

EU CONFLICT MINERALS REGULATION

HOW RESPONSIBLE SOURCING WORKS

Breaking the links between the minerals trade, conflict financing and human rights abuses



global witness

UPSTREAM COMPANIES

SUCH AS SMELTERS AND REFINERS

DOWNSTREAM COMPANIES

SUCH AS THOSE MANUFACTURING PRODUCTS

Smelters and refiners work their suppliers to trace supply chains back to their origin, and look for risks along the way, including at mine sites, along transport routes, and in trading centres

Companies contact their suppliers and work together to trace their supply chains back to smelters/refiners



1 GOOD MANAGEMENT SYSTEMS

PUT IN PLACE GOOD SYSTEMS, INCLUDING:

- A supply chain policy that sets out your commitments to avoiding conflict financing or abuses. A model policy is available in the OECD Guidance
- Incorporate this policy into your supplier contracts
- Put in place a chain of custody or supply chain traceability system, and a mechanism for voicing concerns
- All this can be done with help from an **industry scheme**

1 GOOD MANAGEMENT SYSTEMS

PUT IN PLACE GOOD SYSTEMS, INCLUDING:

- A supply chain policy that sets out your commitments to avoiding conflict financing or abuses. A model policy is available in the OECD Guidance
- Incorporate this policy into your supplier contracts and put in place a mechanism for voicing concerns
- All this can be done as part of an **industry scheme**

2 RISKS IN YOUR SUPPLY CHAIN

- What are the risks in your supply chain?
- How are you dealing with them?
- Review information gathered against your policy, and implement a strategy to respond to risks you find

3 INDEPENDENT AUDITS

Smelters and refiners should carry out and publish **independent audits** on their due diligence

2 RISKS IN YOUR SUPPLY CHAIN

- Take reasonable steps to identify **smelters/refiners** in your supply chain and assess their due diligence
- Review information, such as audits, against your policy and implement a strategy to respond to the risks you find

3 INDEPENDENT AUDITS

- Use reasonable efforts to make sure your **smelters/refiners** carry out independent audits on their due diligence
- This can be done with help from industry schemes

4 PUBLICLY REPORT

- By 31 March each year, submit documentation to competent authority, including policy and independent audit
- Make information on due diligence available to customers, and publicly report as widely as possible on actions you have taken under Steps 1, 2 and 3

4 PUBLICLY REPORT

Publicly report, as widely as possible, on the actions you have taken under Steps 1, 2 and 3