

Help for Suppliers Responding to ITW's Conflict Minerals Request

Background Information

War in the Democratic Republic of the Congo (DRC)

At many sites in the Democratic Republic of the Congo ("DRC") and the nine adjoining countries sharing an internationally recognized border with the DRC, including Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia (also known as the "Covered Countries"), armed groups illegally tax, extort, and coerce civilians to work. Miners, including children, work up to 48-hour shifts amidst deadly mudslides and tunnel collapses. Rebel groups use rape and violence to control the local population and use proceeds from mining operations to continue financing regional conflict.

The US Government response to the humanitarian situation in the DRC

On July 21, 2010, the Dodd-Frank Wall Street Reform and Consumer Protection Act was signed into law, its primary focus being financial regulatory reform. **§1502 of the Act** specifically required the U.S. Securities and Exchange Commission ("SEC") to adopt rules requiring public companies with tin, tantalum, tungsten and/or gold, also known together as "3TG" in their products to conduct an inquiry (a "reasonable country of origin inquiry", or RCOI) to determine the country of origin of their 3TG. As a result, on August 22, 2012, the SEC adopted the rule mandated by the Dodd-Frank Act, which requires public companies to:

- File a report once a year with the SEC describing their RCOI process; and
- If the origin of any 3TG is the DRC or an adjoining country ("Covered Countries"), file a more detailed Conflict Minerals Report and have their process audited.





As a public filer, ITW and its businesses, including those outside of the U.S., must comply with the 3TG disclosure rules adopted by the SEC. **If you are a supplier of product that may contain tin, tantalum, tungsten and/or gold to one of ITW's businesses, you are a part of ITW's supply chain and therefore are subject to report on the 3TG that may be found within the ITW business' end product.** ITW's Conflict Minerals Policy Statement, Supplier Code of Conduct and Supplier Terms and Conditions each provide further guidance with respect to our expectations for our suppliers.

How to satisfy our request

Determine whether there is tin, tantalum, tungsten and/or gold in the product you sell to us.

If you *do not know* whether or not your product contains 3TG, read #1-3 below carefully to help you determine whether or not your product contains tin, tantalum, tungsten or gold:

- 1. Review the SEC Rule.**
If 3TG is necessary to the functionality or production of a product manufactured (or contracted to be manufactured) by the Company, the Company must comply with the conflict minerals rule designed to determine whether the 3TG originated in the Covered Countries. **Tin, tantalum, tungsten, and gold** are the only minerals covered by the rule at this time.
- 2. Seek guidance from those at your company who know your product to determine whether any 3TG is contained in your product – is any tin, tantalum, tungsten and/or gold contained in products that you supply to an ITW business?**
Ask people in your organization who have relevant knowledge (for example: engineering, manufacturing, environmental, chemical product safety, purchasing, quality control, etc.) whether any of your products contain tin, tantalum, tungsten or gold. The chart below lists typical products that may contain 3TG, which may help their determination.

Derivative Metals	Cassiterite	Columbite-Tantalite	Wolframite	Gold
Minerals	<p>Tin Often used to coat other metals for corrosion prevention and to create alloys</p> 	<p>Tantalum Stores electricity and is used in alloys for its strength</p> 	<p>Tungsten Commonly used in tools, cell phones, and high-temperature situations, also used in alloys for its strength</p> 	<p>Gold Malleable, not highly corrosive, and highly conductive to electricity and heat</p> 
Examples of products or applications	<ul style="list-style-type: none"> Alloys (Bronze, brass, pewter) Anodes (electric flows) Automotive/car parts (including but not limited to): fuel tank, sealants, wiring, radiator, seat cushions, engine parts, gears, pumps, joints, windshields, etc. Batteries Biocides: fungicide, bactericide, insecticide (AW 75-D, Bio-Met TBTO, Biomet, Biomet 75, BTO, Butinox, C-SN-9, Hexabutylidistannoxane, Hexabutyliditin, etc) Brass Bronze (tin + copper) Capacitors Containers (tin coats other metals for protection) Corrosion resistant coatings Dielectrics (electrical insulator) Electrical Conductors Electronics (including but not limited to): portable electronics & high-speed processing devices (mobile/cell phones, computers, digital cameras, video game consoles), calculators, GPS devices, televisions, etc. Flame retardants or anti-microbial treatments applied to various materials Food/drink product packaging Gas tanks/radiator heater tanks Glass (as an additive for durability) Glass coatings (to prevent fissures) 	<ul style="list-style-type: none"> Alloys Automotive/car parts (including but not limited to): audio equipment, climate control, sensors, wiper system, seatbelts, fuel pump Camera lenses Capacitors & high-power resistors Communication systems Contacts and connectors found in electronics Electronics (including but not limited to): portable electronics & high-speed processing devices (mobile/cell phones, computers, digital cameras, video game consoles), calculators, GPS devices, televisions, etc. High-speed machine tools Laboratory Equipment LED lights Plating Printed Circuit Board Assemblies (PCBAs) Wire (IC wire bonding) 	<ul style="list-style-type: none"> Automotive/car parts: (including but not limited to): circuits, gear teeth, bearing components. Capacitors Carbide, carbide tools Coatings Compact fluorescents (CFLs) (in their emitter coils) Counterweights Drills Electrodes Electronics (including but not limited to): portable electronics & high-speed processing devices (mobile/cell phones, computers, digital cameras, video game consoles), calculators, GPS devices, televisions, etc. Filaments in older-style (not energy saving) electric bulbs Halogen tungsten lamps (energy saving) Hardware such as nails, screws, hooks, mounting equipment Heating elements Heating elements High refractive index glass High temperature alloys High temperature lubricants 	<ul style="list-style-type: none"> Aerospace equipment Automotive/car parts (including but not limited to): on board electronics, fuel cells. Capacitors Coatings/bonding layers Communications equipment Connecting wires & connection strips Connectors – including edge connectors (used with microprocessor and memory chips, motherboards) & plug-and-socket connectors used to attach cables Contacts, switch, and relay Control systems Electrodes Electronics (including but not limited to): portable electronics & high-speed processing devices (mobile/cell phones, computers, digital cameras, video game consoles), calculators, GPS devices, televisions, etc. High temperature allocations Joints (in solder) Metal wire Plating

	<ul style="list-style-type: none"> • Heating elements • High performance paint manufacture • Inks • Kitchen utensils, clips, pins, metal signs • Paint, oil, polish, cleaners, etc. • Pewter • Polyester • Preservatives for wood, textiles, paper, and electrical equipment • PVC (as an intermediate) • PVC and plastics (as heat stabilizer) – in electric cables, vinyl, composite or “faux” wood, clear plastics • Resistors • Roofing, weather insulator • Solar panels • Solder (tin + lead) – used for joining pipes, for seams on products & packaging and for Printed Circuit Board Assemblies (PCBAs) • solderable coatings • Stannic chloride (stabilizer in perfume) • Stannic oxide (catalyst/steel polishing powder) • Steel plating • Urethane coatings and polyurethane foam protection • Water purifier • Wire & cable coating 		<p>(tungsten disulfide)</p> <ul style="list-style-type: none"> • High-speed cutting tools • Joints • Lighting • Magnetrons for microwave ovens • Metal wires • Power resistors • Printed Circuit Board Assemblies (PCBAs) • Tools (often when alloyed with steel) • Weights • Welding tools 	<ul style="list-style-type: none"> • Radiation shielding
--	---	--	---	---

Other Necessary Considerations:

- **Packaging.** If 3TG is contained in the packaging but not in the product, it is not subject to the rule. If the product you sell is the *packaging itself*, it is subject to the rule.
- **Embellishments and decorations not subject to the rule.** If 3TG is used in a tool or piece of equipment that is used in production, or as an embellishment or decoration to the product, the rule does not apply.
- **If not intended to be in product, not subject to the rule.** If 3TG is present only as a contaminant or naturally occurring by-product, the rule does not apply.
- **Prototypes and demonstration devices not subject to the rule.** However, once any of these are offered for sale, they are subject to the rule.
- **Catalysts.** If 3TG is used as a catalyst or in a similar manner in another process that is necessary to produce the product but is not contained in the product, it is considered not “necessary to the production” of a product and as such, is not covered by the 3TG rules.
- **Recycled and scrap metals.** If all your 3TG is from recycled or scrap sources, it is considered conflict free but must still be included in the reporting templates.

3. **Is any 3TG contained in products that your business contracts to manufacture and sells to an ITW business?**

A business contracts to manufacture a product if the business has any influence regarding the manufacture of the product. Contracting to purchase a product for resale without incorporating it into your own product, and without influencing the manufacture of the ordered product, would not subject a business to the rule. A business does not “contract to manufacture” a product if it does no more than: (1) specifies or negotiates contractual terms that do not directly relate to the manufacturing of the product, (2) affixes its brand, mark, logo or label to a generic product manufactured by a third party, or (3) services, maintains, or repairs a product manufactured by a third party. **However, if a contract specifies that the manufacturer uses tin, tantalum, tungsten and/or gold, that would be viewed as contracting to manufacture even if no influence is exerted on the overall manufacturing process.**

My product contains 3TG

If your answer to 2 or 3 above is YES and any tin, tantalum, tungsten and/or gold is contained in the product you sell to us, we need you to begin your due diligence by performing a Reasonable Country of Origin Inquiry (RCOI). This means we need you to send inquiries to your suppliers requesting they fill out a [Conflict Minerals Reporting Template \(CMRT\)](#) for you. You should send inquiries to all suppliers you believe sell you product that contains tin, tantalum, tungsten or gold. IF YOU ARE UNSURE whether or not a supplier’s product contains 3TG, include the supplier in your inquiries to ensure your response is as complete as possible. Please email your completed CMRT to the person at the ITW business who requested it from you.

For general questions either contact your ITW business contact (the person who sent you the letter) or email conflictminerals@itw.com.

My product does not contain 3TG

If your answers to 2 and 3 above are both NO, we still need you to submit a [Conflict Minerals Reporting Template \(CMRT\)](#) that indicates your product does not contain 3TG.

For general questions either contact your ITW business contact (the person who sent you the letter) or email conflictminerals@itw.com.

Helpful links

[Responsible Minerals Initiative \(RMI\):](#)

- RMI CMRT Completion Guide ([English](#)) ([Chinese](#)) ([Japanese](#))
- [Engaging Distributors for Conflict Minerals Information](#)

[Automotive Industry Action Group \(AIAG\):](#)

- [Informational Modules \(training videos\) for Automotive Suppliers](#) (if you do not have a log-in you will be prompted to create one)

[OECD International Framework](#)

[The Enough Project](#) (for more information about Central African conflict)