

**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549**

**FORM SD**

**Specialized Disclosure Report**

**FABRINET**

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(Exact name of the registrant as specified in its charter)

**Cayman Islands**

**001-34775**

**98-12228572**

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(State of other jurisdiction of  
incorporation or organization)

(Commission  
File Number)

(IRS Employer  
Identification No.)

**c/o Intertrust Corporate Services  
One Nexus Way, Camana Bay  
Grand Cayman  
KY1-9005**

**Cayman Islands**

(Address of principal executive offices)

Csaba Sverha  
Chief Financial Officer  
+66 2-524-9600

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(Name and telephone number, including area code, of the  
person to contact in connection with this report)

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

☒ Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2021.

## **Section 1 - Conflict Minerals Disclosure**

### **Item 1.01 Conflict Minerals Disclosure and Report**

This Specialized Disclosure Report on Form SD and the Conflict Minerals Report, filed as Exhibit 1.01 to this Form SD, are publicly available at [investor.fabrinet.com/financial-information/sec-filings](http://investor.fabrinet.com/financial-information/sec-filings).

Any websites referenced in this Form SD and the information accessible through them are not incorporated in this Form SD.

### **Item 1.02 Exhibit**

The Conflict Minerals Report required by Item 1.01 is filed as Exhibit 1.01 to this Form SD.

**Section 2 - Exhibits**

**Item 2.01 Exhibits**

<b>Exhibit No.</b>	<b>Description</b>
1.01	<a href="#"><u>Fabrinet Conflict Minerals Report for Calendar Year 2021.</u></a>

## SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

### FABRINET

(Registrant)

By: /s/ Csaba Sverha  
**Csaba Sverha**  
Executive Vice President, Chief Financial Officer

May 27, 2022  
**(Date)**

**FABRINET  
CONFLICT MINERALS REPORT  
YEAR ENDED DECEMBER 31, 2021**

## **I. Introduction**

We provide advanced optical packaging and precision optical, electro-mechanical and electronic manufacturing services to original equipment manufacturers (“OEMs”) of complex products such as optical communication components, modules and sub-systems, industrial lasers, automotive components, medical devices and sensors.

We offer a broad range of advanced optical and electro-mechanical capabilities across the entire manufacturing process, including process design and engineering, supply chain management, manufacturing, complex printed circuit board assembly, advanced packaging, integration, final assembly and testing.

Certain products that we manufacture for our customers contain materials or components that use tin, tantalum, tungsten and/or gold (“3TG”). Due to the depth of the supply chain, we are far removed from the sources of ore from which these metals are produced and the smelters/refiners that process those ores. The efforts we undertook to identify the country(ies) of origin of those minerals reflect our circumstances and position in the supply chain. The amount of information available globally on the traceability and sourcing of these ores is limited at this time, and this situation is not unique to us. We have taken steps we believe reasonable under the circumstances to identify the applicable smelters and refiners of 3TG in our supply chain; however, we believe the smelters and refiners of 3TG contained in the products we manufacture for our customers are best situated to identify the sources and countries of origin of 3TG.

We do not directly manufacture products but “contract to manufacture” branded and generic products containing 3TG on behalf of our customers. Our due diligence efforts were undertaken on the exclusive and/or privately-branded products sourced directly by and manufactured for us in 2021.

## **II. Reasonable Country of Origin Inquiry (RCOI)**

Direct suppliers were asked to provide answers to the Responsible Business Alliance (formerly known as the Electronic Industry Citizenship Coalition) (“RBA”) / Global e-Sustainability Initiative (GeSI) Conflict Minerals Common Reporting Template reflecting Fabrinet’s position in the supply chain (the “CMRT”). The CMRT includes questions regarding a direct supplier’s conflict-free policy, its due diligence process, and information about its supply chain such as the names and locations of smelters and refiners and the origin of 3TG used by those facilities. The CMRT is regarded as the most common reporting tool for conflict minerals content and sourcing information worldwide, developed by several of the world’s leading consumer electronics companies.

Utilizing a third-party service provider to assist with our RCOI, our service provider reviewed the responses received to the questionnaires for completeness and consistency of answers. Suppliers were required to provide corrections and clarifications where needed. Our service provider also performed smelter/refiner validation based on the names of the provided smelter/refiner. Based on the RCOI, we do not have sufficient information from our direct suppliers to determine the sources of the necessary 3TG contained in the products we manufacture for our customers.

We believe our RCOI process was reasonably designed and performed in good faith, but there are inherent limitations in the information provided to us by third parties, including the possibility of information being inaccurate, incomplete or falsified despite our efforts to validate and confirm the information.

### III. Due Diligence Program

We designed our overall conflict minerals procedures based on, and in conformity with the five-step framework of set forth in the Second Edition of the Organisation for Economic Co-operation and Development's *Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*. We implemented appropriate elements of the five-step framework as were reasonably applied to our circumstances and position in the supply chain as a "downstream" company with little to no direct influence on smelters/refiners. The five-step framework consists of:

(1) Establish strong company management systems:

- We adopted and published our Conflict Minerals Sourcing Policy, a copy of which is publicly available on our website at [fabrinet.com/services/supply-chain](http://fabrinet.com/services/supply-chain).
- We created a conflict minerals task force led by our supply chain management organization to implement our Conflict Minerals Sourcing Policy.
- We communicated our Conflict Minerals Sourcing Policy to our direct suppliers.
- We have conducted awareness sessions concerning the commitments and requirements expected of our suppliers.

(2) Identify and assess risks in the supply chain:

- We identified direct suppliers that supply product or material that may contain conflict minerals.
- We engaged a third-party service provider to perform the RCOI as follows:
  - conducted supplier surveys using the CMRT
  - reviewed responses to the CMRT for completeness and consistency of answers. Suppliers were required to provide corrections and clarifications where needed.
  - compared smelters and refiners identified by suppliers to the Responsible Minerals Initiative's ("RMI") list of validated conflict free facilities for initial risk screening.

(3) Design and implement a strategy to respond to identified risks:

- We reported to senior management on direct suppliers' responses to our conflict minerals information requests, including updates on monitoring and tracking corrective action and risk mitigation efforts (where applicable).
- Using a third-party service, we compared smelters and refiners identified by suppliers to the RMI lists of validated conflict free and verified facilities and the U.S. Department of Commerce "Reporting Requirements Under Section 1502(d)(3)(C) of the Dodd-Frank Act World-Wide Conflict Mineral Processing Facilities" and conducted our own supplemental research on smelters and refiners.
- We developed a risk mitigation plan that allows for continued trade with a supplier during the supplier's risk mitigation efforts.

(4) Carry out independent third-party audit of supply chain due diligence at identified points in the supply chain:

- We do not perform or direct audits of 3TG smelters or refiners. We rely on audits conducted by third parties through our membership in the RBA, supplier self-disclosures of certification status, and our policy and procurement practices that encourage suppliers to purchase materials from audited smelters and refiners.

(5) Report on supply chain due diligence:

- We communicated our Conflict Minerals Report on our website at [fabrinet.com/services/supply-chain](http://fabrinet.com/services/supply-chain).

#### IV. Product Determination

We received inconclusive data from our direct suppliers, and our material source information is still developing. Therefore, we are unable to make a definitive determination about the sources of 3TG in the products we manufacture for our customers. At the same time, we received no information from our direct suppliers indicating that the 3TG in our Covered Products (as defined below) directly or indirectly financed or benefited armed groups in the Democratic Republic of the Congo and the adjoining countries of Angola, Burundi, the Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia. Some suppliers disclosed to us that scrap or recycled sources of 3TG were identified in their supply chains and did not require due diligence.

#### V. Product Description

Our customer base includes companies in complex industries that require advanced precision manufacturing capabilities, such as optical communications, industrial lasers and sensors. The products that we manufacture for our OEM customers include: selective switching products; tunable lasers, transponders and transceivers; active optical cables; solid state, diode-pumped, gas and fiber lasers; and sensors (collectively, the “Covered Products”).

We identified the following smelters and refiners that have achieved Conflict Free designation by the RMI or an audit program with which RMI has mutual recognition, are actively in the process of obtaining the designations, or for which we independently obtained country of origin information. We were unable to definitively link the identified smelters and refiners to only those products and materials in our supply chain; therefore, the following list likely contains more processing facilities than are actually in our supply chain or Covered Products.

Mineral	Verified Smelters
Gold	Argor-Heraeus S.A.
Gold	Asahi Pretec Corp.
Gold	Dowa
Gold	Eco-System Recycling Co., Ltd. East Plant
Gold	Heraeus Metals Hong Kong Ltd.
Gold	Ishifuku Metal Industry Co., Ltd.
Gold	JX Nippon Mining & Metals Co., Ltd.
Gold	Kojima Chemicals Co., Ltd.
Gold	Matsuda Sangyo Co., Ltd.
Gold	Mitsubishi Materials Corporation
Gold	Mitsui Mining and Smelting Co., Ltd.
Gold	Nihon Material Co., Ltd.
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.
Gold	Solar Applied Materials Technology Corp.
Gold	Sumitomo Metal Mining Co., Ltd.
Gold	Tanaka Kikinzoku Kogyo K.K.
Gold	Tokuriki Honten Co., Ltd.
Gold	Advanced Chemical Company
Gold	Aida Chemical Industries Co., Ltd.
Gold	Allgemeine Gold-und Silberscheideanstalt A.G.
Gold	Almalyk Mining and Metallurgical Complex (AMMC)
Gold	AngloGold Ashanti Corrego do Sitio Mineracao
Gold	Asaka Riken Co., Ltd.
Gold	Atasay Kuyumculuk Sanayi Ve Ticaret A.S.

Gold	Aurubis AG
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)
Gold	Boliden AB
Gold	C. Hafner GmbH + Co. KG
Gold	Caridad
Gold	CCR Refinery - Glencore Canada Corporation
Gold	Cendres + Metaux S.A.
Gold	Yunnan Copper Industry Co., Ltd.
Gold	Chimet S.p.A.
Gold	Chugai Mining
Gold	Daye Non-Ferrous Metals Mining Ltd.
Gold	DSC (Do Sung Corporation)
Gold	Refinery of Seemine Gold Co., Ltd.
Gold	Guoda Safina High-Tech Environmental Refinery Co., Ltd.
Gold	Hangzhou Fuchunjiang Smelting Co., Ltd.
Gold	LT Metal Ltd.
Gold	Heimerle + Meule GmbH
Gold	Heraeus Precious Metals GmbH & Co. KG
Gold	Hunan Chenzhou Mining Co., Ltd.
Gold	Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd.
Gold	HwaSeong CJ CO., LTD.
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.
Gold	Istanbul Gold Refinery
Gold	Japan Mint
Gold	Jiangxi Copper Co., Ltd.
Gold	Asahi Refining USA Inc.
Gold	Asahi Refining Canada Ltd.
Gold	Kazakhmys Smelting LLC
Gold	Kazzinc
Gold	Kennecott Utah Copper LLC
Gold	L'azurde Company For Jewelry
Gold	Lingbao Gold Co., Ltd.
Gold	Lingbao Jinyuan Tonghui Refinery Co., Ltd.
Gold	LS-NIKKO Copper Inc.
Gold	Luoyang Zijin Yinhui Gold Refinery Co., Ltd.
Gold	Materion
Gold	Metalor Technologies (Suzhou) Ltd.
Gold	Metalor Technologies (Hong Kong) Ltd.
Gold	Metalor Technologies (Singapore) Pte., Ltd.
Gold	Metalor Technologies S.A.
Gold	Metalor USA Refining Corporation
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.
Gold	Navoi Mining and Metallurgical Combinat
Gold	Ohura Precious Metal Industry Co., Ltd.
Gold	PAMP S.A.



Gold	Penglai Penggang Gold Industry Co., Ltd.
Gold	PT Aneka Tambang (Persero) Tbk
Gold	PX Precinox S.A.
Gold	Rand Refinery (Pty) Ltd.
Gold	Royal Canadian Mint
Gold	Sabin Metal Corp.
Gold	Samduck Precious Metals
Gold	Samwon Metals Corp.
Gold	SEMPA Joyeria Plateria S.A.
Gold	Shandong Tiancheng Biological Gold Industrial Co., Ltd.
Gold	Sichuan Tianze Precious Metals Co., Ltd.
Gold	Super Dragon Technology Co., Ltd.
Gold	Great Wall Precious Metals Co., Ltd. of CBPM
Gold	The Refinery of Shandong Gold Mining Co., Ltd.
Gold	Tongling Nonferrous Metals Group Co., Ltd.
Gold	Torecom
Gold	Umicore S.A. Business Unit Precious Metals Refining
Gold	United Precious Metal Refining, Inc.
Gold	Valcambi S.A.
Gold	Western Australian Mint (T/a The Perth Mint)
Gold	Yamakin Co., Ltd.
Gold	Yokohama Metal Co., Ltd.
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.
Gold	Morris and Watson
Gold	SAFINA A.S.
Gold	Guangdong Jinding Gold Limited
Gold	Umicore Precious Metals Thailand
Gold	Geib Refining Corporation
Gold	MMTC-PAMP India Pvt., Ltd.
Gold	KGHM Polska Miedz Spolka Akcyjna
Gold	Singway Technology Co., Ltd.
Gold	Shandong Humon Smelting Co., Ltd.
Gold	Shenzhen Zhonghenglong Real Industry Co., Ltd.
Gold	Al Etihad Gold Refinery DMCC
Gold	Emirates Gold DMCC
Gold	International Precious Metal Refiners
Gold	T.C.A S.p.A
Gold	REMONDIS PMR B.V.
Gold	Fujairah Gold FZC
Gold	Shirpur Gold Refinery Ltd.
Gold	Korea Zinc Co., Ltd.
Gold	Marsam Metals
Gold	TOO Tau-Ken-Altyn
Gold	Abington Reldan Metals, LLC
Gold	SAAMP

Gold	L'Orfebre S.A.
Gold	8853 S.p.A.
Gold	Italpreziosi
Gold	WIELAND Edelmetalle GmbH
Gold	Ogussa Österreichische Gold- und Silber-Scheideanstalt GmbH
Gold	AU Traders and Refiners
Gold	GCC Gujrat Gold Centre Pvt. Ltd.
Gold	Sai Refinery
Gold	Modeltech Sdn Bhd
Gold	Bangalore Refinery
Gold	Degussa Sonne / Mond Goldhandel GmbH
Gold	Pease & Curren
Gold	JALAN & Company
Gold	SungEel HiMetal Co., Ltd.
Gold	Planta Recuperadora de Metales SpA
Gold	Safimet S.p.A
Gold	State Research Institute Center for Physical Sciences and Technology
Gold	Gold Coast Refinery
Gold	NH Recytech Company
Gold	QG Refining, LLC
Gold	Dijllah Gold Refinery FZC
Gold	CGR Metalloys Pvt Ltd.
Gold	Sovereign Metals
Gold	C.I Metales Procesados Industriales SAS
Gold	Eco-System Recycling Co., Ltd. North Plant
Gold	Eco-System Recycling Co., Ltd. West Plant
Gold	Augmont Enterprises Private Limited
Gold	Kundan Care Products Ltd.
Gold	Emerald Jewel Industry India Limited (Unit 1)
Gold	Emerald Jewel Industry India Limited (Unit 2)
Gold	Emerald Jewel Industry India Limited (Unit 3)
Gold	Emerald Jewel Industry India Limited (Unit 4)
Gold	K.A. Rasmussen
Gold	Alexy Metals
Tantalum	F&X Electro-Materials Ltd.
Tantalum	Changsha South Tantalum Niobium Co., Ltd.
Tantalum	Guangdong Zhiyuan New Material Co., Ltd.
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.
Tantalum	Jiujiang Tanbre Co., Ltd.
Tantalum	LSM Brasil S.A.
Tantalum	Metallurgical Products India Pvt., Ltd.
Tantalum	Mineracao Taboca S.A.
Tantalum	Mitsui Mining and Smelting Co., Ltd.
Tantalum	NPM Silmet AS
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.
Tantalum	QuantumClean

Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.
Tantalum	Taki Chemical Co., Ltd.
Tantalum	Telex Metals
Tantalum	Ulba Metallurgical Plant JSC
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.
Tantalum	D Block Metals, LLC
Tantalum	FIR Metals & Resource Ltd.
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.
Tantalum	KEMET Blue Metals
Tantalum	H.C. Starck Co., Ltd.
Tantalum	H.C. Starck Tantalum and Niobium GmbH
Tantalum	H.C. Starck Hermsdorf GmbH
Tantalum	H.C. Starck Inc.
Tantalum	H.C. Starck Ltd.
Tantalum	H.C. Starck Smelting GmbH & Co. KG
Tantalum	Global Advanced Metals Boyertown
Tantalum	Global Advanced Metals Aizu
Tantalum	Resind Industria e Comercio Ltda.
Tantalum	Jiangxi Tuohong New Raw Material
Tantalum	Yancheng Jinye New Material Technology Co., Ltd.
Tantalum	F&X Electro-Materials Ltd.
Tantalum	Changsha South Tantalum Niobium Co., Ltd.
Tantalum	Guangdong Zhiyuan New Material Co., Ltd.
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.
Tantalum	Jiujiang Tanbre Co., Ltd.
Tantalum	LSM Brasil S.A.
Tin	Jiangxi New Nanshan Technology Ltd.
Tin	O.M. Manufacturing (Thailand) Co., Ltd.
Tin	Operaciones Metalurgicas S.A.
Tin	PT Artha Cipta Langgeng
Tin	PT Babel Inti Perkasa
Tin	PT Babel Surya Alam Lestari
Tin	PT Bukit Timah
Tin	PT Prima Timah Utama
Tin	PT Sariwiguna Binasentosa
Tin	PT Stanindo Inti Perkasa
Tin	PT Tinindo Inter Nusa
Tin	Rui Da Hung
Tin	Soft Metais Ltda.
Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.
Tin	White Solder Metalurgia e Mineracao Ltda.
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.
Tin	Yunnan Tin Company Limited
Tin	Magnu's Minerais Metais e Ligas Ltda.

Tin	Melt Metais e Ligas S.A.
Tin	PT ATD Makmur Mandiri Jaya
Tin	O.M. Manufacturing Philippines, Inc.
Tin	PT Cipta Persada Mulia
Tin	Resind Industria e Comercio Ltda.
Tin	Super Ligas
Tin	Metallo Spain S.L.U.
Tin	PT Menara Cipta Mulia
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.
Tin	PT Bangka Serumpun
Tin	Tin Technology & Refining
Tin	Ma'anshan Weitai Tin Co., Ltd.
Tin	PT Rajawali Rimba Perkasa
Tin	Luna Smelter, Ltd.
Tin	CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda
Tin	CRM Synergies
Tin	Fabrica Auricchio Industria e Comercio Ltda.
Tin	Jiangxi New Nanshan Technology Ltd.
Tin	O.M. Manufacturing (Thailand) Co., Ltd.
Tin	Operaciones Metalurgicas S.A.
Tin	PT Artha Cipta Langgeng
Tin	PT Babel Inti Perkasa
Tin	PT Babel Surya Alam Lestari
Tin	PT Bukit Timah
Tin	PT Prima Timah Utama
Tin	PT Sariwiguna Binasentosa
Tin	PT Stanindo Inti Perkasa
Tin	PT Tinindo Inter Nusa
Tin	Rui Da Hung
Tin	Soft Metais Ltda.
Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.
Tin	White Solder Metalurgia e Mineracao Ltda.
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.
Tin	Yunnan Tin Company Limited
Tin	Magnu's Minerais Metais e Ligas Ltda.
Tin	Melt Metais e Ligas S.A.
Tin	PT ATD Makmur Mandiri Jaya
Tin	O.M. Manufacturing Philippines, Inc.
Tin	PT Cipta Persada Mulia
Tin	Resind Industria e Comercio Ltda.
Tin	Super Ligas
Tin	Metallo Spain S.L.U.
Tin	PT Menara Cipta Mulia
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.

Tin	PT Bangka Serumpun
Tin	Tin Technology & Refining
Tin	Ma'anshan Weitai Tin Co., Ltd.
Tin	PT Rajawali Rimba Perkasa
Tin	Luna Smelter, Ltd.
Tin	CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda
Tin	CRM Synergies
Tin	Fabrica Auricchio Industria e Comercio Ltda.
Tin	Jiangxi New Nanshan Technology Ltd.
Tin	O.M. Manufacturing (Thailand) Co., Ltd.
Tin	Operaciones Metalurgicas S.A.
Tin	PT Artha Cipta Langgeng
Tin	PT Babel Inti Perkasa
Tin	PT Babel Surya Alam Lestari
Tin	PT Bukit Timah
Tin	PT Prima Timah Utama
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.
Tungsten	Xiamen Tungsten Co., Ltd.
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.
Tungsten	A.L.M.T. Corp.
Tungsten	Kennametal Huntsville
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.
Tungsten	Global Tungsten & Powders Corp.
Tungsten	Hunan Chenzhou Mining Co., Ltd.
Tungsten	Japan New Metals Co., Ltd.
Tungsten	Kennametal Fallon
Tungsten	Wolfram Bergbau und Hutten AG
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.
Tungsten	Malipo Haiyu Tungsten Co., Ltd.
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.
Tungsten	Asia Tungsten Products Vietnam Ltd.
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.
Tungsten	H.C. Starck Tungsten GmbH
Tungsten	H.C. Starck Smelting GmbH & Co. KG
Tungsten	Masan Tungsten Chemical LLC (MTC)

Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.
Tungsten	Niagara Refining LLC
Tungsten	China Molybdenum Co., Ltd.
Tungsten	Ganzhou Haichuang Tungsten Co., Ltd.
Tungsten	Philippine Chuangxin Industrial Co., Inc.
Tungsten	Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.
Tungsten	ACL Metais Eireli
Tungsten	KGETS Co., Ltd.
Tungsten	Fujian Ganmin RareMetal Co., Ltd.
Tungsten	Lianyou Metals Co., Ltd.
Tungsten	GEM Co., Ltd.
Tungsten	Albasteel Industria e Comercio de Ligas Para Fundicao Ltd.
Tungsten	Cronimet Brasil Ltda
Tungsten	Fujian Xinlu Tungsten
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.
Tungsten	Xiamen Tungsten Co., Ltd.
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.
Tungsten	A.L.M.T. Corp.
Tungsten	Kennametal Huntsville
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.
Tungsten	Global Tungsten & Powders Corp.
Tungsten	Hunan Chenzhou Mining Co., Ltd.

## VI. Countries of Origin Identified

Aland Islands, Albania, American Samoa, Andorra, Argentina, Armenia, Australia, Austria, Belarus, Belgium, Bermuda, Bolivia, Brazil, Bulgaria, Cambodia, Canada, Chile, China, Colombia, Czech Republic, Dominica, Dominican Republic, Ecuador, Egypt, Eritrea, Estonia, France, Germany, Hong Kong, Hungary, India, Indonesia, Ireland, Israel, Italy, Japan, Kazakhstan, Kenya, Korea (Republic of), Kyrgyzstan, Liberia, Lithuania, Luxembourg, Madagascar, Malaysia, Mali, Mauritania, Mexico, Mongolia, Morocco, Netherlands, New Zealand, Nigeria, Panama, Papua New Guinea, Peru, Philippines, Poland, Saudi Arabia, Singapore, South Africa, Spain, Suriname, Sweden, Switzerland, Taiwan, Thailand, Turkey, United Arab Emirates, United Kingdom, United States, Uzbekistan, Vietnam, Zimbabwe. Covered Countries were identified only for RMI audited facilities.

## **VII. Steps to Improve Due Diligence**

We will continue to communicate our expectations and information requirements to our direct suppliers. We will also continue to monitor changes in circumstances that may impact the facts or our determination. Over time, we anticipate that the amount of information globally on the traceability and sourcing of these minerals will increase and improve our knowledge. We will continue to make inquiries to our direct suppliers and undertake additional fact and risk assessments where potentially relevant changes in facts or circumstances are identified. New products will be reviewed for conflict minerals conformance during initial qualification. If we become aware of a supplier whose due diligence needs improvement, we intend to continue the trade relationship while that supplier improves its performance. We expect our suppliers to take similar measures with their suppliers to ensure alignment throughout the supply chain.

## **VIII. Independent Private Sector Audit**

Not required for calendar year 2021.