**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**

**0-30877**

**77-0481679**

**(State or other jurisdiction of**

**incorporation or organization)**

**(Commission**

**File No.)**

**(I.R.S. Employer**

**Identification No.)**

**Canon’s Court**

**22 Victoria Street**

**Hamilton HM 12, Bermuda**

**(Address of principal executive offices)**

**Mitchell L. Gaynor**

**Executive Vice President, Chief Administration and Legal Officer**

**408-222-0501**

**(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, 2017 to December 31, 2017.



**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, 2017 to December 31, 2017 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 “Company” – “Investor Relations” – “Governance” – “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, 2017 to December 31, 2017. | | |
|  |  |  | 2 |  |  |

**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 undersigned, thereunto duly authorized.

Date: May 31, 2018

**Marvell Technology Group Ltd.**

By: /s/ Mitchell L. Gaynor



Mitchell L. Gaynor

Executive Vice President, Chief Administration and

Legal Officer

3

Exhibit 1.01

**MARVELL TECHNOLOGY GROUP LTD.**

**CONFLICT MINERALS REPORT**

**(For the reporting period January 1, 2017 to December 31, 2017)**

**INTRODUCTION**

This Conflict Minerals Report (the “**Report**”) for Marvell Technology Group Ltd. (“**Company**,” “**Marvell**,” “**we**,” “**us**,” “**our**”) is provided in accordance with Rule 13p-1 under the Securities Exchange Act of 1934 (the “**Rule**”) for the reporting period from January 1, 2017 to December 31, 2017. The Report is being filed as Exhibit 1.01 to our specialized disclosure report on Form SD and is also posted on our website at www.marvell.com under the heading “Company” – “Investor Relations” – “Governance” – “Social Responsibility.” Information contained on or accessible through our website is not a part of this Report.

The Rule imposes certain reporting obligations on Securities and Exchange Commission (“**SEC**”) registrants who manufacture products containing the minerals and metals referred to in the Rule as “**Conflict Minerals.**” The Democratic Republic of the Congo (“**DRC**”) and its adjoining countries have reserves of Conflict Minerals, some of which are illegally sourced and traded by armed groups who are responsible for significant human rights violations. “Armed groups” mean an armed group that is identified as a perpetrator of serious human rights abuses in the annual Country Reports on Human Rights Practices under sections 116(d) and 502B(b) of the Foreign Assistance Act of 1961 relating to the DRC or an adjoining country. The purpose of the Rule is to encourage companies whose products contain Conflict Minerals to endeavor to source from suppliers who do not directly or indirectly support such armed groups through their purchasing decisions. The Democratic Republic of the Congo and its adjoining countries – Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia – are sometimes referred to in this Report as the “Covered Countries.”

We are subject to the Rule because our products contain Conflict Minerals that are necessary to the functionality or production of such products (“**Necessary Conflict Minerals**”). Accordingly, we are required under the Rule to conduct a reasonable country of origin inquiry (“**RCOI**”) designed to determine in good-faith whether any of the Necessary Conflict Minerals either originated in the Covered Countries or came from recycled or scrap materials. We do not directly source Conflict Minerals from mines, smelters or refiners.

**Supply Chain and Products**

Our products typically contain many parts and components obtained from a global network of direct suppliers with multiple, lower tiers of suppliers between us and the ultimate sources of the raw materials used in the manufacturing of our products. Raw materials purchased by our direct and indirect suppliers contain Conflict Minerals obtained from smelters and refiners that, in turn, source those minerals from traders and mines in various countries.

We rely on our direct suppliers to provide information with respect to the origin and source and chain of custody of the Necessary Conflict Minerals contained in parts, components and materials supplied to us. In all cases, the information relating to the Necessary Conflict Minerals contained in our products comes from multiple, lower tier suppliers and from information (i) available to us through our membership with the Responsible Minerals Initiative (“**RMI**”) (formerly the Conflict-Free Sourcing Initiative), (ii) provided by our customers and (iii) obtained by means of our own research.

We do not own or operate foundries or manufacturing facilities, but outsource the manufacturing, packaging and testing of our products to third-party foundries and subcontractors located primarily in Asia. We are a fabless provider of high-performance, application-specific standard semiconductor products. Our core strength is developing complex system-on-a-chip devices, leveraging our technology portfolio of intellectual property in the areas of analog, mixed-signal, digital-signal processing and embedded and standalone integrated circuits. We also develop integrated hardware platforms along with software that incorporates digital computing technologies designed and configured to provide an optimized computing solution. Our current product offerings are primarily in three broad end markets: storage, networking and connectivity.

***Storage Products***. Marvell develops data storage products, with applications spanning consumer, client, data center and enterprise markets. Productsinclude controllers for hard disk drives (“**HDDs**”) and solid-state drives (“**SSDs**”) that store and retrieve data with greater speed and reliability while consuming a reduced amount of energy. These products are incorporated into HDDs and SSDs for many different applications, including desktop and laptop personal computers, servers, game consoles, and similar devices.

***Networking Products***. Marvell develops networking products that serve end-users in cloud, enterprise, small and medium business, and serviceprovider networks. Products include (i) physical layer transceivers that are used in a wide range of products, including switch systems, printers, game consoles, automobiles and other systems that require Ethernet connectivity; (ii) Ethernet switch integrated circuits to provide switching and packet processing; and (iii) embedded ARM-based processors.

***Connectivity Products***. Marvell develops wireless connectivity products that serve consumer, enterprise, desktop, service provider, and automotivemarkets. Products include client and access point chips that enable wireless communication using WiFi and Bluetooth standards.

***Products Covered by this Report***. For purposes of this Report, “products” refers to the products in the product categories listed above with respect towhich manufacturing was completed during calendar year 2017, and “suppliers” refers to our direct product suppliers.

2

**REASONABLE COUNTRY OF ORIGIN INQUIRY AND DUE DILIGENCE**

To comply with the Rule, we conducted a reasonable country of origin inquiry and due diligence on the source and chain of custody of the Necessary Conflict Minerals to determine whether they originated in a Covered Country and financed or benefited armed groups in any of these countries.

**Reasonable Country of Origin Inquiry**

Marvell conducted a reasonable county of origin inquiry (“**RCOI**”) to determine whether the Necessary Conflict Minerals in our products originated in one of the Covered Countries or are from recycled or scrap sources.

Because we do not purchase conflict minerals directly from any smelter or refiner, we rely on our direct suppliers to provide us with accurate information about the origin of the minerals in the products and components they supply to us. Our direct suppliers provide us with this information by completing a Conflict Minerals Reporting Template (“**CMRT**”). In addition to the information provided on the CMRT, we rely on (i) information from industry sources such as the RBA and the RMI, (ii) information provided by our customers, and (iii) information obtained by means of our own research.

Based on the findings of our RCOI, we have reason to believe that some of the Necessary 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.

**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 Necessary Conflict Minerals. 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, Third 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-stepframework for risk-based due diligence for responsible supply chains of minerals sourced from conflict-affected and high-risk areas.

3

**Due Diligence Performed**

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

* Marvell maintains a Policy Statement on Conflict Minerals (the “**Policy Statement**”), 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 Policy Statement is posted on our website at www.marvell.com under the heading “Company” – “Investor Relations” – “Governance” – “Social Responsibility.”
* Marvell maintains a Supplier Code of Conduct that, among other things, requires our suppliers to comply with the Policy Statement, as well as with the Marvell Code of Business Conduct and Ethics and the RBA Code of Conduct. The Supplier Code of Conduct is posted on our website at www.marvell.com under the heading “Company” – “Investor Relations” – “Governance” – “Social Responsibility.”
* Marvell has a Conflict Minerals Working Group (“**Working Group**”) that is comprised of subject matter experts from the Company’s Quality Systems, Operations and Legal teams. The Working Group manages Marvell’s reasonable country of origin inquiry, and conducts due diligence on the source and chain of custody of Marvell’s Necessary Conflict Minerals.
* We use a multi-layered approach to convey our supplier responsibility expectations to our direct suppliers. Our direct suppliers have been provided with our Policy Statement, Supplier Code of Conduct and product and manufacturing specifications (the “**Specifications**”), and any new suppliers are similarly provided such documents as part of the Quality Systems group’s supplier onboarding process. Marvell’s Specifications contain provisions requiring that suppliers (i) comply with the Policy Statement and the Supplier Code of Conduct and (ii) cooperate with Marvell in providing the information required by the CMRT. Further, the Specifications 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.
* Marvell maintains a confidential Concern Line, administered by an independent, third-party service provider, that is available to employees and the general public 24 hours per day, seven days per week. The Concern Line accepts anonymous reports and may be used to report illegal or unethical conduct. Information about the Concern Line is included in our Supplier Code of Conduct, and posted on our website at www.marvell.com under the heading “Sustainability” – “Ethics.”

4

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

* + We received completed CMRTs from 100% of our direct suppliers during our twice yearly CMRT inquiry and used our suppliers’ completed CMRTs to identify smelters and refiners and determine the mine and country of origin of the minerals processed by such smelters and refiners.
* We are a member of the Responsible Business Alliance and the RMI, a leading industry program that helps members manage risk by improving Conflict Minerals supply chain transparency. As a member of the RMI, Marvell has access to RMI’s reasonable country of origin data that aids us in determining the mine or location of origin of the Conflict Minerals in our supply chain.
  + We cross-check information received from our suppliers against data made available by these industry organizations, against additional information obtained from our customers and by means of our own research to determine whether such facilities are conformant with the assessment protocols of the RMI’s Responsible Minerals Assurance Process (the “**RMAP**”) (formerly the Conflict-Free Smelter Program). The RMAP conducts independent third-party audits of a smelter and refiner’s management systems and sourcing practices to validate conformance with RMAP protocols and current global standards (the “**Third-Party Audit Program**”). The Third-Party Audit Program employs a risk-based approach to validate smelters’ and refiners’ company level management processes for responsible mineral procurement (“**RMAP conformant**”). When necessary, we engage with smelters and refiners that we identify as at risk of not obtaining a “conflict-free” designation from a Third-Party Audit Program and encourage such smelters and refiners to become RMAP conformant.



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

* We have developed procedures for sending CMRTs to our suppliers twice a year, and we review their responses, consolidate the information in a central database and follow up with suppliers to address any incomplete or inconsistent responses.
* As needed, we survey 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.
* As needed, we encourage our suppliers to conduct investigations of any smelters or refiners that we identify as at risk of not obtaining a “conflict-free” designation from a Third-Party Audit Program or that we identify as inoperative and work with our suppliers to mitigate such risk and, where unsuccessful, to transition their processing to RMAP conformant smelters or refiners.

5

* We have shared with our suppliers our expectations regarding sourcing from “conflict-free” designated smelters and refiners by means of our Policy Statement, Supplier Code of Conduct and the Specifications.
* When necessary, we directly encourage 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 a 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 apply the Policy Statement 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 may range from prompt engagement with the supplier to resolve the sourcing issue, to requiring such supplier to implement a risk management plan (which 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 the Necessary Conflict Minerals directly from smelters and refiners, we rely on independent third parties, including the RMI, 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 2017 calendar year reporting period. The Form SD and Conflict Minerals Report are also available on our website at www.marvell.com under the heading “Company” – “Investor Relations” – “Governance” – “Social Responsibility.”

**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 Necessary Conflict Minerals contained in our products in 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 the Necessary Conflict Minerals contained in our products.

6

**Country of Origin of Conflict Minerals**

Based on information provided by our direct suppliers, or otherwise obtained through the due diligence process described above, some of the Necessary Conflict Minerals may have originated from mines located in the Covered Countries; however, as of the end of the 2017 reporting year, all of the smelters and refiners providing the Necessary Conflict Minerals originating from such mines were RMAP conformant.

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

As described above, the primary focus of our due diligence on the source and chain of custody of the Necessary Conflict Minerals in our supply chain was on the collection and assessment of (i) data provided by our direct suppliers on the CMRT, (ii) data provided by the RMI, (iii) data provided by our customers and (iv) data obtained by means of our own research.

Despite our findings as of the end of the 2017 reporting year that all of the smelters and refiners providing the Necessary Conflict Minerals originating from such mines were RMAP conformant, during the 2017 reporting year, we received CMRT data indicating that there were certain smelters and refiners in our supply chain that were not RMAP conformant. Therefore, we are unable to conclusively determine the country of origin of all our products.

**Independent Private Sector Audit**

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

**Steps to Mitigate Risk**

The Company intends to take the following steps, among others, to further mitigate the risk that the Necessary Conflict Minerals benefit armed groups in the Covered Countries:

* We will continue to monitor our direct suppliers’ Conflict Minerals sourcing practices to ensure that direct suppliers remain in compliance with our Policy Statement and Supplier Code of Conduct.
* We will continue to engage with our direct suppliers, and, when necessary, the smelters and refiners from which our suppliers source Conflict Minerals, to obtain updated information regarding our supply chain, including RMI “known smelters” listed on the RMI’s Smelter Reference List and the location of the mines from which the Conflict Minerals originate.
* We will continue to engage with our direct suppliers to encourage their smelters and refiners to obtain a “conflict free” designation from a Third-Party Audit Program.

7

* We will continue to, when necessary, directly encourage the smelters and refiners from which our suppliers source the Necessary Conflict Minerals to obtain a “conflict free” designation from a Third-Party Audit Program.
* We will 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 the Necessary Conflict Minerals.
* We will continue to engage in the RBA, the RMI and other industry initiatives promoting “conflict-free” supply chains.

\* \* \* \*

FORWARD LOOKING STATEMENTS

Statements relating to due diligence improvements and certain other statements herein 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.

8

**Appendix A**

**Conflict Minerals Processing Facilities Status as of March 16, 2018**

As of the end of the 2017 reporting year, our direct suppliers identified 241 smelters and refiners as potential sources of the Necessary Conflict Minerals used in our products, and each of such smelters and refiners is in conformance with the assessment protocols of the RMAP or another Third-Party Audit Program.

However, as noted above, despite our findings as of the end of the 2017 reporting year, during the 2017 reporting year, we received CMRT data indicating that there were certain smelters and refiners in our supply chain that were not RMAP conformant. The non-conformance was attributed to smelters or refiners being inoperative, smelters or refiners not completing a third-party audit, or other causes. We are therefore unable to ascertain the country of origin of all Necessary Conflict Minerals, and for this reason, Marvell has not voluntarily elected to describe any of its products as “DRC conflict free.”

Table 1 contains the name of and mineral processed by each smelter and refiner reported to be in our supply chain as of the end of the 2017 reporting year. All smelters and refiners listed are RMAP conformant. These smelters and refiners successfully passed a Third-Party Audit Program, validating that its management systems and sourcing practices meet the requirements of the relevant RMAP standard noted above and current global standards.

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

RMI.

|  |  |  |  |
| --- | --- | --- | --- |
|  |  | **Table 1** |  |
|  |  | **Smelter and Refiner Conformance Status** |  |
| CONFLICT | | SMELTER OR REFINER NAME |  |
| MINERAL | |  |
| Gold |  | Advanced Chemical Company |  |
| Gold | | Aida Chemical Industries Co., Ltd. |  |
| Gold | | Allgemeine Gold-und Silberscheideanstalt A.G. |  |
| Gold | | Almalyk Mining and Metallurgical Complex (AMMC) |  |
| Gold | | AngloGold Ashanti Corrego do Sitio Mineracao |  |
| Gold | | Argor-Heraeus S.A. |  |

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Asahi Pretec Corp.



Asaka Riken Co., Ltd.

Aurubis AG

Bangko Sentral ng Pilipinas (Central Bank of the Philippines)

Boliden AB

C. Hafner GmbH + Co. KG

CCR Refinery - Glencore Canada Corporation

Chimet S.p.A.

Daejin Indus Co., Ltd.

DSC (Do Sung Corporation)

DODUCO Contacts and Refining GmbH

Dowa

Eco-System Recycling Co., Ltd.

OJSC Novosibirsk Refinery

Heimerle + Meule GmbH

Heraeus Metals Hong Kong Ltd.

Heraeus Precious Metals GmbH & Co. KG

Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.

Ishifuku Metal Industry Co., Ltd.

Istanbul Gold Refinery

Japan Mint

Jiangxi Copper Co., Ltd.

Asahi Refining USA Inc.

Asahi Refining Canada Ltd.

JSC Ekaterinburg Non-Ferrous Metal Processing Plant

JSC Uralelectromed

JX Nippon Mining & Metals Co., Ltd.

Kazzinc

Kennecott Utah Copper LLC

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Kojima Chemicals Co., Ltd.



Kyrgyzaltyn JSC

LS-NIKKO Copper Inc.

Materion

Matsuda Sangyo Co., Ltd.

Metalor Technologies (Suzhou) Ltd.

Metalor Technologies (Hong Kong) Ltd.

Metalor Technologies (Singapore) Pte., Ltd.

Metalor Technologies S.A.

Metalor USA Refining Corporation

Metalurgica Met-Mex Penoles S.A. De C.V.

Mitsubishi Materials Corporation

Mitsui Mining and Smelting Co., Ltd.

Moscow Special Alloys Processing Plant

Nadir Metal Rafineri San. Ve Tic. A.S.

Nihon Material Co., Ltd.

Ohura Precious Metal Industry Co., Ltd.

OJSC “The Gulidov Krasnoyarsk Non-Ferrous Metals Plant” (OJSC Krastsvetmet)

PAMP S.A.

Prioksky Plant of Non-Ferrous Metals

PT Aneka Tambang (Persero) Tbk

PX Precinox S.A.

Rand Refinery (Pty) Ltd.

Royal Canadian Mint

Samduck Precious Metals

Schone Edelmetaal B.V.

SEMPSA Joyeria Plateria S.A.

Shandong Zhaojin Gold & Silver Refinery Co., Ltd.

Sichuan Tianze Precious Metals Co., Ltd.

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

Gold

SOE Shyolkovsky Factory of Secondary Precious Metals



Solar Applied Materials Technology Corp.

Sumitomo Metal Mining Co., Ltd.

Tanaka Kikinzoku Kogyo K.K.

The Refinery of Shandong Gold Mining Co., Ltd.

Tokuriki Honten Co., Ltd.

Torecom

Umicore Brasil Ltda.

Umicore S.A. Business Unit Precious Metals Refining

United Precious Metal Refining, Inc.

Valcambi S.A.

Western Australian Mint (T/a The Perth Mint)

Yamakin Co., Ltd.

Yokohama Metal Co., Ltd.

Zhongyuan Gold Smelter of Zhongjin Gold Corporation

Gold Refinery of Zijin Mining Group Co., Ltd.

Umicore Precious Metals Thailand

Geib Refining Corporation

MMTC-PAMP India Pvt., Ltd.

Republic Metals Corporation

Singway Technology Co., Ltd.

Al Etihad Gold LLC

Emirates Gold DMCC

T.C.A S.p.A

Korea Zinc Co., Ltd.

SAAMP

SAXONIA Edelmetalle GmbH

WIELAND Edelmetalle GmbH

Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH

Gold Tantalum Tantalum Tantalum Tantalum Tantalum Tantalum Tantalum Tantalum Tantalum Tantalum Tantalum Tantalum Tantalum Tantalum Tantalum Tantalum Tantalum Tantalum Tantalum Tantalum Tantalum Tantalum Tantalum Tantalum Tantalum Tantalum Tantalum Tantalum

AU Traders and Refiners



Changsha South Tantalum Niobium Co., Ltd.

Conghua Tantalum and Niobium Smeltry

Exotech Inc.

F&X Electro-Materials Ltd.

Guangdong Zhiyuan New Material Co., Ltd.

JiuJiang JinXin Nonferrous Metals Co., Ltd.

Jiujiang Nonferrous Metals Smelting Company Limited

LSM Brasil S.A.

Metallurgical Products India Pvt., Ltd.

Mineracao Taboca S.A.

Mitsui Mining & Smelting

NPM Silmet AS

Ningxia Orient Tantalum Industry Co., Ltd.

QuantumClean

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

Solikamsk Magnesium Works OAO

Taki Chemical Co., Ltd.

Telex Metals

Ulba Metallurgical Plant JSC

Yichun Jin Yang Rare Metal Co., Ltd.

Hengyang King Xing Lifeng New Materials Co., Ltd.

D Block Metals, LLC

FIR Metals & Resource Ltd.

Jiujiang Zhongao Tantalum & Niobium Co., Ltd.

XinXing HaoRong Electronic Material Co., Ltd.

Jiangxi Dinghai Tantalum & Niobium Co., Ltd.

KEMET Blue Metals

H.C. Starck Co., Ltd.

Tantalum

Tantalum

Tantalum

Tantalum

Tantalum

Tantalum

Tantalum

Tantalum

Tantalum

Tantalum

Tantalum

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

H.C. Starck Tantalum and Niobium GmbH



H.C. Starck Hermsdorf GmbH

H.C. Starck Inc.

H.C. Starck Ltd.

H.C. Starck Smelting GmbH & Co. KG

Global Advanced Metals Boyertown

Global Advanced Metals Aizu

KEMET Blue Powder

Resind Industria e Comercio Ltda.

Jiangxi Tuohong New Raw Material

Power Resources Ltd.

Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.

Jiangxi Ketai Advanced Material Co., Ltd.

Alpha

CV Gita Pesona

PT Aries Kencana Sejahtera

CV Serumpun Sebalai

CV United Smelting

Dowa

EM Vinto

Fenix Metals

Gejiu Non-Ferrous Metal Processing Co., Ltd.

Huichang Jinshunda Tin Co., Ltd.

Gejiu Kai Meng Industry and Trade LLC

China Tin Group Co., Ltd.

Malaysia Smelting Corporation (MSC)

Metallic Resources, Inc.

Mineracao Taboca S.A.

Minsur

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Mitsubishi Materials Corporation



Nankang Nanshan Tin Manufactory Co., Ltd.

O.M. Manufacturing (Thailand) Co., Ltd.

Operaciones Metalurgical S.A.

PT Artha Cipta Langgeng

PT Babel Inti Perkasa

PT Bangka Tin Industry

PT Belitung Industri Sejahtera

PT Bukit Timah

PT DS Jaya Abadi

PT Eunindo Usaha Mandiri

PT Karimun Mining

PT Mitra Stania Prima

PT Panca Mega Persada

PT Prima Timah Utama

PT Refined Bangka Tin

PT Sariwiguna Binasentosa

PT Stanindo Inti Perkasa

PT Sumber Jaya Indah

PT Timah (Persero) Tbk Kundur

PT Timah (Persero) Tbk Mentok

PT Tinindo Inter Nusa

PT Tommy Utama

Rui Da Hung

Soft Metais Ltda.

Thaisarco

Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.

White Solder Metalurgia e Mineracao Ltda.

Yunnan Chengfeng Non-ferrous Metals Co., Ltd.

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tin

Tungsten

Tungsten

Tungsten

Tungsten

Tungsten

Tungsten

Tungsten

Yunnan Tin Company Limited



CV Venus Inti Perkasa

Magnu’s Minerais Metais e Ligas Ltda.

Melt Metais e Ligas S.A.

PT ATD Makmur Mandiri Jaya

O.M. Manufacturing Philippines, Inc.

PT Inti Stania Prima

CV Ayi Jaya

CV Dua Sekawan

CV Tiga Sekawan

Resind Industria e Comercio Ltda.

Metallo Belgium N.V.

Metallo Spain S.L.U.

PT Bangka Prima Tin

PT Sukses Inti Makmur

PT Kijang Jaya Mandiri

PT Menara Cipta Mulia

Gejiu Fengming Metallurgy Chemical Plant

Guanyang Guida Nonferrous Metal Smelting Plant

Gejiu Jinye Mineral Company

PT Lautan Harmonis Sejahtera

Guangdong Hanhe Non-Ferrous Metal Co., Ltd.

A.L.M.T. TUNGSTEN Corp.

Kennametal Huntsville

Guangdong Xianglu Tungsten Co., Ltd.

Chongyi Zhangyuan Tungsten Co., Ltd.

Fujian Jinxin Tungsten Co., Ltd.

Global Tungsten & Powders Corp.

Hunan Chenzhou Mining Co., Ltd.

Tungsten Tungsten Tungsten Tungsten Tungsten Tungsten Tungsten Tungsten Tungsten Tungsten Tungsten Tungsten Tungsten Tungsten Tungsten Tungsten Tungsten Tungsten Tungsten Tungsten Tungsten Tungsten Tungsten Tungsten Tungsten Tungsten Tungsten Tungsten Tungsten

Hunan Chunchang Nonferrous Metals Co., Ltd.



Japan New Metals Co., Ltd.

Ganzhou Huaxing Tungsten Products Co., Ltd.

Kennametal Fallon

Tejing (Vietnam) Tungsten Co., Ltd.

Vietnam Youngsun Tungsten Industry Co., Ltd.

Wolfram Bergbau und Hutten AG

Xiamen Tungsten Co., Ltd.

Xinhai Rendan Shaoguan Tungsten Co., Ltd.

Ganzhou Jiangwu Ferrotungsten Co., Ltd.

Jiangxi Yaosheng Tungsten Co., Ltd.

Jiangxi Xinsheng Tungsten Industry Co., Ltd.

Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.

Malipo Haiyu Tungsten Co., Ltd.

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

Jiangxi Gan Bei Tungsten Co., Ltd.

Ganzhou Seadragon W & Mo Co., Ltd.

Asia Tungsten Products Vietnam Ltd.

Chenzhou Diamond Tungsten Products Co., Ltd.

Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd.

H.C. Starck Tungsten GmbH

H.C. Starck Smelting GmbH & Co. KG

Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC

Jiangwu H.C. Starck Tungsten Products Co., Ltd.

Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji

Niagara Refining LLC

Hydrometallurg, JSC

Unecha Refractory metals plant

South-East Nonferrous Metal Company Limited of Hengyang City

Tungsten

Philippine Chuangxin Industrial Co., Inc.



Tungsten

Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.

Tungsten

Woltech Korea Co., Ltd.

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

Australia, Austria, Benin, Bolivia (Plurinational State of), Brazil, Burkina Faso, Burundi, Cambodia, Canada, Chile, China, Colombia, Democratic Republic of Congo, Ecuador, Eritrea, Ethiopia, France, Ghana, Guatemala, Guinea, Guyana, Honduras, India, Indonesia, Japan, Laos, Madagascar, Malaysia, Mali, Mexico, Mongolia, Mozambique, Myanmar, Namibia, Nicaragua, Nigeria, Panama, Peru, Portugal, Russia, Rwanda, Senegal, Sierra Leone, South Africa, Spain, Thailand, Togo, Uganda, United States of America, Uzbekistan, Vietnam, Zimbabwe