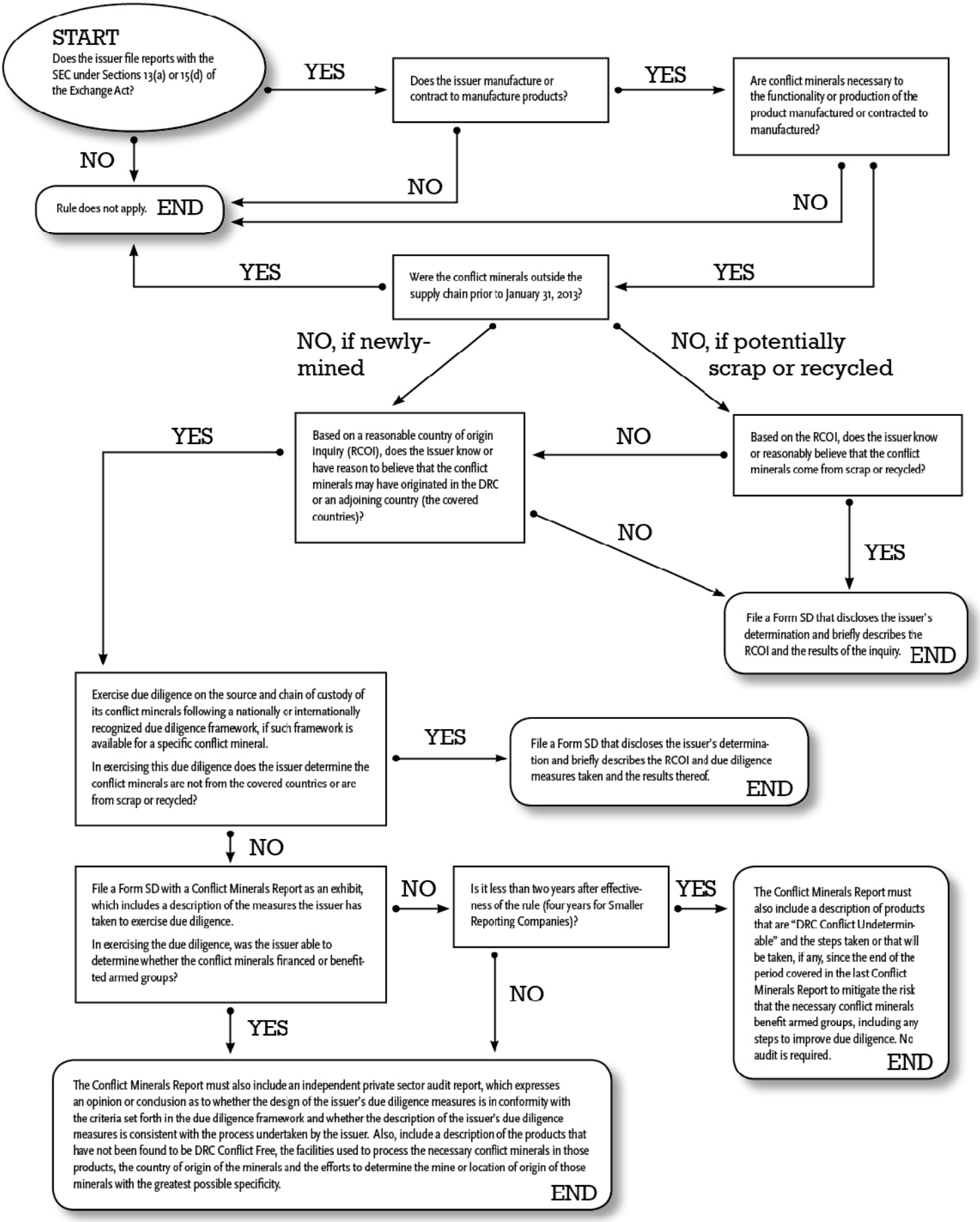
START
Does the issuer file reports with the SEC under Sections 13(a) or 15(d) of the Exchange Act?
YES
Does the issuer manufacture or contract to manufacture products?
YES
Are conflict minerals necessary to the functionality or production of the product manufactured or contracted to manufactured?
NO
Rule does not apply. END
NO
NO
YES
Were the conflict minerals outside the supply chain prior to January 31, 2013?
YES
NO, if newly-mined
NO, if potentially scrap or recycled
YES
Based on a reasonable country of origin inquiry (RCOI), does the issuer know or have reason to believe that the conflict minerals may have originated in the DRC or an adjoining country (the covered countries)?
NO
Based on the RCOI, does the issuer know or reasonably believe that the conflict minerals come from scrap or recycled?
NO
YES
File a Form SD that discloses the issuer's determination and briefly describes the RCOI and the results of the inquiry. END
Exercise due diligence on the source and chain of custody of its conflict minerals following a nationally or internationally recognized due diligence framework, if such framework is available for a specific conflict mineral.
In exercising this due diligence does the issuer determine the conflict minerals are not from the covered countries or are from scrap or recycled?
YES
File a Form SD that discloses the issuer's determination and briefly describes the RCOI and due diligence measures taken and the results thereof. END
NO
File a Form SD with a Conflict Minerals Report as an exhibit, which includes a description of the measures the issuer has taken to exercise due diligence.
In exercising the due diligence, was the issuer able to determine whether the conflict minerals financed or benefitted armed groups?
NO
Is it less than two years after effectiveness of the rule (four years for Smaller Reporting Companies)?
YES
The Conflict Minerals Report must also include a description of products that are "DRC Conflict Undeterminable" and the steps taken or that will be taken, if any, since the end of the period covered in the last Conflict Minerals Report to mitigate the risk that the necessary conflict minerals benefit armed groups, including any steps to improve due diligence. No audit is required. END
NO
YES
The Conflict Minerals Report must also include an independent private sector audit report, which expresses an opinion or conclusion as to whether the design of the issuer's due diligence measures is in conformity with the criteria set forth in the due diligence framework and whether the description of the issuer's due diligence measures is consistent with the process undertaken by the issuer. Also, include a description of the products that have not been found to be DRC Conflict Free, the facilities used to process the necessary conflict minerals in those products, the country of origin of the minerals and the efforts to determine the mine or location of origin of those minerals with the greatest possible specificity. END