**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 and Secretary**

**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, 2019 to December 31, 2019.



**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, 2019 to December 31, 2019 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” – “Financials” – “SEC Filings.”

**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, 2019 to December 31, 2019.

**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: June 1, 2020

**Marvell Technology Group Ltd.**

By: /s/ Mitchell L. Gaynor



Mitchell L. Gaynor

Executive Vice President, Chief

Administration and Legal Officer and Secretary

**Exhibit 1.01**

**MARVELL TECHNOLOGY GROUP LTD.**

**CONFLICT MINERALS REPORT**

**(For the reporting period January 1, 2019 to December 31, 2019)**

**INTRODUCTION**

This Conflict Minerals Report (the “**Report**”) for Marvell Technology Group Ltd. (“**Company**,” “**Marvell**,” “**we**,” “**us**” or “**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, 2019 to December 31, 2019 and, unless otherwise indicated herein with respect to a particular statement, covers the activities of all Company subsidiaries. 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” – “Financials” – “SEC Filings.” Information contained on or accessible through our website is not 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 suppliers, with multiple 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 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 highly integrated and 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. Our current product offerings are primarily in two broad product groups: storage and networking.

***Networking Products***

*Ethernet Solutions*

We offer a broad portfolio of Ethernet solutions spanning controllers, network adapters, physical transceivers and switches. Our Ethernet solutions address a wide variety of end-customer data infrastructure products from small, high-reliability automotive sub-systems to large, high-performance modular enterprise and data center solutions.

*Processors*

We offer highly integrated semiconductors that provide single or multiple core processors, along with intelligent Layer 2 through 7 processing of the OSI (Open Systems Interconnection) stack which is the framework that governs network communications within enterprise, datacenter, storage, and carrier markets. All of our products are compatible with standards-based operating systems and general-purpose software to enable ease of programming, and are supported by our ecosystem partners.

*Custom ASICs*

We develop custom product solutions tailored to individual customer specifications that deliver system-level differentiation for next-generation carrier, networking, data center, machine learning, automotive, aerospace and defense applications. These custom offerings leverage our broad portfolio of technologies being used in our standard products.

***Storage Products***

*Storage Controllers*

We offer a broad portfolio of storage controllers for hard disk drives (“HDDs”) and solid-state-drives (“SSDs”) across all high-volume markets. Our controllers integrate several key Marvell technologies spanning compute, networking, security and storage. These key technologies enable our controllers to be optimized performance-power solutions and help our customers high-efficient storage products. Our HDD controllers integrate Marvell’s industry-leading read channel technologies to enable higher volumetric densities at low power profiles and are being used by all the current HDD makers. Our technology density and power differentiators are critical for addressing the fast-growing high-capacity, nearline HDD data center and enterprise markets. To further enhance our HDD controller differentiation and value propositions, we offer customers preamplifier products as part of a chipset with our HDD controllers to increase our customers’ product efficiencies. Our HDD controllers support all the high-volume host system interfaces, including Serial Advanced Technology Attachment (“SATA”) and Serial Attached SCSI (“SAS”), which are critical for the data center and enterprise markets.

*Fibre Channel Products*

Our QLogic Fibre Channel product family comprises of host bus adapters (HBAs) and controllers for server and storage system connectivity. These products accelerate enterprise and data center applications, deliver a highly resilient infrastructure, enable greater server virtualization density along with an advanced set of data center diagnostic, orchestration and quality of service capabilities to optimize IT productivity. Our latest Fibre Channel products are well-suited for use with all-flash arrays by offering best-in-class latency and performance.

***Other Products***

Our other products include printer SoC products and application processors. Our printer SoC products power many of today’s laser and ink printers and multi-function peripherals.

Our application processors are targeted for non-mobile applications and deliver leading-edge performance for today’s embedded and Internet of Things solutions.

***Products Covered by this Report.*** For the purposes of the “Reasonable Country of Origin Inquiry and Due Diligence” portion of this Report,unless otherwise indicated, “**products**” refers to the products in the product categories listed above with respect to which manufacturing was completed during calendar year 2019, and “**suppliers**” refers to, collectively, our direct product suppliers and our component product suppliers.

**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 country 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 suppliers to provide us with accurate information about the origin of the minerals in the products and components they supply to us. Our suppliers provide us with this information by submitting 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 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 a 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-step framework for risk-based due diligence for responsible supply chains of minerals sourced from conflict-affected and high-risk areas.

**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 “Global Citizenship” – “Supplier Responsibility” – “Learn more about Marvell Conflict Minerals Initiatives.”

* Marvell maintains a Supplier Code of Conduct that, among other things, requires our direct 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 was revised in January 2020, and is posted on our website at www.marvell.com under the heading “Global Citizenship” – “Supplier 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 oversees 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. Marvell’s direct suppliers have been provided with our Policy Statement, Supplier Code of Conduct and product and manufacturing specifications (the “**Specifications**”), and any new direct suppliers are similarly provided such documents as part of the Quality Systems group’s supplier onboarding process. Marvell’s Specifications contain provisions requiring that direct 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.
* We engaged a third-party conflict minerals due diligence service provider that utilized a proprietary software tool to compile and validate supplier CMRT data.
* 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 “Company” – “Global Citizenship” – “Ethics.”

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

* We obtained CMRTs from our suppliers two times during the year using a third-party conflict minerals due diligence service provider. We used our suppliers’ 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 RBA 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 the RMI and against additional information obtained either from our customers or by means of our own research to determine whether such facilities have successfully completed an assessment against the applicable RMI Responsible Minerals Assurance Process (“**RMAP**”) standard or an equivalent cross-recognized assessment. The RMI conducts independent third-party audits of smelters’ and refiners’ management systems and sourcing practices to validate conformance with RMAP standards. The RMAP 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 obtaining CMRTs from our suppliers two times a year, and we review their responses, consolidate the information in a central database and follow up with suppliers to address any red flags or inconsistent responses. Some of these activities we handle internally, and some are handled by our third-party conflict minerals due diligence service provider.
* 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, either directly or through our third-party conflict minerals due diligence service provider, we work with our suppliers to transition their processing to RMAP conformant smelters or refiners.
* We have shared with our direct 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.
* 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 appropriate escalation procedures.
* Such escalation procedures 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 2019 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” – “Financials” – “SEC Filings.”

**Conflict Minerals Processing Facilities**

Based on the information provided by our 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 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.

**Country of Origin of Conflict Minerals**

Based on information provided by our 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.

**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 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.

During the 2019 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 the Necessary Conflict Minerals in 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 suppliers’ Conflict Minerals sourcing practices to ensure that our suppliers remain in compliance with our Policy Statement and Supplier Code of Conduct.
* We will continue to engage with our suppliers to obtain updated sourcing information regarding the Conflict Minerals in our supply chain.
* We will continue to support our suppliers’ efforts to encourage their smelters and refiners to obtain a conflict free designation from a third-party audit program.
* We will advise any of our 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.

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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.

**Appendix A**

**Conflict Minerals Processing Facilities Status as of April 5, 2020**

For the 2019 reporting year, our suppliers identified 3411 smelters and refiners as potential sources of the Necessary Conflict Minerals used in our products, and 79 of such smelters and refiners have not successfully completed an assessment against the applicable RMAP standard or an equivalent cross-recognized assessment.

The non-conformance was attributed to smelters and refiners being inoperative, smelters and 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 for the 2019 reporting year.

**Table 1**

**Smelters and Refiners**

**Metal**

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**Smelter Name**

DS PRETECH Co., Ltd.

NH Recytech Company

African Gold Refinery

State Research Institute Center for Physical Sciences and Technology

Safimet S.p.A

Planta Recuperadora de Metales SpA

SungEel HiMetal Co., Ltd.

Pease & Curren

Degussa Sonne / Mond Goldhandel GmbH

Morris and Watson Gold Coast

Kyshtym Copper-Electrolytic Plant ZAO

Bangalore Refinery

Modeltech Sdn Bhd

Universal Precious Metals Refining Zambia

Sai Refinery

GCC Gujrat Gold Centre Pvt. Ltd.

AU Traders and Refiners

Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH

WIELAND Edelmetalle GmbH

SAXONIA Edelmetalle GmbH

Italpreziosi

L’Orfebre S.A.

SAAMP

Abington Reldan Metals, LLC

TOO Tau-Ken-Altyn

Marsam Metals

Korea Zinc Co., Ltd.

Tony Goetz NV

* Out of 341 smelters and refiners disclosed, 331 had unique smelter IDs identified in the RMI CMRT v5.12 published on April 26, 2019. Ten additional smelter names provided by the suppliers did not match a unique smelter ID in the RMI CMRT v5.12 published on April 26, 2019; therefore, their identity could not be verified.

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Remondis Argentia B.V.



T.C.A S.p.A

Sudan Gold Refinery

Kaloti Precious Metals

Emirates Gold DMCC

Al Etihad Gold LLC

Singway Technology Co., Ltd.

KGHM Polska Miedz Spolka Akcyjna

Republic Metals Corporation

MMTC-PAMP India Pvt., Ltd.

Geib Refining Corporation

Umicore Precious Metals Thailand

Guangdong Jinding Gold Limited

Safina a.s.

Morris and Watson

Gold Refinery of Zijin Mining Group Co., Ltd.

Zhongyuan Gold Smelter of Zhongjin Gold Corporation

Yokohama Metal Co., Ltd.

Yamakin Co., Ltd.

Western Australian Mint (T/a The Perth Mint)

Valcambi S.A.

United Precious Metal Refining, Inc.

Umicore S.A. Business Unit Precious Metals Refining

Umicore Brasil Ltda.

Torecom

Tongling Nonferrous Metals Group Co., Ltd.

Tokuriki Honten Co., Ltd.

The Refinery of Shandong Gold Mining Co., Ltd.

Great Wall Precious Metals Co., Ltd. of CBPM

Tanaka Kikinzoku Kogyo K.K.

Sumitomo Metal Mining Co., Ltd.

Solar Applied Materials Technology Corp.

SOE Shyolkovsky Factory of Secondary Precious Metals

Sichuan Tianze Precious Metals Co., Ltd.

Shandong Zhaojin Gold & Silver Refinery Co., Ltd.

Shandong Tiancheng Biological Gold Industrial Co., Ltd.

SEMPSA Joyeria Plateria S.A.

Schone Edelmetaal B.V.

SAMWON METALS Corp.

Samduck Precious Metals

Sabin Metal Corp.

Royal Canadian Mint

Rand Refinery (Pty) Ltd.

PX Precinox S.A.

PT Aneka Tambang (Persero) Tbk

Prioksky Plant of Non-Ferrous Metals

Penglai Penggang Gold Industry Co., Ltd.

PAMP S.A.

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

Ohura Precious Metal Industry Co., Ltd.

Elemetal Refining, LLC

Nihon Material Co., Ltd.

Navoi Mining and Metallurgical Combinat

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

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Moscow Special Alloys Processing Plant



Mitsui Mining and Smelting Co., Ltd.

Mitsubishi Materials Corporation

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

Metalor USA Refining Corporation

Metalor Technologies S.A.

Metalor Technologies (Singapore) Pte., Ltd.

Metalor Technologies (Hong Kong) Ltd.

Metalor Technologies (Suzhou) Ltd.

Matsuda Sangyo Co., Ltd.

Materion

Luoyang Zijin Yinhui Gold Refinery Co., Ltd.

LS-NIKKO Copper Inc.

Lingbao Jinyuan Tonghui Refinery Co., Ltd.

Lingbao Gold Co., Ltd.

L’azurde Company For Jewelry

Kyrgyzaltyn JSC

Kojima Chemicals Co., Ltd.

Kennecott Utah Copper LLC

Kazzinc

Kazakhmys Smelting LLC

JX Nippon Mining & Metals Co., Ltd.

JSC Uralelectromed

JSC Ekaterinburg Non-Ferrous Metal Processing Plant

Asahi Refining Canada Ltd.

Asahi Refining USA Inc.

Jiangxi Copper Co., Ltd.

Japan Mint

Istanbul Gold Refinery

Ishifuku Metal Industry Co., Ltd.

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

HwaSeong CJ Co., Ltd.

Hunan Chenzhou Mining Co., Ltd.

Heraeus Precious Metals GmbH & Co. KG

Heraeus Metals Hong Kong Ltd.

Heimerle + Meule GmbH

HeeSung Metal Ltd.

Hangzhou Fuchunjiang Smelting Co., Ltd.

Guoda Safina High-Tech Environmental Refinery Co., Ltd.

Refinery of Seemine Gold Co., Ltd.

OJSC Novosibirsk Refinery

Eco-System Recycling Co., Ltd.

Dowa

DODUCO Contacts and Refining GmbH

DSC (Do Sung Corporation)

Daye Non-Ferrous Metals Mining Ltd.

Daejin Indus Co., Ltd.

Chugai Mining

Chimet S.p.A.

Yunnan Copper Industry Co., Ltd.

Cendres + Metaux S.A.

CCR Refinery - Glencore Canada Corporation

Caridad

C. Hafner GmbH + Co. KG

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

Boliden AB



Bangko Sentral ng Pilipinas (Central Bank of the Philippines)

Aurubis AG

Atasay Kuyumculuk Sanayi Ve Ticaret A.S.

Asaka Riken Co., Ltd.

Asahi Pretec Corp.

Argor-Heraeus S.A.

AngloGold Ashanti Corrego do Sitio Mineracao

Almalyk Mining and Metallurgical Complex (AMMC)

Allgemeine Gold-und Silberscheideanstalt A.G.

Aida Chemical Industries Co., Ltd.

Advanced Chemical Company

ARY Aurum Plus (private, 100%)

Henan Yuguang Gold & Lead Co., Ltd.

K.A Rasmussen as

Shandong Humon Smelting Co., Ltd.

Shandong Yanggu Xiangguang Co. Ltd.

Shandong Zhongkuang Group Co.,Ltd.

Shenzhen Zhonghenglong Real Industry Co.,Ltd.

So Accurate Group, Inc.

Super Dragon Technology Co., Ltd.

Jiujiang Janny New Material Co., Ltd.

Power Resources Ltd.

Jiangxi Tuohong New Raw Material

Resind Industria e Comercio Ltda.

KEMET Blue Powder

Global Advanced Metals Aizu

Global Advanced Metals Boyertown

H.C. Starck Smelting GmbH & Co. KG

H.C. Starck Ltd.

H.C. Starck Inc.

H.C. Starck Hermsdorf GmbH

H.C. Starck Tantalum and Niobium GmbH

H.C. Starck Co., Ltd.

KEMET Blue Metals

Jiangxi Dinghai Tantalum & Niobium Co., Ltd.

XinXing HaoRong Electronic Material Co., Ltd.

Jiujiang Zhongao Tantalum & Niobium Co., Ltd.

FIR Metals & Resource Ltd.

D Block Metals, LLC

Hengyang King Xing Lifeng New Materials Co., Ltd.

Yichun Jin Yang Rare Metal Co., Ltd.

Ulba Metallurgical Plant JSC

Telex Metals

Taki Chemical Co., Ltd.

Solikamsk Magnesium Works OAO

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

QuantumClean

Ningxia Orient Tantalum Industry Co., Ltd.

NPM Silmet AS

Mitsui Mining and Smelting Co., Ltd.

Mineracao Taboca S.A.

Metallurgical Products India Pvt., Ltd.

LSM Brasil S.A.

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Jiujiang Tanbre Co., Ltd.



JiuJiang JinXin Nonferrous Metals Co., Ltd.

Guangdong Zhiyuan New Material Co., Ltd.

F&X Electro-Materials Ltd.

Exotech Inc.

Duoluoshan

Guangdong Rising Rare Metals-EO Materials Ltd.

Changsha South Tantalum Niobium Co., Ltd.

Asaka Riken Co., Ltd.

Advanced Metallurgical Group N.V. (AMG)

Hi-Temp Specialty Metals, Inc.

Tranzact, Inc.

Zhuzhou Cemented Carbide Group Co. Ltd

Tin Technology & Refining

Pongpipat Company Limited

PT Bangka Serumpun

Chifeng Dajingzi Tin Industry Co., Ltd.

Guangdong Hanhe Non-Ferrous Metal Co., Ltd.

PT Lautan Harmonis Sejahtera

Gejiu Jinye Mineral Company

Modeltech Sdn Bhd

Guanyang Guida Nonferrous Metal Smelting Plant

Gejiu Fengming Metallurgy Chemical Plant

HuiChang Hill Tin Industry Co., Ltd.

PT Menara Cipta Mulia

PT Kijang Jaya Mandiri

PT Sukses Inti Makmur

PT Bangka Prima Tin

Metallo Spain S.L.U.

Metallo Belgium N.V.

Super Ligas

Resind Industria e Comercio Ltda.

An Vinh Joint Stock Mineral Processing Company

CV Tiga Sekawan

CV Dua Sekawan

Tuyen Quang Non-Ferrous Metals Joint Stock Company

Nghe Tinh Non-Ferrous Metals Joint Stock Company

Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company

CV Ayi Jaya

PT Inti Stania Prima

O.M. Manufacturing Philippines, Inc.

PT ATD Makmur Mandiri Jaya

Melt Metais e Ligas S.A.

Magnu’s Minerais Metais e Ligas Ltda.

CV Venus Inti Perkasa

Yunnan Tin Company Limited

Yunnan Chengfeng Non-ferrous Metals Co., Ltd.

White Solder Metalurgia e Mineracao Ltda.

Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.

Thaisarco

Soft Metais Ltda.

Rui Da Hung

PT Tommy Utama

PT Tinindo Inter Nusa

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PT Timah (Persero) Tbk Mentok



PT Timah (Persero) Tbk Kundur

PT Sumber Jaya Indah

PT Stanindo Inti Perkasa

PT Sariwiguna Binasentosa

PT Refined Bangka Tin

PT Prima Timah Utama

PT Panca Mega Persada

PT Mitra Stania Prima

PT Karimun Mining

PT Eunindo Usaha Mandiri

PT DS Jaya Abadi

PT Bukit Timah

PT Belitung Industri Sejahtera

PT Bangka Tin Industry

PT Babel Inti Perkasa

PT Artha Cipta Langgeng

Operaciones Metalurgical S.A.

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

Jiangxi New Nanshan Technology Ltd.

Mitsubishi Materials Corporation

Minsur

Mineracao Taboca S.A.

Metallic Resources, Inc.

Malaysia Smelting Corporation (MSC)

China Tin Group Co., Ltd.

Gejiu Kai Meng Industry and Trade LLC

Huichang Jinshunda Tin Co., Ltd.

Gejiu Zili Mining And Metallurgy Co., Ltd.

Gejiu Non-Ferrous Metal Processing Co., Ltd.

Fenix Metals

Estanho de Rondonia S.A.

EM Vinto

Dowa

CV United Smelting

PT Premium Tin Indonesia

PT Aries Kencana Sejahtera

CV Gita Pesona

Alpha

CNMC (Guangxi) PGMA Co., Ltd.

Jiangxi Ketai Advanced Material Co., Ltd.

Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.

An Thai Minerals Co., Ltd.

Da Nang Processing Import and Export Joint Stock

Feinhütte Halsbrücke GmbH

Hayes Metals Pty Ltd

Hongqiao Metals (Kunshan) Co., Ltd.

PT Babel Surya Alam Lestari

PT Cipta Persada Mulia

PT Justindo

PT Timah Nusantara

PT Wahana Perkit Jaya

VQB Mineral and Trading Group JSC

Zhongshan Jinye Smelting Co., Ltd

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Hunan Litian Tungsten Industry Co., Ltd.



Moliren Ltd.

Woltech Korea Co., Ltd.

ACL Metais Eireli

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

Philippine Chuangxin Industrial Co., Inc.

South-East Nonferrous Metal Company Limited of Hengyang City

Unecha Refractory metals plant

Hydrometallurg, JSC

Jiangxi Dayu Longxintai Tungsten Co., Ltd.

Ganzhou Haichuang Tungsten Co., Ltd.

Niagara Refining LLC

Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji

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

Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC

H.C. Starck Smelting GmbH & Co. KG

H.C. Starck Tungsten GmbH

Ganzhou Yatai Tungsten Co., Ltd.

Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd.

Chenzhou Diamond Tungsten Products Co., Ltd.

Asia Tungsten Products Vietnam Ltd.

Ganzhou Seadragon W & Mo Co., Ltd.

Jiangxi Gan Bei Tungsten Co., Ltd.

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

Malipo Haiyu Tungsten Co., Ltd.

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

Jiangxi Xinsheng Tungsten Industry Co., Ltd.

Jiangxi Yaosheng Tungsten Co., Ltd.

Ganzhou Jiangwu Ferrotungsten Co., Ltd.

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

Xinhai Rendan Shaoguan Tungsten Co., Ltd.

Xiamen Tungsten Co., Ltd.

Wolfram Bergbau und Hutten AG

Vietnam Youngsun Tungsten Industry Co., Ltd.

Tejing (Vietnam) Tungsten Co., Ltd.

Kennametal Fallon

Ganzhou Huaxing Tungsten Products Co., Ltd.

Japan New Metals Co., Ltd.

Hunan Chunchang Nonferrous Metals Co., Ltd.

Hunan Chenzhou Mining Co., Ltd.

Global Tungsten & Powders Corp.

Fujian Jinxin Tungsten Co., Ltd.

Chongyi Zhangyuan Tungsten Co., Ltd.

Guangdong Xianglu Tungsten Co., Ltd.

Kennametal Huntsville

A.L.M.T. Tungsten Corp.

Dayu Weiliang Tungsten Co., Ltd.

Luoyang Mudu Tungsten & Molybdenum Technology Co., Ltd.

Tungsten Diversified Industries LLC

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:

Angola, Argentina, Armenia, Australia, Austria, Azerbaijan, Belarus, Belgium, Benin, Bolivia (Plurinational State of), Botswana, Brazil, Brunei, Bulgaria, Burkina Faso, Burundi, Cameroon, Canada, Chile, China, Colombia, Congo (Democratic Republic of the), Croatia, Cuba\*, Cyprus, Czech Republic, Denmark, Dominican Republic, Ecuador, Egypt, El Salvador, Eritrea, Estonia, Ethiopia, Fiji, Finland, France, Gabon, Gambia (The), Georgia, Germany, Ghana, Greece, Guatemala, Guinea, Guyana, Honduras, Hong Kong, Hungary, Iceland, India, Indonesia, Iran\*, Ireland, Israel, Italy, Ivory Coast, Japan, Jordan, Kazakhstan, Kenya, Korea (Republic of), Kuwait, Kyrgyzstan, Laos, Latvia, Lebanon, Liberia, Liechtenstein, Lithuania, Luxembourg, Macau, Madagascar, Malaysia, Mali, Malta, Mauritania, Mauritius, Mexico, Monaco, Mongolia, Morocco, Mozambique, Myanmar, Namibia, Netherlands, New Caledonia, New Zealand, Nicaragua, Niger, Nigeria, Norway, Pakistan, Panama, Papua New Guinea, Paraguay, Peru, Philippines, Poland, Portugal, Puerto Rico, Qatar, Romania, Russia, Rwanda, San Marino, Saudi Arabia, Senegal, Serbia, Sierra Leone, Singapore, Slovakia, Slovenia, Solomon Islands, Somaliland, South Africa, South Korea, Spain, Sudan\*, Suriname, Swaziland, Sweden, Switzerland, Taiwan, Tajikistan, Tanzania, Thailand, Togo, Trinidad and Tobago, Tunisia, Turkey, Uganda, Ukraine, United Arab Emirates, United Kingdom of Great Britain and Northern Ireland, United States of America, Uruguay, Uzbekistan, Venezuela, Vietnam, Yemen, Zambia, Zimbabwe.

* Minerals from this country were substantially transformed before being incorporated into finished products. Such a substantial transformation of the minerals happened outside of the United States in a third country by a person other than a United States person.