**UNITED STATES SECURITIES AND EXCHANGE COMMISSION**

**Washington, D.C. 20549**



**Form SD**



**SPECIALIZED DISCLOSURE REPORT**



**Marvell Technology Group Ltd.**

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



**Bermuda**

**000-30877**

**77-0481679**

**(State or other jurisdiction of**

**(Commission File No.)**

**(I.R.S. Employer Identification No.)**

**incorporation or organization)**

**Canon’s Court**

**22 Victoria Street**

**Hamilton HM 12, Bermuda**

**(Address of principal executive offices)**

**Mitchell L. Gaynor**

**Executive Vice President, Chief Legal Officer**

**(408) 222-2500**

**and Secretary**

**(Name and telephone number, including area code, of**

**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 report applies:

* Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period January 1, 2015 to December 31, 2015.



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

**Conflict Minerals Disclosure**

A copy of the Conflict Minerals Report of Marvell Technology Group Ltd. (the “Company”) for the reporting period January 1, 2015 to December 31, 2015 is filed as Exhibit 1.01 to this specialized disclosure report on Form SD and is also available at the Company’s website at www.marvell.com under the heading “Investor Relations - Corporate Governance and Social Responsibility.”

**Item 1.02. Exhibit.**

As noted in Item 1.01, the Company is filing its Conflict Minerals Report as Exhibit 1.01 to this report.

**Item 2.01. Exhibit.**

The following exhibit is filed as a part of this report:

|  |  |  |
| --- | --- | --- |
| **Exhibit No.** |  | **Description** |
| 1.01 | Conflict Minerals Report of Marvell Technology Group Ltd. for the reporting period January 1, 2015 to December 31, | |
|  | 2015. | |
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**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.

Date: May 31, 2016

**Marvell Technology Group Ltd.**

By: /s/ David Eichler

David Eichler



Interim Chief Financial Officer

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|  |  |  |
| --- | --- | --- |
|  |  | **EXHIBIT INDEX** |
| **Exhibit No.** |  | **Description** |
| 1.01 |  | Conflict Minerals Report of Marvell Technology Group Ltd. for the reporting period January 1, 2015 to December 31, 2015. |
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Exhibit 1.01

**MARVELL TECHNOLOGY GROUP LTD.**

**CONFLICT MINERALS REPORT**

**(For the reporting period January 1, 2015 to December 31, 2015)**

This Conflict Minerals Report (this “Report”) of Marvell Technology Group Ltd. has been prepared pursuant to Rule 13p-1 and Form SD promulgated under the Securities Exchange Act of 1934 (collectively, the “Rule”) for the reporting period January 1, 2015 to December 31, 2015.

The Rule imposes certain reporting obligations on Securities and Exchange Commission (“SEC”) registrants whose manufactured products contain certain minerals that are necessary to the functionality or production of their products. The specified minerals, which are collectively referred to in this Report as “Conflict Minerals,” are gold, columbite-tantalite (coltan), cassiterite and wolframite, including their derivatives, which the SEC has currently limited to tantalum, tin and tungsten. The “Covered Countries” for purposes of the Rule and this Report are the Democratic Republic of the Congo, the Republic of the Congo, Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola. For purposes of this Report, references to “Marvell,” “we,” “us,” “our” or the “Company” mean Marvell Technology Group Ltd. and its consolidated subsidiaries.

To comply with the Rule, we conducted due diligence on the origin, source and chain of custody of the Conflict Minerals that were necessary to the functionality or production of the products that we manufactured or contracted to manufacture to ascertain whether these Conflict Minerals originated in a Covered Country and financed or benefited armed groups (as defined in Section 1, Item 1.01(d)(2) of Form SD) in any of these countries.

Pursuant to SEC guidance issued April 29, 2014 and the SEC order issued May 2, 2014, Marvell is not required to describe any of its products as “DRC conflict free” (as defined in Section 1, Item 1.01(d)(4) of Form SD), “DRC conflict undeterminable” (as defined in Section 1, Item 1.01(d)(5) of Form SD) or “having not been found to be ‘DRC conflict free,’” and therefore makes no conclusion in this regard in the report presented herein.

**I.** **Marvell and Its Products**

We are a fabless provider of fully integrated platform solutions. Our core strength is the development of complex system-on-a-chip (“SoC”), leveraging our extensive portfolio of intellectual property components in integrated hardware along with software that incorporates digital, analog and mixed-signal computing and communication technologies, designed and configured to provide an optimized solution compared to individual components. Our solutions have become increasingly integrated, with more and more components resulting in an all-in-one solution for a given customer’s end product. The demand for such highly integrated platform solutions is generally driven by technological changes and anticipation of the future needs of device manufacturers and end users, as well as, to an increasing extent, service providers, including cellular network carriers and Internet based applications providers.

Our current product offerings are primarily in three broad end markets: storage, networking, and mobile and wireless.

***Storage Products***. We offer a broad range of integrated data storage products that operate across all major technologies. Our storage products include:

hard disk drive controllers, solid-state drive controllers, and integrated SoCs for storage markets.

***Networking Products***. We offer several families of products supporting the build-out of new network architectures for residential, enterprise andservice provider networks. These products include Ethernet solutions, embedded communication processors, network processors and a variety of platform and SoC solutions, as well as switches, transceivers and other connectivity products.

***Other Products***. We also offer cloud services products for the cloud services and infrastructure end market and a range of silicon and software solutionsfor the Internet of Things (IoT) end market, including our Kinoma hardware products and other products designed to enable the next generation of connected consumer platforms. Due to the fact that (i) the Company began selling our Kinoma hardware products commercially during calendar year 2015, and (ii) the manufacturing of such products was completed during calendar year 2015, this Report is the Company’s first Conflict Minerals Report that includes our Kinoma hardware products.

***Products Covered by this Report***. All of the products contracted by the Company to be manufactured for which manufacturing was completed duringcalendar year 2015 consisted of integrated circuits or products incorporating integrated circuits and contained small amounts of gold, tantalum, tin and tungsten. These Conflict Minerals are necessary to the functionality or production of each of our integrated circuit products and components. For purposes of this Report, therefore, “products” refers to the products in the product categories listed above for which the manufacturing was completed during calendar year 2015, and “suppliers” refers to our product suppliers.

**II.** **Manufacturing and Supply Chain**

We employ a “fabless” model for the manufacture, assembly and testing of our integrated circuits. We do not own or operate foundries or manufacturing facilities. We outsource our integrated circuit manufacturing to third-party foundries, primarily in Asia. We also outsource all product assembly, packaging and testing of our products to several assembly and test subcontractors in Asia.

As a result of our fabless model, we are a downstream actor in a complex supply chain. Our semiconductor products typically contain many parts and components obtained from a global network of direct suppliers. Furthermore, we often do not have meaningful leverage over upstream actors in the supply chain, as there are multiple tiers of suppliers between us and the ultimate sources of the raw materials used in the manufacture of our integrated circuit products and our other products that incorporate integrated circuits. Raw materials purchased by our direct and indirect suppliers contain gold, tantalum, tin and tungsten obtained from smelters and refiners that, in turn, source those minerals from traders and mines in various countries. Because we do not purchase materials directly from any of these processing facilities, we have relied on our direct suppliers, and on information available from industry sources, for purposes of this Report.

**III.** **Reasonable Country of Origin Inquiry**

We requested that our direct suppliers complete in full the Electronics Industry Citizenship Coalition (“EICC”)–Global e-Sustainability Initiative (“GeSI”) Conflict Minerals Reporting Template (the “CMRT”). The CMRT is designed to request from suppliers sufficient information regarding such suppliers’ practices with respect to the sourcing of Conflict Minerals to enable Marvell to comply with its requirements under the Rule.

Based on the results of our reasonable country of origin inquiry (“RCOI”), we have reason to believe that some of the Conflict Minerals present in our products may have originated in the Covered Countries. We are therefore required by the Rule to file with the SEC a Form SD and a Conflict Minerals Report as an exhibit thereto.

**IV.** **Due Diligence Design**

On the basis of the information obtained as a result of our RCOI, we conducted a broader due diligence investigation regarding the source and chain of custody of the Conflict Minerals contained in our products. There is significant overlap between our RCOI and due diligence processes, and the due diligence measures that we put in place are an extension of the CMRT-based RCOI process. These due diligence measures have been designed to conform, in all material respects, with the framework specified in the *Organization for Economic Co-operation and Development Due Diligence Guidance for Responsible* *Supply Chains of Minerals from Conflict-Affected and High Risk Areas, Second Edition*, including the related supplements on gold, tin, tantalum and tungsten(the “OECD Guidance”), specifically as the OECD Guidance pertains to downstream purchasers in the minerals supply chain. The OECD Guidance specifies a five-step framework for risk-based due diligence for responsible supply chains of minerals sourced from conflict-affected and high-risk areas.

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**V.** **Due Diligence Performed**

***Step 1: Establish Strong Company Management Systems.***

* Marvell maintains a Policy Statement on Conflict Minerals (the “Conflict Minerals Policy”), which provides that Marvell does not support the use of Conflict Minerals that are mined, transported or traded to fund human rights violations, social unrest, political repression or conflict or the use of metal derived from such Conflict Minerals. The Conflict Minerals Policy has been posted on our website at www.marvell.com under the heading “Investor Relations - Corporate Governance and Social Responsibility.”
* Marvell also maintains a Supplier Code of Conduct that, among other things, requires our suppliers to comply with the Conflict Minerals Policy, as well as with the Marvell Code of Ethics and the EICC Code of Conduct. The Supplier Code of Conduct is also posted on our website at www.marvell.com under the heading “Investor Relations - Corporate Governance and Social Responsibility.”
* The implementation of Marvell’s RCOI and the conducting of due diligence on the source and chain of custody of Marvell’s necessary Conflict Minerals are managed by a cross-functional Conflict Minerals Working Group under the direction of the Corporate Social Responsibility section of our Legal Department and with oversight by our Corporate Social Responsibility Committee (the “ CSR Committee”). The Conflict Minerals Working Group, comprised of subject matter experts from the Quality Systems group within our Operations organization and from our Legal Department, reports its activities to the CSR Committee at each of its meetings, and a representative of the CSR Committee reports at least once a year to the Audit Committee of our Board of Directors. The CSR Committee includes representatives from our Finance, Human Resources, Internal Audit, Legal, Operations and Sales Departments.
* We used a multi-layer approach to convey our supplier responsibility expectations to our direct suppliers. All of our direct suppliers have been provided with our Conflict Minerals Policy, Supplier Code of Conduct and Product and Manufacturing Specifications, and these documents are provided to new suppliers as part of our Conflict Minerals due diligence process. Marvell’s Product and Manufacturing Specifications contain provisions requiring that suppliers (i) comply with the Conflict Minerals Policy and the Supplier Code of Conduct and (ii) cooperate with Marvell in providing the information required by the CMRT, and also stipulate the consequences of breaching such provisions.
* We maintain a data retention policy to retain material conflict-minerals related records electronically for a period of at least five (5) years from the date of creation.
* We maintain our Marvell Concern Line, managed by an independent firm, which is available to our employees and the general public to enable them to anonymously ask questions regarding compliance and ethical issues and to report illegal and unethical activities, including general inquiries and grievances. Access to the Marvell Concern Line has been specifically extended to our direct suppliers.

***Step 2: Identify and Assess Risk in the Supply Chain.***

* + We received completed CMRTs from 100% of our direct suppliers and used our suppliers’ completed CMRTs to identify smelters and refiners and determine mine and country of origin.
* We are a member of the EICC and the EICC and GeSI Conflict-Free Sourcing Initiative (“CFSI”) working groups. As a



member of the CFSI, a leading industry program that helps its members to manage risk by improving supply chain transparency with respect to Conflict Minerals, Marvell has access to CFSI RCOI data that aids us in determining the mine or location of origin of the Conflict Minerals in our supply chain.

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* We cross-checked information received from our suppliers against data made available by these industry organizations and against additional information obtained from our customers and our own research to determine whether such facilities are validated by the Conflict-Free Sourcing Program (the “CFSP”) developed by the CFSI. When necessary, we engaged with smelters and refiners that we identified as high-risk to encourage such facilities to obtain a “conflict-free” designation from an independent, third-party audit program.

***Step 3: Design and Implement a Strategy to Respond to Identified Risks.***

* We have developed procedures for sending CMRTs to our suppliers on a bi-annual basis, reviewing their responses, consolidating the information in a central database and following up with the suppliers to address any incomplete or inconsistent responses.
* We surveyed our suppliers to gain further insights into their conflict minerals due diligence programs and processes, reviewing responses, assessing risk and following up with suppliers to address any inconsistencies, insufficient responses or insufficient documentation.
* We encouraged our suppliers to conduct investigations of any smelters or refiners that we identified as high-risk, and worked with our suppliers to mitigate such risk and, where unsuccessful, transition their processing to CFSP-validated smelters or refiners.
* We shared with our suppliers our expectations regarding sourcing from “conflict-free” designated smelters and refiners.
* When necessary, we directly encouraged the smelters and refiners from which our suppliers source Conflict Minerals to maintain their “conflict-free” designation, to complete action items required to obtain a “conflict-free” designation or to participate in an independent third-party audit program.
* If, on the basis of issues that are identified as a result of either (i) the supplier data acquisition or engagement processes or (ii) the receipt of information from other sources, Marvell determines that there is a reasonable risk that a supplier is sourcing Conflict Minerals that are directly or indirectly financing or benefiting armed groups, Marvell will enforce the Conflict Minerals Policy and the Supplier Code of Conduct and the other policies incorporated therein by means of a series of escalations.
* Such escalations shall be determined at the discretion of the Conflict Minerals Working Group and, as appropriate, of the CSR Committee and the Audit Committee of the Board of Directors, and may range from prompt engagement with the supplier to resolve the sourcing issue, to requiring such supplier to implement a risk management plan (which plan may involve, as appropriate, remedial action up to and including disengagement from upstream suppliers), to disengagement by Marvell from the applicable supplier.

***Step 4: Carry Out Independent Third-Party Audit of Supply Chain Due Diligence.***

Given that we do not source Conflict Minerals directly from smelters and refiners, we rely on third parties, including the CFSI, to coordinate and conduct third-party audits of these facilities. We rely on the published results of these third-party audits to validate the responsible sourcing practices of the smelters and refiners in our supply chain.

***Step 5: Report on Supply Chain Due Diligence.***

As required by the Rule, we have filed a Form SD and a Conflict Minerals Report as an exhibit thereto for the 2015 calendar year reporting period. The Form SD and Conflict Minerals Report are also available on our website at www.marvell.com under the heading “Investor Relations - Corporate Governance and Social Responsibility.”

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**VI.** **Conflict Minerals Processing Facilities**

Based on the information provided by our direct suppliers, and otherwise obtained through the due diligence process described above, we have provided information regarding the processing facilities from which we source the Conflict Minerals contained in our products on Appendix A to this Report. Because some of our direct suppliers provided supply chain information on a company level rather than on a product level, this list may include facilities that did not actually process Conflict Minerals contained in our products.

**VII.** **Country of Origin of Conflict Minerals**

Based on the information provided by our direct suppliers, and otherwise obtained through the due diligence process described above, some of the Conflict Minerals necessary to the functionality or production of our products may have originated from mines located in the Covered Countries. As shown on Appendix A, we determined during our due diligence that many of the smelters and refiners providing minerals to our direct suppliers that may have originated from mines located in the Covered Countries are CFSP-validated or actively engaged in the CFSP compliance process. For the CFSP “known smelters” whose status is unknown, we have not received information indicating or suggesting that our sourcing of necessary Conflict Minerals benefitted armed groups in any of the Covered Countries.

**VIII.** **Efforts to Determine Mine or Location of Origin**

As a downstream company, the primary focus of our due diligence on the source and chain of custody of the Conflict Minerals in our supply chain was on the collection and assessment of the CMRT data provided by our direct suppliers. As described above, we supplemented that data using data obtained from the CFSI, our customers and our own research. We were unable to ascertain the country of origin of all necessary Conflict Minerals contained in our products because certain smelters and refiners had not yet received a “conflict-free” designation from an independent third-party audit program and did not respond to our requests for country of origin data.

**IX.** **Results of Conflict Minerals Due Diligence**

Based on the results of the due diligence process with respect to the source and chain of custody of the Conflict Minerals contained in our products conducted for the 2015 reporting year, we do not have sufficient information to determine whether or not the Conflict Minerals contained in our products directly or indirectly finance or benefit armed groups in the Covered Countries.

**X.** **Independent Private Sector Audit**

Given that Marvell has not voluntarily elected to describe any of its products as “DRC conflict free,” an independent private sector audit of this Report has not been conducted.

**XI.** **Steps to Mitigate Risk**

The Company intends to take the following steps, among others, to further mitigate the risk that the Conflict Minerals necessary to the functionality or production of our products benefit armed groups in the Covered Countries:

* We intend to continue to monitor our direct suppliers’ Conflict Minerals sourcing practices to ensure that direct suppliers remain in compliance with our Conflict Minerals Policy and Supplier Code of Conduct.
* We intend to continue to engage with our direct suppliers, and, when necessary, the smelters and refiners from which our suppliers source Conflict Minerals, to attempt to obtain updated information regarding our supply chain, including CFSI “known smelters” listed on the CFSI’s Standard Smelter List and the location of the mines from which the Conflict Minerals originate.

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* We intend to continue to engage with our direct suppliers to encourage their smelters and refiners to obtain a “conflict-free” designation from an independent third-party audit program.
* We intend to continue to, when necessary, directly encourage the smelters and refiners from which our suppliers source Conflict Minerals to obtain a “conflict-free” designation from an independent third-party audit program.
* We intend to advise any of our direct suppliers found to be sourcing from smelters or refiners that we identify as high-risk to establish an alternative source for Conflict Minerals.
* We intend to continue to engage in EICC, CSFI and other industry initiatives promoting “conflict-free” supply chains.

**\* \* \* \***

FORWARD LOOKING STATEMENTS

Statements relating to due diligence improvements are forward-looking in nature and are based on Marvell’s management’s current expectations or beliefs. These forward-looking statements are not a guarantee of performance and are subject to a number of uncertainties and other factors that may be outside of Marvell’s control and that could cause actual events to differ materially from those expressed or implied by the statements made herein.

DOCUMENTS INCORPORATED BY REFERENCE

Unless otherwise stated herein, any documents, third-party materials or references to websites (including Marvell’s) are not incorporated by reference in, or considered to be a part of, this CMR, unless expressly incorporated by reference herein.

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**Appendix A**

**Conflict Minerals Processing Facilities as of May 3, 2016**

For the 2015 reporting year, our suppliers identified 290 smelters and refiners as potential sources of conflict minerals. Of such smelters and refiners, 211 have been validated as conflict-free by the CFSP or an independent third-party audit program, and 34 are active with the CFSP or participating in an independent third-party audit program, which represents a total of approximately 85 percent of the smelters and refiners in our supply chain.

Excluding our suppliers providing components and materials for our Kinoma hardware products, the manufacturing spend for which represents less than one percent of our total manufacturing spend, our suppliers identified 165 smelters and refiners as potential sources of conflict minerals, and of such smelters and refiners, 163 have been validated as conflict-free by the CFSP or an independent third-party audit program, and 2 are active with the CFSP or participating in an independent third-party audit program, which represents a total of 100 percent of such smelters and refiners.

Table 1 summarizes the validation status of smelters and refiner, including Kinoma Hardware Products, Table 2 summarizes the validation status of smelters and refiners, excluding Kinoma Hardware Products, and Table 3 contains the name and validation status of each smelter and refiner, including Kinoma Hardware Products. The validation statuses used in such tables have the following meanings:

1. “Validated” means validated with the CFSP assessment and audit protocol or independent third-party audit program as a result of providing sufficient documentation to demonstrate with reasonable confidence that the Conflict Minerals they processed originated from conflict-free sources and have not benefitted armed groups;
2. “Active” means active toward CFSP validation as a result of (i) committing to undergo a CFSP audit or (ii) participating in one or more of the cross-recognized certification programs; or
3. “Not Active” means appearing on the CFSI’s Standard Smelter List but not having attained a “Validated” or “Active” status.

Our suppliers do not source from, and the tables below do not include, processing facilities that have not been identified as “known” smelters by the

CFSI.

**Table 1:** Smelter and Refiner Validation Status Summary, including Kinoma Hardware Products

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
|  |  | **Gold** | **Tantalum** | **Tin** | **Tungsten** |  | **Total** |
|  | **Validated** | 79 | 44 | 58 | 30 | 211 (72.8%) | |
|  | **Active** | 15 | 0 | 10 | 9 | 34 | (11.7%) |
|  | **Not Active** | 27 | 0 | 14 | 4 | 45 | (15.5%) |
|  | **Total** | **121** | **44** | **82** | **43** |  | **290** |
| **Table 2:** Smelter and Refiner Validation Status Summary, excluding Kinoma Hardware Products | | | | | |  |  |
|  |  |  |  |  |  |  |  |
|  |  | **Gold** | **Tantalum** | **Tin** | **Tungsten** |  | **Total** |
|  | **Validated** | 62 | 36 | 46 | 19 | 163 (98.8%) | |
|  | **Active** | 0 | 0 | 2 | 0 | 2 | (1.2%) |
|  | **Not Active** | 0 | 0 | 0 | 0 | 0 (0%) | |
|  | **Total** | **62** | **36** | **48** | **19** |  | **165** |

**Table 3:** Smelter and Refiner Validation Status Summary, including Kinoma Hardware Products

|  |  |  |
| --- | --- | --- |
| **MINERAL** | **SMELTER NAME** | **STATUS** |
| Gold | Advanced Chemical Company | Active |
| Gold | Aida Chemical Industries Co., Ltd. | Validated |
| Gold | Aktyubinsk Copper Company TOO | Not Active |
| Gold | Allgemeine Gold-und Silberscheideanstalt A.G. | Validated |
| Gold | Almalyk Mining and Metallurgical Complex (AMMC) | Active |
| Gold | AngloGold Ashanti Córrego do Sítio Mineração | Validated |
| Gold | Argor-Heraeus SA | Validated |
| Gold | Asahi Pretec Corporation | Validated |
| Gold | Asahi Refining Canada Limited | Validated |
| Gold | Asahi Refining USA Inc. | Validated |
| Gold | Asaka Riken Co., Ltd. | Validated |
| Gold | Atasay Kuyumculuk Sanayi Ve Ticaret A.S. | Not Active |
| Gold | Aurubis AG | Validated |
| Gold | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | Validated |
| Gold | Boliden AB | Validated |
| Gold | C. Hafner GmbH + Co. KG | Validated |
| Gold | Caridad | Not Active |
| Gold | CCR Refinery - Glencore Canada Corporation | Validated |
| Gold | Cendres + Métaux SA | Active |
| Gold | Chimet S.p.A. | Validated |
| Gold | Chugai Mining | Not Active |
| Gold | Daejin Indus Co., Ltd. | Active |
| Gold | Daye Non-Ferrous Metals Mining Ltd. | Not Active |
| Gold | DODUCO GmbH | Validated |
| Gold | Dowa | Validated |
| Gold | DSC (Do Sung Corporation) | Active |
| Gold | Eco-System Recycling Co., Ltd. | Validated |
| Gold | Elemetal Refining, LLC | Validated |
| Gold | Faggi Enrico S.p.A. | Active |
| Gold | Gansu Seemine Material Hi-Tech Co., Ltd. | Not Active |
| Gold | Geib Refining Corporation | Active |
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM | Not Active |
| Gold | Guangdong Jinding Gold Limited | Not Active |
| Gold | Guoda Safina High-Tech Environmental Refinery Co., Ltd. | Not Active |
| Gold | Hangzhou Fuchunjiang Smelting Co., Ltd. | Not Active |
| Gold | Heimerle + Meule GmbH | Validated |
| Gold | Heraeus Ltd. Hong Kong | Validated |
| Gold | Heraeus Precious Metals GmbH & Co. KG | Validated |
|  | 2 |  |



|  |  |  |
| --- | --- | --- |
| Gold | Hunan Chenzhou Mining Co., Ltd. | Not Active |
| Gold | Hwasung CJ Co., Ltd. | Not Active |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Company Limited | Validated |
| Gold | Ishifuku Metal Industry Co., Ltd. | Validated |
| Gold | Istanbul Gold Refinery | Validated |
| Gold | Japan Mint | Validated |
| Gold | Jiangxi Copper Company Limited | Validated |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant | Validated |
| Gold | JSC Uralelectromed | Validated |
| Gold | JX Nippon Mining & Metals Co., Ltd. | Validated |
| Gold | Kazakhmys Smelting LLC | Not Active |
| Gold | Kazzinc Ltd | Validated |
| Gold | Kennecott Utah Copper LLC | Validated |
| Gold | KGHM Polska Miedź Spółka Akcyjna | Active |
| Gold | Kojima Chemicals Co., Ltd. | Validated |
| Gold | Korea Metal Co., Ltd. | Not Active |
| Gold | Korea Zinc Co. Ltd. | Active |
| Gold | Kyrgyzaltyn JSC | Not Active |
| Gold | L’ azurde Company For Jewelry | Not Active |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd. | Not Active |
| Gold | LS-NIKKO Copper Inc. | Validated |
| Gold | Luoyang Zijin Yinhui Gold Refinery Co., Ltd. | Not Active |
| Gold | Materion | Validated |
| Gold | Matsuda Sangyo Co., Ltd. | Validated |
| Gold | Metalor Technologies (Hong Kong) Ltd. | Validated |
| Gold | Metalor Technologies (Singapore) Pte., Ltd. | Validated |
| Gold | Metalor Technologies (Suzhou) Ltd. | Active |
| Gold | Metalor Technologies SA | Validated |
| Gold | Metalor USA Refining Corporation | Validated |
| Gold | METALÚRGICA MET-MEX PEÑOLES, S.A. DE C.V | Validated |
| Gold | Mitsubishi Materials Corporation | Validated |
| Gold | Mitsui Mining and Smelting Co., Ltd. | Validated |
| Gold | MMTC-PAMP India Pvt., Ltd. | Validated |
| Gold | Morris and Watson | Not Active |
| Gold | Moscow Special Alloys Processing Plant | Validated |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.Ş. | Validated |
| Gold | Navoi Mining and Metallurgical Combinat | Active |
| Gold | Nihon Material Co., Ltd. | Validated |
| Gold | Ögussa Österreichische Gold- und Silber-Scheideanstalt GmbH | Validated |
| Gold | Ohura Precious Metal Industry Co., Ltd. | Validated |
| Gold | OJSC “The Gulidov Krasnoyarsk Non-Ferrous Metals Plant” (OJSC Krastsvetmet) | Validated |
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|  |  |  |  |
| --- | --- | --- | --- |
| Gold | OJSC Kolyma Refinery |  | Not Active |
| Gold | OJSC Novosibirsk Refinery |  | Validated |
| Gold | PAMP SA |  | Validated |
| Gold | Penglai Penggang Gold Industry Co., Ltd. |  | Not Active |
| Gold | Prioksky Plant of Non-Ferrous Metals |  | Validated |
| Gold | PT Aneka Tambang (Persero) Tbk |  | Validated |
| Gold | PX Précinox SA |  | Validated |
| Gold | Rand Refinery (Pty) Ltd. |  | Validated |
| Gold | Republic Metals Corporation |  | Validated |
| Gold | Royal Canadian Mint |  | Validated |
| Gold | Sabin Metal Corp. |  | Not Active |
| Gold | Samduck Precious Metals |  | Active |
| Gold | SAMWON Metals Corp. |  | Not Active |
| Gold | SAXONIA Edelmetalle GmbH |  | Active |
| Gold | Schone Edelmetaal B.V. |  | Validated |
| Gold | SEMPSA Joyería Platería SA |  | Validated |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd. |  | Not Active |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd. |  | Validated |
| Gold | Sichuan Tianze Precious Metals Co., Ltd. |  | Validated |
| Gold | Singway Technology Co., Ltd. |  | Validated |
| Gold | So Accurate Group, Inc. |  | Not Active |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals |  | Validated |
| Gold | Solar Applied Materials Technology Corp. |  | Validated |
| Gold | Sumitomo Metal Mining Co., Ltd. |  | Validated |
| Gold | T.C.A S.p.A |  | Validated |
| Gold | Tanaka Kikinzoku Kogyo K.K. |  | Validated |
| Gold | The Refinery of Shandong Gold Mining Co., Ltd. |  | Validated |
| Gold | Tokuriki Honten Co., Ltd. |  | Validated |
| Gold | Tongling Nonferrous Metals Group Co., Ltd. |  | Not Active |
| Gold | Torecom |  | Active |
| Gold | Umicore Brasil Ltda. |  | Validated |
| Gold | Umicore Precious Metals Thailand |  | Validated |
| Gold | Umicore SA Business Unit Precious Metals Refining |  | Validated |
| Gold | United Precious Metal Refining, Inc. |  | Validated |
| Gold | Valcambi SA |  | Validated |
| Gold | Western Australian Mint trading as The Perth Mint |  | Validated |
| Gold | WIELAND Edelmetalle GmbH |  | Active |
| Gold | Yamamoto Precious Metal Co., Ltd. |  | Validated |
| Gold | Yokohama Metal Co., Ltd. |  | Validated |
| Gold | Yunnan Copper Industry Co., Ltd. |  | Not Active |
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| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation |  | Validated |
| Gold | Zijin Mining Group Co., Ltd. Gold Refinery |  | Validated |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd. |  | Validated |
| Tantalum | Conghua Tantalum and Niobium Smeltry |  | Validated |
| Tantalum | D Block Metals, LLC |  | Validated |
| Tantalum | Duoluoshan |  | Validated |
| Tantalum | Exotech Inc. |  | Validated |
| Tantalum | F&X Electro-Materials Ltd. |  | Validated |
| Tantalum | FIR Metals & Resource Ltd. |  | Validated |
| Tantalum | Global Advanced Metals Aizu |  | Validated |
| Tantalum | Global Advanced Metals Boyertown |  | Validated |
| Tantalum | Guangdong Zhiyuan New Material Co., Ltd. |  | Validated |
| Tantalum | H.C. Starck Co., Ltd. |  | Validated |
| Tantalum | H.C. Starck GmbH Goslar |  | Validated |
| Tantalum | H.C. Starck GmbH Laufenburg |  | Validated |
| Tantalum | H.C. Starck Hermsdorf GmbH |  | Validated |
| Tantalum | H.C. Starck Inc. |  | Validated |
| Tantalum | H.C. Starck Ltd. |  | Validated |
| Tantalum | H.C. Starck Smelting GmbH & Co.KG |  | Validated |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd. |  | Validated |
| Tantalum | Hi-Temp |  | Validated |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd. |  | Validated |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd. |  | Validated |
| Tantalum | Jiujiang Tanbre Co., Ltd. |  | Validated |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd. |  | Validated |
| Tantalum | KEMET Blue Metals |  | Validated |
| Tantalum | KEMET Blue Powder |  | Validated |
| Tantalum | King-Tan Tantalum Industry Ltd. |  | Validated |
| Tantalum | LSM Brasil S.A. |  | Validated |
| Tantalum | Metallurgical Products India Pvt., Ltd. |  | Validated |
| Tantalum | Mineração Taboca S.A. |  | Validated |
| Tantalum | Mitsui Mining & Smelting |  | Validated |
| Tantalum | Molycorp Silmet A.S. |  | Validated |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd. |  | Validated |
| Tantalum | Plansee SE Liezen |  | Validated |
| Tantalum | Plansee SE Reutte |  | Validated |
| Tantalum | QuantumClean |  | Validated |
| Tantalum | RFH Tantalum Smeltry Co., Ltd. |  | Validated |
| Tantalum | Solikamsk Magnesium Works OAO |  | Validated |
| Tantalum | Taki Chemicals |  | Validated |
| Tantalum | Telex Metals |  | Validated |
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| Tantalum | Tranzact, Inc. | Validated |
| Tantalum | Ulba Metallurgical Plant JSC | Validated |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd. | Validated |
| Tantalum | Yichun Jin Yang Rare Metal Co., Ltd. | Validated |
| Tantalum | Zhuzhou Cemented Carbide | Validated |
| Tin | Alpha | Validated |
| Tin | An Vinh Joint Stock Mineral Processing Company | Active |
| Tin | Chenzhou Yunxiang Mining and Metallurgy Company Limited | Active |
| Tin | China Tin Group Co., Ltd. | Validated |
| Tin | CNMC (Guangxi) PGMA Co., Ltd. | Not Active |
| Tin | Cooperativa Metalurgica de Rondônia Ltda. | Validated |
| Tin | CV Ayi Jaya | Validated |
| Tin | CV Gita Pesona | Validated |
| Tin | CV Serumpun Sebalai | Validated |
| Tin | CV United Smelting | Validated |
| Tin | CV Venus Inti Perkasa | Validated |
| Tin | Dowa | Validated |
| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | Active |
| Tin | Elmet S.L.U. (Metallo Group) | Validated |
| Tin | EM Vinto | Validated |
| Tin | Estanho de Rondônia S.A. | Not Active |
| Tin | Feinhütte Halsbrücke GmbH | Not Active |
| Tin | Fenix Metals | Validated |
| Tin | Gejiu Kai Meng Industry and Trade LLC | Active |
| Tin | Gejiu Non-Ferrous Metal Processing Co., Ltd. | Validated |
| Tin | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | Active |
| Tin | Gejiu Zili Mining And Metallurgy Co., Ltd. | Not Active |
| Tin | Huichang Jinshunda Tin Co., Ltd. | Not Active |
| Tin | Jiangxi Ketai Advanced Material Co., Ltd. | Validated |
| Tin | Linwu Xianggui Ore Smelting Co., Ltd. | Not Active |
| Tin | Magnu’s Minerais Metais e Ligas Ltda. | Validated |
| Tin | Malaysia Smelting Corporation (MSC) | Validated |
| Tin | Melt Metais e Ligas S/A | Validated |
| Tin | Metallic Resources, Inc. | Validated |
| Tin | Metallo-Chimique N.V. | Validated |
| Tin | Mineração Taboca S.A. | Validated |
| Tin | Minsur | Validated |
| Tin | Mitsubishi Materials Corporation | Validated |
| Tin | Nankang Nanshan Tin Manufactory Co., Ltd. | Not Active |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company | Active |
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| Tin | O.M. Manufacturing (Thailand) Co., Ltd. |  | Validated |
| Tin | O.M. Manufacturing Philippines, Inc. |  | Validated |
| Tin | Operaciones Metalurgical S.A. |  | Validated |
| Tin | Phoenix Metal Ltd. |  | Active |
| Tin | PT Alam Lestari Kencana |  | Not Active |
| Tin | PT Aries Kencana Sejahtera |  | Validated |
| Tin | PT Artha Cipta Langgeng |  | Validated |
| Tin | PT ATD Makmur Mandiri Jaya |  | Validated |
| Tin | PT Babel Inti Perkasa |  | Validated |
| Tin | PT Bangka Kudai Tin |  | Not Active |
| Tin | PT Bangka Prima Tin |  | Validated |
| Tin | PT Bangka Timah Utama Sejahtera |  | Not Active |
| Tin | PT Bangka Tin Industry |  | Validated |
| Tin | PT Belitung Industri Sejahtera |  | Validated |
| Tin | PT BilliTin Makmur Lestari |  | Validated |
| Tin | PT Bukit Timah |  | Validated |
| Tin | PT Cipta Persada Mulia |  | Validated |
| Tin | PT DS Jaya Abadi |  | Validated |
| Tin | PT Eunindo Usaha Mandiri |  | Validated |
| Tin | PT Fang Di MulTindo |  | Not Active |
| Tin | PT Inti Stania Prima |  | Validated |
| Tin | PT Justindo |  | Validated |
| Tin | PT Karimun Mining |  | Active |
| Tin | PT Mitra Stania Prima |  | Validated |
| Tin | PT Panca Mega Persada |  | Validated |
| Tin | PT Pelat Timah Nusantara Tbk |  | Not Active |
| Tin | PT Prima Timah Utama |  | Validated |
| Tin | PT Refined Bangka Tin |  | Validated |
| Tin | PT Sariwiguna Binasentosa |  | Validated |
| Tin | PT Seirama Tin Investment |  | Not Active |
| Tin | PT Stanindo Inti Perkasa |  | Validated |
| Tin | PT Sumber Jaya Indah |  | Validated |
| Tin | PT Timah (Persero) Tbk Kundur |  | Validated |
| Tin | PT Timah (Persero) Tbk Mentok |  | Validated |
| Tin | PT Tinindo Inter Nusa |  | Validated |
| Tin | PT Tirus Putra Mandiri |  | Not Active |
| Tin | PT Tommy Utama |  | Validated |
| Tin | PT Wahana Perkit Jaya |  | Validated |
| Tin | Resind Indústria e Comércio Ltda. |  | Validated |
| Tin | Rui Da Hung |  | Validated |
| Tin | Soft Metais Ltda. |  | Validated |
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| Tin | Thaisarco | Validated |
| Tin | Tuyen Quang Non-Ferrous Metals Joint Stock Company | Active |
| Tin | VQB Mineral and Trading Group JSC | Validated |
| Tin | White Solder Metalurgia e Mineração Ltda. | Validated |
| Tin | Yunnan Chengfeng Non-ferrous Metals Co., Ltd. | Active |
| Tin | Yunnan Tin Group (Holding) Company Limited | Validated |
| Tungsten | A.L.M.T. TUNGSTEN Corp. | Validated |
| Tungsten | Asia Tungsten Products Vietnam Ltd. | Validated |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd. | Validated |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd. | Validated |
| Tungsten | Dayu Jincheng Tungsten Industry Co., Ltd. | Active |
| Tungsten | Dayu Weiliang Tungsten Co., Ltd. | Active |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd. | Validated |
| Tungsten | Ganxian Shirui New Material Co., Ltd. | Not Active |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd. | Validated |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd. | Validated |
| Tungsten | Ganzhou Non-ferrous Metals Smelting Co., Ltd. | Active |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd. | Validated |
| Tungsten | Ganzhou Yatai Tungsten Co., Ltd. | Validated |
| Tungsten | Global Tungsten & Powders Corp. | Validated |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd. | Validated |
| Tungsten | H.C. Starck GmbH | Validated |
| Tungsten | H.C. Starck Smelting GmbH & Co.KG | Validated |
| Tungsten | Hunan Chenzhou Mining Co., Ltd. | Validated |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji | Validated |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Yanglin | Not Active |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd. | Validated |
| Tungsten | Hydrometallurg, JSC | Validated |
| Tungsten | Japan New Metals Co., Ltd. | Validated |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd. | Active |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd. | Validated |
| Tungsten | Jiangxi Minmetals Gao’an Non-ferrous Metals Co., Ltd. | Not Active |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | Active |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd. | Active |
| Tungsten | Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd. | Validated |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd. | Active |
| Tungsten | Kennametal Fallon | Active |
| Tungsten | Kennametal Huntsville | Validated |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd. | Validated |
| Tungsten | Niagara Refining LLC | Validated |
| Tungsten | Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC | Validated |
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| Tungsten | Pobedit, JSC | Active |
| Tungsten | Sanher Tungsten Vietnam Co., Ltd. | Not Active |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd. | Validated |
| Tungsten | Vietnam Youngsun Tungsten Industry Co., Ltd. | Validated |
| Tungsten | Wolfram Bergbau und Hütten AG | Validated |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd. | Validated |
| Tungsten | Xiamen Tungsten Co., Ltd. | Validated |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd. | Validated |

The “Validated” smelters and refiners in the list above that report country of origin information to the CFSI reported that the Conflict Minerals processed by these facilities originated from the following countries:

Angola, Argentina, Australia, Austria, Belgium, Bolivia, Brazil, Burundi, Cambodia, Canada, Central African Republic, Chile, China, Colombia, Cote D’Ivoire, Czech Republic, Democratic Republic of the Congo, Djibouti, Ecuador, Egypt, Estonia, Ethiopia, France, Germany, Guyana, Hungary, India, Indonesia, Ireland, Israel, Japan, Kazakhstan, Kenya, Laos, Luxembourg, Madagascar, Malaysia, Mongolia, Mozambique, Myanmar, Namibia, Netherlands, Nigeria, Peru, Portugal, Republic of Congo, Russia, Rwanda, Sierra Leone, Singapore, Slovakia, South Africa, South Korea, South Sudan, Spain, Suriname, Switzerland, Taiwan, Tanzania, Thailand, Uganda, United Kingdom, United States of America, Vietnam, Zambia and Zimbabwe.

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