The Dodd-Frank Act was a regulation passed by the Obama administration following the economic housing collapse that took place in the United States. The act was set to increase liability among companies and to prevent another collapse due to unethical business practices. This includes regulations on financial reporting as well as ethical business standards. Although this act only covers publically traded companies, everyone who does business with a public company is affected, as these standards spiral down the chain of production.
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1. **WHAT IS THE DODD-FRANK WALL STREET REFORM AND CONSUMER PROTECTION ACT AND HOW DOES IT RELATE TO ME?**

The Dodd-Frank Act was a regulation passed by the Obama administration following the economic housing collapse that took place in the United States. The act was set to increase liability among companies and to prevent another collapse due to unethical business practices. This includes regulations on financial reporting as well as ethical business standards. Although this act only covers publically traded companies, everyone who does business with a public company is affected, as these standards spiral down the chain of production.

2. **WHAT ARE CONFLICT MINERALS? HOW DO THEY RELATE TO ME?**

Included in the Dodd-Frank Act was a section pertaining to Conflict Minerals (Section 1502). Conflict Minerals are: (A) columbite-tantalite, also known as coltan (the metal ore from which tantalum is extracted); cassiterite (the metal ore from which tin is extracted); gold; wolframite (the metal ore from which tungsten is extracted); or their derivatives; or (B) any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country.

More easily understood; Conflict Minerals are 3TGs (Tin, Tantalum, Tungsten and Gold) that are found to be financing conflict in the Democratic Republic of Congo (DRC) or an adjoining
country¹ (collectively known as the “Covered Countries”). The Dodd Frank Act requires that all publically traded companies investigate and report the sourcing for their 3TGs. It also requires that all suppliers to those companies participate in the collection of this data.

3. WE ARE A PRIVATE COMPANY, HOW DOES THIS APPLY TO US?

Although the Dodd Frank Act does not apply to private institutions, it does affect publically traded companies. As a result; even though you may not be required to report 3TG sourcing, it is a requirement that you provide this information to your customers who are publically traded. It is recommended that all companies begin to investigate the sourcing of their 3TGs in order meet the requirements of doing business with publically traded companies.

4. HOW DO I COLLECT THIS DATA FROM MY SUPPLIERS? WHAT IS CMRT FORM?

Companies can choose to collect the required data by questioning their suppliers on 3TG sourcing. This can be done by using the Conflict Minerals Reporting Template (CMRT) form; which is considered the standard on communicating the necessary data for meeting the regulatory requirements surrounding Conflict Minerals. The CMRT form allows for companies to communicate whether or not 3TGs are used in their products and where they originate from.

¹ A country that shares an internationally recognized border with the DRC, which presently includes Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia
5. WHAT IS A DECLARATION OF SCOPE? WHICH ONE SHOULD I DECLARE MY 3TG SOURCING WITH?

Declaration of scope is found at the top of the CMRT form, it’s what allows manufactures/suppliers to declare what products are being covered with this specific form. Products can be declared using the following:

**Company Level:** This covers all parts manufactured by the company in question. The upside to this form of declaration is that you can have a standard form to provide to all your customers should they inquire about your 3TG sourcing.

**Product Level:** This last level is on a part-by-part basis. The benefit of this declaration of scope is that it will give the highest overall percentage of completion based on the fact your concentrating your efforts overall. However the downside to this level is that it is customized for every customer.

**User Defined:** Previous versions of the form allowed users to choose between Product Category and Division Level declarations of scope. This caused a great level of confusion from manufacturers as they weren’t sure what scope to select. In order to avoid confusion this year, the CMRT has been updated to include a user defined scope that will allow manufacturers to lay out the definitions of their scope.
6. **WHAT ARE SMELTERS? HOW DO THEY PLAY A ROLE?**

Smelters are organizations that purchase raw materials from mines or recyclers/scrap suppliers and melt them down for use in production. Manufacturers that use 3TGs at some point within the supply chain have to purchase the metals from a smelter. In turn, the smelter becomes the perfect organization to audit in order to determine if a metal is “Conflict Free”; as they have direct access to the mines that extract the metals in question.

7. **WHEN IS ALL THIS INFORMATION NEEDED BY?**

Conflict Minerals reporting is due by May 30th of each year for the previous calendar year (ie. May 30th 2015 filing deadline is based on 2014 data). By then publically traded companies are expected to have gathered information as well as have had a level of due diligence to review the answers given by their suppliers. Assent compliance, on behalf of its clients requires you to provide whatever level of information has been gathered at the time of the request. It is also important you provide updates to that information as they become available. Your customers need to have 100% of their supply chain information as soon as possible.

8. **WE DO NOT USE 3TGs – WHY DO I HAVE TO COMPLETE THE CMRT?**

If it's the case where your products do not contain any conflict minerals, please complete the following information fields required on the CMRT that are designated by yellow highlighting:
the company information section and both the first and second questions. Selecting no to these questions confirms that as a supplier you are not sourcing 3TGs from conflict mines. Once selected, the form will autocomplete and the remaining fields will be “closed off”. Please submit this on our launch portal once you are completed.

9. WE DO NOT USE CONFLICT MINERALS – WHY DO I HAVE TO COMPLETE THE CMRT?

Do you not use tin, tungsten, tantalum or gold in your products at all or are you referring to the fact you do not source these minerals originating from the DRC?

• If you do not use tin, tungsten, tantalum or gold, see above for the response for “We do not use 3TGs”.

• If you do not source from the DRC, you must complete the CMRT form as it is the acceptable and standard format for a supplier to declare their position on this.

10. ALL WE HAVE IS A COMPANY DECLARATION – WHAT DO I DO?

The industry standard for this regulation is the CMRT. This is the template we use as it allows us, on behalf of your customer, to compile the necessary information gathered in regards to 3TG sourcing within your company. The purpose of this CMRT is to be passed along the supply chain to the point that identifies the smelters used to refine or smelt the minerals, a
critical part of identifying conflict free sourcing. Unfortunately a declaration does not give us the level of detail required.

11. I DON’T KNOW IF THESE MINERALS CAN BE FOUND IN MY PRODUCTS – WHAT DO I DO?
You would need to gather this information from your suppliers. This can be done by passing along a CMRT template, which is considered the standard form for collecting 3TG sourcing and process information. You would survey your suppliers with this form to identify if any conflict minerals are present in your supply chain.

12. WE DO NOT DO BUSINESS WITH THE CLIENT YOU HAVE NOTED IN YOUR COMMUNICATIONS TO US – WHY ARE YOU CONTACTING US?
You may do business with one of our client’s individual business units, which may have a different name. Please submit your question to the account manager listed in the communication you received from Assent.

13. THIS DOESN’T APPLY TO US/ WE ARE OUT OF SCOPE – WHY IS ASSENT CONTACTING US?
If the product you supply to the customer falls into one of the following categories that are usually considered as out of scope, please submit this information to the compliance specialist listed in the communication you received from Assent.
Possible out of scope categories:

- Packaging that does not end up in the final product that the customer uses. Please note that if the label is on the actual product it can be considered as part of the final product.

- Parts that do not end up in the final product. This would include equipment used to make the product materials or components, but not a part of the actual product itself.

- Test Labs that will test resistance or durability of a product.

- Service Providers such as couriers, delivery companies, staffing agencies, accounting firms, consultants, law firms, software firms, restaurants or bars.

- Other Company items such as forklifts or office supplies that do not physically go into the products or services such as electricians and plumbers.