

Overview

Company Name	Tracing	Auditing	Certification	Stakeholder Engagement	Support for Legislation	Total Points	Overall score %
Intel	7	13	7	2	0	29	60%
HP	4	10	8	2	2	26	54%
Phillips	6	8	7	2	0	23	48%
Sandisk	7	10	5	1	0	23	48%
AMD	2	7	7	2	3	21	44%
RIM	4	7	7	2	0	20	42%
Acer	5	8	3	1	2	19	40%
Dell	2	8	5	2	2	19	40%
Apple	6	8	2	2	0	18	38%
Microsoft	2	7	3	2	4	18	38%
Motorola Mobility	2	7	6	1	1	17	35%
Nokia	2	7	6	2	0	17	35%
Panasonic	5	2	5	2	2	16	33%
IBM	3	7	2	1	0	13	27%
LG	4	7	1	1	0	13	27%
Samsung	4	7	1	1	0	13	27%
Sony	2	7	3	1	0	13	27%
Toshiba	2	4	3	1	0	10	21%
Lenovo	0	7	1	0	0	8	17%
Canon	1	2	0	1	0	4	8%
Nikon	1	2	0	1	0	4	8%
Sharp	2	2	0	0	0	4	8%
HTC	0	2	0	0	0	2	4%
Nintendo	0	0	0	0	0	0	0%

3TG = Tantalum, Tin, Tungsten, Gold

Scores based on company submissions in conjunction with publically available information; 48 pts max for scorecard.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
Section 1: Trace (10 pts max score)				
a) Has the company investigated and come to know precisely which companies refine/smelt the company's supply of 3TG, with third-party verification?	0.5 pts for each metal investigated, 0.5 pts for each metal verified, max 4 pts.	2	"Yes, following completion of its second supply chain transparency investigation (now using the EICC Due Diligence Template), Acer has established an initial list of the smelters in its supply chain for tantalum, tin, tungsten, and gold. EICC-GeSI Working group is now conducting the verification."	Acer contacted all 1st tier suppliers regarding their smelters, approximately 100 companies, and heard back from 90%. The information is being verified by the EICC-GeSI working group. Two points for the investigation. Enough looks forward to the company's third-party verification of the smelters.
b) Has the company published the refiners it uses for 3TG?	1 pt for each metal published, max 4 pts.	2	"Yes."	Yes. Over 400 smelters are listed. They are not named, however. http://www.acer-group.com/public/Sustainability/supply/supply-3.htm
c) Has the company visited at least two of its refiners and inquired about the use of conflict minerals within the past year?	Yes = 2 pts, No = 0 pts	1	"Acer began participating with a small group of EICC member companies to conduct pre-audit visits for the Conflict-Free Smelter (CFS) audit and validation program. The goal is to introduce these smelters to the program and to secure their participation. To date, Acer has visited one smelter. However, Acer plans to visit 3-5 smelters in 2012."	Acer has visited 1 smelter so far and hope to visit other smelters, together with other companies. Because Acer is close to many Asian smelters, Enough would encourage the company to visit and educate smelters.
Section 2: Audit (22 pts max score)				
a) Does the company have a stated policy of auditing suppliers of 3TG metals?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	5	"Yes, Acer has developed a Policy on the Responsible Sourcing of Minerals that states this position. Acer's policy states support and participation on both the CFS audit and validation program and the EICC Validated Audit Process (VAP) with a continued support to evolve these programs to improve their efficacy. The updated policy will be published by the end of March 2012." UPDATE: http://www.acer-group.com/public/Sustainability/sustainability_main04-10.htm	Yes. The company will use the EICC Code of Conduct to audit its suppliers, which will include provisions on conflict minerals. This is a welcome step. One bonus point was also awarded, because the company has a policy that once CFS program smelter lists are sufficiently available, Acer suppliers must only accept metals from smelters that have been audited and are deemed compliant by the EICC/GeSI Conflict-free Smelter (CFS) Program. They are examining how to enforce this, looking at tantalum now. The company should clarify "complete" and should begin enforcing this policy on tantalum through audits, where it appears that there are a sufficient number of compliant smelters available. Enough would welcome such an audit program.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
b) Has the company conducted internal audits of the procurement practices of 3TG suppliers down to the level of refiner, at least, within the last year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"Yes, in 2011 Acer began requesting that its suppliers provide information on their minerals sourcing policies, procedures, due diligence processes and to also identify those smelters in their supply chain that supply tantalum, tin, tungsten or gold to support the manufacture of Acer products. This is currently accomplished via the EICC/GeSI Due Diligence Template."	The audits of first tier suppliers incorporating conflict minerals have not yet begun.
c) Has the company had third-party audits conducted of 3TG suppliers down to the level of refiner, at least, within the past year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"Acer utilizes the EICC VAP to conduct third-party audits of its suppliers. As a member of the EICC Extractives Working Group, Acer will provide input into the further development of the VAP to develop key questions essential to the verification of processes and data provided by suppliers/smelters as part of the EICC due diligence process."	The audits of first tier suppliers incorporating conflict minerals have not yet begun.
d) Has the company participated in the Extractives Work Group for the EICC-GeSI conflict-free smelter program (CFS)?	Yes = 2 pts, No = 0 pts	2	"Yes, Acer is a member of the CFS audit and validation program workgroup and is now participating on a subgroup comprised of a few EICC members that is reviewing the list of smelters that are received by EICC members. The goal is to identify true smelters through investigation and to introduce those smelters to the CFS program and gain their support."	Yes
e) Has the company provided financial support for auditing for 3TG?	Yes = 4 pts for support >\$100K, 2 pts for support >\$50K, 1 pt for support <\$50K.	1	"Yes, as a member of the EICC, Acer financially supports the EICC CFS audit and verification program, as well as the EICC VAP. A portion of Acer's EICC membership dues goes to this contribution. "	One point was given for EICC Working Group contribution, which funds the overall CFS program. Additional points would be given here for participation in the CFS Early Adopters Program, to incentivize smelters to participate in the audits http://solutions-network.org/site-cfs/ We would welcome the company's participation in the project. ITRI is an industry bag-and-tag system that is not auditing. PPA contributions are covered under Question 3.
f) Has the company developed at least one verifiably conflict-free product, with independently audited supply chains all the way to the point of extraction?	Yes = 4 pts, No = 0 pts.	0	"No, due to uncertainties in current conflict-free status of many suppliers, it is likely not possible for any industry member to claim status."	Not to our knowledge. Enough would welcome this step, along the line of Intel's commitment to making a fully conflict-free chip in 2013.
Section 3: Certify (8 pts max score)				

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
a) Does the company have a stated policy of support for certification?	Yes = 2 pts, No = 0 pts	1	"Yes, same as above." UPDATE: http://www.acer-group.com/public/Sustainability/sustainability_main04-10.htm	Enough welcomes the company's statement on certification. One point was awarded instead of two, however, because the support for certification is given in the conditional tense as a 'maybe' and 'if it is decided by multiple stakeholders', rather than pro-active support, i.e. the company supports a certification process. We would welcome Acer's proactive support for a certification process.
b) Has the company made public statements in support of certification?	Yes = 2 pts, No = 0 pts	1	"Yes, Acer has developed a Policy on the Responsible Sourcing of Minerals that states this position. Acer's policy will be published by the end of March 2012. Acer will support the development of a certification program if it is decided by multiple stakeholders, including Industry that it is attainable and is the most effective solution. Until that time, Acer will continue to support the audit and verification process set up by the EICC/GeSI." UPDATE: http://www.acer-group.com/public/Sustainability/sustainability_main04-10.htm	See 3a
c) Has the company provided financial support for certification? Participation in the Public Private Alliance (PPA) would count for points: PPA is a step toward certification but not certification, as per the definition: certification as a multi-stakeholder process similar to the Kimberley and/or Forest Stewardship Council processes, which would be an international regime to trace, audit, and certify 3TG metals as being conflict-free.	Yes = 2 pts for support > \$500K, 1.5 pts for support >\$200K, 1 pt for support <\$200K, No = 0 pts	1	"Yes, as a member of the EICC, Acer supported the industry group contribution of to the PPA. A portion of Acer's EICC membership dues goes to this contribution. "	Acer applied to be a PPA member in June 2012. If accepted, the minimum company contribution is \$25,000. Together with the company's EICC contribution that helps fund the PPA, this would still add up to one point.
d) Has the company participated in the process for developing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and did it commit to piloting the guidance?	Yes = 2 pts, No = 0 pts	0	"Yes, Acer is a member of the EICC and the Extractives Working Group. The group has helped shape the OECD due diligence guidelines and has provided feedback on the pilot of the guidance."	The company informed Enough that it was likely to agree to pilot the OECD guidance, but had not yet done so as of the time of writing. Enough would welcome Acer's participation in the pilot.
Section 4: Stakeholder Engagement (2 pts max score)				

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
a) Did the company meet with the NGO coalition regarding inquiries on conflict minerals?	Yes = 1 pt, No = 0 pt	1	"Yes, Acer conducted a conference call with Enough in 2010 to discuss its Conflict Minerals activities and to get a greater understanding of additional efforts on which it could focus. In addition, Acer has attended at least one EICC/GeSI Extractives Workshop per year since 2009. Enough and other NGOs have been in attendance to provide valuable information regarding on-the-ground activities and where support and participation is recommended."	Yes.
b) Has the company held regular communication with NGO coalition regarding conflict minerals (at least bi-monthly)?	Yes = 1 pt, No = 0 pt	0	"No, Acer has not met the bi-monthly communication frequency. However, we are willing to discuss opportunities for increased frequency."	No. Acer is not a regular participant in the monthly multi-stakeholder calls on conflict minerals, is not part of the PPA, was not part of the Multi-stakeholder group on the SEC, and did not participate in the OECD process. Enough would welcome the company's participation in at least some of these important fora for dialogue with civil society.
Section 5: Support for Legislation (6 pts max score)				
a) Did the company participate in the Multi-stakeholder Group of NGOs, companies, and investors to the SEC and sign on to the Group's letters?	Yes = 2 pts, No = 0 pts	0	"Acer is not a public company in the United States. As a result, Acer is not under the jurisdiction of the SEC and does not file reports to the regulatory agency. It is Acer's position that due to its private status, any direct communication or participation with the SEC is not warranted. Regardless of Acer's private status and non-applicable status with respect to the Dodd-Frank Wall Street Reform and Consumer Protection Act (H.R. 4173), Acer supports the intent of the law, and is in the process of implementing a due diligence and reporting process that is in line with the requirements."	The United States is a substantial market for the company, and it therefore has interest in public policy in the U.S. The company's participation in the Multi-stakeholder Group would therefore be welcome, or in individual submissions to the SEC.
b) Did the company issue a statement advocating for legislation in Europe on conflict minerals?	Yes = 2 pts, No = 0 pts	2	"Acer supports the development of legislation elsewhere in the world, including Europe, that is similar to the Dodd-Frank Wall Street Reform and Consumer Protection Act (H.R. 4173) in the US. Acer has developed a Policy on the Responsible Sourcing of Minerals that states this position. The policy will be published by the end of March 2012." UPDATE: http://www.acer-group.com/public/Sustainability/sustainability_main04-10.htm	Good statement from Acer.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
c) Did the company issue a public statement against the threatened lawsuit against the SEC regulations on conflict minerals by the Chamber of Commerce?	Yes = 2 pts, No = 0 pts	0	"Acer is not a public company in the United States. As a result, Acer is not under the jurisdiction of the SEC and does not file reports to the regulatory agency. In addition, Acer is not a member of the United States Chamber of Commerce. As a result, it is Acer's position that it does not have the necessary engagement with these two organizations to communicate with or to attempt to influence the direction, focus, or strategy of these organizations. "	Not to our knowledge. In furtherance of steps on conflict minerals, Enough would welcome a statement against the threatened lawsuit, following statements by Microsoft and GE. IT industry statements on SOPA helped reverse the Chamber's position in 2011.
Scoring	48 points max	19		
Rating %		40%		

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
Section 1: Trace (10 pts max score)				
a) Has the company investigated and come to know precisely which companies refine/smelt the company's supply of 3TG, with third-party verification?	0.5 pts for each metal investigated, 0.5 pts for each metal verified, max 4 pts.	2	"AMD has sent EICC and GeSI Reporting templates to our suppliers, received responses, and we are actively compiling the results. Through this process, which is a pre-implementation pilot, we have identified more than 50 smelters. Our process is to rely on the EICC/GeSI conflict free smelter program for third party verification of the smelters. We have not verified our supplier's responses via third party. Within our own supply chain, AMD has developed processes to identify conflict minerals. We have utilized the standardized EICC processes to trace the minerals back to the smelters of origin and correlated these with the conflict-free smelter program. While mapping our supply chain back to the smelter is complex, we have had some early success and are committed to the process. AMD plans to continue to work with our business partners—both customers and suppliers—to develop a workable and efficient tracking system as the SEC rules are finalized. "	Two points for the investigation, which includes an estimate of the number of smelters. Enough looks forward to the company's third-party verification of the smelters.
b) Has the company published the refiners it uses for 3TG?	1 pt for each metal published, max 4 pts.	0	"No."	Not to our knowledge. Enough would welcome publication of the number and/or name of the smelters in the company's supply chain, as some companies have already done. This would aid transparency in the supply chain at the critical chokepoint in the chain for conflict minerals.
c) Has the company visited at least two of its refiners and inquired about the use of conflict minerals within the past year?	Yes = 2 pts, No = 0 pts	0	"AMD is relying on the EICC/GeSI conflict free smelter process. Please consult EICC/GeSI web page here http://www.conflictreesmelter.org/CFSindicators.htm for the latest number of smelters/refiners."	Enough would welcome the company's visit to smelters, as this would send important messages about the need for all smelters to go through independent audits, for example through the CFS process.
Section 2: Audit (22 pts max score)				

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
a) Does the company have a stated policy of auditing suppliers of 3TG metals?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	4	"Yes. We are working with the EICC to audit 3TG smelters. Supplier audits: Based on the results of the risk assessment, AMD may require a third-party on-site audit of supplier practices and management systems to evaluate supplier compliance with the EICC standards including avoiding human trafficking and slavery in our supply chain and with applicable laws and regulations. These audits may be announced or unannounced depending on the circumstances."	Yes. The company will use the EICC Code to audit its suppliers, which will include conflict minerals in 2012. However, the company does not yet audit its 1st tier or other suppliers with regard to whether they are using CFS compliant smelters. Enough would welcome such an audit program. A requirement for suppliers to use only CFS compliant smelters would be possible now, and enforcement of this policy could begin with tantalum, where a majority of tantalum smelters have been certified.
b) Has the company conducted internal audits of the procurement practices of 3TG suppliers down to the level of refiner, at least, within the last year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"Yes, we used the EICC/GeSI common reporting template tool to assess our suppliers."	The audits of first tier suppliers incorporating conflict minerals have not yet begun.
c) Has the company had third-party audits conducted of 3TG suppliers down to the level of refiner, at least, within the past year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"Yes, we used the EICC/GeSI common reporting template tool to assess our suppliers. Smelters are being audited by third parties under the EICC/GeSI conflict free smelter program."	The audits of first tier suppliers incorporating conflict minerals have not yet begun.
d) Has the company participated in the Extractives Work Group for the EICC-GeSI conflict-free smelter program (CFS)?	Yes = 2 pts, No = 0 pts	2	"Yes."	Yes
e) Has the company provided financial support for auditing for 3TG?	Yes = 4 pts for support >\$100K, 2 pts for support >\$50K, 1 pt for support <\$50K.	1	"Yes."	One point was given for EICC Working Group contribution, which funds the overall CFS program. Additional points would be given here for participation in the CFS Early Adopters Program, to incentivize smelters to participate in the audits http://solutions-network.org/site-cfs/ We would welcome the company's participation in the project. ITRI is an industry bag-and-tag system that is not auditing. PPA contributions are covered under Question 3.
f) Has the company developed at least one verifiably conflict-free product, with independently audited supply chains all the way to the point of extraction?	Yes = 4 pts, No = 0 pts.	0	"No."	Not to our knowledge. Enough would welcome this step, along the line of Intel's commitment to making a fully conflict-free chip in 2013.
Section 3: Certify (8 pts max score)				

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
a) Has the company made public statements in support of certification?	Yes = 2 pts, No = 0 pts	2	"AMD believes that effective implementation of the new law must involve an "in-region" mineral certification system that enables the traceability and certification of minerals mined in the DRC region. "	AMD went above and beyond to meet with USG officials to call for a certification process. "Throughout 2011, AMD met with senior officials in the U.S. State Department, including Undersecretary of State for Economic, Business, and Agricultural Affairs, Robert Hormats; Assistant Secretary of State for African Affairs, Johnny Carson; and the special envoy to the DRC region, Ambassador R. Barrie Walkley. The purpose of these meetings was to provide our input to the U.S. government on appropriate actions needed for responsible minerals trade in the DRC region."
b) Does the company have a stated policy of support for certification?	Yes = 2 pts, No = 0 pts	2	"Yes. AMD supports in-region certify certification schemes as evidenced by our membership in the public private alliance and the following statement on our website: "To support the development of a reliable "in-region" sourcing process , AMD is actively working with stakeholders from civil society, government, and the social investment community. Partnering with the Enough Project, AMD met with senior officials in the U.S. State Department to emphasize the need for government leadership of the "in-region" sourcing process. "In-region" sourcing aims to continue economic development of the region through mineral sales, while eliminating those sales that support armed militias, conflict, and human rights abuses. "	Yes. See 3a.
c) Has the company provided financial support for certification? Participation in the Public Private Alliance (PPA) would count for points: PPA is a step toward certification but not certification, as per the definition: certification as a multi-stakeholder process similar to the Kimberley and/or Forest Stewardship Council processes, which would be an international regime to trace, audit, and certify 3TG metals as being conflict-free.	Yes = 2 pts for support > \$500K, 1.5 pts for support >\$200K, 1 pt for support <\$200K, No = 0 pts	1	"Yes. PPA support."	Yes. Good step by AMD. PPA minimum contribution is \$25,000.
d) Has the company participated in the process for developing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and did it commit to piloting the guidance?	Yes = 2 pts, No = 0 pts	2	"Yes."	AMD is piloting the Guidance - see http://www.oecd.org/dataoecd/17/59/50542591.pdf .

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
Section 4: Stakeholder Engagement (2 pts max score)				
a) Did the company meet with the NGO coalition regarding inquiries on conflict minerals?	Yes = 1 pt, No = 0 pt	1	"Yes."	Yes.
b) Has the company held regular communication with NGO coalition regarding conflict minerals (at least bi-monthly)?	Yes = 1 pt, No = 0 pt	1	"Yes."	Yes.
Section 5: Support for Legislation (6 pts max score)				
a) Did the company participate in the Multi-stakeholder Group of NGOs, companies, and investors to the SEC and sign on to the Group's letters?	Yes = 2 pts, No = 0 pts	3	"Yes."	AMD co-chaired the multi-stakeholder group on the SEC rules with Enough and signed all letters. One bonus point was awarded for co-chairing of the group and for standing up in the face of heavy industry lobbyist pressure to speak about the need for strong regulations at the SEC roundtable.
b) Did the company issue a statement advocating for legislation in Europe on conflict minerals?	Yes = 2 pts, No = 0 pts	0	"No."	Europe is a substantial market for the company, and it therefore has interest in public policy in Europe. The company's public statements for legislation in Europe would therefore make a difference on this important issue and would be welcome.
c) Did the company issue a public statement against the threatened lawsuit against the SEC regulations on conflict minerals by the Chamber of Commerce?	Yes = 2 pts, No = 0 pts	0	"No."	Not to our knowledge. According to OpenSecrets.org, AMD spent \$480,000 on lobbying in 2011. In furtherance of steps on conflict minerals, Enough would welcome a statement against the threatened lawsuit, following statements by Microsoft and GE. IT industry statements on SOPA helped reverse the Chamber's position in 2011.
Scoring		48 points max	21	
Rating %			44%	

Scorecard Criteria	Scoring Allocation	Scores	Company Comments	Justification
Section 1: Trace (10 pts max score)				
a) Has the company investigated and come to know precisely which companies refine/smelt the company's supply of 3TG, with third-party verification?	0.5 pts for each metal investigated, 0.5 pts for each metal verified, max 4 pts.	2	No comments provided.	The company's investigation was proactive. 218 suppliers were queried about the smelters that are in their supply chain, and an exact number of smelters was identified. Two points were awarded for the investigation. Enough looks forward to the company's third-party verification of the smelters.
b) Has the company published the refiners it uses for 3TG?	1 pt for each metal published, max 4 pts.	2	No comments provided.	Apple was the first company to list its number of their smelters - 175, a proactive step. However, it did not list the names. Two points were therefore awarded. Apple also published its main suppliers at http://images.apple.com/supplierresponsibility/pdf/Apple_Supplier_List_2011.pdf . It should be noted that Apple was the first company to publish the list, a full year before any other company had published. Enough would welcome publication of the names of the smelters.
c) Has the company visited at least two of its refiners and inquired about the use of conflict minerals within the past year?	Yes = 2 pts, No = 0 pts	2	"In partnership with fellow EICC and GeSI member companies, we are also working on an outreach program to train management at smelters about the need for conflict-free sourcing of raw materials and in the EICC/GeSI certification process. To date, more than 34 smelters have received onsite training and consultation through this endeavor."	Yes.
Section 2: Audit (22 pts max score)				

Scorecard Criteria	Scoring Allocation	Scores	Company Comments	Justification
a) Does the company have a stated policy of auditing suppliers of 3TG metals?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	5	"We are working with the Electronics Industry Citizenship Coalition (EICC) and the Global e-Sustainability Initiative (GeSI) in an industry-wide effort to train and certify smelters of these metals as being conflict-free through a rigorous independent third-party audit process aligned with the Organisation for Economic Co-operation and Development (OECD) guidelines. These audits include a comprehensive review of business and procurement systems as well as inspection of documentation of raw material purchases and inventory to ensure the absence of conflicted minerals. As the EICC/GeSI initiative completes smelter audits in tantalum, tin, tungsten, and gold, we will require our suppliers to source from these conflict-free certified smelters."	Yes. The company will incorporate conflict minerals into its supplier audits going forward. This is a welcome step. One bonus point was also awarded because of Apple's requirement of its suppliers to use only CFS compliant smelters, which was the industry's first. Apple should clarify "complete" and should begin enforcing this policy on tantalum, where it appears that there are a sufficient number of compliant smelters available. Enough would welcome such an audit program.
b) Has the company conducted internal audits of the procurement practices of 3TG suppliers down to the level of refiner, at least, within the last year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	No comments provided.	The audits of first tier suppliers incorporating conflict minerals have not yet begun.
c) Has the company had third-party audits conducted of 3TG suppliers down to the level of refiner, at least, within the past year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	No comments provided.	The audits of first tier suppliers incorporating conflict minerals have not yet begun.
d) Has the company participated in the Extractives Work Group for the EICC-GeSI conflict-free smelter program (CFS)?	Yes = 2 pts, No = 0 pts	2	No comments provided.	Yes
e) Has the company provided financial support for auditing for 3TG?	Yes = 4 pts for support >\$100K, 2 pts for support >\$50K, 1 pt for support <\$50K.	1	No comments provided.	One point was given for EICC Working Group contribution, which funds the overall CFS program. Additional points would be given here for participation in the CFS Early Adopters Program, to incentivize smelters to participate in the audits http://solutions-network.org/site-cfs/ We would welcome the company's participation in the project. ITRI is an industry bag-and-tag system that is not auditing. PPA contributions are covered under Question 3.
f) Has the company developed at least one verifiably conflict-free product, with independently audited supply chains all the way to the point of extraction?	Yes = 4 pts, No = 0 pts.	0	No comments provided.	Not to our knowledge. Enough would welcome this step, along the line of Intel's commitment to making a fully conflict-free chip in 2013.
Section 3: Certify (8 pts max score)				

Scorecard Criteria	Scoring Allocation	Scores	Company Comments	Justification
a) Has the company made public statements in support of certification?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Not to our knowledge. Enough would welcome such a statement, which would help encourage government and multi-stakeholder action to act more quickly to develop a clean minerals trade in the Great Lakes Region.
b) Does the company have a stated policy of support for certification?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Not to our knowledge.
c) Has the company provided financial support for certification? Participation in the Public Private Alliance (PPA) would count for points; PPA is a step toward certification but not certification, as per the definition: certification as a multi-stakeholder process similar to the Kimberley and/or Forest Stewardship Council processes, which would be an international regime to trace, audit, and certify 3TG metals as being conflict-free.	Yes = 2 pts for support > \$500K, 1.5 pts for support >\$200K, 1 pt for support <\$200K, No = 0 pts	1	No comments provided.	One point was given for the company's contribution to the EICC contribution to the PPA. Apple has also applied to be a PPA member, a welcome and positive step.
d) Has the company participated in the process for developing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and did it commit to piloting the guidance?	Yes = 2 pts, No = 0 pts	1	No comments provided.	Apple participated in the process and is contemplating piloting the Guidance. When it announces piloting of the guidance, Apple will earn points on this question.
Section 4: Stakeholder Engagement (2 pts max score)				
a) Did the company meet with the NGO coalition regarding inquiries on conflict minerals?	Yes = 1 pt, No = 0 pt	1	No comments provided.	Yes.
b) Has the company held regular communication with NGO coalition regarding conflict minerals (at least bi-monthly)?	Yes = 1 pt, No = 0 pt	1	No comments provided.	Yes.
Section 5: Support for Legislation (6 pts max score)				
a) Did the company participate in the Multi-stakeholder Group of NGOs, companies, and investors to the SEC and sign on to the Group's letters?	Yes = 2 pts, No = 0 pts	0	No comments provided.	The United States is a substantial market for the company, and it therefore has interest in public policy in the U.S. The company's participation in the Multi-stakeholder Group would therefore be welcome, or in individual submissions to the SEC.
b) Did the company issue a statement advocating for legislation in Europe on conflict minerals?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Europe is a substantial market for the company, and it therefore has interest in public policy in Europe. The company's public statements for legislation in Europe would therefore make a difference on this important issue and would be welcome.

Scorecard Criteria	Scoring Allocation	Scores	Company Comments	Justification
c) Did the company issue a public statement against the threatened lawsuit against the SEC regulations on conflict minerals by the Chamber of Commerce?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Not to our knowledge. According to OpenSecrets.org, Apple spent \$2,260,000 on lobbying in 2011. In furtherance of steps on conflict minerals, Enough would welcome a statement against the threatened lawsuit, following statements by Microsoft and GE. IT industry statements on SOPA helped reverse the Chamber's position in 2011.
Scoring	48 pts max	18		
Rating %		38%		

Scorecard Criteria	Scoring Allocation	Score	Company comments	Justification
Section 1: Trace (10 pts max score)				
a) Has the company investigated and come to know precisely which companies refine/smelt the company's supply of 3TG, with third-party verification?	0.5 pts for each metal investigated, 0.5 pts for each metal verified, max 4 pts.	1	"Partly yes. Since September 2010, soon after the U.S. Dodd-Frank Act was promulgated in July 2012, our procurement headquarters contacted more than 2,500 suppliers which directly provide parts, units, and materials for Canon products around the world, and tried to confirm if 3TG metals originating from DRC and adjoining countries had been used or not. However, as is the case with other electronics companies, the information provided by suppliers was not sufficient enough to prepare a conflict minerals report required by the U.S. Dodd-Frank Act. We are going to conduct a suppliers' survey again, using the EICC template, after the SEC rules regarding conflict minerals is finalized."	Canon surveyed 2,500 suppliers but did not appear to ask questions regarding the smelters that suppliers were using in the supply chain. One point was given for having contacted suppliers. There is no reason for the company to wait for the SEC rules to come out, as other companies have already conducted supplier surveys well in advance of the release of the rules.
b) Has the company published the refiners it uses for 3TG?	1 pt for each metal published, max 4 pts.	0	"5)In December 2011, JEITA organized a study group for responsible minerals procurement, in which major electronics companies, including Sharp, participate. As an industry-level basic policy, the member companies of the group, including Sharp, have agreed to adopt EICC-GeSI's Conflict Free Smelters Program and tools like their reporting template, and in January this year, JEITA concluded a memorandum of understanding with EICC and GeSI on the utilization of their program, related resources etc. Sharp intends to further advance efforts within this framework."	Not to our knowledge. Enough would welcome publication of the number and/or name of the smelters in the company's supply chain, as some companies have already done. This would aid transparency in the supply chain at the critical chokepoint in the chain for conflict minerals.
c) Has the company visited at least two of its refiners and inquired about the use of conflict minerals within the past year?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Enough would welcome the company's visit to smelters, as this would send important messages about the need for all smelters to go through independent audits, for example through the CFS process.
Section 2: Audit (22 pts max score)				
a) Does the company have a stated policy of auditing suppliers of 3TG metals?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	No comments provided.	Not to our knowledge. It does not appear that conflict minerals are included in Canon's Code of Conduct or its supplier audits.
b) Has the company conducted internal audits of the procurement practices of 3TG suppliers down to the level of refiner, at least, within the last year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	No comments provided.	Not to our knowledge.

Scorecard Criteria	Scoring Allocation	Score	Company comments	Justification
c) Has the company had third-party audits conducted of 3TG suppliers down to the level of refiner, at least, within the past year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	No comments provided.	Not to our knowledge.
d) Has the company participated in the Extractives Work Group for the EICC-GeSI conflict-free smelter program (CFS)?	Yes = 2 pts, No = 0 pts	2	No comments provided.	Canon joined the EICC-GeSI Extractives Group in 2011 through JEITA.
e) Has the company provided financial support for auditing for 3TG?	Yes = 4 pts for support >\$100K, 2 pts for support >\$50K, 1 pt for support <\$50K.	0	No comments provided.	Not to our knowledge.
f) Has the company developed at least one verifiably conflict-free product, with independently audited supply chains all the way to the point of extraction?	Yes = 4 pts, No = 0 pts.	0	No comments provided.	Not to our knowledge. Enough would welcome this step, along the line of Intel's commitment to making a fully conflict-free chip in 2013.
Section 3: Certify (8 pts max score)				
a) Has the company made public statements in support of certification?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Not to our knowledge. Enough would welcome such a statement, which would help encourage government and multi-stakeholder action to act more quickly to develop a clean minerals trade in the Great Lakes Region.
b) Does the company have a stated policy of support for certification?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Not to our knowledge.
c) Has the company provided financial support for certification? Participation in the Public Private Alliance (PPA) would count for points; PPA is a step toward certification but not certification, as per the definition: certification as a multi-stakeholder process similar to the Kimberley and/or Forest Stewardship Council processes, which would be an international regime to trace, audit, and certify 3TG metals as being conflict-free.	Yes = 2 pts for support > \$500K, 1.5 pts for support >\$200K, 1 pt for support <\$200K, No = 0 pts	0	No comments provided.	Not to our knowledge.
d) Has the company participated in the process for developing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and did it commit to piloting the guidance?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Not to our knowledge.
Section 4: Stakeholder Engagement (2 pts max score)				
a) Did the company meet with the NGO coalition regarding inquiries on conflict minerals?	Yes = 1 pt, No = 0 pt	1	No comments provided.	Yes.

Canon

Scorecard Criteria	Scoring Allocation	Score	Company comments	Justification
b) Has the company held regular communication with NGO coalition regarding conflict minerals (at least bi-monthly)?	Yes = 1 pt, No = 0 pt	0	No comments provided.	No. Canon is not a regular participant in the monthly multi-stakeholder calls on conflict minerals, is not part of the PPA, was not part of the Multi-stakeholder group on the SEC, and did not participate in the OECD process. Enough would welcome the company's participation in at least some of these important fora for dialogue with civil society.
Section 5: Support for Legislation (6 pts max score)				
a) Did the company participate in the Multi-stakeholder group of NGOs, companies, and investors to the SEC and sign on to the Group's letters?	Yes = 2 pts, No = 0 pts	0	No comments provided.	The United States is a substantial market for the company, and it therefore has interest in public policy in the U.S. The company's participation in the Multi-stakeholder Group would therefore be welcome, or in individual submissions to the SEC.
b) Did the company issue a statement advocating for legislation in Europe on conflict minerals?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Europe is a substantial market for the company, and it therefore has interest in public policy in Europe. The company's public statements for legislation in Europe would therefore make a difference on this important issue and would be welcome.
c) Did the company issue a public statement against the threatened lawsuit against the SEC regulations on conflict minerals by the Chamber of Commerce?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Not to our knowledge. In furtherance of steps on conflict minerals, Enough would welcome a statement against the threatened lawsuit, following statements by Microsoft and GE. IT industry statements on SOPA helped reverse the Chamber's position in 2011.
Scoring		52 pts max	4	
Rating %			8%	

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
Section 1: Trace (10 pts max score)				
a) Has the company investigated and come to know precisely which companies refine/smelt the company's supply of 3TG, with third-party verification?	0.5 pts for each metal investigated, 0.5 pts for each metal verified, max 4 pts.	0	No comments provided.	Not to our knowledge.
b) Has the company published the refiners it uses for 3TG?	1 pt for each metal published, max 4 pts.	0	No publication.	Not to our knowledge. Enough would welcome publication of the number and/or name of the smelters in the company's supply chain, as some companies have already done. This would aid transparency in the supply chain at the critical chokepoint in the chain for conflict minerals.
c) Has the company visited at least two of its refiners and inquired about the use of conflict minerals within the past year?	Yes = 2 pts, No = 0 pts	2	"We visited more than 2 smelters."	Yes. Good step by Dell.
Section 2: Audit (22 pts max score)				
a) Does the company have a stated policy of auditing suppliers of 3TG metals?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	5	"We have notified all our suppliers of our policy on conflict minerals and have asked each supplier to provide us with a confirmation of their conflict-free status. Dell also works diligently to educate suppliers, investors and customers on this issue through speaking engagements, workshops and stakeholder engagements."	Yes. The company will use the EICC Code to audit its suppliers, which will include conflict minerals in 2012. However, the company does not yet audit its 1st tier or other suppliers with regard to whether they are using CFS compliant smelters. Enough would welcome such an audit program. One extra point was given for Dell's requirement: "Once the CFS program and certification programs have matured to a point that Dell is confident in its ability to deliver conflict-free materials we will begin to require suppliers to use certified sources for procurement in Dell products." Enforcement of this policy through audits could begin now with tantalum, where a majority of tantalum smelters have been certified.
b) Has the company conducted internal audits of the procurement practices of 3TG suppliers down to the level of refiner, at least, within the last year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0		The audits of first tier suppliers incorporating conflict minerals have not yet begun.
c) Has the company had third-party audits conducted of 3TG suppliers down to the level of refiner, at least, within the past year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"No."	The audits of first tier suppliers incorporating conflict minerals have not yet begun.
d) Has the company participated in the Extractives Work Group for the EICC-GeSI conflict-free smelter program (CFS)?	Yes = 2 pts, No = 0 pts	2		Yes, Dell is in the Extractives Group.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
e) Has the company provided financial support for auditing for 3TG?	Yes = 4 pts for support >\$100K, 2 pts for support >\$50K, 1 pt for support <\$50K.	1		One point was given for EICC Working Group contribution, which funds the overall CFS program. Additional points would be given here for participation in the CFS Early Adopters Program, to incentivize smelters to participate in the audits http://solutions-network.org/site-cfs/ We would welcome the company's participation in the project. ITRI is an industry bag-and-tag system that is not auditing. PPA contributions are covered under Question 3.
f) Has the company developed at least one verifiably conflict-free product, with independently audited supply chains all the way to the point of extraction?	Yes = 4 pts, No = 0 pts.	0	"No, but we are looking into a conflict free phone."	Enough would welcome this step, along the line of Intel's commitment to making a fully conflict-free chip in 2013.
Section 3: Certify (8 pts max score)				
a) Has the company made public statements in support of certification?	Yes = 2 pts, No = 0 pts	1	Dell supports "a responsible minerals trade from the Great Lakes region of Central Africa." and "Dell is working toward the goal of responsible sourcing globally, including from the DRC, through a conflict-free supply chain, confirmed by a robust verification system."	This is closely linked to certification but is not exactly the same as the definition of certification as defined in 3c, therefore partial credit was awarded.
b) Does the company have a stated policy of support for certification?	Yes = 2 pts, No = 0 pts	2		See 3a
c) Has the company provided financial support for certification? Participation in the Public Private Alliance (PPA) would count for points; PPA is a step toward certification but not certification, as per the definition: certification as a multi-stakeholder process similar to the Kimberley and/or Forest Stewardship Council processes, which would be an international regime to trace, audit, and certify 3TG metals as being conflict-free.	Yes = 2 pts for support > \$500K, 1.5 pts for support >\$200K, 1 pt for support <\$200K, No = 0 pts	1	Yes	Dell's participation in the PPA and its previous contributions to ITSCI are good steps.
d) Has the company participated in the process for developing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and did it commit to piloting the guidance?	Yes = 2 pts, No = 0 pts	1	No comments provided.	The company participated in the OECD meetings to develop the Guidance but has not yet agreed to pilot the Guidance. Enough would welcome the company's piloting of the Guidance and publication of its due diligence.
Section 4: Stakeholder Engagement (2 pts max score)				
a) Did the company meet with the NGO coalition regarding inquiries on conflict minerals?	Yes = 1 pt, No = 0 pt	1	No comments provided.	Yes.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
b) Has the company held regular communication with NGO coalition regarding conflict minerals (at least bi-monthly)?	Yes = 1 pt, No = 0 pt	1		Yes.
Section 5: Support for Legislation (6 pts max score)				
a) Did the company participate in the Multi-stakeholder group of NGOs, companies, and investors to the SEC and sign on to the Group's letters?	Yes = 2 pts, No = 0 pts	2	"We are part of the group and signed onto the first letter."	Dell's involvement was helpful in the Multi-Stakeholder Group.
b) Did the company issue a statement advocating for legislation in Europe on conflict minerals?	Yes = 2 pts, No = 0 pts	0	"No."	Europe is a substantial market for the company, and it therefore has interest in public policy in Europe. The company's public statements for legislation in Europe would therefore make a difference on this important issue and would be welcome.
c) Did the company issue a public statement against the threatened lawsuit against the SEC regulations on conflict minerals by the Chamber of Commerce?	Yes = 2 pts, No = 0 pts	0	"No."	Not to our knowledge. According to OpenSecrets.org, Dell spent \$2,540,000 on lobbying in 2011. In furtherance of steps on conflict minerals, Enough would welcome a statement against the threatened lawsuit, following statements by Microsoft and GE. IT industry statements on SOPA helped reverse the Chamber's position in 2011.
Scoring	48 pts max	19		
Rating %		40%		

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
Section 1: Trace (10 pts max score)				
a) Has the company investigated and come to know precisely which companies refine/smelt the company's supply of 3TG, with third-party verification?	0.5 pts for each metal investigated, 0.5 pts for each metal verified, max 4 pts.	2	"HP has conducted an investigation into refiners and smelters included in our supply chain. HP as requested that our 3TG suppliers adopt a DRC conflict free policy, query their suppliers on smelters used, and report to HP names of smelters in their supply chain by using the EICC-GeSI template by November 2011. HP is vetting the information received and working with the EICC to create a consolidated list of known smelters. We have learned that we have hundreds of smelters in our supply chain. For example 10 of the 11 CFS compliant tantalum smelters are in our supply chain. HP has investigated the use of all 3TG metals, but has not verified the sources. HP is planning to be more demanding of suppliers in its queries as to who their smelters actually are."	Two points for the investigation, which included over 800 suppliers as to who their smelters. Enough looks forward to the company's third-party verification of the smelters.
b) Has the company published the refiners it uses for 3TG?	1 pt for each metal published, max 4 pts.	0	"HP is currently evaluating whether to publish a list of refiners/smelters we compiled from our initial suppliers survey in 2011. HP is working on the list of company names we received from our suppliers (some are smelters, some are not, and for the rest we are unsure). In addition, we have incomplete contact information for most of the company names. It is difficult for us to estimate at this time when we will be ready to share a list of names publicly. The tantalum and tin smelters revealed through the EICC-GeSI RESOLVE project are likely to be in HP's metal supply chain. Actors in the tin and tantalum supply chains are published here: http://eicc-gesi.resolv.wikispaces.net/Supply+Chain+Maps "	HP published its list of production suppliers in January 2011 but this did not include any smelters, to our knowledge. Enough would welcome publication of the smelters identified in its investigation, either by number or by name. http://www.hp.com/hpinfo/globalcitizenship/pdf/hp_suppliers_2010_gcr.pdf
c) Has the company visited at least two of its refiners and inquired about the use of conflict minerals within the past year?	Yes = 2 pts, No = 0 pts	2	"Yes. As part of the smelter validation sub-team of the EICC-GeSI extractives working group, HP social & environmental responsibility auditors have visited and reviewed the practices of metal smelting facilities in China (F&X-tantalum in November 2011, and a tungsten smelter in February 2012). We also met with the Shanghai Gold Exchange in February 2011."	Two smelters and one gold exchange visited in 2011. Good step by HP.
Section 2: Audit (22 pts max score)				

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
<p>a) Does the company have a stated policy of auditing suppliers of 3TG metals?</p>	<p>Yes = 1 pt for each metal (4 pts max), No = 0 pts</p>	<p>5</p>	<p>"Yes. For our suppliers, we have a stated Supply Chain Social and Environmental Responsibility Policy (http://www.hp.com/hpinfo/globalcitizenship/environment/pdf/suppolicy.pdf) and an externally stated management system including supplier auditing (http://www.hp.com/hpinfo/globalcitizenship/society/supplier_management_system.html) We have also included expectations for our suppliers in the General Specification for the Environment where we discuss HP's expectations regarding supplier verification (see section 3) and list expectations for each 3TG metal (See sections 3.16, 3.34, 3.35, and 3.38) http://www.hp.com/hpinfo/globalcitizenship/environment/pdf/gse.pdf"</p>	<p>Three points were awarded because of HP's requirement that suppliers must source from CFS compliant smelters when a sufficient number becomes available. HP should clarify "sufficient" and should begin enforcing this policy on tantalum. Two further points were given because HP will audit suppliers that include conflict minerals questions. However, other points were not given because HP does not yet audit its 1st tier suppliers on whether they are using CFS compliant smelters, as per HP's comments to question 2b. "When HP notifies Supplier that there are sufficient Conflict-FreeSmelters (CFS) available, any tantalum, tin, tungsten, or gold used in, or used in the production of, parts, materials, components and products must besourced from a CFS." (see: ftp://58.211.162.7/%C6%B7%B9%DC%B2%BF/%EE%81%E6%C2/%C9%CF%82%F7/%BA%CF%B4T%20%B2%FD%B4T%20GA%D9Y%C1%CF/%B2%BB%CA%B9%D3%C3%D7C%C3%F7%95%F8/GP3-00060-001_R09_HF+EPEAT_10.pdf)</p>

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
b) Has the company conducted internal audits of the procurement practices of 3TG suppliers down to the level of refiner, at least, within the last year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"Yes. HP has requested all of our direct 3TG suppliers to adopt a conflict free policy, query their suppliers on smelters used, and report to HP the names of smelters in their supply chain by using the EICC-GeSI template by November 2011. HP is vetting the information received and working with the EICC to create a consolidated list of known smelters. HP has not yet implemented a specific program for verifying our suppliers' processes for procurement of the 3TG metals, but we plan to as part of our due diligence efforts to comply with the Section 1502 Dodd Frank final rule." HP's policy as of April 2011 is that: "Suppliers are expected to ensure that parts and products supplied to HP are DRC conflict-free (do not contain metals derived from "conflict minerals"; columbite-tantalite (tantalum), cassiterite (tin), gold, wolframite (tungsten), or their derivatives such that they do not directly or indirectly finance or benefit armed groups through mining or mineral trading in the Democratic Republic of the Congo or an adjoining country). Suppliers are to establish policies, due diligence frameworks, and management systems, consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, that are designed to accomplish this goal."	The audits of first tier suppliers incorporating conflict minerals have not yet begun.
c) Has the company had third-party audits conducted of 3TG suppliers down to the level of refiner, at least, within the past year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"HP has not conducted 3rd party audits of suppliers with the focus of conflict minerals at this time."	The audits of first tier suppliers incorporating conflict minerals have not yet begun.
d) Has the company participated in the Extractives Work Group for the EICC-GeSI conflict-free smelter program (CFS)?	Yes = 2 pts, No = 0 pts	2	"Yes. HP has been an active member of the EICC-GeSI Extractives WG and a member of the CFS Audit Review Committee since its launch. To date, 11 tantalum smelters are compliant with the CFS program, and 21 gold, 5 tungsten, and 45 tin companies are in progress."	

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
e) Has the company provided financial support for auditing for 3TG?	Yes = 4 pts for support >\$100K, 2 pts for support >\$50K, 1 pt for support <\$50K.	3	"HP is a member of EICC and a member of GeSI. HP committed \$50k to the PPA and is an acting member of the Governance Committee. HP also contributed \$30k toward the startup of ITSCI. We estimate that between time spent on weekly conference calls and reviewing of associated materials, travel and time to attend smelter visits and supply chain workshops we have spent at least \$50k in internal staff and travel costs over the last year. HP also requests the opportunity to update this response in April 2012. HP has committed \$50k to the Smelter Incentive Program which is designed to encourage smelters to participate in the CFS. Resolve will be administering the program."	Three points were awarded here - for the EICC/GeSI work group contribution, and for the contribution and co-founding of the CFS Early Adopters Program, which totaled above \$50,000. PPA and iTSCI contributions are factored into Question 3c.
f) Has the company developed at least one verifiably conflict-free product, with independently audited supply chains all the way to the point of extraction?	Yes = 4 pts, No = 0 pts.	0	"Yes. HP is one of the few users involved in the Solutions for Hope project where we are using tantalum capacitors from a verified DRC conflict free supply chain sourcing from mines in Katanga, DRC. Many of HP's suppliers also utilize CFS-compliant tantalum smelters."	Solutions for Hope participation is a step toward certification and so is included in Question 3c. It is not a conflict-free electronic product, however, along the lines of Intel's commitment to make a fully conflict-free chip in 2013. But conflict-free electronics should be built on programs similar to SFH.
Section 3: Certify (8 pts max score)				

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
a) Has the company made public statements in support of certification?	Yes = 2 pts, No = 0 pts	2	"HP was part of the PPA launch event and talked to Forbes about the need for traced and certified supply chains. See http://www.forbes.com/sites/amywestervelt/2011/10/12/anticipating-new-sec-rules-tech-companies-shift-to-conflict-free-metals/ ("We joined the alliance to join with other stakeholders to convene resources, and work with the State Department to sponsor mostly existing initiatives in the region that need funding," Celorie explains. "The goal is to help create responsible trade between the mines, concentrators, traders, smelters and exporters. As these minerals go from a mine in the jungle through the smelter and export point, that's where the risk of illegal or armed militia taking advantage of these minerals comes in. We want to create a responsible mineral trade in-region that allows smelters to source conflict-free minerals, with auditing and documentation that certifies the minerals are conflict-free, which then allows those materials to enter our supply chain.") See also statements supporting DRC conflict-free certification in HP's Global Citizenship Report (http://hp.com/hpinfo/globalcitizenship/society/conflict_minerals.html)"	Yes. The company's statement is proactive. HP also was the lead company participant in the Multi-stakeholder Diplomacy Working Group on Congo, which has been working on certification and governance in Congo.
b) Does the company have a stated policy of support for certification?	Yes = 2 pts, No = 0 pts	2	"Yes. (see response to part a.). In addition, HP helped to establish the PPA and was the first company to pledge to the PPA, because we recognize that the creation of a verifiable certification mechanism for minerals arising from the DRC and neighboring countries is extremely important in order to ensure a sustainable supply of minerals from the region that can be procured and sued legitimately in the metals supply chain."	See 3a
c) Has the company provided financial support for certification? Participation in the Public Private Alliance (PPA) would count for points: PPA is a step toward certification but not certification, as per the definition: certification as a multi-stakeholder process similar to the Kimberley and/or Forest Stewardship Council processes, which would be an international regime to trace, audit, and certify 3TG metals as being conflict-free.	Yes = 2 pts for support > \$500K, 1.5 pts for support >\$200K, 1 pt for support <\$200K, No = 0 pts	2	"Yes. HP is a member of EICC and a member of GeSI, whom have joined the PPA. HP committed \$50k to the PPA and is an acting member of the Governance Committee. HP also contributed \$30k toward the startup of ITSCI."	One point for participation in the PPA and one point for participation in Solutions for Hope project. Neither of these are certification processes, but they are steps toward certification, as clarified in the question.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
d) Has the company participated in the process for developing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and did it commit to piloting the guidance?	Yes = 2 pts, No = 0 pts	2	"Definitely. HP was very active in the the Guidance through the EICC through the end of 2010. HP also is an active and productive company member of the OECD pilot implementation."	Yes. (See http://www.oecd.org/dataoecd/17/59/50542591.pdf) This is a positive step, and Enough would welcome publication of the steps that the company is taking to implement the Guidance on its website.
Section 4: Stakeholder Engagement (2 pts max score)				
a) Did the company meet with the NGO coalition regarding inquiries on conflict minerals?	Yes = 1 pt, No = 0 pt	1	"Since early 2009 HP has engaged in dialogue with Enough on conflict minerals. HP has active engagement with Enough in the Multi-Stakeholder Group, the PPA and the OECD pilot. HP also traveled to the DRC with Enough to asses the on the ground situation in the Kivus."	Yes.
b) Has the company held regular communication with NGO coalition regarding conflict minerals (at least bi-monthly)?	Yes = 1 pt, No = 0 pt	1	"Yes. HP has attended and provided monthly conference call facilities for the Responsible Sourcing Network-DRC conflict minerals multi-stakeholder network of which Enough! and other stakeholders regularly participate. HP also serves with Enough on the Governance COmmittee and the In-Region Sourcing WG of the PPA."	Yes. HP has been very active with multiple multi-stakeholder groups on conflict minerals, which is a welcome step.
Section 5: Support for Legislation (6 pts max score)				
a) Did the company participate in the Multi-stakeholder group of NGOs, companies, and investors to the SEC and sign on to the Group's letters?	Yes = 2 pts, No = 0 pts	2	"Yes. HP signed all four letters, and participated in the meetings with the SEC (November 2010, March 2011, June 2011, November 2011, and February 2012)."	HP's involvement in the Multi-stakeholder Group was helpful.
b) Did the company issue a statement advocating for legislation in Europe on conflict minerals?	Yes = 2 pts, No = 0 pts	0	"No."	No points were given, because HP did not issue a statement advocating for legislation in Europe on conflict minerals. However, HP deserve mention for their trip to Brussels to meet with the European Commission on the issue of conflict minerals. However, the company did not issue a statement pushing for legislation, which would help move the public debate toward legislation in Europe. Enough would encourage such a statement.
c) Did the company issue a public statement against the threatened lawsuit against the SEC regulations on conflict minerals by the Chamber of Commerce?	Yes = 2 pts, No = 0 pts	0	No.	According to OpenSecrets.org, HP spent \$6,221,007 on lobbying in 2011. In furtherance of steps on conflict minerals, Enough would welcome a statement against the threatened lawsuit, following statements by Microsoft and GE. IT industry statements on SOPA helped reverse the Chamber's position in 2011.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
Scoring	48 pts max	26		
Rating %		54%		

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
Section 1: Trace (10 pts max score)				
a) Has the company investigated and come to know precisely which companies refine/smelt the company's supply of 3TG, with third-party verification?	0.5 pts for each metal investigated, 0.5 pts for each metal verified, max 4 pts.	0	No comments provided.	Not to our knowledge.
b) Has the company published the refiners it uses for 3TG?	1 pt for each metal published, max 4 pts.	0	No comments provided.	Not to our knowledge. Enough would welcome publication of the number and/or name of the smelters in the company's supply chain, as some companies have already done. This would aid transparency in the supply chain at the critical chokepoint in the chain for conflict minerals.
c) Has the company visited at least two of its refiners and inquired about the use of conflict minerals within the past year?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Not to our knowledge. Enough would welcome the company's visit to smelters, as this would send important messages about the need for all smelters to go through independent audits, for example through the CFS process.
Section 2: Audit (22 pts max score)				
a) Does the company have a stated policy of auditing suppliers of 3TG metals?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	No comments provided.	No points were given, because HTC does not appear to audit its suppliers based on the EICC Code. HTC states that it will "encourage its own first-tier suppliers" to align with the EICC Code, but not audit them. The Code states that suppliers must conduct due diligence with regard to the source and mine of origin of 3TG and make this due diligence available upon request but does not require suppliers to only source from CFS compliant smelters. Full points were not given because the company does not yet have a policy of requiring its suppliers to only source from CFS compliant smelters, once a sufficient number are available. Such a policy would send strong signals to smelters to participate in the CFS program. Also, the company does not yet have an audit program of its suppliers to enforce this policy. Enough would welcome such an audit program and requirement, to help ensure that its suppliers are using conflict-free smelters and minerals.
b) Has the company conducted internal audits of the procurement practices of 3TG suppliers down to the level of refiner, at least, within the last year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	No comments provided.	Not to our knowledge. Enough would welcome this step, along the line of Intel's commitment to making a fully conflict-free chip in 2013.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
c) Has the company had third-party audits conducted of 3TG suppliers down to the level of refiner, at least, within the past year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	No comments provided.	Not to our knowledge.
d) Has the company participated in the Extractives Work Group for the EICC-GeSI conflict-free smelter program (CFS)?	Yes = 2 pts, No = 0 pts	2	No comments provided.	Yes.
e) Has the company provided financial support for auditing for 3TG?	Yes = 4 pts for support >\$100K, 2 pts for support >\$50K, 1 pt for support <\$50K.	0	No comments provided.	Not to our knowledge.
f) Has the company developed at least one verifiably conflict-free product, with independently audited supply chains all the way to the point of extraction?	Yes = 4 pts, No = 0 pts.	0	No comments provided.	Not to our knowledge. Enough would welcome this step, along the line of Intel's commitment to making a fully conflict-free chip in 2013.
Section 3: Certify (8 pts max score)				
a) Has the company made public statements in support of certification?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Not to our knowledge. Enough would welcome such a statement, which would help encourage government and multi-stakeholder action to act more quickly to develop a clean minerals trade in the Great Lakes Region.
b) Does the company have a stated policy of support for certification?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Not to our knowledge.
c) Has the company provided financial support for certification? Participation in the Public Private Alliance (PPA) would count for points; PPA is a step toward certification but not certification, as per the definition: certification as a multi-stakeholder process similar to the Kimberley and/or Forest Stewardship Council processes, which would be an international regime to trace, audit, and certify 3TG metals as being conflict-free.	Yes = 2 pts for support > \$500K, 1.5 pts for support >\$200K, 1 pt for support <\$200K, No = 0 pts	0	No comments provided.	Not to our knowledge.
d) Has the company participated in the process for developing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and did it commit to piloting the guidance?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Not to our knowledge.
Section 4: Stakeholder Engagement (2 pts max score)				
a) Did the company meet with the NGO coalition regarding inquiries on conflict minerals?	Yes = 1 pt, No = 0 pt	0	No comments provided.	Not to our knowledge.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
b) Has the company held regular communication with NGO coalition regarding conflict minerals (at least bi-monthly)?	Yes = 1 pt, No = 0 pt	0	No comments provided.	No. HTC is not a regular participant in the monthly multi-stakeholder calls on conflict minerals, is not part of the PPA, was not part of the Multi-stakeholder group on the SEC, and did not participate in the OECD process. Enough would welcome the company's participation in at least some of these important fora for dialogue with civil society.
Section 5: Support for Legislation (6 pts max score)				
a) Did the company participate in the Multi-stakeholder group of NGOs, companies, and investors to the SEC and sign on to the Group's letters?	Yes = 2 pts, No = 0 pts	0	No comments provided.	The United States is a substantial market for the company, and it therefore has interest in public policy in the U.S. The company's participation in the Multi-stakeholder Group would therefore be welcome, or in individual submissions to the SEC.
b) Did the company issue a statement advocating for legislation in Europe on conflict minerals?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Europe is a substantial market for the company, and it therefore has interest in public policy in Europe. The company's public statements for legislation in Europe would therefore make a difference on this important issue and would be welcome.
c) Did the company issue a public statement against the threatened lawsuit against the SEC regulations on conflict minerals by the Chamber of Commerce?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Not to our knowledge. According to OpenSecrets.org, HTC spent \$350,000 on lobbying in 2011. In furtherance of steps on conflict minerals, Enough would welcome a statement against the threatened lawsuit, following statements by Microsoft and GE. IT industry statements on SOPA helped reverse the Chamber's position in 2011.
Scoring		48 pts max	2	
Rating %			4%	

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
Section 1: Trace (10 pts max score)				
a) Has the company investigated and come to know precisely which companies refine/smelt the company's supply of 3TG, with third-party verification?	0.5 pts for each metal investigated, 0.5 pts for each metal verified, max 4 pts.	2	"The company is employing the EICC due diligence template to upstream suppliers, incorporating all four metals. This was sent to 38 direct suppliers, and response rate was over 95%. The company estimates that there are approximately 100 smelters in its supply chain. It plans to validate this number through the EICC-GeSI work group. No timeline on this yet."	Two points for the investigation, which includes an estimate of the number of smelters. Enough looks forward to the company's third-party verification of the smelters.
b) Has the company published the refiners it uses for 3TG?	1 pt for each metal published, max 4 pts.	0	No comments provided.	Not to our knowledge. Enough would welcome publication of the number and/or name of the smelters in the company's supply chain, as some companies have already done. This would aid transparency in the supply chain at the critical chokepoint in the chain for conflict minerals.
c) Has the company visited at least two of its refiners and inquired about the use of conflict minerals within the past year?	Yes = 2 pts, No = 0 pts	1	No comments provided.	Company visited one smelter. Enough would welcome the company's visit to more smelters, as this would send important messages about the need for all smelters to go through independent audits, for example through the CFS process.
Section 2: Audit (22 pts max score)				
a) Does the company have a stated policy of auditing suppliers of 3TG metals?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	4	"Using due diligence template. Not at the level yet of commercially using suppliers Procurement policy. When there is enough companies listed, we would require them to do so. But not yet. We expect suppliers to adhere to the Code of Conduct. Within the current EICC Code of Conduct, 4.0 audits will incorporate conflict minerals, and will be used in the second half of 2012. EICC has a Validated Audit Process. Biggest user of the VAP process, use the EICC audits on all IBM hardware suppliers, which number over 100."	Yes. The company will use the EICC Code to audit its suppliers, which will include conflict minerals in 2012. However, the company does not yet audit its 1st tier or other suppliers with regard to whether they are using CFS compliant smelters. Enough would welcome such an audit program. A requirement for suppliers to use only CFS compliant smelters would be possible now, and enforcement of this policy could begin with tantalum, where a majority of tantalum smelters have been certified.
b) Has the company conducted internal audits of the procurement practices of 3TG suppliers down to the level of refiner, at least, within the last year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"Not yet. EICC Code of Conduct audits will be conducted in late 2012."	The audits of first tier suppliers incorporating conflict minerals have not yet begun.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
c) Has the company had third-party audits conducted of 3TG suppliers down to the level of refiner, at least, within the past year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	As described in our call, IBM is utilizing the EICC/GeSI CFS to assess upstream smelters. To feed the CFS system, IBM has been submitting completed upstream Due Diligence supplier templates to the EICC with the express purpose of having the noted 3TG smelters invited to participate in the CFS process. In looking at the submitted surveys, all four materials have been covered (3TG). For purposes of this survey, I can state that of the publically posted compliant tantalum suppliers, four of the noted smelters are in IBM's extended supply chain. As a result of the noted use of the due diligence surveys, the identification of 3TG smelters, and that a number of 3TG smelters are currently in process for audits, IBM should be awarded 4.0 points for this activity.	The audits of first tier suppliers incorporating conflict minerals have not yet begun.
d) Has the company participated in the Extractives Work Group for the EICC-GeSI conflict-free smelter program (CFS)?	Yes = 2 pts, No = 0 pts	2	No comments provided.	Yes.
e) Has the company provided financial support for auditing for 3TG?	Yes = 4 pts for support >\$100K, 2 pts for support >\$50K, 1 pt for support <\$50K.	1	"Fund to iTSCi process \$30,000, in-kind support greater than \$50k."	One point was given for EICC Working Group contribution, which funds the overall CFS program. Additional points would be given here for participation in the CFS Early Adopters Program, to incentize smelters to participate in the audits http://solutions-network.org/site-cfs/ We would welcome the company's participation in the project. ITRI is an industry bag-and-tag system that is not auditing. PPA contributions are covered under Question 3.
f) Has the company developed at least one verifiably conflict-free product, with independently audited supply chains all the way to the point of extraction?	Yes = 4 pts, No = 0 pts.	0	No comments provided.	Not to our knowledge. Enough would welcome this step, along the line of Intel's commitment to making a fully conflict-free chip in 2013.

Section 3: Certify (8 pts max score)

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
a) Has the company made public statements in support of certification?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Not to our knowledge. Enough would welcome such a statement, which would help encourage government and multi-stakeholder action to act more quickly to develop a clean minerals trade in the Great Lakes Region.
b) Does the company have a stated policy of support for certification?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Not to our knowledge.
c) Has the company provided financial support for certification? Participation in the Public Private Alliance (PPA) would count for points: PPA is a step toward certification but not certification, as per the definition: certification as a multi-stakeholder process similar to the Kimberley and/or Forest Stewardship Council processes, which would be an international regime to trace, audit, and certify 3TG metals as being conflict-free.	Yes = 2 pts for support > \$500K, 1.5 pts for support >\$200K, 1 pt for support <\$200K, No = 0 pts	1	No comments provided.	One point was given for the company's contribution to the EICC contribution to the PPA. However, adding the company's name and contribution to the PPA would add significantly to the initiative, and we would welcome the company's individual participation in the PPA and other processes related to certification.
d) Has the company participated in the process for developing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and did it commit to piloting the guidance?	Yes = 2 pts, No = 0 pts	1	No comments provided.	One point was given, because the company participated in OECD meetings to develop the Guidance. However, IBM has not yet agreed to pilot the Guidance. Enough would welcome the company's piloting of the Guidance and publication of its due diligence.
Section 4: Stakeholder Engagement (2 pts max score)				
a) Did the company meet with the NGO coalition regarding inquiries on conflict minerals?	Yes = 1 pt, No = 0 pt	1	No comments provided.	Yes.
b) Has the company held regular communication with NGO coalition regarding conflict minerals (at least bi-monthly)?	Yes = 1 pt, No = 0 pt	0	No comments provided.	No. IBM is not a regular participant in the monthly multi-stakeholder calls on conflict minerals, is not part of the PPA, was not part of the Multi-stakeholder group on the SEC, and did not participate in the OECD process. Enough would welcome the company's participation in at least some of these important fora for dialogue with civil society.
Section 5: Support for Legislation (6 pts max score)				
a) Did the company participate in the Multi-stakeholder group of NGOs, companies, and investors to the SEC and sign on to the Group's letters?	Yes = 2 pts, No = 0 pts	0	No comments provided.	The United States is a substantial market for the company, and it therefore has interest in public policy in the U.S. The company's participation in the Multi-stakeholder Group would therefore be welcome, or in individual submissions to the SEC.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
b) Did the company issue a statement advocating for legislation in Europe on conflict minerals?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Europe is a substantial market for the company, and it therefore has interest in public policy in Europe. The company's public statements for legislation in Europe would therefore make a difference on this important issue and would be welcome.
c) Did the company issue a public statement against the threatened lawsuit against the SEC regulations on conflict minerals by the Chamber of Commerce?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Not to our knowledge. According to OpenSecrets.org, IBM spent \$4,940,000 on lobbying in 2011. In furtherance of steps on conflict minerals, Enough would welcome a statement against the threatened lawsuit, following statements by Microsoft and GE. IT industry statements on SOPA helped reverse the Chamber's position in 2011.
Scoring	48 pts max	13		
Rating %		27%		

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
Section 1: Trace (10 pts max score)				
a) Has the company investigated and come to know precisely which companies refine/smelt the company's supply of 3TG, with third-party verification?	0.5 pts for each metal investigated, 0.5 pts for each metal verified, max 4 pts.	2	"All four have been investigated, 3rd party verification happening in Ta."	Two points for investigation. Enough looks forward to the verification of all four metals. The EICC working group is verifying the smelters now.
b) Has the company published the refiners it uses for 3TG?	1 pt for each metal published, max 4 pts.	2	No comments provided.	Intel published that it had 130 smelters in its conflict minerals white paper (May 2012) but did not name the smelters. Hence two points were given - for publishing the number but not the names of the smelters.
c) Has the company visited at least two of its refiners and inquired about the use of conflict minerals within the past year?	Yes = 2 pts, No = 0 pts	3	"We have visited over 50 smelters, more than any other company. We led the efforts here, utilizing the early visits to help develop the protocols that are now the standard use by 3rd party auditors via the CFS program. We believe the allowable points here under represent Intel's contribution in this area."	The 2011 corporate responsibility report documents that Intel visited 23 smelters in 2011 and over 50 smelters overall. Because this goes over 10 times beyond the Enough ranking criteria and the effort of every other company, one bonus point was awarded.
Section 2: Audit (22 pts max score)				
a) Does the company have a stated policy of auditing suppliers of 3TG metals?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	4	"We have not yet finalized the method by which we will audit our suppliers - we are waiting for the final SEC rule to ensure our plans meet the due diligence guidelines. However, we have been actively engaged with our supply line on this process."	Yes. The company will include conflict minerals in its audits of suppliers through use of the EICC Code, which will include conflict minerals in 2012. However, the company does not yet audit its 1st tier or other suppliers with regard to whether they are using CFS compliant smelters. Enough would welcome such an audit program. A requirement for suppliers to use only CFS compliant smelters would be possible now, and enforcement of this policy could begin with tantalum, where a majority of tantalum smelters have been certified.
b) Has the company conducted internal audits of the procurement practices of 3TG suppliers down to the level of refiner, at least, within the last year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	No comments provided.	The audits of first tier suppliers incorporating conflict minerals have not yet begun.
c) Has the company had third-party audits conducted of 3TG suppliers down to the level of refiner, at least, within the past year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"Many Ta smelters; Sn starting."	The audits of first tier suppliers incorporating conflict minerals have not yet begun.
d) Has the company participated in the Extractives Work Group for the EICC-GeSI conflict-free smelter (CFS)?	Yes = 2 pts, No = 0 pts	3	"We co-chair the Extractives WG, chair the Audit Review Committee, Lead the Conflict Free Smelter subteam, and are an active participant on the Due diligence subteam."	One bonus point for co-chairing the Extractives working group.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
e) Has the company provided financial support for auditing for 3TG?	Yes = 4 pts for support >\$100K, 2 pts for support >\$50K, 1 pt for support <\$50K.	4	"In addition to other donations, we have committed \$150K to support an 'early adopter' program with smelters to help encourage early participation in the EICC-GeSi CFS program."	Four points were given here, for the EICC contribution that funds the CFS, plus the contribution toward the Early Adopters program.
f) Has the company developed at least one verifiably conflict-free product, with independently audited supply chains all the way to the point of extraction?	Yes = 4 pts, No = 0 pts.	2	"We don't have a product, but we have a goal for a "conflict-free" product in 2013. Published in our SEC 10-K report: http://www.intc.com/secfiling.cfm?filingID=1193125-12-75534 "	Intel was the first company to publicly commit to manufacturing a fully conflict-free product. Enough applauds this first-time action, which paves the way for industry commitment. Because it is not yet finalized, two points instead of four are given.
Section 3: Certify (8 pts max score)				
a) Has the company made public statements in support of certification?	Yes = 2 pts, No = 0 pts	2	"Intel believes that an effective solution to this issue will involve coordinated efforts by governments, industry, and NGOs.... These recent efforts [support to the PPA and Solutions for Hope] build on earlier work of EICC and GeSI to find a traceability/certification program that could be used in the DRC. In 2010, EICC and GeSI had reviewed several programs and the industry group decided to support the ITSCI plan put forward by ITRI. We continue our quest to find a responsible in-region sourcing solution as part of our overall effort to achieve conflict-free supply chains."	Intel went above and beyond on certification, meeting with high-level US government officials to call for improved certification process in Central Africa.
b) Does the company have a stated policy of support for certification?	Yes = 2 pts, No = 0 pts	2	Support development of independently verifiable supply chain transactions, when available and credible, to document the routes taken and intermediaries involved from mine of origin to final product.	See 3a.
c) Has the company provided financial support for certification? Participation in the Public Private Alliance (PPA) would count for points: PPA is a step toward certification but not certification, as per the definition: certification as a multi-stakeholder process similar to the Kimberley and/or Forest Stewardship Council processes, which would be an international regime to trace, audit, and certify 3TG metals as being conflict-free.	Yes = 2 pts for support > \$500K, 1.5 pts for support >\$200K, 1 pt for support <\$200K, No = 0 pts	2	No comments provided.	One point for participation in the PPA and one point for participation in Solutions for Hope project. Neither of these are certification processes, but they are steps toward certification, as clarified in the question.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
d) Has the company participated in the process for developing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and did it commit to piloting the guidance?	Yes = 2 pts, No = 0 pts	1	No comments provided.	The company participated in the OECD meetings to develop the Guidance but has not yet agreed to pilot the Guidance. Enough would welcome the company's piloting of the Guidance and publication of its due diligence.
Section 4: Stakeholder Engagement (2 pts max score)				
a) Did the company meet with the NGO coalition regarding inquiries on conflict minerals?	Yes = 1 pt, No = 0 pt	1	No comments provided.	Yes.
b) Has the company held regular communication with NGO coalition regarding conflict minerals (at least bi-monthly)?	Yes = 1 pt, No = 0 pt	1	No comments provided.	Yes. Company is a regular participant in all multi-stakeholder fora.
Section 5: Support for Legislation (6 pts max score)				
a) Did the company participate in the Multi-stakeholder group of NGOs, companies, and investors to the SEC and sign on to the Group's letters?	Yes = 2 pts, No = 0 pts	0	No comments provided.	The United States is a substantial market for the company, and it therefore has interest in public policy in the U.S. The company's participation in the Multi-stakeholder Group would therefore be welcome, or in individual submissions to the SEC.
b) Did the company issue a statement advocating for legislation in Europe on conflict minerals?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Europe is a substantial market for the company, and it therefore has interest in public policy in Europe. The company's public statements for legislation in Europe would therefore make a difference on this important issue and would be welcome.
c) Did the company issue a public statement against the threatened lawsuit against the SEC regulations on conflict minerals by the Chamber of Commerce?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Not to our knowledge. According to OpenSecrets.org, Intel spent \$3,815,290 on lobbying in 2011. In furtherance of steps on conflict minerals, Enough would welcome a statement against the threatened lawsuit, following statements by Microsoft and GE. IT industry statements on SOPA helped reverse the Chamber's position in 2011.
Scoring		48 pts max	29	
			60%	

*Intel is a member of EICC

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
Section 1: Trace (10 pts max score)				
a) Has the company investigated and come to know precisely which companies refine/smelt the company's supply of 3TG, with third-party verification?	0.5 pts for each metal investigated, 0.5 pts for each metal verified, max 4 pts.	0	Lenovo has not conducted any formal tracing efforts as of yet. We are awaiting the EICC Due Diligence template 2.0 to start that effort. Also I have offered to volunteer Lenovo to participate in pilot testing of the EICC/AIAG Due Diligence Linkage tool IPoint. Lenovo is currently participating in the Extractives WG and is fully interested and engaged on conflict minerals.	Not yet. Enough would welcome a supply chain investigation by Lenovo.
b) Has the company published the refiners it uses for 3TG?	1 pt for each metal published, max 4 pts.	0	No comments provided.	Not to our knowledge. Enough would welcome publication of the number and/or name of the smelters in the company's supply chain, as some companies have already done. This would aid transparency in the supply chain at the critical chokepoint in the chain for conflict minerals.
c) Has the company visited at least two of its refiners and inquired about the use of conflict minerals within the past year?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Not to our knowledge. Enough would welcome the company's visit to smelters, as this would send important messages about the need for all smelters to go through independent audits, for example through the CFS process.
Section 2: Audit (22 pts max score)				
a) Does the company have a stated policy of auditing suppliers of 3TG metals?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	4	Yes. Currently we have 97% procurement spend contractually agree to comply with the EICC code including the new due diligence element added in the April 2012 revision. Of that 98% conduct the SAQ's annually and we are converting from e-Tasc to EICC-On this year (target Oct.). Of that 92% have done EICC third-party audits. We also have added 26 suppliers to our current list of suppliers to focus on.	Yes. The company will use the EICC Code to audit its suppliers, which will include conflict minerals in 2012. However, the company does not yet audit its 1st tier or other suppliers with regard to whether they are using CFS compliant smelters. Enough would welcome such an audit program. A requirement for suppliers to use only CFS compliant smelters would be possible now, and enforcement of this policy could begin with tantalum, where a majority of tantalum smelters have been certified.
b) Has the company conducted internal audits of the procurement practices of 3TG suppliers down to the level of refiner, at least, within the last year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	No comments provided.	The audits of first tier suppliers incorporating conflict minerals have not yet begun.
c) Has the company had third-party audits conducted of 3TG suppliers down to the level of refiner, at least, within the past year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	No comments provided.	The audits of first tier suppliers incorporating conflict minerals have not yet begun.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
d) Has the company participated in the Extractives Work Group for the EICC-GeSI conflict-free smelter program (CFS)?	Yes = 2 pts, No = 0 pts	2	"Yes."	Yes.
e) Has the company provided financial support for auditing for 3TG?	Yes = 4 pts for support >\$100K, 2 pts for support >\$50K, 1 pt for support <\$50K.	1	No comments provided.	One point was given for EICC Working Group contribution, which funds the overall CFS program. Additional points would be given here for participation in the CFS Early Adopters Program, to incentivize smelters to participate in the audits http://solutions-network.org/site-cfs/ We would welcome the company's participation in the project. ITRI is an industry bag-and-tag system that is not auditing. PPA contributions are covered under Question 3.
f) Has the company developed at least one verifiably conflict-free product, with independently audited supply chains all the way to the point of extraction?	Yes = 4 pts, No = 0 pts.	0	No comments provided.	Not to our knowledge. Enough would welcome this step, along the line of Intel's commitment to making a fully conflict-free chip in 2013.
Section 3: Certify (8 pts max score)				
a) Has the company made public statements in support of certification?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Not to our knowledge. Enough would welcome such a statement, which would help encourage government and multi-stakeholder action to act more quickly to develop a clean minerals trade in the Great Lakes Region.
b) Does the company have a stated policy of support for certification?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Not to our knowledge.
c) Has the company provided financial support for certification? Participation in the Public Private Alliance (PPA) would count for points; PPA is a step toward certification but not certification, as per the definition: certification as a multi-stakeholder process similar to the Kimberley and/or Forest Stewardship Council processes, which would be an international regime to trace, audit, and certify 3TG metals as being conflict-free.	Yes = 2 pts for support > \$500K, 1.5 pts for support >\$200K, 1 pt for support <\$200K, No = 0 pts	1	No comments provided.	One point was given for the company's contribution to the EICC contribution to the PPA. However, adding the company's name and contribution to the PPA would add significantly to the initiative, and we would welcome the company's individual participation in the PPA and other processes related to certification.
d) Has the company participated in the process for developing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and did it commit to piloting the guidance?	Yes = 2 pts, No = 0 pts	0	"Yes."	No points were awarded, as the company did not participate in the OECD meetings to develop the Guidance to our knowledge and has not yet agreed to pilot the Guidance. Enough would welcome the company's piloting of the Guidance and publication of its due diligence.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
Section 4: Stakeholder Engagement (2 pts max score)				
a) Did the company meet with the NGO coalition regarding inquiries on conflict minerals?	Yes = 1 pt, No = 0 pt	0	No comments provided.	No.
b) Has the company held regular communication with NGO coalition regarding conflict minerals (at least bi-monthly)?	Yes = 1 pt, No = 0 pt	0	No comments provided.	No. Lenovo is not a regular participant in the monthly multi-stakeholder calls on conflict minerals, is not part of the PPA, was not part of the Multi-stakeholder group on the SEC, and did not participate in the OECD process. Enough would welcome the company's participation in at least some of these important fora for dialogue with civil society.
Section 5: Support for Legislation (6 pts max score)				
a) Did the company participate in the Multi-stakeholder group of NGOs, companies, and investors to the SEC and sign on to the Group's letters?	Yes = 2 pts, No = 0 pts	0	No comments provided.	The United States is a substantial market for the company, and it therefore has interest in public policy in the U.S. The company's participation in the Multi-stakeholder Group would therefore be welcome, or in individual submissions to the SEC.
b) Did the company issue a statement advocating for legislation in Europe on conflict minerals?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Europe is a substantial market for the company, and it therefore has interest in public policy in Europe. The company's public statements for legislation in Europe would therefore make a difference on this important issue and would be welcome.
c) Did the company issue a public statement against the threatened lawsuit against the SEC regulations on conflict minerals by the Chamber of Commerce?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Not to our knowledge. According to OpenSecrets.org, Lenovo spent \$480,000 on lobbying in 2011. In furtherance of steps on conflict minerals, Enough would welcome a statement against the threatened lawsuit, following statements by Microsoft and GE. IT industry statements on SOPA helped reverse the Chamber's position in 2011.
Scoring		48 pts max	8	
			17%	

*Lenovo is a member of EICC

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
Section 1: Trace (10 pts max score)				
<p>a) Has the company investigated and come to know precisely which companies refine/smelt the company's supply of 3TG, with third-party verification?</p>	<p>0.5 pts for each metal investigated, 0.5 pts for each metal verified, max 4 pts.</p>	<p>2</p>	<p>"LGE initially investigated the source of its suppliers of tantalum and identified the names of the smelters of the tantalum. Those smelters are not yet CFS certified, but LGE is applying pressure via our supply chain to get those smelters to become CFS certified. Please note that LGE supports the CFS certification program via its membership in the EICC and participation on the EICC/GeSI extractives Work Group. It also is important to point out that the CFS program currently has only certified 11 companies, operating 17 smelters of tantalum metal, to the CFS audit protocols; the CFS program has not yet completed the audit protocols of the other 3TG metals nor has it certified any smelters of 3TG other than tantalum, so it is not yet possible to verify that the tin, tungsten or gold metal smelter sources are conflict mineral-free.</p> <p>LGE has sent the EICC/GeSI Common Reporting Template tool to all relevant suppliers and we are actively reviewing and compiling the information as it is received; as we identify smelters, we will apply pressure for them to become CFS certified via the supply chain and via direct communication. LGE has determined that its mobile communication products are of highest priority as concerns conflict mineral investigations, since cell phones contain all four 3TG metals; so we have a goal of completing the survey of the mobile communications supply chain by the end of March 2012. We have a goal of completing the survey for all other suppliers by the end of May 2012." LGE provides the</p>	<p>Two points awarded for investigation, but verification has not yet been done. It is true that LGE produces a larger number of products than most of the other companies surveyed, but this fact gives them greater influence over the supply chains they engage with.</p>

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
<p>b) Has the company published the refiners it uses for 3TG?</p>	<p>1 pt for each metal published, max 4 pts.</p>	<p>2</p>	<p>"No. In order to obtain information from suppliers on their sources of 3TG, LGE has to promise to keep the information confidential. So, LGE will not reveal the names of our suppliers or their suppliers to the public. When LGE is ready to have our due diligence audited by a third party, we will ask the third party to enter into a non-disclosure agreement prior to revealing the names of our suppliers, their suppliers and ultimately, the names of the smelters of our 3TG metals. Thus, the names of our suppliers and smelters of our 3TG will be revealed to an auditor from a third party, but none of those names will be made publically available via LGE. It will be up to the smelters within our supply chain whether they will submit their names directly to the CFS program; LGE will apply pressure to those not already scheduled for CFS audits to join the CFS program. Once CFS-certified smelters are commonplace for all 3TG metals, LGE intends to require our suppliers to source only from CFS certified or similarly situated smelters, thus applying further pressure on our supply chain and ultimately the smelters within our supply chain."</p>	<p>Yes, LGE found 391 smelters by name in its supply chain. It has not verified this information yet and believes some of them may be metal processors. Two points were given for publishing the number, not the name.</p>
<p>c) Has the company visited at least two of its refiners and inquired about the use of conflict minerals within the past year?</p>	<p>Yes = 2 pts, No = 0 pts</p>	<p>0</p>	<p>"No. We are considering such visits and potentially performing audits, but we do not want to subject the smelters of our 3TG to more disruption than is necessary. We would prefer to ask our supply chain to source only from CFS-certified smelters, but since that is not yet possible, we are requesting that our suppliers send letters to smelters requesting that they become CFS-certified. Once we have identified all smelters within our supply chain, we will ask them directly to become CFS-certified."</p>	<p>Enough would welcome the company's visit to smelters, as this would send important messages about the need for all smelters to go through independent audits, for example through the CFS process.</p>
<p>Section 2: Audit (22 pts max score)</p>				

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
a) Does the company have a stated policy of auditing suppliers of 3TG metals?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	4	<p>"Yes. Our contracts with suppliers include language that gives LGE audit rights. While we have not yet conducted on-site audits of 3TG suppliers, we have submitted the EICC/GeSI Common Reporting Template tool to all relevant suppliers and are compiling results as they are received."</p> <p>EICC code is part of their supplier code of conduct and is a part of contracts so 100% of suppliers were made aware of the EICC code.</p>	Yes. The company will use the EICC Code to audit its suppliers, which will include conflict minerals in 2012. However, the company does not yet audit its 1st tier or other suppliers with regard to whether they are using CFS compliant smelters. Enough would welcome such an audit program. A requirement for suppliers to use only CFS compliant smelters would be possible now, and enforcement of this policy could begin with tantalum, where a majority of tantalum smelters have been certified.
b) Has the company conducted internal audits of the procurement practices of 3TG suppliers down to the level of refiner, at least, within the last year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	<p>"Yes. We have submitted the EICC/GeSI Common Reporting Template tool to all relevant suppliers and have required them to trace their supply chains back to the smelters."</p> <p>In the LGE 2011-2012 Sustainability Report I sent you (electronic copy), on pages 52 – 54 it explains LGE's process for implementing the EICC conduct within LGE and its supply chains. The four step process includes training, assessment, verification and improvement stages. LGE did conduct onsite training and audits as stated in the Sustainability Report.</p>	The audits of first tier suppliers incorporating conflict minerals have not yet begun.
c) Has the company had third-party audits conducted of 3TG suppliers down to the level of refiner, at least, within the past year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"Not yet. We have begun vetting third-party audit companies for potential use in auditing our due diligence with respect to 3TG suppliers. We will depend upon third-party audits of smelters to determine whether they meet CFS program criteria and can become CFS certified."	The audits of first tier suppliers incorporating conflict minerals have not yet begun.
d) Has the company participated in the Extractives Work Group for the EICC-GeSI conflict-free smelter program (CFS)?	Yes = 2 pts, No = 0 pts	2	<p>"Yes. Via our membership in EICC, we are an active member of the Extractives Work Group."</p> <p>"We do call in to conference calls, we receive all communications and meeting minutes and we regularly attend both EICC meetings and Workshops."</p>	Yes

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
e) Has the company provided financial support for auditing for 3TG?	Yes = 4 pts for support >\$100K, 2 pts for support >\$50K, 1 pt for support <\$50K.	1	"Yes. Part of our EICC dues go to funding the CFS program (funding below \$50,000)."	One point was given for EICC Working Group contribution, which funds the overall CFS program. Additional points would be given here for participation in the CFS Early Adopters Program, to incentivize smelters to participate in the audits http://solutions-network.org/site-cfs/ We would welcome the company's participation in the project. ITRI is an industry bag-and-tag system that is not auditing. PPA contributions are covered under Question 3.
f) Has the company developed at least one verifiably conflict-free product, with independently audited supply chains all the way to the point of extraction?	Yes = 4 pts, No = 0 pts.	0	"No."	Not to our knowledge. Enough would welcome this step, along the line of Intel's commitment to making a fully conflict-free chip in 2013.
Section 3: Certify (8 pts max score)				

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
<p>a) Has the company made public statements in support of certification?</p>	<p>Yes = 2 pts, No = 0 pts</p>	<p>0</p>	<p>"http://www.lg.com/global/sustainability/csr-management/conflict_minerals.jsp"</p> <p>"The CFS program is by definition an audit and certification program. While LGE has not explicitly stated that we support CFS certification, our support of CFS certification is strongly implied in the numerous references we make on our global website and in our 2011-2012 LGE Sustainability Report (see page 55 of the attached LGE Sustainability Report). In addition, our global website and sustainability report are publicly accessible documents: since our senior management must approve all such public communications, such public statements are LGE policies. As an illustration of that fact, please refer to the May 10, 2012 testimony of Bruce Calder, General Manager of Claignan Environmental, before the International Monetary Policy and Trade Subcommittee of the United States House of Representatives. On pages 64 – 66 or Mr. Calder's testimony, he included LGE's public statement of our conflict minerals policies from our website. That fact shows that our statements are indeed reaching the public and even the United States government.</p> <p>LGE welcomes any suggestion by EP as to what we could do to make our support of CFS certification more clear; note that LGE believes that the CFS program and certification is absolutely necessary to allow us to do our due diligence as concerns traceability and transparency of conflict minerals</p>	<p>The statement does not make reference to certification, as it is defined in Question 3c. Enough would welcome a statement to help encourage government and multi-stakeholder action to act more quickly to develop a clean minerals trade in the Great Lakes Region.</p>

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
b) Does the company have a stated policy of support for certification?	Yes = 2 pts, No = 0 pts	0	<p>"LGE believes the statement in IIIa above is such a policy. In addition, there is internal support for our membership and participation in the EICC, within which we support the development and implementation of the CFS certification program."</p> <p>"I think we answered this above, but to repeat: all public statements made by LGE concerning LGE actions on a given issue are LGE public policy by virtue of 1) LGE statements are made on websites and in documents freely available to the public; and 2) any public statement made by LGE on websites or in publicly available documents must be approved by LGE upper management and thus become LGE policy."</p> <p>they support our definition of certification and we can put that on the record "as long as its in line with the CFS certification program and accepted by the auditors"</p>	See 3a
c) Has the company provided financial support for certification? Participation in the Public Private Alliance (PPA) would count for points; PPA is a step toward certification but not certification, as per the definition: certification as a multi-stakeholder process similar to the Kimberley and/or Forest Stewardship Council processes, which would be an international regime to trace, audit, and certify 3TG metals as being conflict-free.	Yes = 2 pts for support > \$500K, 1.5 pts for support >\$200K, 1 pt for support <\$200K, No = 0 pts	1	"Yes. As stated above in IIe, LGE has provided financial support to the EICC: a portion of our EICC dues go to support the PPA (under \$200,000)."	One point was given for the company's contribution to the EICC contribution to the PPA. However, adding the company's name and contribution to the PPA would add significantly to the initiative, and we would welcome the company's individual participation in the PPA and other processes related to certification.
d) Has the company participated in the process for developing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and did it commit to piloting the guidance?	Yes = 2 pts, No = 0 pts	0	"Yes. Through our work with EICC and participation in the Extractives Workgroup and several Extractives Workshops, LGE has helped to shape the content of the OECD Guidance."	No points were awarded, as the company did not participate in the OECD meetings to develop the Guidance and has not yet agreed to pilot the Guidance. Enough would welcome the company's piloting of the Guidance and publication of its due diligence. EICC contributed to the Guidance but this question is about the company-specific engagement in the process.
Section 4: Stakeholder Engagement (2 pts max score)				

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
a) Did the company meet with the NGO coalition regarding inquiries on conflict minerals?	Yes = 1 pt, No = 0 pt	1	"LGE has had some engagement with members of the NGO coalition during Extractives Work Shops, but we have had no formal meetings."	Yes.
b) Has the company held regular communication with NGO coalition regarding conflict minerals (at least bi-monthly)?	Yes = 1 pt, No = 0 pt	0	"No."	No. LGE is not a regular participant in the monthly multi-stakeholder calls on conflict minerals, is not part of the PPA, was not part of the Multi-stakeholder group on the SEC, and did not participate in the OECD process. Enough would welcome the company's participation in at least some of these important fora for dialogue with civil society.
Section 5: Support for Legislation (6 pts max score)				
a) Did the company participate in the Multi-stakeholder group of NGOs, companies, and investors to the SEC and sign on to the Group's letters?	Yes = 2 pts, No = 0 pts	0	"No. LGE was not made aware of any opportunity to do so. Because LGE is a company based in South Korea and is not subject to SEC reporting, LGE has no influence in United States matters in this regard." "LGE does have an interest in public policy in the U.S. and the EU, but we do not have much influence on same, as we are seen as a Korean company by foreign governments. That's why lobbying by LGE is minimal (as you said, LGE spent \$40K compared to the millions spent by many of our U.S.-based competitors). Indeed, LGE is not publicly traded on either the U.S. or EU markets, and LGE is not bound to report to the SEC per Dodd-Frank Section 1502. However, LGE is committed to transparently and accurately reporting on our supply chains and sourcing of conflict minerals, as we will need to supply such information to our customers who do have to report to the SEC. It is, in fact, LGE policy that we will determine the sources of all conflict minerals within our supply chains and LGE will report those findings publicly and to our customers."	The United States is a substantial market for the company, and it therefore has interest in public policy in the U.S. The company's participation in the Multi-stakeholder Group would therefore be welcome, or in individual submissions to the SEC.
b) Did the company issue a statement advocating for legislation in Europe on conflict minerals?	Yes = 2 pts, No = 0 pts	0	"No. LGE was not made aware of any opportunity to do so. LGE has little influence in matters regarding EU legislation."	Europe is a substantial market for the company, and it therefore has interest in public policy in Europe. The company's public statements for legislation in Europe would therefore make a difference on this important issue and would be welcome.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
c) Did the company issue a public statement against the threatened lawsuit against the SEC regulations on conflict minerals by the Chamber of Commerce?	Yes = 2 pts, No = 0 pts	0	<p>"No. LGE was not made aware of any opportunity to do so. While LGE is a member of the U.S. Chamber of Commerce, LGE has little influence in United States on such matters."</p> <p>"LGE is considering making a public statement with regard to the U.S. Chamber of Commerce, but such a statement was not and is not forthcoming before our deadlines to supply information to EP."</p>	Not to our knowledge. According to OpenSecrets.org, LGE spent \$40,000 on lobbying in 2011. In furtherance of steps on conflict minerals, Enough would welcome a statement against the threatened lawsuit, following statements by Microsoft and GE. IT industry statements on SOPA helped reverse the Chamber's position in 2011.
Scoring	48 pts max	13		
Rating %		27%		

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
Section 1: Trace (10 pts max score)				
a) Has the company investigated and come to know precisely which companies refine/smelt the company's supply of 3TG, with third-party verification?	0.5 pts for each metal investigated, 0.5 pts for each metal verified, max 4 pts.	2	"Yes, however, Microsoft does not directly contract with smelters and refiners of minerals. Therefore, our process begins with identification of suppliers of 3T and gold metals at the component level. Microsoft requires contracted suppliers to provide the full material declaration forms, IPC 1752-2 Class 6 or IPC 1752A Class A + D, listing the full material composition of products and parts at the homogenous material level by weight. Suppliers are required to submit these material declarations during product development by the Design Validation Review. Each component-level IPC 1752 declaration must be associated with a Manufacturer Part Number and have direct correlation to the Microsoft part number, supplier part number, or manufacturer part number to ensure traceability to a product Bill of Material. IPC 1752 material declarations must be updated when there is a change in the component's material or production process. The material declarations are uploaded upon receipt into a compliance database that is searchable by individual substances including, but not limited to, the 3T and gold metals. In preparation for identifying relevant suppliers, Microsoft runs a search of components that contain these minerals. In actually following this procedure, once Microsoft identified the relevant contracted suppliers, we educated them regarding the conflict minerals issue and asked them to track the source of the identified minerals moving up the multiple Tiers of the supply chain to the associated smelter or refinery. We have directed our suppliers to leverage the	Over 200 smelters have been identified but not fully verified yet. Two points for investigation but not verification.
b) Has the company published the refiners it uses for 3TG?	1 pt for each metal published, max 4 pts.	0	See above	Not to our knowledge. Enough would welcome publication of the number and/or name of the smelters in the company's supply chain, as some companies have already done. This would aid transparency in the supply chain at the critical chokepoint in the chain for conflict minerals.
c) Has the company visited at least two of its refiners and inquired about the use of conflict minerals within the past year?	Yes = 2 pts, No = 0 pts	0	See above	Not to our knowledge. Enough would welcome the company's visit to smelters, as this would send important messages about the need for all smelters to go through independent audits, for example through the CFS process.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
Section 2: Audit (22 pts max score)				
a) Does the company have a stated policy of auditing suppliers of 3TG metals?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	4	<p>"Yes, again Microsoft does not directly contract with any mineral smelters and refineries. As described above, we are developing our management systems and related audit processes to support our conflict minerals procurement policy. We must await SEC guidance relating to due diligence to finalize internal processes.</p> <p>Microsoft also evaluates and audits for the accuracy of its own process for identifying conflict metals in components and has an audit program that evaluates suppliers' control of restricted substances. These audits do not extent up the supply chain all the way to the smelter/refinery level as our direct audits only extend to contracted suppliers, some of which are considered Tier 2. Nonetheless, we have a program in place to ensure that our Tier 1 contracted suppliers implement similar programs in their upstream supply chains that we audit to ensure compliance with Microsoft requirements.</p> <p>Finally, at the refinery/smelter level, Microsoft contributes financial support to auditing the 3T and gold metals supply chain through a portion of our membership dues to the EICC and GeSI. At this point, not all smelters identified by Microsoft contracted suppliers have been subject to a CFS audit. As of February 2012, 45% of our identified tantalum smelters have been audited and determined to be conflict free. We expect the percentage to increase over time as our suppliers ask the remaining smelters to participate in the CFS process."</p>	<p>Yes. The company will use the EICC Code to audit its suppliers, which will include conflict minerals in 2012. However, the company does not yet audit its 1st tier or other suppliers with regard to whether they are using CFS compliant smelters. Enough would welcome such an audit program. A requirement for suppliers to use only CFS compliant smelters would be possible now, and enforcement of this policy could begin with tantalum, where a majority of tantalum smelters have been certified.</p>
b) Has the company conducted internal audits of the procurement practices of 3TG suppliers down to the level of refiner, at least, within the last year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	See above.	The audits of first tier suppliers incorporating conflict minerals have not yet begun.
c) Has the company had third-party audits conducted of 3TG suppliers down to the level of refiner, at least, within the past year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	See above.	The audits of first tier suppliers incorporating conflict minerals have not yet begun.
d) Has the company participated in the Extractives Work Group for the EICC-GeSI conflict-free smelter program (CFS)?	Yes = 2 pts, No = 0 pts	2	See above.	Yes

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
e) Has the company provided financial support for auditing for 3TG?	Yes = 4 pts for support >\$100K, 2 pts for support >\$50K, 1 pt for support <\$50K.	1	See above.	One point was given for EICC Working Group contribution, which funds the overall CFS program. Additional points would be given here for participation in the CFS Early Adopters Program, to incentivize smelters to participate in the audits http://solutions-network.org/site-cfs/ We would welcome the company's participation in the project. ITRI is an industry bag-and-tag system that is not auditing. PPA contributions are covered under Question 3.
f) Has the company developed at least one verifiably conflict-free product, with independently audited supply chains all the way to the point of extraction?	Yes = 4 pts, No = 0 pts.	0	See above.	Not to our knowledge. Enough would welcome this step, along the line of Intel's commitment to making a fully conflict-free chip in 2013.
Section 3: Certify (8 pts max score)				
a) Has the company made public statements in support of certification?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Not to our knowledge. Microsoft's company statements have been focused on "Keeping conflict minerals out of our supply chain," not yet on encouraging a broader certification process for a clean minerals trade from Congo. Enough would welcome such a statement, which would help encourage government and multi-stakeholder action to act more quickly to develop a clean minerals trade in the Great Lakes Region.
b) Does the company have a stated policy of support for certification?	Yes = 2 pts, No = 0 pts	0	No comments provided.	See Question 3a.
c) Has the company provided financial support for certification? Participation in the Public Private Alliance (PPA) would count for points; PPA is a step toward certification but not certification, as per the definition: certification as a multi-stakeholder process similar to the Kimberley and/or Forest Stewardship Council processes, which would be an international regime to trace, audit, and certify 3TG metals as being conflict-free.	Yes = 2 pts for support > \$500K, 1.5 pts for support >\$200K, 1 pt for support <\$200K, No = 0 pts	1	"Yes, in September 2011, Microsoft pledged direct support and a contribution of \$25,000 towards the U.S. government initiated Public-Private Alliance for Responsible Minerals Trade (PPA)."	Yes, great step from Microsoft to join the PPA.
d) Has the company participated in the process for developing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and did it commit to piloting the guidance?	Yes = 2 pts, No = 0 pts	2	"Additionally, Microsoft has contributed to this effort through our membership dues to both the EICC and to GeSI. On another track, we have worked with our industry partners to provide feedback on the OECD Due Diligence guidance and Microsoft is currently participating in Business for Social Responsibility's pilot program for implementing the guidance."	As per OECD, Microsoft has agreed to pilot the Guidance. Enough would welcome publication of the steps that the company is taking to implement the Guidance on its website.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
Section 4: Stakeholder Engagement (2 pts max score)				
a) Did the company meet with the NGO coalition regarding inquiries on conflict minerals?	Yes = 1 pt, No = 0 pt	1	"Microsoft believes that effective long-term solutions regarding conflict minerals require the collaboration of a wide variety of industry sector, public policy and NGO stakeholders. Our teams have been involved with the Multi-stakeholder Group of NGO's and to our best knowledge, we have responded to any known conflict minerals inquiries from the Enough coalition and other concerned stakeholders. We have also proactively briefed socially responsible investors and other members of the investment community on our work to address this."	Yes.
b) Has the company held regular communication with NGO coalition regarding conflict minerals (at least bi-monthly)?	Yes = 1 pt, No = 0 pt	1	No comments provided.	Yes. Microsoft is an irregular participant in multi-stakeholder fora on this issue.
Section 5: Support for Legislation (6 pts max score)				
a) Did the company participate in the Multi-stakeholder group of NGOs, companies, and investors to the SEC and sign on to the Group's letters?	Yes = 2 pts, No = 0 pts	2	"Microsoft has also encouraged our industry associations and joined the Multi-stakeholder Group of NGO's to support laws to increase the transparency concerning and ultimately reduce the use of conflict minerals."	Yes. Good step by Microsoft.
b) Did the company issue a statement advocating for legislation in Europe on conflict minerals?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Europe is a substantial market for the company, and it therefore has interest in public policy in Europe. The company's public statements for legislation in Europe would therefore make a difference on this important issue and would be welcome.
c) Did the company issue a public statement against the threatened lawsuit against the SEC regulations on conflict minerals by the Chamber of Commerce?	Yes = 2 pts, No = 0 pts	2	No comments provided.	Microsoft has issued a statement, which was an excellent step (see: http://www.business-humanrights.org/Documents/GlobalWitnessDoddFrank). In addition, Microsoft spent \$7,335,000 on lobbying in 2011.
Scoring	48 pts max	18		

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
Rating %		38%		

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
Section 1: Trace (10 pts max score)				
a) Has the company investigated and come to know precisely which companies refine/smelt the company's supply of 3TG, with third-party verification?	0.5 pts for each metal investigated, 0.5 pts for each metal verified, max 4 pts.	2	<p>"Motorola has been working with its tantalum capacitor suppliers for more than five years to identify which smelters their raw materials come from. During this same time period, we have required these suppliers to confirm that they were not sourcing materials from conflict areas of the DRC.</p> <p>Motorola has advised its suppliers of the pending U.S. regulations requiring tracing and reporting, and requiring the suppliers to:</p> <ol style="list-style-type: none"> 1. Publish a formal company policy on conflict minerals; 2. Develop a due diligence process for establishing the source of the above materials used in your products. <p>Motorola is engaged in providing the EICC and GeSI Common Reporting Template tool to our suppliers and compiling the results. Motorola intend to publish the status of our supplier survey, including smelter information, in Q1, 2013."</p>	Two points for investigation using the EICC-GeSI reporting template. Enough looks forward to the company's verification of the number of smelters.
b) Has the company published the refiners it uses for 3TG?	1 pt for each metal published, max 4 pts.	0	<p>"Motorola Mobility is in the process of tracing our supply-chain for minerals which may be associated with conflict. We expect to have a smelter list available in 1Q13."</p>	Not to our knowledge. Enough would welcome publication of the number and/or name of the smelters in the company's supply chain, as some companies have already done. This would aid transparency in the supply chain at the critical chokepoint in the chain for conflict minerals.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
c) Has the company visited at least two of its refiners and inquired about the use of conflict minerals within the past year?	Yes = 2 pts, No = 0 pts	0	<p>"Motorola has been active in the Stakeholder Engagement Committee as part EICC / GeSi, which is developing smelter audit protocols.</p> <p>Motorola is an active participant in the GeSi / EICC efforts to develop the capability for the electronics industry to verifiably trace these minerals to their mines or origin. The industry effort includes the Conflict Free Smelter Program, the Audit Review Program (independent audit program), and the development of due diligence guidelines. The objective of these programs it to enable traceability of sourced 3TG minerals.</p> <p>In 2012 Motorola plans to visit two refiners. Motorola intends to add refiner visits to our conflict minerals compliance plan in 2013."</p>	Enough would welcome Motorola Mobility's plan to visit smelters, as this would send important messages about the need for all smelters to go through independent audits, for example through the CFS process.
Section 2: Audit (22 pts max score)				
a) Does the company have a stated policy of auditing suppliers of 3TG metals?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	4	<p>"Motorola Mobility's statement on Sourcing of Metals (http://responsibility.motorola.com/index.php/suppliers/miningmetal/) includes a commitment to "champion more responsible metal sourcing by engaging our suppliers and by participating in collaborative efforts with other stakeholders including, mining companies, non-governmental organizations, labor organizations involved in mining, other industrial sectors that purchase and use metals, the governments and multi-government organizations with jurisdiction over these issues, and end users."</p>	Yes. The company will use the EICC Code to audit its suppliers, which will include conflict minerals in 2012. However, the company does not yet audit its 1st tier or other suppliers with regard to whether they are using CFS compliant smelters. Enough would welcome such an audit program. A requirement for suppliers to use only CFS compliant smelters would be possible now, and enforcement of this policy could begin with tantalum, where a majority of tantalum smelters have been certified.
b) Has the company conducted internal audits of the procurement practices of 3TG suppliers down to the level of refiner, at least, within the last year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"Motorola is engaged in providing the EICC and GeSi Common Reporting Template tool to our suppliers and compiling the results."	The audits of first tier suppliers incorporating conflict minerals have not yet begun.
c) Has the company had third-party audits conducted of 3TG suppliers down to the level of refiner, at least, within the past year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"We are working with the CFS Audit Review program on established criteria for such audits."	The audits of first tier suppliers incorporating conflict minerals have not yet begun.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
d) Has the company participated in the Extractives Work Group for the EICC-GeSI conflict-free smelter program (CFS)?	Yes = 2 pts, No = 0 pts	2	"Yes, Motorola Mobility has participated in the EICC working group for the tantalum smelter validation program."	Yes
e) Has the company provided financial support for auditing for 3TG?	Yes = 4 pts for support >\$100K, 2 pts for support >\$50K, 1 pt for support <\$50K.	1	"Motorola Mobility participates in the CFS program, which is funded from membership dues."	One point was given for EICC Working Group contribution, which funds the overall CFS program. Additional points would be given here for participation in the CFS Early Adopters Program, to incentivize smelters to participate in the audits http://solutions-network.org/site-cfs/ We would welcome the company's participation in the project. ITRI is an industry bag-and-tag system that is not auditing. PPA contributions are covered under Question 3.
f) Has the company developed at least one verifiably conflict-free product, with independently audited supply chains all the way to the point of extraction?	Yes = 4 pts, No = 0 pts.	0	"Presently a system does not exist that enables companies to ensure responsible sourcing of conflict-free metals. Due to the complexity of the minerals supply chain and the number of layers and companies involved, implementing a credible tracking and assurance system takes time and requires the commitment of governments and multiple industries. Significant progress is being made toward the goal of full traceability of the source of metals."	Not to our knowledge. Enough would welcome this step, along the line of Intel's commitment to making a fully conflict-free chip in 2013.
Section 3: Certify (8 pts max score)				
a) Has the company made public statements in support of certification?	Yes = 2 pts, No = 0 pts	2	"Yes: Motorola Mobility supports efforts to obtain conflict free sources of metals from the DRC. We believe that a robust international certification system from mine to smelter, is essential to providing the necessary assurance."	"Motorola Mobility did participate in a meeting at the Department of State with Enough in support of additional involvement by State in pushing governments in Africa to support the industry program for tracing minerals."
b) Does the company have a stated policy of support for certification?	Yes = 2 pts, No = 0 pts	2	"Yes: Motorola Mobility's policy is to support development of an international certification regime."	Yes
c) Has the company provided financial support for certification? Participation in the Public Private Alliance (PPA) would count for points; PPA is a step toward certification but not certification, as per the definition: certification as a multi-stakeholder process similar to the Kimberley and/or Forest Stewardship Council processes, which would be an international regime to trace, audit, and certify 3TG metals as being conflict-free.	Yes = 2 pts for support > \$500K, 1.5 pts for support >\$200K, 1 pt for support <\$200K, No = 0 pts	1	"Motorola Mobility's GeSI dues are allocated, in part, to support the Public Private Alliance."	One point was given for the company's contribution to the EICC contribution to the PPA and for the company's \$30,000 contribution to ITSCI. However, adding the company's name and contribution to the PPA would add significantly to the initiative, and we would welcome the company's individual participation in the PPA and other processes related to certification.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
d) Has the company participated in the process for developing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and did it commit to piloting the guidance?	Yes = 2 pts, No = 0 pts	1	"Motorola Mobility has participated in development of the OECD Due Diligence Guidance through an active role in the relevant working group. The guidance is being piloted on an industry basis. Motorola Mobility is engaged in its own pilot effort."	Motorola participated in the OECD process before it was split into two companies, but has not participated in the process since then. One point was therefore awarded, as the company has not yet agreed to pilot the Guidance. Enough would welcome the company's piloting of the Guidance and publication of its due diligence. EICC contributed to the Guidance but this question is about the company-specific engagement in the process.
Section 4: Stakeholder Engagement (2 pts max score)				
a) Did the company meet with the NGO coalition regarding inquiries on conflict minerals?	Yes = 1 pt, No = 0 pt	1	"Motorola Mobility did participate in a meeting at the Department of State with Enough in support of additional involvement by State in pushing governments in Africa to support the industry program for tracing minerals."	Yes.
b) Has the company held regular communication with NGO coalition regarding conflict minerals (at least bi-monthly)?	Yes = 1 pt, No = 0 pt	0	"No."	No. Motorola Mobility is no longer a regular participant in the monthly multi-stakeholder calls on conflict minerals, is not part of the PPA, was not part of the Multi-stakeholder group on the SEC, and did not participate in the OECD process. Enough would welcome the company's participation in at least some of these important fora for dialogue with civil society.
Section 5: Support for Legislation (6 pts max score)				
a) Did the company participate in the Multi-stakeholder group of NGOs, companies, and investors to the SEC and sign on to the Group's letters?	Yes = 2 pts, No = 0 pts	0	"No."	The United States is a substantial market for the company, and it therefore has interest in public policy in the U.S. The company's participation in the Multi-stakeholder Group would therefore be welcome, or in individual submissions to the SEC.
b) Did the company issue a statement advocating for legislation in Europe on conflict minerals?	Yes = 2 pts, No = 0 pts	1	"Motorola supports the development of legislation that helps companies determine whether or not the sources of the materials they use are associated with conflict."	The statement at left supports legislation generally, which is helpful. Only partial points were awarded because it does not specifically mention Europe, however, as there is an active legislative initiative in Europe.

Motorola Mobility

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
c) Did the company issue a public statement against the threatened lawsuit against the SEC regulations on conflict minerals by the Chamber of Commerce?	Yes = 2 pts, No = 0 pts	0	"No."	Not to our knowledge. According to OpenSecrets.org, Motorola spent \$3,010,000 on lobbying in 2011. In furtherance of steps on conflict minerals, Enough would welcome a statement against the threatened lawsuit, following statements by Microsoft and GE. IT industry statements on SOPA helped reverse the Chamber's position in 2011.
Scoring	48 pts max	17		
Rating %		35%		

Contacted by email twice (February and June 2012), contacted by phone once (June 2012)

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
Section 1: Trace (10 pts max score)				
a) Has the company investigated and come to know precisely which companies refine/smelt the company's supply of 3TG, with third-party verification?	0.5 pts for each metal investigated, 0.5 pts for each metal verified, max 4 pts.	1	Minerals (tantalum, tin, tungsten and gold: hereinafter "conflict minerals") mined in the Democratic Republic of the Congo and neighboring countries are becoming sources of funding for armed groups, creating grave issues such as facilitating conflicts, human rights violations and environmental destruction; and international efforts are being made to resolve this issue. The Nikon Group, with cooperation from our procurement partners, will investigate the status of usage of these conflict minerals, and will make efforts to reduce the use of conflict minerals as much as possible. Based on the Nikon Basic Procurement Policy and the Nikon Procurement Partners' CSR Guidelines, the Nikon Group aims to fulfill its social responsibilities in the entire supply chain. We are in the process of finalizing information from a survey about conflict minerals that was distributed to our procurement partners. We issued the survey regarding conflict minerals to approximately 1,200 procurement partners as part of our investigation into this issue and approximately 200 overseas partners. Survey is not yet complete.	Supply chain investigation conducted with over 1200 suppliers, but it was unclear if the suppliers were queried on which smelters they are using, hence one point was given.
b) Has the company published the refiners it uses for 3TG?	1 pt for each metal published, max 4 pts.	0	No comments provided.	Not to our knowledge. Enough would welcome publication of the number and/or name of the smelters in the company's supply chain, as some companies have already done. This would aid transparency in the supply chain at the critical chokepoint in the chain for conflict minerals.
c) Has the company visited at least two of its refiners and inquired about the use of conflict minerals within the past year?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Enough would welcome the company's visit to smelters, as this would send important messages about the need for all smelters to go through independent audits, for example through the CFS process.
Section 2: Audit (22 pts max score)		0		

Contacted by email twice (February and June 2012), contacted by phone once (June 2012)

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
a) Does the company have a stated policy of auditing suppliers of 3TG metals?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	No comments provided.	No points were given, because the company does not yet audit its 1st tier or other suppliers on conflict minerals, particularly with regard to whether they are using CFS compliant smelters. The company also does not have a policy to require all of its suppliers to only source from CFS compliant smelters, once a sufficient number are available. Such a policy would send strong signals to smelters to participate in the CFS program. Enough would welcome such an audit program and requirement, to help ensure that its suppliers are using conflict-free smelters and minerals.
b) Has the company conducted internal audits of the procurement practices of 3TG suppliers down to the level of refiner, at least, within the last year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	No comments provided.	
c) Has the company had third-party audits conducted of 3TG suppliers down to the level of refiner, at least, within the past year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	No comments provided.	
d) Has the company participated in the Extractives Work Group for the EICC-GeSI conflict-free smelter program (CFS)?	Yes = 2 pts, No = 0 pts	2	No comments provided.	The company joined the CFS through the Japanese electronics association JEITA in 2011.
e) Has the company provided financial support for auditing for 3TG?	Yes = 4 pts for support >\$100K, 2 pts for support >\$50K, 1 pt for support <\$50K.	0	No comments provided.	Not to our knowledge.
f) Has the company developed at least one verifiably conflict-free product, with independently audited supply chains all the way to the point of extraction?	Yes = 4 pts, No = 0 pts.	0	No comments provided.	Not to our knowledge. Enough would welcome this step, along the line of Intel's commitment to making a fully conflict-free chip in 2013.
Section 3: Certify (8 pts max score)		0		
a) Has the company made public statements in support of certification?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Not to our knowledge. Enough would welcome such a statement, which would help encourage government and multi-stakeholder action to act more quickly to develop a clean minerals trade in the Great Lakes Region.
b) Does the company have a stated policy of support for certification?	Yes = 2 pts, No = 0 pts	0	No comments provided.	

Contacted by email twice (February and June 2012), contacted by phone once (June 2012)

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
c) Has the company provided financial support for certification? Participation in the Public Private Alliance (PPA) would count for points: PPA is a step toward certification but not certification, as per the definition: certification as a multi-stakeholder process similar to the Kimberley and/or Forest Stewardship Council processes, which would be an international regime to trace, audit, and certify 3TG metals as being conflict-free.	Yes = 2 pts for support > \$500K, 1.5 pts for support >\$200K, 1 pt for support <\$200K, No = 0 pts	0	No comments provided.	
d) Has the company participated in the process for developing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and did it commit to piloting the guidance?	Yes = 2 pts, No = 0 pts	0	No comments provided.	
Section 4: Stakeholder Engagement (2 pts max score)		0		
a) Did the company meet with the NGO coalition regarding inquiries on conflict minerals?	Yes = 1 pt, No = 0 pt	1	No comments provided.	Yes.
b) Has the company held regular communication with NGO coalition regarding conflict minerals (at least bi-monthly)?	Yes = 1 pt, No = 0 pt	0	No comments provided.	No. Nikon is not a regular participant in the monthly multi-stakeholder calls on conflict minerals, is not part of the PPA, was not part of the Multi-stakeholder group on the SEC, and did not participate in the OECD process. Enough would welcome the company's participation in at least some of these important fora for dialogue with civil society.
Section 5: Support for Legislation (6 pts max score)		0		
a) Did the company participate in the Multi-stakeholder group of NGOs, companies, and investors to the SEC and sign on to the Group's letters?	Yes = 2 pts, No = 0 pts	0	No comments provided.	The United States is a substantial market for the company, and it therefore has interest in public policy in the U.S. The company's participation in the Multi-stakeholder Group would therefore be welcome, or in individual submissions to the SEC.
b) Did the company issue a statement advocating for legislation in Europe on conflict minerals?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Europe is a substantial market for the company, and it therefore has interest in public policy in Europe. The company's public statements for legislation in Europe would therefore make a difference on this important issue and would be welcome.

Contacted by email twice (February and June 2012), contacted by phone once (June 2012)

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
c) Did the company issue a public statement against the threatened lawsuit against the SEC regulations on conflict minerals by the Chamber of Commerce?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Not to our knowledge. In furtherance of steps on conflict minerals, Enough would welcome a statement against the threatened lawsuit, following statements by Microsoft and GE. IT industry statements on SOPA helped reverse the Chamber's position in 2011.
Scoring	48 pts max	4		
		8%		

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
Section 1: Trace (10 pts max score)				
a) Has the company investigated and come to know precisely which companies refine/smelt the company's supply of 3TG, with third-party verification?	0.5 pts for each metal investigated, 0.5 pts for each metal verified, max 4 pts.	0	No comments provided.	Not to our knowledge.
b) Has the company published the refiners it uses for 3TG?	1 pt for each metal published, max 4 pts.	0	No comments provided.	Not to our knowledge. Enough would welcome publication of the number and/or name of the smelters in the company's supply chain, as some companies have already done. This would aid transparency in the supply chain at the critical chokepoint in the chain for conflict minerals.
c) Has the company visited at least two of its refiners and inquired about the use of conflict minerals within the past year?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Enough would welcome the company's visit to smelters, as this would send important messages about the need for all smelters to go through independent audits, for example through the CFS process.
Section 2: Audit (22 pts max score)		0		
a) Does the company have a stated policy of auditing suppliers of 3TG metals?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	No comments provided.	No points were given, because the company does not yet audit its 1st tier or other suppliers on conflict minerals, particularly with regard to whether they are using CFS compliant smelters. The company also does not have a policy to require all of its suppliers to only source from CFS compliant smelters, once a sufficient number are available. Such a policy would send strong signals to smelters to participate in the CFS program. Enough would welcome such an audit program and requirement, to help ensure that its suppliers are using conflict-free smelters and minerals.
b) Has the company conducted internal audits of the procurement practices of 3TG suppliers down to the level of refiner, at least, within the last year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	No comments provided.	
c) Has the company had third-party audits conducted of 3TG suppliers down to the level of refiner, at least, within the past year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	No comments provided.	
d) Has the company participated in the Extractives Work Group for the EICC-GeSI conflict-free smelter program (CFS)?	Yes = 2 pts, No = 0 pts	0	No comments provided.	

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
e) Has the company provided financial support for auditing for 3TG?	Yes = 4 pts for support >\$100K, 2 pts for support >\$50K, 1 pt for support <\$50K.	0	No comments provided.	
f) Has the company developed at least one verifiably conflict-free product, with independently audited supply chains all the way to the point of extraction?	Yes = 4 pts, No = 0 pts.	0	No comments provided.	
Section 3: Certify (8 pts max score)		0		
a) Has the company made public statements in support of certification?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Not to our knowledge. Enough would welcome such a statement, which would help encourage government and multi-stakeholder action to act more quickly to develop a clean minerals trade in the Great Lakes Region.
b) Does the company have a stated policy of support for certification?	Yes = 2 pts, No = 0 pts	0	No comments provided.	
c) Has the company provided financial support for certification? Participation in the Public Private Alliance (PPA) would count for points; PPA is a step toward certification but not certification, as per the definition: certification as a multi-stakeholder process similar to the Kimberley and/or Forest Stewardship Council processes, which would be an international regime to trace, audit, and certify 3TG metals as being conflict-free.	Yes = 2 pts for support > \$500K, 1.5 pts for support >\$200K, 1 pt for support <\$200K, No = 0 pts	0	No comments provided.	
d) Has the company participated in the process for developing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and did it commit to piloting the guidance?	Yes = 2 pts, No = 0 pts	0	No comments provided.	
Section 4: Stakeholder Engagement (2 pts max score)		0		
a) Did the company meet with the NGO coalition regarding inquiries on conflict minerals?	Yes = 1 pt, No = 0 pt	0	No comments provided.	
b) Has the company held regular communication with NGO coalition regarding conflict minerals (at least bi-monthly)?	Yes = 1 pt, No = 0 pt	0	No comments provided.	No. Nintendo is not a regular participant in the monthly multi-stakeholder calls on conflict minerals, is not part of the PPA, was not part of the Multi-stakeholder group on the SEC, and did not participate in the OECD process. Enough would welcome the company's participation in at least some of these important fora for dialogue with civil society.

Nintendo

Nintendo Corporate Social Responsibility Report 2011
(No mention of conflict minerals)

Contacted by email twice (February and June 2012),
contacted by phone twice (June 2012)

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
Section 5: Support for Legislation (6 pts max score)		0		
a) Did the company participate in the Multi-stakeholder group of NGOs, companies, and investors to the SEC and sign on to the Group's letters?	Yes = 2 pts, No = 0 pts	0	No comments provided.	The United States is a substantial market for the company, and it therefore has interest in public policy in the U.S. The company's participation in the Multi-stakeholder Group would therefore be welcome, or in individual submissions to the SEC.
b) Did the company issue a statement advocating for legislation in Europe on conflict minerals?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Europe is a substantial market for the company, and it therefore has interest in public policy in Europe. The company's public statements for legislation in Europe would therefore make a difference on this important issue and would be welcome.
c) Did the company issue a public statement against the threatened lawsuit against the SEC regulations on conflict minerals by the Chamber of Commerce?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Not to our knowledge. According to OpenSecrets.org, Nintendo spent \$20,000 on lobbying in 2011. In furtherance of steps on conflict minerals, Enough would welcome a statement against the threatened lawsuit, following statements by Microsoft and GE. IT industry statements on SOPA helped reverse the Chamber's position in 2011.
Scoring		48 pts max	0	
Rating %			0%	

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
Section 1: Trace (10 pts max score)				
a) Has the company investigated and come to know precisely which companies refine/smelt the company's supply of 3TG, with third-party verification?	0.5 pts for each metal investigated, 0.5 pts for each metal verified, max 4 pts.	2	"We have sent the questionnaire to all 3TG suppliers. Results are being compiled. Tantalum and tin smelters already mapped in 2008 and 2010, and the information is now being updated. If we identify smelters that are not yet included in CFS, we plan to inform EICC+GeSI. We will be only using CFS validated smelters once more comprehensive smelter lists are available. This has already been communicated to suppliers."	Two points for the investigation. Enough looks forward to the company's third-party verification of the smelters.
b) Has the company published the refiners it uses for 3TG?	1 pt for each metal published, max 4 pts.	0	"No."	Not to our knowledge. Enough would welcome publication of the number and/or name of the smelters in the company's supply chain, as some companies have already done. This would aid transparency in the supply chain at the critical chokepoint in the chain for conflict minerals.
c) Has the company visited at least two of its refiners and inquired about the use of conflict minerals within the past year?	Yes = 2 pts, No = 0 pts	0	"We have participated in two EICC-GeSI CFS pre-audit visits (4 tin smelters) in late 2010."	Enough welcomes Nokia's visits to smelters but would welcome more visits, as this would send important messages about the need for all smelters to go through independent audits, for example through the CFS process. Nokia's visits were not conducted within the past year, so no points were awarded here.
Section 2: Audit (22 pts max score)				

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
a) Does the company have a stated policy of auditing suppliers of 3TG metals?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	4	<p>"Yes. From the Nokia Policy against illegal trade of natural resources: "If we identify a reasonable risk that a supplier is violating our commitments set forth in this policy, we require them to commit to and implement a corrective action plan within a reasonable timeline. Nokia follows up effectiveness of corrective actions and conducts on-site assessments as necessary." http://conversations.nokia.com/2012/02/02/nokia-unveils-policy-on-conflict-minerals/" We have incorporated conflict minerals requirements already earlier into our supplier requirements into two sections. One talks about the guiding policies and the need for suppliers to set and implement a conflict minerals policy of their own. The other requirement about conflict minerals is embedded into sub-supplier management and talks about the due diligence in the supply chain</p> <p>We use our supplier requirements as a base against which we do our supplier assessments and those are in line or go further than EICC Code.</p>	Nokia's supplier audits will incorporate conflict minerals. The company does not have a policy to require all of its suppliers to only source from CFS compliant smelters, once a sufficient number are available. Nokia has a policy to "Once smelter lists are available, suppliers will be requested to procure materials only through validated smelters." If "request" is clarified to mean "required", then the policy would send strong signals to smelters to participate in the CFS program. Enough would welcome such an audit program and requirement, to help ensure that its suppliers are using conflict-free smelters and minerals.
b) Has the company conducted internal audits of the procurement practices of 3TG suppliers down to the level of refiner, at least, within the last year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"We have sent the EICC-GeSI common reporting template to all 3TG suppliers and are currently collecting and analyzing answers."	The audits of first tier suppliers incorporating conflict minerals have not yet begun.
c) Has the company had third-party audits conducted of 3TG suppliers down to the level of refiner, at least, within the past year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"Not as an individual company, but as a GeSI member we are relying on the CFS audit process."	The audits of first tier suppliers incorporating conflict minerals have not yet begun.
d) Has the company participated in the Extractives Work Group for the EICC-GeSI conflict-free smelter program (CFS)?	Yes = 2 pts, No = 0 pts	2	"Yes, Nokia has been one of the companies initiating and developing the CFS program."	Yes
e) Has the company provided financial support for auditing for 3TG?	Yes = 4 pts for support >\$100K, 2 pts for support >\$50K, 1 pt for support <\$50K.	1	"Yes. We are funding the CFS program through GeSI membership and have contributed financially to PPA. Exact amounts are not public information. However, we can say that Nokia's aggregate funding of the CFS program is in the range of above 75000 dollars."	One point was given for EICC-GeSI Working Group contribution, which funds the overall CFS program. Additional points would be given here for participation in the CFS Early Adopters Program, to incentivize smelters to participate in the audits http://solutions-network.org/site-cfs/ We would welcome the company's participation in the project.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
f) Has the company developed at least one verifiably conflict-free product, with independently audited supply chains all the way to the point of extraction?	Yes = 4 pts, No = 0 pts.	0	"Nokia's approach is to ensure that all our products are sustainable and conflict-free. Among other things, we have joined Solutions for Hope and will be accepting conflict-free tantalum from DRC through the program to be used in our products."	Not to our knowledge. Enough would welcome this step, along the line of Intel's commitment to making a fully conflict-free chip in 2013.
Section 3: Certify (8 pts max score)				
a) Has the company made public statements in support of certification?	Yes = 2 pts, No = 0 pts	1	"Yes we have made statements in support of third party validation."	Nokia supports "a responsible minerals trade from the Great Lakes of Africa region." One point was awarded, because the statement is closely related to certification but does not mention support for the certification process, as defined in 3c.
b) Does the company have a stated policy of support for certification?	Yes = 2 pts, No = 0 pts	1	"Certification is not specifically mentioned, but we are in support of third party auditing and verification, and we support initiatives such as PPA and Solutions for Hope which aim for responsible sourcing from the DRC."	See 3a.
c) Has the company provided financial support for certification? Participation in the Public Private Alliance (PPA) would count for points; PPA is a step toward certification but not certification, as per the definition: certification as a multi-stakeholder process similar to the Kimberley and/or Forest Stewardship Council processes, which would be an international regime to trace, audit, and certify 3TG metals as being conflict-free.	Yes = 2 pts for support > \$500K, 1.5 pts for support >\$200K, 1 pt for support <\$200K, No = 0 pts	2	"Yes, our individual contribution to the PPA at the moment is 25000 dollars. We are also contributing through our GeSI membership."	One point for participation in the PPA and one point for participation in Solutions for Hope project. Neither of these are certification processes, but they are steps toward certification, as clarified in the question.
d) Has the company participated in the process for developing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and did it commit to piloting the guidance?	Yes = 2 pts, No = 0 pts	2	"Yes, we have given input for the guidance through GeSI, ITI and independently. We are also actively participating in the OECD pilot."	Good steps from Nokia. Enough would welcome publication of the steps that the company is taking to implement the Guidance on its website.
Section 4: Stakeholder Engagement (2 pts max score)				
a) Did the company meet with the NGO coalition regarding inquiries on conflict minerals?	Yes = 1 pt, No = 0 pt	1	"Yes we have."	Yes.
b) Has the company held regular communication with NGO coalition regarding conflict minerals (at least bi-monthly)?	Yes = 1 pt, No = 0 pt	1	"We have been in regular communication with NGOs and other stakeholders on a fairly regular basis."	Yes, in several multi-stakeholder fora.
Section 5: Support for Legislation (6 pts max score)				

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
a) Did the company participate in the Multi-stakeholder group of NGOs, companies, and investors to the SEC and sign on to the Group's letters?	Yes = 2 pts, No = 0 pts	0	"No."	The United States is a substantial market for the company, and it therefore has interest in public policy in the U.S. The company's participation in the Multi-stakeholder Group would therefore be welcome, or in individual submissions to the SEC.
b) Did the company issue a statement advocating for legislation in Europe on conflict minerals?	Yes = 2 pts, No = 0 pts	0	"We have a positive stance towards legislation in Europe for trade in raw materials from conflict zones. We have been in talks with various law makers at EU institutions, indicating that a potential law proposal would be welcomed, but that it really should be carefully crafted in order to be effective."	This does not qualify as advocacy for legislation in Europe on conflict minerals, which should include a compliance regime.
c) Did the company issue a public statement against the threatened lawsuit against the SEC regulations on conflict minerals by the Chamber of Commerce?	Yes = 2 pts, No = 0 pts	0	"No."	Not to our knowledge. According to OpenSecrets.org, Nokia spent \$660,000 on lobbying in 2011. In furtherance of steps on conflict minerals, Enough would welcome a statement against the threatened lawsuit, following statements by Microsoft and GE. IT industry statements on SOPA helped reverse the Chamber's position in 2011.
Scoring	48 pts max	17		
Rating %		35%		

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
Section 1: Trace (10 pts max score)				
a) Has the company investigated and come to know precisely which companies refine/smelt the company's supply of 3TG, with third-party verification?	0.5 pts for each metal investigated, 0.5 pts for each metal verified, max 4 pts.	2	<p>"Panasonic has implemented a pilot program to identify which companies supply 3TG. Our program, begun in September 2011, has identified the following smelters/refiners: 17 for tin, 11 for tungsten, 9 for tantalum, and 30 for gold. The survey is still in progress, and this number is expected to increase."</p> <p>"We have contacted 1,000 suppliers globally. Over 90% of suppliers in Japan and 60% overseas responded within 2-month survey period."</p>	Two points for the investigation. Enough looks forward to the company's third-party verification of the smelters.
b) Has the company published the refiners it uses for 3TG?	1 pt for each metal published, max 4 pts.	2	<p>"In the future, Panasonic plans to work through our industry groups that will publicize the 3TG smelter/refiner lists of member companies."</p> <p>"As part of the OECD pilot initiatives, we have provided smelters' names and locations we have identified to the OECD pilot secretariat."</p>	Panasonic identified 67 total smelters but did not publish the names. Therefore half the points were awarded. Enough would welcome the company's publication of the number and/or names of its smelters on its website.
c) Has the company visited at least two of its refiners and inquired about the use of conflict minerals within the past year?	Yes = 2 pts, No = 0 pts	1	<p>"We are working closely with our primary provider of solder, on the issue of tin. The provider has visited all of its smelters (12 locations) and inquired about their use of conflict minerals. For gold, Panasonic is developing a schedule to visit the smelters/refiners and inquire about their use of conflict minerals."</p> <p>"We have visited gold smelter/refiners and inquired about the use of conflict minerals. Also, as one of the co-chairs of the Responsible Minerals Trade Working Group of JEITA, we have started visiting 3TG smelting industry associations to ask for their cooperation towards our due diligence initiatives."</p>	One point was awarded because the company worked with a supplier to visit 12 smelters.
Section 2: Audit (22 pts max score)				

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
a) Does the company have a stated policy of auditing suppliers of 3TG metals?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"We are conducting a risk analysis as part of our pilot program. A decision on the necessity for policy changes going forward in 2012 will in part be based on our internal review and our findings from our ongoing pilot program now underway."	No points were given, because the company does not yet audit its 1st tier or other suppliers on conflict minerals, particularly with regard to whether they are using CFS compliant smelters. The company also does not have a policy to require all of its suppliers to only source from CFS compliant smelters, once a sufficient number are available. Such a policy would send strong signals to smelters to participate in the CFS program. Enough would welcome such an audit program and requirement, to help ensure that its suppliers are using conflict-free smelters and minerals.
b) Has the company conducted internal audits of the procurement practices of 3TG suppliers down to the level of refiner, at least, within the last year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"Based on the results of the survey conducted as part of the pilot program, we will look into the necessity of providing internal audits and the methods of doing so. Pilot project survey results are currently being verified through sampling investigations."	See Question 2a.
c) Has the company had third-party audits conducted of 3TG suppliers down to the level of refiner, at least, within the past year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"No."	See Question 2a.
d) Has the company participated in the Extractives Work Group for the EICC-GeSI conflict-free smelter program (CFS)?	Yes = 2 pts, No = 0 pts	2	No comments provided.	The company joined the CFS through the Japanese electronics association JEITA in 2011.
e) Has the company provided financial support for auditing for 3TG?	Yes = 4 pts for support >\$100K, 2 pts for support >\$50K, 1 pt for support <\$50K.	0	"No."	Not to our knowledge.
f) Has the company developed at least one verifiably conflict-free product, with independently audited supply chains all the way to the point of extraction?	Yes = 4 pts, No = 0 pts.	0	"Our future goal will be to offer conflict free models, to the extent possible, across our product lines. For this goal, we are working to identify 3TG smelters/refiners not only through our own procurement activities, but also through our industry groups."	Not to our knowledge. Enough would welcome this step, along the line of Intel's commitment to making a fully conflict-free chip in 2013.
Section 3: Certify (8 pts max score)				

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
a) Has the company made public statements in support of certification?	Yes = 2 pts, No = 0 pts	1	http://panasonic.net/csr/info/20120515_ppa.html	Panasonic "supports the establishment of validated, traceable mineral supply chains, and... discuss and collaborate on initiatives to achieve a sustainable, responsible minerals trade in the region." This is closely linked to certification but is not exactly the same as the definition of certification as defined in 3a, therefore partial credit was awarded.
b) Does the company have a stated policy of support for certification?	Yes = 2 pts, No = 0 pts	1	"Panasonic is currently reviewing its options to publicly state policy of support for certification."	See 3a
c) Has the company provided financial support for certification? Participation in the Public Private Alliance (PPA) would count for points: PPA is a step toward certification but not certification, as per the definition: certification as a multi-stakeholder process similar to the Kimberley and/or Forest Stewardship Council processes, which would be an international regime to trace, audit, and certify 3TG metals as being conflict-free.	Yes = 2 pts for support > \$500K, 1.5 pts for support >\$200K, 1 pt for support <\$200K, No = 0 pts	1	"Panasonic is in the process of joining the Public Private Alliance (PPA) and expect our membership to be finalized this spring. Our membership will be in the category of under \$200,000 financial commitment."	Panasonic applied to be a PPA member in May 2012. If accepted, the minimum company contribution is \$25,000. Together with the company's EICC contribution that helps fund the PPA, this would still add up to one point.
d) Has the company participated in the process for developing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and did it commit to piloting the guidance?	Yes = 2 pts, No = 0 pts	2	"Yes, we are committed. Please see the following company statement at http://panasonic.co.jp/corp/news/official.data/data.dir/en110930-3/en110930-3.html "	Good steps by Panasonic. Enough would welcome publication of the steps that the company is taking to implement the Guidance on its website.
Section 4: Stakeholder Engagement (2 pts max score)				
a) Did the company meet with the NGO coalition regarding inquiries on conflict minerals?	Yes = 1 pt, No = 0 pt	1	"Panasonic representatives met with Mr. Darren Fenwick in December 2011."	Yes.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
b) Has the company held regular communication with NGO coalition regarding conflict minerals (at least bi-monthly)?	Yes = 1 pt, No = 0 pt	1	<p>"Panasonic participated once in a multistakeholder call from the US, but the time differential necessitates participation in the middle of the night Japan time, and so it is difficult to continue. Recently, our colleagues in US have signed up for this call, and are planning to participate for the future. In Japan we are supporting efforts to create educational materials regarding conflict minerals made by NPO, and we are participating in meetings on this topic one or more times every two months. In addition, we are planning to attend a roundtable meeting held by the environmental NPO A SEED JAPAN on February 28, in which Mr. Aaron Hall will attend as an observer."</p> <p>"We are continuing to join the Interim Governance Committee of OECD pilot every second week."</p>	Enough welcomes Panasonic USA's regular participation, starting in recent months, of the multi-stakeholder monthly calls run by the Responsible Sourcing Network, which are important fora for civil society dialogue.
Section 5: Support for Legislation (6 pts max score)				
a) Did the company participate in the Multi-stakeholder group of NGOs, companies, and investors to the SEC and sign on to the Group's letters?	Yes = 2 pts, No = 0 pts	0	"No."	The United States is a substantial market for the company, and it therefore has interest in public policy in the U.S. The company's participation in the Multi-stakeholder Group would therefore be welcome, or in individual submissions to the SEC.
b) Did the company issue a statement advocating for legislation in Europe on conflict minerals?	Yes = 2 pts, No = 0 pts	0	"No."	Europe is a substantial market for the company, and it therefore has interest in public policy in Europe. The company's public statements for legislation in Europe would therefore make a difference on this important issue and would be welcome.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
<p>c) Did the company issue a public statement against the threatened lawsuit against the SEC regulations on conflict minerals by the Chamber of Commerce?</p>	<p>Yes = 2 pts, No = 0 pts</p>	<p>2</p>	<p>Statement made to Business & Human Rights Resource Centre: "Panasonic is not a member of the U.S. Chamber of Commerce or of the National Association of Manufacturers, so we did not and do not participate in the formulation of their policies or submissions with regard to the conflict minerals provisions of Dodd-Frank (Section 1502); and we oppose any effort to overturn the law. Panasonic is pleased that the Securities and Exchange Commission (SEC) has now announced that it plans to act in August to adopt the regulations to implement the requirements of Section 1502."</p> <p>"We have responded to the Business & Human Rights Resource Centre regarding this issue on July 10th, 2012. http://www.business-humanrights.org/Documents/GlobalWitnessDoddFrank."</p>	<p>Statement made July 10th.</p>
<p>Scoring</p>	<p>48 pts max</p>	<p>16</p>		
<p>Rating %</p>		<p>33%</p>		

Scorecard Criteria	Scoring Allocation	Score	Comments	Justification
Section 1: Trace (10 pts max score)				
a) Has the company investigated and come to know precisely which companies refine/smelt the company's supply of 3TG, with third-party verification?	0.5 pts for each metal investigated, 0.5 pts for each metal verified, max 4 pts.	2	"Through supply chain investigations we have identified over 400 smelters. We have conducted the investigation for all 4 metals, and also identified smelters for each of the metals. The identified smelters are being invited to join the CFS audit program. Progress of the third party verification via the CFS audit program is published on www.conflictreesmelter.org ."	Two points for the investigation. Enough looks forward to the company's third-party verification of the smelters. Philips says it plans to complete the verification of the number of smelters by the end of 2012, and invite them to the CFS.
b) Has the company published the refiners it uses for 3TG?	1 pt for each metal published, max 4 pts.	2	"At this moment we focus on mobilizing smelters and requesting them to participate in the CFS audit program. The biggest challenge here is to increase smelter uptake for the CFS audits. EICC-GeSI is publishing a 'white list' of conflict-free smelters, which is intended to be an encouragement for smelters to participate in the CFS program. Over time these conflict-free smelter lists will grow for all metals; there are no white lists yet for tin, tungsten and gold. At this moment in time we do not intend to publish a black list of smelters that have not been audited yet. We believe that publishing a black list of smelters now will work counterproductive and have a negative impact on the smelter update."	Philips found 113 smelters, which is a positive step towards transparency. Full credit will be given if Philips publishes the names of the smelters.

Scorecard Criteria	Scoring Allocation	Score	Comments	Justification
c) Has the company visited at least two of its refiners and inquired about the use of conflict minerals within the past year?	Yes = 2 pts, No = 0 pts	2	"Yes. Next to several smelter visits we also wrote letters to encourage smelters to join the CFS audit program. However, the 3TG industry (organization) must actually take accountability here to increase pressure on their smelters to have them validated as conflict free. Having electronics industry drive this effort and take accountability for smelter audits will enable the metal industry to refrain from taking their responsibility."	Yes. Good step from Philips.
Section 2: Audit (22 pts max score)				
a) Does the company have a stated policy of auditing suppliers of 3TG metals?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	5	"In the updated EICC Code a new section on conflict minerals will be included, requiring due diligence from all EICC member companies and their suppliers. Philips will adopt the new EICC Code and make it part of the General Purchasing Agreements with suppliers. Philips has published a position paper, describing our goal of enabling legitimate trade from the region to enable development of local economies."	Yes. The company will use the EICC Code to audit its suppliers, which will include conflict minerals in 2012. Additionally, one point was awarded because "As DR Congo conflict-free smelters are validated through this program, Philips plans to direct our suppliers to use these smelters." , see http://www.philips.com/about/company/businesses/suppliers/conflict_minerals.page Enough would welcome enforcement of this policy through audits of its 1st tier or other suppliers with regard to whether they are using CFS compliant smelters. Enforcement of this policy could begin with tantalum, where a majority of tantalum smelters have been certified.
b) Has the company conducted internal audits of the procurement practices of 3TG suppliers down to the level of refiner, at least, within the last year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"We are implementing a due diligence process that meets the requirements of the OECD guidance. We follow the recommendation of the OECD guidance to organize on an industry level for independent third-party smelter audits via the CFS program."	The audits of first tier suppliers incorporating conflict minerals have not yet begun.

Scorecard Criteria	Scoring Allocation	Score	Comments	Justification
c) Has the company had third-party audits conducted of 3TG suppliers down to the level of refiner, at least, within the past year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"We are implementing a due diligence process that meets the requirements of the OECD guidance. We follow the recommendation of the OECD guidance to organize on an industry level for independent third-party smelter audits via the CFS program."	The audits of first tier suppliers incorporating conflict minerals have not yet begun.
d) Has the company participated in the Extractives Work Group for the EICC-GeSI conflict-free smelter program (CFS)?	Yes = 2 pts, No = 0 pts	2	"Yes. We are actively involved in the EICC-GeSI Extractives workgroup as we are convinced that industry collaboration is the key to create leverage over deeper levels of the supply chain where the minerals are traded and processed. Philips is active in different relevant taskforces that fall under the Extractives workgroup and we extend our efforts to tungsten, tin and gold."	Yes.
e) Has the company provided financial support for auditing for 3TG?	Yes = 4 pts for support >\$100K, 2 pts for support >\$50K, 1 pt for support <\$50K.	1	"As part of our due diligence efforts we are spending over 60,000 Euro in 2012 on external resources to perform supply chain investigations to determine the country of origin and identify the smelters in our supply chain. On top of that we have allocated internal resources to this topic. Furthermore we are financially supporting the CFS program via our EICC membership fees."	Funding for supply chain investigations is a positive step, but this question specifically deals with audits. One point was given for EICC Working Group contribution, which funds the overall CFS program. Additional points would be given here for participation in the CFS Early Adopters Program, to incentivize smelters to participate in the audits http://solutions-network.org/site-cfs/ We would welcome the company's participation in the project. Supply chain investigations are covered under Question 1.
f) Has the company developed at least one verifiably conflict-free product, with independently audited supply chains all the way to the point of extraction?	Yes = 4 pts, No = 0 pts.	0	"No. Virtually all Philips products contain some small quantity of tin in their solder, plus often also one or more of the other three metals. As none of the tin smelters has passed a conflict-free smelter audit to date, it is impossible to identify any verifiably conflict-free electronic product, irrespective of the brand."	Along the lines of Intel's commitment to make a fully conflict-free chip in 2013, Enough would welcome Philips' manufacturing of a conflict-free product.
Section 3: Certify (8 pts max score)				

Scorecard Criteria	Scoring Allocation	Score	Comments	Justification
a) Has the company made public statements in support of certification?	Yes = 2 pts, No = 0 pts	2	"To the best of our knowledge there are no international certification regimes in place or developed for certification of 3TG metals (based on the provided definition of certification). A multi-stakeholder process with involvement of national and international governments seems an appropriate process to deal with the complexity of the issue and to hold different stakeholders accountable for their contribution to the solution. "When talking about 3TG certification it is important to recognize some fundamental differences between the metals and the diamonds and timber products and industry. Contrary metals, diamonds and timber do not undergo much processing before they can be sold as an end product, resulting is a shorter supply chain with far less actors. Diamonds and timber is the main ingredient of the associated end-product, and represent the largest cost component of the end-product. For metals this is a very different situation, where 3TG metals are used in small quantities per end-product, and the cost of the 3TG metals is just a fraction of the total production costs for electronic products.""	Yes. See company comment. Enough would welcome Philips' participation in the PPA.
b) Does the company have a stated policy of support for certification?	Yes = 2 pts, No = 0 pts	2	See 3a	See 3a

Scorecard Criteria	Scoring Allocation	Score	Comments	Justification
c) Has the company provided financial support for certification? Participation in the Public Private Alliance (PPA) would count for points; PPA is a step toward certification but not certification, as per the definition: certification as a multi-stakeholder process similar to the Kimberley and/or Forest Stewardship Council processes, which would be an international regime to trace, audit, and certify 3TG metals as being conflict-free.	Yes = 2 pts for support > \$500K, 1.5 pts for support >\$200K, 1 pt for support <\$200K, No = 0 pts	1	<p>"As far as I know the goals of the PPA do not include the creation of an international certification regime. Via our EICC membership fee we have contributed to the PPA. We have not donated as an individual end user company as we believe this is something to be done on an industry level.</p> <p>Through our supply chain investigations we have not been able to establish a link between a Philips product and a mine in the DRC region; none of our suppliers indicated that they source from the region.</p> <p>We feel it is inappropriate to donate money to local mining development if we cannot link it to our end products. It would be more appropriate for mining companies doing business in the DRC region to contribute to these type of projects, as well as other industry organizations that are heavy users of these metals."</p>	One point was given for the company's contribution to the EICC contribution to the PPA. However, adding the company's name and contribution to the PPA would add significantly to the initiative, and we would welcome the company's individual participation in the PPA and other processes related to certification.
d) Has the company participated in the process for developing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and did it commit to piloting the guidance? Section 4: Stakeholder Engagement (2 pts max score)	Yes = 2 pts, No = 0 pts	2	"Yes, and we as Philips are participating in the downstream pilot."	Yes, and this is a positive step that contributes to an industry-wide solution. Enough would welcome publication of the steps that the company is taking to implement the Guidance on its website.
a) Did the company meet with the NGO coalition regarding inquiries on conflict minerals?	Yes = 1 pt, No = 0 pt	1	"Yes, I believe we have had an open dialogue between Enough and Philips and exchanged our views during several calls and meetings that have taken place. We are also continuing our dialogue with other NGOs including local Congolese NGOs."	Yes.
b) Has the company held regular communication with NGO coalition regarding conflict minerals (at least bi-monthly)?	Yes = 1 pt, No = 0 pt	1	"I do think we have had a regular communication, with frequency based on relevancy instead of timing. Should Enough wish to increase the frequency of the communication, please do let us know."	Yes, Philips regularly participates in multi-stakeholder fora and in dialogue with NGOs on the issue.
Section 5: Support for Legislation (6 pts max score)				

Scorecard Criteria	Scoring Allocation	Score	Comments	Justification
a) Did the company participate in the Multi-stakeholder group of NGOs, companies, and investors to the SEC and sign on to the Group's letters?	Yes = 2 pts, No = 0 pts	0	"Yes."	The United States is a substantial market for the company, and it therefore has interest in public policy in the U.S. The company's participation in the Multi-stakeholder Group would therefore be welcome, or in individual submissions to the SEC. No points were awarded because Philips was not one of the signatories to the multi-stakeholder group letters to the SEC, listed at http://www.sec.gov/comments/s7-40-10/s74010-152.pdf
b) Did the company issue a statement advocating for legislation in Europe on conflict minerals?	Yes = 2 pts, No = 0 pts	0	<p>"Philips has discussed the issue with a number of Dutch and European politicians and encouraged them to provide political guidance as to how industry and governments can jointly address the complex issue of Conflict Minerals.</p> <p>As a European based electronics company we tend to focus our political engagement on this issue in Europe and not the US. We participated in the European roundtable on conflict minerals organized in May 2011 by MEP Judith Sargentini.</p> <p>We are currently investigating with the Dutch government the possibilities for setting up a pilot project in the DRC with multiple actors along the supply chain from mine to end-user, to enable legitimate trade from a conflict free mine in Eastern Congo.</p> <p>We also engage with NGOs in Europe on this matter, including SOMO, Good Electronics, NIZA, and Greenpeace."</p>	No public statements issued advocating for legislation in Europe, thus no points were given. However, Philips deserves mention for having met the EU Commission and EU politicians on the issue of conflict minerals. However, the company's position on legislation is vague. It did not make public statements on the need for European legislation or what the legislation should entail. "Philips is in further dialogue with NGOs and the Dutch and European policymakers to discuss the role government and other institutions can play to effectively address the issue of conflict minerals." This does not indicate advocacy for legislation.

Scorecard Criteria	Scoring Allocation	Score	Comments	Justification
	Yes = 2 pts, No = 0 pts	0	"No, we find it inappropriate to make a public statement on a potential action by the Chamber of Commerce. We however do not support it."	Not to our knowledge. According to OpenSecrets.org, Philips spent \$1,790,000 on lobbying in 2011. In furtherance of steps on conflict minerals, Enough would welcome a statement against the threatened lawsuit, following statements by Microsoft and GE. IT industry statements on SOPA helped reverse the Chamber's position in 2011.
Scoring	48 pts max	23		
Rating %		48%		

*Philips is a member of EICC

Scorecard Criteria	Scoring Allocation	Score	Comments	Justification
Section 1: Trace (10 pts max score)				
a) Has the company investigated and come to know precisely which companies refine/smelt the company's supply of 3TG, with third-party verification?	0.5 pts for each metal investigated, 0.5 pts for each metal verified, max 4 pts.	2	"RIM has sent requests to all of our identified suppliers that provide parts used in our company's products to disclose, using the Electronics Industry Citizenship Coalition (EICC) and Global e-Sustainability Initiative (GeSI) due diligence template, the smelters/processors of 3TG used within those parts. As of the time of this response, approximately half of RIM's suppliers have provided data."	Two points for the investigation, which identified 95% of smelters, according to the company. RIM is learning how to audit the statements of suppliers through the EICC working group on this issue. Enough looks forward to the company's third-party verification of the smelters.
b) Has the company published the refiners it uses for 3TG?	1 pt for each metal published, max 4 pts.	0	"As part of our ongoing work with the EICC and GeSI Extractives Work Group, RIM plans to share in confidence a list of smelters/processors identified by our suppliers with the EICC and GeSI Extractives Work Group in order to ensure the smelters/processors are included in the EICC and GeSI Conflict Free Smelter (CFS) Program."	Not to our knowledge. Enough would welcome publication of the number and/or name of the smelters in the company's supply chain, as some companies have already done. This would aid transparency in the supply chain at the critical chokepoint in the chain for conflict minerals.
c) Has the company visited at least two of its refiners and inquired about the use of conflict minerals within the past year?	Yes = 2 pts, No = 0 pts	2	"In support of the CFS program, RIM team members have conducted visits at two smelters/processors identified by our suppliers within the past year to inquire about sourcing practices related to 3TG and to help facilitate the CFS audit process."	Yes. Good step from RIM.
Section 2: Audit (22 pts max score)				

Scorecard Criteria	Scoring Allocation	Score	Comments	Justification
a) Does the company have a stated policy of auditing suppliers of 3TG metals?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	4	"In early 2012, RIM adopted our Responsible Minerals Policy, which is consistent with our existing Supplier Code of Conduct and the OECD Due Dilligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. RIM believes that a risk-based supplier assessment process is an appropriate part of a conflict minerals due dilligence program. The RIM Responsible Minerals Policy is available on our website at: http://www.rim.com/investors/pdf/RIM_Responsible_Minerals_Policy.pdf The RIM Supplier Code of Conduct is available on our website at: http://www.rim.com/investors/pdf/RIM%20Supplier%20Code%20of%20Conduct%201011%20cl.pdf " RIM is currently updating this code to include conflict minerals. The EICC Validated Audit Process will also include high-level conflict minerals questions, in order for companies to then audit first tier suppliers more deeply on conflict minerals.	Yes. RIM has a policy to audit its 1st tier suppliers on the basis of its Responsible Minerals Policy, which includes provisions on conflict minerals. However, because the company does not yet audit with regard to whether they are using CFS compliant smelters. The company also does not have a policy to require all of its suppliers to only source from CFS compliant smelters, once a sufficient number are available. Such a policy would send strong signals to smelters to participate in the CFS program. Enough would welcome such an audit program and requirement, to help ensure that its suppliers are using conflict-free smelters and minerals. RIM has also sent letters to smelters to urge them to participate in the CFS process, a positive step.
b) Has the company conducted internal audits of the procurement practices of 3TG suppliers down to the level of refiner, at least, within the last year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"RIM has sent requests to all of our identified suppliers that provide parts used in our companies products to disclose using the EICC and GeSI due dilligence template the smelters/processors of 3TG used within those parts. As of the time of this response, more than one third of RIM's suppliers have provided data."	The audits of first tier suppliers incorporating conflict minerals have not yet begun.
c) Has the company had third-party audits conducted of 3TG suppliers down to the level of refiner, at least, within the past year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"Some tantalum smelters/processors within RIM's supply chain have been audited through the EICC and GeSI CFS program within the past year."	The audits of first tier suppliers incorporating conflict minerals have not yet begun.
d) Has the company participated in the Extractives Work Group for the EICC-GeSI conflict-free smelter program (CFS)?	Yes = 2 pts, No = 0 pts	2	"RIM is supportive of the EICC and GeSI Extractives Work Group activities. RIM employees are actively engaged as members of the CFS Audit Review Committee, CFS Sub-team, and as the Chair of the Due Dilligence Sub-team."	RIM also co-chairs two EICC subgroups on this issue.

Scorecard Criteria	Scoring Allocation	Score	Comments	Justification
e) Has the company provided financial support for auditing for 3TG?	Yes = 4 pts for support >\$100K, 2 pts for support >\$50K, 1 pt for support <\$50K.	1	"Through dues paid to both the EICC and GeSI organizations, RIM has helped fund the development of the CFS audit program. RIM has also provided sponsorship to the International Tin Research Institute (ITRI) for a pilot certification program for legally mined tin originating from the DRC. In addition, RIM is a participant in the Public Private Alliance (PPA). Our financial contributions through these efforts are estimated to be in excess of USD\$50,000."	One point was given for EICC Working Group contribution, which funds the overall CFS program. Additional points would be given here for participation in the CFS Early Adopters Program, to incentivize smelters to participate in the audits http://solutions-network.org/site-cfs/ We would welcome the company's participation in the project. ITRI is an industry bag-and-tag system that is not auditing. PPA contributions are covered under Question 3.
f) Has the company developed at least one verifiably conflict-free product, with independently audited supply chains all the way to the point of extraction?	Yes = 4 pts, No = 0 pts.	0	"As industry efforts regarding verification, including the CFS program, are ongoing, we are not aware of any electronics manufacturer that has developed a verifiably conflict-free product with independently audited supply chains all the way to the point of extraction."	Not to our knowledge. Enough would welcome this step, along the line of Intel's commitment to making a fully conflict-free chip in 2013.
Section 3: Certify (8 pts max score)				
a) Has the company made public statements in support of certification?	Yes = 2 pts, No = 0 pts	2	"RIM is part of EICC and GeSI Extractives Work Group, which supports the development of a verifiable certification system that can document supply chain transactions for minerals used in electronics. In addition, one of the key objectives of the PPA, in which RIM is a participant, is to support the establishment of an in-region certification system."	RIM went above and beyond to advocate for a certification process with US government, meeting with senior US government officials to call for improved implementation of certification process in central Africa.
b) Does the company have a stated policy of support for certification?	Yes = 2 pts, No = 0 pts	2	"Through its support of the PPA, RIM is an advocate of in-region certification. RIM has also adopted a Responsible Minerals Policy, which is available on our website."	See 3a
c) Has the company provided financial support for certification? Participation in the Public Private Alliance (PPA) would count for points; PPA is a step toward certification but not certification, as per the definition: certification as a multi-stakeholder process similar to the Kimberley and/or Forest Stewardship Council processes, which would be an international regime to trace, audit, and certify 3TG metals as being conflict-free.	Yes = 2 pts for support > \$500K, 1.5 pts for support >\$200K, 1 pt for support <\$200K, No = 0 pts	2	"RIM has provided sponsorship to the ITRI for a pilot certification program for legally mined tin originating from the DRC and is also a participant in the PPA."	One point for participation in the PPA and one point for participation in Solutions for Hope project. Neither of these are certification processes, but they are steps toward certification, as clarified in the question.

Scorecard Criteria	Scoring Allocation	Score	Comments	Justification
d) Has the company participated in the process for developing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and did it commit to piloting the guidance?	Yes = 2 pts, No = 0 pts	1	"Through our active involvement in the EICC and GeSI Extractives Work Group, RIM has helped to shape the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. RIM is a committed participant in the pilot of the guidance to help identify best practices in its implementation."	The company participated in the OECD meetings to develop the Guidance but has not yet agreed to pilot the Guidance. Enough would welcome the company's piloting of the Guidance and publication of its due diligence.
Section 4: Stakeholder Engagement (2 pts max score)				
a) Did the company meet with the NGO coalition regarding inquiries on conflict minerals?	Yes = 1 pt, No = 0 pt	1	"RIM has maintained an open dialogue with Enough coalition members, during industry events and through individual conversations."	Yes.
b) Has the company held regular communication with NGO coalition regarding conflict minerals (at least bi-monthly)?	Yes = 1 pt, No = 0 pt	1	"RIM welcomes individual dialogue with Enough coalition members, based on specific requests from such members."	Yes, regular participant in multi-stakeholder fora.
Section 5: Support for Legislation (6 pts max score)				
a) Did the company participate in the Multi-stakeholder group of NGOs, companies, and investors to the SEC and sign on to the Group's letters?	Yes = 2 pts, No = 0 pts	0	"No. However, RIM is a supporter of multifaceted legislative approaches addressing the conflict minerals issue to help provide the industry with greater certainty that our suppliers are sourcing from conflict-free smelters/processors."	The United States is a substantial market for the company, and it therefore has interest in public policy in the U.S. The company's participation in the Multi-stakeholder Group would therefore be welcome, or in individual submissions to the SEC.
b) Did the company issue a statement advocating for legislation in Europe on conflict minerals?	Yes = 2 pts, No = 0 pts	0	"No. However, RIM is a supporter of multifaceted legislative approaches addressing the conflict minerals issue to help provide the industry with greater certainty that our suppliers are sourcing from conflict-free smelters/processors."	Europe is a substantial market for the company, and it therefore has interest in public policy in Europe. The company's public statements for legislation in Europe would therefore make a difference on this important issue and would be welcome.
c) Did the company issue a public statement against the threatened lawsuit against the SEC regulations on conflict minerals by the Chamber of Commerce?	Yes = 2 pts, No = 0 pts	0	"No. However, RIM is a supporter of multifaceted legislative approaches addressing the conflict minerals issue to help provide the industry with greater certainty that our suppliers are sourcing from conflict-free smelters/processors."	Not to our knowledge. According to OpenSecrets.org, RIM spent \$3,316,000 on lobbying in 2011. In furtherance of steps on conflict minerals, Enough would welcome a statement against the threatened lawsuit, following statements by Microsoft and GE. IT industry statements on SOPA helped reverse the Chamber's position in 2011.
Scoring		48 pts max	20	
			42%	

*RIM is a member of GeSI and EICC

Scorecard Criteria	Scoring Allocation	Score	Comments	Justification
Section 1: Trace (10 pts max score)				
a) Has the company investigated and come to know precisely which companies refine/smelt the company's supply of 3TG, with third-party verification?	0.5 pts for each metal investigated, 0.5 pts for each metal verified, max 4 pts.	2	"Samsung Electronics investigated its 1st tier suppliers' use of 3TG and smelters through EICC-GeSI Due Diligence Template. The results will be published on our website and 2012 Sustainability Report. http://www.samsung.com/us/aboutsamsung/sustainability/conflictminerals/conflictminerals.html	The company surveyed all of its 1st tier suppliers for the first time. 2000 1st tier suppliers. Got responses from 85% of suppliers. 40 smelters were listed in 2011 survey. Most answers unknown. Two points were given because the EICC template tool that was used included questions on which smelters the company was using.
b) Has the company published the refiners it uses for 3TG?	1 pt for each metal published, max 4 pts.	2	"Samsung Electronics completed the 1st round of investigation about 3TG extracted from the DRC in December 2011. The smelter list investigated by this survey was opened to customers and EICC Extractives W/G. The other information about conflict minerals will be included in 2012 Sustainability report in May." "As I mentioned that Samsung Electronics has shared the 3TG smelters with BSR and EICC. We thought this activity is enough. But we accepted your suggestion, We've published the smelter list for 3TG in the 2012 sustainability report. (Please refer to the page 48) Also we will publish the 3TG smelters on our website."	Yes. Samsung published that it uses 36 smelters in its supply chain in its 2012 Sustainability Report and on its website at http://www.samsung.com/us/aboutsamsung/sustainability/conflictminerals/conflictminerals.html This publishing is a welcome step. However, the list of smelters seems very low, given Samsung's size and number of products. Enough would welcome verification and further investigation of the number of smelters.
c) Has the company visited at least two of its refiners and inquired about the use of conflict minerals within the past year?	Yes = 2 pts, No = 0 pts	0	"No."	Enough would welcome the company's visit to smelters, as this would send important messages about the need for all smelters to go through independent audits, for example through the CFS process.
Section 2: Audit (22 pts max score)				

Scorecard Criteria	Scoring Allocation	Score	Comments	Justification
a) Does the company have a stated policy of auditing suppliers of 3TG metals?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	4	<p>"Samsung Electronics established a conflict minerals policy that prohibits the use of 3TG from conflict regions. http://www.samsung.com/us/aboutsamsung/sustainability/conflictminerals/conflictminerals.html Samsung provided training to CEO's of 1st and 2nd tier suppliers for its new conflict minerals policy. Samsung also asked its suppliers to sign compliance letters and to complete the EICC-GeSI DD template in its 2011 Supplier Evaluation. Currently, Samsung is revising its procurement contracts to include conflict minerals tracing and on-site audit (which will be confirmed when it's needed)."</p> <p>"Please refer page 48 in Sustainability report 2012 And, according to the recently revised EICC Code of Conduct, version 4.0, Samsung will audit our suppliers about the usage of conflict minerals and smelters in addition to Human rights, Labor, Environment and safety. We've informed that Samsung Electronics will conduct audit according to EICC CoC to our suppliers through our supplier support management system."</p>	Yes. The company will use the EICC Code to audit its suppliers, which will include conflict minerals in 2012. However, the company does not yet audit its 1st tier or other suppliers with regard to whether they are using CFS compliant smelters. Enough would welcome such an audit program. A requirement for suppliers to use only CFS compliant smelters would be possible now, and enforcement of this policy could begin with tantalum, where a majority of tantalum smelters have been certified.
b) Has the company conducted internal audits of the procurement practices of 3TG suppliers down to the level of refiner, at least, within the last year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	<p>"Samsung has sent the EICC and GeSI Common Reporting Tool to its 1st tier suppliers."</p> <p>"We only conducted document audit to our 1st-tier suppliers But the results are not published because it is strictly confidential information. I can only tell you the total number. The results are below Not use: 441 suppliers Not Identified: 133 suppliers."</p>	The audits of first tier suppliers incorporating conflict minerals have not yet begun.
c) Has the company had third-party audits conducted of 3TG suppliers down to the level of refiner, at least, within the past year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"No."	The audits of first tier suppliers incorporating conflict minerals have not yet begun.
d) Has the company participated in the Extractives Work Group for the EICC-GeSI conflict-free smelter program (CFS)?	Yes = 2 pts, No = 0 pts	2	"Samsung participates in the EICC Extractives WG as well as smelter validation program for Tantalum."	Yes

Scorecard Criteria	Scoring Allocation	Score	Comments	Justification
e) Has the company provided financial support for auditing for 3TG?	Yes = 4 pts for support >\$100K, 2 pts for support >\$50K, 1 pt for support <\$50K.	1	"Samsung has paid its EICC membership dues. Some of its dues are used for EICC conflict free smelter program."	One point was given for EICC Working Group contribution, which funds the overall CFS program. Additional points would be given here for participation in the CFS Early Adopters Program, to incentivize smelters to participate in the audits http://solutions-network.org/site-cfs/ We would welcome the company's participation in the project.
f) Has the company developed at least one verifiably conflict-free product, with independently audited supply chains all the way to the point of extraction?	Yes = 4 pts, No = 0 pts.	0	"To verify conflict free for all suppliers is very difficult, so it would take a long time to complete. However, Samsung will try to increase the ratio of conflict free products along with our conflict free policy. "	Not to our knowledge. Enough would welcome this step, along the line of Intel's commitment to making a fully conflict-free chip in 2013.
Section 3: Certify (8 pts max score)				
a) Has the company made public statements in support of certification?	Yes = 2 pts, No = 0 pts	0	"Samsung Electronics conflict minerals policy is available on its website and includes support for the EICC-GeSI Conflict Free Smelter certification program."	Support for the CFS is helpful but is not the same as a certification process for a clean minerals trade from the Great Lakes region. Enough would welcome Samsung's statement on certification, to encourage further government action on the issue.
b) Does the company have a stated policy of support for certification?	Yes = 2 pts, No = 0 pts	0	"Samsung Electronics conflict minerals policy is available on its website and includes support for the has made a public statement in support of EICC-GeSI Conflict Free Smelter certification process. Samsung requested its suppliers to use conflict free smelters in compliance with its conflict-free minerals policy. "	See 3a
c) Has the company provided financial support for certification? Participation in the Public Private Alliance (PPA) would count for points; PPA is a step toward certification but not certification, as per the definition: certification as a multi-stakeholder process similar to the Kimberley and/or Forest Stewardship Council processes, which would be an international regime to trace, audit, and certify 3TG metals as being conflict-free.	Yes = 2 pts for support > \$500K, 1.5 pts for support >\$200K, 1 pt for support <\$200K, No = 0 pts	1	"Samsung is a member of the EICC and an apportionment of its dues are allocated toward the PPA."	One point was given for the company's contribution to the EICC contribution to the PPA. However, adding the company's name and contribution to the PPA would add significantly to the initiative, and we would welcome the company's individual participation in the PPA and other processes related to certification.
d) Has the company participated in the process for developing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and did it commit to piloting the guidance?	Yes = 2 pts, No = 0 pts	0	"Samsung is a member of the EICC Extractives WG which has participated in the OECD process."	No points were awarded, as the company did not participate in the OECD meetings to develop the Guidance and has not yet agreed to pilot the Guidance. Enough would welcome the company's piloting of the Guidance and publication of its due diligence. EICC contributed to the Guidance but this question is about the company-specific engagement in the process.

Scorecard Criteria	Scoring Allocation	Score	Comments	Justification
Section 4: Stakeholder Engagement (2 pts max score)				
a) Did the company meet with the NGO coalition regarding inquiries on conflict minerals?	Yes = 1 pt, No = 0 pt	1	"Samsung Electronics has participated in conflict-free minerals seminar held in Washington DC (June 2011) and Brussels (September 2011) to discuss with NGO and key organizations. Currently, this result of discussion is included in our procurement process."	Yes.
b) Has the company held regular communication with NGO coalition regarding conflict minerals (at least bi-monthly)?	Yes = 1 pt, No = 0 pt	0	"No."	No. Samsung is not a regular participant in the monthly multi-stakeholder calls on conflict minerals, is not part of the PPA, was not part of the Multi-stakeholder group on the SEC, and did not participate in the OECD process. Enough would welcome the company's participation in at least some of these important fora for dialogue with civil society.
Section 5: Support for Legislation (6 pts max score)				
a) Did the company participate in the Multi-stakeholder group of NGOs, companies, and investors to the SEC and sign on to the Group's letters?	Yes = 2 pts, No = 0 pts	0	"To build and maintain a conflict-free minerals traceability scheme, collective contribution from government, NGO's and industry is needed. Samsung presented the issue to the Korean government and asked them to encourage participation from the whole industry. The ministry of knowledge economy of Korea held a seminar about conflict minerals with Samsung Electronics to other electronic companies and NGOs. Currently, Samsung and the government have collaborated to implement the origin tracking system and publicize the issue collectively."	The United States is a substantial market for the company, and it therefore has interest in public policy in the U.S. The company's participation in the Multi-stakeholder Group would therefore be welcome, or in individual submissions to the SEC.
b) Did the company issue a statement advocating for legislation in Europe on conflict minerals?	Yes = 2 pts, No = 0 pts	0	"No."	Europe is a substantial market for the company, and it therefore has interest in public policy in Europe. The company's public statements for legislation in Europe would therefore make a difference on this important issue and would be welcome.
c) Did the company issue a public statement against the threatened lawsuit against the SEC regulations on conflict minerals by the Chamber of Commerce?	Yes = 2 pts, No = 0 pts	0	"No."	Not to our knowledge. According to OpenSecrets.org, Samsung spent \$150,000 on lobbying in 2011. In furtherance of steps on conflict minerals, Enough would welcome a statement against the threatened lawsuit, following statements by Microsoft and GE. IT industry statements on SOPA helped reverse the Chamber's position in 2011.
Scoring		48 pts max	13	

Scorecard Criteria	Scoring Allocation	Score	Comments	Justification
Rating %		27%		

Scorecard Criteria	Scoring Allocation	Score	Company comments	Justification
Section 1: Trace (10 pts max score)				
a) Has the company investigated and come to know precisely which companies refine/smelt the company's supply of 3TG, with third-party verification?	0.5 pts for each metal investigated, 0.5 pts for each metal verified, max 4 pts.	2	"SanDisk has assessed its supply chain using the EICC-GeSI Due Diligence Reporting Tool. Total of 63 suppliers were surveyed and we have achieved 92.4% spent coverage. All responses have disclosed smelter/refiner information at the minimum. Currently we are actively compiling this information and inputting it into the industry's smelter name consolidation process."	Two points for the investigation. Enough looks forward to the company's third-party verification of the smelters.
b) Has the company published the refiners it uses for 3TG?	1 pt for each metal published, max 4 pts.	3	"At the time of our submission we did not have enough information to respond to that, so we appropriately received a score of 0. Since then, however, our manufacturing suppliers have provided us with smelter identification that covers 95% of our 2011 spend. All of the smelters identified are outside of the Conflict Regions and all but 2 suppliers report Conflict Minerals policies consistent with ours. The two suppliers that are not in compliance have indicated a willingness to cooperate, and we are therefore providing them guidance, support, and a bit more time. I would also note that we have encountered a small number of suppliers (all brought in through a corporate acquisition) that were unwilling to cooperate or comply with all SanDisk quality and/or Corporate social Responsibilities, including Conflict Minerals. All of those have been accordingly phased out and replaced . I'm not clear which venue we are expected to use for publishing the list of smelters being used, but we are certainly prepared to do so."	Yes, SanDisk is publishing the names of its smelters - the first company to do so. These smelters represent 97% of its dollar spend and 80% of its suppliers, therefore only 3 out of 4 points were given. Once all suppliers are included, full points will be awarded.

Scorecard Criteria	Scoring Allocation	Score	Company comments	Justification
c) Has the company visited at least two of its refiners and inquired about the use of conflict minerals within the past year?	Yes = 2 pts, No = 0 pts	2	<p>"Since we had not initiated an audit program at that time, we scored 0 on this question, but our SQE organization is currently conducting an audit of two smelters identified by one of our major suppliers. [It should be noted here that we do not have direct customer-supplier relationship with any smelters, but that it is rather a story of suppliers to suppliers of our suppliers, which means that we've had to negotiate multiple levels of permission before undertaking site visits.]</p> <p>We will review the results of these first audits and use lessons learned to extend the program to meet our objective of 100% supplier audits every two years."</p>	Yes, two visits.
Section 2: Audit (22 pts max score)				
a) Does the company have a stated policy of auditing suppliers of 3TG metals?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	4	<p>"SanDisk has fully integrated the conflict mineral issues into our procurement and supply chain management processes. On SanDisk's Conflict Free Minerals Policy (13-00-WW-01-00007), established since August 2011, we explain that conflict mineral is part of the existing corporate social responsibility supplier audit."</p> <p>"We received 2 out of 4 points. Since then, we have revised our Supplier Vetting Process (aka the Supplier Survey) to require our manufacturing suppliers to have implemented a Conflict Minerals policy consistent with ours (and the EICC) and providing for audit verification. All new (manufacturing) suppliers are required to demonstrate compliance before being qualified. Existing suppliers are being re-qualified, and the results thus far are as reported above in Section 1, question b."</p>	Yes. The company will use the EICC Code to audit its suppliers, which will include conflict minerals in 2012. However, the company does not yet audit its 1st tier or other suppliers with regard to whether they are using CFS compliant smelters. Enough would welcome such an audit program. A requirement for suppliers to use only CFS compliant smelters would be possible now, and enforcement of this policy could begin with tantalum, where a majority of tantalum smelters have been certified.

Scorecard Criteria	Scoring Allocation	Score	Company comments	Justification
<p>b) Has the company conducted internal audits of the procurement practices of 3TG suppliers down to the level of refiner, at least, within the last year?</p>	<p>Yes = 1 pt for each metal (4 pts max), No = 0 pts</p>	<p>3</p>	<p>"SanDisk has assessed its supply chain using the EICC-GeSI Due Diligence Reporting Tool. Total of 63 suppliers were surveyed and we have achieved 92.4% spent coverage. All responses have disclosed smelter/refiner information at the minimum. Currently we are actively compiling this information and feeding it into the industry's smelter name consolidation process."</p> <p>"We scored 0 on this, but it is similar to the Section 1, question c. We have audited many of our direct suppliers, but until recently had not extended that process downstream. We now have, and audits of the first two smelters are underway."</p> <p>When we revised our supplier vetting/onboarding process to incorporate Conflict Minerals (and a number of risk management criteria) we decided to refresh the qualification status of all our manufacturing suppliers to the new standard. As you can probably imagine, that process can be drawn out and requires considerable expediting and follow-up. In order to achieve the most significant results as quickly as possible, we assigned a higher priority to those suppliers who receive most of our dollars. Accordingly, we have now received and validated the completed EICC-GeSI surveys back from 80% of our relevant suppliers, accounting for over 95% of our spend. [By the way, we define a relevant supplier as one who provides us with production materials that include any of the metals in question, as reported on</p>	<p>37 suppliers have been audited on their use of conflict minerals, since the new policy was put in place. Three points were awarded, because this represented 78% of the company's smelters. Going forward, Enough would welcome SanDisk to audit its suppliers on the basis of whether they are using only CFS compliant smelters.</p>

Scorecard Criteria	Scoring Allocation	Score	Company comments	Justification
c) Has the company had third-party audits conducted of 3TG suppliers down to the level of refiner, at least, within the past year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"We also scored 0 on this, and that was appropriate since we had not initiated any such audits. Since then, however, we have engaged a 3rd party auditing firm and authorized them to initiate audits, focused initially on our Contract Manufacturing partners. These are not exclusively Conflict Minerals audits, but rather validation of the information secured when these firms were last qualified or audited, including quality systems and processes, business and financial standards and practices and Corporate Social Responsibilities (including obviously Conflict Minerals). In addition, we have partnered with Source-44, a San Diego-based firm that is performing Conflict Minerals verifications for many customers. Our engagement with them is not, however, to delegate the audit function. We are working with them to further develop their software tools into a more comprehensive supply chain tracking system. We are providing them with "expert" guidance on their design, and have agreed to pilot the prototype tool when it becomes available."	Enough would welcome 3rd party audits along these lines.
d) Has the company participated in the Extractives Work Group for the EICC-GeSI conflict-free smelter program (CFS)?	Yes = 2 pts, No = 0 pts	2	"SanDisk actively participates in the EICC-GeSI Extractives Work Group and was present in the last two Workshops in Virginia (June 2011) and Pennsylvania (April 2012). We fully support the conflict free smelter program, driven by EICC."	Yes.
e) Has the company provided financial support for auditing for 3TG?	Yes = 4 pts for support >\$100K, 2 pts for support >\$50K, 1 pt for support <\$50K.	1	"SanDisk pays the annual fee of \$5000 to be member of the EICC-GeSI Extractive Work Group, which provides financial support for auditing for 3TG."	One point was given for EICC Working Group contribution of \$5,000, which funds the overall CFS program. Additional points would be given here for participation in the CFS Early Adopters Program, to incentivize smelters to participate in the audits http://solutions-network.org/site-cfs/ We would welcome the company's participation in the project.
f) Has the company developed at least one verifiably conflict-free product, with independently audited supply chains all the way to the point of extraction?	Yes = 4 pts, No = 0 pts.	0	No comments provided.	Not to our knowledge. Enough would welcome this step, along the line of Intel's commitment to making a fully conflict-free chip in 2013.
Section 3: Certify (8 pts max score)				

Scorecard Criteria	Scoring Allocation	Score	Company comments	Justification
a) Has the company made public statements in support of certification?	Yes = 2 pts, No = 0 pts	2	"SanDisk's public statement in support of conflict mineral certification can be viewed here (last bullet): http://www.sandisk.com/about-sandisk/corporate-social-responsibility/corporate-responsibility/labor-and-ethics . "SanDisk supports... efforts to establish an international regime that would enable companies to include in their products materials that are certified to come from "conflict-free" sources.	Yes. Good statement from SanDisk.
b) Does the company have a stated policy of support for certification?	Yes = 2 pts, No = 0 pts	2	"On SanDisk's Conflict Free Minerals Policy (13-00-WW-01-00007), established since August 2011, we details our support of certification and our expectations of our suppliers to participate in industry efforts and to only source from certified by EICC-GeSI Conflict Free Smelter Program."	See 3a.
c) Has the company provided financial support for certification? Participation in the Public Private Alliance (PPA) would count for points; PPA is a step toward certification but not certification, as per the definition: certification as a multi-stakeholder process similar to the Kimberley and/or Forest Stewardship Council processes, which would be an international regime to trace, audit, and certify 3TG metals as being conflict-free.	Yes = 2 pts for support > \$500K, 1.5 pts for support >\$200K, 1 pt for support <\$200K, No = 0 pts	1	"SanDisk pays the annual fee of \$5000 to be member of the EICC-GeSI Extractive Work Group, which provides financial support for certification."	One point was given for the company's contribution to the EICC contribution to the PPA. However, adding the company's name and contribution to the PPA would add significantly to the initiative, and we would welcome the company's individual participation in the PPA and other processes related to certification.
d) Has the company participated in the process for developing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and did it commit to piloting the guidance?	Yes = 2 pts, No = 0 pts	0	"As part of the EICC-GeSI Extractive Work Group member, SanDisk has helped shape the OECD Due Diligence Guidance and is participating in it as part of the association."	No points were awarded, as the company did not participate in the OECD meetings to develop the Guidance and has not yet agreed to pilot the Guidance. Enough would welcome the company's piloting of the Guidance and publication of its due diligence. EICC contributed to the Guidance but this question is about the company-specific engagement in the process.
Section 4: Stakeholder Engagement (2 pts max score)				
a) Did the company meet with the NGO coalition regarding inquiries on conflict minerals?	Yes = 1 pt, No = 0 pt	1	"SanDisk has met with Enough representatives - Aaron Hall and Sasha Lezhnev - in the last two EICC-GeSI Extractives Workshops in Virginia (June 2011) and Pennsylvania (April 2012)."	Yes.

Scorecard Criteria	Scoring Allocation	Score	Company comments	Justification
b) Has the company held regular communication with NGO coalition regarding conflict minerals (at least bi-monthly)?	Yes = 1 pt, No = 0 pt	0	"We do participate in the EICC-GeSi conference calls, and would welcome the opportunity to have ongoing dialogues with Enough and other stakeholders."	No. Sandisk is not a regular participant in the monthly multi-stakeholder calls on conflict minerals, is not part of the PPA, was not part of the Multi-stakeholder group on the SEC, and did not participate in the OECD process. Enough would welcome the company's participation in at least some of these important fora for dialogue with civil society.
Section 5: Support for Legislation (6 pts max score)				
a) Did the company participate in the Multi-stakeholder group of NGOs, companies, and investors to the SEC and sign on to the Group's letters?	Yes = 2 pts, No = 0 pts	0	No comments provided.	The United States is a substantial market for the company, and it therefore has interest in public policy in the U.S. The company's participation in the Multi-stakeholder Group would therefore be welcome, or in individual submissions to the SEC.
b) Did the company issue a statement advocating for legislation in Europe on conflict minerals?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Europe is a substantial market for the company, and it therefore has interest in public policy in Europe. The company's public statements for legislation in Europe would therefore make a difference on this important issue and would be welcome.
c) Did the company issue a public statement against the threatened lawsuit against the SEC regulations on conflict minerals by the Chamber of Commerce?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Not to our knowledge. In furtherance of steps on conflict minerals, Enough would welcome a statement against the threatened lawsuit, following statements by Microsoft and GE. IT industry statements on SOPA helped reverse the Chamber's position in 2011.
Scoring		48 pts max	23	
Rating %			48%	

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
Section 1: Trace (10 pts max score)				
a) Has the company investigated and come to know precisely which companies refine/smelt the company's supply of 3TG, with third-party verification?	0.5 pts for each metal investigated, 0.5 pts for each metal verified, max 4 pts.	2	"Sharp has investigated approximately 2,000 suppliers of ours in Japan and abroad to answer our original questionnaire on whether conflict minerals are contained in their parts and materials supplied to Sharp, and if so, also on the countries of origin, etc., albeit without third-party verification. We have received replies from approximately 90% of those suppliers. About 30% of the suppliers that replied answered that conflict minerals were contained. Among this 30%, around 80% said that those minerals were not from the DRC or adjoining countries, however, many of them did not answer concretely the countries of origin and smelters as a business secret, under the situation that the final rules of Section 1502 had not yet been released. These information above have been disclosed in Sharp Sustainability Report 2012 Japanese version Page 079 (Please see: http://www.sharp.co.jp/corporate/eco/csr_report/pdf/esr2012j.pdf) and its English version will be published by the end of August 2012. We have been collecting and analyzing internal and external information on the conflict minerals issues, including the Dodd-Frank Act, Section 1502, in cooperation with our US sales subsidiary, Sharp Electronics Corporation in Mahwah, NJ."	Two points for the investigation. Enough looks forward to the company's third-party verification of the smelters.
b) Has the company published the refiners it uses for 3TG?	1 pt for each metal published, max 4 pts.	0	"No."	Not to our knowledge. Enough would welcome publication of the number and/or name of the smelters in the company's supply chain, as some companies have already done. This would aid transparency in the supply chain at the critical chokepoint in the chain for conflict minerals.
c) Has the company visited at least two of its refiners and inquired about the use of conflict minerals within the past year?	Yes = 2 pts, No = 0 pts	0	"No."	Enough would welcome the company's visit to smelters, as this would send important messages about the need for all smelters to go through independent audits, for example through the CFS process.
Section 2: Audit (22 pts max score)				

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
a) Does the company have a stated policy of auditing suppliers of 3TG metals?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"No, but Sharp will make and publish its principle after the SEC publishes final rules associated with the disclosure of the source of conflict minerals provided by 2010 US legislation, Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502. " "2)In January, 2011, we requested approximately 2,000 suppliers of ours in Japan and abroad to answer our original questionnaire on whether conflict minerals are contained in their parts and materials supplied to Sharp, and if so, also on the countries of origin, etc. - We have received replies from approximately 90% of those suppliers. About 30% of the suppliers that replied answered that conflict minerals were contained. Among this 30%, around 80% said that those minerals were not from the DRC or adjoining countries, however, many of them did not answer concretely the countries of origin and smelters as a business secret, under the situation that the final rules of Section 1502 had not yet been released."	No points were given, because the company does not yet audit its 1st tier or other suppliers on conflict minerals, particularly with regard to whether they are using CFS compliant smelters. The company also does not have a policy to require all of its suppliers to only source from CFS compliant smelters, once a sufficient number are available. Such a policy would send strong signals to smelters to participate in the CFS program. Enough would welcome such an audit program and requirement, to help ensure that its suppliers are using conflict-free smelters and minerals.
b) Has the company conducted internal audits of the procurement practices of 3TG suppliers down to the level of refiner, at least, within the last year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"No."	
c) Has the company had third-party audits conducted of 3TG suppliers down to the level of refiner, at least, within the past year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"No."	
d) Has the company participated in the Extractives Work Group for the EICC-GeSI conflict-free smelter program (CFS)?	Yes = 2 pts, No = 0 pts	2	"No, but Sharp will indirectly participate in it since Sharp is a member of a study group for responsible minerals procurement organized by JEITA, Japan Electronics and Information Technology Industries Association, and JEITA concluded a memorandum of understanding with EICC and GeSI on the utilization of their program, related resources etc. in Jan.2012."	Sharp supports the Extractives Work Group via its JEITA membership.
e) Has the company provided financial support for auditing for 3TG?	Yes = 4 pts for support >\$100K, 2 pts for support >\$50K, 1 pt for support <\$50K.	0	"No."	Not to our knowledge.
f) Has the company developed at least one verifiably conflict-free product, with independently audited supply chains all the way to the point of extraction?	Yes = 4 pts, No = 0 pts.	0	"No."	Not to our knowledge. Enough would welcome this step, along the line of Intel's commitment to making a fully conflict-free chip in 2013.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
Section 3: Certify (8 pts max score)				
a) Has the company made public statements in support of certification?	Yes = 2 pts, No = 0 pts	0	"No, but Sharp will make and publish its principles after the SEC publishes final rules associated with the disclosure of the source of conflict minerals provided by 2010 US legislation, Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502."	"3)We made a disclosure, in our Environmental and Social Report 2011 and on our website, about our basic policy of not using in our products and devices minerals that are mined illegally under the influence of anti-government militia forces, and also the beginning of our efforts, including the above-mentioned questionnaire to our suppliers. http://sharp-world.com/corporate/eco/csr_report/pdf/esr2011e.pdf (Page 89) http://sharp-world.com/corporate/eco/social/transaction/supplychain.html "
b) Does the company have a stated policy of support for certification?	Yes = 2 pts, No = 0 pts	0	"No."	Not to our knowledge.
c) Has the company provided financial support for certification? Participation in the Public Private Alliance (PPA) would count for points; PPA is a step toward certification but not certification, as per the definition: certification as a multi-stakeholder process similar to the Kimberley and/or Forest Stewardship Council processes, which would be an international regime to trace, audit, and certify 3TG metals as being conflict-free.	Yes = 2 pts for support > \$500K, 1.5 pts for support >\$200K, 1 pt for support <\$200K, No = 0 pts	0	"No."	Not to our knowledge.
d) Has the company participated in the process for developing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and did it commit to piloting the guidance?	Yes = 2 pts, No = 0 pts	0	"No."	No points were awarded, as the company did not participate in the OECD meetings to develop the Guidance and has not yet agreed to pilot the Guidance. Enough would welcome the company's piloting of the Guidance and publication of its due diligence. EICC contributed to the Guidance but this question is about the company-specific engagement in the process.
Section 4: Stakeholder Engagement (2 pts max score)				
a) Did the company meet with the NGO coalition regarding inquiries on conflict minerals?	Yes = 1 pt, No = 0 pt	0	"No, but Sharp has answered the questionnaires on efforts toward the conflict minerals issue from an NGO, A SEED Japan (July 2010 and October 2011)."	Not to our knowledge.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
b) Has the company held regular communication with NGO coalition regarding conflict minerals (at least bi-monthly)?	Yes = 1 pt, No = 0 pt	0	"No."	No. Sharp is not a regular participant in the monthly multi-stakeholder calls on conflict minerals, is not part of the PPA, was not part of the Multi-stakeholder group on the SEC, and did not participate in the OECD process. Enough would welcome the company's participation in at least some of these important fora for dialogue with civil society.
Section 5: Support for Legislation (6 pts max score)				
a) Did the company participate in the Multi-stakeholder group of NGOs, companies, and investors to the SEC and sign on to the Group's letters?	Yes = 2 pts, No = 0 pts	0		The United States is a substantial market for the company, and it therefore has interest in public policy in the U.S. The company's participation in the Multi-stakeholder Group would therefore be welcome, or in individual submissions to the SEC.
b) Did the company issue a statement advocating for legislation in Europe on conflict minerals?	Yes = 2 pts, No = 0 pts	0	"No."	Europe is a substantial market for the company, and it therefore has interest in public policy in Europe. The company's public statements for legislation in Europe would therefore make a difference on this important issue and would be welcome.
c) Did the company issue a public statement against the threatened lawsuit against the SEC regulations on conflict minerals by the Chamber of Commerce?	Yes = 2 pts, No = 0 pts	0	"No."	Not to our knowledge. According to OpenSecrets.org, Sharp spent \$70,000 on lobbying in 2011. In furtherance of steps on conflict minerals, Enough would welcome a statement against the threatened lawsuit, following statements by Microsoft and GE. IT industry statements on SOPA helped reverse the Chamber's position in 2011.
Scoring		48 pts max	4	
Rating %			8%	

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
Section 1: Trace (10 pts max score)				
a) Has the company investigated and come to know precisely which companies refine/smelt the company's supply of 3TG, with third-party verification?	0.5 pts for each metal investigated, 0.5 pts for each metal verified, max 4 pts.	2	"Yes, Sony has launched supplier survey to our suppliers based in EICC/GeSI CONflict Minerals Reporting Template for all 4 minerals."	Two points were given because the EICC template tool that was used included questions on which smelters the company was using.
b) Has the company published the refiners it uses for 3TG?	1 pt for each metal published, max 4 pts.	0	"No."	Not to our knowledge. Enough would welcome publication of the number and/or name of the smelters in the company's supply chain, as some companies have already done. This would aid transparency in the supply chain at the critical chokepoint in the chain for conflict minerals.
c) Has the company visited at least two of its refiners and inquired about the use of conflict minerals within the past year?	Yes = 2 pts, No = 0 pts	0	"No."	Enough would welcome the company's visit to smelters, as this would send important messages about the need for all smelters to go through independent audits, for example through the CFS process.
Section 2: Audit (22 pts max score)				
a) Does the company have a stated policy of auditing suppliers of 3TG metals?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	4	"No."	Yes. The company will use the EICC Code to audit its suppliers, which will include conflict minerals in 2012. However, the company does not yet audit its 1st tier or other suppliers with regard to whether they are using CFS compliant smelters. Enough would welcome such an audit program. A requirement for suppliers to use only CFS compliant smelters would be possible now, and enforcement of this policy could begin with tantalum, where a majority of tantalum smelters have been certified.
b) Has the company conducted internal audits of the procurement practices of 3TG suppliers down to the level of refiner, at least, within the last year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"Yes, Sony has launched supplier survey to our suppliers based in EICC/GeSI CONflict Minerals Reporting Template for all 4 minerals." When questioned if Sony uses the EICC Code to audit its suppliers, Sony said, "Yes."	The audits of first tier suppliers incorporating conflict minerals have not yet begun. The reporting template is not an audit.
c) Has the company had third-party audits conducted of 3TG suppliers down to the level of refiner, at least, within the past year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	"No."	The audits of first tier suppliers incorporating conflict minerals have not yet begun.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
d) Has the company participated in the Extractives Work Group for the EICC-GeSI conflict-free smelter program (CFS)?	Yes = 2 pts, No = 0 pts	2	"Yes, Sony is a member of EICC and actively participating and contributing to Extractive WG and its sub-groups activity."	Yes. Sony is one of only a handful of Japanese electronics companies to have joined the EICC, a positive step.
e) Has the company provided financial support for auditing for 3TG?	Yes = 4 pts for support >\$100K, 2 pts for support >\$50K, 1 pt for support <\$50K.	1	"Yes, Sony is financially supporting EICC/GeSI's CONflict Free Smelter Program through EICC/GeSI membership dues. Sony is also financially supporting iTSCI and PPA."	One point was given for EICC Working Group contribution, which funds the overall CFS program. Additional points would be given here for participation in the CFS Early Adopters Program, to incentivize smelters to participate in the audits http://solutions-network.org/site-cfs/ We would welcome the company's participation in the project. ITRI is an industry bag-and-tag system that is not auditing. PPA contributions are covered under Question 3.
f) Has the company developed at least one verifiably conflict-free product, with independently audited supply chains all the way to the point of extraction?	Yes = 4 pts, No = 0 pts.	0	"No. We have been working with related divisions and our suppliers to trace our products' supply chains."	Not to our knowledge. Enough would welcome this step, along the line of Intel's commitment to making a fully conflict-free chip in 2013.
Section 3: Certify (8 pts max score)				
a) Has the company made public statements in support of certification?	Yes = 2 pts, No = 0 pts	1	"We have decided to participate in the Public-Private Alliance for Responsible Minerals Trade and had made public statements in support of the PPA. URL: http://www.sony.net/SonyInfo/csr/news/20111116.html ." Sony "supports... coordination amongst government, industry, and civil society actors seeking to support conflict-free sourcing from the DRC."	This is closely linked to certification but is not exactly the same as the definition of certification as defined in 3a, therefore partial credit was awarded.
b) Does the company have a stated policy of support for certification?	Yes = 2 pts, No = 0 pts	1		See 3a
c) Has the company provided financial support for certification? Participation in the Public Private Alliance (PPA) would count for points; PPA is a step toward certification but not certification, as per the definition: certification as a multi-stakeholder process similar to the Kimberley and/or Forest Stewardship Council processes, which would be an international regime to trace, audit, and certify 3TG metals as being conflict-free.	Yes = 2 pts for support > \$500K, 1.5 pts for support >\$200K, 1 pt for support <\$200K, No = 0 pts	1	"Yes. We are supporting through EICC/GeSI membership dues and individually supporting PPA and iTSCI as Sony."	Good step by Sony to join the PPA.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
d) Has the company participated in the process for developing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and did it commit to piloting the guidance?	Yes = 2 pts, No = 0 pts	0	"Yes, we have contributed to the process for developing OECD guidance through EICC."	Points here are for individual company participation in the OECD, not for industry participation.
Section 4: Stakeholder Engagement (2 pts max score)				
a) Did the company meet with the NGO coalition regarding inquiries on conflict minerals?	Yes = 1 pt, No = 0 pt	1	"Yes. Has met with ENOUGH and several times at Extractive/Conflict Mineral workshop hosted EICC/GeSI. Has met on Feb. 27th and 28th in Japan."	Yes.
b) Has the company held regular communication with NGO coalition regarding conflict minerals (at least bi-monthly)?	Yes = 1 pt, No = 0 pt	0	"No."	No. Sony is not a regular participant in the monthly multi-stakeholder calls on conflict minerals, is not part of the PPA, was not part of the Multi-stakeholder group on the SEC, and did not participate in the OECD process. Enough would welcome the company's participation in at least some of these important fora for dialogue with civil society.
Section 5: Support for Legislation (6 pts max score)				
a) Did the company participate in the Multi-stakeholder group of NGOs, companies, and investors to the SEC and sign on to the Group's letters?	Yes = 2 pts, No = 0 pts	0	"No."	The United States is a substantial market for the company, and it therefore has interest in public policy in the U.S. The company's participation in the Multi-stakeholder Group would therefore be welcome, or in individual submissions to the SEC.
b) Did the company issue a statement advocating for legislation in Europe on conflict minerals?	Yes = 2 pts, No = 0 pts	0	"No."	Europe is a substantial market for the company, and it therefore has interest in public policy in Europe. The company's public statements for legislation in Europe would therefore make a difference on this important issue and would be welcome.
c) Did the company issue a public statement against the threatened lawsuit against the SEC regulations on conflict minerals by the Chamber of Commerce?	Yes = 2 pts, No = 0 pts	0	"No."	Not to our knowledge. According to OpenSecrets.org, Sony spent \$3,610,000 on lobbying in 2011. In furtherance of steps on conflict minerals, Enough would welcome a statement against the threatened lawsuit, following statements by Microsoft and GE. IT industry statements on SOPA helped reverse the Chamber's position in 2011.

Scoring

48 pts max

13

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
		27%		

*Sony is a member of GeSI and EICC

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
Section 1: Trace (10 pts max score)				
a) Has the company investigated and come to know precisely which companies refine/smelt the company's supply of 3TG, with third-party verification?	0.5 pts for each metal investigated, 0.5 pts for each metal verified, max 4 pts.	2	"It can be added here that the top management at Toshiba has acknowledged the conflict mineral issue as an important issue in our supply chain management. As such, since last year (2011), Toshiba has established company-wide organizational structures to deal with the issue. Since November 2011, Toshiba has been using the EICC-GeSI reporting template to investigate our suppliers on the use of the 3TGs in our products. The results have been compiled and we have been able to identify a number of smelters. The company started in the semiconductor division and PC division, and there are 8 more divisions to go."	Two points for investigation but no points for lack of verification. Enough would welcome the company's verification of these smelters.
b) Has the company published the refiners it uses for 3TG?	1 pt for each metal published, max 4 pts.	0	"157 smelters we found are the result from our survey to some of our suppliers and not extended to whole. If you will mention this precondition, then we agree to publish this information."	Toshiba found 157 smelters in its supply chain, but this is the result only of an investigation of two out of its ten divisions. When a more complete supplier investigation is complete, points will be awarded here.
c) Has the company visited at least two of its refiners and inquired about the use of conflict minerals within the past year?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Enough would welcome the company's visit to smelters, as this would send important messages about the need for all smelters to go through independent audits, for example through the CFS process.
Section 2: Audit (22 pts max score)				

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
a) Does the company have a stated policy of auditing suppliers of 3TG metals?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	1	<p>"Toshiba has a policy which prohibits the use of conflict minerals in our products or components that we procure. Please refer to our conflict mineral policy as under http://www.toshiba.co.jp/csr/en/human_rights/index.html in line with the policy, since 2011, we have been conducting surveys of our suppliers using the EICC-GeSI reporting template to identify the smelters of the 3TGs. Once a validated supply chain is established through initiatives such as full-fledged smelter verification under EICC-GeSI's Conflict-Free Smelter Program or development of a mineral tracing program, we will require our suppliers to procure the minerals through that validated supply chain."</p> <p>"We have addressed around 15,000 of our suppliers to seek understanding of Toshiba's Conflict Minerals Policy through online survey. The purpose of this is to educate our suppliers who may not be fully aware of this issue."</p>	One point was awarded, because the company policy is that once CFS program smelter lists are sufficiently available, Toshiba suppliers must only accept metals from smelters that have been audited and are deemed compliant by the EICC/GeSI Conflict-free Smelter (CFS) Program. The company should clarify the definition of "once established" and should begin enforcing this policy on tantalum, where it appears that there are a sufficient number of compliant smelters available. However, other points were not given because the company does not yet audit its 1st tier or other suppliers on conflict minerals, particularly with regard to whether they are using CFS compliant smelters. Enough would welcome such an audit program.
b) Has the company conducted internal audits of the procurement practices of 3TG suppliers down to the level of refiner, at least, within the last year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	No comments provided.	Not to our knowledge.
c) Has the company had third-party audits conducted of 3TG suppliers down to the level of refiner, at least, within the past year?	Yes = 1 pt for each metal (4 pts max), No = 0 pts	0	No comments provided.	Not to our knowledge.
d) Has the company participated in the Extractives Work Group for the EICC-GeSI conflict-free smelter program (CFS)?	Yes = 2 pts, No = 0 pts	2	No comments provided.	Yes. Toshiba became an EICC member in June 2011. Toshiba is one of only a handful of Japanese electronics companies to have joined the EICC, a positive step.
e) Has the company provided financial support for auditing for 3TG?	Yes = 4 pts for support >\$100K, 2 pts for support >\$50K, 1 pt for support <\$50K.	1	As an EICC member since June 2011, we have been providing financial support for auditing for 3TG."	One point was given for EICC Working Group contribution, which funds the overall CFS program. Additional points would be given here for participation in the CFS Early Adopters Program, to incentivize smelters to participate in the audits http://solutions-network.org/site-cfs/ We would welcome the company's participation in the project. ITRI is an industry bag-and-tag system that is not auditing. PPA contributions are covered under Question 3.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
f) Has the company developed at least one verifiably conflict-free product, with independently audited supply chains all the way to the point of extraction?	Yes = 4 pts, No = 0 pts.	0	No comments provided.	Not to our knowledge. Enough would welcome this step, along the line of Intel's commitment to making a fully conflict-free chip in 2013.
Section 3: Certify (8 pts max score)				
a) Has the company made public statements in support of certification?	Yes = 2 pts, No = 0 pts	1	Toshiba "supports... the development of a responsible minerals trade from the Great Lakes Region of Central Africa."	This is closely linked to certification but is not exactly the same as the definition of certification as defined in 3a, therefore partial credit was awarded.
b) Does the company have a stated policy of support for certification?	Yes = 2 pts, No = 0 pts	1	No comments provided.	See 3a
c) Has the company provided financial support for certification? Participation in the Public Private Alliance (PPA) would count for points; PPA is a step toward certification but not certification, as per the definition: certification as a multi-stakeholder process similar to the Kimberley and/or Forest Stewardship Council processes, which would be an international regime to trace, audit, and certify 3TG metals as being conflict-free.	Yes = 2 pts for support > \$500K, 1.5 pts for support >\$200K, 1 pt for support <\$200K, No = 0 pts	1	"Though Toshiba has not made any public statement in support of certification, we have joined the Public-Private Alliance (PPA) and have provided financial support to it."	PPA member as an individual company. Excellent step from Toshiba.
d) Has the company participated in the process for developing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and did it commit to piloting the guidance?	Yes = 2 pts, No = 0 pts	0	"Jeita working group starting -- will share information."	No points were awarded, as the company did not participate in the OECD meetings to develop the Guidance and has not yet agreed to pilot the Guidance. Enough would welcome the company's piloting of the Guidance and publication of its due diligence. EICC contributed to the Guidance but this question is about the company-specific engagement in the process.
Section 4: Stakeholder Engagement (2 pts max score)				

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
a) Did the company meet with the NGO coalition regarding inquiries on conflict minerals?	Yes = 1 pt, No = 0 pt	1	"In addition to participating regularly in conflict mineral seminars and holding meetings with relevant organizations to deepen our understanding on the conflict mineral issue, we have had communication with the NGO coalition on conflict minerals such as A Seed Japan and are also planning to meet with one of the representatives from Enough Project. JEITA (Japan Electronics and Information Technology Industry Association) has signed an MoU with EICC to work together on the conflict mineral issue. Toshiba is planning to become a key member of this project."	Yes.
b) Has the company held regular communication with Enough NGO coalition regarding conflict minerals (at least bi-monthly)?	Yes = 1 pt, No = 0 pt	0	Toshiba is a member of the PPA.	PPA membership counts in 3c. Toshiba is not a regular participant in the monthly multi-stakeholder calls on conflict minerals, is not part of the PPA, was not part of the Multi-stakeholder group on the SEC, and did not participate in the OECD process. Enough would welcome the company's participation in at least some of these important fora for dialogue with civil society.
Section 5: Support for Legislation (6 pts max score)				
a) Did the company participate in the Multi-stakeholder group of NGOs, companies, and investors to the SEC and sign on to the Group's letters?	Yes = 2 pts, No = 0 pts	0	"Though we have not issued a public statement against the threatened lawsuit against the SEC regulations, Toshiba being a member of JEITA and EICC is in itself a testimonial that we are not against the SEC regulations on conflict minerals."	The United States is a substantial market for the company, and it therefore has interest in public policy in the U.S. The company's participation in the Multi-stakeholder Group would therefore be welcome, or in individual submissions to the SEC.
b) Did the company issue a statement advocating for legislation in Europe on conflict minerals?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Europe is a substantial market for the company, and it therefore has interest in public policy in Europe. The company's public statements for legislation in Europe would therefore make a difference on this important issue and would be welcome.
c) Did the company issue a public statement against the threatened lawsuit against the SEC regulations on conflict minerals by the Chamber of Commerce?	Yes = 2 pts, No = 0 pts	0	No comments provided.	Not to our knowledge. According to OpenSecrets.org, Toshiba spent \$2,000,000 on lobbying in 2011. In furtherance of steps on conflict minerals, Enough would welcome a statement against the threatened lawsuit, following statements by Microsoft and GE. IT industry statements on SOPA helped reverse the Chamber's position in 2011.

Scorecard Criteria	Scoring Allocation	Score	Company Comments	Justification
Scoring	48 pts max	10		
		21%		

*Toshiba is a member of EICC