GreenSoft
Technology, Inc.

Compliance is a moving target.
We make it easy.

Smelter or Refiner (SOR) Validation

The Next Step in Conflict Minerals Due Diligence

Conflict Minerals Declarations Are Coming Up Short

Since companies began receiving Conflict Minerals declarations from their suppliers in fulfillment of Section 1502 of the Dodd-Frank Act, the SEC and the NGOs reviewing the submitted data have identified weaknesses and gaps. Many smelters or refiners (SORs) identified in supplier disclosures have not been validated as legitimate. Others which have been confirmed as legitimate are lacking validation regarding sourcing of conflict minerals from covered countries.

To address this problem, it is necessary to implement a system of communicating with the disclosed SORs directly or a chain of communications with the suppliers and their sub-tier suppliers. GreenSoft offers an SOR Validation service to communicate with the SORs directly, or to follow up diligently with the supply chain to address this issue.

How SOR Validation Works

Initial SOR List Review and Quality Check
GreenSoft will examine the SOR list provided by the customer or extracted from CMRTs provided by the customer's suppliers. Any SORs with missing or incorrect information will be identified, and SORs or suppliers will be contacted for clarification or correction.

Identify and Remove Duplicate SORs
GreenSoft will review the SOR list against GreenSoft's SOR Alias Database (updated weekly) and remove all duplicate SORs from the list.

SOR Validation by GreenSoft Technology, Inc.
The Process

Customer provides SOR list.

BONUS! If customer doesn't have a SOR list, we can create one for you by extracting SOR data from your CMRT forms!

GreenSoft scrubs and validates SOR list.
- Remove duplicate SORs
- Remove SORs already considered validated
- Validate remaining in-scope SORs

GreenSoft communicates directly with SORs and/or suppliers to collect SOR validation data and documents.

THROUGHOUT: A dedicated GreenSoft Project Manager regularly keeps customer updated on project status and deliverables. GreenSoft continually re-assesses SOR lists based on database updates.

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RESPONSIBLE MINERALS INITIATIVE

ISO 9001:2015 Certified

www.greensofttech.com

Identify and Remove SORs Out of Scope for SOR Validation

Some SORs are not in scope for SOR validation. Examples are SORs which are CFSI/CFSP certified or LBMA/RJC/DMCC listed. These are SORs which are considered to be adequately validated already do not need additional validation. Because some customers may prefer to eliminate some items (such as DMCC) from the list, GreenSoft will confirm the out-of-scope SOR list with the customer when the project starts, as shown below.

	Smelter Analysis		
	Category	Organization	Source
GreenSoft considers these organizations credible sources for conflict minerals information and validates the SMELTERS OR REFINERS (SORs) against their publications for conflict free status and legitimacy.	CSOR (Certified Smelter or Refiner)	CFSI - Conflict Free Sourcing Initiative	CFSP: Conflict-Free Smelter Program
	CSOR (Certified Smelter or Refiner)	RJC: Responsible Jewellery Council	Chain-of-Custody certification documents
	CSOR (Certified Smelter or Refiner)	LBMA: London Bullion Market Association	Good Delivery List
	CSOR (Certified Smelter or Refiner)	DMCC: Dubai Multi Commodity Centre	MDB: Market Deliverable Brand
	LSOR (Legitimate Smelter or Refiner)	DOC: Department of Commerce	DOC-Conflict Mineral Report
	LSOR (Legitimate Smelter or Refiner)	Intel	Quarterly Smelter Updates
	LSOR (Legitimate Smelter or Refiner)	Apple	Quarterly Smelter Updates
	LSOR (Legitimate Smelter or Refiner)	CFSI - Conflict Free Sourcing Initiative	CFSP Active: committed to undergo a CFSP audit
	LSOR (Legitimate Smelter or Refiner)	CFSI - Conflict Free Sourcing Initiative	CMRT Smelter Reference List

Number of SORs in Project	SORs uniquely identified in the project		
Number of SORs in Validation Scope	SORs not listed by any of the above credible organizations; or legitimate but mine location unknown. Definition might change per customer specific requirement.		

Validation of In-Scope SOR List

GreenSoft will start SOR Validation by identifying the contact information of the SORs and the suppliers. Before contacting the smelters directly, GreenSoft will first filter the in-scope SOR list by using the Alleged SOR Database, developed by GreenSoft by combining lists from industry organizations. Items in this list are considered legitimate, while items not on this list must be validated as legitimate.

Data Collection of SOR Validation

GreenSoft will communicate directly with SORs and/or suppliers to obtain the required SOR validation data. Information collected will include (but not limited to) the following:
- Evidential documents demonstrating that the SOR is a legitimate SOR
- Email statement confirming mine locations
- Statement on 100% use of recycled or scrap metals
- SOR Plan to become compliant (if found to be non-compliant)

Project Status Reporting and Deliverables

GreenSoft will provide a status update 1-2 times per month to allow the customer to track the progress. This allows the customer to examine data and evaluate progress on an ongoing basis. Project status update reports show the total number of SORs, the SORs in and out of scope for validation, the validation status, the mine status, and other information. A Project Manager is in contact with the customer throughout the project.

Re-Assessment

All databases mentioned above are updated at different frequencies. GreenSoft will re-assess the SOR list provided by the customer based on the database update. The customer will have updated information throughout the whole process of SOR Validation.

GreenSoft Technology: A Trusted Partner

GreenSoft has 14+ years of experience in managing compliance data and has a broad range of expertise in active and passive components, electrical and mechanical parts, packing and printing materials, and raw materials including organic or non-organic chemicals. GreenSoft has relationships with over 31,000 suppliers worldwide and is ISO 9001:2015 certified.

Get started with a FREE Risk Analysis & BOM Scrub! Contact us at:
+1-323-254-5961 or info@greensofttech.com

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