# UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Washington, D.C. 20549

<b>FORM</b>	SD
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**Specialized Disclosure Report** 

# **FABRINET**

(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) Not applicable (IRS Employer Identification No.)

c/o Intertrust Corporate Services (Cayman) Limited
190 Elgin Avenue
George Town
Grand Cayman
KY1-9005
Cayman Islands
(Address of principal executive offices)

Toh-Seng Ng Chief Financial Officer 66-81-948-1663

(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, 2017.

#### **Section 1—Conflict Minerals Disclosure**

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

A copy of the Conflict Minerals Report of Fabrinet ("Fabrinet" or the "Company") is filed as Exhibit 1.01 hereto and is publicly available at http://fabrinet.com/services/supply-chain.

The full text of Fabrinet's Conflict Minerals Sourcing Policy is publicly available at http://fabrinet.com/services/supply-chain.

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**

Exhibit No.	Description

1.01 Fabrinet Conflict Minerals Report for Calendar Year 2017.

SIGN	ΙAΊ	ʻUR	ES

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/ Toh-Seng Ng May 30, 2018

Toh-Seng Ng Executive Vice President, Chief Financial Officer (Date)

# FABRINET CONFLICT MINERALS REPORT YEAR ENDED DECEMBER 31, 2017

#### 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 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, advanced packaging, integration, final assembly and test. 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) or origin of those ores 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 such 3TG metals in our supply chain; however, we believe the smelters and refiners of the 3TG contained in the products we manufacture for our customers are best situated to identify the sources and countries of origin of the 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 2017.

#### 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 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 <a href="http://fabrinet.com/services/supply-chain">http://fabrinet.com/services/supply-chain</a>.
  - · 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 company website at <a href="http://fabrinet.com/services/supply-chain">http://fabrinet.com/services/supply-chain</a>.

#### **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 benefitted 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/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 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 actually are in our supply chain or Covered Products.

Mineral	Verified Smelters
Gold	Sungeel HiMetal Co., Ltd.
Gold	Pease & Curren
Gold	Morris and Watson Gold Coast
Gold	L'Orfebre S.A.
Gold	Degussa Sonne / Mond Goldhandel GmbH
Gold	Sai Refinery
Gold	GCC Gujrat Gold Centre Pvt. Ltd.
Gold	Sudan Gold Refinery
Gold	Fidelity Printers and Refiners Ltd.
Gold	Universal Precious Metals Refining Zambia
Gold	Abington Reldan Metals, LLC
Gold	State Research Institute Center for Physical Sciences and Technology
Gold	Planta Recuperadora de Metales SpA
Gold	Marsam Metals
Gold	Italpreziosi
Gold	HeeSung Metal Ltd.
Gold	Safimet S.p.A
Gold	Navoi Mining and Metallurgical Combinat

Gold CCR Refinery—Glencore Canada Corporation Gold Yamakin Co., Ltd. Gold Rand Refinery (Pty) Ltd. Gold **AURA-II** Gold Remondis Argentia B.V. Gold HwaSeong CJ Co., Ltd. Gold **Bangalore Refinery** Modeltech Sdn Bhd Gold **SAAMP** Gold Gold Safina a.s. TOO Tau-Ken-Altyn Gold Gold AU Traders and Refiners Gold Morris and Watson Gold Atasay Kuyumculuk Sanayi Ve Ticaret A.S. KGHM Polska Miedz Spolka Akcyjna Gold Gold Tongling Nonferrous Metals Group Co., Ltd. Gold So Accurate Group, Inc. Shandong Tiancheng Biological Gold Industrial Co., Ltd. Gold Gold SAMWON METALS Corp. Gold Sabin Metal Corp. Gold Penglai Penggang Gold Industry Co., Ltd. Gold Luoyang Zijin Yinhui Gold Refinery Co., Ltd. Gold Kazakhmys Smelting LLC Gold Hunan Chenzhou Mining Co., Ltd. Gold Lingbao Jinyuan Tonghui Refinery Co., Ltd. Gold Lingbao Gold Co., Ltd. Gold Hangzhou Fuchunjiang Smelting Co., Ltd. Gold Guoda Safina High-Tech Environmental Refinery Co., Ltd. Guangdong Jinding Gold Limited Gold Refinery of Seemine Gold Co., Ltd. Gold Chugai Mining Gold Gold Cendres + Metaux S.A. Caridad Gold Gold Great Wall Precious Metals Co., Ltd. of CBPM Gold Korea Zinc Co., Ltd. Gold Al Etihad Gold LLC Gold **Emirates Gold DMCC** Gold Daejin Indus Co., Ltd. Geib Refining Corporation Gold Gold WIELAND Edelmetalle GmbH

SAXONIA Edelmetalle GmbH

Gold

Gold Daye Non-Ferrous Metals Mining Ltd. Gold Yokohama Metal Co., Ltd. Gold Ohura Precious Metal Industry Co., Ltd. Gold Asaka Riken Co., Ltd. Gold Gold Refinery of Zijin Mining Group Co., Ltd. Gold Umicore Precious Metals Thailand Gold SOE Shyolkovsky Factory of Secondary Precious Metals Gold PX Precinox S.A. PT Aneka Tambang (Persero) Tbk Gold Nadir Metal Rafineri San. Ve Tic. A.S. Gold Jiangxi Copper Co., Ltd. Gold Gold Torecom Gold T.C.A S.p.A Gold Singway Technology Co., Ltd. Gold Sichuan Tianze Precious Metals Co., Ltd. Gold Schone Edelmetaal B.V. Gold Samduck Precious Metals Prioksky Plant of Non-Ferrous Metals Gold Gold OJSC Novosibirsk Refinery OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) Gold Gold Ogussa Osterreichische Gold und Silber-Scheideanstalt GmbH Gold Moscow Special Alloys Processing Plant Gold MMTC-PAMP India Pvt., Ltd. Gold Kyrgyzaltyn JSC Gold Kazzinc Gold JSC Uralelectromed Gold Japan Mint Gold Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. Almalyk Mining and Metallurgical Complex (AMMC) Gold DSC (Do Sung Corporation) Gold Gold DODUCO Contacts and Refining GmbH Gold JSC Ekaterinburg Non-Ferrous Metal Processing Plant Advanced Chemical Company Gold Gold Eco-System Recycling Co., Ltd. Gold Valcambi S.A. Gold Metalor Technologies (Singapore) Pte., Ltd. Gold Aurubis AG Gold Istanbul Gold Refinery C. Hafner GmbH + Co. KG Gold Gold Bangko Sentral ng Pilipinas (Central Bank of the Philippines)

Gold

Chimet S.p.A.

Gold	PAMP S.A.
Gold	Metalor Technologies (Suzhou) Ltd.
Gold	Yunnan Copper Industry Co., Ltd.
Gold	L'azurde Company for Jewelry
Gold	Kaloti Precious Metals
Gold	Tony Goetz NV
Gold	Umicore Brasil Ltda.
Gold	Republic Metals Corporation
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.
Gold	Boliden AB
Gold	Heimerle + Meule GmbH
Gold	Allgemeine Gold-und Silberscheideanstalt A.G.
Gold	Mitsubishi Materials Corporation
Gold	JX Nippon Mining & Metals Co., Ltd.
Gold	Sumitomo Metal Mining Co., Ltd.
Gold	SEMPSA Joyeria Plateria S.A.
Gold	Aida Chemical Industries Co., Ltd.
Gold	Tokuriki Honten Co., Ltd.
Gold	Mitsui Mining and Smelting Co., Ltd.
Gold	Ishifuku Metal Industry Co., Ltd.
Gold	LS-NIKKO Copper Inc.
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.
Gold	Metalor Technologies (Hong Kong) Ltd.
Gold	The Refinery of Shandong Gold Mining Co., Ltd.
Gold	Solar Applied Materials Technology Corp.
Gold	Matsuda Sangyo Co., Ltd.
Gold	Tanaka Kikinzoku Kogyo K.K.
Gold	Metalor USA Refining Corporation
Gold	Kennecott Utah Copper LLC
Gold	Royal Canadian Mint
Gold	KYSHTYM COPPER-ELECTROLYTIC PLANT ZAO
Gold	Shandong Yanggu Xiangguang Co. Ltd.
Gold	OJSC Kolyma Refinery
Gold	N.E.Chemcat Corporation
Gold	Korea Metal Co., Ltd.
Gold	K.A Rasmussen as
Gold	Ferro Corporation
Gold	Faggi Enrico S.p.A.
Gold	China Gold Deal Investment Co., Ltd.

Gold

Bauer Walser AG

Gold Shandong zhongkuang group co., LTD
Gold Super Dragon Technology Co., Ltd.

Gold Shenzhen Zhonghenglong Real Industry Co., Ltd.

Gold Shandong Humon Smelting Co., Ltd.
Gold Henan Yuguang Gold & Lead Co., Ltd.

Gold Asahi Refining USA Inc.

Gold Materion

Gold Argor-Heraeus S.A.

Gold AngloGold Ashanti Corrego do Sitio Mineracao

Gold Elemetal Refining, LLC

Gold Heraeus Precious Metals GmbH & Co. KG

Gold Asahi Refining Canada Ltd.
Gold Heraeus Metals Hong Kong Ltd.

Gold Western Australian Mint (T/a The Perth Mint)

Gold Nihon Material Co., Ltd.

Gold Kojima Chemicals Co., Ltd.

Gold Asahi Pretec Corp.

Gold Dowa

Gold Umicore S.A. Business Unit Precious Metals Refining

Gold Metalor Technologies S.A.

Gold United Precious Metal Refining, Inc.

Tantalum Power Resources Ltd.
Tantalum E.S.R. Electronics
Tantalum Asaka Riken Co., Ltd.

Tantalum Tranzact, Inc.

Tantalum Hi-Temp Specialty Metals, Inc.

Tantalum Yichun Jin Yang Rare Metal Co., Ltd.

Tantalum Duoluoshan

Tantalum XinXing HaoRong Electronic Material Co., Ltd.

Tantalum Resind Industria e Comercio Ltda.

Tantalum QuantumClean

Tantalum King-Tan Tantalum Industry Ltd.

Tantalum Jiujiang Zhongao Tantalum & Niobium Co., Ltd.Tantalum Jiangxi Dinghai Tantalum & Niobium Co., Ltd.

Tantalum Telex Metals

Tantalum Solikamsk Magnesium Works OAO

Tantalum RFH Tantalum Smeltery Co., Ltd./Yanling Jincheng Tantalum & Niobium Co., Ltd.

Tantalum KEMET Blue Metals

Tantalum FIR Metals & Resource Ltd.

Tantalum Metallurgical Products India Pvt., Ltd.

Tantalum JiuJiang JinXin Nonferrous Metals Co., Ltd.

Tantalum LSM Brasil S.A.

Tantalum Guangdong Zhiyuan New Material Co., Ltd.

Tantalum D Block Metals, LLC

Tantalum Mineracao Taboca S.A.

Tantalum Hengyang King Xing Lifeng New Materials Co., Ltd.

Tantalum Global Advanced Metals Aizu

Tantalum NPM Silmet AS

Tantalum Jiangxi Tuohong New Raw Material

Tantalum Exotech Inc.

Tantalum Taki Chemical Co., Ltd.

Tantalum H.C. Starck Tantalum and Niobium GmbH

Tantalum Global Advanced Metals Boyertown

Tantalum H.C. Starck Hermsdorf GmbH

Tantalum H.C. Starck Ltd.

Tantalum H.C. Starck Co., Ltd.

Tantalum H.C. Starck Smelting GmbH & Co. KG

Tantalum Zhuzhou Cemented Carbide Group Co., Ltd.

Tantalum H.C. Starck Inc.

Tantalum Ningxia Orient Tantalum Industry Co., Ltd.

Tantalum F&X Electro-Materials Ltd.

Tantalum Guangdong Rising Rare Metals-EO Materials Ltd.

Tantalum Plansee SE Reutte
Tantalum Plansee SE Liezen

Tantalum H.C. Starck GmbH Laufenburg

Tantalum Mitsui Mining and Smelting Co., Ltd.

Tantalum Ulba Metallurgical Plant JSC

Tantalum Jiujiang Nonferrous Metals Smelting Company Limited

Tantalum KEMET Blue Powder

Tantalum Changsha South Tantalum Niobium Co., Ltd.

Tin PT Lautan Harmonis Sejahtera

Tin Guangdong Hanhe Non-Ferrous Metal Co., Ltd.

Tin PT Bangka Prima Tin
Tin Phoenix Metal Ltd.
Tin Modeltech Sdn Bhd

Tin Guanyang Guida Nonferrous Metal Smelting Plant

Tin Gejiu Jinye Mineral Company

Tin HuiChang Hill Tin Industry Co., Ltd.

Tin PT Kijang Jaya Mandiri
Tin PT O.M. Indonesia
Tin CV Tiga Sekawan

Tin CNMC (Guangxi) PGMA Co., Ltd.

Tin Huichang Jinshunda Tin Co., Ltd. Tin Gejiu Kai Meng Industry and Trade LLC Tin Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company Tin An Vinh Joint Stock Mineral Processing Company Tuyen Quang Non-Ferrous Metals Joint Stock Company Tin Tin Nghe Tinh Non-Ferrous Metals Joint Stock Company Tin Estanho de Rondonia S.A. Gejiu Fengming Metallurgy Chemical Plant Tin CV Ayi Jaya Tin Tin PT Karimun Mining Tin CV Dua Sekawan Tin PT ATD Makmur Mandiri Jaya Tin PT Tommy Utama Tin Dowa PT Sumber Jaya Indah Tin Tin O.M. Manufacturing (Thailand) Co., Ltd. Magnu's Minerais Metais e Ligas Ltda. Tin Metallo Spain S.L.U. Tin Tin CV Gita Pesona Resind Industria e Comercio Ltda. Tin VQB Mineral and Trading Group JSC Tin Tin O.M. Manufacturing Philippines, Inc. Tin Metallic Resources, Inc. PT Cipta Persada Mulia Tin Tin Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. PT Wahana Perkit Jaya Tin An Thai Minerals Co., Ltd. Tin Tin PT Sukses Inti Makmur PT Prima Timah Utama Tin Soft Metais Ltda. Tin Tin Melt Metais e Ligas S.A. Tin Rui Da Hung PT Babel Inti Perkasa Tin Tin PT Bukit Timah Nankang Nanshan Tin Manufactory Co., Ltd. Tin Tin Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. Tin Gejiu Zili Mining and Metallurgy Co., Ltd. Tin PT Aries Kencana Sejahtera CV Venus Inti Perkasa Tin

PT Artha Cipta Langgeng

PT Panca Mega Persada

Tin Tin

Tin	CV Serumpun Sebalai
Tin	Jiangxi Ketai Advanced Material Co., Ltd.
Tin	PT Eunindo Usaha Mandiri
Tin	PT Justindo
Tin	PT Belitung Industri Sejahtera
Tin	PT DS Jaya Abadi
Tin	China Tin Group Co., Ltd.
Tin	Mitsubishi Materials Corporation
Tin	PT Sariwiguna Binasentosa
Tin	White Solder Metalurgia e Mineracao Ltda.
Tin	PT Inti Stania Prima
Tin	Cooperativa Metalurgica de Rondonia Ltda.
Tin	CV United Smelting
Tin	Fenix Metals
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.
Tin	PT REFINED BANGKA TIN
Tin	PT Timah (Persero) Tbk Kundur
Tin	EM Vinto
Tin	PT Tinindo Inter Nusa
Tin	PT Mitra Stania Prima
Tin	PT Bangka Tin Industry
Tin	Yunnan Tin Company Limited
Tin	PT Stanindo Inti Perkasa
Tin	PT Timah (Persero) Tbk Mentok
Tin	Thaisarco
Tin	Metallo Belgium N.V.
Tin	PT Menara Cipta Mulia
Tin	Zhongshan Jinye Smelting Co., Ltd
Tin	Yifeng Tin Industry (Chenzhou) Co Ltd
Tin	Shang You Xin Mao Tin Company Ltd
Tin	Univertical International
Tin	UNIFORCE METAL INDUSTRIAL CORP.
Tin	Tongding Metal Material Co., Ltd.
Tin	Tamura Corporation
Tin	Taicang City Nancang Metal Material Co., Ltd
Tin	Sumitomo Metal Mining Co., Ltd.
Tin	Senju Metal Industry Co., Ltd.
Tin	Samhwa Non-Ferrous Metal. Inc Co., Ltd.
Tin	Rahman Hydrulic Tin Sdn Bhd

PT Yinchendo Mining Industry

Tin

Tin PT Seirama Tin investment
Tin PT Pelat Timah Nusantara Tbk

Tin PT Koba Tin

Tin

Tin PT HP Metals Indonesia
Tin PT Fang Di MulTindo

PT BilliTin Makmur Lestari

Tin PT Bangka Timah Utama Sejahtera

Tin PT Bangka Putra Karya Tin PT Bangka Kudai Tin

Tin PT Babel Surya Alam Lestari Tin PT Alam Lestari Kencana

Tin Poongsan

Tin Novosibirsk Processing Plant Ltd.

Tin Minmetals Ganzhou Tin Co. Ltd

Tin Metahub Industries Sdn. Bhd.

Tin Linwu Xianggui Ore Smelting Co., Ltd.

Tin International Wire Group, Inc

Tin Imperial Zinc

Tin Hezhou Jinwei Tin Co., Ltd

Tin Grant Manufacturing and Alloying

Tin Global Advanced Metals

Tin Galloo N.V.

Tin Feinhütte Halsbrücke GmbH

Tin CV Makmur Jaya
Tin CIMSA, S.A.

Tin A.E.B. International, Inc.

Tin 5N Plus

Tin PT Tirus Putra Mandiri

Tin Hunan Xianghualing Tin Co. ltd

Tin Super Ligas

Tin Operaciones Metalurgical S.A.

Tin Mineracao Taboca S.A.

Tin Malaysia Smelting Corporation (MSC)

Tin Minsur
Tin Alpha

Tungsten Dayu Jincheng Tungsten Industry Co., Ltd.Tungsten Hunan Litian Tungsten Industry Co., Ltd.

Tungsten Dayu Weiliang Tungsten Co., Ltd.Tungsten Ganzhou Yatai Tungsten Co., Ltd.

Tungsten Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.

Tungsten Jiangxi Dayu Longxintai Tungsten Co., Ltd.

Tungsten ACL Metais Eireli Tungsten Asia Tungsten Products Vietnam Ltd. Tungsten Ganzhou Jiangwu Ferrotungsten Co., Ltd. Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd. Tungsten Jiangxi Yaosheng Tungsten Co., Ltd. Tungsten Tungsten Xinhai Rendan Shaoguan Tungsten Co., Ltd. Tungsten Vietnam Youngsun Tungsten Industry Co., Ltd. Tungsten Malipo Haiyu Tungsten Co., Ltd. Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. Tungsten Tungsten Jiangxi Xinsheng Tungsten Industry Co., Ltd. Tungsten Kennametal Fallon Tungsten Hunan Chenzhou Mining Co., Ltd. Jiangwu H.C. Starck Tungsten Products Co., Ltd. Tungsten Tungsten Hydrometallurg, JSC Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji Tungsten Jiangxi Gan Bei Tungsten Co., Ltd. Tungsten Tungsten Japan New Metals Co., Ltd. Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd. Tungsten Tungsten South-East Nonferrous Metal Company Limited of Hengyang City Tungsten Philippine Chuangxin Industrial Co., Inc. H.C. Starck Smelting GmbH & Co. KG Tungsten Tungsten Woltech Korea Co., Ltd. Tungsten Moliren Ltd. Unecha Refractory metals plant Tungsten Tungsten Ganzhou Seadragon W & Mo Co., Ltd. Fujian Jinxin Tungsten Co., Ltd. Tungsten Guangdong Xianglu Tungsten Co., Ltd. Tungsten Tungsten Wolfram Bergbau und Hutten AG Chenzhou Diamond Tungsten Products Co., Ltd. Tungsten Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC Tungsten Tungsten Niagara Refining LLC Tungsten Tejing (Vietnam) Tungsten Co., Ltd. Tungsten Hunan Chunchang Nonferrous Metals Co., Ltd. Tungsten A.L.M.T. TUNGSTEN Corp. Tungsten Global Tungsten & Powders Corp.

H.C. Starck Tungsten GmbH

Xiamen Tungsten Co., Ltd.

Kennametal Huntsville

Xiamen Tungsten (H.C.) Co., Ltd.

Ganzhou Huaxing Tungsten Products Co., Ltd.

Luoyang Mudu Tungsten & Molybdenum Technology Co., Ltd.

Chongyi Zhangyuan Tungsten Co., Ltd.

Ganzhou Haichuang Tungsten Co., Ltd.

Tungsten Tungsten

Tungsten

Tungsten

Tungsten Tungsten

Tungsten Tungsten

#### VI. Countries of origin identified:

American Samoa, Andorra, Australia, Australia, Belgium, Bolivia, Brazil, Canada, Chile, China, Czech Republic, Estonia, France, Germany, India, Indonesia, Italy, Japan, Kazakhstan, Korea (Republic of), Kyrgyzstan, Macedonia, Malaysia, Mexico, Netherlands, New Zealand, Peru, Philippines, Poland, Russian Federation, Rwanda, Saudi Arabia, Singapore, South Africa, Spain, Sweden, Switzerland, Taiwan, Thailand, Turkey, United Arab Emirates, United States, Uzbekistan, Vietnam, Zambia, 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 ores 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 product 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 2017.