

# Help for Suppliers Responding to ITW's Conflict Minerals Request

## Background Information

### War in the Democratic Republic of the Congo (DRC)

At many sites in the Democratic Republic of the Congo ("DRC") and the nine adjoining countries sharing an internationally recognized border with the DRC, including Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia (also known as the "Covered Countries"), armed groups illegally tax, extort, and coerce civilians to work. Miners, including children, work up to 48-hour shifts amidst deadly mudslides and tunnel collapses. Rebel groups use rape and violence to control the local population and use proceeds from mining operations to continue financing regional conflict.

### The US Government response to the humanitarian situation in the DRC

On July 21, 2010, the Dodd-Frank Wall Street Reform and Consumer Protection Act was signed into law, its primary focus being financial regulatory reform. **§1502 of the Act** specifically required the U.S. Securities and Exchange Commission ("SEC") to adopt rules requiring public companies with tin, tantalum, tungsten and/or gold, also known together as "3TG" in their products to conduct an inquiry (a "reasonable country of origin inquiry", or RCOI) to determine the country of origin of their 3TG. As a result, on August 22, 2012, the SEC adopted the rule mandated by the Dodd-Frank Act, which requires public companies to:

- File a report once a year with the SEC describing their RCOI process; and
- If the origin of any 3TG is the DRC or an adjoining country ("Covered Countries"), file a more detailed Conflict Minerals Report and have their process audited.

As a public filer, ITW and its businesses, including those outside of the U.S., must comply with the 3TG disclosure rules adopted by the SEC. **If you are a supplier of product that may contain tin, tantalum, tungsten and/or gold to one of ITW's businesses, you are a part of ITW's supply chain and therefore are subject to report on the 3TG that may be found within the ITW business' end product.** ITW's Conflict Minerals Policy Statement, Supplier Code of Conduct and Supplier Terms and Conditions each provide further guidance with respect to our expectations for our suppliers.





## How to satisfy our request.

**First, determine whether there is tin, tantalum, tungsten and/or gold in the product you sell to us.**

If you *don't know* whether or not your product contains 3TG, read #1-3 below carefully to help you determine whether or not your product contains tin, tantalum, tungsten or gold:

1. **Review the SEC Rule.**  
If 3TG is necessary to the functionality or production of a product manufactured (or contracted to be manufactured) by the Company, the Company must comply with the conflict minerals rule designed to determine whether the 3TG originated in the Covered Countries. **Tin, tantalum, tungsten and gold** are the only minerals covered by the rule at this time.
2. **Seek guidance from those at your company who know your product to determine whether *any* 3TG is contained in your product – is any tin, tantalum, tungsten and/or gold contained in products that you supply to an ITW business?**  
Ask people in your organization who have relevant knowledge (for example: engineering, manufacturing, environmental, chemical product safety, purchasing, quality control, etc.) whether any of your products contain tin, tantalum, tungsten or gold. The following information may help with their determination:

### What "Typical" Products Contain 3TG?

Derivative Metals	Cassiterite	Columbite-Tantalite	Wolframite	Gold
<b>Minerals</b>	<p>Tin Often used to coat other metals for corrosion prevention and to create alloys</p> 	<p>Tantalum Stores electricity and is used in alloys for its strength</p> 	<p>Tungsten Commonly used in tools, cell phones, and high-temperature situations, also used in alloys for its strength</p> 	<p>Gold Malleable, not highly corrosive, and highly conductive to electricity and heat</p> 
<b>Examples of products or applications</b>	<ul style="list-style-type: none"> <li>Alloys (Bronze, brass, pewter)</li> <li>Anodes (electric flows)</li> <li>Automotive/car parts (including but not limited to): fuel tank, sealants, wiring, radiator, seat cushions, engine parts, gears, pumps, joints, windshields, etc.</li> <li>Batteries</li> <li>Biocides: fungicide, bactericide, insecticide (AW 75-D, Bio-Met TBTO, Biomet, Biomet 75, BTO, Butinox, C-SN-9, Hexabutylidistannoxane, Hexabutyliditin, etc)</li> <li>Brass</li> <li>Bronze (tin + copper)</li> <li>Capacitors</li> <li>Containers (tin coats other metals for protection)</li> <li>Corrosion resistant coatings</li> <li>Dielectrics (electrical insulator)</li> <li>Electrical Conductors</li> <li>Electronics (including but not limited to): portable electronics &amp; high speed processing devices (mobile/cell phones, computers, digital cameras, video game consoles), calculators, GPS devices, televisions, etc.</li> <li>Flame retardants or anti-microbial treatments applied to various materials</li> <li>Food/drink product packaging</li> <li>Gas tanks/radiator heater tanks</li> <li>Glass (as an additive for durability)</li> <li>Glass coatings (to prevent fissures)</li> </ul>	<ul style="list-style-type: none"> <li>Alloys</li> <li>Automotive/car parts (including but not limited to): audio equipment, climate control, sensors, wiper system, seatbelts, fuel pump</li> <li>Camera lenses</li> <li>Capacitors &amp; high power resistors</li> <li>Communication systems</li> <li>Contacts and connectors found in electronics</li> <li>Electronics (including but not limited to): portable electronics &amp; high speed processing devices (mobile/cell phones, computers, digital cameras, video game consoles), calculators, GPS devices, televisions, etc.</li> <li>High-speed machine tools</li> <li>Laboratory Equipment</li> <li>LED lights</li> <li>Plating</li> <li>Printed Circuit Board Assemblies (PCBAs)</li> <li>Wire (IC wire bonding)</li> </ul>	<ul style="list-style-type: none"> <li>Automotive/car parts: (including but not limited to): circuits, gear teeth, bearing components.</li> <li>Capacitors</li> <li>Carbide, carbide tools</li> <li>Coatings</li> <li>Compact fluorescents (CFLs) (in their emitter coils)</li> <li>Counterweights</li> <li>Drills</li> <li>Electrodes</li> <li>Electronics (including but not limited to): portable electronics &amp; high speed processing devices (mobile/cell phones, computers, digital cameras, video game consoles), calculators, GPS devices, televisions, etc.</li> <li>Filaments in older-style (not energy saving) electric bulbs</li> <li>Halogen tungsten lamps (energy saving)</li> <li>Hardware such as nails, screws, hooks, mounting equipment</li> <li>Heating elements</li> <li>Heating elements</li> <li>High refractive index glass</li> <li>High temperature alloys</li> <li>High temperature lubricants</li> </ul>	<ul style="list-style-type: none"> <li>Aerospace equipment</li> <li>Automotive/car parts (including but not limited to): on board electronics, fuel cells.</li> <li>Capacitors</li> <li>Coatings/bonding layers</li> <li>Communications equipment</li> <li>Connecting wires &amp; connection strips</li> <li>Connectors – including edge connectors (used with microprocessor and memory chips, motherboards) &amp; plug-and-socket connectors used to attach cables</li> <li>Contacts, switch and relay</li> <li>Control systems</li> <li>Electrodes</li> <li>Electronics (including but not limited to): portable electronics &amp; high speed processing devices (mobile/cell phones, computers, digital cameras, video game consoles), calculators, GPS devices, televisions, etc.</li> <li>High temperature allocations</li> <li>Joints (in solder)</li> <li>Metal wire</li> <li>Plating</li> </ul>

	<ul style="list-style-type: none"> <li>• Heating elements</li> <li>• High performance paint manufacture</li> <li>• Inks</li> <li>• Kitchen utensils, clips, pins, metal signs</li> <li>• Paint, oil, polish, cleaners, etc.</li> <li>• Pewter</li> <li>• Polyester</li> <li>• Preservatives for wood, textiles, paper and electrical equipment</li> <li>• PVC (as an intermediate)</li> <li>• PVC and plastics (as heat stabilizer) – in electric cables, vinyl, composite or “faux” wood, clear plastics</li> <li>• Resistors</li> <li>• Roofing, weather insulator</li> <li>• Solar panels</li> <li>• Solder (tin + lead) – used for joining pipes, for seams on products &amp; packaging and for Printed Circuit Board Assemblies (PCBAs);</li> <li>• solderable coatings</li> <li>• Stannic chloride (stabilizer in perfume)</li> <li>• Stannic oxide (catalyst/steel polishing powder)</li> <li>• Steel plating</li> <li>• Urethane coatings and polyurethane foam protection</li> <li>• Water purifier</li> <li>• Wire &amp; cable coating</li> </ul>		<p>(tungsten disulfide)</p> <ul style="list-style-type: none"> <li>• High-speed cutting tools</li> <li>• Joints</li> <li>• Lighting</li> <li>• Magnetrons for microwave ovens</li> <li>• Metal wires</li> <li>• Power resistors</li> <li>• Printed Circuit Board Assemblies (PCBAs)</li> <li>• Tools (often when alloyed with steel)</li> <li>• Weights</li> <li>• Welding tools</li> </ul>	<ul style="list-style-type: none"> <li>• Radiation shielding</li> </ul>
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**Other Necessary Considerations:**

- **Packaging.** If 3TG is contained in the packaging but not in the product, it is not subject to the rule. However, if the product you sell is the packaging itself, it is subject to the rule.
- **Embellishments and decorations not subject to the rule.** If 3TG is used in a tool or piece of equipment that is used in production, or as an embellishment or decoration to the product, the rules do not apply to them.
- **If not intended to be in product, not subject to the rule.** If 3TG is present only as a contaminant or naturally occurring by-product, the rule would not apply to it.
- **Prototypes and demonstration devices not subject to the rule.** However, once any of these are offered for sale they are subject to the rule.
- **Catalysts.** If 3TG is used as a catalyst or in a similar manner in another process that is necessary to produce the product but is not contained in the product, it is considered not “necessary to the production” of a product and as such, is not covered by the 3TG rules.
- **Recycled and scrap metals.** If all of your 3TG is from recycled or scrap sources, it is considered conflict free but must still be included in the reporting templates.

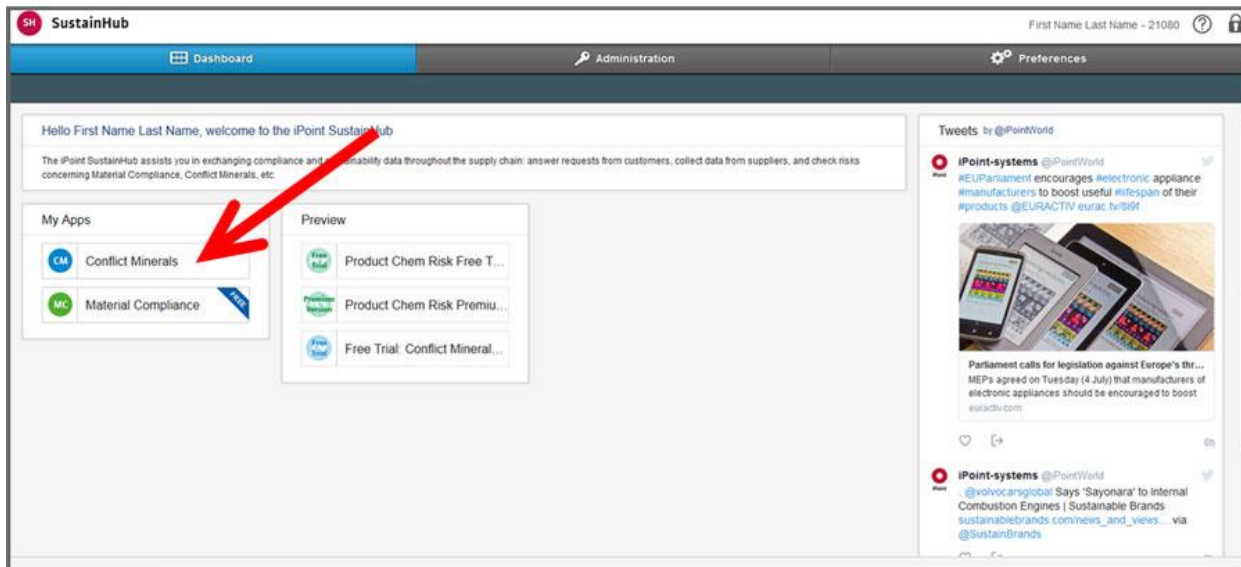
3. **IS any 3TG contained in products that your business contracts to manufacture and sells to an ITW business?**  
A business contracts to manufacture a product if the business has any influence regarding the manufacture of the product. Contracting to purchase a product for resale without incorporating it into your own product, and without influencing the manufacture of the ordered product, would not subject a business to the rule. A business does not “contract to manufacture” a product if it does no more than: (1) specifies or negotiates contractual terms that do not directly relate to the manufacturing of the product, (2) affixes its brand, mark, logo or label to a generic product manufactured by a third party, or (3) services, maintains, or repairs a product manufactured by a third party. **However, if a contract specifies that the manufacturer use tin, tantalum, tungsten and/or gold, that would be viewed as contracting to manufacture even if no influence is exerted on the overall manufacturing process.**

### My product does not contain 3TG.

If your answers to 2 and 3 above are both NO, we still need you to submit a Conflict Minerals Reporting Template (CMRT) that indicates your product does not contain 3TG. **ITW businesses prefer that you submit your CMRT using iPoint.**

To submit your CMRT via iPoint, please follow the steps below:

1. Register for a *free* Basic iPCMP account (if you already have an account, please go to #2) by clicking on the “iPoint Conflict Minerals Platform Registration” link in the letter you received from our business.
2. Respond to the letter our business sent to you by first logging into your account and selecting “Match Request to your Company”. Enter the email address of the person the invitation was sent to, then the invitation key found in the letter from our business.
3. [Click here for free video training that iPoint offers for its Basic License users.](#) These short videos cover the registration process, managing customer requests, creating reports, master data and preferences and matching requests.
4. Upon logging in you will be placed in SustainHub’s Main Page. From here click on “Conflict Minerals” under “My Apps”



5. When you are routed into your iPCMP account, click on the request from ITW, under “Requests from Customers” and click “Respond to Request”.

The screenshot shows the Conflict Minerals dashboard. At the top, there are navigation tabs: Dashboard, Requests from Customers, Requests to Suppliers, Reports and Statistics, Master Data, Preferences, and Match Request. A message at the top left says "Hello First Name Last Name" and "You have one request concerning your conflict minerals compliance that needs your attention." Below this is a donut chart with a green and blue segment. A table titled "Requests from Customers (3)" is visible, with a red arrow pointing to the "Respond to Request" button at the bottom of the table.

ID	Request Type	Year	Status	Last Updated
578128	Guided Tour	2016	Open	2017-03-31 23:59:59 EDT
551789	Guided Tour	2016	Data Accepted by Customer	2016-10-31 23:59:59 EDT
595196	Sub Org A	2016	Data Accepted by Customer	2017-04-30 23:59:59 EDT

6. Select a method for responding to ITW by clicking “Create Report Manually” and click “Next”

The screenshot shows a dialog box titled "Respond to Request (From: Guided Tour - Due: 2017-07-28)". Under "Select an Option", the "Create Report Manually" radio button is selected. At the bottom right, the "Next" button is highlighted with a red arrow.

7. Confirm the Declaration Scope requested by ITW, (which will be Company Level in most cases) by clicking “Next”.

The screenshot shows the same dialog box, now with the "Declaration scope requested by customer" section. The "Requested Declaration Scope" dropdown is set to "Company". The "Description Scope" field is empty. At the bottom right, the "Next" button is highlighted with a red arrow.

8. Next select the Declaration Scope that your company is reporting and click "Next".

Respond to Request (From: Guided Tour - Due: 2017-07-28)

**Declaration scope**

Declaration Scope \* Company

Description Scope

Use scope requested by customer

Cancel Previous Next Finish

9. Next you will verify/complete your Organization and contact information and click "Next".

Respond to Request (From: Guided Tour - Due: 2017-07-28)

**Organization**

Contact

Contact Name \* First Name Last Name

Title

Email \* admin@pointdemobasic.com

Phone \* 1234567890

Authorizer

Contact Name \* name

Title

Email \* email@email

Phone \* 1234567890

Effective Date

Effective Date \* 7/13/17

Cancel Previous Next Finish

10. Select your answers to Question 1 (No), and click "Next". Since you have determined that the products you supply to ITW contain no 3TG, answer "No" for all parts of Question 1, click "Next".

Respond to Request (From: Guided Tour - Due: 2017-07-28)

**Answer the following questions**

1) Is any 3TG intentionally added or used in the product(s) or in the production process?

Tantalum	No	Comments...
Tin	No	Comments...
Gold	No	Comments...
Tungsten	No	Comments...

2) Does any 3TG remain in the product(s)?

Tantalum		Comments...
Tin		Comments...
Gold		Comments...
Tungsten		Comments...

Cancel Previous Next Finish

11. On Questions 3 and 4 click "Next" (since you answered "No" to Question 1, you do not need to answer these questions).

Respond to Request (From: Guided Tour - Due: 2017-07-28)

Answer the following questions


3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC term, see definitions tab)

Tantalum	<input type="text"/>	Comments...
Tin	<input type="text"/>	Comments...
Gold	<input type="text"/>	Comments...
Tungsten	<input type="text"/>	Comments...

4) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources?

Tantalum	<input type="text"/>	Comments...
Tin	<input type="text"/>	Comments...
Gold	<input type="text"/>	Comments...
Tungsten	<input type="text"/>	Comments...

Cancel Previous Next Finish



12. On Questions 5 and 6 click "Next" (since you answered "No" to Question 1, you do not need to answer these questions).

Respond to Request (From: Guided Tour - Due: 2017-07-28)

Answer the following questions


5) What percentage of relevant suppliers have provided a response to your supply chain survey?

Tantalum	<input type="text"/>	Comments...
Tin	<input type="text"/>	Comments...
Gold	<input type="text"/>	Comments...
Tungsten	<input type="text"/>	Comments...

6) Have you identified all of the smelters supplying the 3TG to your supply chain?

Tantalum	<input type="text"/>	Comments...
Tin	<input type="text"/>	Comments...
Gold	<input type="text"/>	Comments...
Tungsten	<input type="text"/>	Comments...

Cancel Previous Next Finish



13. On Question 7 click "Next" (since you answered "No" to Question 1, you do not need to answer these questions).


Respond to Request (From: Guided Tour - Due: 2017-07-28)

Answer the following questions

7) Has all applicable smelter information received by your company been reported in this declaration?

Tantalum	<input type="text"/>	Comments...
Tin	<input type="text"/>	Comments...
Gold	<input type="text"/>	Comments...
Tungsten	<input type="text"/>	Comments...

Cancel Previous Next Finish





14. For Questions A through E, since you answered “No” to Question 1, you do not need to answer these questions – click “Next”.

**Respond to Request (From: Guided Tour - Due: 2017-07-28)**

**Answer the following questions**

Answer the Following Questions at a Company Level

A. Have you established a conflict minerals sourcing policy?

Yes  
 No

Comments...

B. Is your conflict minerals sourcing policy publicly available on your website? (Note – If yes, the user shall specify the URL in the comment field.)

Yes  
 No

Comments...

C. Do you require your direct suppliers to be DRC conflict-free?

Yes  
 No

Comments...

D. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program?

Yes  
 No

Comments...

Cancel Previous Next Finish

15. For Questions F through I, since you answered “No” to Question 1, you do not need to answer these questions – click “Next”.

**Respond to Request (From: Guided Tour - Due: 2017-07-28)**

**Answer the following questions**

Answer the Following Questions at a Company Level

F. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)?

Yes, in conformance with IPC1755 (e.g., CMRT)  
 Yes, using other format (describe)  
 No

Comments...

G. Do you review due diligence information received from your suppliers against your company's expectations?

Yes  
 No

Comments...

H. Does your review process include corrective action management?

Yes  
 No

Comments...

I. Is your company required to file an annual conflict minerals disclosure with the SEC?

Yes  
 No

Comments...

Cancel Previous Next Finish

16. On the “All Smelters included in this roll up” page since you have indicated there is no 3TG in your products, there is no need to provide smelter data – click “Next”.

**Respond to Request (From: Guided Tour - Due: 2017-07-28)**

**All Smelters Included in this Roll-up**

Hide Search Panel

Company Name [ ] Smelter State [ ] Metals [ ]

Data Declaration [ ]

Search Reset Search

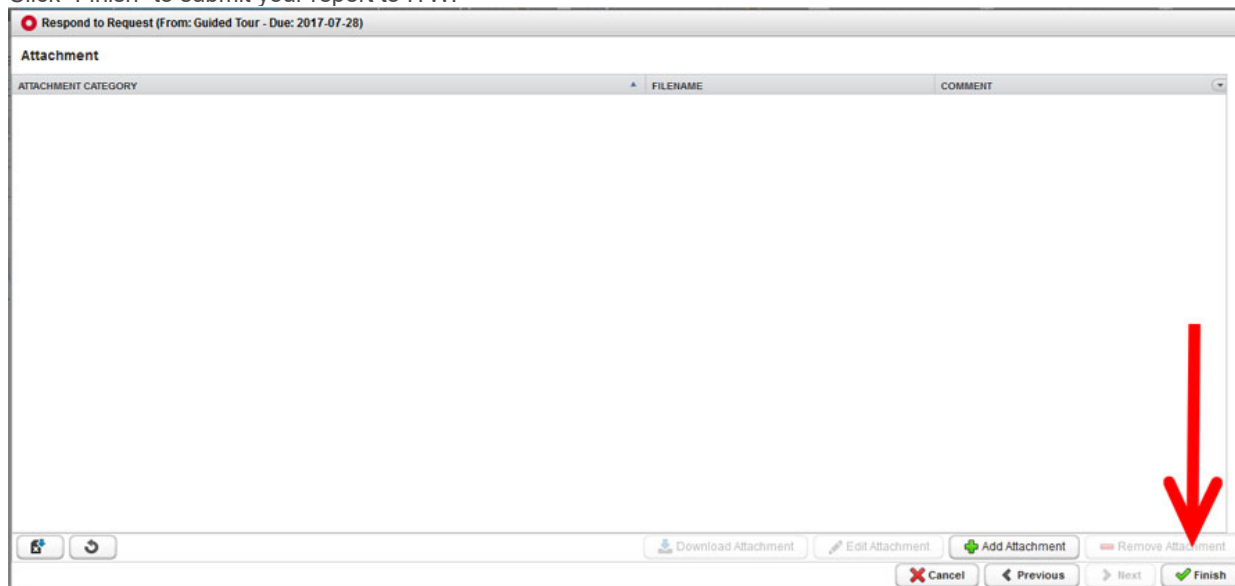
METAL	NAME	STATE	COUNTRY	SMELTER ID	SMELTER STATE	STREET
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Consolidate Smelter List Undo Consolidation Add Smelter Edit Smelter Remove Smelter

Cancel Previous Next Finish



17. Click “Finish” to submit your report to ITW.



Please [click here for iPCMP related questions](#) and go to the Service Desk section at the bottom of the page. For general questions either contact your ITW business contact (the person who sent you the letter) or email [conflictminerals@itw.com](mailto:conflictminerals@itw.com).

### My product contains 3TG.

If your answer to 2 or 3 above (under “How to Satisfy our Request”) is YES and any tin, tantalum, tungsten and/or gold is contained in the product you sell to us, we need you to begin your due diligence by performing a Reasonable Country of Origin Inquiry (RCOI) using iPoint. This means we need you to send inquiries to your suppliers requesting they fill out a CMRT for you. You should send inquiries to all suppliers you believe sell you product that contains tin, tantalum, tungsten or gold. IF YOU ARE UNSURE whether or not a supplier’s product contains 3TG, include the supplier in your inquiries to ensure your response is as complete as possible.

You can choose the method that best suits your business for collecting declarations from your supply base, but **ITW prefers to receive data in the form of a Conflict Minerals Reporting Template (CMRT) generated in iPCMP for our purposes.** iPoint has [license offerings](#) you may choose to leverage in collecting your supplier information:

- Basic – Free, primarily for sending responses to your customers.
- Premium – For sending requests to your suppliers **and** responding to your customers.
- Premium Plus – For users sending and receiving requests from multiple locations.
- Enterprise – Contains all features of Basic, Premium and Premium Plus with additional functionality.

For iPCMP Basic account users, click below for short videos to help you with each of the following topics:

- [Registration](#)
- [Managing Customer Requests](#)
- [Creating Reports](#)
- [Master Data and Preferences](#) and
- [Matching a Request](#)

COMING SOON For iPCMP Premium/Premium Plus account users – click here for short videos to help you with:

- Managing Private Supplier Data
- Sending Supplier Requests
- Uploading Manually Submitted CMRT’s
- Creating and Saving Reports to the Platform
- Reports & Statistics
- Answering Requests Using Saved Reports
- Managing Preferences

Please [click here for iPCMP related questions](#) and go to the Service Desk section at the bottom of the page. For general questions either contact your ITW business contact (the person who sent you the letter) or email [conflictminerals@itw.com](mailto:conflictminerals@itw.com). If you do not use iPoint, please email your completed CMRT to the person at the ITW business who requested it from you.

## Other links you may find helpful.

Responsible Minerals Initiative (MRI), formerly the Conflict Free Sourcing Initiative (CFSI):

- [www.conflictreesourcing.org](http://www.conflictreesourcing.org)
- [CMRT Template version 5.11](#)
- [Guides to filling out the CMRT](#) (available in English, Chinese, German and Japanese)
- [Engaging Distributors for Conflict Minerals Information](#)

Automotive Industry Action Group (AIAG):

- [Corporate Responsibility/Conflict Minerals webpage](#)
- [Informational Modules \(training videos\) for Automotive Suppliers](#) (if you do not have a log-in you will be prompted to create one)

OECD International Framework:

- [Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#) (available in multiple languages)

The Enough Project:

- [www.enoughproject.org](http://www.enoughproject.org) (for more information about Central African conflict)