

TCO Certified. A.7.3 - Conflict Minerals - Questionnaire

This questionnaire includes several questions about brand owner and supplier company efforts to ensure that minerals defined as conflict minerals that are used in certified products are from legitimate sources and do not directly or indirectly finance or benefit armed groups.

Presenting answers and documented proof to the questions in this questionnaire is a way to verify that the brand owner company complies with the criterion for conflict minerals, which TCO Development includes in the section for Socially Responsible Manufacturing in TCO Certified. All questions are to be answered in an open and honest way. All responses will be reviewed by a third party that is approved by TCO Development.

Answers are not limited to the space provided in this form. Additional responses and materials can be provided in a separate document.

Answers shall be assessed and graded by a third party in the following way.

- A green mark is given to “Yes” and proven answers.
- A red mark is given to “No” and unproven answers.

To be accepted as complying with the mandate, the following is required;

- Answering Yes (and providing the required documented proof) to question 1 and additionally to question 2, 3 or 4
- If the answer to 4 is Yes, then answers to 5, 6 and 7 must get a green mark.

Question 1.**Background**

A conflict minerals policy that is both public and communicated through the supply chain is an essential statement by the brand owner. It reflects the brand's commitment to conflict-free sourcing and the expectations of their raw material suppliers regarding the use of conflict minerals

Question

Does the brand owner communicate to suppliers & make public a Conflict Minerals Policy that states its position for the responsible sourcing of minerals?

If yes, state where the information is made public and describe how it is communicated to suppliers

Yes No

Comment: _____

Assessment Guidance

Green: If the answer is 'Yes' the verifier shall be able to confirm the policy is public and also understand how it is communicated to suppliers.

Red: If the answer is 'No' or if the answer is 'Yes' but the policy is not public.

Question 2.**Background**

Development of responsible sourcing initiatives within the Democratic Republic of Congo (DRC) is essential, since they help suppliers meet due diligence requirements, maintain trade and benefit local mining livelihoods dependant on a legitimate mining trade.

Question

Has the brand owner provided financial support to any DRC in-region responsible sourcing programs/initiatives?

If yes, state the initiative/s and provide supporting membership information

Yes No

Comment: _____

Assessment Guidance

Green mark: If the answer is 'Yes' and the verifier has provided proof of participation, such as the list of members in the initiatives the brand owner checked on the A.7.3 template.

Red mark: If the answer is 'No' or if the answer is 'Yes' but no proof is submitted.

Question 3.

Background

CFSI members contribute to a number of tools and resources including the Conflict Minerals Reporting Template; supporting in-region sourcing initiatives and the Conflict Free Smelter Program (identification of smelters and refiners that source conflict-free minerals).

Question

Is the brand owner participating in the EICC Conflict Free Sourcing Initiative?

If yes provide supporting membership information

Yes No

Comment: _____

Assessment Guidance

Green mark: If the answer is ‘Yes’ and the verifier is provided proof of participation, such as the list of members involved in the initiative that is marked on the A.7.3 template.

Red mark: If the answer is ‘No’ or if the answer is ‘Yes’ but no proof is submitted.

Question 4.

Background

The OECD Due Diligence Guidance provides a framework for companies requiring suppliers to disclose their sourcing origins of conflict minerals with respect to human rights and that they do not directly or indirectly contribute to conflict.

Question

Does the brand owner have a due diligence process covering conflict minerals in its supply chain based on the OECD Guidance? *If yes, provide documented proof.*

Yes No

Comment: _____

Assessment Guidance

Green: The verifier has provided proof documentation, such Due Diligence Roadmap, sustainability report or Conflict Mineral Report asserting the OECD five step framework.

With a ‘Yes’ the brand shall also be able to answer ‘Yes’ to questions 5, 6 and 7 to be in full compliance with question 4.

Red: The answer is ‘No’ or if the answer is ‘Yes’ but no proof is submitted.

Answering questions 5, 6 and 7.

Background

It takes time to build up a complete conflict minerals management and monitoring system, but there are key aspects of supply chain management that should be reached in order to verify a credible due diligence process; such as identifying the risk products and suppliers of conflict minerals and being transparent with the findings in order to measure improvement. Questions 5-7 cover this area.

Question 5

Background

A process that helps identify risk areas and chain of custody within the supply chain, which can be covered by a reporting template such as the EICC Conflict Minerals Reporting Template being systematically sent through the supply chain. This is the transfer of information, which facilitates the identification of smelters and refiners.

Question

Has the brand owner a process to identify risk areas in its supply chain? *If yes, provide a description on how this is done.*

Yes No

Comment: _____

Assessment Guidance

Green: If the answer is 'Yes' and the verifier has provided a description on how the brand owner identifies risk areas in their supply chain such as using an established Conflict Mineral Reporting Template.

Red: If the answer is 'No' or if the answer is 'Yes' but no proof is submitted.

Question 6.

Background

An established spot check system is set up in order to strengthen brand owner engagement with suppliers and establish that they are committed to the brand's conflict mineral policy and verify the due diligence process of how that particular risk supplier established that their products do not contain conflict minerals.

Question

Does the Brand owner have a process to respond to identified risks?

Yes No

Comment: _____

Assessment Guidance

Green: If the answer is ‘Yes’

With a ‘Yes’ the Brand owner is declaring it has established a system for conducting due diligence spot checks at identified risk areas within its supply chain of 3T+G.

Red: If the answer is ‘No’

Question 7.

Background

It is important that the brand owner introduces a supply chain transparency system that allows the identification of smelters/refiners in the brand owner’s mineral supply chain.

Question

Does the brand owner publish or make available on request its findings and a list of its smelters? *If yes, state where the information is published.*

Yes No

Comment: _____

Assessment Guidance

Green: If the answer is ‘Yes’ and the verifier is able to view the findings and the list of smelters publicly (web). It is also acceptable that there is a notice on the brand website that for TCO Certified compliance the information can be provided on request.

Red: If the answer is ‘No’

We hereby guarantee that the above information is correct

.....
Signature

.....
Name and title (block letters)

.....
Date (Declaration valid 1 year from date)

.....
The ‘Brand Owner’ company