



# **EICC<sup>®</sup>-GeSI Conflict-Free Smelter Program: Smelter/Refiner Introductory Training and Instruction Document**

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This document and other materials related to the Conflict-Free Smelter Program can be found at [www.conflictreesmelter.org](http://www.conflictreesmelter.org).

Contact [info@conflictreesmelter.org](mailto:info@conflictreesmelter.org) for more information on the Program or information contained on the CFS Program site.

## Conflict Minerals and the Conflict-Free Smelter Program

According to the U.S. Government Accountability Office, "Rich in minerals, the eastern Democratic Republic of the Congo (DRC) has long been the site of one of the world's worst humanitarian crises. Since 1998, an estimated 5 million have died as a result of the conflict."<sup>1</sup> The illegal trade of minerals from this natural resource-rich country is helping to fund the violence in the DRC. Encouraged by stakeholders and members, the Electronic Industry Citizenship Coalition<sup>®</sup> (EICC<sup>®</sup>), the Global e-Sustainability Initiative (GeSI) and their partners are developing tools to help enable companies to source conflict-free minerals from the DRC.

One such program is the Conflict-Free Smelter ("CFS") Program. The CFS Program is a voluntary program in which an independent third party evaluates smelter/refiner procurement and tolling activities and determines if the smelter or refiner demonstrated that all the materials they processed originated from conflict-free sources. The program aims to enable companies to source conflict-free minerals (currently for tantalum, tin, tungsten and gold).

The CFS is a global program. Assessments are conducted for any smelter or refiner that is processing the targeted minerals and wants to be identified as conflict-free. Key processors are globally distributed, located in such countries as Australia, Canada, China, Indonesia, Japan, Malaysia, Russia, United States, and others.

As a sufficient number of smelters or refiners for a mineral become compliant with the CFS Program protocol, the EICC and GeSI publish the list of compliant smelters and refiners on the publically available CFS Program website ([www.Conflictreesmelter.org](http://www.Conflictreesmelter.org)). The EICC and GeSI update the list periodically with additional names of smelters/refiners who were shown to be compliant since the last posting of the list.

Electronics companies buying and/or using these minerals in their products have started asking sub-tier suppliers for due diligence information on their minerals sourcing. Any smelter or refiner may participate in the CFS program and be found compliant with the CFS Program protocol. This is one way of assuring your customers that the metal(s) you supply are conflict-free. Participating in the CFS Program: 1) provides your downstream customers with verified information about your sourcing activities, 2) assists them in demonstrating OECD Due Diligence Guidance conformance, 3) assists them in meeting Dodd-Frank reporting requirements, and 4) enables your customers to source conflict-free minerals which helps to remove the incentive for violence in the Democratic Republic of the Congo (DRC).

### How does the Conflict-Free Smelter Program work?

The CFS program consists of two reviews that occur at a smelter's or refiner's site(s) during the assessment process:

#### *Business Process Review*

- Evaluate company policies and or codes of conduct relating to conflict minerals

#### *Material Analysis Review*

- Conduct a complete material analysis to demonstrate that all sources of materials procured by the smelting company are conflict-free

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<sup>1</sup> More information and the full report can be found at <http://www.gao.gov/products/GAO-10-1030>.

- Evaluate whether source locations are consistent with known mining locations
- Establish whether material identified as “recyclable” (secondary material) meets the definition of secondary material

The CFS program estimates it to take approximately nine months for a conflict mineral to flow through the entire supply-chain from ore extraction to delivery of a finished consumer electronic item. Because of this supply-chain length of time, the program believes it’s imperative to audit one year of smelter sourcing records. Likewise, smelter or refiner compliance to the CFS Program protocol will be verified annually but this annual compliance is subject to future change dependent on program maturity and continuous improvement efforts. Any change in re-audit standards will be communicated to all CFS Program participants.

All smelter/refiner sites within a particular company/organization will need to submit to an audit before that company/organization will be included on the CFS compliant smelter/refiner list. Compliance determination is unique to each metal a smelter/refiner produces and therefore there will be a separate CFS list for each metal (tantalum, tin, tungsten and gold).

A CFS Program audit of a smelter or refiner consists of three main phases (typical timeline for each phase is noted):

1. Pre-audit activities (7-14 calendar days)
2. Onsite audit (15-45 calendar days)
3. Post-audit follow-up (if needed, up to 90 calendar days)



These phases are discussed in more detail in the below sections.

## ***Pre-Audit Activities***

### **What is a smelter/refiner pre-audit visit?**

EICC and GeSI member company representative(s) can, at the request and/or agreement of the smelter/refiner, travel to a smelter/refiner site to complete a pre-audit visit. The pre-audit visit provides a valuable opportunity for the EICC and/or GeSI representative and the smelter/refiner to have a face to face exchange of information regarding conflict minerals. Downstream

customers find this interaction essential to complete their supply chain due diligence (in line with Step 2 of the OECD Guidance<sup>2</sup>).

The pre-audit visit activities are intended to:

- Understand the smelter/refiner operations at that company's site(s)
- Understand the smelter's/refiner's ability to trace materials from their factory back to the mine of origin
- Understand generally the smelter's/refiner's current sources for incoming materials
- Provide an initial review of the smelter/refiner's ability to meet the compliance expectations of the CFS program and provide suggestions on gap closures items prior to a CFS Program audit
- Understand if the smelter/refiner is willing to participate in the CFS Program
- Establish a contact person for the smelter/refiner to follow-up with regarding questions

A pre-audit visit typically takes one day to complete. The pre-audit visit is a complimentary service provided on behalf of the EICC and/or GeSI member company representative(s).

Any results of a pre-audit visit will not be used to determine a smelter/refiner's compliance to the CFS Program protocol and is not part of the actual CFS Program audit which must be completed by an approved 3<sup>rd</sup> party auditor.

### **What is the cost of a CFS Program audit?**

Audit cost ranges, on average, from \$5 000 USD - \$10 000 USD per smelter/refiner site, depending on the number of sites and complexity of procurement activities. This fee covers the third party auditor's time required to review company-specific documentation and to cover travel expenses to the site(s).

By properly preparing for the on-site audit, a smelter/refiner can minimize the total audit cost by reducing the time auditors are present at their facility reviewing their sourcing documentation. Auditor follow-up needed after the on-site audit may also incur auditor person-hour time charges; reducing the need for post-audit follow-up by being prepared for the audit is a strategy to minimize audit costs.

Smelters/refiners that choose to participate in the CFS Program fund the costs associated with the audit. However, a fund has been established to offset a portion of the costs of a first-year audit, for as long as assets remain in the fund.<sup>3</sup>

There are currently three third party audit firms, each with global operations which are available to conduct CFS Program audits. Having multiple audit firms creates a cost competitive audit program by using regional auditors to minimize auditor travel costs. Having a small number of audit firms is currently seen as a benefit. This allows for maintaining consistency during the early phases of program implementation.

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<sup>2</sup> See Step 2, section II, C, 4 of "The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas". From the OECD webpage [http://www.oecd.org/document/36/0,3746,en\\_2649\\_34889\\_44307940\\_1\\_1\\_1\\_1,00.html](http://www.oecd.org/document/36/0,3746,en_2649_34889_44307940_1_1_1_1,00.html).

<sup>3</sup> See <http://www.resolve.org/wp-content/uploads/2012/04/CFS-Early-Adopters-Fund-Launch-Press-Release-FINAL.pdf> for more information, or contact RESOLVE (Beth Weaver, [bweaver@resolve.org](mailto:bweaver@resolve.org) or Stephen D'Esposito, [sdesposito@resolve.org](mailto:sdesposito@resolve.org)) on the incentive eligibility and request process.

### **How is the audit firm selected for a specific audit?**

The CFS auditor team is selected based on availability with every intention to use auditors which are closest in vicinity to the smelter/refiner site(s) and are fluent in the predominant language for that particular region. The CFS program manager will decide which audit team is best suited to complete the audit based primarily on those factors. Once selected, that same auditor team will be used to audit all sites for a particular smelter/refiner. The CFS program will notify the smelter and refiner when an auditor has been selected and provide the necessary auditor contact information.

### **How is an audit scheduled and typical audit duration?**

Smelters/refiners schedule directly with the auditors to complete the audit. Auditors will travel to the smelter/refiner facility to review the smelter/refiner performance to the CFS Program protocol. Typical on-site audit duration is 3-5 business days but is ultimately dependent on the total volume of smelter documentation requiring review to determine the company's program compliance.

### **What are the Pre-Audit documents to be completed?**

The CFS Audit Program Manager will work with the smelter/refiner to sign the Non-Disclosure Agreement (NDA, or also termed the AECl) and the Auditee Agreement. These are required to get to the next step of the process which includes sharing of smelter/refinery company and procurement details. The smelter/refiner then completes the Pre-Audit Checklist which defines their operations breadth, products and complexity. This document is used by the audit firms to provide a bid for completing the audit. The last item is the Line-Item Summary which is where the procurement and incoming materials transactions for the full audit period as well as the inventory estimate are documented. This information is what the auditors use onsite during the audit to reconcile the mass balance. The Line-Item Summary is to be provided to the selected auditor at least 2 weeks prior to the audit commencing.

## ***Audit Activities***

An auditor will assess the following during the onsite audit:

- 1) Conflict minerals policy
- 2) "Mass balance" of materials
- 3) Procurement and incoming materials documentation

These three items are covered in more detail in the below sections.

### **Conflict Minerals policy**

The smelter will have a documented, effective and communicated policy for procurement of materials, which explicitly avoids utilization of conflict minerals. Specifically the policy will cover:

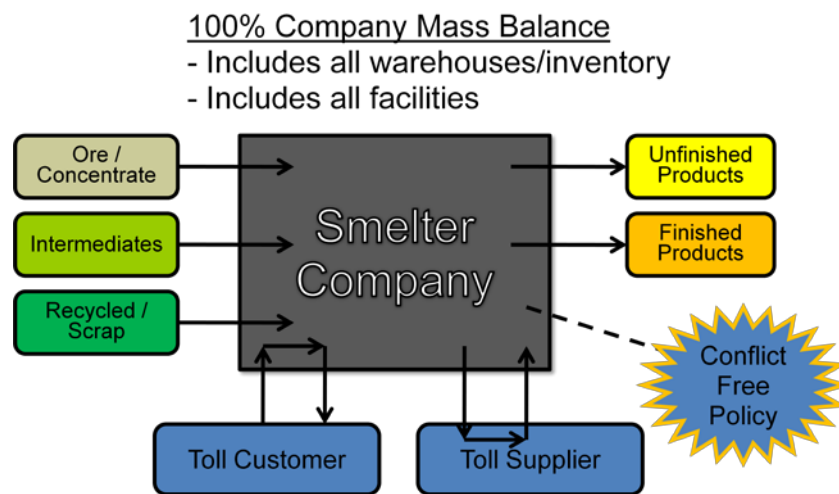
- a) Tin/tungsten/tantalum/gold materials;
- b) Conflict regions;
- c) Public communication of the policy;
- d) Policy embedded into standard operating procedures and individuals trained;
- e) Effective date established;
- f) Applicable regulations; and
- g) For those companies sourcing from level 3 countries, their sourcing policy will have to comply with Annex II of the OECD Guidance for tin, tantalum and tungsten<sup>4</sup> and gold<sup>5</sup>.

*Tantalum-specific note*

- Due to radioactivity, policies relating to tantalum must additionally cover adherence to international transportation regulations (class 7).

**"Mass Balance" of materials**

During an audit, an auditor conducts a "mass balance" by summing all the inputs (starting inventory + material receipts) minus all the outputs (product shipments and losses). This amount needs to balance within  $\pm 10\%$  of the closing inventory. The amount forms the basis of the audit.



In preparation for the mass balance activity the smelter/refiner should accurately prepare information about their inventory and procurement (all incoming materials) in the Line-Item Summary. They should also prepare their product shipment and loss information such that the auditor can complete the mass balance calculation efficiently.

<sup>4</sup> Smelters 3T's conflict minerals policy should be in compliance with requirements of the *OECD Due Diligence Guidance for Responsible Supply Chains on Minerals from Conflict-Affected and High-Risk Areas and Supplement on Tin, Tantalum and Tungsten* ([http://www.oecd.org/document/36/0,3746,en\\_2649\\_34889\\_44307940\\_1\\_1\\_1\\_1,00.html](http://www.oecd.org/document/36/0,3746,en_2649_34889_44307940_1_1_1_1,00.html)).

<sup>5</sup> Refiners Gold conflict minerals policy should be in compliance with requirements of the *OECD Due Diligence Guidance for Responsible Supply Chains on Minerals from Conflict-Affected and High-Risk Areas: Final draft Supplement on Gold v3.0* ([http://www.oecd.org/document/60/0,3746,en\\_2649\\_34889\\_49137660\\_1\\_1\\_1\\_1,00.html](http://www.oecd.org/document/60/0,3746,en_2649_34889_49137660_1_1_1_1,00.html)).

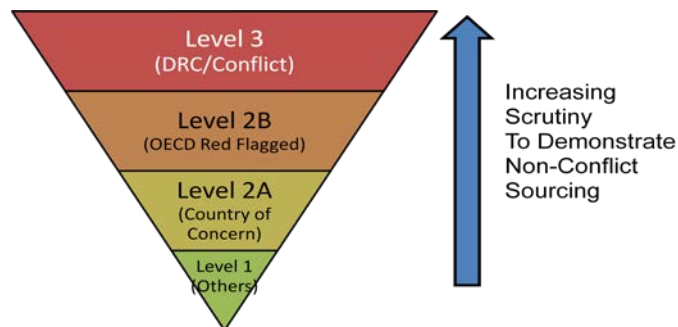


Further mass balance details and explanation can be found in the CFS audit protocol itself posted at the CFS Program website (<http://www.conflictreesmelter.org>).

## Procurement documentation

### ***What are the general Audit documentation expectations?***

There are four (4) levels of documentation required depending on the minerals country of origin; countries fall into one of the four levels.



Each level requires increasing documentation as the source of the mineral/metal approaches conflicted countries. If sourcing is identified from a country not known to produce a particular mineral, further scrutiny is applied.

### ***How does the CFS Program define the four country levels?***

- **Level 1:** countries with known active ore production that are not identified as plausible countries for export out of region, smuggling, or transit of conflict minerals.
- **Level 2A:** known or plausible countries for export out of region, smuggling, or transit of conflict minerals.
- **Level 2B:** the nine countries adjoining the DRC which have been outlined in section 1502 in the Dodd Frank Act.
- **Level 3:** ore sources currently within conflict regions that are potentially supplying ore materials.

Note that different metals have different known export routes out of Level 2B and Level 3 countries and therefore the lists of countries-of-concern differ (Level 2A). Also a list of companies-of-concern (e.g. identified in U.N. Group of Experts reports) are maintained, and procurement from them may lead to greater scrutiny of documentation on exact source of origin. Finally, note that the country lists are not applicable to secondary materials as identification of ore source is not required; however, secondary materials sourced from Level 2B and 3 countries will be scrutinized 100% (not just sampled).

The specific document requirements for each level is contained in the CFS audit protocol specific to the metal. The audit protocols can be found on the CFS website (<http://www.conflictreesmelter.org>).

### ***What other types of documentation exist?***

#### **ASM Sourcing Documentation**

For artisanal and small-scale mining (ASM), it may not be possible in most cases to trace back to the mine of origin. For all ASM sourcing, smelters should obtain a declaration of country region of origin from their supplier (especially for domestic ASM sources) to supplement needed export documents. As with other sources, the documentation requirements for ASMs are defined by the country's level.

#### **Secondary Material Documentation**

Secondary (recyclable) materials are defined as post smelting/refining (downstream) materials that have been determined to be ready for end-of-life and are being recycled as input to a smelter/refinery. Process byproducts of smelting and refining are sometimes referred to as secondary materials, although they should be distinguished from end-of-life recyclable materials. Secondary materials are generally scrap or recyclables which contain a sufficiently high percentage of the target metal to make it of value to reclaim the post-use metal. Buying and selling of these secondary materials are specific by metal industry but may represent a significant percentage to a smelter's business in both value and total inputs/outputs. In some cases, individual secondary material purchases may account for thousands of procurement transactions and large mass quantities of the target metal. It is therefore important to include all secondary materials into the mass balance process and document them in the Line-Item Summary. The auditors will both (1) physically validate scrap and recyclable inputs meet the definition as such and (2) where appropriate, use a random sampling process to audit secondary material input transactions (as defined in the CFS audit protocols).

### ***What happens once the on-site audit is completed?***

At the conclusion of the onsite CFS Program audit, the auditor creates an audit summary report and delivers it to the smelter/refiner and the CFS Program Audit Review Committee (ARC). The ARC reviews the report and the auditor's testimony to the ARC to assess the findings. Together, the auditor and ARC review the auditors work to agree on the auditor's compliance recommendation of the smelter/refiner.

The ARC's audit review process consists of the following steps:

- Audit Program Manager (APM) distributes completed audit report to ARC members for pre-read
  - ARC conducts weekly standing meeting for review of audit reports by auditor (first in, first out)
  - ARC members vote on agreement with auditor's recommendation of the smelter/refiner performance to the audit protocol and determine compliance to the CFS Program protocol
  - APM drafts and sends a Compliance Letter if the smelter/refiner is found to be compliant with the CFS Program protocol
- or
- If the smelter/refiner is not found to be compliant with the CFS Program protocol, the APM drafts and sends a Non-compliance Letter. This letter includes findings and if relevant, possible solutions or corrective actions (see Post Audit Activities).

Note: All smelter/refiner sites within a particular company/organization will need to submit to an audit before that company/organization will be included on the CFS compliant smelter/refiner list. Compliance determination is unique to each metal a smelter/refiner produces.

### **Post-Audit Activities**

The Post-Audit activities are required for those smelters/refiners that have not demonstrated effective compliance to the audit protocol during the initial audit visit. At this point the smelter/refiner requires completion of follow-up actions to be eligible for compliance to the CFS Program protocol.

The Post-Audit activity may require a second auditor visit to confirm that corrective actions have been implemented. However, some audit corrective actions are able to be settled remotely when there are simple documentation gaps that are easily transmitted and confirmed electronically. Additional auditor charges might be applicable during post audit activities.

If the gaps are satisfactorily addressed as determined by the auditor and after the ARC confirms the auditor's recommendation, the Audit Program Manager (APM) will issue the smelter a Compliance Letter.

All post audit activities must be completed within 90 calendar days from the date of issuance of the Non-compliance Letter.

### **Audit Gap Closure**

There are several steps that will occur if a smelter/refiner is found to be non-compliant to the CFS Program protocol. If the ARC determines the smelter has not fully demonstrated compliance to the CFS Program protocol, the ARC will identify items which compliance was not properly demonstrated (gaps) and issue a Non-compliance Letter which will provide a brief explanation of additional information needed to determine compliance. All findings during the audit will be noted in the Non-compliance Letter issued to the smelter from the ARC. If the ARC determines the smelter/refiner is not complaint, then

- The smelter is responsible to produce the necessary supplemental information to the auditor within 60 calendar days of issuance of the Non-compliance Letter as a means to address the identified gap(s). If necessary, an auditor might have to complete an additional on-site visit (at the smelter's cost) to review that supplemental information and resolve the gaps identified by the ARC.
- If the gaps are resolved and the smelter/refiner subsequently meets the requirements of the CFS Program protocol per the recommendation of the auditor and determination by the ARC, the APM issues a Compliance Letter to the smelter/refiner.
- If the smelter/refiner that has a repeat non-compliance issue identified, or was unable to complete closure on open items within the 90 day post audit mitigation period, the smelter/refiner will be deemed as non-compliant and will be exempted from participating in the CFS program for a period of six months.
- If the ARC concludes the smelter/refiner remains non-compliant to the CFS Program protocol but the smelter/refiner does not agree with that conclusion, the smelter/refiner may challenge the non-compliance conclusion by filing a written request of exception to the ARC via the APM.

## **General Information about a CFS Program Audit**

### **How does the CFS process protect a smelter/refiner's information?**

The protection of identifiable and confidential materials is very important for the CFS Program. To address this concern, there are processes in place within the CFS Program to secure confidential information.

- Non-Disclosure Agreements (NDAs) are established between the audit firms, EICC and GeSI (which covers members of the ARC), any other ARC participants (for example academic and partner company members), and the Audit Program Manager.
- Auditors are responsible for protecting details of the smelter/refiner information assessed onsite during the audit (e.g. export certificates, transportation documents). If a smelter/refiner wants and NDA with the auditor they must initiate one. Such an NDA cannot conflict with the auditor completing their audit tasks. The audit report only reflects the results of the onsite documentation analysis and the mass balance summary. The ARC is provided a copy of the Line-Item Summary created by the smelter/refiner for comparison to the mass balance summary.
- Audit reports are the property of the smelter/refiner. The auditor provides a copy of the report to the Audit Program Manager for distribution to the ARC for the purposes of the audit review with the Auditor. ARC members are expected to return or delete audit reports if exiting participation in the ARC.
- The independent academic participant on the ARC will aggregate high-level findings about the audit review process and report out publicly on findings and improvement suggestions made to the ARC process. These findings will not be related to detailed data from audit reports, and will focus primarily on the ARC's processes not on specific audit information.
- Compliant smelters are published publicly on the CFS website, by name and with applicable Level 2B & Level 3 sourcing information.
- Non-compliant smelters/refiners or those in the continuous improvement phase are undisclosed beyond the ARC and Audit Program Manager. Additionally, the CFS program will not publically disclose if a smelter/refiner has not undergone or elects not to participate in CFS Program audit, nor smelters and refiners which have agreed to participate but have not yet completed the CFS Program audit. All questions regarding smelters/refineries that are not on the public CFS list will be directed back to the smelter/refiner company or its supply-chain as they are best positioned to communicate their participation and status with the CFS Program to their customer base.
- Aggregate numerical indicators are maintained on the CFS website for several categories of CFS status. Company-specific information is not provided with the indicator information.

## Where should a smelter/refiner go for help in becoming compliant with the CFS Program protocol?

For general questions, a smelter/refiner may contact the Audit Program Manager at [info@conflictfreesmelter.org](mailto:info@conflictfreesmelter.org).

For help in developing or validation a conflict-free sourcing program that is conformant to the *OECD Due Diligence Guidance for Responsible Supply Chains from Conflict-Afflicted and High-Risk Areas*, see the list of consultants on the CFS website ([www.conflictfreesmelter.org](http://www.conflictfreesmelter.org)).

## Who is involved in the Conflict-Free Smelter Program?

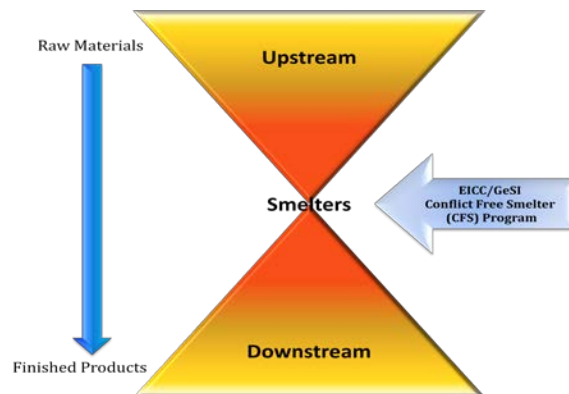
The following upstream and downstream entities are actively involved in the Conflict-Free Smelter Program:

- **Smelters and refiners.** Smelter/refiner processing is a critical step in the supply chain where distinguishable minerals and metals are converted to indistinguishable metal or derivatives. Any smelter or refiner that wants to be certified conflict-free and have their name listed on the compliant list can volunteer to participate in a CFS Program audit.
- **Auditors.** Audit firms conduct the actual assessment of smelters and refiners. The firms and auditors have been trained in the CFS Program protocols and are familiar with the issues related to conflict minerals, have familiarity with the in-region transportation/trade paths, and understand the goals of in-region schemes that account for the minerals' traceability.
- **Audit Review Committee (ARC).** The ARC is the committee that determines a smelter/refiner's compliance to the CFS Program protocol based on review of the smelter audit summary report and testimony from the auditor. The ARC will issue all compliance and non-compliance findings directly to the smelter. In the event of non-compliance findings, the ARC will also review any follow-up documentation needed to resolve non-compliance findings in a manner similar to that of the original review.
- **Audit Program Manager (APM) and/or Audit Program Administrators.** The APM is responsible for managing all administrative tasks associated with execution of the CFS Program such as distribution and completion of CFS Program paperwork (e.g. agreements and checklists), auditor selection and coordination activities, the ARC review meeting, issuance of Compliance and Non-compliance Letters and general maintenance associated with the CFS List and website.
- **Downstream Companies.** Material buyers and companies throughout the supply chain can use the information from the CFS program to understand the source of minerals in their supply chain from the smelters/refiners they directly or indirectly procure from. The EICC and GeSI encourage other downstream companies and industries to work with them collaboratively on a single process for responsible sourcing with a goal that smelters/refiners can use it to satisfy all their customer's concerns. Conflict minerals impact any industry that uses tin, tantalum, tungsten and gold in their products including the automotive, aerospace, jewelry, packaging, defense, toy, and housing industries.

## Why were smelters/refiners identified as the key layer of supply chain?

The producers of minerals (e.g., mines, traders) provide the minerals to smelters/refiners and the smelters/refiners provide the resulting metals (or derivatives) to a large number of downstream consumers. Smelting/refining is the conversion point of identifiable types of materials such as ore, ore concentrate, and secondary materials into a common output product of each metal for all downstream consumers. Because of this transformation process, smelters/refiners are in the position to know where the material is coming *from* and where it is going *to*. As well, smelters and refiners are small in number relative to the number of upstream suppliers and downstream users. For these reasons, smelters/refiners are identified as the "pinch point" of the supply chain.

Visually, the supply chain looks like an hour glass timer with smelters at the middle:



NOTE: A smelter or refiner in the CFS Program is considered to be all the facilities of a single commercial entity. Or, said another way, all of the facilities that make up 'the company'.

## How does the CFS Program define smelters/refiners?

- **What is a Tantalum (Ta) smelter?**

A tantalum smelter is a company which converts tantalum containing ores, slags, powder or scrap into Ta containing products (such as Ta powders, Ta components, Ta oxides, alloys, wires, sintered bar or similar final products) or intermediate products (such as KTaF (also known as KSalt), Ta hydroxides and Ta unrefined powders, synthetic ores and other Ta digestion materials).

Some Ta smelters also use intermediate products to supplement their own conversion processes. Companies which convert the intermediate products to other usable finished products such as Ta ingots, sheets, rods, and wire are also considered to be smelters. Suppliers of these intermediate products are considered an integral part of the smelter's supply chain requiring verification of these suppliers in the smelter's compliance to the CFS Program protocol.

- **What is a Tin (Sn) smelter?**

In the tin industry primary smelters are referred to as companies treating tin containing ore concentrates in order to produce crude or fully refined tin ( $\geq 99.85\%$  pure).

Secondary smelters are companies which treat secondary<sup>6</sup> materials for the production of crude or fully refined tin. Refiners are companies that treat crude tin or suitable secondary materials to produce fully refined tin. Companies may be one of, or a combination of the above.

- **What is a Tungsten (W) smelter?**

A tungsten smelter is defined as a company converting W ore (wolframite and scheelite-iron manganese tungstate), W concentrates, or W-bearing secondary material for conversion to tungsten containing intermediates such as Ammonium Para-Tungstate (APT), Ammonium Meta-Tungstate (AMT), ferrotungsten, and tungsten oxides. Attention should be paid to recycled material streams which can be reworked without going through the APT/AMT chemical processes. APT production is the typical identifying capability of a tungsten smelter.

- **What is a Gold (Au) refiner?**

A gold refiner is a metallurgical operation that produces fine gold with a concentration of 99.5% or higher from gold and gold-bearing materials with lower concentrations.

Examples of smelters and refiners by company name can be found in Appendix C.

## **Who are the audit firms and how are they selected?**

Presently, three firms are qualified. It is expected this number will increase as the program matures. A smelter's/refiner's preferred audit entity is not a consideration for an audit firm being assigned to an audit.

The CFS Program's current firms are:

- 1) UL-STR: [www.strquality.com/en-us/responsible-sourcing/Pages/default.aspx](http://www.strquality.com/en-us/responsible-sourcing/Pages/default.aspx)
- 2) SGS: [www.sgs.com](http://www.sgs.com)
- 3) Liz Mueller, Inc.: [www.lizmuller.com](http://www.lizmuller.com)

The Auditor selection process includes three main criteria categories:

- 1) The company meets the auditor standards and follows the audit program standards of ISO 19011
- 2) The company is able to meet the audit expectations of the OECD Guidance audit process
- 3) The company is a global company, with domestic staff in key countries of tantalum, tin, tungsten smelters or gold refineries, and with experience in procurement transaction records and traceability schemes

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<sup>6</sup> Referenced as "conflict minerals from recycled or scrap" in the U.S. Securities and Exchange Commission (SEC) December 2010 Conflict Minerals draft rule. Note that the Dodd-Frank Act defines "conflict minerals" as including their derivatives, and thus the metals and compounds including tin, tungsten, tantalum and gold.

## How are auditors trained in the CFS Program protocols?

Auditors selected to work with the CFS Program have similar existing auditing experience. To become familiar with the CFS Program:

- The ARC educates audit firms as new metals are introduced into the CFS Program scope
- The audit firms are invited to participate in mock audits for each metal where a smelter/refinery has offered to host a mock audit
- Auditors are provided a copy of the Plausibility Report for each metal which profiles industry specific and market information by country and any known issues with particular U.N. embargoed companies
- Whistleblower information is provided to audit firms for use during audits while evaluating smelter documentation

## What is the makeup of the Audit Review Committee (ARC)?

The ARC currently consists of company representatives from the EICC, GeSI, and the Automotive Industry Action Group, as well as a representative from academia.



The ARC participant requirements include three main criteria:

- 1) Representative from an OEM Company (Electronics or other partner association/company)
- 2) Has participated in at least one pre-audit visit at a smelter/refiner
- 3) Has an in-depth understanding of the CFS processes, procedures and protocol.
- 4) Has previous auditing experience (e.g. quality auditor)

The ARC is limited to seven total members.



## What is the Relationship of the Conflict-Free Smelter Program to other initiatives?

### What is the relationship between the CFS Program and the OECD Due Diligence Guidance for Responsible Supply Chains from Conflict-Afflicted and High-Risk Areas

The *OECD Due Diligence Guidance for Responsible Supply Chains from Conflict-Afflicted and High-Risk Areas* (Guidance),

Provides management recommendations for global responsible supply chains of minerals to help companies to respect human rights and avoid contributing to conflict through their mineral or metal purchasing decisions and practices. The Due Diligence Guidance is for use by any company potentially sourcing minerals or metals from conflict-affected and high-risk areas.<sup>7</sup>

Because the Guidance is an international instrument, the CFS Program makes reference to it as a means for smelters to assist in their due diligence when sourcing from the DRC and adjoining countries. A smelter/refiner whose sourcing from the DRC and adjoining countries via an OECD-conformant scheme is eligible to participate in the CFS program. This eligibility requirement was made a part of the CFS Program starting April 1, 2011.

### What is the “*Conformance and Compatibility Analysis*”?

A report which was commissioned by the EICC and GeSI and conducted by Estelle Levin, Ltd. to look at the alignment between the OECD Guidance and the CFS Program. While the programs are generally aligned, the few discrepancies that do exist are mostly attributed to the difference between the OECD Guidance and Dodd-Frank Act definitions.

Details of the report, *Conformance and Compatibility Analysis: CFS, iTSCi, and the OECD Due Diligence Guidance*, can be found at:

<http://www.conflictreesmelter.org/documents/ConformanceandCompatibilityAnalysis20111128FINAL.pdf>

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<sup>7</sup> See [http://www.oecd.org/document/36/0,3746,en\\_2649\\_34889\\_44307940\\_1\\_1\\_1\\_1,00.html](http://www.oecd.org/document/36/0,3746,en_2649_34889_44307940_1_1_1_1,00.html) for more information.

## Appendix A: CFS Program Supporters

### ***Who are the EICC & GeSI?***

The **Electronic Industry Citizenship Coalition (EICC)** is a not-for-profit organization established in 2004 to improve social, economic, and environmental conditions in the global electronic supply chain through use of a standardized code of conduct. The EICC was incorporated in 2007 as an association to ensure greater awareness of the Code, and to expand its adoption across the industry. Through the EICC, members are committed to a common approach in addressing these corporate social responsibility issues in the global electronics supply chain, and will engage external stakeholders to provide input on the issues and possible solutions. The EICC includes over 65 global electronics companies. For more information or to view the EICC Code of Conduct, see [www.eicc.info](http://www.eicc.info).

The **Global e-Sustainability Initiative (GeSI)** is a strategic partnership of the Information and Communication Technology (ICT) sector and organisations committed to creating and promoting technologies and practices that foster economic, environmental and social sustainability. Formed in 2001, GeSI's vision is a sustainable world through responsible, ICT-enabled transformation. GeSI fosters global and open cooperation, informs the public of its members' voluntary actions to improve their sustainability performance, and promotes technologies that foster sustainable development. GeSI has 31 members representing leading companies and associations from the ICT sector. GeSI also partners with two UN organizations - the United Nations Environment Program (UNEP) and the International Telecommunications Union (ITU) - as well as a range of international stakeholders committed to ICT sustainability objectives. These partnerships help shape GeSI's global vision regarding the evolution of the ICT sector, and how it can best meet the challenges of sustainable development. For more information, see [www.gesi.org](http://www.gesi.org).

### ***What is the EICC and GeSI joint Extractives Workgroup?***

The joint EICC and GeSI Extractives Workgroup consists of EICC and GeSI member companies as well as partner companies and partner association representatives. The workgroup's primary activity is centered on addressing conflict minerals issues.

In 2009, the EICC and GeSI stated that mineral extraction and transport activities that fuel conflict are unacceptable. In order to enable companies to source conflict-free minerals, the workgroup has driven actions that are leading to development and mineral traceability efforts in the Great Lakes Region of Africa. Specifically, the workgroup developed the [Conflict Free Smelter \(CFS\) Program](#) to ensure reasonable conflict-free sourcing, and the Conflict Minerals Reporting Template to gather smelter/refiner information in the downstream supply chain. Through the EICC and GeSI the workgroup also supports in-region sourcing schemes to enable future legitimate trade from DRC and surrounding countries and engages with stakeholders for collaboration and efficiency.

In 2012, the workgroup goals include:

1. Institutionalize the Conflict-Free Smelter (CFS) Program

- a. Continue the CFS program rollout to producers of all four conflict metals (tantalum, tin, tungsten, and gold)
- b. Continue to enhance and improve the CFS website and overall process
2. Develop a common industry approach to support the disclosure and due diligence expectations of the U.S. SEC1, OECD2 and UN3; consider other models as they are developed
  - a. Participate in the OECD Due Diligence Guidance Pilot project
  - b. Continue improvement, proliferation, and standardization of the Conflict Minerals Reporting Template tool
3. Support the implementation of a verifiable traceability scheme for the Democratic Republic of Congo (DRC) and neighboring countries for conflict-free minerals
  - a. Support programs related to the Public Private Alliance for Responsible Minerals Trade, such as iTSCi, ICGLR Certification, BGR Certified Trading Chains, Solutions for Hope, etc.
  - b. Engage stakeholders regarding the sourcing efforts in the DRC and neighboring countries (e.g. nongovernmental organizations, governments, and other industry sectors)
  - c. Drive convergence and harmonization of in-region traceability schemes
4. Begin development and implementation of a self-sustaining, multi-industry Conflict-free Mineral Supply Chain program
5. Build and maintain strong relationships and increase transparency and efficiency to enhance credibility in the Extractives Work Group activities
  - a. Communicate with stakeholders on our positions and initiatives related to metals derived from conflict minerals
  - b. Encourage multi-industry and multi-stakeholder support for responsible sourcing in the DRC and neighboring countries for conflict-free minerals
  - c. Continue to communicate to interested government entities on the progress of our initiatives

### ***Who are Partner Industry Associations and Companies of EICC and GeSI in the Extractives Workgroup?***

The latest Program Supporters list can be found on the Conflict Free Smelter Website ([www.conflictreesmelter.org](http://www.conflictreesmelter.org)), look for the link in the upper right corner of the page.



*Click here for CFS Program Supporters*

## ***How long has the EICC and GeSI been focused on conflict minerals?***

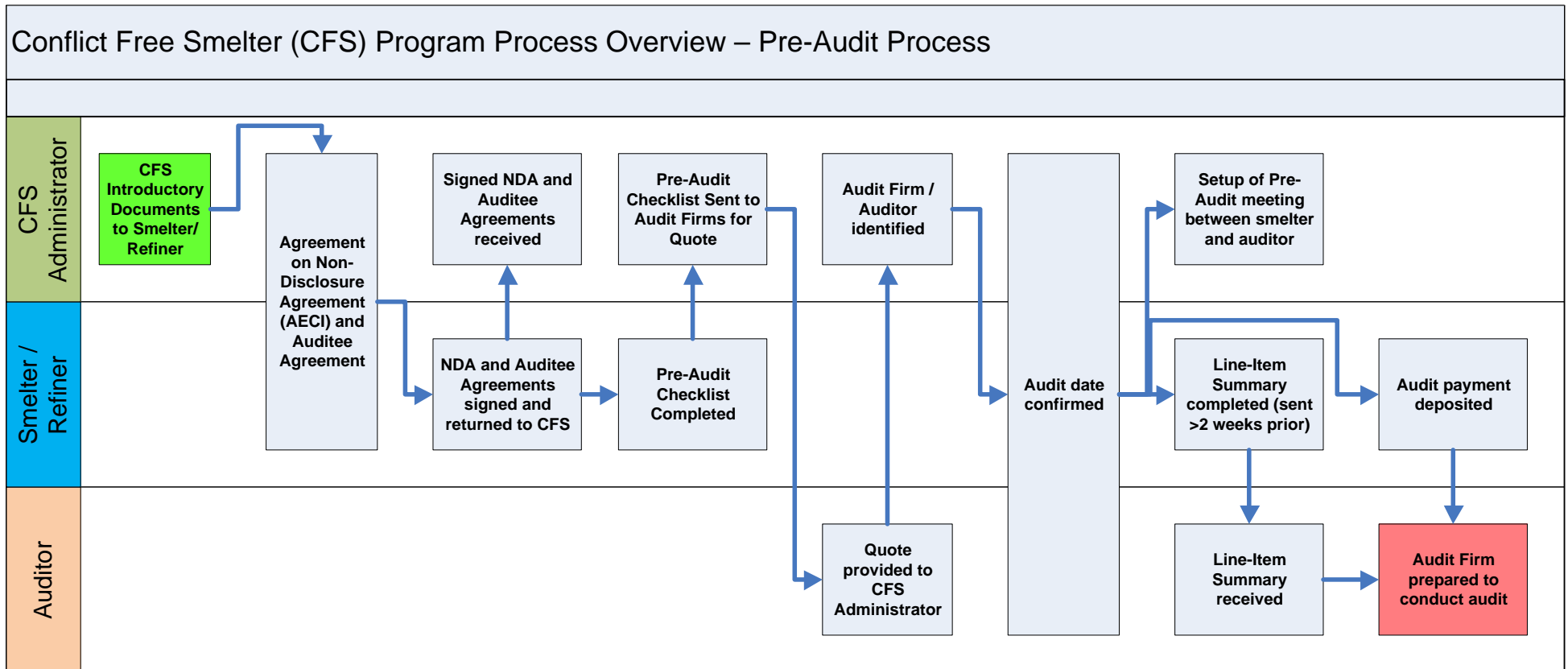
The EICC and GeSI has been focused on the issue of conflict minerals since 2007. See below timeline to get a sense of the work since then.

Timing	Activity
<b>2007</b>	Nongovernment organizations (NGOs) came to the EICC and GeSI to notify the organizations about the problem of the war in Eastern Democratic Republic of the Congo (DRC). They explained that the minerals of cassiterite (tin), columbite-tantalite (tantalum), wolframite (tungsten) and gold (3T's & G) were fueling the armed rebel groups and their deplorable practices against humanity. The NGOs started a public campaign describing how the electronics industry is a large users of these metals. Their efforts focus on getting purchasers of electronics to tell the product companies of their desire to ensure no conflict minerals are in the products they purchase.
<b>July 2007</b>	The EICC and GeSI form a task force to explore the issue of conflict minerals and the impact to the organizations.
<b>June 2008</b>	<p>This study, commissioned by the GeSI and the EICC, was designed to help the EICC and GeSI to understand how aluminum, cobalt, copper, gold, palladium and tin are mined, recycled, purchased and where they are used in electronics products. The report's author, GHGm, draws conclusions and recommendations on whether and how the members the EICC and GeSI can effectively influence social and environmental issues associated with production of metals used in electronic products.</p> <p>The report can be found at  <a href="http://www.eicc.info/documents/SERMetalsSupplyreport.pdf">http://www.eicc.info/documents/SERMetalsSupplyreport.pdf</a>.</p>
<b>July 2008</b>	The EICC and GeSI formalize the task force into a workgroup with an ongoing mandate to develop tools and resources to assist members in addressing conflict minerals in their supply chain.
<b>February 2009</b>	The EICC and GeSI release statements indicating that mineral extractions and transport activities that fuel conflict are unacceptable.
<b>September 2009</b>	The EICC and GeSI host the first tantalum supply chain workshop. More information can be found at <a href="http://www.eicc.info/documents/PRExtractivesSeptMeetingFINAL.pdf">http://www.eicc.info/documents/PRExtractivesSeptMeetingFINAL.pdf</a> .
<b>December 2009</b>	The EICC and GeSI host the second tantalum supply chain workshop. More information can be found at <a href="http://www.eicc.info/documents/PRExtractivesNovMeetingFinal.pdf">http://www.eicc.info/documents/PRExtractivesNovMeetingFinal.pdf</a> .
<b>April 2010</b>	The EICC and GeSI host the third tantalum supply chain workshop. More information can be found at <a href="http://www.eicc.info/documents/PRExtractivesApril72010.pdf">http://www.eicc.info/documents/PRExtractivesApril72010.pdf</a> .

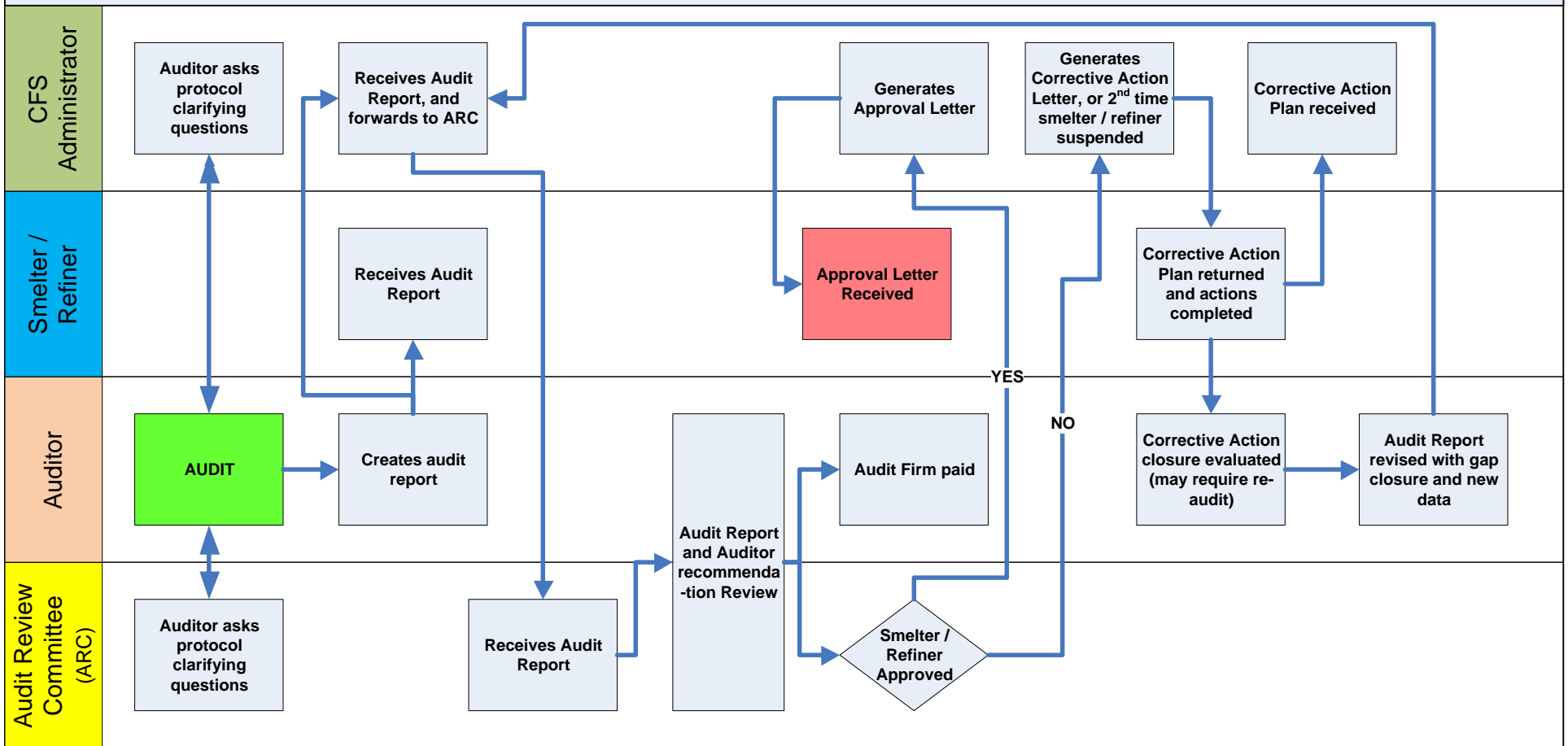
Timing	Activity
<b>April 2010</b>	<p>This report, commissioned by the EICC and GeSI and produced by RESOLVE, was designed to:</p> <ul style="list-style-type: none"> <li>• Assess the challenges and ability to create a transparency model by mapping the supply chain for tin (solder and solder paste), tantalum (capacitors and deposition targets), and cobalt (batteries and magnetic recording media) used in electronics</li> <li>• Assess suppliers' use of codes of conduct addressing social, environmental, health, and labor issues</li> <li>• Identify the challenges of collecting this data and consider ways to enhance and maintain transparency of the supply chain</li> </ul> <p>The EICC and GeSI used the recommendations documented in this report to support current and future work in materials extraction. The report can be found at <a href="http://www.eicc.info/documents/TracingaPathForward.pdf">http://www.eicc.info/documents/TracingaPathForward.pdf</a>.</p>
<b>May 2010</b>	<p>The EICC and GeSI host the first tin supply chain workshop. More information can be found at <a href="http://www.eicc.info/documents/PRExtractivesSnWorkshopFINAL.pdf">http://www.eicc.info/documents/PRExtractivesSnWorkshopFINAL.pdf</a>.</p>
<b>December 2010</b>	<p>The EICC and GeSI launch the Conflict-Free Smelter Program with the finalization of the CFS Program tantalum protocol. More information can be found at <a href="http://www.conflictreesmelter.org">www.conflictreesmelter.org</a> and <a href="http://www.eicc.info/documents/PRExtractivesSmelterAuditLaunch.pdf">http://www.eicc.info/documents/PRExtractivesSmelterAuditLaunch.pdf</a>.</p>
<b>December 2010</b>	<p>The EICC and GeSI host the fifth supply chain workshop, the first to cover more than one metal. More information can be found at <a href="http://www.eicc.info/documents/PRExtractivesSnWorkshopFINAL.pdf">http://www.eicc.info/documents/PRExtractivesSnWorkshopFINAL.pdf</a>.</p>
<b>April 2011</b>	<p>The EICC and GeSI tie the Conflict-Free Smelter Program more closely to the <i>OECD Due Diligence Guidance for Responsible Supply Chains from Conflict-Afflicted and High-Risk Areas</i>. More information can be found at <a href="http://www.eicc.info/documents/EICCPRCFSUpdate.pdf">http://www.eicc.info/documents/EICCPRCFSUpdate.pdf</a>.</p>
<b>June 2011</b>	<p>The EICC and GeSI publish the first list of smelters compliant to the CFS Program tantalum protocol. More information can be found at <a href="http://www.eicc.info/documents/PRExtractivesCFSTantalumListFINAL.2.pdf">http://www.eicc.info/documents/PRExtractivesCFSTantalumListFINAL.2.pdf</a>.</p>
<b>June 2011</b>	<p>The EICC and GeSI host the sixth supply chain workshop. More information can be found at <a href="http://www.eicc.info/documents/PRExtractivesExtractivesWorkshopVIFINAL.pdf">http://www.eicc.info/documents/PRExtractivesExtractivesWorkshopVIFINAL.pdf</a>.</p>
<b>August 2011</b>	<p>The EICC and GeSI launch the Conflict Minerals Reporting Template and Dashboard. More information can be found at <a href="http://www.conflictreesmelter.org">www.conflictreesmelter.org</a> and <a href="http://www.eicc.info/documents/PRExtractivesDueDiligencetoolFINAL.pdf">http://www.eicc.info/documents/PRExtractivesDueDiligencetoolFINAL.pdf</a>.</p>
<b>August 2011</b>	<p>The EICC and GeSI finalize the CFS Program tungsten and gold protocols. The protocols can be found at <a href="http://www.conflictreesmelter.org">www.conflictreesmelter.org</a>.</p>
<b>September 2011</b>	<p>The EICC and GeSI finalize the CFS Program tin protocol. The protocol can be found at <a href="http://www.conflictreesmelter.org">www.conflictreesmelter.org</a>.</p>

Timing	Activity
<b>September 2011</b>	The EICC and GeSI host the seventh supply chain workshop. More information can be found at <a href="http://www.eicc.info/documents/PRConflictMineralsSupplyChainWorkshopVIIFINAL.pdf">http://www.eicc.info/documents/PRConflictMineralsSupplyChainWorkshopVIIFINAL.pdf</a> .
<b>October 2011</b>	JEITA in collaboration with EICC and GeSI hosts the eighth supply chain workshop event, and the first in Asia (Tokyo).
<b>November 2011</b>	The EICC and GeSI each join the US State Department's Public-Private Alliance for Responsible Minerals Trade. More information can be found at <a href="http://www.eicc.info/documents/PRPPAannouncementFINAL_000.pdf">http://www.eicc.info/documents/PRPPAannouncementFINAL_000.pdf</a> .
<b>January 2012</b>	The EICC and GeSI welcome the first non-member, academic participant to the CFS Program Audit Review Committee. More information can be found at <a href="http://www.eicc.info/documents/PRSYoungJoinsARCFINAL_003.pdf">http://www.eicc.info/documents/PRSYoungJoinsARCFINAL_003.pdf</a> .

## Appendix B: Audit Process Flow Details



## Conflict Free Smelter (CFS) Program Process Overview – Audit and Post Audit





## Appendix C: Example Smelter and Refiner lists

The specific smelters/refiners listed below (including all sites of these smelters/refiners which may not all be listed, that are receiving any tantalum/tin/tungsten/gold-bearing materials as defined previously above) are types of companies expected to be audited as identified by EICC and GeSI, or its partner companies or partner industry sectors.

### Tantalum

This list does not include every tantalum smelter in the world.

Smelter Name	Country	Smelter Name	Country
Duoloshan	China	Ningxia	China
Exotech	USA	Niotan	USA
F&X	China	Plansee	Austria
Gannon & Scott	USA	Solikamsk	Russia
Global Advanced Metals (formerly Cabot)	USA	Tantalite Resources	South Africa
HC Starck	Germany	Ulba	Kazakhstan
Jiujiang Tambre	China	Zhuzhou	China
Mitsui	Japan		

### Tungsten

This list does not include every tungsten smelter in the world.

Smelter Name	Country	Smelter Name	Country
ATI Metalworking Products	USA	Jiangxi Rare Earth & Rare Metals Tungsten Group Corp	China
Chaozhou Xianglu Tungsten Industry Co Ltd	China	Jiangxi Tungsten Industry Co Ltd	China
China Minmetals Corp.	China	Sichuan Metals & Materials Imp & Exp Co	China
Ganzhou Huaxing Tungsten	China	Wolfram Bergbau und Hütten AG	Austria
Ganzhou Nonferrous Metals Smelting Co Ltd.	China	Wolfram Company CJSC	Russia
Global Tungsten & Powders Corp	USA	Xiamen Tungsten Co Ltd	China
HC Starck GmbH	Germany	Chongyi Zhangyuan Tungsten Co Ltd	China

## Tin

This list does not include every tin smelter in the world.

Smelter Name	Country	Smelter Name	Country
Cookson	USA	PT Babel Surya Alam Lestari	Indonesia
CV DS Jaya Abadi	Indonesia	PT Bangka Kudai Tin	Indonesia
CV Duta Putra Bangka	Indonesia	PT Bangka Putra Karya	Indonesia
CV JusTindo	Indonesia	PT Bangka Timah Utama Sejahtera	Indonesia
CV Makmur Jaya	Indonesia	PT Belitung Industri Sejahtera	Indonesia
CV Nurjanah	Indonesia	PT BilliTin Makmur Lestari	Indonesia
CV Prima Timah Utama	Indonesia	PT Bukit Timah	Indonesia
CV Serumpun Sebalai	Indonesia	PT Eunindo Usaha Mandiri	Indonesia
CV United Smelting	Indonesia	PT Fang Di MulTindo	Indonesia
EM Vinto	Bolivia	PT HP Metals Indonesia	Indonesia
Gejiu Zi-Li	China	PT Koba Tin	Indonesia
Gold Bell Group	China	PT Mitra Stania Prima	Indonesia
Jiangxi Nanshan	China	PT Refined Banka Tin	Indonesia
Liuzhou China Tin	China	PT Sariwiguna Binasentosa	Indonesia
Malaysia Smelting Corp	Malaysia	PT Stanindo Inti Perkasa	Indonesia
Metallo Chimique	Belgium	PT Sumber Jaya Indah	Indonesia
Minsur / Mineração Taboca S.A.	Peru / Brazil	PT Timah (includes Tambang)	Indonesia
Mitsubishi Material	Japan	PT Timah Nusantara	Indonesia
Novosibirsk	Russia	PT Tinindo Inter Nusa	Indonesia
OMSA	Bolivia	PT Yinchendo Mining Industry	Indonesia
PT Alam Lestari Kencana	Indonesia	Thailand Smelting and Refining Co., Ltd.[Thaisarco]	Thailand
PT Artha Cipta Langgeng	Indonesia	Yunnan Tin	China
PT Babel Inti Perkasa	Indonesia	Yunnan Chengfeng	China

## Gold

This list does not include every gold refinery in the world.

Refinery Name	Country	Refinery Name	Country
Allgemeine Gold- & Silberscheideanstalt	Germany	Metalor	Switzerland, Hong Kong, USA
Almalyk Mining and Metallurgical Complex (AMMC)	Uzbekistan	Met-Mex Penoles, S.A.	Mexico
AngloGold Ashanti Minercao Ltd	Brazil	Mistubishi Materials Corporation	Japan
Argor Heraeus	Switzerland	Mitsui	Japan
Asahi Pretec	Japan	Moscow Special Alloys Processing Plant	Russia
Atasay Kuyumculuk Sanayi Ve Ticaret A..S.	Turkey	Navoi	Uzbekistan
Aurubis	Germany	Ohio Precious Metals	USA
Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	Philippines	OJSC	Russia
Boliden Mineral AB	Sweden	PAMP SA	Switzerland
Caridad	Mexico	Perth Mint (Western Australia Mint)	Australia
Cendres & Metaux SA	Switzerland	Prioksky Plant of Non-Ferrous Metals	Russia
Central Bank of the DPR of Korea	Korea	PT Aneka Tambang (Persero)	Indonesia
Chimet SpA	Italy	Rand Refinery Limited	South Africa
Codelco	Chile	Royal Canadian Mint	Canada
Dowa	Japan	Schone Edelmetaal	Netherlands
FSE Novosibirsk Refinery	Russia	SEMPSA Joyeria Plateria SA	Spain
Heraeus	Germany, Hong Kong	Shandong Gold Mining (Laizhou)	China
Inner Mongolia Qiankun Gold and Silver Refnery Share Company Limited	China	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	China
Ishifuku Metal Industry Co . Ltd	Japan	SOE Shyolkovsky Factory of Secondary Precious Metals	Russia
Japan Mint	Japan	Solar Applied Materials Technology Corp.	Taiwan
Jiangxi Copper Company Limited	China	Sumitomo	Japan
Johnson Mathey Inc	Canada, USA	Tanaka	Japan
JSC Ekaterinburg Non-Ferrous Metal Processing Plant	Russia	The Great Wall Gold and Silver Refinery of China	China
JSC Uraelectromed	Russia	Tokuriki Honten Co., Ltd	Japan
JX Nippon Mining & Metals	Japan	Toyo Smelter & Refinery	Japan
Kazzinc Ltd	Kazakhstan	Umicore Brazil Ltd.	Brazil
Kyrgyzaltyn JSC	Kyrgyz Republic	Umicore SA	Belgium
L'azurde Company For Jewelry	Saudi Arabia	VALCAMBI	Switzerland
LS Nikko	Korea	Xstrata	Canada
Materion	USA	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	China
Matsuda Sangyo	Japan	Zijin Mining Group Co. Ltd	China