Taming Wicked Problems: The Role of Framing in the Construction of Corporate Social Responsibility

Juliane Reinecke
Warwick Business School
University of Warwick
Coventry, CV4 7AL
United Kingdom
Phone: +44 (0) 24 7652 2818
Fax: +44 (0) 24 7652 3719
E-mail: Juliane.Reinecke@wbs.ac.uk

Shahzad (Shaz) Ansari
Judge Business School
University of Cambridge
Cambridge, CB2 1AG
United Kingdom
Phone: +44 1223 768 128
Fax: +44 1223 339701
Email: s.ansari@jbs.cam.ac.uk

ABSTRACT

While scholars have explained how business has increasingly taken on regulatory roles to address social and environmental challenges, less attention has been given to the process of how business is made responsible for wicked problems. Drawing on a study of 'conflict minerals' in the Democratic Republic of Congo, we examine the process through which companies became responsible for a humanitarian crisis. We contribute by 1) bridging insights from contentious performance and deliberative approaches – to present a model of corporate political responsibilization for a wicked problem that explains how a 'field frame' of responsibility can emerge 2) explaining shifting boundaries between public and private responsibilities and the changing role of the state as catalytic rather than coercive 3) showing how responsibility can be attributed to a target by framing an issue and its root cause in ways that allow such an attribution, and how the attribution can diffuse and solidify.

(149 words)

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Who is responsible for human rights violations, such as in the 2013 collapse of the Rana Plaza textile factory in Bangladesh, where over 1,100 workers died? Is it local factory operators flouting national laws, local governments failing to enforce these laws, multinational retailers squeezing suppliers, Western consumers wanting cheap goods, or the international community failing to intervene? The question of responsibility attribution has been posed for many complex social issues, such as extreme poverty, pandemics and climate change, described as 'wicked problems' (Conklin, 2006; Rittel and Webber, 1973). Wicked problems are large scale social challenges caught in causal webs of interlinking variables spanning national boundaries that complicate both their diagnosis and prognosis. The sheer magnitude and transnational scope of wicked problems in a globalizing world has spurred calls for a multi-pronged governance approach, with particular attention to companies and other private actors (Scherer and Palazzo, 2011).

While interpretations about what is public or private responsibility have shifted over time (Davis, Whitman and Zald, 2008), more recently, what Shamir (2008) calls an 'age of responsibilization', new CSR approaches have sought change in the traditional role of business as 'profit-only' actor. In the political version of CSR literature, businesses are seen to assume governance duties to solve major societal ills amid the regulatory voids left by the retreating state (Scherer and Palazzo, 2011). Yet, corporations also exploit regulatory voids (e.g., Banerjee, 2008) as evidenced by the persistence of modern day slavery (Crane, 2013) and large-scale corporate tax avoidance.

More attention is thus warranted to understanding how and why some regulatory voids become spaces for corporate intervention, while others are ignored or even exploited by companies. While political CSR scholarship has enlightened us about how regulatory voids have led to a political role for business, we know less about the *process* of how business is made responsible for societal problems. We argue that responsibility – the state of duty, accountabil-

ity and opportunity for action for an issue (Newell, 2005) – is socially constructed through collective negotiation. It would be productive to learn more about *how* interpretive shifts occur that prompt companies to rethink their socio-moral obligations for an issue of concern, *how* new modes of corporate engagement emerge, and *how* the boundaries between public and private responsibility get redefined.

Social movement scholars have demonstrated the influence of 'contentious performance' (Tilly, 2008) – civil society campaigns attacking companies for social and environmental ills – in inducing corporate behavioural change (e.g., Davis et al., 2008; den Hond and de Bakker, 2007; King and Pearce, 2010). However, scant attention is given to the social process of constructing responsibility and moral engagement through which companies may come to accept responsibility, rather than engage only in compliance or manipulation to avoid sanctions and appear legitimate (Scherer, Palazzo and Seidl, 2013). To understand this process, we draw on the foundational work on framing (Goffman, 1974), which explains how perceptions of social reality can be shaped. Snow and Benford (1988, p. 199) identified three core framing tasks to generate collective action for an issue; diagnosis, prognosis, and motivation. However, wicked problems complicate these framing tasks (Lewicki, Gray, and Elliott, 2003). It may be unclear 1) what the root cause is and who the central villain is given that wicked problems are caught in complex causal webs 2) what the solutions might be given the problem's ambiguity; and 3) how wider support is mobilized for implicating a new target in the problem given that prima facie its link with the problem is unclear. Given these challenges, it is worth examining how companies come to be responsibilized for a wicked problem.

To address these questions, we conduct a qualitative study of how companies assumed responsibility for a wicked problem in the Democratic Republic of Congo, described by UN Secretary General Ban Ki-moon in 2009 as 'a humanitarian crisis of catastrophic dimensions'. Whereas companies initially resisted responsibilization, we identified three major

4

'frame shifts' that led them to shift from denial to acquiescence, and, finally to assume a political role in conflict resolution. We identified mechanisms underlying these frame shifts, and explain how NGOs and the state created joint capacities for responsibilizing companies for what was previously seen to be a public problem. By focalizing the emotionally 'hot' issue of rape and linking it with the use of 'conflict minerals' in mobile phones NGOs constructed a causal link that brought the deadly violence in a far flung part of Congo close to consumers' lives. NGOs alongside sympathetic US policy makers enabled the inclusion of 'conflict minerals' reporting in the 2010 Dodd-Frank Act[i] in a hybrid governance arrangement that implicated companies in the humanitarian crisis.

THEORETICAL MOTIVATIONS

While notions about what are public versus private responsibilities are socially negotiated and historically contingent (Davis et al., 2008), growing business influence in a globalized world has inspired calls for companies to ameliorate social ills. But as companies take on political roles, the boundaries between public and private domains of responsibility have become increasingly blurred.

Political CSR, Social Movements and Framing

While companies have been accused of exploiting governance gaps to increase their hegemonic influence (Banerjee, 2008), political CSR scholars argue that companies are plugging governance gaps and taking on responsibility for delivering public goods (Matten and Crane, 2005; Scherer and Palazzo, 2007; 2011). One strand of political CSR explains how firms co-create new regimes of private governance (Scherer and Palazzo, 2011), such as social and environmental standards (Bartley, 2007) through deliberative engagement in contexts of incomplete regulation (Scherer and Palazzo, 2007). A second strand – 'contentious performance' (Tilly, 2008) – draws on the social movements literature to explain how firms are pressured by activists, consumers and others into assuming responsibility for social ills (den Hond and

de Bakker, 2007; King and Pearce, 2010). While the traditional focus was on how social movements target the state to ameliorate social ills (e.g., Snow, 2004), recent work explains how they pressure companies into acting more responsibly (e.g., Davis et al., 2008; Weber, Rao and Thomas, 2009).

Whoever the target, making an actor responsible for an issue involves framing – the 'signification work' to focus attention on an issue, convey one set of meanings over another, and reconstitute the way in which some objects of attention or actors are seen or linked (Snow, 2013). The notion of framing is central to social movements. Snow and Benford (1988) identified three core framing tasks; diagnosis, prognosis, and motivation. Through diagnostic framing, the problematic situation is defined as in need of a remedy and the actors or causes held responsible for the problem are identified. Diagnosis answers the question; 'what is the problem?' and 'who or what is to blame'? Prognostic framing stipulates possible solutions or goals, and the strategies to achieve those goals, i.e., 'what should be done'? Motivational framing is the call to arms to mobilize potential adherents (Snow and Benford, 1988). By pursuing these framing tasks, movement actors attend to mobilizing collective action (Klandermans, 1988) to problematize and challenge 'existing authoritative views and framings of reality' (Snow, 2004, p. 385).

While many studies have tended to focus on the strategic deployment of extant 'master frames' to mobilize support, in Goffman's (1974) view, framing is seen as an interpretive process of meaning construction (Benford, 1997; Cornelissen and Werner, 2014). Framing then is the 'signification work' to focus attention on an issue, convey one set of meanings over another, and reconstitute the way in which some objects of attention or actors are seen or linked (Snow, 2013). To frame is to 'select some aspects of a perceived reality and make them more salient in a communicating text, in such a way as to promote a particular problem definition, causal interpretation, moral evaluation, and/or treatment recommendation for the

item described' (Entman, 1993, p. 52). If actors with divergent frames converge around a shared interpretation, framing can have a 'transformative function' (Snow, 2013) in precipitating shifts in collective understandings – 'frame shifts' (Ansari, Wijen and Gray, 2013). Over time, these collective understandings can gain currency to emerge as robust 'field frames' – broader structures of cultural meaning (Lounsbury, Ventresca and Hirsch, 2003).

While interpretive processes of meaning construction are at the heart of framing, wicked problems complicate 'signification work' and pose at least three major challenges for core framing tasks.

Framing challenges in making companies complicit in a wicked problem

First, wicked problems are complex social problems for which there may be no 'directly-traceable causes' (Gioia, 1992, p. 381). For instance, poverty has been linked to both a lack of income and a deficit in human capabilities (Sen, 1999). This makes it difficult to delimit wicked problems, identify villains, and offer definitive solutions (e.g., Waddock, 2008). Unlike cases, where an offending party and societal harm can be readily linked, such as Union Carbide and the Bhopal disaster in India, many social ills involve 'structural social injustice', where no readily identifiable villain 'automatically comes to the fore' for assigning blame (Bartley and Child, 2014, p. 3). The common 'liability CSR model' for establishing guilt or blame for a societal harm may thus fall short as a guide for assigning responsibility (Schrempf, 2014; Young, 2006).

Second, since stakeholders may differ on the causes of the problem, they are also likely to clash with regards to what constitutes an acceptable solution. Wicked problems cannot be conclusively "solved" as there are no formulas or objective criteria to judge a solution as right or wrong. Solutions are assessed in a social context in which 'many parties are equally equipped, interested, and/or entitled to judge [them]' (Rittel and Webber, 1973, p. 163). An issue like climate change cannot be defined as either an economic, political, social or natural

problem and the field is fraught with disputes about whether it needs market, regulatory, or technological solutions (Ansari et al., 2013). Yet, ambiguity may also make the problem seem like a 'lost cause' (Klandermans, 1988) which may inhibit collective action (Gamson and Meyer, 1996). The challenge then is to define a problem and establish causality in ways that allow targeting a potential villain and offer the hope of a viable solution.

Third, divergent views about a problem's definition, root cause and remedy complicates mobilizing wider support for targeting one particular actor, such as business. Moreover, companies tend to be strategic, unitary actors that can often respond quickly and coherently to stakeholder activism, leveraging a sophisticated arsenal of tools to deflect, evade or resist pressures to make them complicit in a problem (Bundy, Shropshire and Buchholtz, 2013; McDonnell and King, 2013). The challenge then is to find effective ways for mobilizing support in implicating companies and combating counter-mobilization.

These framing challenges make it a formidable task to make companies responsible for wicked problems and motivate our two research questions: How are companies responsibilized for a wicked problem they may not identify with? What is the role of private and public actors in this process?

METHODS

To study responsibilization, we draw on the case of conflict minerals in the Democratic Republic of Congo (DRC). Within a few years, companies across industries – regardless of whether they source minerals from the DRC – became implicated in addressing the country's human rights abuses. We selected this case because the focal issue – conflict and violence – is a wicked problem for which business assumed responsibility alongside the public sector.

Research Context

A catastrophic humanitarian crisis. Despite its immense natural wealth, including the largest reserves of tungsten ore, the DRC was last of the 187 countries listed on the UNDP Human

Development Index in 2012. It is arguably a failed state battling indiscriminate killings, mass rapes, child soldiers, malnourishment and forced labour for resource extraction. After decades of exploitation under colonial and dictatorial regimes, armed conflict and sexual violence have continued to ravage Africa's second-largest country. The ethnic conflict fuelling the 1994 Rwanda genocide spilled over to its Eastern part and contributed to Africa's World War (Trefon, 2011). More than 5.4 million people reportedly died from violence, famine and disease. The war ended in 2006, but conflict continues. Described as the 'rape capital of the world' (Autesserre, 2012), almost 40% of women in the Eastern DRC have suffered sexual violence, contributing to the spread of HIV. The government has failed to manage the crisis, making it a classic case of a 'governance gap'. The DRC has been described 'a vast laboratory where a host of international partners are engaged in experimenting with different state-building alchemies.' However, international donors, UN agencies and NGOs have been seen as largely ineffective in supporting Congolese state-building (Trefon, 2011, p. 703).

New governance approach focusing on conflict minerals. Since mid-2000, attention has shifted to the illegal exploitation of natural resources. The UN Security Council passed resolutions to control illegal mining in 2003 and 2005. When this failed, a new frame emerged on preventing the entry of 'conflict minerals' into the global supply chain, thus implicating companies. This frame is reflected in the conflict minerals amendment to the 2010 Dodd-Frank Act (US). Section 1502 declared gold and the '3Ts' (tin, tantalum and tungsten) to be conflict minerals, whose trade could finance armed groups in DRC and adjoining countries. The ruling does not ban the import of minerals, but mandates US listed companies to annually disclose whether they sourced minerals from conflict zones.

Conflict minerals disclosures allowed NGOs and other stakeholders to monitor corporate behaviour, generating ripples in the business and policy world. Since 2009, numerous public-private partnerships and industry-led initiatives have sought greater transparency in compa-

nies' sourcing practices. A private support infrastructure involving the 'big four' accountancy firms is assisting companies in conducting human rights 'due diligence' in their supply chains. The impact is contested. The Enough Project (2014) reported that by 2014, over 40 percent of the world's 3T and gold smelters have passed third-party conflict-free audits, 112 out of 155 Congolese mines surveyed were declared conflict-free, and 21 global electronics companies, including industry giants Apple and Intel, sourced from conflict-free mines. Others have pointed to job losses among the artisanal mining communities (Open Letter, 2014). In any case, while many have described the Congolese conflict as 'a forgotten war', NGO activism and the US conflict minerals legislation and similar measures afoot in Canada and EU, have put this humanitarian crisis back on the global political – and business – agenda.

Data Collection

We collected publically available documents from 2005 to 2014 related to conflict minerals, including reports, press releases and blogs by human rights NGOs, companies, industry associations, UN documents including Security Council resolutions, official US congressional records and drafts of the evolving legal text. We also collected documents on the implementation of Section 1502 by the US Securities and Exchange Commission (SEC) that engaged in a two year consultation with investors, companies, and NGOs to set disclosure requirements. The process lasted from July 2010 (Dodd Frank Act) to August 2012 (SEC Final Rule). We collected all 525 public comment letters submitted to the SEC, (88 in Phase 1, 07-12/2010; 437 in Phase 2, 12/2010-08/2012) meeting documentations (155 meetings) and the public roundtable transcript in October 2011 (>45,000 words). We conducted 29 semi-structured interviews lasting between 30-180 minutes with respondents from the US government (Gov), NGOs (NGO), gold and electronics industries (I) on conflict minerals.

Data Analysis

Our analytical approach is open ended and inductive (Corbin and Strauss, 2008). First, we created an integrated database and used the qualitative analysis software, Dedoose to develop and refine emerging codes. We developed an event history database (Van de Ven and Poole, 2002). Table 1 provides a timeline of key events.

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Second, we examined what, when and who contributed to responsibilizing business. We analysed documents, interviews and SEC comment letters to identify and categorize stakeholder clusters according to the types of engagement. We sought evidence on if, how, and why actors changed their interpretation of the wicked problem, which we label 'frame shift' (Ansari et al., 2013). We identified five 'frame shifts' (1a, 1b, 1c, 2 and 3) (see Table 2). We used 'temporal bracketing' (Langley 1999) to impose rough temporal phases on data based on key events. Third, we began to consider data and theory in parallel and collapsed first-order codes into constitutive themes. We sought mechanisms underlying frame shifts. Social mechanisms (Weber, 2006), similar to 'process drivers' (Langley, 1999, p. 904), describe explanatory patterns or propensities at an analytical level above description and below universal law (Gross, 2009). Our interest was in identifying transformational mechanisms – how interactions among actors are 'transformed into some kind of collective outcome' (Hedström and Swedberg, 1998, p. 23). We created a label for each mechanism. To illustrate, we identified 'causal linkage' by drawing on the concept of 'causal story' (e.g., Stone, 1989) to explain the creation of plausible causal links between problems and targets. See table 2 for our framework of frame shifts, mechanisms and illustrative data.

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FINDINGS: PRIVATE SECTOR RESPONSIBILITY FOR HUMAN RIGHTS

A field-frame of corporate responsibility for wicked problems

How have companies 'who could barely locate the Congo on the map' become 'part of a constituency for peace in Congo' (NGO$_5$) responsible for mitigating conflict? While the humanitarian crisis in DRC had long been regarded as government responsibility, in less than five years, corporate responsibility has turned towards 'a corner of the world that for a long time nobody was paying attention to' (I$_{14}$). In what activists described as a 'sea-change', flagship electronic brands have pledged their support for the DRC. A senior executive from Apple, which declared its tantalum supply chain as conflict-free in 2014, declared the company's intention to 'truly influence the demand situation and change things' by ending sourcing from mines that were 'unacceptable from a human rights standpoint' (Apple, 2014). Our data suggest an iterative process of creating a new business responsibility frame involving human rights NGOs and enterprising politicians.

Taming the wicked problem through constructing a responsibility frame

Diagnostic and prognostic breakdown: Conflict is intractable. Policy makers and others had viewed the Congolese conflict as 'conceptually difficult to know where to start' (Trefon, 2011, p. 718). The sources of violence were manifold and contested. Think tanks, academics and activists posited several competing explanations for the root cause of violence. These included local land disputes, corruption, failed public institutions, interference from neighbouring Rwanda, ethnic polarities, culture of mistrust, and legacies of wars, pillage and colonial rule (Autesserre, 2012). A Campaigns Manager (NGO$_4$) admitted the failure to diagnose the intractable conflict and noted the 'many failed attempts to communicate this because of the very complex narrative':

> With Congo we were struggling to find that narrative for people to understand what's taking place, something that's so far beyond comprehension, at least in the Western world.

In other conflict zones, such as Sudan, human rights NGOs could identify the 'bad guy committing mass atrocities against innocent civilians...It was very simple for people to understand and therefore become active on' (NGO4). But the convoluted nature of the Congolese situation did not afford a clear narrative that could mobilize international support.

Frame shift 1a: Recasting the wicked problem from intractable to actionable. By 2008, a new framing of the Congolese crisis emerged that reconceptualised it from being intractable to being amenable to intervention. Rather than calling for action on a daunting mesh of inter-related causes and problems, 'conflict minerals' focused attention on one strategic issue; preventing trade in conflict minerals. As a call for action, this frame was perceived as 'easier than saying corruption is the problem, or the justice system doesn't exist. Those are never going to be reformed' (NGO2).

Reducing complexity: Conflict minerals as root cause. The frame shift was enabled by championing a single, tractable root cause of the conflict. Among possible explanations for the crisis in Eastern DRC, NGOs focused on trade in 'conflict minerals' as the root cause (NGO4). Revenues from minerals allegedly financed rebel groups, militias, and criminal networks in the Congolese army, who secured control over mines and trading routes. NGOs that had long campaigned to involve the international community in the crisis recognized that focusing on 'the economic drivers of conflict' was a crude simplification of the Congolese conflict. Privately, some admitted that conflict minerals 'may not be a root cause' and could even mask other causes of the conflict. However, conflict minerals served as a comprehensible frame for Western audiences. A field investigator justified the focus:

> While we cannot grasp everything we said ok, let's focus on this and see how we could break the silence, raising awareness in the USA, especially in target universities, youth, and also international civil society organizations back in Washington. (NGO6)

Narrowing the scope of conflict to trade in minerals allowed actors to reduce complexity and portray the Congolese crisis as being potentially resoluble.

Frame shift 1b: Making companies complicit in a wicked problem. Till late in 2008, calls

for action were directed at governments and the international community 'to create peace and

stability' through 'supporting and training the Congolese army', 'rebuilding eastern Congo's

collapsing infrastructure' and 'institution-building' (Enough, 2007). 'It wasn't viewed as a

company problem', as a respondent (I_{14}) noted. But from 2008 onwards, NGOs started to ar-

gue that 'the best place to start was not with the Congolese government but with US compa-

nies' (NGO_7). An industry lobbyist described the shift:

> Up until the end of 2008 it's a government problem. [US] State Department isn't doing
> enough, the UN isn't doing enough, EU isn't doing enough; all these groups need to do
> more. And suddenly…a new idea was taken up that this was a supply chain problem. (I_{14})

She argued that 'NGOs thought of dragging companies into this because, perhaps, they would

be more responsive than governments have been'.

Devising a narrative to link conflict and companies. Implicating a new actor; downstream

companies in the global minerals supply chain, was made possible by theorizing trade in

minerals as fuelling armed conflict. While campaign groups 'didn't initially start out saying

we want to do something about conflict minerals and corporate social responsibility' (NGO_9),

they carved out a 'causal story' (Stone, 1989) that connected conflict to end-user sourcing of

minerals. Notably, the NGO, Enough Project changed its strategy to put pressure on 'actors

who have leverage' at the top of the minerals supply chain – brand name electronics compa-

nies. End-user companies that typically used minimal amounts of minerals (that may not have

even been mined in DRC) were clearly not the most culpable actor. However, by focusing on

chains of influence in the global supply chain, NGOs argued that 'actors who have the high-

est potential for influence are those who have the buying power' (NGO_7). Focusing on min-

eral sourcing rendered the intractable conflict in DRC into a problem that could be addressed

by companies through change in their sourcing policies.

Frame shift 1c: Shifting the crisis from back-of-the mind to front-of-the-mind issue. To enlist broader support, human rights groups constructed an emotional connection between the Congolese crisis and target audiences to move the crisis from a 'back-of-the mind' issue to a 'front-of-the-mind' issue (Giddens, 2009). While conflict minerals provided a plausible explanation for the conflict, it was still remote to consumers and end-user companies: 'It wasn't on anyone's radar' a manager explained (I_2). The challenge was to compellingly connect Western audiences with conflict in DRC.

> *Invoking sexual violence as a trademark tactic and connecting it to mobile phones.* To make the issue salient, NGOs stoked moral outrage by crafting a link between sexual violence – an emotionally laden issue – and consumer electronics. Respondents reported that this connection 'proved to be that missing link that got people interested in the crisis in Congo' (NGO_6). While the humanitarian crisis had many facets, human rights activists tactically singled out sexual violence against vulnerable women to draw attention to this single category of victims. This was seen to arouse more emotional support than other victims, such as child soldiers, who could become the future perpetrators of violence. Sexual violence became 'I guess, a trademark tactic', a campaigner (NGO_4) noted and was portrayed as 'a hallmark trait of the conflict' to 'create outrage' (NGO_7) among Western audiences. It gained high profile attention when US Secretary of State Hillary Clinton visited Congo in 2009.

In the same year the Enough Project launched a campaign; 'Raise Hope for Congo', that linked 'Cell Phones, Conflict Minerals, and the Worst Sexual Violence in the World'. The aim was to create a 'public demand for conflict-free cell phones […] so that the industry would respond to that market'. While conflict minerals were also used in aerospace, or jewellery, Enough's strategy targeted consumer electronics companies for their potential to 'connect with the public' and 'provoke a public response':

> We saw it as an entry point to galvanize a movement. We knew that our support base of supporters were an American public who very readily *connect* with their electronics brands. (NGO_4)

The connection with mobile phones was seen as 'a Godsend in terms of advocacy' (NGO_9) to bring sexual violence close to Western audiences, as a campaigner noted:

> In the US, or Europe or in places where people don't really feel connected to the Congo, they're now able to draw the connection. Because they're like 'oh, hey, my cell phone is connected'. (NGO_3)

But respondents also admitted that the link was purposefully created:

> Neither conflict minerals nor sexual violence fully defines what's happening in Congo but these things that can attract attention from far away. But I don't have illusions that the average person on the street in the US is ever going to understand the complexity of it, so I'd rather have them feel, you know, *connected* in some way. (NGO$_6$)

A simplified narrative 'stripped down' the complexity of the conflict. The new causal story emphasized one main group of victims (sexual abused women), one key cause (armed groups illegally exploiting Congo's mineral wealth), and one key solution (foreign companies restricting the use of conflict minerals in their products).

Company resistance to the responsibility frame. Companies initially refuted the idea that conflict was a private sector issue. They felt unduly 'cast responsible' for 'a political conflict' (I$_4$). 'At the end of the day corporations don't start a conflict. Governments do' (I$_8$).

> To expect that companies can fix failed governance alone, simply by sending an economic signal, is fundamentally mistaken. Most of the challenges in the DRC are outside normal business responsibility. (I$_{13}$)

> Companies used three strategies to resist responsibility. First, they claimed the complexity of global supply chains made it impossible to trace their mineral sources. The 'most common response from companies' was to mock the feasibility of tracing minerals:

> They almost laughed in our face at the thought that we would even ask. They said that, "you know, we have 4,000 first tier suppliers. Those suppliers have suppliers. Do you know how many companies you're talking about?" (NGO$_4$)

Second, companies disputed the idea that trade in conflict minerals was the root cause. For many, this seemed 'a bit of a made up problem' (I$_{14}$) to detract from a failed government:

> The bad news is it's a bit of a red herring. They have everybody focused on the minerals trade which is not the root of the problem and even if addressed is not going to solve the problems. (I$_{14}$)

Third, companies claimed it was too costly and futile. Most companies saw themselves as 'far removed from the source' of conflict minerals and were reluctant to invest their resources in 'tracking lots of [minerals] that has no relationship at all to the Congo' (I$_{12}$). Given that most Congolese minerals were smuggled out of the country and exported to non-Western markets

(e.g., China), Western companies 'felt that their influence was minimal' (NGO$_5$). They rejected the idea that companies could solve a problem where governments had failed.

Solidifying the responsibility frame: A catalytic legislation

Frame shift 2: Shift from denying responsibility to accepting responsibility. Although initially reluctant to accept responsibility for the Congolese crisis, we report major developments that led many companies to shift their initial position on the issue.

    A mutually empowering collaboration between NGOs and government. NGOs reported that 'they thought it would be a small campaign that never saw the light of day' (NGO$_2$). But their campaigns to implicate companies paralleled the efforts of a small bipartisan coalition of US legislators mobilized by the media coverage NGOs had generated against the use of rape as a weapon of war. Modelled on the Kimberley Process to prevent the import of 'blood diamonds', in 2008 US legislators had initially proposed an import ban on conflict minerals aimed at 'getting the money out of the conflict'. While this bill was resisted by industry and died in Congress, it spurred renewed NGO efforts. In a mutually empowering coalition, NGOs provided an emotionally-laden narrative that added moral urgency to legislative intervention. While initially named as *one* of the issues, the 2009 bill singled out 'widespread sexual violence and rape that continue at an alarming rate' (Cong. Rec., 2010). The goal was to 'save women' by 'breaking up a multibillion dollar black market' (Gov$_1$). Senator Durbin, co-initiator of the legislation recalled his first encounter with abused women:

> I wasn't prepared for what I found at Goma [city in Eastern Congo]. Imagine, one of the poorest places on earth…Look at the roadside and find women by the dozens sitting in the dust praying that they'll get a chance to get into that hospital for a surgery they need [due to gang rape injuries]. Looking into their desperate faces as they're waiting for help and imagining what they have seen, what they have been through…is something you're not likely to forget. It's a war where, sadly, rape is a major weapon. (SEC, 2011)

The industry strongly lobbied against the bills in Congress and Senate, 'trying to find the weakest bill that they could defeat…just make it go away' (Gov$_2$). NGOs countered by using

moral shock for the 'micro targeting of members of Congress, trying to get some pressure on them from constituents to...be supportive or allow it [the bill] to go through' (NGO$_4$).

Despite these efforts, 'it never moved anywhere', as Congressman McDermott (sponsored of the bill) recalled. A drafter of the legislation remembered stiff industry opposition.

> This is hardball. I mean, this is serious money and this is about liabilities, this is about access to resources. There's competitive advantage for being able to buy minerals below what would otherwise be the world market price…it was rough. (Gov$_1$)

Notwithstanding 'failures' in getting these bills passed, by late 2009, a powerful network had emerged among bipartisan policy makers in the US Congress and NGO activists that was eager to hold companies accountable for their mineral sourcing.

'Sliding in' a conflict minerals provision in the Dodd Frank Act. Skilled legislators leveraged an opportunity to create a 'ground-breaking legislation' (Gov$_1$). This opportunity emerged during the finalizing of the Dodd-Frank Act in May 2010 – the US government's response to the financial crisis. 'Slipped in' as an amendment to the main Act, Dodd-Frank conferees unanimously adopted the conflict minerals amendment Section 1502 (out of 1504 sections). Once it was signed into law in July 2010, NGOs reported how 'all of a sudden the tide had turned'. Companies, initially reluctant to engage, now 'saw the writing on the wall'. The conflict minerals provision 'really kicked everything into high gear' (NGO$_3$). A respondent noted: 'I'm not exaggerating, it was like the day after Dodd Frank was passed people started calling us up' (NGO$_9$). After being ignored for years, he recalled being invited to Silicon Valley to meet with the CEO of an electronics firm: 'He was saying: 'you guys are the f***ing geniuses…hey what do you guys want us to do so?''

But in practice, industry respondents admitted that they were 'looking at the path of least resistance and the easiest way they could comply with the regulation' (I$_4$). Companies might simply 'say that 100% of all of these minerals *is* from a conflict zone' (I$_2$). A respondent from an industry association explained why '99% of that marketplace doesn't care':

A manufacturer like Boeing who has about 107,000 different suppliers for parts that go into their aircraft don't really care if the bonding wire is conflict free, full of conflict, or kind of conflict! And it's not a branding thing at all for them. […] And if you don't want to fly on Boeing aircrafts then good luck to you! (I_2)

Privately, many companies were 'angry' or 'caught by surprise' at being implicated in the issue of conflict minerals (I_6). For instance, Kraft Foods/Mondelez (SEC, 2011) noted that they 'were surprised that the disclosure requirements would apply to them' because of the tin used in their packaging for biscuits. Nevertheless, companies reluctantly realized that 'legislation has come out of the pipeline, you have no choice but to be proactive' (I_3) and began to change their stance from resistance to acquiescence.

Naming & shaming companies and requiring them to 'know & show'. When the legislation for mandatory disclosure was imminent, NGOs had already begun to link individual companies to conflict minerals, potentially tarnishing their reputation through 'naming and shaming' offenders. For example, The Enough Project's company rankings – a traffic light system (green, yellow, red) – ranked the best and worst performing companies. The conflict minerals provision then required companies to 'know and show' the use of minerals from conflict zones. 'It doesn't even say you can't use conflict minerals. It doesn't ban conflict minerals. It just says 'you have to tell us if you do' (Gov_1). This empowered NGOs and private investors to monitor company behaviours. A staffer (Gov_1) explained: Mandatory disclosure provided a 'big tool for NGOs, but you have to do the enforcement' given the large volume of reports annually filed with the SEC. A respondent noted:

It is about the 'naming and shaming' of the companies. You know the SEC doesn't do that. So it is going to take some kind of watchdog organizations, hopefully not just us, that will comb through these reports, find where companies had to report on this section and you know, actually hold them accountable for that. (NGO_5)

NGOs therefore emphasized that '[t]he job is not finished' (Enough, 2012) as they would become part of law enforcement by taking up the role of 'vigilantes' or 'behavioural police' (Gov_1). Conflict minerals reporting provided a monitoring tool and induced social judgements about corporate behaviours.

Making conflict minerals disclosures 'matter'. To facilitate the sanctioning of business for false or misleading information, conflict minerals disclosure was, eventually, given the status of 'material' information. While Section 1502 stated that issuers had to 'submit' conflict minerals reports, the SEC had to decide whether 'submit' meant 'filing' or merely 'furnishing' reports. Filing made information 'material' to shareholder value as incorrect filings could make companies liable under the SEC 1934 Act for 'false or misleading statements' affecting shareholder value. Opponents, mostly firms, advocated 'furnishing' – reducing companies' liability – on grounds that human rights oriented goals of Section 1502 were inconsistent with the disclosure of material information for investors. In letters to the SEC (28/2/2011; 16/2/2012), sponsors of the original bills advocated the more stringent 'filing' that received strong support from NGOs and investors. A portfolio manager explained why this additional disclosure was 'of deep material interest to investors':

> We believe that sourcing of minerals from conflict zones exposes issuers and their shareholders to reputational, regulatory, litigation and operational risks. Therefore, a high level of disclosure will provide better protection for investors. (in SEC, 2011)

In its final rule, the SEC increased the scope of liability to 'file'. Section 1502 files would thus have the same liability implications as 'material' financial disclosures.

Corporate Political Engagement

Frame shift 3: Companies shift from reactive to active engagement. By 2012, a sizeable number of companies began to change their strategy from going the 'path of least resistance' (I_2) and pursuing a risk-avoidance strategy to actively engaging with the problem of sourcing conflict minerals. This was a critical shift because, initially, a few companies had decided to simply pull out of the country to avoid the 'administrative burden and cost' of sourcing minerals from DRC. Critics argued that this 'unintended consequence' constituted a 'de facto boycott' (I_2) and 'pushed more artisanal mining into the hands of warlords' (I_8). However, instead of avoiding Congolese minerals, an increasing number of companies became active par-

ticipants in reforming the minerals trade. A supply chain manager from a leading US-based electronics company noted that 'it's important for us to do everything within our power to try to break the link between minerals and armed groups.' (I_{13}). Companies still did not see themselves as the cause of the Congolese crisis, but accepted that they could play a positive role in preventing it: 'It is a situation of failed governance, but we, as companies can send an economic signal…rewarding responsible companies and practices' (I_{13}). Similarly, a Philips position paper (2014) stated that, 'we could use our leverage over the supply chain to help address the conflict and get engaged'. This was a significant leap in the position of prominent industry players; from initially denying or even ridiculing the link with the crisis to accepting that "the link between modern manufacturing and human suffering is so direct', a spokesperson for Motorola Solution for Hope (2012) noted. An NGO respondent confirmed that 'the discourse definitely has shifted' (NGO_5). But how did this shift emerge?

Stimulating multi-stakeholder dialogue on conflict minerals. SEC's two year stakeholder consultation process played a key role in translating Section 1502 into a final reporting rule. Companies, industry associations, and civil society actors were invited to submit comment letters and voice their concerns in private and public meetings. SEC's comments microsite provided a discursive forum for affected stakeholders to publicly debate the issue. A participant (NGO_5) summed up key debates. 'Should mining companies report? Should gold be treated differently? Should retailers have to report?' (see also SEC, 2012). Despite stark differences between 'human rights activists really wanting a very high bar' and 'industry associations who wanted a really low bar' (NGO_5), campaigners described the final outcome as a fair reflection of different stakeholder positions on the ruling:

> We were 50% pleased with everything that came out, which, maybe, is fair. You know, we were the extreme underdog battling against corporate interests, and maybe getting 50% of what we wanted and hoped for was a huge victory. (NGO_4)

As participants of a public dialogue, companies could not deny the moral imperative of protecting human rights. In their comment letters to the SEC (2011), AMD lauded 'the intent behind this legislation', and AngloGold Ashanti and Boeing 'endorsed congressional action'. The opportunity to shape the regulation also motivated companies to engage with the issue and partner with NGOs. Getting high-level corporate invitations 'started to happen fairly frequently' (NGO$_9$). Networks emerged, such as the 'Multi-Stakeholder Group' involving companies, NGOs and socially responsible investors 'to arrive at a series of consensus principles to guide the development of the regulation' (NGO$_5$). Even when some industry lobby groups challenged the conflict minerals rule in 2013, the group's members, including Dell, GE, HP, Intel, Microsoft, Motorola and Philips pledged 'to work together to eliminate the link between violence and human rights abuses and the mineral trade in the DRC…regardless of the lawsuit.' Such joint positions were hailed as the emergence of a 'common voice' and could be 'marketed' to policy makers as multi-party agreements.

By becoming participants in the regulatory initiatives, many companies began to position themselves as industry leaders. In their SEC comment letters, companies declared their intentions to not only 'fully comply' with the rules, but also create an infrastructure for conflict-free sourcing, such as the Conflict-Free Tin Initiative or Motorola's Solutions for Hope (see Table 2). 'Part of it is not just funding projects but also facilitating on the policy side, having discussions with the various in-region actors and facilitating alignment', as a supply chain manager reported (I$_{15}$). Moreover, some managers became 'allies within companies' who made 'impassionate pleas' to 'drive internal change' in company policy (NGO$_4$). An electronics company executive (I$_{13}$) noted: 'You need everyone at the table…We all came together to try to support programs in the area'. Through participating in multi-stakeholder public dialogue, industry leaders began to embrace the premise of business's responsibility for a wicked problem and progressed towards becoming political actors.

A MODEL OF CORPORATE POLITICAL RESPONSIBILIZATION

Looking across these observations, we explain how a 'field frame' of private responsibility for a wicked problem can emerge through five interrelated frame shifts. Figure 1 presents our theoretical model of the process of corporate responsibilization for a wicked problem.

---------------------Insert figure 1 about here---------------------

1. Construction of a responsibility frame

Core framing tasks – diagnosis, prognosis, and mobilization – are complicated by the scale and complexity of wicked problems. Constructing a plausible responsibility frame for business involves three frame shifts; 1a, 1b and 1c, which allow a plausible diagnosis of the problem, offer a viable private sector solution and mobilize a broader audience by making the issue emotionally resonant. We identified three mechanisms driving these frame shifts.

Mechanism 1a: Cognitive shortcuts. A cognitive shortcut is created by taming or breaking down a multi-faceted wicked problem into sub-problems from which a single or a few 'points of leverage' with plausible links to the target are handpicked. This makes the problem appear surmountable and allows a diagnosis. As humans tend to be 'cognitive misers' creating a cognitive shortcut can create the impression of having more control over addressing an issue (Fiske and Taylor, 1991; Simon, 1957). Reducing a problem's scope can make it 'perceptually bounded' (Goffman, 1974, p. 274), appear amenable to intervention (Stone, 1989) and provide hopeful anticipation of a solution. As the enormity and multi-scalar nature of wicked problems are difficult to fathom in all their complexity, confronting them in their totality may breed a 'sense of fatalism' (Snow and Benford, 1988, p, 203). In our case, trade in conflict minerals, and sexual violence were focalized over other issues, such as corruption, that provided a point of leverage for targeting companies. Narrowing the scope of a wicked problem may not necessarily bode well for solving the problem, and may even lead to adverse effects. For example, focalizing child labor may mask other poverty related issues

(Khan, Munir and Willmott, 2007). However, narrowing a wicked problem's scope can reduce fatalism, make the problem appear tractable, and spur action by providing hope for a possible resolution.

Mechanism 1b: Causal linkage. As a plausible prognosis needs a credible target, a wicked problem needs to be causally linked to actors potentially able to provide a solution. As wicked problems tend to have global scope, multinational companies are attractive targets because their sphere of influence transcends sovereign jurisdictions. However, as a wicked problem may have multiple villains, the idea of singling out companies may seem far-fetched under a standard 'liability CSR model' (Young, 2006), where responsibility is assigned to an obvious wrongdoer, such as BP and the Gulf of Mexico oil spill. In contrast, the 'social connection model' (Young, 2006) posits that remedying global injustices is potentially everyone's responsibility 'by virtue of the social processes that connect people' (Young, 2006, p. 102; Schrempf, 2014). Activists can use this 'commons logic' – collective complicity in a wicked problem (Ansari et al., 2013) – to construct causality and link private actors to a problem, even if they are not the main culprit (cf., Lange and Washburn, 2012). Symbols, stories and metaphors are all weapons in the 'armamentarium' for creating creative causal links (Stone, 1989, p. 156; Polletta et al., 2011). Thus, even if not evident a priori, the link between a problem and target can be crafted through building new causal linkages.

Mechanism 1c: Emotional connectivity. This mechanism can enable the mobilization of wider support for the issue by making it emotionally moving and immediate in the course of people's daily lives. Wicked problems such as climate change are often 'back-of-the-mind' issues with which people do not identify in their everyday experiences (Giddens, 2009). To make them salient 'front-of-the-mind' issues, activists seek to turn them into a 'hot cause' that arouses empathy, guilt and righteous anger (Rao, 2008) and 'puts fire in the belly and iron in the soul' (Gamson, 1992, p. 32). At times, orchestrating and strategically deploying

'moral shock' can be more effective than logical arguments to spur support for a cause (Jasper, 2011; Scheff, 1997). For example, the emotionally imbued image of a polar bear as the iconic symbol of a melting Arctic can arouse support for combating climate change alongside scientific evidence. In our case, NGO activists focalized sexual violence that is known to stoke visceral discomfort over other more morally ambiguous issues such as child soldiers who could be both victims and perpetrators of violence. To connect it with consumers, activists linked sexual violence with mobile phones that many consumers view as part of their 'extended selves' (Belk, 1988). 'Experiential commensurability' through 'framings congruent or resonant with the personal, everyday experiences of the targets of mobilization' (Benford and Snow, 2000, p. 621) makes a link resound with mobilization targets. Creating emotional connectivity mobilizes support by making a link appear more immediate, salient and potent.

2. Solidification of the Responsibility Frame

As companies may resist attempts at being made complicit in a wicked problem, this shift is about obliging companies to accept the responsibility frame. We identified inducing social judgements through public exposure and self-disclosure as key underlying mechanisms. What Schneiberg and Bartley (2008) call 'regulation by information', public exposure and self-disclosure shift enforcement and sanctioning tasks onto consumers, investors and activists. Grounded in a 'logic of consequences' and cost-benefit calculations (March and Olsen, 1998), these mechanisms can solidify a frame by making it financially consequential.

Mechanisms 2a: Inducing social judgements through third-party exposure. The responsibility frame can be solidified through inducing approbatory or disapprobatory social judgements (Bitektine, 2011; Tost, 2011) on the social performance of target companies through third-party exposure. These judgements can affect a firm's financial wellbeing as shaming can potentially alter its legitimacy, reputation, and risk profile (Vasi and King, 2008). Both shame and praise are powerful emotions for influencing behaviours (Bartley and Child, 2014;

Creed et al., 2014). Being put under the spotlight can induce transgressors into conforming to societal expectations to 'look good' on the 'front stage' and present an 'idealized' version of socially sanctioned behaviours (Goffman, 1959). Positive public appraisal may also motivate behaviour through generating competitive dynamics for differentiation. In our case, NGOs company rankings – green, yellow and red – both 'named and shamed' laggards and lauded leaders to motivate progress on the issue. While social judgements may involve episodic events of shaming such as after a crisis, the awareness of being potentially under the gaze, deemed shameful or praiseworthy, can have 'disciplinary power' on behaviours (Creed et al., 2014). Both the fear of public shame and the desirability of public praise may pressure companies into reforming behaviours and reinforce the responsibility frame.

Mechanism 2b: Inducing social judgements through self-disclosure. This mechanism can strengthen the responsibility frame by inducing social judgements about companies through corporate self-disclosure. Rather than depending only on external parties to expose and compare differential performance, the 'burden of proof' is shifted onto companies by making them responsible for 'knowing and showing' their social performance. Like external exposure, self-reporting brings performance to the 'front stage' (Goffman, 1959) and can yield socially desirable behaviours that companies would like to publicly reveal. But rather than making companies respond only to episodic exposures made by external evaluators, periodic self-reporting on social performance is may require companies to integrate human rights concerns routinely and more systematically into their operational procedures.

The degree to which self-reporting affects corporate behaviour is likely to depend on the status of the information (material or non-material) and potential liability implications (voluntary or mandatory). Recently there have been efforts to 'elevate' non-financial disclosures to the status of 'material' information to investors, such as 'integrated reporting' on environmental, social and corporate governance (ESG) (Eccles and Serafeim, 2013). If information is

deemed material, financial regulators are more likely to make disclosures mandatory. In our case, the argument that conflict minerals use by companies was 'material' information persuaded the SEC to mandate the more stringent 'filing' rather than 'furnishing' the disclosure report.

While our case showed involved state mandated disclosures, voluntary initiatives can also create disclosure norms, such as Ruggie's human rights due diligence framework (Ruggie, 2014), carbon disclosures and sustainability reports. While these disclosures may be skewed towards better performing companies (those without a positive story may not disclose) and less enforceable than mandatory disclosures, they can nevertheless lead to social sanctions for non-disclosure. Thus inducing social judgements can render the responsibility frame consequential and thereby solidify it.

3. Corporate adoption of the responsibility frame: Assuming a political role

The third frame shift involves companies going beyond simply complying towards actively engaging with the wicked problem and *co-authoring* the responsibility frame.

Mechanism 3: Deliberative integration. As against the consequentialist logic, engaging companies in a deliberative process of public will formation is based on the 'logic of appropriateness' – rooted in identity and norms (March and Olsen, 1998) – that can enhance and sustain companies' commitment to a problem. Practices of justification during deliberative interactions can enable actors to transcend their narrow 'provinciality' (Habermas, 2003; Scherer and Palazzo, 2007) through the 'civilizing effects' of public deliberation (Elster, 1998). In our case, the SEC's consultation process provided a 'discursive space' – 'a forum for a range of different actors affected by and interested in the subject of the inquiry' – to deliberate on issues of consequence (Hardy and Maguire, 2010, p. 1384). By participating in this dialogue, some companies revised their position from hostile resistance, or passive acquiescence to active engagement with the wicked problem. In a public forum,

participants are known to engage in 'moral reasoning' (Scherer et al., 2013) to make their arguments seem legitimate and morally valid. In our case, the public consultation process led corporations to publicly acknowledge responsibility for the crisis, even if privately they might have held different views. It was difficult for companies to publicly dispute the morally unambiguous principle of mitigating human suffering in a region devastated by death and destruction. Public deliberation may thus lead to 'argumentative self-entrapment' (Risse, 1999), where companies become bound by their public commitments. Even if only rhetorical at first, 'talking the talk' can compel companies into addressing inconsistencies between what they say and do (Haack, Schoeneborn and Wickert, 2012). While companies may initially participate for strategic reasons to influence emerging norms, taking ownership can increase their commitment. Through deliberative integration, business can assume a political role by becoming *co-authors* of the responsibility frame.

While these interrelated frame shifts can occur concurrently or in succession, their enactment, over time, can enable the emergence of a 'field frame' to make companies responsible for a wicked problem. While 'malleable' (Lounsbury et al., 2003) and subject to erosion, ongoing effort to sustain the field frame can make it more durable. Corporate responsibilization is an ongoing process where multiple stakeholders negotiate the boundaries between private and public responsibilities.

DISCUSSION

Societies face daunting wicked problems; poverty, obesity, corruption, civil unrest, climate change, bio-diversity loss, and water insecurity that involve collective action dilemmas in the absence of a clear, single culprit. To understand the process through which companies may assume responsibility for wicked problems, we document how a 'field frame' of corporate responsibility emerged. While bringing companies into the fray of social ills has long attracted scholarly attention (e.g., Carroll, 1999), it is less clear why some problems have entered the

private domain (e.g., human rights), while others have not (e.g., tax enforcement). We explain the social construction of private responsibility; how linking systemic problems to particular actors is neither natural nor inevitable but an ongoing social accomplishment. Social problems and those responsible do not exist in any objective sense but rather are 'named' as a result of collective practices (Blumer, 1971). Consequently, categorical distinctions (such as public/private, collective/individual and human/non-human responsibility) are historically and socially negotiated.

Contributions

We make three contributions to literatures on political CSR and social movements. First, we present a process model explaining how private actors can be made responsible for wicked problems. We explain how this requires several frame shifts that can change interpretations of responsibility and lead to the emergence of a new 'field frame' of responsibility (Lounsbury et al., 2003). While social movement scholarship has focused on 'contentious performance' and 'extra-institutional' tactics against target companies (King, 2008; Tilly, 2008) to induce them into adopting socially responsible behaviours, we highlight its interplay with non-confrontational means such as deliberative dialogue (Scherer and Palazzo, 2007). Our model thus bridges insights from contentious performance and deliberative democracy to explain how both the logics of consequences and appropriateness (March and Olsen, 1998) may be at play in responsibilizing companies.

Second, while political CSR scholars have explained the shift of state regulatory functions to private entities (Scherer and Palazzo, 2011), less attention has been paid to the changing role of the state and the shifting boundaries between public and private responsibilities (Davis et al., 2008). A globalized environment has often been linked to a loss of state power in transnational governance (Djelic and Sahlin-Andersson, 2006), where the state has shifted from being interventionist – a coercive actor regulating from above (e.g., embargoes) to de-

volutionary – creating markets (e.g., carbon trading) or outsourcing governance (e.g., private standards organizations). Our findings suggest a meta-regulatory *catalytic* role for the state in enabling hybrid governance (Osborne, 1993). This involves pooling complementary capabilities of business, state and civil society actors, and leveraging webs of entwinement in a globalized environment to shift the burden of a wicked problem onto companies within and even beyond sovereign state control.

Third, we extend social movement theory by explaining how the process of responsibilization involves a complex interplay between framing processes – diagnosis, prognosis and mobilization. Prior studies on social movements have focused on instances where the relationship between the problem and culprit is relatively clear (Bakker et al., 2013; den Hond and de Bakker, 2007); activists identify a social problem, target offenders, leverage master frames, such as the injustice frame to mobilize wider support and induce them to concede to a more socially responsible agenda. We explain how the core framing tasks are recursive; a problem and its root cause can be strategically moulded in a way that allows *prospectively* forging a new causal linkage between a problem and a potential target for its solution, where, a priori, there is no clear link between the two, and how wider support can be mobilized for this emergent frame.

While earlier studies highlighted the 'affective dimension of collective behavior' (Snow and Oliver, 1995, p. 589), more attention is devoted to incentives and rational calculations (Gould, 2013) and how frames logically persuade audiences rather than emotionally galvanise them (Benford, 1997). We showed the role of the emotional valence of causal narratives and how 'feeling and thinking are parallel, interacting processes' (Jasper, 2011, p. 286). Both *positive* emotions, such as those linked with the desire for social approval and improving lives, and *negative* emotions, such as those stoked by shame and human suffering can energize action by acting as 'moral batteries' (Jasper, 2011).

Implications for research on political CSR and social movements

   Insights from the corporate responsibilization model. Cases are opportunities for refining our previous understandings of a phenomenon, and by so doing provide 'heuristic generalizations' (Tsoukas, 2009) and conceptual insights (Siggelkow, 2007). Mechanisms are useful 'toolkits' for seeing beyond the surface-level description of a particular phenomenon and for theorizing new connections in the phenomenon of interest (Weber, 2006). We concatenated mechanisms into a general model about the process of corporate responsibilization, which may hold in a number of settings. While we used an extreme case of a humanitarian crisis and state failure in DRC, the problem of human rights abuse and state fragility is not only wicked but also widespread. The Failed States Index (FFP, 2013) lists 126 of 178 states as either critical, in danger, or borderline cases of state failure. Given that much global production has shifted to these extreme contexts, regulatory voids are an issue that confronts numerous organizations. There is growing recognition that businesses have a responsibility to 'make sure that they are not complicit in human rights abuses', as demanded by the United Nations Global Compact (Rasche, 2009). UN's Ruggie framework (2011, p. 14) outlines that businesses should 'seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts.' Yet critically, what *directly linked*, *contributing to*, or being *complicit in* means is not objectively given but contingent on collective interpretations. Our model elucidates the framing processes through which such causal linkages between business and human rights abuse are created, and then solidified and integrated. While some have questioned the relationship between minerals and conflict in DRC and pointed to the unintended consequences of this frame (Open Letter, 2014), it has nevertheless gained widespread recognition. Regardless of whether this new link to address a wicked problem has worked or not, our theorization highlights how causality can be purposefully constructed.

First, the causal linkage between wicked problems and particular targets is not given but the result of collective framing processes. While many businesses initially found the idea of bearing responsibility for workers' conditions in faraway suppliers' factories absurd, the now accepted 'sweat shop' frame was collectively constructed through years of high profile protests and stoking of moral outrage to link emotive images of workers toiling in sweatshops to produce branded goods enjoyed by affluent consumers (Young, 2006). Consider the alleged modern-day slavery in building infrastructure for the 2022 Football World Cup in Qatar. While the abuse of foreign workers can be attributed to many root causes – home country poverty and inadequate local legislation – the problem would need to be framed in a way that makes it amenable to private sector intervention, such as by linking it to Western sponsors of the games.

Second, our model can explain how the interplay between contentious politics and deliberative engagement can lead companies into assuming a political role. Social movement scholars emphasize contentious tactics like boycotts to challenge their target's reputation (e.g., King, 2008) while political CSR scholars emphasize deliberative engagement (e.g., Scherer and Palazzo, 2007). Both approaches seek 'frame shifting' (Werner and Cornelissen, 2014) and 'frame transformation' (Benford and Snow, 2000) to reform corporate behaviours even if the means differ. Firms may not readily attend to a social problem unless pressured by activists (den Hond and de Bakker, 2007). Conversely, confrontational tactics may make firms defensive and evoke mistrust, denial or symbolic response (Bartley and Child, 2014). For example, IKEA initially reacted defensively to the negative publicity surrounding the use of child labour in the factories of its South Asian carpet suppliers. However, when it emerged that simply eliminating child labour could adversely affect children's welfare, the Swedish retailer began to assume a more political role in addressing the wicked problem (Bartlett, Dessain and Sjoman, 2006). The logic of appropriateness and the logic of consequences are

thus not dichotomous variables but intertwined (Goldmann, 2005) in constructing and sustaining the responsibility frame. It is worth studying the dynamic interplay among different approaches to understand responsibilization in global environments.

Bringing the state back in. By emphasizing the role of private actors, political CSR scholars have paid less attention to the role of the state in private regulation. We find that the state can play a *catalytic* role by creating enabling conditions for private governance. By catalytic we mean that the state does not dictate nor enforce behaviour, but can enable, entice and legitimize private governance. Entrepreneurial governments 'steer more than they row' and can act as 'catalysts leveraging private-sector actions to solve problems' (Osborne 1993, p. 2). As a catalytic actor, the state is less involved in 'first-order' governing to solve problems directly. Instead, its meta-governing can catalyse private governance (Kooiman, 2000, p. 154).

We suggest that political CSR is not simply about a shift from 'government' to 'governance' or from 'hard regulation' to 'soft regulation' (e.g. Locke, 2013). Instead, it pertains to a holistic process of 'experimentalist governance' (Sabel and Zeitlin, 2012) involving both public and private actors with a *shifting* rather than a *shrinking* role of the government. Our case revealed how public and civil society actors played complementary roles in novel forms of governance – tripartite 'responsive regulation' (Ayres and Braithwaite, 1992) and polycentric regimes (e.g., Bartley, 2007; Selsky and Parker, 2005) – in the emerging regulation mix. In a hybrid arrangement, the state did not ban the import of conflict minerals but instead mandated self-reporting that empowered civil society actors to hold corporations accountable. This illustrates a complementary 'division of labor' between private and public roles (Rasche et al., 2013). The state has regulatory power but also relies on non-state actors; businesses have economic power and transnational reach to effect change while civil society have moral authority to evaluate business behaviour. Indeed, private regulation is often 'intertwined with legal standards of responsibility' (Bartley, 2005, p. 233). However, for transnational issues,

the state lacks authoritative control beyond its borders and needs alternative strategies such as 'orchestration' (e.g., the Global Reporting Initiative as de facto international standard) to enrol intermediaries into sanctioning defecting firms (Abbott and Snidal, 2013). How these hybrid governance forms emerge and stabilize and the evolving role of the state in these arrangements deserves more attention.

For social movements scholars, the evolving relationship between private and public actors raises questions about the categorical distinctions between anti-corporate and anti-state social movements (e.g., King, 2008). In many cases of anti-corporate activism, the state is 'involved in some capacity, whether as an additional target, an earlier target, or as intermediary target used to exert leverage over corporations' (Soule, 2012, p. 265). Our findings about how activists and the state *conjointly* devolved responsibility to companies suggest further investigation of the blurring boundaries between anti-state and anti-corporate activism.

Limitations, boundary conditions and future research avenues

While we offer one plausible account of responsibilization, it is worth considering alternative explanations. The legislation – mandatory disclosures – alone may have induced companies into taking responsibility for the wicked problem. While we cannot rule this out, this is less likely for three reasons. First, the state may not have legislated without the conflict mineral narrative that had emerged. Second, disclosures would be less consequential without vigilant external parties scrutinizing them. Third, to avoid the consequences of negative social judgments, companies could react defensively and simply stop sourcing conflict minerals – often a fraction of their supply needs – from DRC. Instead, many companies participated in business-led initiatives for problem mitigation. While companies may initially engage in deliberation for strategic reasons, our data suggest that companies may become 'morally entrapped' during public deliberations and want to be (at least) seen to be addressing the prob-

lem. In transnational arenas, where the state's remit is limited, responsibilizing companies may require the interplay among different mechanisms involving multiple actors.

Our case preserves certain particularities, which were necessary for heuristic generalization, yet render theorization 'open-ended' to generate further refinements from other cases (Tsoukas, 2009, p. 295). *First*, the process of responsibilization may vary across geographic contexts that may have different degrees of receptivity to the construction of a responsibility frame. For example, consumers may have varying levels of concern about responsible sourcing. This suggests that responsibilization is shaped by broader normative and regulatory environments and varying stakeholder expectations about corporate responsibility (Lange and Washburn, 212). *Second*, sectors have different 'industry structures' and companies have different 'corporate cultures' that render them more or less vulnerable to social movement or regulatory actions (Schurman, 2004). Big household names such as Nike tend to be more concerned about their reputation and more vulnerable than smaller firms, or those producing generic products. *Third*, the emergence of a field frame of responsibility may be contingent on 'political opportunity structures' (Gamson and Meyer, 1996) that shape activists' decisions about initiating change. However, political opportunity structures are themselves 'socially constructed' (Campbell, 2005, p. 49). In our case, legislators had gone through several failed Congress bills on the issue before they could leverage the Dodd Frank Act opportunity to 'slide in' the conflict mineral rule. Future studies can examine how activists construct political opportunities over a longer time horizon and the role that other social movements may play in these efforts. Also, while external 'jolts', such as social upheavals or environmental disasters (Meyer, Brooks and Goes, 1990) provide contextual openings for responsibilizing companies, they are not entirely 'external' to change efforts, but 'rather figure in an already developing narrative' (Munir, 2005, p. 94). For instance, the 2013 Rana Plaza factory catastrophe in Bangladesh triggered moral outrage and led to over 180 companies signing a legally

binding 'Accord' for greater business responsibility in factory safety. However, the Accord was preceded by years of NGO and unions' efforts to engage businesses following a series of industrial accidents. When Rana Plaza collapsed, 'prepared' actors leveraged the event for pressuring companies into accepting more responsibility. The study of how some events yield responsibilization while others do not is another promising research avenue.

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TABLES AND FIGURES

Table 1: Timeline of selected events

Date	Actor	Event description
1994	RW.	Rwanda Genocide
1999	UN	U.N. peacekeeping operation (MONUC)
2001	UN	U.N.S.C. Resolution: Condemns illegal exploitation of DRC minerals
2002	UN	U.N. report on natural resource exploitation (Focus on forced labour)
2002	NGO	'The war within the war: sexual violence against women and girls in eastern Congo' (Human Rights Watch report)
2003	UN / USA	Launch of Kimberley Process to curb trade in conflict diamonds / US Clean Diamond Trade Act (CDTA)
2003	UN	U.N.S.C. Resolution 1493: Arms embargo on armed groups in DRC
2005	UN	U.N.S.C. Resolution 1596: Sanctions against embargo violations
05/2008	USA	1st Senate Bill: Conflict Coltan and Cassiterite Act of 2008 (CCCA)
2008	UN	U.N.S.C. Resolution: Calls for due diligence on minerals origin
03/2009	Firm	Tin Supply Chain Initiative (iTSCi)
04/2009	NGO	Enough Project launches 'Conflict Minerals Initiative'
2009	NGO	'Conflict-Free Campus' Students Taking Action Now (USA)
04/2009	USA	2nd Senate Bill: Congo Conflict Minerals Act of 2009 (CCMA)
07/2009	NGO	'War and the Militarization of Mining in the Congo' (Global Witness)
11/2009	USA	House Bill: The Conflict Minerals Trade Act of 2009
12/2009	MSI	Launch of Multi-Stakeholder Group (Responsible Sourcing Network)
07/2010	USA	Dodd-Frank Act (Section 1502 on conflict minerals) becomes law
12/2011	OECD	OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
2010	Firm	Conflict-Free Smelter Program (Global e-Sustainability Initiative (Ge-SI)/Electronics Industry Citizenship Coalition (EICC))
06/2011	UN	U.N. Guiding Principles on Business and Human Rights
2010/11	DRC	Ban on all mining in the Eastern DRC
06/2011	Firm	Solutions for Hope (Motorola/AVX) for conflict-free tantalum
10/2011	PPA	Public-Private Alliance for Responsible Minerals Trade (PPA)
10/2011	USA	California Public Procurement Law (SB 861) on conflict minerals
03/2012	Firm	Responsible Jewellery Council Chain-of-Custody Standard
05/2012	Firm	London Bullion Market Association Responsible Gold Forum
05/2012	Firm	World Gold Council Conflict-free standard
08/2012	USA	SEC Final Rule on conflict minerals
09/2012	Firm	iPoint Conflict Minerals Platform (Automotive Industry Action Group)
10/2012	PPA	Conflict-Free Tin Initiative
03/2014	EU	European Union draft legislation on conflict minerals
05/2014	SEC	1st SEC Disclosure of Conflict Minerals Reports due

Table 2: Overview of frame shifts, core mechanisms and illustrative data

Frame shift	Previous Frame	New frame	Mechanisms and illustrative quotes
1a: 2008-2010 NGOs, US State	Intractable and 'lost cause' *Lack of convincing narrative 'in terms of inspiring action and making people feel like they can do something about it.' (NGO$_1$).*	Amenable to intervention *'We ought to do all we can to make sure that the products we use and the minerals we import, in no way support those who violate human rights abroad.' (Sen. Durbin, press release, 23.05.2008)*	Cognitive shortcuts – Reducing complexity and narrowing scope to single 'root cause' *'1,500 people a day dying because of this; $400 a pound for Coltan, financing this death and destruction daily.' (US Sen. Brownback, Cong Rec S1047, focusing on single issue as 'roots cause')*
1b: 2008-2010 NGOs / US state	Wicked problem as public responsibility *'First, the U.S. must focus its policy priorities on the humanitarian and national security implications…the U.S. and its allies must help the newly elected Congo government.' (Enough, 2007)*	Wicked problem as private responsibility *'Suddenly, the war is not a problem of inadequate governance, but one of trade-driven violence to be solved by multi-national electronics manufacturers.' (I$_{15}$)*	Causal linkage between target and 'root cause' *'Without knowing it, tens of millions of people in the United States may be putting money in the pockets of some of the worst human rights violators in the world, simply by using a cell phone or laptop computer.' (Sen Durbin, 23 May 2008)*
1c: 2008-2010 NGOs	Remote back-of-the-mind issue *'Do consumers care? Does a consumer go into a shop and ask what's the source of your material?…My guess is most consumers don't care.' (I9)*	'Connected' front-of-the-mind issue *'Your mobile phone [is] screaming in your ear that….you are complicit in murder, torture and rape of millions in the remote eastern edge of…Congo.' (News item, 2009)*	Emotional connectivity between audience (consumers) and issue (sexual violence) *'You make that connection about laptops and MP3s and cell phones and stuff…you're connecting youth with something that speaks to youth.' (NGO$_9$)*
2: 2010 NGOs / US state	Companies deny responsibility *'It's really a security problem and a longstanding ethnic conflict…then we got involved in lobbying against what became Dodd Frank.' (I$_{14}$)*	Companies acquiesce to responsibility *'Our official position…is that we're deeply distressed by what's going on in the DRC…But we do not believe that … any supply chain initiative is the appropriate way to address that… Obviously once there is a law they're going to comply.' (I$_{14}$)*	i. Inducing social judgments through exposure *Naming and shaming has a powerful role to play in changing corporate behaviour. It shouldn't be relegated as a sort of shameful tactic.' (NGO$_3$).* ii. Inducing social judgments through self-disclosure *'If Apple is sourcing from a mine filled with human rights abuses, then Apple's reputation suffers. That could lead to a decrease in the stock price.' (NGO$_3$)*
3: >2010 NGOs/ US state, SEC / Industry	Companies acquiesce to responsibility *(see above)*	Corporations assume political role *'This is the moment for manufacturers every-where to be powerful actors for good, to fundamentally change the way minerals are bought.'* *(Motorola Solution for Hope, 2012)*	Deliberative integration of companies *'Through that multi-stakeholder working group a lot of the advocacy groups and companies actually came to know each other […] through that process some of them have now moved forward.' (NGO$_7$)*

Figure 1: A model of corporate responsibilization for wicked problems
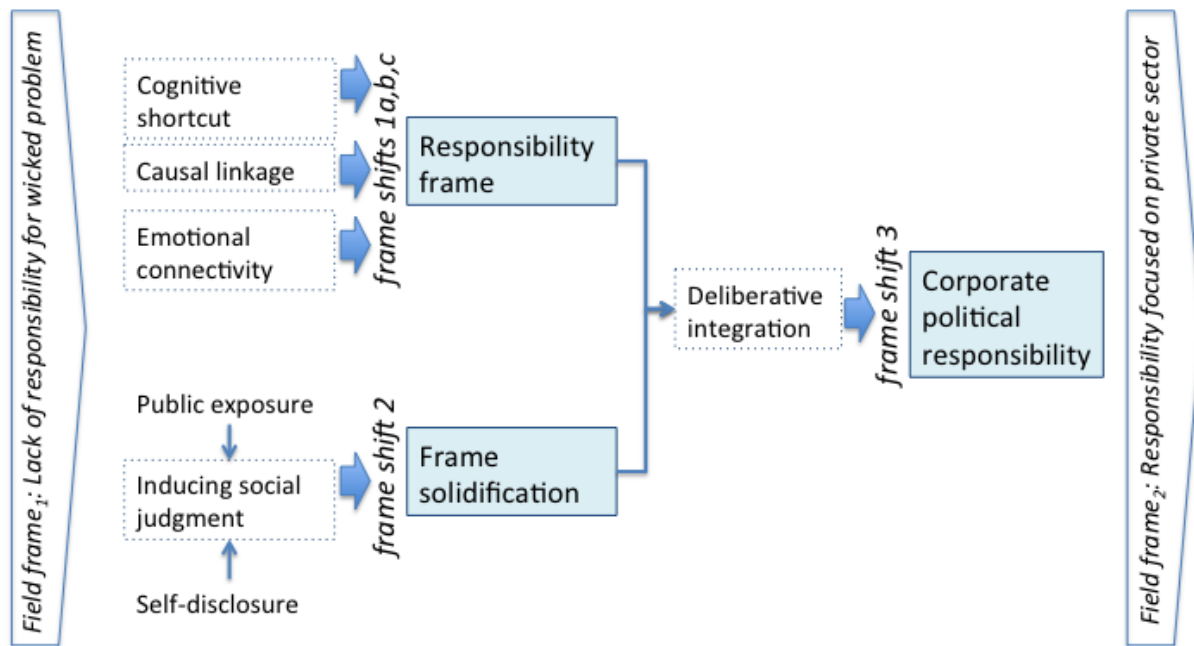
[i] The legislation came into effect for the calendar year beginning January 1, 2013 with the first reports due May 31, 2014. Industry associations lost court battles to avert this legislative requirement to disclose whether their supply chains are free of conflict minerals. They are still free to use minerals linked to conflict but need to disclose it.