

## Conflict Minerals Nonaudit Services Independence Matrix



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This table does not address independence considerations unrelated to conflict minerals.

	May be engaged as CMR Auditor and currently is... <sup>1</sup>		Will not be engaged as CMR Auditor, but currently is...	
	Column A	Column B	Column C	Column D
	FS Auditor	Not FS Auditor (or Attestation Provider)	FS Auditor	Not FS Auditor (or Attestation Provider)
<b>CMR-Related Nonaudit Services<sup>2</sup>:</b>				
<b>Management Responsibilities</b> Examples include the following: <ul style="list-style-type: none"> <li>Setting policies or the strategic direction of conflict minerals activities</li> <li>Approving vendors</li> <li>Drafting policies or documentation</li> <li>Authorizing or approving client’s transactions</li> <li>Leading or participating in team responsible for conflict mineral policy implementation and compliance</li> </ul>	<i>Prohibited</i>	<i>Prohibited</i>	<i>Prohibited</i>	<i>Permissible</i>
<b>Assess, recommend or comment</b> Examples include the following: <ul style="list-style-type: none"> <li>IT systems related to tracking conflict minerals <ul style="list-style-type: none"> <li>Advising</li> <li>Analyzing, challenging and commenting</li> </ul> </li> <li>Consulting services <ul style="list-style-type: none"> <li>Performing workshop and assessment around the compliance process</li> <li>Assessing the company’s design of draft policies, procedures, process and pilot</li> <li>Identifying relevant gaps</li> <li>Providing comments on design, configuration, or implementation approaches performed by management</li> </ul> </li> </ul>	<i>Permissible (see note A)</i>	<i>Permissible (see note A)</i>	<i>Permissible</i>	<i>Permissible</i>

<ul style="list-style-type: none"> <li>o or a third party.</li> <li>o Providing advice to the client’s project manager or PMOs based on leading practices.</li> <li>o Providing sample drafts of communications that management could consider and distribute</li> <li>o Participating in meetings with client management as their advisors.</li> <li>o Providing comments on client’s projections or models developed by management but cannot be put in the position where the source of such information is the firm.</li> <li>o Assessing vendor compliance with management requirements</li> </ul>				
<b>Design, implement, prepare, lead or train</b>	<i>Prohibited</i>	<i>Prohibited</i>	<i>Prohibited</i>	<i>Permissible</i>
Examples include the following: <ul style="list-style-type: none"> <li>• IT systems related to tracking conflict minerals <ul style="list-style-type: none"> <li>o Design</li> <li>o Implementation</li> </ul> </li> <li>• Consulting services relative to: <ul style="list-style-type: none"> <li>o Program design, pilot and implementation ("turnkey")</li> <li>o Training and communication where auditor prepares and leads</li> </ul> </li> </ul>				
<b>Other</b>				
Examples include the following: <ul style="list-style-type: none"> <li>• SOC engagements for suppliers of issuer client (supplier audit)</li> </ul>	<i>Permissible (see note A)</i>	<i>Permissible (see note A)</i>	<i>Permissible</i>	<i>Permissible</i>

<sup>1</sup>The GAO conceptual framework (that is, threats and safeguards analysis) should be used to evaluate independence given the facts and circumstances of individual services not specifically prohibited (see GAGAS 3.46).

<sup>2</sup> This illustrative list is not exhaustive and should be considered in conjunction with applicable standards.

**Note A** - Services are generally permissible subject to the following: an evaluation of any threats and application of safeguards, where threats are significant, under the GAGAS conceptual framework; evaluation of management’s skills knowledge, or experience; establishing the necessary understanding with management; and applicable documentation requirements.

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