

Multi-stakeholder Group Statement on the Challenge to Conflict Minerals Rule

We are a multi-stakeholder group (“MSG”) representing diverse organizations including issuers from several industrial sectors; sustainable, responsible and faith-based investors; and non-governmental organizations.

Since 2009 – predating the passage of the conflict minerals legislation (Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act) - the MSG has been working together to develop an agenda for action to address the conflict in the Democratic Republic of Congo (“DRC”) by cutting off funding from trade in conflict minerals. After the law was passed, the MSG began to develop consensus policy positions on the Securities and Exchange Commission (“SEC”) rulemaking to implement the provision. In the course of this rulemaking, we came together to file four separate comment letters¹, meet with SEC Commissioners and staff², and several MSG participants sat on panels at the SEC’s Roundtable on Conflict Minerals in October 2011³. Our extensive efforts in this rulemaking were evidence of the shared concern we have about this issue and our belief that we could become part of the solution through bringing transparency to the supply chains for these minerals.

Recently, a petition was filed by the National Association of Manufacturers, the US Chamber of Commerce, and the Business Roundtable for judicial review of the final rule implementing Section 1502. The MSG would like to take this opportunity to urge all stakeholders to continue the important work underway to address the critical issue of transparency in the supply chains for these minerals. Our organizations will also continue to work towards this end, as we strongly believe these efforts are a matter of corporate social responsibility. In this context, we would like to make three points:

- As early as 2007, companies and industry associations, working with investors and advocacy groups, have developed programs that advance responsible sourcing of minerals. Several initiatives, such as those coordinated through the Electronics Industry Citizenship Coalition (EICC) and Global e-Sustainability Initiative (GeSI) Workgroup were initiated before Section 1502 was enacted and many MSG members will continue regardless of this lawsuit.
- By establishing expectations within our supply chains, we are creating demand for responsibly sourced minerals.
- Ultimately, a cross-industry approach to this issue is needed for responsible sourcing of minerals from the Great Lakes region in Central Africa. The active participation of all stakeholders is needed to make meaningful progress. We welcome additional participation in the development and implementation of a common approach.

The organizations in the MSG will continue to work together to eliminate the link between violence and human rights abuses and the mineral trade in the DRC and surrounding countries regardless of the lawsuit. We all agree that the violence and abuse in this region of the world must end and that an important part of the solution is the efficient and responsible minerals sourcing process in which many MSG members are already participating.

¹ MSG submissions: [November 17, 2010](#), [March 2, 2011](#), [August 22, 2011](#), and [November 10, 2011](#).

² MSG had in-person meetings and one group conference call with SEC staff, SEC commissioners, or Commissioner Schapiro on: [Nov/17/10](#), [Mar/11/11](#), [Jun/22/11](#), [Feb/13/12](#), [Feb/15/12](#), and [Feb/17/12](#).

³ MSG panelists: Tim Mohin, Advanced Micro Devices Inc.; Bennett Freeman, Calvert Investments; Darren Fenwick, Enough Project; Sandy Merber, General Electric Company; Mike Davis, Global Witness; and Susan Baker, Trillium Asset Management.

Advanced Micro Devices, Inc.



Africa Faith and Justice Network



American Baptist Home Mission Societies



Boston Common Asset Management



Bureau d'Etudes Scientifiques et Techniques



Calvert Investments



Child Labor Coalition



Christian Brothers Investment Services, Inc.



Comboni Missionaries



Congo Global Action



CREA: Center for Reflection, Education and Action



Dell, Inc.



Enough Project



Everence Financial



Future 500



General Electric Company



Hewlett-Packard Company



Intel Corporation



Interfaith Center on Corporate Responsibility



Jewish World Watch



FIGHT GENOCIDE.
DO NOT STAND IDLY BY.
WWW.JWW.ORG

KEMET Electronics Corp.



Marianists International



Mercy Investment Services, Inc.



Microsoft Corporation



Midwest Coalition for Responsible Investment



Missionary Oblates of Mary Immaculate –
JPIC office



Motorola Solutions Inc.



National Consumers League



NEI Investments



Partnership Africa Canada



Responsible Sourcing Network,
a project of As You Sow



Royal Philips Electronics



Sisters of St. Dominic of Caldwell, NJ



Sustainalytics



Trillium Asset Management, LLC



Tri-State Coalition for Responsible Investment



US SIF: The Forum for Sustainable and
Responsible Investment



Veris Wealth Partners



Wespath Investment Management

