

Brandeis University Policy on Conflict Minerals and Electronics Procurement

In 2015, the Brandeis chapter of STAND, a student-led movement to end mass atrocities, approached Procurement and Library & Technology Services to advocate that Brandeis University should join the "Conflict-Free Campus" initiative of the Enough Project, an organization that works to end genocide and crimes against humanity. After discussion with the Faculty Senate and Facilities Services, we agree that the Conflict-Free Campus initiative is consistent with Brandeis University's commitment to social justice.

Background:

In 2012, the Securities and Exchange Commission adopted a Final Rule that originated with [Section 1502](#) of the Dodd-Frank Wall Street Reform and Consumer Protection Act, requiring companies to publicly disclose their use of conflict minerals from the Democratic Republic of the Congo (DRC) or an adjoining country. The term "conflict minerals" refers to natural resources that are mined in a conflict zone with proceeds used to finance that conflict, often by terrorist organizations that control the local population through serious violations of human rights and international law. Conflict minerals include tantalum, tin, gold, or tungsten, all of which are used to make computers.

Policy:

The OECD Guidelines on [Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#) outline current best practices for complying with the Dodd-Frank Act. Consistent with these practices, Brandeis will pursue policies aimed at certifying the transparency of mineral supply chains from conflict zones, rather than boycotting minerals from those zones entirely, since boycotting rare but critical minerals may not always be feasible, and since boycotting can have adverse secondary effects, such as reducing employment for those living in conflict zones and encouraging smuggling.

Therefore, beginning in 2015, Brandeis University will ask the suppliers of our most commonly purchased and leased electronic items (desktop and laptop computers, printers, scanners, and copiers) to share with us the annual reports required by the SEC, showing due diligence in auditing the sources and provenance of potential conflict minerals in their supply chain. Many of the vendors from whom we buy electronics already do have such reports and statements on their web site, including the [Apple](#), [Intel](#), [Cisco](#), [Dell](#), [Microsoft](#) and [Xerox](#) corporations.

In the event that a supplier does not possess or provide information on whether their supply chains are conflict-free, our Director of Procurement will ask them to work with an assurance services group like [PriceWaterhouseCoopers](#) or request assistance from Brandeis STAND members or other similar groups that Brandeis Administration recommends to develop and document such awareness, and to come into compliance with the Dodd-Frank Act.