



# Conflict minerals policy

Interim Update: July 2023

An interim update of this policy was completed in July 2023 in order to update contact details and webpage links from the previous version. A full review of the policy is due to be completed.

## 1. Purpose

This policy publicly commits the University of Edinburgh to continuing to work collaboratively to eradicate conflict minerals from the goods it buys, reflecting its Strategy 2030 to “make the world a better place”.

## 2. Background

Profits from mining around the world may be being used to fund armed conflict, as many mines are under the control of armed groups. The most widely-cited instance of conflict minerals is in the Democratic Republic of Congo and neighboring countries, where tin, tungsten, tantalum and gold (3TG) are mined. These minerals are all used in the manufacture of electronics products, vehicles – in particular Electric Vehicles (battery operated and hybrid models) - and construction materials procured and used by the University, and sometimes as raw minerals in our laboratories. Other examples of minerals with potential links to conflict include copper, cobalt, platinum and diamonds.

A number of initiatives have been developed to break the link between mineral extraction and conflict, such as certified conflict-free smelters and refiners. Regulation requiring transparency from companies on mineral sourcing has been developed in the US (the Dodd-Frank Wall Street Reform and Consumer Protection Act, section 1502 on Conflict Minerals Dodd-Frank Act, 2010), and the EU (EU Conflict Mineral Regulations, 2021) which focuses on mineral importers, smelters and refiners of 3TG, though there is no current regulation within the UK.

The vast majority of electronics goods used by the University are bought through collaborative framework agreements for the Higher and Further Education sector or for the wider public sector, which are managed by procurement consortia such as the Advanced Procurement for Universities and Colleges (APUC), Scottish Government Procurement, and the Crown Commercial Services.

While some steps have historically been taken in the procurement processes used by the University to avoid conflict minerals in our supply chains, namely asking questions to suppliers during tender stage, there is a need for increased visibility of these efforts, and for further action. Efforts to reduce any indirect links our procurement practices may have to funding conflict reflect the University's wider commitment to Social Responsibility and Sustainability.

## 3. Scope

The University understands the term *conflict minerals* to mean any minerals that have been found to be being used to fund conflict in any part of the world. This is broader than a common understanding of conflict minerals to include only tin, tungsten, tantalum and gold (3TG) mined in the Democratic Republic of Congo and surrounding Great Lakes Region of Sub-Saharan Africa. While the focus of this policy is on conflict minerals, it is recognized that a conflict-free claim does not guarantee that human rights of workers are respected. This policy forms part of a broader approach to socially responsible supply chains.

This policy primarily covers procurement of electronics goods bought in large quantities through collaborative framework agreements, and vehicles purchased or leased on behalf of the University. This Policy also commits to ongoing efforts to bring conflict minerals considerations into smaller scale purchasing of electronics equipment containing minerals, and of minerals themselves (for use in laboratories), and other instances where there is a risk of conflict minerals, e.g. vehicles, construction. The policy also makes reference to collaboration between academic researchers, Social Responsibility and Sustainability and Procurement within the University to further our knowledge and action in the area of conflict minerals.

## 4. The Policy

1. When purchasing goods in large quantities, either directly or through public procurement consortia, the University is committed to striving to ensure these goods do not contain conflict minerals. Delegated authorities of Court, who are commissioning procurements or specifying relevant goods (or services), must demonstrate this commitment through:
  - a. Ensuring questions about what efforts suppliers are making to combat conflict minerals are included in tender or other acquisition processes, requesting concrete evidence of actions and outcomes,
  - b. Requesting detailed progress updates on conflict minerals at supplier contract management meetings (which can be as often as quarterly) during contract management stage,
  - c. Encouraging procurement consortia which manage framework agreements to continue to improve their practices regarding eradicating conflict minerals, including asking questions of suppliers at all stages of the procurement process
2. Efforts will be made to raise awareness among and advise students and staff regarding small-scale and personal purchases of goods that may contain conflict minerals and of raw minerals for use in laboratories
3. Academic research from different disciplines within the University on conflict minerals and related themes, plus external research on best practice, will be highlighted and recommendations shared with Procurement staff
4. Student engagement in conflict minerals through teaching, projects and events will be encouraged
5. Learning and best practice on conflict minerals will be shared with other institutions

## 5. Procedure and responsibility

This policy has been developed in collaboration between the Department of Social Responsibility and Sustainability (SRS) and Procurement Office, Finance Department. The Procurement Office will strongly recommend all delegated authorities and collaborative procurement partners take the appropriate steps outlined in point 1 above, with support from SRS where appropriate. The SRS Department is primarily responsible for points 2 to 4, that is, engaging with staff and students on small-scale purchasing, keeping track of relevant developments and research to inform engagement with suppliers, and offering/encouraging student engagement opportunities, including in partnership with the Edinburgh University Students' Association (EUSA). Point 5, sharing our learning with other institutions, is a shared responsibility between the Procurement Office and SRS.

## 6. Equality and diversity

This policy fits within a wider [procurement strategy](#) and advocates conforming to all applicable public procurement regulation, which includes consideration of Equalities Duties. A separate Equalities Impact

Assessment has therefore not been carried out for this specific policy.

## 7. Support systems

The SRS Department can provide contacts and advice regarding implementation of this policy.

## 8. Approval and review

Date policy approved	01/03/2016 Updated 12/10/2017 Interim update completed 06/07/2023 with full review due
Final approval by	Central Management Group
Consultations held	SRS Department carried out face to face and email consultation with stakeholders (procurement staff, academic staff, students, EUSA, selected suppliers, other universities, other experts and campaign groups) throughout 2015. SRS and Procurement teams, and SRS Committee, reviewed the policy in 2017.
Date of commencement of policy	Immediate.
Dates for review of policy	July 2019
How policy will be reviewed	Joint SRS and Procurement review of policy wording, alongside policy implementation report.
Policies superseded by this policy	

## 9. Contact

For further information, or if this policy is required in an alternative format, please contact the Department of Social Responsibility and Sustainability: [srs.department@ed.ac.uk](mailto:srs.department@ed.ac.uk) or 0131 651 3000