AIAG Conflict Minerals Reporting Checklist

This checklist is designed to be modified for your individual company; currently this checklist is designed for SEC filers. Rows, columns can be modified accordingly.

Major Headings are aligned with OECD (Organisation for Economic Cooperation and Development) Due Diligence Guidance
This document is intended for the convenience of AIAG members and constituents and does not constitute legal, tax or accounting advice.

Number	OECD Annex I Reference	Filer Requirement? (Y)	Task Name	Start Date	Due Date	Next Review Date	Responsible	Support	Completed	Status	Comments
1.00	1	Y	Establish Strong Company Management Systems								
1.01	1B)	Y	Determine managerial owner for conflict minerals								
1.02			Assess adequate staffing for supply chain compliance/conflict minerals reporting activities								
1.03			Participate in industry association groups (e.g. AIAG, CFSI)								
1.04	1D)	Y	Create process for supplier questions (E-Mail address)								
1.05			Determine and document a scope of which products & components are relevant								
1.06			Consider obtaining conflict minerals reporting format (e.g. the CMRT or software solutions based on the CMRT like iPoint's Conflict Minerals Platform (iPCMP), or other software solution as designated by your customer.								
1.07	1D)	Y	Develop supplier communication plan								
1.08	1A)	Y	Develop conflict minerals reporting policy								
1.09	1A)	Y	Place policy on company website								
1.10			Cascade supplier training on reporting process								
1.11			Design, document and implement a strategy to respond to identified risk								
1.12			Develop internal communication plan								
1.13			Add conflict minerals language to terms and conditions or equivalent								
1.14	1C)	Y	Establish and document internal processes and standards/norms								
1.15			Determine reporting scope for suppliers								
2.00	2		Identify and Assess Risk in the Supply Chain								
2.01			Establish and annually review supplier identification process								
2.02			Identify relevant suppliers based on criteria established								
2.03		Y	Conduct RCOI to determine whether the conflict minerals originated in the DRC or Covered Countries								
2.04		Y	Analyze the reported data for consistency/accuracy per guidance in the AIAG CMRT Assessment Process found in the CM-3								
2.05			Conduct due diligence on the conflict minerals source using the OECD 3TG Supplements and all publically available SOR information through the CFSI and other sources								
2.06			Respond to information requests from customers								
3.00	3		Design and implement a strategy to respond to identified risk								
3.01	3A)	Y	Report identified risks to the designated senior management								

AIAG Conflict Minerals Reporting Checklist

This checklist is designed to be modified for your individual company; currently this checklist is designed for SEC filers. Rows, columns can be modified accordingly.

Major Headings are aligned with OECD (Organisation for Economic Cooperation and Development) Due Diligence Guidance
This document is intended for the convenience of AIAG members and constituents and does not constitute legal, tax or accounting advice.

Number	OECD Annex I Reference	Filer Requirement? (Y)	Task Name	Start Date	Due Date	Next Review Date	Responsible	Support	Completed	Status	Comments
3.02	3B)	Y	Develop a supplier escalation procedure to address non-compliant suppliers								
3.03	3B)	Y	Create and implement a risk mitigation plan to address identified risks in the supply chain.								
3.04	3C)	Y	Monitor and track performance of the company's risk-mitigation efforts								
4.00	4		Third Party Audit of Smelters/Refiners Due Diligence Practices								
4.01			Review smelter list against the CFSI conflict free smelter list								www.conflictfreesmelter.org
4.02			Contact any smelters not on the CFSI list to undergo a CFSI audit								
5.00	5		Report Annually on Supply Chain Due Diligence								
5.01	5	Y	File a Conflict Minerals Report as an exhibit to Form SD describing the due diligence measures taken and post report to company website.								
5.02		Y	Disclose description of RCOI and results in new Form SD								
5.03		Y	Meet reporting requirements per the final rules		May 31st of every calendar year						
5.04		Y	Carry out independent 3rd party audit of supply chain when applicable								
5.05			Report to all applicable customers								