**UNITED STATES**

**SECURITIES AND EXCHANGE COMMISSION**

**Washington, D.C. 20549**



**Form SD**



**SPECIALIZED DISCLOSURE REPORT**



**Marvell Technology, Inc.**

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



**Delaware**

**001-40357**

**85-3971597**

**(State or other jurisdiction of**

**incorporation or organization)**

**(Commission**

**File No.)**

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

**Identification No.)**

**1000 N. West Street, Suite 1200**

**Wilmington, Delaware 19801**

**(Address of principal executive offices)**

**Mitchell L. Gaynor**

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

**(302) 295-4840**

**(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, 2020 to December 31, 2020.



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

**Conflict Minerals Disclosure**

A copy of the Conflict Minerals Report of Marvell Technology, Inc. (the “**Company**”) for the reporting period January 1, 2020 to December 31, 2020 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 | Description |  |
| No. |  |



1.01 [Conflict Minerals Report of Marvell Technology, Inc. for the reporting period January 1, 2020 to December 31, 2020.](#page4)

**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, 2021

**Marvell Technology, Inc.**

By: /s/ Mitchell L. Gaynor



Mitchell L. Gaynor

Executive Vice President, Chief

Administration and Legal Officer and

Secretary

**Exhibit 1.01**

**MARVELL TECHNOLOGY, INC.**

**CONFLICT MINERALS REPORT**

**(For the reporting period January 1, 2020 to December 31, 2020)**

**INTRODUCTION**

This Conflict Minerals Report (the “**Report**”) for Marvell Technology, Inc. (“**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, 2020 to December 31, 2020 and, unless otherwise indicated herein with respect to a particular statement, covers the activities of all Company subsidiaries, including Inphi Corporation (“**Inphi**”), which we acquired on April 20, 2021. 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, and with the exception of certain low-volume products that are assembled and tested at certain California locations, we 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, application processors, and products offered as a result of the acquisition of Inphi.

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.

As a result of our acquisition of Inphi, we provide high-speed analog and mixed signal semiconductor and module solutions for the communications and data center markets. We design and manufacture integrated circuits and modules for optical interconnects and network communications.

***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 2020, 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 “ESG” – “Supplier Responsibility.”
* 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 is posted on our website at www.marvell.com under the heading “ESG” – “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. With the exception of former Inphi 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 for certain suppliers.
* 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” – “ESG” – “Ethics.”

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

* We requested that our suppliers provide CMRTs and used our suppliers’ CMRTs to identify smelters and refiners and to attempt to 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, 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.
* With the exception of former Inphi suppliers, 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 2020 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 2020 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.

\* \* \* \*

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 May 21, 2021**

For the 2020 reporting year, our suppliers identified 3537 smelters and refiners as potential sources of the Necessary Conflict Minerals used in our products, and 109 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 2020 reporting year.

**Table 1**

**Smelters and Refiners**

**Metal**

**Smelter Name**

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8853 S.p.A.

Abington Reldan Metals, LLC

Advanced Chemical Company

African Gold Refinery

Aida Chemical Industries Co., Ltd.

Al Etihad Gold Refinery DMCC

Allgemeine Gold-und Silberscheideanstalt A.G.

Almalyk Mining and Metallurgical Complex (AMMC)

AngloGold Ashanti Corrego do Sitio Mineracao

Argor-Heraeus S.A.

Asahi Pretec Corp.

Asahi Refining Canada Ltd.

Asahi Refining USA Inc.

Asaka Riken Co., Ltd.

Atasay Kuyumculuk Sanayi Ve Ticaret A.S.

AU Traders and Refiners

Augmont Enterprises Private Limited

Aurubis AG

8853 S.p.A.

A.L.M.T. Corp.

Abington Reldan Metals, LLC

ACL Metais Eireli

Advanced Chemical Company

African Gold Refinery

Aida Chemical Industries Co., Ltd.

Al Etihad Gold Refinery DMCC

Albasteel Industria e Comercio de Ligas Para Fundicao Ltd.

Allgemeine Gold-und Silberscheideanstalt A.G.

Almalyk Mining and Metallurgical Complex (AMMC)

* Out of 353 smelters and refiners disclosed, 328 had unique smelter IDs identified in the RMI CMRT v6.1 published on April 28, 2021. Twenty-five additional smelter names provided by the suppliers did not match a unique smelter ID in the RMI CMRT v6.1 published on April 28, 2021; therefore, their identity could not be verified.

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Alpha



An Vinh Joint Stock Mineral Processing Company

AngloGold Ashanti Corrego do Sitio Mineracao

Argor-Heraeus S.A.

Asahi Pretec Corp.

Asahi Refining Canada Ltd.

Asahi Refining USA Inc.

Asaka Riken Co., Ltd.

Asaka Riken Co., Ltd.

Asia Tungsten Products Vietnam Ltd.

Atasay Kuyumculuk Sanayi Ve Ticaret A.S.

AU Traders and Refiners

Augmont Enterprises Private Limited

Aurubis AG

Bangalore Refinery

Bangko Sentral ng Pilipinas (Central Bank of the Philippines)

Boliden AB

C. Hafner GmbH + Co. KG

C.I Metales Procesados Industriales SAS

Caridad

CCR Refinery—Glencore Canada Corporation

Cendres + Metaux S.A.

CGR Metalloys Pvt Ltd.

Changsha South Tantalum Niobium Co., Ltd.

Chenzhou Diamond Tungsten Products Co., Ltd.

Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.

Chifeng Dajingzi Tin Industry Co., Ltd.

Chimet S.p.A.

China Molybdenum Co., Ltd.

China Tin Group Co., Ltd.

Chongyi Zhangyuan Tungsten Co., Ltd.

Chugai Mining

CNMC (Guangxi) PGMA Co., Ltd.

CP Metals Inc.

CV Ayi Jaya

CV Dua Sekawan

CV United Smelting

D Block Metals, LLC

Daye Non-Ferrous Metals Mining Ltd.

Degussa Sonne / Mond Goldhandel GmbH

Dijllah Gold Refinery FZC

DODUCO Contacts and Refining GmbH

Dongguan CiEXPO Environmental Engineering Co., Ltd.

Dowa

Dowa

DS PRETECH Co., Ltd.

DSC (Do Sung Corporation)

Eco-System Recycling Co., Ltd. East Plant

Eco-System Recycling Co., Ltd. North Plant

Eco-System Recycling Co., Ltd. West Plant

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

EM Vinto

Emirates Gold DMCC

Estanho de Rondonia S.A.

Exotech Inc.

F&X Electro-Materials Ltd.

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Fenix Metals



Fidelity Printers and Refiners Ltd.

FIR Metals & Resource Ltd.

Fujairah Gold FZC

Fujian Ganmin RareMetal Co., Ltd.

Fujian Jinxin Tungsten Co., Ltd.

Ganzhou Haichuang Tungsten Co., Ltd.

Ganzhou Huaxing Tungsten Products Co., Ltd.

Ganzhou Jiangwu Ferrotungsten Co., Ltd.

Ganzhou Seadragon W & Mo Co., Ltd.

GCC Gujrat Gold Centre Pvt. Ltd.

Geib Refining Corporation

Gejiu City Fuxiang Industry and Trade Co., Ltd.

Gejiu Fengming Metallurgy Chemical Plant

Gejiu Kai Meng Industry and Trade LLC

Gejiu Non-Ferrous Metal Processing Co., Ltd.

Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.

Gejiu Zili Mining And Metallurgy Co., Ltd.

GEM Co., Ltd.

Global Advanced Metals Aizu

Global Advanced Metals Boyertown

Global Tungsten & Powders Corp.

Gold Coast Refinery

Gold Refinery of Zijin Mining Group Co., Ltd.

Great Wall Precious Metals Co., Ltd. of CBPM

Guangdong Hanhe Non-Ferrous Metal Co., Ltd.

Guangdong Jinding Gold Limited

Guangdong Xianglu Tungsten Co., Ltd.

Guangdong Zhiyuan New Material Co., Ltd.

Guanyang Guida Nonferrous Metal Smelting Plant

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

H.C. Starck Co., Ltd.

H.C. Starck Hermsdorf GmbH

H.C. Starck Inc.

H.C. Starck Ltd.

H.C. Starck Smelting GmbH & Co. KG

H.C. Starck Smelting GmbH & Co. KG

H.C. Starck Tantalum and Niobium GmbH

H.C. Starck Tungsten GmbH

Hangzhou Fuchunjiang Smelting Co., Ltd.

Heimerle + Meule GmbH

Hengyang King Xing Lifeng New Materials Co., Ltd.

Heraeus Metals Hong Kong Ltd.

Heraeus Precious Metals GmbH & Co. KG

HuiChang Hill Tin Industry Co., Ltd.

Huichang Jinshunda Tin Co., Ltd.

Hunan Chenzhou Mining Co., Ltd.

Hunan Chenzhou Mining Co., Ltd.

Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji

Hunan Chunchang Nonferrous Metals Co., Ltd.

Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd.

Hunan Litian Tungsten Industry Co., Ltd.

HwaSeong CJ Co., Ltd.

Hydrometallurg, JSC

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

International Precious Metal Refiners

Gold Ishifuku Metal Industry Co., Ltd.

Gold Istanbul Gold Refinery

Gold Italpreziosi

Gold JALAN & Company

Gold Japan Mint

Gold Japan New Metals Co., Ltd.

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

Gold Jiangxi Copper Co., Ltd.

Gold Jiangxi Dinghai Tantalum & Niobium Co., Ltd.

Gold Jiangxi Gan Bei Tungsten Co., Ltd.

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

Gold Jiangxi New Nanshan Technology Ltd.

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

Gold Jiangxi Tuohong New Raw Material

Gold Jiangxi Xianglu Tungsten Co., Ltd.

Gold Jiangxi Xinsheng Tungsten Industry Co., Ltd.

Gold Jiangxi Yaosheng Tungsten Co., Ltd.

Gold JiuJiang JinXin Nonferrous Metals Co., Ltd.

Gold Jiujiang Tanbre Co., Ltd.

Gold Jiujiang Zhongao Tantalum & Niobium Co., Ltd.

Gold JSC “Kirovgrad Hard Alloys Plant”

Gold JSC Ekaterinburg Non-Ferrous Metal Processing Plant

Gold JSC Uralelectromed

Gold JX Nippon Mining & Metals Co., Ltd.

Gold Kaloti Precious Metals

Gold Kazakhmys Smelting LLC

Gold Kazzinc

Gold KEMET Blue Metals

Gold KEMET Blue Powder

Gold Kennametal Fallon

Gold Kennametal Huntsville

Tantalum Kennecott Utah Copper LLC

Tantalum KGETS Co., Ltd.

Tantalum KGHM Polska Miedz Spolka Akcyjna

Tantalum Kojima Chemicals Co., Ltd.

Tantalum Korea Zinc Co., Ltd.

Tantalum Kundan Care Products Ltd.

Tantalum Kyrgyzaltyn JSC

Tantalum KYSHTYM COPPER-ELECTROLYTIC PLANT ZAO

Tantalum L’azurde Company For Jewelry

Tantalum Lianyou Metals Co., Ltd.

Tantalum Lingbao Gold Co., Ltd.

Tantalum Lingbao Jinyuan Tonghui Refinery Co., Ltd.

Tantalum L’Orfebre S.A.

Tantalum LSM Brasil S.A.

Tantalum LS-NIKKO Copper Inc.

Tantalum LT Metal Ltd.

Tantalum Luna Smelter, Ltd.

Tantalum Luoyang Zijin Yinhui Gold Refinery Co., Ltd.

Tantalum Ma’anshan Weitai Tin Co., Ltd.

Tantalum Magnu’s Minerais Metais e Ligas Ltda.

Tantalum Malaysia Smelting Corporation (MSC)

Tantalum Malipo Haiyu Tungsten Co., Ltd.

Tantalum Marsam Metals

Tantalum Masan Tungsten Chemical LLC (MTC)

Tantalum Materion

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Matsuda Sangyo Co., Ltd.



Melt Metais e Ligas S.A.

Metallic Resources, Inc.

Metallo Belgium N.V.

Metallo Spain S.L.U.

Metallurgical Products India Pvt., Ltd.

Metalor Technologies (Hong Kong) Ltd.

Metalor Technologies (Singapore) Pte., Ltd.

Metalor Technologies (Suzhou) Ltd.

Metalor Technologies S.A.

Metalor USA Refining Corporation

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

Mineracao Taboca S.A.

Mineracao Taboca S.A.

Minsur

Mitsubishi Materials Corporation

Mitsubishi Materials Corporation

Mitsui Mining and Smelting Co., Ltd.

Mitsui Mining and Smelting Co., Ltd.

MMTC-PAMP India Pvt., Ltd.

Modeltech Sdn Bhd

Modeltech Sdn Bhd

Moliren Ltd.

Morris and Watson

Moscow Special Alloys Processing Plant

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

Navoi Mining and Metallurgical Combinat

Nghe Tinh Non-Ferrous Metals Joint Stock Company

NH Recytech Company

Niagara Refining LLC

Nihon Material Co., Ltd.

Ningxia Orient Tantalum Industry Co., Ltd.

Nippon Yakin Kogyo Co., Ltd.

Novosibirsk Processing Plant Ltd.

NPM Silmet AS

NPP Tyazhmetprom LLC

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

O.M. Manufacturing Philippines, Inc.

Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH

Ohura Precious Metal Industry Co., Ltd.

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

OJSC Novosibirsk Refinery

Operaciones Metalurgicas S.A.

PAMP S.A.

Pease & Curren

Penglai Penggang Gold Industry Co., Ltd.

Philippine Chuangxin Industrial Co., Inc.

Planta Recuperadora de Metales SpA

Pongpipat Company Limited

Precious Minerals and Smelting Limited

PRG Dooel

Prioksky Plant of Non-Ferrous Metals

PT Aneka Tambang (Persero) Tbk

PT Aries Kencana Sejahtera

PT Artha Cipta Langgeng

PT ATD Makmur Mandiri Jaya

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PT Babel Inti Perkasa



PT Babel Surya Alam Lestari

PT Bangka Prima Tin

PT Bangka Serumpun

PT Bangka Tin Industry

PT Belitung Industri Sejahtera

PT Bukit Timah

PT DS Jaya Abadi

PT Inti Stania Prima

PT Menara Cipta Mulia

PT Mitra Stania Prima

PT Mitra Sukses Globalindo

PT Premium Tin Indonesia

PT Prima Timah Utama

PT Rajawali Rimba Perkasa

PT Rajehan Ariq

PT REFINED BANGKA TIN

PT Sariwiguna Binasentosa

PT Stanindo Inti Perkasa

PT Sukses Inti Makmur

PT Sumber Jaya Indah

PT Timah Nusantara

PT Timah Tbk Kundur

PT Timah Tbk Mentok

PX Precinox S.A.

QG Refining, LLC

QuantumClean

Rand Refinery (Pty) Ltd.

Refinery of Seemine Gold Co., Ltd.

REMONDIS PMR B.V.

Resind Industria e Comercio Ltda.

Resind Industria e Comercio Ltda.

Royal Canadian Mint

Rui Da Hung

SAAMP

Sabin Metal Corp.

Safimet S.p.A

Safina a.s.

Sai Refinery

Samduck Precious Metals

SAMWON METALS Corp.

SAXONIA Edelmetalle GmbH

SEMPSA Joyeria Plateria S.A.

Shandong Humon Smelting Co., Ltd.

Shandong Tiancheng Biological Gold Industrial Co., Ltd.

Shandong Zhaojin Gold & Silver Refinery Co., Ltd.

Shenzhen Zhonghenglong Real Industry Co., Ltd.

Shirpur Gold Refinery Ltd.

Sichuan Tianze Precious Metals Co., Ltd.

Singway Technology Co., Ltd.

SOE Shyolkovsky Factory of Secondary Precious Metals

Soft Metais Ltda.

Solar Applied Materials Technology Corp.

Solikamsk Magnesium Works OAO

Sovereign Metals

State Research Institute Center for Physical Sciences and Technology

Tungsten Sudan Gold Refinery

Tungsten Sumitomo Metal Mining Co., Ltd.

Tungsten SungEel HiMetal Co., Ltd.

Tungsten Super Ligas

Tungsten T.C.A S.p.A

Tungsten Taki Chemical Co., Ltd.

Tungsten Tanaka Kikinzoku Kogyo K.K.

Tungsten Tejing (Vietnam) Tungsten Co., Ltd.

Tungsten Telex Metals

Tungsten Thai Nguyen Mining and Metallurgy Co., Ltd.

Tungsten Thaisarco

Tungsten The Refinery of Shandong Gold Mining Co., Ltd.

Tungsten Tin Technology & Refining

Tungsten Tokuriki Honten Co., Ltd.

Tungsten Tongling Nonferrous Metals Group Co., Ltd.

Tungsten Tony Goetz NV

Tungsten TOO Tau-Ken-Altyn

Tungsten Torecom

Tungsten Tuyen Quang Non-Ferrous Metals Joint Stock Company

Tungsten Ulba Metallurgical Plant JSC

Tungsten Umicore Brasil Ltda.

Tungsten Umicore Precious Metals Thailand

Tungsten Umicore S.A. Business Unit Precious Metals Refining

Tungsten Unecha Refractory metals plant

Tungsten United Precious Metal Refining, Inc.

Tungsten Valcambi S.A.

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

Tungsten White Solder Metalurgia e Mineracao Ltda.

Tungsten WIELAND Edelmetalle GmbH

Tungsten Wolfram Bergbau und Hutten AG

Tungsten Woltech Korea Co., Ltd.

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

Tungsten Xiamen Tungsten Co., Ltd.

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

Tungsten Xinhai Rendan Shaoguan Tungsten Co., Ltd.

Tungsten XinXing HaoRong Electronic Material Co., Ltd.

Tungsten Yamakin Co., Ltd.

Tungsten Yanling Jincheng Tantalum & Niobium Co., Ltd.

Tungsten Yokohama Metal Co., Ltd.

Tungsten Yunnan Chengfeng Non-ferrous Metals Co., Ltd.

Tungsten Yunnan Copper Industry Co., Ltd.

Tungsten Yunnan Tin Company Limited

Tungsten Yunnan Yunfan Non-ferrous Metals Co., Ltd.

Tungsten Zhongyuan Gold Smelter of Zhongjin Gold Corporation

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, Bermuda, Bolivia, Botswana, Brazil, Brunei, Bulgaria, Burkina Faso, Burundi, Cambodia, Cameroon, Canada, Chile, China, Colombia, Congo, Croatia, Cuba, Cyprus, Denmark, Dominican Republic, Ecuador, Egypt, El Salvador, Eritrea, Estonia, Ethiopia, Fiji, Finland, France, Gabon, Gambia, Georgia, Germany, Ghana, Greece, Guatemala, Guinea, Guyana, Honduras, Hong Kong, Hungary, Iceland, India, Indonesia, Iran, Ireland, Israel, Italy, Ivory Coast, Japan, Jordan, Kazakhstan, Kenya, 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, Republic of Korea, Romania, Russia, Russian Federation, Rwanda, San Marino, Saudi Arabia, Senegal, Serbia, Sierra Leone, Singapore, Slovakia, Slovenia, Solomon Islands, Somaliland, South Africa, Spain, Sudan, Suriname, Swaziland, Sweden, Switzerland, Taiwan, Tajikistan, Tanzania, Thailand, Togo, Trinidad and Tobago, Tunisia, Turkey, Uganda, Ukraine, United Arab Emirates, United Kingdom, United States of America, Uruguay, Uzbekistan, Venezuela, Vietnam, Yemen, Zambia and 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.