

Conflict Mineral Reporting Supplier Requirements

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In order to facilitate the due diligence and reporting process, suppliers should take the following measures:

Enroll your company in the iPoint Conflict Minerals Platform (iPCMP), which is used by numerous Tier 1 automotive manufacturers and suppliers. The iPCMP is an interactive software application that allows for the collection, management and reporting of conflict minerals data. The software also enables the tracking of country-of-origin inquiries on conflict minerals;

- Upload into the appropriate iPCMP website panel the required supplier and smelter data for any of the conflict minerals or derivatives, including any compounds in which such derivatives are used, for any products supplied to ABC Group after Jan. 1, 2013. You must ensure to input on this site smelter data for any of the potential conflict minerals and derivatives. If your company has contracted to supply ABC Group, its subsidiaries, affiliates, joint-ventures or related companies with products, your report through iPCMP is due by May 30th of every year.
- It is imperative that your company implement the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guide) and distribute same to your suppliers. The SEC has specifically endorsed the OECD Guide and it is a useful due diligence tool for companies that are required to file Conflict Minerals reports. The OECD Guide can be accessed at: http://www.oecd.org/daf/inv/mne/mining.htm;
- Your suppliers must also implement and distribute the OECD Guide to their suppliers.
 An additional requirement of the new U.S. legislation calls for full endorsement of the Conflict Free Smelter program throughout the reporting company's entire supply chain.