# UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Washington, D.C. 20549

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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, 2013.

### **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 1.02 hereto and is publicly available at http://www.fabrinet.com/conflict\_minerals\_report.html.

The full text of Fabrinet's Conflict Minerals Policy is publicly available at http://www.fabrinet.com/conflict\_minerals\_statement.html.

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 1.02 to this Form SD.

### Section 2 - Exhibits

### Item 2.01 Exhibits

Exhibit

No. Description

1.02 Fabrinet Conflict Minerals Report for Calendar Year 2013.

## **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/ Toh-Seng Ng 5/30/14
Toh-Seng Ng (Date)
Executive Vice President, Chief Financial Officer

# FABRINET CONFLICT MINERALS REPORT YEAR ENDED DECEMBER 31, 2013

#### 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 Fabrinet products 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 undertaken 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 extremely limited at this time; this situation is not unique to us. We have taken steps we believe to be reasonable under the circumstances to identify the applicable smelters and refiners of such 3TG metals in our supply chain; however, we believe that the smelters and refiners of the 3TG contained in our products are best situated to identify the sources and countries of origin of the 3TG.

We do not directly manufacture products but "contract to manufacture" from our suppliers branded and generic products containing 3TG. The efforts were undertaken on the exclusive and/or privately-branded products sourced directly by, and manufactured for, us in 2013.

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

Direct suppliers were asked to provide answers to the Electronic Industry Citizenship Coalition-Global e-Sustainability Initiative (EICC-GeSI) Conflict Minerals Common Reporting Template reflecting Fabrinet's position on the supply chain. The EICC-GeSI Conflict Minerals Common Reporting Template 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.

We reviewed questionnaires received and reviewed them for completeness and consistency of answers. Suppliers were required to provide corrections and clarifications where needed.

As such, 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 OECD (2011), *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* and the supplements on tin, tantalum, tungsten and gold (the "Guidance"). The five step framework consists of:

- (1) Establish strong company management systems
  - We have created a Conflict Mineral Task Force led by our Supply Chain Management organization to implement our Conflict Mineral Sourcing Policy
  - We have published our Conflict Mineral Sourcing Policy, a copy of which is publicly available at our website <a href="http://www.fabrinet.com/conflict\_minerals\_statement.html">http://www.fabrinet.com/conflict\_minerals\_statement.html</a>
  - We have communicated our policy on Conflict Minerals to 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 conducted supplier surveys using the EICC-GeSI Conflict Minerals Common Reporting Template ("CMRT")
  - We reviewed CMRT received for completeness and consistency of answers. Suppliers were required to provide corrections and clarifications where needed
  - · We compared smelters and refiners identified by suppliers to the CFSI list of validated conflict free facilities
- (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)
  - 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 supported the development and implementation of independent third party audits of smelter/refiner's sourcing through our policy and procurement practices that encourage suppliers to purchase materials from audited smelters/refiners
  - We supported EICC Conflict Free Sourcing Initiative which directly supports and implements third party audits of smelters/refiners
- (5) Report on supply chain due diligence
  - We communicated our conflict mineral report on our company website at <a href="http://www.fabrinet.com/conflict\_minerals\_report.html">http://www.fabrinet.com/conflict\_minerals\_report.html</a>

We implemented appropriate elements of the Guidance 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.

### **IV.** Product Determination

We conducted survey with our identified suppliers and approximately 90% of our suppliers responded. We received inconclusive data from our direct suppliers and materials sources indicating that the 3TG originated in the Covered Countries.

### V. Product Description

Metal

Gold

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.

We compared smelters and refiners identified by our suppliers to the CFSI list of validated conflict free facilities. Of the 224 smelters/refiners identified by our suppliers, 181 of those smelters/refiners are in the CFSI list.

Below is the identified smelters and refineries list:

**Smelter Names** 

	) ()
Gold	Aida Chemical Industries Co. Ltd.
Gold	Allgemeine Gold- und Silberscheideanstalt A.G.
Gold	Almalyk Mining and Metallurgical Complex (AMMC)
Gold	AngloGold Ashanti Mineração Ltda
Gold	Argor-Heraeus SA
Gold	Asahi Pretec Corporation
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	Caridad
Gold	Cendres & Métaux SA
Gold	Central Bank of the DPR of Korea
Gold	Changzhou Chemical Research Institute Co. Ltd.
Gold	Chimet SpA
Gold	China Gold
Gold	China National Gold Group (Henan)
Gold	Chugai Mining
Gold	Codelco
Gold	Cookson Group

Academy Precious Metals (China) Co. LTD

Gold CV Nurjanah
Gold Daejin Indus Co. Ltd
Gold DaeryongENC
Gold Do Sung Corporation

Gold Dowa

Gold FSE Novosibirsk Refinery

Gold Guangdong macro jin precious metal smelting plant

Gold H.C. Starck GmbH
Gold Harima Smelter
Gold Harmony Gold Refinery

Gold HeeSung

Gold

Gold Heesung Metal Ltd
Gold Heimerle + Meule GmbH

Heraeus (zhaoyuan)Precious Metal Materials Co., Ltd.

Gold Heraeus Ltd Hong Kong Gold Heraeus Ltd. – Canada

Gold Heraeus Ltd. - USA Heraeus Precious Metals, Inc, USA

Gold Heraeus Precious Metals GmbH & Co. KG

Gold Heraeus Zhaoyuan (Changshu) Electronic Material Co., Ltd.

Gold Hon Hai

Gold Hwasung CJ Co. Ltd

Gold Imicore / Unicore SA Umicore SA Business Unit Precious Metals Refining Gold Inner Mongolia Qiankun Gold and Silver Refinery Share Company Limited

Gold Ishifuku Metal Industry Co., Ltd.

Gold Istanbul Gold Refinery

Gold Japan Mint

Gold Japan Pure Chemcial

Gold Jiangxi Copper Company Limited
Gold Jinfeng Gold Mine Smelter
Gold Johnson Matthey Inc
Gold Johnson Matthey Limited

Gold JSC Ekaterinburg Non-Ferrous Metal Processing Plant

Gold JSC Uralectromed

Gold JX Nippon Mining & Metals Co., Ltd

Gold Kazzinc Ltd

Gold Kennecott Utah Copper Gold Kojima Chemicals Co. Ltd Gold Korea Metal Co. Ltd

Gold Kunshan Jinli chemical industry reagents co.,Ltd.

Gold Kyrgyzaltyn JSC

Gold L' azurde Company For Jewelry

Gold La Caridad

Gold London Metal Exchange (LME)

Gold LS- Nikko, Japan Gold LS-Nikko Copper Inc

Gold Malaysia Smelting Corporation Berhad

Gold Materion

Gold Matsuda Sangyo Co. Ltd

Gold Metalor Technologies (Hong Kong) Ltd

Gold Metalor Technologies SA

Gold Metalor USA Refining Corporation

Gold Met-Mex Peñoles, S.A.

Gold Minsur

Gold Mitsubishi Materials Corporation
Gold Mitsui Mining and Smelting Co., Ltd.
Gold Moscow Special Alloys Processing Plant
Gold Nadir Metal Rafineri San. Ve Tic. A.Ş.
Gold Navoi Mining and Metallurgical Combinat

Gold Nihon Material Co. LTD
Gold Ohio Precious Metals LLC.

Gold OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastvetmet)

Gold OJSC Kolyma Refinery

Gold PAMP SA

Gold Pan Pacific Copper Co. LTD

Gold Prioksky Plant of Non-Ferrous Metals Gold PT Aneka Tambang (Persero) Tbk

Gold PT Tambang Timah
Gold PX Précinox SA
Gold Rand Refinery (Pty) Ltd
Gold Royal Canadian Mint
Gold Sabin Metal Corp.
Gold SAMWON Metals Corp.
Gold Schone Edelmetaal

Gold SEMPSA Joyeria Plateria SA

Gold Shandong Zhaojin Gold & Silver Refinery Co. Ltd Gold SOE Shyolkovsky Factory of Secondary Precious Metals

Gold Solar Applied Materials Technology Corp.

Gold Sumitomo Metal Mining Co. Ltd.

Gold Suzhou Xingrui Noble
Gold Tanaka Kikinzoku Kogyo K.K.

Gold The Great Wall Gold and Silver Refinery of China Gold The Refinery of Shandong Gold Mining Co. Ltd

Gold Tokuriki Honten Co. Ltd

Gold Torecom

Gold Umicore Brasil Ltda

Gold Umicore SA Business Unit Precious Metals Refining

Gold United Precious Metal Refining, Inc.

Gold Valcambi SA

Gold Western Australian Mint trading as The Perth Mint

Gold Xstrata Canada Corporation Gold Yokohama Metal Co Ltd Gold Yunnan Chengfeng

Gold Yunnan Tin Company Limited

Gold Zhongyuan Gold Smelter of Zhongjin Gold Corporation

Gold Zijin Mining Group Co. Ltd

Metal Smelter Names

Tantalum Conghua Tantalum and Niobium Smeltry

Tantalum Duoluoshan
Tantalum Exotech Inc.
Tantalum F&X

Tantalum Gannon & Scott

Tantalum Global Advanced Metals
Tantalum H.C. Starck GmbH

Tantalum Hi-Temp

Tantalum JiuJiang JinXin Nonferrous Metals Co. Ltd.

Tantalum JiuJiang Tambre Co. Ltd.
Tantalum Kemet Blue Powder
Tantalum Mitsui Mining & Smelting

Tantalum Ningxia Orient Tantalum Industry Co., Ltd.

Tantalum Plansee Tantalum RFH

Tantalum Solikamsk Metal Works

Tantalum Taki Chemicals
Tantalum Tantalite Resources

Tantalum Telex Tantalum Ulba

Tantalum Zhuzhou Cement Carbide

MetalSmelter NamesTinAIM

Tin ATI Tungsten Materials

Tin China Tin Lai Ben Smelter Co., Ltd. Tin CNMC (Guangxi) PGMA Co. Ltd.

Tin CNMC (Guar Tin Cookson Tin Cooper Santa

Tin CV Duta Putra Bangka

Tin CV JusTindo
Tin CV Makmur Jaya
Tin CV Prima Timah Utama
Tin CV Serumpun Sebalai
Tin CV United Smelting
Tin Daewoo International

Tin EM Vinto

Tin Feinhütte Halsbrücke GmbH

Tin Fenix Metals

Tin Geiju Non-Ferrous Metal Processing Co. Ltd.

Tin Gejiu Zi-Li Tin Gold Bell Group

Tin Huichang Jinshunda Tin Co. Ltd

Tin Jiangxi Nanshan

Tin Linwu Xianggui Smelter Co

Tin Liuzhou China Tin

Tin Malaysia Smelting Corporation (MSC)

Tin Metallic Material Branch of Guangxi China Tin Group Co. Ltd.

Tin Metallo Chimique Tin Mineração Taboca S.A.

Tin Minmetals Ganzhou Tin Co. Ltd.

Tin Minsur

Tin Mitsubishi Materials Corporation
Tin Novosibirsk Integrated Tin Works

Tin OMSA

Tin PT Alam Lestari Kencana
Tin PT Artha Cipta Langgeng
Tin PT Babel Inti Perkasa
Tin PT Babel Surya Alam Lestari
Tin PT Bangka Kudai Tin
Tin PT Bangka Putra Karya

Tin PT Bangka Timah Utama Sejahtera Tin PT Belitung Industri Sejahtera Tin PT BilliTin Makmur Lestari Tin PT Bukit Timah Tin PT DS Jaya Abadi

Tin PT Eunindo Usaha Mandiri Tin PT Fang Di MulTindo Tin PT HP Metals Indonesia

Tin PT Koba Tin

Tin PT Mitra Stania Prima
Tin PT Refined Banka Tin
Tin PT Sariwiguna Binasentosa
Tin PT Stanindo Inti Perkasa
Tin PT Sumber Jaya Indah
Tin PT Tambang Timah

Tin PT Timah

Tin PT Timah Nusantara Tin PT Tinindo Inter Nusa

Tin PT Yinchendo Mining Industry

Tin Thaisarco

Tin White Solder Metalurgia Tin Yunnan Chengfeng

Tin Yunnan Tin Company Limited

MetalSmelter NamesTungstenA.L.M.T. Corp.

Tungsten ATI Tungsten Materials

TungstenChaozhou Xianglu Tungsten Industry Co LtdTungstenChina Minmetals Nonferrous Metals Co LtdTungstenChongyi Zhangyuan Tungsten Co LtdTungstenDayu Weiliang Tungsten Co., Ltd.

Tungsten Ganzhou Grand Sea W & Mo Group Co Ltd

Tungsten Ganzhou Huaxing Tungsten
Tungsten Global Tungsten & Powders Corp

Tungsten HC Starck GmbH

Tungsten Hitachi Metals, Ltd., Yasugi Works Tungsten Hunan Chenzhou Mining Group Co

Tungsten Hunan Chun-Chang Nonferrous Smelting & Concentrating Co., Ltd.

Tungsten Japan New Metals Co Ltd

Tungsten Jiangxi Rare Earth & Rare Metals Tungsten Group Corp

Tungsten Jiangxi Tungsten Industry Group Co Ltd Tungsten Mitsui Mining & Smelting Co., Ltd

Tungsten Nanchang Cemented Carbide Limited Liability Company

Tungsten Sandvik Material Technology
Tungsten Wolfram Bergbau und Hütten AG

Tungsten Wolfram Company CJSC

Tungsten Xiamen Golden Egret Speical Alloy Co., Ltd

Tungsten Xiamen Tungsten Co Ltd

Tungsten Zhuzhou Cemented Carbide Group Co Ltd

Countries of origin of the conflict minerals these facilities process are believe to include:

Argentina, Armenia, Australia, Australia, Belgium, Bolivia, Brazil, Bulgaria, Burundi, Cambodia, Canada, Chile, China, Colombia, DRC, Ecuador, Egypt, Eritrea, Estonia, Ethiopia, Fiji, Finland, Georgia, Germany, Ghana, Guatemala, Honduras, Hong Kong, India, Indonesia, Japan, Kazakhstan, Republic of Korea, Laos People's Democratic Republic, Malaysia, Mali, Mexico, Mongolia, Mozambique, New Zealand, Nicaragua, Niger, Nigeria, Panama, Papua New Guinea, Peru, Philippines, Portugal, Russian Federation, Rwanda, Saudi Arabia, Singapore, Solomon Islands, Somalia, South Africa, Spain, South Sudan, Suriname, Switzerland, Taiwan, United Republic of Tanzania, Thailand, Turkey, United Kingdom, United States, Uruguay, Uzbekistan, Venezuela, Vietnam and Zimbabwe.

### VI. 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 suppliers will be reviewed for conflict minerals conformance during initial business reviews. 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.

# VII. Independent Private Sector Audit

Not required for calendar year 2013.