



Conflict Minerals: Basics and Responsibilities

An abundance of modern products contain one or more of the four primary conflict minerals—tantalum, tin, tungsten and gold (3TG). When sourced from the Democratic Republic of Congo (DRC) and adjoining countries, procurement of these minerals can be potentially conflicted by violent militias that take control of mines to generate personal profits. After being refined at smelters, these minerals are resold and built into our consumer products.

Since 2010, the Dodd-Frank Wall Street Reform and Consumer Protection Act requires annual filings from publicly held companies whose products require one or more 3TG minerals. By tracing and auditing susceptible supply chains, this act is the first legislative step that mitigates the risk of conflict minerals being used in various consumer products.

Building your Compliance Program with STTAS

Participating companies will report their annual findings to the Securities and Exchange Commission, and often, to their customers as well. Sandler & Travis helps you accomplish this by collecting, analyzing and managing the pertinent data that the SEC requires and your clients demand.

Here's how we can help

- Initiating your compliance program starts with STTAS identifying your risk, followed by recommending and implementing due diligence procedures that cover solicitation, data gathering and analysis efforts.
- We will work directly with your clients to give them the peace of mind that you are complying with a regulatory and filing requirements.
- Our process deploys unique efficiencies that consolidate supplier data across all tiers in order to track where conflict sourcing occurs.
- We assist our clients with following OECD due diligence guidelines for their supply chains.
- As updates on international regulations and legislation are made, we will keep you informed, but also perform process analysis to identify any real-time changes that need to be made in order to remain compliant.

STTAS Professionals

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About Sandler & Travis

Sandler & Travis comprises more than 900 global trade professionals serving North America, South America, Asia, Africa, Europe and the Middle East. We provide import and export services to some of the world's largest multinational corporations and our clients are involved in all major industry sectors.

Our services can be tailored to each company's needs and budget, from solving a single issue in-country to full-service contract Global Trade Compliance Management. STTAS can advise your company on compliance best practices, guide your global business processes, and provide hands-on business operations support by designing and executing a solid compliance program.

