

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**

(State of other jurisdiction of  
incorporation or organization)

**001-34775**

(Commission  
File Number)

**98-12228572**

(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, 2020.

## **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 <https://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="#">Fabrinet Conflict Minerals Report for Calendar Year 2020.</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 28, 2021  
**(Date)**

**FABRINET  
CONFLICT MINERALS REPORT  
YEAR ENDED DECEMBER 31, 2020**

**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 2020.

**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 <https://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 <https://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    | Asaka Riken Co., Ltd.   |
| Gold    | Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd.                         |
| Gold    | Japan Mint  |
| Gold    | AngloGold Ashanti Corrego do Sitio Mineracao                                |
| Gold    | Daye Non-Ferrous Metals Mining Ltd.   |
| Gold    | Asahi Refining USA Inc.   |
| Gold    | Atasay Kuyumculuk Sanayi Ve Ticaret A.S.                                    |
| Gold    | Ohura Precious Metal Industry Co., Ltd.                                     |
| Gold    | JX Nippon Mining & Metals Co., Ltd.   |
| Gold    | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) |
| Gold    | Prioksky Plant of Non-Ferrous Metals  |
| Gold    | Kazzinc   |
| Gold    | Penglai Penggang Gold Industry Co., Ltd.                                    |
| Gold    | Tokuriki Honten Co., Ltd.   |
| Gold    | Asahi Refining Canada Ltd.  |
| Gold    | JSC Ekaterinburg Non-Ferrous Metal Processing Plant                         |
| Gold    | PAMP S.A.   |
| Gold    | Torecom   |
| Gold    | Tongling Nonferrous Metals Group Co., Ltd.                                  |
| Gold    | KGHM Polska Miedz Spolka Akcyjna  |
| Gold    | Singway Technology Co., Ltd.  |
| Gold    | Umicore S.A. Business Unit Precious Metals Refining                         |
| Gold    | The Refinery of Shandong Gold Mining Co., Ltd.                              |

|      |  |
|------|--|
| Gold | United Precious Metal Refining, Inc.                 |
| Gold | Fidelity Printers and Refiners Ltd.                  |
| Gold | Shandong Humon Smelting Co., Ltd.                    |
| Gold | Shenzhen Zhonghenglong Real Industry Co., Ltd.       |
| Gold | African Gold Refinery                                |
| Gold | Gold Coast Refinery                                  |
| Gold | DS PRETECH Co., Ltd.                                 |
| Gold | Aida Chemical Industries Co., Ltd.                   |
| Gold | PT Aneka Tambang (Persero) Tbk                       |
| Gold | WIELAND Edelmetalle GmbH                             |
| Gold | Asahi Pretec Corp.                                   |
| Gold | Advanced Chemical Company                            |
| Gold | Refinery of Seemine Gold Co., Ltd.                   |
| Gold | Navoi Mining and Metallurgical Combinat              |
| Gold | Aurubis AG   |
| Gold | JSC Uralelectromed                                   |
| Gold | DODUCO Contacts and Refining GmbH                    |
| Gold | Sumitomo Metal Mining Co., Ltd.                      |
| Gold | OJSC Novosibirsk Refinery                            |
| Gold | Allgemeine Gold-und Silberscheideanstalt A.G.        |
| Gold | Kazakhmys Smelting LLC                               |
| Gold | Kyrgyzaltyn JSC                                      |
| Gold | L'azurde Company For Jewelry                         |
| Gold | Yamakin Co., Ltd.                                    |
| Gold | Shirpur Gold Refinery Ltd.                           |
| Gold | SAXONIA Edelmetalle GmbH                             |
| Gold | Almalyk Mining and Metallurgical Complex (AMMC)      |
| Gold | Kennecott Utah Copper LLC                            |
| Gold | Heimerle + Meule GmbH                                |
| Gold | Kojima Chemicals Co., Ltd.                           |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.S.               |
| Gold | Heraeus Metals Hong Kong Ltd.                        |
| Gold | Heraeus Precious Metals GmbH & Co. KG                |
| Gold | PX Precinox S.A.                                     |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals |
| Gold | Rand Refinery (Pty) Ltd.                             |
| Gold | Hunan Chenzhou Mining Co., Ltd.                      |
| Gold | Chugai Mining  |
| Gold | HwaSeong CJ CO., LTD.                                |
| Gold | Nihon Material Co., Ltd.                             |
| Gold | Solar Applied Materials Technology Corp.             |
| Gold | Royal Canadian Mint                                  |
| Gold | Istanbul Gold Refinery                               |
| Gold | Korea Zinc Co., Ltd.                                 |
| Gold | TOO Tau-Ken-Altyn                                    |
| Gold | Smelter Not Listed                                   |



|      |   |
|------|---|
| Gold | Yokohama Metal Co., Ltd.  |
| Gold | REMONDIS PMR B.V.   |
| Gold | MMTC-PAMP India Pvt., Ltd.                                      |
| Gold | Fujairah Gold FZC   |
| Gold | Tony Goetz NV   |
| Gold | Marsam Metals   |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. |
| Gold | Ishifuku Metal Industry Co., Ltd.                               |
| Gold | Jiangxi Copper Co., Ltd.  |
| Gold | Bangko Sentral ng Pilipinas (Central Bank of the Philippines)   |
| Gold | Chimet S.p.A.   |
| Gold | Lingbao Gold Co., Ltd.  |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd.                      |
| Gold | CGR Metalloys Pvt Ltd.  |
| Gold | Sovereign Metals  |
| Gold | Materion  |
| Gold | Matsuda Sangyo Co., Ltd.  |
| Gold | Cendres + Metaux S.A.   |
| Gold | Yunnan Copper Industry Co., Ltd.                                |
| Gold | DSC (Do Sung Corporation)                                       |
| Gold | Eco-System Recycling Co., Ltd. East Plant                       |
| Gold | Guoda Safina High-Tech Environmental Refinery Co., Ltd.         |
| Gold | Luoyang Zijin Yinhui Gold Refinery Co., Ltd.                    |
| Gold | Samduck Precious Metals   |
| Gold | Samwon Metals Corp.   |
| Gold | SEMPSA Joyeria Plateria S.A.                                    |
| Gold | Metalor Technologies (Singapore) Pte., Ltd.                     |
| Gold | Metalor Technologies S.A.                                       |
| Gold | LS-NIKKO Copper Inc.  |
| Gold | Sabin Metal Corp.   |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd.         |
| Gold | Metalor USA Refining Corporation                                |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.               |
| Gold | Tanaka Kikinzoku Kogyo K.K.                                     |
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM                    |
| Gold | Metalurgica Met-Mex Penoles S.A. De C.V.                        |
| Gold | Gold Refinery of Zijin Mining Group Co., Ltd.                   |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation             |
| Gold | C.I Metales Procesados Industriales SAS                         |
| Gold | Eco-System Recycling Co., Ltd. North Plant                      |
| Gold | Eco-System Recycling Co., Ltd. West Plant                       |
| Gold | C. Hafner GmbH + Co. KG   |
| Gold | Geib Refining Corporation                                       |
| Gold | Abington Reldan Metals, LLC                                     |
| Gold | LT Metal Ltd.   |
| Gold | Umicore Precious Metals Thailand                                |

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| Gold     | Guangdong Jinding Gold Limited                                       |
| Gold     | Mitsubishi Materials Corporation                                     |
| Gold     | State Research Institute Center for Physical Sciences and Technology |
| Gold     | Boliden AB   |
| Gold     | Mitsui Mining and Smelting Co., Ltd.                                 |
| Gold     | Sudan Gold Refinery  |
| Gold     | NH Recytech Company  |
| Gold     | Al Etihad Gold Refinery DMCC   |
| Gold     | Hangzhou Fuchunjiang Smelting Co., Ltd.                              |
| Gold     | Valcambi S.A.  |
| Gold     | 8853 S.p.A.  |
| Gold     | Sichuan Tianze Precious Metals Co., Ltd.                             |
| Gold     | Emirates Gold DMCC   |
| Gold     | International Precious Metal Refiners                                |
| Gold     | Degussa Sonne / Mond Goldhandel GmbH                                 |
| Gold     | Dijllah Gold Refinery FZC  |
| Gold     | K.A. Rasmussen   |
| Gold     | L'Orfebvre S.A.  |
| Gold     | SAAMP  |
| Gold     | Italpreziosi   |
| Gold     | T.C.A S.p.A  |
| Gold     | JALAN & Company  |
| Gold     | Caridad  |
| Gold     | CCR Refinery - Glencore Canada Corporation                           |
| Gold     | AU Traders and Refiners  |
| Gold     | Augmont Enterprises Private Limited                                  |
| Gold     | Bangalore Refinery   |
| Gold     | Kundan Care Products Ltd.  |
| Gold     | Kaloti Precious Metals   |
| Gold     | Planta Recuperadora de Metales SpA                                   |
| Gold     | SungEel HiMetal Co., Ltd.  |
| Gold     | Dowa   |
| Gold     | Metalor Technologies (Suzhou) Ltd.                                   |
| Gold     | MD Overseas  |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd.                          |
| Tantalum | Asaka Riken Co., Ltd.  |
| Tantalum | Jiujiang Tanbre Co., Ltd.  |
| Tantalum | Ulba Metallurgical Plant JSC   |
| Tantalum | QuantumClean   |
| Tantalum | KEMET Blue Metals  |
| Tantalum | H.C. Starck Co., Ltd.  |
| Tantalum | H.C. Starck Tantalum and Niobium GmbH                                |
| Tantalum | H.C. Starck Inc.   |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd.                         |
| Tantalum | H.C. Starck Hermsdorf GmbH   |
| Tantalum | Power Resources Ltd.   |

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| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd.        |
| Tantalum | Exotech Inc.                                      |
| Tantalum | F&X Electro-Materials Ltd.                        |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd.         |
| Tantalum | Yanling Jincheng Tantalum & Niobium Co., Ltd.     |
| Tantalum | Solikamsk Magnesium Works OAO                     |
| Tantalum | Taki Chemical Co., Ltd.                           |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd.     |
| Tantalum | Resind Industria e Comercio Ltda.                 |
| Tantalum | LSM Brasil S.A.                                   |
| Tantalum | Telex Metals                                      |
| Tantalum | Metallurgical Products India Pvt., Ltd.           |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd. |
| Tantalum | Guangdong Zhiyuan New Material Co., Ltd.          |
| Tantalum | D Block Metals, LLC                               |
| Tantalum | FIR Metals & Resource Ltd.                        |
| Tantalum | Global Advanced Metals Aizu                       |
| Tantalum | Mitsui Mining and Smelting Co., Ltd.              |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd.     |
| Tantalum | Mineracao Taboca S.A.                             |
| Tantalum | NPM Silmet AS                                     |
| Tantalum | H.C. Starck Ltd.                                  |
| Tantalum | H.C. Starck Smelting GmbH & Co. KG                |
| Tantalum | Jiangxi Tuohong New Raw Material                  |
| Tantalum | Global Advanced Metals Boyertown                  |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd.       |
| Tantalum | Asaka Riken Co., Ltd.                             |
| Tantalum | Jiujiang Tanbre Co., Ltd.                         |
| Tin      | Alpha   |
| Tin      | PT Aries Kencana Sejahtera                        |
| Tin      | Gejiu Kai Meng Industry and Trade LLC             |
| Tin      | Operaciones Metalurgicas S.A.                     |
| Tin      | PT Artha Cipta Langgeng                           |
| Tin      | Chifeng Dajingzi Tin Industry Co., Ltd.           |
| Tin      | Smelter Not Listed                                |
| Tin      | PT Bangka Serumpun                                |
| Tin      | Smelter Not Listed                                |
| Tin      | HuiChang Hill Tin Industry Co., Ltd.              |
| Tin      | Pongpipat Company Limited                         |
| Tin      | O.M. Manufacturing Philippines, Inc.              |
| Tin      | PT Menara Cipta Mulia                             |
| Tin      | Novosibirsk Processing Plant Ltd.                 |
| Tin      | O.M. Manufacturing (Thailand) Co., Ltd.           |
| Tin      | Thai Nguyen Mining and Metallurgy Co., Ltd.       |
| Tin      | PT Timah Tbk Kundur                               |
| Tin      | PT Timah Tbk Mentok                               |

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| Tin | PT Timah Nusantara  |
| Tin | PT Tinindo Inter Nusa   |
| Tin | Ma'anshan Weitai Tin Co., Ltd.  |
| Tin | Estanho de Rondonia S.A.  |
| Tin | Fenix Metals  |
| Tin | Jiangxi New Nanshan Technology Ltd.   |
| Tin | Gejiu Zili Mining And Metallurgy Co., Ltd.  |
| Tin | Soft Metais Ltda.   |
| Tin | PT Refined Bangka Tin   |
| Tin | PT Stanindo Inti Perkasa  |
| Tin | Rui Da Hung   |
| Tin | Gejiu City Fuxiang Industry and Trade Co., Ltd.                                       |
| Tin | Smelter Not Listed  |
| Tin | Resind Industria e Comercio Ltda.   |
| Tin | PT Rajehan Ariq   |
| Tin | Smelter Not Listed  |
| Tin | Yunnan Yunfan Non-ferrous Metals Co., Ltd.  |
| Tin | Precious Minerals and Smelting Limited  |
| Tin | An Vinh Joint Stock Mineral Processing Company  |
| Tin | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.                                     |
| Tin | Gejiu Non-Ferrous Metal Processing Co., Ltd.  |
| Tin | Malaysia Smelting Corporation (MSC)   |
| Tin | PT Rajawali Rimba Perkasa   |
| Tin | Luna Smelter, Ltd.  |
| Tin | China Tin Group Co., Ltd.   |
| Tin | Thaisarco   |
| Tin | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.  |
| Tin | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.   |
| Tin | Yunnan Tin Company Limited  |
| Tin | PT Babel Surya Alam Lestari   |
| Tin | PT Mitra Stania Prima   |
| Tin | CV Venus Inti Perkasa   |
| Tin | White Solder Metalurgia e Mineracao Ltda.   |
| Tin | Melt Metais e Ligas S.A.  |
| Tin | Magnu's Minerais Metais e Ligas Ltda.   |
| Tin | Mitsubishi Materials Corporation  |
| Tin | PT ATD Makmur Mandiri Jaya  |
| Tin | EM Vinto  |
| Tin | Metallo Belgium N.V.  |
| Tin | Tuyen Quang Non-Ferrous Metals Joint Stock Company                                    |
| Tin | Mineracao Taboca S.A.   |
| Tin | Minsur  |
| Tin | Metallo Spain S.L.U.  |
| Tin | Super Ligas   |
| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company                                      |

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| Tin      | Gejiu Fengming Metallurgy Chemical Plant                                     |
| Tin      | CV Ayi Jaya  |
| Tin      | Guangdong Hanhe Non-Ferrous Metal Co., Ltd.                                  |
| Tin      | Dowa   |
| Tin      | Metallic Resources, Inc.   |
| Tin      | CRM Synergies  |
| Tin      | Dongguan CiEXPO Environmental Engineering Co., Ltd.                          |
| Tin      | PT Prima Timah Utama   |
| Tin      | VQB Mineral and Trading Group JSC  |
| Tin      | PT Lautan Harmonis Sejahtera   |
| Tin      | Modeltech Sdn Bhd  |
| Tin      | Tin Technology & Refining  |
| Tin      | PT Mitra Sukses Globalindo   |
| Tin      | CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda |
| Tin      | Alpha  |
| Tin      | PT Aries Kencana Sejahtera   |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd.                                  |
| Tungsten | Kennametal Huntsville  |
| Tungsten | A.L.M.T. Corp.   |
| Tungsten | China Molybdenum Co., 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 | Moliren Ltd.   |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd.                                 |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd.                              |
| Tungsten | Ganzhou Haichuang Tungsten Co., Ltd.   |
| Tungsten | Niagara Refining LLC   |
| Tungsten | Philippine Chuangxin Industrial Co., Inc.                                    |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.                  |
| Tungsten | ACL Metais Eireli  |
| Tungsten | Kennametal Fallon  |
| Tungsten | Hunan Chenzhou Mining Co., Ltd.  |
| Tungsten | Global Tungsten & Powders Corp.  |
| Tungsten | Hydrometallurg, JSC  |
| Tungsten | Xiamen Tungsten Co., Ltd.  |
| Tungsten | NPP Tyazhmetprom LLC   |
| Tungsten | GEM Co., Ltd.  |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd.   |
| Tungsten | KGETS Co., Ltd.  |

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| Tungsten | Fujian Ganmin RareMetal Co., Ltd.                             |
| Tungsten | Lianyou Metals Co., Ltd.                                      |
| Tungsten | JSC "Kirovgrad Hard Alloys Plant"                             |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd.                   |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd.                          |
| Tungsten | CNMC (Guangxi) PGMA Co., Ltd.                                 |
| Tungsten | Japan New Metals Co., Ltd.                                    |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd.                            |
| Tungsten | Wolfram Bergbau und Hutten AG                                 |
| Tungsten | Albasteel Industria e Comercio de Ligas Para Fundicao Ltd.    |
| Tungsten | Asia Tungsten Products Vietnam Ltd.                           |
| Tungsten | Unecha Refractory metals plant                                |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd.                           |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd.                               |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd.                              |
| Tungsten | Artek LLC   |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.         |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd.                       |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd.                            |
| Tungsten | Cronimet Brasil Ltda  |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd.                   |
| Tungsten | Kennametal Huntsville   |
| Tungsten | A.L.M.T. Corp.  |
| Tungsten | China Molybdenum Co., Ltd.                                    |

## VI. Countries of Origin Identified

Albania, Armenia, Angola, Australia, Austria, Belarus, Belgium, Bolivia, Brazil, Canada, Chile, China, Colombia, Czech Republic, Djibouti, Dominican Republic, England, Estonia, Ethiopia, France, Germany, Ghana, Guinea, Guyana, India, Indonesia, Ireland, Israel, Italy, Ivory Coast, Japan, Kazakhstan, Korea (Republic of), Kyrgyzstan, Laos, Liberia, Lithuania, Malaysia, Mali, Mauritania, Mexico, Netherlands, New Zealand, North Macedonia, Norway, Peru, Philippines, Poland, Russian Federation, Saudi Arabia, Singapore, South Africa, Spain, Suriname, Sweden, Switzerland, Taiwan, Thailand, Turkey, United Arab Emirates, 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 2020.