

3E Supply Chain Solutions for Conflict Minerals

Mitigate and manage supply chain product compliance risk with access to 3E's powerful combination of content, services and technology

Overview

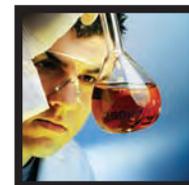
If you are among the professionals feeling the pressure associated with figuring out what Conflict Minerals means, how it affects your company and what exactly should be done about it, relax. You have made a great decision by turning to 3E Company.

The marketplace is crowded with Conflict Minerals solutions. And time is short to prepare for compliance ahead of the May 2014 reporting deadline. It is critical to quickly assess 1. Your organizational exposure, 2. Your appetite for risk and 3. What manpower you have available internally to address the problem. If the answers are 1. High or Unknown, 2. Low and 3. Few, then 3E is the right solution for you.

3E offers a comprehensive solution set to help our customers satisfy the obligations set forth by

Dodd Frank Section 1502 and meet the demands of internal stakeholders for Conflict Mineral status information. Our approach closely aligns with the OECD guidance to conduct supplier engagement and support due diligence at the supplier or product level in order to identify the presence of tin, tantalum, tungsten or gold and attempt to determine the origin of those minerals.

Our solution includes policy development support, supplier engagement, data gathering, data consolidation and auditable process documentation. In addition, 3E SC provides a robust technology platform to collect, organize, analyze, manage, report and provide enterprise access to a variety of compliance conditions related to your suppliers, raw materials and products. Our solution goes far beyond a do it yourself software tool and offers more certain, cost effective and reusable methodology than would a customized consulting engagement. The measures employed on behalf of our clients in fulfillment of the 3E Conflict Minerals solution rely on a dedicated team and years of experience developing relationships with global manufactures in order to effectively and efficiently collect and maintain information in a variety of languages and formats.





Proven Track Record

For more than 20 years we have successfully obtained and enriched data and developed actionable intelligence for our customers.

3E boasts tenured, in house skilled professionals with subject matter expertise and language skills who effectively and efficiently engage suppliers to successfully elicit information and develop content to drive a compliant Conflict Minerals program.

The 3E Approach

Commitment to Product Development and Innovation

We have the capacity to manage large efforts and the staying power to protect your investment. We continually invest in our 3ESC platform to deliver unprecedented opportunities for supply chain risk management which will bolster your value proposition as you gain visibility into the attributes and conditions of your suppliers and products.

An important advantage of 3E's strategy is the development of a foundation which enables our customers to leverage their investment in Conflict Minerals compliance into fulfillment of a broader scope of supply chain risk management. The 3E solution can be utilized to obtain, document and manage a variety of product specific data in support of a complete compliance based product risk profile.

Program Development

3E has the ability to mobilize quickly and jump start an appropriate, scalable and cost effective Conflict Minerals program. Where we begin depends on where you left off. We can support the development of a policy statement while executing a Heat Mapping exercise to determine which products and suppliers require attention.

Supplier Engagement

Once suppliers of interest are identified we will execute a supplier engagement process. Our goal is to satisfy the due diligence requirements of the Wall Street Reform Act and maximize the number of accurate responses, while delivering a high cost to value ratio. Supplier education is a relatively low cost way to significantly improve response rates. We initiate the inquiry process with an outreach campaign to help suppliers understand your need for information. If you have not already

done so, this is an ideal opportunity to provide suppliers with your organization's policy regarding the use of conflict minerals and to make them aware of any consequences of supplier violations of the policy or for non-cooperation.

Web based training sessions are conducted to provide a high level overview of the obligation and outline the procedure for providing the required information in a standardized format. Training and supplier contact is conducted in the native language of the supplier and during business hours of their location.

3E suggests using the opportunity to also request supporting information such as material or ingredient disclosures that will help with other supply chain risk related activities beyond Conflict Minerals compliance.





“Do” Diligence

The ultimate goal is to build a verifiable credential for compliance. Following the education sessions, 3E distributes conflict mineral questionnaires and answers incoming vendor questions, carefully collecting all incoming questionnaires and identifying all non-respondents for ongoing follow up. 3E’s obtainment specialists will work tirelessly to gather information, making several attempts. Where suppliers are reluctant or unresponsive 3E will ask again and again, calling as needed. We will do so in the appropriate language and time zone. The efforts to elicit information will be carefully documented to substantiate due diligence. 3E will translate the responses to other languages as required.

In cases where the supplier is unable or unwilling to complete a questionnaire,

3E may be able to provide primary determination of the likelihood or presence of 3TG based on the availability of other product disclosures.

Information Management

The 3E SC platform utilizes three primary data objects including Supplier, Product and Raw Material. (Depending on your business you may choose to use either or both Product and Raw Material.) Conflict Mineral questionnaire responses, any provided material declarations and other supporting documentation such as Smelter Certifications will be accessible at the supplier or product level as appropriate. Products will be easily identifiable as *Does not Contain, Conflict Free, Undeterminable, or Potential Minerals of Concern.*

Utilizing the 3ESC system enables easy visibility to all products containing tin,

tantalum, tungsten, or gold at both the supplier level and the product level. Users can access information to support completion of Form SD or to satisfy auditor’s requirements for proof of due diligence process adherence. In addition, 3ESC will enable confident and efficient responses to your customers’ inquiries regarding Conflict Minerals which are sure to come. Further, the system can easily support other obligations such as REACH, RoHS, CA Prop 65 and other Supply Chain Compliance needs.

3E Assure

In some cases the burden of responding to stakeholder inquiries equals or surpasses that of completing Form SD. 3ESC provides several means of meeting stakeholder’s needs. First, compliance statements are easily exportable at the product level or company level. Second, our experts can complete custom surveys on your behalf utilizing information available in 3ESC. Third, you can utilize our 24/7 call center to provide access to information about your products to your stakeholders via a toll free phone number.

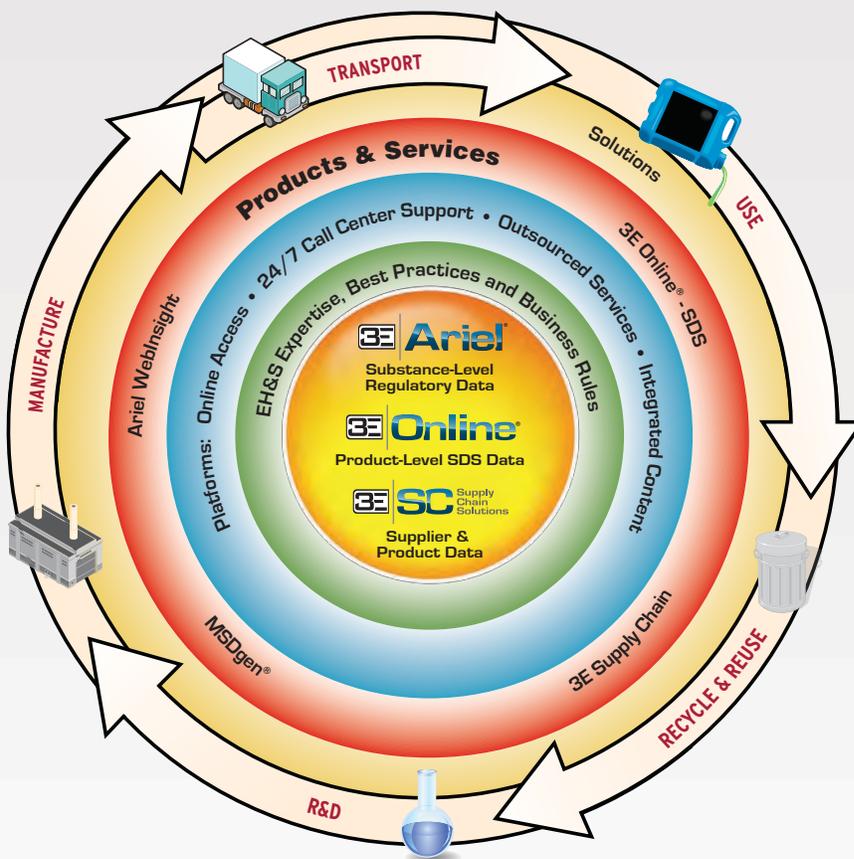
Whether you are subject to the regulation or obligated because of customer demand; whether you are a manufacturer, retailer or distributor; we are happy to tailor a program that best fits your unique needs. Let us turn your Conflict Minerals compliance problem into our Conflict Minerals compliance solution.



3E Supply Chain Solutions for Conflict Minerals

Full Chemical Lifecycle Management

3E Company's comprehensive suite of data products and information services enables improved compliance with global Environmental Health & Safety (EH&S) and obligatory requirements related to the safe manufacturing, distribution, transportation, usage and disposal of chemicals and hazardous products. Whether you are a manufacturer, distributor, transporter, retailer or corporate user of chemicals or hazardous products, 3E can deliver a program specific to the EH&S compliance information and management needs of your organization that provides benefits to the entire enterprise and throughout the supply chain. 3E Company's full product lifecycle and supply chain approach provides a single, integrated solution for managing EH&S capabilities, resulting in reduced cost, risk and liability while improving business and compliance processes.



EH&S Challenges

With the spotlight shining brightly on EH&S compliance, companies are challenged with finding effective ways to address the complexities and intricacies of EH&S compliance management. Not only do these challenges stem from a constantly-changing regulatory landscape, but also from a scarcity of newcomers to the EH&S field, and pressure on companies to manage increased responsibility with fewer resources. Addressing these issues requires broad and deep domain expertise—expertise that doesn't always exist within the company. And if it does, this expertise is probably best utilized driving the company's overall compliance strategy, not bogged down with paperwork or the administrative burdens associated with maintaining compliance.

EH&S Solutions

At 3E Company, we understand the business and the burden of EH&S information and compliance management. 3E Company is a comprehensive, one-stop solution for content, tools and services for companies that want to take effective leadership and control of their product stewardship and EH&S compliance activities. 3E's products and services help companies make the transition from simply managing for compliance, to cutting-edge product stewardship practices that deliver tangible and sustainable business results.

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