Does the company or company foundation support sustainable, 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	Companies must provide an overview of the project(s), as well as lists of the major stakeholders and beneficiaries, the implementing organization(s), geographic location and scope, project timeline, and amount contributed. The project(s) must adhere to or not be in contradiction to the following standards: OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Appendix: Suggested measures to create economic and development opportunities for artisanal and small-scale miners; Voluntary Principles for Security and Human Rights; Equator Principles; UN Principles for Responsible Investment; and recommendations in "Doing Good, while Doing Well: Is there a Win-Win Formula for Responsibly Investing in Congo's Minerals Sector?" Enough Project, July 2014.	0	No information given	No information available	No information available	No information available	N/A
TOTAL	57		25					

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
Section 1: Company Policy	7 Total							
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 point for making the policy publicly available; an additional 1 point for making the policy easily accessible	The policy must explicitly mention conflict, conflict minerals, or require company adherence to industry association standards that explicitly mention conflict or conflict minerals. "Easily accessible" is defined as posted to the company's website or the Securities and Exchange Commission (SEC) website.	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 https://corporate.target.com/corporate-responsibility/responsible-sourcing/social-compliance/labor-and-human-rights , is described in the Form SD that includes this Conflict Minerals Report as an exhibit."	No information available	N/A
b) Has the company demonstrably 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 (OECD Guidelines)?	2 points	Full credit (2 points) is given to companies that have made a forward-looking commitment. Half credit (1 point) is given to companies that have used, implemented, or complied with such guidelines, but have not publicly committed to doing so in the future.	2	"Last year, we implemented a process (in alignment with guidance provided by the Organization for Economic Cooperation 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..."	No information available	Reference to last year's implementation of OECD standards coupled with "we expect to take the following additional steps" language in the SEC filing implies the commitment to future implementation of OECD standards.
c) Has the company disseminated its policy on conflict gold to all employees and consultants, including to subsidiaries, involved directly or indirectly in the sourcing and sales of products that contain gold?	1 point	The dissemination must have been more direct than posting to a website, and a brief description on the nature of the dissemination must be provided to the Enough Project.	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."	No information available	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
d) Has the company provided interactive employee training on the policy?	1 point	Training for a relevant subset of employees such as a working group qualifies for credit. A brief description of the nature of the training must be provided to the Enough Project.	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."	No information available	N/A
e) Does the company have a specific conflict gold policy grievance mechanism by which employees, suppliers, or the public can anonymously and/or confidentially report possible violations of the policy?	1 point	To receive full credit for this question, the grievance mechanism must be specific to the conflict gold policy, or there must be a channel within a wider grievance mechanism for conflict gold policy violation reports. A brief description of the process in relation to conflict gold must be provided to the Enough Project.	1	No information given	No information available	"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."	No information available	N/A
Section 2: Engagement with Suppliers	13 Total							

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
a) Has the company disseminated its conflict gold policy to its suppliers (at minimum, 1st-tier suppliers)?	1 point	The policy must have been communicated directly to suppliers. Only posting to a website does not qualify. A brief description of the form of the communication must be provided to the Enough Project.	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."	No information available	N/A
b) Has the company provided or directly supported interactive trainings for one or more of its suppliers on responsible, conflict-free gold sourcing and due diligence aligned with the OECD Guidelines?	2 points	Trainings must be provided by the company or a relevant industry association and must be on the specific topic of responsible minerals sourcing aligned with the OECD Guidelines. The company must have implemented at least one training or supported an industry association training directly financially or in-kind that meets the aforementioned content requirements. Financial contributions to an industry association without a specific link to supplier trainings will not qualify. A brief description of the training and the company's role in delivering or supporting the training must be provided to the Enough Project.	2	No information given	"As part of the Retail Industry Leaders Association Conflict Minerals Program, we developed common approaches for determining the source and chain of custody of 3TG, and worked with Business for Social Responsibility to develop training for our vendors."	"As part of the Retail Industry Leaders Association Conflict Minerals Program, we developed common approaches for determining the source and chain of custody of 3TG, and worked with Business for Social Responsibility to develop training for our vendors. We communicated our sourcing expectations relating to 3TG to vendors through direct communications, information posted on our vendor website, and online training."	No information available	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
c) Has the company publicly committed to source only from audited conflict-free refiners, that is, refiners certified by the Conflict-Free Smelter Program or another OECD-compliant audit program consistent with the CFSP?	3 points	The commitment must be public, and it must require suppliers to source from only refiners certified by the CFSP or another OECD-compliant audit program consistent with the CFSP. Points are not given solely for inquiries as to whether or not suppliers or smelters are certified.	0	No information given	No information available	No information available	No information available	According to the company website, "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." However, to receive credit, the company must make a commitment, not just expect suppliers to use certified smelters, and the commitment must be to source only from refiners that are certified by one or more OECD-compliant audit programs consistent with the CFSP.
d) Has the company made public the number of known refiners in its supply chain?	1.5 points	The public source containing the number must be made available to the Enough Project. No credit is given to companies that only publish the number of known suppliers, but publishing the number of known suppliers and refiners together is sufficient for credit.	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."	No information available	N/A
e) Has the company made public the names of known refiners in its supply chain?	1.5 points	The public source containing the names must be made available to the Enough Project. If the list contains the names of known refiners and suppliers, the refiners must be designated as such to receive credit.	0	No information given	No information available	No information available	No information available	N/A
f) Has the company held a meeting or meetings with its supplier or suppliers to develop strategies for sourcing conflict-free gold from the Great Lakes region of Africa or Congo (at minimum, at least one meeting with at least one supplier)?	4 points: 1 for Great Lakes region, 3 for Congo	The meeting or meetings must specifically include discussion of sourcing conflict-free gold from the Great Lakes region of Africa or Congo. The Great Lakes region of Africa refers to Congo or any of the nine adjoining countries. A brief description of the discussion must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A
Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region	7 Total							
a) Is the company a member of the Public Private Alliance for Responsible Minerals Trade (PPA)?	3 points	The PPA must be able to verify membership.	0	No information given	No information available	No information available	Is not a member of the PPA, as verified by the PPA	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 point for 1 forum, 2 points for multiple forums	Companies must be able to provide verification of attendance upon request.	0	No information given	No information available	No information available	No information available	N/A
c) Is the company a member of the Responsible Jewellery Council (RJC) or the Initiative for Responsible Mining Assurance (IRMA)?	1 point	RJC or IRMA must be able to verify membership.	0	No information given	No information available	No information available	No information available	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
d) Does the company participate in the monthly multi-stakeholder group (MSG) calls organized by the Responsible Sourcing Network (RSN)?	1 point: 1/2 point for participation 1-2 times; an additional 1/2 point for participation more than 2 times	The RSN must be able to verify participation.	0	No information given	No information available	No information available	Does not participate in MSG calls, as verified by the Responsible Sourcing Network (call host)	N/A
Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region	30 Total							
a) Is the company actively encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo, for example, the Solutions for Hope Gold process, organized by Resolve, or an analogous initiative?	9 points: 2 points for making a public statement; 2 points for making an open call; 2 points for attending a past meeting; 3 points for attending a meeting after September 15, 2014 and before the publication of the Leaderboard	Companies will get credit for "encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo" if they do or have done one or several of the following: make a public statement (written or verbal) encouraging the development of conflict-free gold sourcing initiatives; make a public open call to other companies, suppliers, and non-governmental organizations to encourage the development of conflict-free gold sourcing initiatives in Congo; attend a multi-stakeholder meeting (past or future) specifically toward the development of conflict-free gold sourcing initiatives in Congo (e.g. an OECD forum session specifically on this topic, Solutions for Hope Gold meeting). A verifiable description of the action taken must be provided to the Enough Project.	0	No information given	No information available	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 of the nine adjoining countries)?	6 points: 4 points for sourcing from the Great Lakes region, 2 additional points for sourcing specifically from Congo	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	0	No information given	No information available	No information available	No information available	N/A
c) Is the company sourcing verifiably conflict-free gold specifically from the Kivu provinces of Congo?	11 points	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	0	No information given	No information available	No information available	No information available	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
d) Does the company or company foundation support sustainable, 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	Companies must provide an overview of the project(s), as well as lists of the major stakeholders and beneficiaries, the implementing organization(s), geographic location and scope, project timeline, and amount contributed. The project(s) must adhere to or not be in contradiction to the following standards: OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Appendix: Suggested measures to create economic and development opportunities for artisanal and small-scale miners; Voluntary Principles for Security and Human Rights; Equator Principles; UN Principles for Responsible Investment; and recommendations in "Doing Good, while Doing Well: Is there a Win-Win Formula for Responsibly Investing in Congo's Minerals Sector?" Enough Project, July 2014.	0	No information given	No information available	No information available	No information available	N/A
TOTAL	57		11.5					

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
Section 1: Company Policy	7 Total							
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 point for making the policy publicly available; an additional 1 point for making the policy easily accessible	The policy must explicitly mention conflict, conflict minerals, or require company adherence to industry association standards that explicitly mention conflict or conflict minerals. "Easily accessible" is defined as posted to the company's website or the Securities and Exchange Commission (SEC) website.	2	"Yes, we have a conflict minerals policy, and we refer to the policy in our Conflict Minerals Report."	"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." (pg 27 of CSR report)	No information available	No information available	N/A
b) Has the company demonstrably 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 (OECD Guidelines)?	2 points	Full credit (2 points) is given to companies that have made a forward-looking commitment. Half credit (1 point) is given to companies that have used, implemented, or complied with such guidelines, but have not publicly committed to doing so in the future.	2	"Yes, as stated in our SEC filing, and we intend to continue to incorporate OECD guidelines in policy and practice in the future."	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...In the coming year, the Company expects to take the following steps, among others, to refine and improve its due diligence measures and to further mitigate the risk that the Conflict Minerals utilized by the Company in its direct or indirect manufacturing processes may directly or indirectly finance armed groups in the Covered Countries...."	No information available	N/A
c) Has the company disseminated its policy on conflict gold to all employees and consultants, including to subsidiaries, involved directly or indirectly in the sourcing and sales of products that contain gold?	1 point	The dissemination must have been more direct than posting to a website, and a brief description on the nature of the dissemination must be provided to the Enough Project.	1	"The policy has gone out to all our vendors and employees - emailed, or in hard-copy, depending on the vendor. Tiffany always confirms receipt."	No information available	No information available	No information available	N/A
d) Has the company provided interactive employee training on the policy?	1 point	Training for a relevant subset of employees such as a working group qualifies for credit. A brief description of the nature of the training must be provided to the Enough Project.	0	"Tiffany is in the process of developing a training module for employees. It has not been released yet or implemented."	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."	No information available	Credit requires implementation of trainings.

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
e) Does the company have a specific conflict gold policy grievance mechanism by which employees, suppliers, or the public can anonymously and/or confidentially report possible violations of the policy?	1 point	To receive full credit for this question, the grievance mechanism must be specific to the conflict gold policy, or there must be a channel within a wider grievance mechanism for conflict gold policy violation reports. A brief description of the process in relation to conflict gold must be provided to the Enough Project.	1	"Yes, we have a grievance mechanism for conflict minerals-related grievances, as stated in our Conflict Minerals Report for the SEC; the mechanism is built into the Tiffany alert line and can be logged. Submitters have the option of web-based submissions, email, or phone, and in variety of languages. There is also a special local phone for the global vendor compliance department - the intent there is to give vendors a chance to ask questions. All of these mechanisms allow for anonymous or confidential reporting and inquiries."	"This policy also includes a mechanism for vendors, employees and others to report concerns regarding potential policy violations." (pg 27 of CSR report)	"The Company's Conflict Minerals policy also includes a grievance mechanism that provides a means for parties to report concerns about Conflict Minerals sourcing matters."	No information available	N/A
Section 2: Engagement with Suppliers	13 Total							
a) Has the company disseminated its conflict gold policy to its suppliers (at minimum, 1st-tier suppliers)?	1 point	The policy must have been communicated directly to suppliers. Only posting to a website does not qualify. A brief description of the form of the communication must be provided to the Enough Project.	1	"The policy has gone out to all our vendors and employees - direct letters, emailed, or in hard-copy, depending on vendor, in addition to dissemination to the Board of Directors. Tiffany always confirms receipt. We've had a long-term stable relationship with our vendors and that helps them and us follow through."	"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." (pg 27 of CSR report)	"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."	No information available	N/A
b) Has the company provided or directly supported interactive trainings for one or more of its suppliers on responsible, conflict-free gold sourcing and due diligence aligned with the OECD Guidelines?	2 points	Trainings must be provided by the company or a relevant industry association and must be on the specific topic of responsible minerals sourcing aligned with the OECD Guidelines. The company must have implemented at least one training or supported an industry association training directly financially or in-kind that meets the aforementioned content requirements. Financial contributions to an industry association without a specific link to supplier trainings will not qualify. A brief description of the training and the company's role in delivering or supporting the training must be provided to the Enough Project.	0	"We have a supplier training program in development, but it is not yet implemented."	No information available	"The Company generally manages risk in its supply chain by maintaining active and structured relationships with its vendors, through the use of measures that include vendor contracts, vendor questionnaires, the Company's Vendor Manual, which is an educational and training tool and mandate for vendors... Certain members of the Working Group also conducted independent research on Conflict Minerals sourcing and participated in training programs and forums conducted by third-party advisors and consultants."	No information available	Credit requires implementation of trainings.

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
c) Has the company publicly committed to source only from audited conflict-free refiners, that is, refiners certified by the Conflict-Free Smelter Program or another OECD-compliant audit program consistent with the CFSP?	3 points	The commitment must be public, and it must require suppliers to source from only refiners certified by the CFSP or another OECD-compliant audit program consistent with the CFSP. Points are not given solely for inquiries as to whether or not suppliers or smelters are certified.	3	"Yes, we have committed to source only from conflict-free smelters, as stated in our Conflict Minerals Report for the SEC."	"This policy sets forth the Company's expectations that its applicable vendors...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." (pg 27 of CSR report)	"Such smelters and refiners would include those that (a) received a 'DRC Conflict Free' designation from the Conflict-Free Smelter Program of the Conflict-Free Sourcing Initiative; (b) are included on the 'Good Delivery' list of the London Bullion Market Association; and/or (c) are certified pursuant to the Responsible Jewellery Council's Chain-of-Custody Standard. In this Conflict Minerals Report, the term 'Three Conflict-Free Smelter Programs' is used to refer collectively to the program, list and standard described in the preceding sentence. "	No information available	N/A
d) Has the company made public the number of known refiners in its supply chain?	1.5 points	The public source containing the number must be made available to the Enough Project. No credit is given to companies that only publish the number of known suppliers, but publishing the number of known suppliers and refiners together is sufficient for credit.	1.5	No information given	No information available	Number of refiners provided in chart in Conflict Minerals Report (see chart in SEC filing).	No information available	N/A
e) Has the company made public the names of known refiners in its supply chain?	1.5 points	The public source containing the names must be made available to the Enough Project. If the list contains the names of known refiners and suppliers, the refiners must be designated as such to receive credit.	1.5	No information given	No information available	Names of refiners provided in chart in Conflict Minerals Report (see chart in SEC filing).	No information available	N/A
f) Has the company held a meeting or meetings with its supplier or suppliers to develop strategies for sourcing conflict-free gold from the Great Lakes region of Africa or Congo (at minimum, at least one meeting with at least one supplier)?	4 points: 1 for Great Lakes region, 3 for Congo	The meeting or meetings must specifically include discussion of sourcing conflict-free gold from the Great Lakes region of Africa or Congo. The Great Lakes region of Africa refers to Congo or any of the nine adjoining countries. A brief description of the discussion must be provided to the Enough Project.	0	"No."	No information available	No information available	No information available	N/A
Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region	7 Total							
a) Is the company a member of the Public Private Alliance for Responsible Minerals Trade (PPA)?	3 points	The PPA must be able to verify membership.	0	"We have submitted an application for membership and are in the midst of the process. We are waiting for the response."	No information available	No information available	Application has been submitted and is pending PPA review and approval, as verified by the PPA.	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 point for 1 forum, 2 points for multiple forums	Companies must be able to provide verification of attendance upon request.	2	"Yes, multiple forums."	No information available	No information available	No information available	N/A
c) Is the company a member of the Responsible Jewellery Council (RJC) or the Initiative for Responsible Mining Assurance (IRMA)?	1 point	RJC or IRMA must be able to verify membership.	1	"Yes to both IRMA and RJC."	No information available	No information available	Listed as a member of IRMA and RJC	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
d) Does the company participate in the monthly multi-stakeholder group (MSG) calls organized by the Responsible Sourcing Network (RSN)?	1 point: 1/2 point for participation 1-2 times; an additional 1/2 point for participation more than 2 times	The RSN must be able to verify participation.	0	"No."	No information available	No information available	Does not participate in MSG calls, as verified by the Responsible Sourcing Network (call host)	N/A
Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region	30 Total							
a) Is the company actively encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo, for example, the Solutions for Hope Gold process, organized by Resolve, or an analogous initiative?	9 points: 2 points for making a public statement; 2 points for making an open call; 2 points for attending a past meeting; 3 points for attending a meeting after September 15, 2014 and before the publication of the Leaderboard	Companies will get credit for "encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo" if they do or have done one or several of the following: make a public statement (written or verbal) encouraging the development of conflict-free gold sourcing initiatives; make a public open call to other companies, suppliers, and non-governmental organizations to encourage the development of conflict-free gold sourcing initiatives in Congo; attend a multi-stakeholder meeting (past or future) specifically toward the development of conflict-free gold sourcing initiatives in Congo (e.g. an OECD forum session specifically on this topic, Solutions for Hope Gold meeting). A verifiable description of the action taken must be provided to the Enough Project.	2	"We're involved with Solutions for Hope and have been in dialogues with Resolve's President Steve D'Esposito. We're committed to participating in the developments with Solutions for Hope Gold. We attended the first meeting."	No information available	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 of the nine adjoining countries)?	6 points: 4 points for sourcing from the Great Lakes region, 2 additional points for sourcing specifically from Congo	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	0	"No, but our company policy does not prohibit it."	No information available	No information available	No information available	N/A
c) Is the company sourcing verifiably conflict-free gold specifically from the Kivu provinces of Congo?	11 points	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	0	"No, but our company policy does not prohibit it."	No information available	No information available	No information available	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
d) Does the company or company foundation support sustainable, 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	Companies must provide an overview of the project(s), as well as lists of the major stakeholders and beneficiaries, the implementing organization(s), geographic location and scope, project timeline, and amount contributed. The project(s) must adhere to or not be in contradiction to the following standards: OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Appendix: Suggested measures to create economic and development opportunities for artisanal and small-scale miners; Voluntary Principles for Security and Human Rights; Equator Principles; UN Principles for Responsible Investment; and recommendations in "Doing Good, while Doing Well: Is there a Win-Win Formula for Responsibly Investing in Congo's Minerals Sector?" Enough Project, July 2014.	4	<p>"A grant of over \$50,000 will be awarded to the Diamond Development Initiative (DDI) for a multi-stakeholder project supporting artisanal minerals miners and mining affected communities in three of Congo's eastern provinces. Purpose:</p> <p>Register miners in South Kivu, Maniema, and Orientale, build capacity among miners (negotiation, conflict resolution, health and safety), and monitor the fulfillment of community and individual rights.</p> <p>International Partners: PROMINES (World Bank) Resolve</p> <p>Local partners: CRONGD - Orientale network of local NGOs for capacity building, community development and education CRONGD - Maniema ACADHOSHA - South Kivu, promotes human rights, environmental justice, to improve working and living conditions</p> <p>Beneficiaries: foundation grant is to DDI, which is working with local communities and local gold miners, business planning, mediation, conflict resolution - all part of formalization efforts in the area</p> <p>Geographic scope: South Kivu, Orientale, Maniema</p> <p>Timeline: 20 month project, 2 distinct phases - registration, second is 16 months or so - registration and organizational capacity building."</p>	No information available	No information available	No information available	N/A
TOTAL	57		22					

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
Section 1: Company Policy	7 Total							
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 point for making the policy publicly available; an additional 1 point for making the policy easily accessible	The policy must explicitly mention conflict, conflict minerals, or require company adherence to industry association standards that explicitly mention conflict or conflict minerals. "Easily accessible" is defined as posted to the company's website or the Securities and Exchange Commission (SEC) website.	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...."		N/A
b) Has the company demonstrably 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 (OECD Guidelines)?	2 points	Full credit (2 points) is given to companies that have made a forward-looking commitment. Half credit (1 point) is given to companies that have used, implemented, or complied with such guidelines, but have not publicly committed to doing so in the future.	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 the reporting requirements under Dodd-Frank Section 1502 by May 31, 2014."	"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	No information available	Half credit is awarded because, while the company used such guidelines in designing its supply chain policies and procedures, there is no statement of intention to commit to implement them in the future.
c) Has the company disseminated its policy on conflict gold to all employees and consultants, including to subsidiaries, involved directly or indirectly in the sourcing and sales of products that contain gold?	1 point	The dissemination must have been more direct than posting to a website, and a brief description on the nature of the dissemination must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A
d) Has the company provided interactive employee training on the policy?	1 point	Training for a relevant subset of employees such as a working group qualifies for credit. A brief description of the nature of the training must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A
e) Does the company have a specific conflict gold policy grievance mechanism by which employees, suppliers, or the public can anonymously and/or confidentially report possible violations of the policy?	1 point	To receive full credit for this question, the grievance mechanism must be specific to the conflict gold policy, or there must be a channel within a wider grievance mechanism for conflict gold policy violation reports. A brief description of the process in relation to conflict gold must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A
Section 2: Engagement with Suppliers	13 Total							

Wal-Mart Stores, Inc.

[Walmart Conflict Minerals Policy](#)

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	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
a) Has the company disseminated its conflict gold policy to its suppliers (at minimum, 1st-tier suppliers)?	1 point	The policy must have been communicated directly to suppliers. Only posting to a website does not qualify. A brief description of the form of the communication must be provided to the Enough Project.	0	No information given	No information available	"The expectations of the Company under its Conflict Minerals Policy were communicated to the Suppliers."	No information available	In order to receive credit for this category, companies were required to specify by what means they disseminated their conflict gold policy to their suppliers. Enough communicated this to Wal-Mart and all other companies. Although Walmart stated that its conflict gold policy was communicated to suppliers, Walmart, in its communications with Enough, did not respond or clarify by what means their policy was communicated to suppliers.
b) Has the company provided or directly supported interactive trainings for one or more of its suppliers on responsible, conflict-free gold sourcing and due diligence aligned with the OECD Guidelines?	2 points	Trainings must be provided by the company or a relevant industry association and must be on the specific topic of responsible minerals sourcing aligned with the OECD Guidelines. The company must have implemented at least one training or supported an industry association training directly financially or in-kind that meets the aforementioned content requirements. Financial contributions to an industry association without a specific link to supplier trainings will not qualify. A brief description of the training and the company's role in delivering or supporting the training must be provided to the Enough Project.	2	No information given	No information available	"Wal Mart... provided the Suppliers with access to the Retail Industry Leaders Association's Conflict Minerals awareness training; delivered live or recorded training to the Suppliers on the Company's Compliance Portal regarding the use of the Company's Conflict Minerals survey tool, which is based on the Conflict-Free Sourcing Initiative's Conflict Minerals Reporting Template and is designed to elicit representations and certifications from the Suppliers to provide the Company with reasonable assurance as to country of origin and source of, in the case of the Products, the Necessary Tantalum and Necessary Gold (the 'Conflict Minerals Survey'). (c) delivered live or recorded training to the Suppliers on the Company's Compliance Portal regarding the use of the Company's Conflict Minerals survey tool, which is based on the Conflict-Free Sourcing Initiative's Conflict Minerals Reporting Template and is designed to elicit representations and certifications from the Suppliers to provide the Company with reasonable assurance as to country of origin and source of, in the case of the Products, the Necessary Tantalum and Necessary Gold (the 'Conflict Minerals Survey')."	No information available	N/A

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
c) Has the company publicly committed to source only from audited conflict-free refiners, that is, refiners certified by the Conflict-Free Smelter Program or another OECD-compliant audit program consistent with the CFSP?	3 points	The commitment must be public, and it must require suppliers to source from only refiners certified by the CFSP or another OECD-compliant audit program consistent with the CFSP. Points are not given solely for inquiries as to whether or not suppliers or smelters are certified.	0	"We should be awarded additional points for [this] survey question [...] 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	No information available	While Wal-Mart "expects" their supply chains to be proven conflict-free, the question requires a commitment to source only from conflict-free refiners certified by an independent OECD-compliant program.
d) Has the company made public the number of known refiners in its supply chain?	1.5 points	The public source containing the number must be made available to the Enough Project. No credit is given to companies that only publish the number of known suppliers, but publishing the number of known suppliers and refiners together is sufficient for credit.	0	No information given	No information available	No information available	No information available	N/A
e) Has the company made public the names of known refiners in its supply chain?	1.5 points	The public source containing the names must be made available to the Enough Project. If the list contains the names of known refiners and suppliers, the refiners must be designated as such to receive credit.	0	No information given	No information available	No information available	No information available	N/A
f) Has the company held a meeting or meetings with its supplier or suppliers to develop strategies for sourcing conflict-free gold from the Great Lakes region of Africa or Congo (at minimum, at least one meeting with at least one supplier)?	4 points: 1 for Great Lakes region, 3 for Congo	The meeting or meetings must specifically include discussion of sourcing conflict-free gold from the Great Lakes region of Africa or Congo. The Great Lakes region of Africa refers to Congo or any of the nine adjoining countries. A brief description of the discussion must be provided to the Enough Project.	0	No information given	No information available	No information available	No information available	N/A
Section 3: Participation in Initiatives to Help Build a Clean Gold Trade in Congo and the Great Lakes Region	7 Total							
a) Is the company a member of the Public Private Alliance for Responsible Minerals Trade (PPA)?	3 points	The PPA must be able to verify membership.	0	No information given	No information available	No information available	Is not a member of the PPA, as verified by the PPA	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 point for 1 forum, 2 points for multiple forums	Companies must be able to provide verification of attendance upon request.	0	No information given	No information available	No information available	No information available	N/A
c) Is the company a member of the Responsible Jewellery Council (RJC) or the Initiative for Responsible Mining Assurance (IRMA)?	1 point	RJC or IRMA must be able to verify membership.	0	No information given	No information available	No information available	No information available	N/A
d) Does the company participate in the monthly multi-stakeholder group (MSG) calls organized by the Responsible Sourcing Network (RSN)?	1 point: 1/2 point for participation 1-2 times; an additional 1/2 point for participation more than 2 times	The RSN must be able to verify participation.	0	No information given	No information available	No information available	Does not participate in MSG calls, as verified by the Responsible Sourcing Network (call host)	N/A
Section 4: Commitment to Building a Clean Gold Supply Chain in Congo and the Great Lakes Region	30 Total							

	Possible Pts	Scoring Guide	Pts	Company Response	Company Website	SEC Filings	Other (Observation, Industry Websites, etc.)	Explanation
a) Is the company actively encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo, for example, the Solutions for Hope Gold process, organized by Resolve, or an analogous initiative?	9 points: 2 points for making a public statement; 2 points for making an open call; 2 points for attending a past meeting; 3 points for attending a meeting after September 15, 2014 and before the publication of the Leaderboard	Companies will get credit for "encouraging the development of and/or participating in initiatives to enable conflict-free gold sourcing from Congo" if they do or have done one or several of the following: make a public statement (written or verbal) encouraging the development of conflict-free gold sourcing initiatives; make a public open call to other companies, suppliers, and non-governmental organizations to encourage the development of conflict-free gold sourcing initiatives in Congo; attend a multi-stakeholder meeting (past or future) specifically toward the development of conflict-free gold sourcing initiatives in Congo (e.g. an OECD forum session specifically on this topic, Solutions for Hope Gold meeting). A verifiable description of the action taken must be provided to the Enough Project.	0	No information given	No information available	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 of the nine adjoining countries)?	6 points: 4 points for sourcing from the Great Lakes region, 2 additional points for sourcing specifically from Congo	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	0	No information given	No information available	No information available	No information available	N/A
c) Is the company sourcing verifiably conflict-free gold specifically from the Kivu provinces of Congo?	11 points	"Verifiably conflict-free gold" is gold that originates from a "green mine" as validated under the International Conference on the Great Lakes Region (ICGLR) certification process and then is certified as conflict-free by ICGLR chain of custody process. Verifiably conflict-free gold from large scale, small scale or artisanal mining operations all qualify.	0	No information given	No information available	No information available	No information available	N/A

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d) Does the company or company foundation support sustainable, 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	Companies must provide an overview of the project(s), as well as lists of the major stakeholders and beneficiaries, the implementing organization(s), geographic location and scope, project timeline, and amount contributed. The project(s) must adhere to or not be in contradiction to the following standards: OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Appendix: Suggested measures to create economic and development opportunities for artisanal and small-scale miners; Voluntary Principles for Security and Human Rights; Equator Principles; UN Principles for Responsible Investment; and recommendations in "Doing Good, while Doing Well: Is there a Win-Win Formula for Responsibly Investing in Congo's Minerals Sector?" Enough Project, July 2014.	0	No information given	No information available	No information available	No information available	N/A
TOTAL	57		5					