

# Conflict Minerals

**Background.** Armed groups operating in the eastern Democratic Republic of the Congo (DRC) have controlled many of the region's mines or transit routes and have engaged in armed conflict, as well as some of the world's worst human rights violations. Concern that proceeds from the mining of minerals have been used to fund extreme violence in that region led to a requirement in the U.S. Dodd-Frank Financial Reform Law of 2010, that U.S. publicly-traded companies must disclose any "conflict minerals" necessary to the functionality or production of products they manufacture or contract to manufacture. The conflict minerals are tin, tungsten, tantalum and gold (called the 3TG's). Companies using conflict minerals must also disclose their supply chain inquiries to verify whether these minerals originated in the DRC or adjoining countries.

On August 22, 2012, the SEC approved the final rule on conflict minerals. All public companies must evaluate their product lines to determine whether they contain necessary conflict minerals and if so, file a Form SD by May 31 annually beginning in 2014, for products they manufacture or contract to manufacture in the year 2013. While the burden of compliance is on the public companies who manufacture those products, members of their supply chains for those products are also impacted.

[Text of the U.S. Conflict Minerals Law](#)  
[Conflict Minerals - SEC Small Entity Compliance Guide](#)  
[Text of the final Conflict Minerals Rule - Fed Register](#)

**Conflict Minerals Policy.** PCCables.com Inc. finds the Violence in the DRC and adjoining countries a disgrace to all. We have adopted a Policy of not purchasing any of the 3TGs Minerals from the regions as suggest by the SEC we have demanded our contract Manufactures to adopt this same policy.

## **PCCables.com Expectations for Suppliers and Manufactures.**

- **Supply "DRC Conflict Free" materials.** Under PCCables.com conflict mineral's policy, suppliers are expected to supply materials to PCCables.com that are "DRC conflict free," which means either: 1) any 3TGs necessary to the functionality or production of supplied materials must not directly or indirectly fund armed conflict in the DRC or adjoining countries, or 2) any 3TGs must be from recycled or scrap sources.\*
- **Adopt conflict minerals policies.** Suppliers to PCCables.com must adopt a policy regarding conflict minerals consistent with PCCables.com's policy, implement management systems to support compliance with their policy and require their suppliers to take the same steps.
- **Gather Smelter information for our manufactures and suppliers.**

[Conflict Free Smelter program](#), smelter lists

PCCables.com Inc. encourages its suppliers and manufactures to responsibly source 3TGs from the DRC and adjoining countries through smelters and refiners validated as DRC Conflict Free through the CFS or similar programs.

Link to CFSI website: <http://www.conflictreesourcing.org/>

Link to PCCables.com Inc Conflict Minerals Declaration: [CFSI\\_CMRT3-01.pdf](#)

For more information on PCCables.com please contact [support@pccables.com](mailto:support@pccables.com).

Conflict minerals are from "recycled or scrap sources" if they are from recycled metals, which are reclaimed end-user or post-consumer products, or scrap processed metals created during product manufacturing. Recycled metal includes excess, obsolete, defective and scrap metal materials that contain refined or processed metals that are appropriate to recycle in the production of tin, tantalum, tungsten, and/or gold. Minerals partially processed, unprocessed, or a "bi-product" from another ore are not included in the definition of recycled metal. Item 1.01(d)(6) for Form SD, 77 Fed. Reg. 56274, 56364 (Sept. 12, 2012).

