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Manufacturer's Corner: Conflict Mineral Reporting Requirement Still Illegal

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The *Manufacturer's Corner* returns from a self-imposed hiatus to bring you a brief update on the status of the SEC's conflict mineral rule. Readers may recall that the D.C. Circuit Court of Appeals previously [struck down](#) part of that rule as violating the First Amendment.

The Court agreed to reconsider the issue *en banc* in light of an intervening opinion. After doing so, a majority of the Court agreed to adhere to its original order.

A couple of points to note. First, the Court did not strike down the entire rule. Second, and related, the Court's opinion extends only to that portion of the rule that required conflict mineral disclosures on a company's website and in its reports to the SEC. The remainder of the rule, therefore, remains in effect.

As I wrote before, I expect we have not seen the end of this. I'll keep you updated as the case develops.

AUTHORS

- [Ryan C. Hardy](#)

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