

Creating a CMD in CDX

Part 3 – Conflict Free Policy

About this Tutorial



The CDX User Manual contains concise information explaining the CDX system, yet assumes familiarity with the industry principles involved. This tutorial and similar supplemental materials provide in-depth, step-by-step instruction on how to accomplish specific business operations using CDX.

About this Tutorial

The tutorial for Creating a CMD in CDX is divided into multiple parts.

Part 3 is presented here.

Part 1	Part 2	Part 3	Part 4	Part 5	Part 6
<ul style="list-style-type: none">• Introduction• CMD Menus• Initiation	<ul style="list-style-type: none">• Metals Identification	<ul style="list-style-type: none">• Conflict Free Policy	<ul style="list-style-type: none">• Adding Smelters<ul style="list-style-type: none">• From List• New Alleged Smelter	<ul style="list-style-type: none">• Importing Non-CDX Submissions• Review, Accept & Reject Supplier CMDs• Adding Smelters from Suppliers	<ul style="list-style-type: none">• CMD Submission

Details Section – Conflict Free Policy

Conflict Free Policy

- This section is designed to assess your company’s conflict-free minerals sourcing due diligence activities. Most items take a “Yes” or “No” answer.
- Depending upon SEC reporting status and customer contracts, some answers may expect a “Yes” response. Answers should be accurate, and verifiable with documentation if requested.
- Additional information may be entered in the comments section.
- **Please reference the RMI Conflict Minerals Reporting Template (CMRT) Completion Guide for complete information on how to respond.**

Conflict Free Policy	
A. Have you established a conflict minerals sourcing policy?	
Answer	Comments
<input type="text"/>	<input type="text"/>
B. Is your conflict minerals sourcing policy publicly available on your website? (Note – If yes, the user shall specify the URL in the comment field.)	
Answer	Comments
<input type="text"/>	<input type="text"/>
C. Do you require your direct suppliers to be DRC conflict-free?	
Answer	Comments
<input type="text"/>	<input type="text"/>
D. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program?	
Answer	Comments
<input type="text"/>	<input type="text"/>
E. Have you implemented due diligence measures for conflict-free sourcing?	
Answer	Comments
<input type="text"/>	<input type="text"/>
F. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)?	
Answer	Comments
<input type="text"/>	<input type="text"/>
G. Do you review due diligence information received from your suppliers against your company's expectations?	
Answer	Comments
<input type="text"/>	<input type="text"/>
H. Does your review process include corrective action management?	
Answer	Comments
<input type="text"/>	<input type="text"/>
I. Is your company required to file an annual conflict minerals disclosure with the SEC?	
Answer	Comments
<input type="text"/>	<input type="text"/>

Details Section – Conflict Free Policy

Question A – Conflict Minerals Sourcing Policy

- This question asks if the company has a conflict minerals policy in place. If the company does not have a conflict minerals policy, the answer should be “No”.
- If the answer is “No”, we recommend an explanation in the Comments field.

A. Have you established a conflict minerals sourcing policy?	
Answer	Comments
<div style="border: 1px solid black; padding: 2px;">▼ Yes No</div>	

Details Section – Conflict Free Policy

Question B – Publicly Available on Website

- This question asks if the company’s sourcing policy is posted on the web site.
- If the company does not have a Conflict Free Policy (Question 1 in this section is “No”) the answer to Question 2 should be “No”.
- If the answer is “No”, we recommend an explanation in the Comments field.
- Common reasons for answering no include:
 - There is no Conflict Free policy
 - It is not available on the company website
 - The company does not have a web site

B. Is your conflict minerals sourcing policy publicly available on your website? (Note – If yes, the user shall specify the URL in the comment field.)

Answer	Comments
<input type="button" value="▼"/>	
Yes	your direct suppliers to be DRC conflict-free?
No	Comments

Details Section – Conflict Free Policy

Question C – Supplier Sourcing Requirements

- This question asks if the company requires direct suppliers to be Conflict-Free.
- If the company does not require this of suppliers the answer should be “No”.
- If the answer is “No”, we recommend an explanation in the Comments field.

C. Do you require your direct suppliers to be DRC conflict-free?

Answer	Comments
<input type="text"/>	<input type="text"/>
Yes	Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program?
No	

Details Section – Conflict Free Policy

Question D – Supplier CFS Sourcing

- This question asks if the company requires direct suppliers to source 3TG from validated, conflict free smelters.
- If the answer to the previous question was “No”, the answer to this question probably should be “No” as well.
- If the company does not require this of suppliers, the answer should be “No”.
- If the answer is “No”, we recommend an explanation in the Comments field.

D. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program?

Answer	Comments
<input type="text"/>	<input type="text"/>
Yes	Implemented due diligence measures for conflict-free sourcing?
No	Comments
<input type="text"/>	<input type="text"/>

Details Section – Conflict Free Policy

Question E – Sourcing Due Diligence

- This question asks if the company has implemented due diligence measures to reinforce Conflict-free sourcing
- If the company has not done this, the answer should be “No”.
- If the answer is “No”, we recommend an explanation in the Comments field.

E. Have you implemented due diligence measures for conflict-free sourcing?

Answer	Comments
<input type="text"/>	<input type="text"/>
Yes	Conflict minerals due diligence information from your suppliers which is in conformance with the IPC-1755
No	ata Exchange standard [e.g., the CFSI Conflict Minerals Reporting Template]?

Details Section – Conflict Free Policy

Question F – Supplier Conflict Minerals surveys

- This question asks if the company asks suppliers to complete a Conflict Minerals survey.
- If your company does not require a conflict Minerals survey from your suppliers, the answer should be “No”.
- If you use a format other than a Conflict Minerals Reporting Template (CMRT), then a description is recommended in the Comments field.
- If the answer is “No”, we recommend an explanation in the Comments field.

Answer	Comments
<input type="text"/>	
Yes, in conformance with IPC1755 (e.g., CMRT)	
Yes, using other format (describe)	
No	

Details Section – Conflict Free Policy

Question G – Due Diligence Review

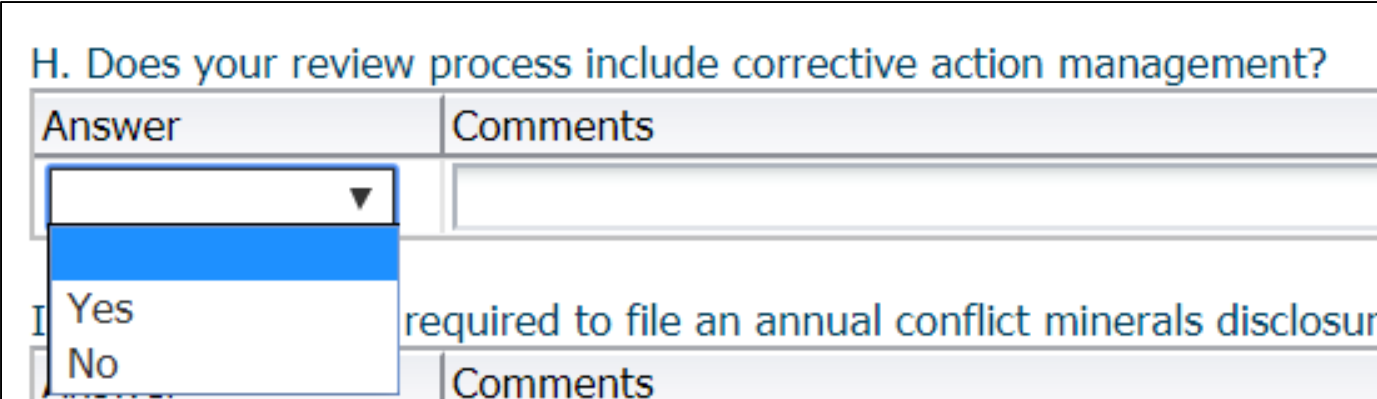
- This question refers to the level of evaluation your company performs on its incoming supplier data against your company’s established criteria.
- The answer should be “Yes” if you have a process to review due diligence information received from your suppliers .
- If you do not review due diligence information received from your suppliers, the answer should be “No”.
- If the answer is “No”, we recommend an explanation in the Comments field for any response.

G. Do you review due diligence information received from your suppliers against your company's expectations?	
Answer	Comments
<input type="text"/>	<input type="text"/>
Yes	Does your process include corrective action management?
No	Comments
<input type="text"/>	<input type="text"/>

Details Section – Conflict Free Policy

Question H – Corrective Action

- This question asks if the company has Corrective Action as part of the supplier review process. Corrective action most often includes providing feedback to suppliers regarding responses the company considers less than ideal.
- If the answer to the previous question was “No”, the answer to this question probably should be “No” as well.
- If the company does not do this, the answer should be “No”.
- If the answer is “No”, we recommend an explanation in the Comments field.



H. Does your review process include corrective action management?

Answer	Comments
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
Yes	required to file an annual conflict minerals disclosure
No	Comments

Details Section – Conflict Free Policy

Question I – SEC Reporting Status

- This question asks if the company reports to the SEC, and is directly subject to the Conflict Minerals rule.
- If the company does not report to the SEC, the answer should be “No”.

I. Is your company required to file an annual conflict minerals disclosure with the SEC?	
Answer	Comments
<input type="text"/>	
Yes	
No	

Thank you

Please continue with **Creating a CMD**
in **CDX: Part 4 – Adding Smelters**