

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 Wall Street Reform and Consumer Protection Act of 2010**, the U.S. Securities and Exchange Commission (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 communication with the disclosed SORs directly, or a chain of communication with the suppliers and their sub-tier suppliers.

GreenSoft Technology offers an **SOR Validation** service to communicate with your SORs directly, or to follow-up diligently with your supply chain to address this issue.

GREENSOFT'S SOR VALIDATION PROCESS

Customer provides SOR list.

BONUS: If customer doesn't have an 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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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 (which is updated weekly), and remove all duplicate SORs from the list.

Identify and Remove Out-of-Scope SORs

Some SORs are not in-scope for SOR validation. Examples are SORs which are RMI certified or LBMA/RJC/DMCC listed. These are SORs which are considered to be adequately validated already and 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.

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.	Smelter Analysis		
	Category	Organization	Source
	CSOR (Certified Smelter or Refiner)	RMI: Responsible Minerals 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)	RMI: Responsible Minerals Initiative	CFSP Active: committed to undergo a CFSP audit
LSOR (Legitimate Smelter or Refiner)	RMI: Responsible Minerals 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.		

CONTACT US

Learn More and Request a Demo

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How SOR Validation Works (Continued)

Validation of In-Scope SOR List

GreenSoft will start SOR Validation by identifying the contact information of the SORs and the suppliers. Before contacting 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

GreenSoft will communicate directly with SORs and/or suppliers to obtain the required SOR validation data, such as evidential documents demonstrating that the SOR is legitimate, email statements confirming mine locations, and statements on the use of recycled or scrap metals.

Project Status Reporting and Deliverables

GreenSoft will provide an updated status report 1-2 times per month to allow the customer to track the project progress on an on-going basis. Project status update reports show the total number of SORs, the SORs in and out of scope, the validation status, the mine status, and other information. A dedicated Project Manager is assigned to the project and remains in contact with the customer throughout.

Re-Assessment

All databases mentioned above are updated on a regular basis. GreenSoft will re-assess the SOR list provided by the customer whenever a database is updated to ensure the customer has updated information throughout the entire SOR validation process.



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