

SECURITIES AND EXCHANGE COMMISSION

FORM SD

Specialized Disclosure Report

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Enphase Energy, Inc.


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SIC: **3674** Semiconductors & related devices

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**UNITED STATES
SECURITIES AND EXCHANGE COMMISSION**
Washington, D.C. 20549

FORM SD
Specialized Disclosure Report

 **ENPHASE.**
ENPHASE ENERGY, INC.
(Exact name of registrant as specified in its charter)

Delaware

(State or other jurisdiction of incorporation)

001-35480

(Commission file number)

20-4645388

(IRS Employer Identification No.)

47281 Bayside Parkway
Fremont, CA 94538

(Address of principal executive offices, including zip code)

Lisan Hung
Vice President, General Counsel and Corporate Secretary
(877) 774-7000

(Name and telephone number, including area code, of the person to contact in connection with this report.)

Check the appropriate box to indicate the rule pursuant to which this form is being filed:

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2021.

Rule 13q-1 under the Securities Exchange Act (17 CFR 240.13q-1) for the fiscal year ended _____.

Section 1 - Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

Enphase Energy, Inc. (the “Company”) has evaluated its current products and has determined that certain products it contracts to manufacture contain conflict minerals originating in the Democratic Republic of the Congo or adjoining countries. As a result, the Company has prepared, and is filing with this Form SD, a Conflict Minerals Report. A copy of the Company’s Conflict Minerals Report for the calendar year ended December 31, 2021 is provided as Exhibit 1.01 to the Specialized Disclosure Report and is publicly available on the Company’s corporate website at <http://investor.enphase.com/sec.cfm>.

Item 1.02 Exhibit

The Conflict Minerals Report required by Item 1.01 is filed as Exhibit 1.01 to this Form SD.

Section 3 - Exhibits

Item 3.01 Exhibits

Exhibit Number	Description
1.01	Conflicts Minerals Report for the reporting period January 1, 2021 to December 31, 2021.

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 hereunto duly authorized.

Date: May 31, 2022

ENPHASE ENERGY, INC.

By: /s/ Lisan Hung

Lisan Hung

Vice President, General Counsel and Corporate
Secretary

Enphase Energy, Inc. Conflict Minerals Report

For The Year January 1, 2021 through December 31, 2021

1. Introduction

This Conflict Minerals Report (“CMR”) for the year January 1, 2021 through December 31, 2021 (the “Reporting Period”) is presented to comply with Rule 13p-1 under the Securities Exchange Act of 1934 (the “Rule”). The Rule was adopted by the Securities and Exchange Commission (“SEC”) to implement reporting and disclosure requirements related to conflict minerals as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (“Dodd-Frank Act”). The Rule imposes certain reporting obligations on SEC registrants whose manufactured products contain conflict minerals that are necessary to the functionality or production of their products. Conflict minerals are defined as tin, tantalum, tungsten and gold (“3TG” or “Conflict Minerals”) for the purposes of this assessment. These requirements apply to registrants whatever the geographic origin of the Conflict Minerals and whether they fund armed conflict.

If a registrant can establish that the Conflict Minerals originated from sources other than the Democratic Republic of the Congo (the “DRC”) or an adjoining country, which are the Republic of Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola (collectively with the DRC, the “Covered Countries”), or from recycled and scrap sources, it must submit a completed Form SD that describes the Reasonable Country of Origin Inquiry (the “RCOI”).

If a registrant has reason to believe that any of the Conflict Minerals in its supply chain may have originated in the Covered Countries, or if it is unable to determine the country of origin of those Conflict Minerals, then the registrant must perform due diligence on the Conflict Minerals’ source and chain of custody. The registrant must annually submit a CMR with its Form SD to the SEC that includes a description of those due diligence measures.

2. Company Overview

This CMR has been prepared by management of Enphase Energy, Inc. (herein referred to as “we,” “us” or “our”). The information includes the activities of all majority-owned subsidiaries.

We are a global energy technology company. We deliver smart, easy-to-use solutions that manage solar generation, storage and communication on one platform. We revolutionized the solar industry with our microinverter technology and we produce a fully integrated solar-plus-storage solution. As of March 31, 2022, we have shipped more than 45 million microinverters, and approximately 2.0 million Enphase residential and commercial systems have been deployed in more than 135 countries.

3. Products Overview

The Enphase® Energy System, our current generation integrated solar, storage and energy management offering powered by Enphase IQ® Microinverters and IQ™ Batteries, enables self-consumption and delivers our core value proposition of yielding more energy, simplifying design and installation, and improving system uptime and reliability.

The Enphase Energy System brings a high technology, networked approach to solar generation plus energy storage, by leveraging our design expertise across power electronics, semiconductors and cloud-based software technologies. Our integrated approach to energy solutions maximizes a home’s energy potential while providing advanced monitoring and remote maintenance capabilities. The Enphase Energy System powered by IQ Microinverters uses a single technology platform for seamless management of the whole solution, enabling rapid commissioning with the Enphase Installer App; consumption monitoring with IQ™ Gateway or IQ™ Combiner, Enphase App, a cloud-based energy management platform,

and our IQ Battery. System owners can use the Enphase App to monitor their home's solar generation, energy storage and consumption from any web-enabled device.

Based on our internal assessment, our microinverter products, certain related microinverter accessories, the IQ Gateway and the IQ Battery contain Conflict Minerals that are necessary to the functionality or production of those products. Accordingly, for the purposes of this assessment, only our microinverter products, certain related accessories, the IQ Gateway and the IQ Battery (collectively, the "Covered Products") were considered.

On December 31, 2021, we completed the acquisition of ClipperCreek, Inc. (“ClipperCreek”). ClipperCreek offers electric vehicle charging solutions for residential and commercial customers in the United States. As a privately-held company, ClipperCreek had not previously been obligated to provide a Form SD concerning conflict minerals regarding its products and therefore, its products are not included in the Covered Products addressed in this CMR.

4. Reasonable Country of Origin Inquiry

We rely upon our suppliers to provide information on the origin of 3TG contained in components and materials supplied to us, including sources of 3TG that are supplied to them from sub-tier suppliers. Our suppliers are expected to provide the 3TG sourcing information to us per our Conflict Minerals Policy and Supplier Code of Conduct.

We performed a comprehensive analysis of our product components and the role that suppliers play throughout our manufacturing and product delivery processes. We defined the scope of our RCOI by identifying and reaching out to suppliers that provided components or engaged in manufacturing activities that are likely to contain 3TG during the Reporting Period. During the process of our review, we identified 145 suppliers who were within the scope of RCOI.

We, through our outside agent Flextronics International Ltd. (“Flex”) who assisted us in our RCOI and due diligence efforts, conducted a survey of our active suppliers and sub-suppliers using the template developed jointly by the companies of Electronic Industry Citizenship Coalition® (“EICC”) and The Global e-Sustainability Initiative (“GeSI”), known as the Conflict Free Sourcing Initiative (“CFSI”) Reporting Template (the “CMRT”). The CMRT was developed to facilitate disclosure and communication of information regarding smelters that provide material to a company’s supply chain. The CMRT is widely adopted by many companies in their due diligence processes related to Conflict Minerals.

We continued to seek supply chain responses through March 25, 2022 in preparation of this CMR, and were able to determine the country of origin of most of the Conflict Minerals in our supply chain. We received valid CMRTs from 134 of the 145 suppliers surveyed. The responses were reviewed against criteria developed to determine which suppliers required further engagement.

Due to the breadth, complexity and constant evolution of our products and supply chain, it will take time for all remaining suppliers to verify the origin of all of the Conflict Minerals. In addition, the information provided by suppliers may be inaccurate, incomplete or subject to other irregularities. Moreover, because of our relative location within the supply chain in relation to the actual extraction and transport of Conflict Minerals, our ability to verify the accuracy of information reported by suppliers is limited. By using our supply chain due diligence processes, driving accountability within the supply chain by leveraging the CFSI’s Conflict-Free Smelter Program (“CFSP”), and continuing our outreach efforts, we hope to further develop transparency into our supply chain.

5. Due Diligence Process

5.1 Design of Due Diligence

Our due diligence processes have been designed in conformity with, in all material respects, The Organization for Economic Co-operation and Development (“OECD”) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the related supplements for gold, tin, tantalum and tungsten (“OECD Guidance”), consistent with our position as a downstream company. The OECD Guidance provides a detailed due diligence framework to support responsible global supply chain management of 3TGs and other mineral resources and is currently the leading international framework for raw material due diligence. We, as a purchaser of components and materials, are many steps removed from the mining of conflict minerals, do not purchase raw ore or unrefined conflict minerals, do not purchase minerals directly from smelters or refiners, and do not conduct purchasing activities directly in any of the Covered Countries.

5.2 Establish Strong Company Management Systems

a. Conflict Minerals Policy

There has been increased awareness regarding the human rights violations in the mining of certain minerals from the Covered Countries. Through the Dodd-Frank Act, publicly traded companies have been chartered to practice reasonable due diligence with their supply chain to determine if Conflict Minerals used in their products are being sourced from mines controlled by non-government or unlawful military groups within the Covered Countries. We are committed to taking all steps to comply with the legislation and are committed to sourcing components and materials from companies that share our values around human rights, ethics and environmental responsibility.

We continue to develop and implement a strategy to support the objectives to the U.S. regulations on

the supply of Conflict Minerals, including:

- Developing and implementing policies and processes toward preventing the use of Conflict Minerals or derivative metals necessary to the functionality or production of our product(s) that finance or benefit armed groups in the Covered Countries.
- Not knowingly procuring specified minerals that originate from facilities in the Covered Counties that are not certified as conflict free.
- Expecting our suppliers to: (i) provide us with Conflict Mineral content and country of origin information on the products it supplies to us; (ii) cooperate with us (or an independent third party auditor) in any review of its supply chain and procurement process, Conflict Mineral audits, and due diligence on its suppliers as required for our annual SEC disclosure in compliance with the Dodd-Frank Act; and (iii) collaborate with us in developing a chain of custody for these Conflict Minerals in the supply chain and identifying and sourcing conflict-free sources for the minerals used in our products.
- Expecting suppliers whose products contain Conflict Minerals to establish policies, due diligence frameworks and management systems consistent with the OECD Guidance that are designed to accomplish this goal and requiring their suppliers to do the same.

We believe in establishing and maintaining long-term relationships with suppliers whenever possible. We have adopted a policy on Conflict Minerals, which is available at <https://enphase.com/en-us/conflict-minerals-policy>.

b. Internal Team

We have established a management system for complying with the applicable rules. Our management system is led by our Vice President of Supply Chain. They are supported by a team from relevant functions such as legal, purchasing, quality assurance, manufacturing and environmental health and safety. The Vice President of Supply Chain is responsible for implementing our Conflict Minerals compliance strategy.

c. Control Systems

As we do not have a direct relationship with 3TG smelters and refiners, we utilize industry-wide initiatives such as the EICC-GeSI and CFSI to disclose upstream actors in the supply chain. We use the CMRT to gather information on the chain of custody of the 3TG included in our products.

d. Supplier Engagement

We have engaged Flex to reach out to our suppliers and sub-suppliers who have yet to participate in CFSP's audit program or have been audited, but are not yet completely certified conflict free. We encourage these suppliers to participate in CFSP's audit program and move towards a conflict free designation as soon as possible. We will endeavor to continually improve our supply chain due diligence by seeking from our material suppliers an acknowledgment of our Supplier Code of Conduct, and, to the extent practicable, incorporating Conflict Minerals language in supplier agreements, as they arise.

e. Grievance Mechanism

We have established a Conflict Minerals Policy and a Supplier Code of Conduct in addition to multiple longstanding mechanisms whereby employees and suppliers can report violations of our policies.

f. Records Maintenance

We have established our due diligence compliance process and set forth a documentation and record maintenance mechanism to ensure the retention of relevant documentation in a secured electronic database for appropriate periods.

5.2 Identify and Assess Risks in the Supply Chain

Because of the complexity of our products, and the depth, breadth and constant evolution of our supply chain, it is difficult to identify sources upstream from our direct suppliers. We engaged Flex to manage the process of requesting in-scope suppliers to complete and submit the CMRT to gather information on our supply chain. The CMRT includes questions on: (i) whether any of the minerals which could potentially be classified as 3TG are intentionally added to the products manufactured by the supplier; (ii) whether any of the minerals which could potentially be classified as 3TG are necessary to the functionality or production of the products manufactured by the supplier; (iii) whether any of the smelters in the supplier's supply chain sourced those minerals from a Covered Country; (iv) whether 100% of those minerals came from a recycler or scrap supplier; (v) whether any smelter in the supplier's supply chain, from which the source of the minerals is unknown, is located in a Covered Country; (vi) whether the supplier had received conflict mineral information from all relevant suppliers of 3TG; and (vii) the identity of the smelters and refiners of those minerals.

5.3 Design and Implement a Strategy to Respond to Identified Risks

As we move towards further developing our due diligence program, we intend to further enhance supplier communication, training and escalation processes to improve due diligence data accuracy and completion and continue to influence additional smelters to be designated as "conflict-free" through an independent third-party audit program such as the CFSP through our supply chain, where possible. To the extent we are able to determine in the future that we are sourcing from non-conflict free smelters, we plan to move toward using conflict free smelters within a reasonable time frame.

In addition, 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 most are handled by our third-party conflict minerals due diligence service provider, Flex.

5.4 Independent Third-Party Audit of Supply Chain Due Diligence at Identified Points in the Supply Chain

We do not have a direct relationship with 3TG smelters and refiners, nor do we perform direct audits of these entities that provide 3TG to our supply chain. However, we do rely upon the industry initiatives (for example, the CFSI), as well as industry efforts to influence smelters and refiners to be certified through independent third-party audit programs, such as the CFSP.

5.5 Report on Supply Chain Due Diligence

This CMR and our Form SD will be filed with the SEC, and this CMR is publicly available on our website at www.enphaseenergy.com.

6. Due Diligence Results

6.1 Survey Response

We received 134 completed CMRTs from the 145 suppliers surveyed (a 92.41% completion rate). Of the 134 suppliers that provided complete responses to our survey, 120 indicated that they do not source Conflict Minerals or certified that they are conflict free as follows: a) 16 indicated that they do not source Conflict Minerals at all; b) 36 confirmed that the Conflict Minerals they sourced did not originate in the Covered Countries; and c) 68 reported that their Conflict Minerals were sourced solely from smelters and refiners that are certified conflict free. 14 suppliers reported that they are still in the process of completing due diligence. Of the 14, five suppliers reported that the origin of the smelters and refiners is unknown.

Supplier Response	2021	2020	2019
Supplier CMRT Completion Rate	92.41% (134 of 145)	90.14% (128 of 142)	82.24% (125 of 152)

Status of Suppliers	2021	2020	2019
Conflict Minerals Not Originating in Covered Countries or Certified Conflict Free	89.55% (120 of 134)	96.10% (123 of 128)	93.60% (117 of 125)
Still Completing Due Diligence or Origins Unknown or No Information Provided	10.45% (14 of 134)	3.90% (5 of 128)	6.40% (8 of 125)

94 of the 134 suppliers that responded to our survey provided responses on a company-wide or on a user defined basis that was not specifically applicable to components or types of components furnished to us. That is, they were unable to represent that 3TG from the smelters or refiners identified had actually been included in the components supplied to us or our direct suppliers. Of the 94, 68 suppliers reported on a company-wide basis and 57 of those confirm that they are certified conflict free.

6.2 Efforts to Determine Country of Origin of Mine or 3TG

Tracing materials back to the mine of origin is a complex aspect of responsible sourcing in our supply chain. By adopting methodology outlined by the CFSI's joint industry programs and outreach initiatives and requiring that our suppliers conform with standards that meets the OECD Guidance and report to us using the CMRT, we have determined that seeking information about 3TG smelters and refiners in our supply chain represents the most reasonable effort we can make to determine the mines or location of origin of the 3TG in our supply chain and responses to such inquiries represents the most reasonable known mine of origin information available. Through this industry joint effort, we have made reasonable efforts to make a reasonable determination of the mines or locations of origin of the 3TG in our supply chain.

6.3 Smelters or Refiners Identified

We were unable to ascertain the specific country of origin and/or chain of custody of all necessary Conflict Minerals processed by the facilities that contributed to our Covered Products because, for this Reporting Period, 11 suppliers (7.59% of total suppliers included in the RCOI scope) either did not complete the CMRT, provided invalid information, or indicated that they are still in the process of completing due diligence or that the origin of one or more of their smelters and refiners is unknown.

In total, 251 smelters and refiners were identified as potentially in our supply chain. Of those 251 smelters and refiners, 230 are currently certified conflict free, nine are on the CFSP "Active List" and are currently in the process of becoming compliant, are in communication with CFSP, and are currently participating or have agreed to participate in the audit process. None of the smelters and refiners are identified as noncompliant, none of the smelters and refiners failed to provide any response, and 12 require outreach and are not currently certified conflict free or their status is unknown. We found no reasonable basis for concluding that any of these smelters or refiners sourced Conflict Minerals that finance or benefit armed groups. Set forth in [Annex 1](#) is the list as of March 24, 2022 of all known smelters and refiners identified as potentially being in our supply chain.

Status of All Identified Smelters and Refiners	2021	2020	2019
Certified Conflict Free	91.63% (230 of 251)	74.84% (241 of 322)	87.25% (260 of 298)
Currently Participating, In Communication, or Agreed to Participate in Audit Process	3.59% (9 of 251)	9.01% (29 of 322)	1.01% (3 of 298)
Outreach Required	4.78% (12 of 251)	16.15% (52 of 322)	8.39% (25 of 298)

7. Conflict Minerals Status Analysis and Conflict Status Conclusion

We have determined that a portion of the conflict minerals contained in the Covered Products originated from the Covered Countries, but we were unable to determine the origin of all the conflict minerals in our Covered Products. Therefore, we are unable to conclusively determine the country of origin of the Necessary Conflict Minerals in all our products. Because

we have not described any of our products as “DRC conflict free,” an independent private sector audit is not required to be conducted under Rule 13p-1, based on guidance from the SEC’s staff, and therefore has not been conducted.

8. Steps to be taken to mitigate risk

We will continue to communicate our expectations and information requirements to our direct suppliers and continue to work towards a conflict-free supply chain. In addition, we will continue to make inquiries of our direct suppliers and undertake additional risk assessments when potentially relevant changes in facts or circumstances are identified. If we become aware of a supplier whose due diligence process or reporting needs improvement, we currently intend to continue the trade relationship while that supplier improves its compliance program. We expect our direct suppliers to take similar measures with their suppliers to ensure alignment throughout the supply chain.

In addition to the plans described above, we will continue to undertake the following steps during the next reporting

period:

- Continue to engage with suppliers to obtain current, accurate and complete information about the supply chain;
- Continue to support supply chain transparency efforts;
- Continue to include obligations in our new supplier contracts consistent with our policy on conflict minerals; and
- Continue to review and refine the list of in-scope suppliers to facilitate additional focus on those suppliers currently supplying components likely to introduce 3TG into our supply chain.

Cautionary Note on Forward-Looking Statements

This CMR contains links to internal websites for informational purposes only. References to such websites and information available through such websites are not incorporated into this CMR. Additionally, this CMR includes forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995. Investors are cautioned that statements in this CMR that are not strictly historical statements, including without limitation, our intentions and expectations regarding further supplier engagement and risk mitigation efforts and strategy, constitute forward-looking statements that involve risks and uncertainties. Actual results could differ materially from the forward-looking statements. Risks and uncertainties that could cause actual results to differ include, without limitation, risks and uncertainties associated with the progress of industry and other supply chain transparency and smelter or refiner validation programs for Conflict Minerals (including the possibility of inaccurate information, fraud and other irregularities), inadequate supplier education and knowledge, limitations on the ability or willingness of suppliers to provide more accurate, complete and detailed information and limitations on our ability to verify the accuracy or completeness of any supply chain information provided by suppliers or others.

Annex 1

Metal	Comments	Smelter Name	Smelter Country	Smelter Identification
Gold	Conformant	8853 S.p.A.	ITALY	CID002763
Gold	Conformant	Advanced Chemical Company	UNITED STATES OF AMERICA	CID000015
Gold	Conformant	Aida Chemical Industries Co., Ltd.	JAPAN	CID000019
Gold	Conformant	Al Etihad Gold Refinery DMCC	UNITED ARAB EMIRATES	CID002560
Gold	Conformant	Allgemeine Gold-und Silberscheideanstalt A.G.	GERMANY	CID000035
Gold	Conformant	Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN	CID000041
Gold	Conformant	AngloGold Ashanti Corrego do Sitio Mineracao	BRAZIL	CID000058
Gold	Conformant	Argor-Heraeus S.A.	SWITZERLAND	CID000077
Gold	Conformant	Asahi Pretec Corp.	JAPAN	CID000082
Gold	Conformant	Asahi Refining Canada Ltd.	CANADA	CID000924
Gold	Conformant	Asahi Refining USA Inc.	UNITED STATES OF AMERICA	CID000920
Gold	Conformant	Asaka Riken Co., Ltd.	JAPAN	CID000090
Gold	Conformant	Aurubis AG	GERMANY	CID000113
Gold	Conformant	Bangalore Refinery	INDIA	CID002863
Gold	Conformant	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES	CID000128
Gold	Conformant	Boliden AB	SWEDEN	CID000157
Gold	Conformant	C. Hafner GmbH + Co. KG	GERMANY	CID000176
Gold	Conformant	CCR Refinery - Glencore Canada Corporation	CANADA	CID000185
Gold	Conformant	Cendres + Metaux S.A.	SWITZERLAND	CID000189
Gold	Conformant	Chimet S.p.A.	ITALY	CID000233
Gold	Conformant	Chugai Mining	JAPAN	CID000264
Gold	Conformant	DSC (Do Sung Corporation)	KOREA, REPUBLIC OF	CID000359
Gold	Conformant	DODUCO Contacts and Refining GmbH	GERMANY	CID000362
Gold	Conformant	Dowa	JAPAN	CID000401
Gold	Not Applicable	TSK Pretech	KOREA, REPUBLIC OF	CID003195
Gold	Conformant	Eco-System Recycling Co., Ltd. East Plant	JAPAN	CID000425
Gold	Conformant	Eco-System Recycling Co., Ltd. North Plant	JAPAN	CID003424
Gold	Conformant	Eco-System Recycling Co., Ltd. West Plant	JAPAN	CID003425
Gold	Conformant	Emirates Gold DMCC	UNITED ARAB EMIRATES	CID002561
Gold	Non Conformant	JSC Novosibirsk Refinery	RUSSIAN FEDERATION	CID000493
Gold	Conformant	Geib Refining Corporation	UNITED STATES OF AMERICA	CID002459
Gold	Conformant	LT Metal Ltd.	KOREA, REPUBLIC OF	CID000689
Gold	Conformant	Heimerle + Meule GmbH	GERMANY	CID000694
Gold	Conformant	Heraeus Metals Hong Kong Ltd.	CHINA	CID000707
Gold	Conformant	Heraeus Germany GmbH Co. KG	GERMANY	CID000711
Gold	Conformant	Inner Mongolia Ojankun Gold and Silver Refinery Share Co., Ltd.	CHINA	CID000801

Metal	Comments	Smelter Name	Smelter Country	Smelter Identification
Gold	Conformant	Jiangxi Copper Co., Ltd.	CHINA	CID000855
Gold	Non Conformant	JSC Uralelectromed	RUSSIAN FEDERATION	CID000929
Gold	Conformant	JX Nippon Mining & Metals Co., Ltd.	JAPAN	CID000937
Gold	Conformant	Kazzinc	KAZAKHSTAN	CID000957
Gold	Conformant	Kennecott Utah Copper LLC	UNITED STATES OF AMERICA	CID000969
Gold	Conformant	KGHM Polska Miedz Spolka Akcyjna	POLAND	CID002511
Gold	Conformant	Kojima Chemicals Co., Ltd.	JAPAN	CID000981
Gold	Conformant	Korea Zinc Co., Ltd.	KOREA, REPUBLIC OF	CID002605
Gold	Conformant	L'Orfebres S.A.	ANDORRA	CID002762
Gold	Conformant	LS-NIKKO Copper Inc.	KOREA, REPUBLIC OF	CID001078
Gold	Conformant	Marsam Metals	BRAZIL	CID002606
Gold	Conformant	Materion	UNITED STATES OF AMERICA	CID001113
Gold	Conformant	Matsuda Sangyo Co., Ltd.	JAPAN	CID001119
Gold	Conformant	Metalor Technologies (Hong Kong) Ltd.	CHINA	CID001149
Gold	Conformant	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE	CID001152
Gold	Conformant	Metalor Technologies (Suzhou) Ltd.	CHINA	CID001147
Gold	Conformant	Metalor Technologies S.A.	SWITZERLAND	CID001153
Gold	Conformant	Metalor USA Refining Corporation	UNITED STATES OF AMERICA	CID001157
Gold	Conformant	Metalurgica Met-Mex Penoles S.A. De C.V.	MEXICO	CID001161
Gold	Conformant	Mitsubishi Materials Corporation	JAPAN	CID001188
Gold	Conformant	Mitsui Mining and Smelting Co., Ltd.	JAPAN	CID001193
Gold	Conformant	MMTC-PAMP India Pvt., Ltd.	INDIA	CID002509
Gold	Non Conformant	Moscow Special Alloys Processing Plant	RUSSIAN FEDERATION	CID001204
Gold	Conformant	Nadir Metal Rafineri San. Ve Tic. A.S.	TURKEY	CID001220
Gold	Conformant	Navoi Mining and Metallurgical Combinat	UZBEKISTAN	CID001236
Gold	Conformant	Nihon Material Co., Ltd.	JAPAN	CID001259
Gold	Conformant	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	AUSTRIA	CID002779
Gold	Conformant	Ohura Precious Metal Industry Co., Ltd.	JAPAN	CID001325
Gold	Non Conformant	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	RUSSIAN FEDERATION	CID001326
Gold	Conformant	PAMP S.A.	SWITZERLAND	CID001352
Gold	Conformant	Planta Recuperadora de Metales SpA	CHILE	CID002919
Gold	Non Conformant	Prioksky Plant of Non-Ferrous Metals	RUSSIAN FEDERATION	CID001386
Gold	Conformant	PT Aneka Tambang (Persero) Tbk	INDONESIA	CID001397
Gold	Conformant	PX Precinox S.A.	SWITZERLAND	CID001498
Gold	Conformant	Rand Refinery (Pty) Ltd.	SOUTH AFRICA	CID001512
Gold	Conformant	REMONDIS PMR B.V.	NETHERLANDS	CID002582
Gold	Conformant	Royal Canadian Mint	CANADA	CID001534
Gold	Conformant	SAAMP	FRANCE	CID002761
Gold	Conformant	Safimet S.p.A.	ITALY	CID002973
Gold	Conformant	SAFINA A S	CZECHIA	CID002290

Metal	Comments	Smelter Name	Smelter Country	Smelter Identification
Gold	Conformant	Sichuan Tianze Precious Metals Co., Ltd.	CHINA	CID001736
Gold	Conformant	Singway Technology Co., Ltd.	TAIWAN, PROVINCE OF CHINA	CID002516
Gold	Non Conformant	SOE Shyolkovsky Factory of Secondary Precious Metals	RUSSIAN FEDERATION	CID001756
Gold	Conformant	Solar Applied Materials Technology Corp.	TAIWAN, PROVINCE OF CHINA	CID001761
Gold	Conformant	Sumitomo Metal Mining Co., Ltd.	JAPAN	CID001798
Gold	Conformant	SungEel HiMetal Co., Ltd.	KOREA, REPUBLIC OF	CID002918
Gold	Conformant	T.C.A S.p.A	ITALY	CID002580
Gold	Conformant	Tanaka Kikinzoku Kogyo K.K.	JAPAN	CID001875
Gold	Conformant	Shandong Gold Smelting Co., Ltd.	CHINA	CID001916
Gold	Conformant	Tokuriki Honten Co., Ltd.	JAPAN	CID001938
Gold	Conformant	TOO Tau-Ken-Altyn	KAZAKHSTAN	CID002615
Gold	Conformant	Torecom	KOREA, REPUBLIC OF	CID001955
Gold	Conformant	Umicore Precious Metals Thailand	THAILAND	CID002314
Gold	Conformant	Umicore S.A. Business Unit Precious Metals Refining	BELGIUM	CID001980
Gold	Conformant	United Precious Metal Refining, Inc.	UNITED STATES OF AMERICA	CID001993
Gold	Conformant	Valcambi S.A.	SWITZERLAND	CID002003
Gold	Conformant	Western Australian Mint (T/a The Perth Mint)	AUSTRALIA	CID002030
Gold	Conformant	WIELAND Edelmetalle GmbH	GERMANY	CID002778
Gold	Conformant	Yamakin Co., Ltd.	JAPAN	CID002100
Gold	Conformant	Yokohama Metal Co., Ltd.	JAPAN	CID002129
Gold	Conformant	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA	CID002224
Gold	Conformant	Gold Refinery of Zijin Mining Group Co., Ltd.	CHINA	CID002243
Gold	Active	C.I Metales Procesados Industriales SAS	COLOMBIA	CID003421
Gold	Conformant	Metal Concentrators SA (Pty) Ltd.	SOUTH AFRICA	CID003575
Tantalum	Conformant	Asaka Riken Co., Ltd.	JAPAN	CID000092
Tantalum	Conformant	Changsha South Tantalum Niobium Co., Ltd.	CHINA	CID000211
Tantalum	Conformant	Guangdong Rising Rare Metals-EO Materials Ltd.	CHINA	CID000291
Tantalum	Conformant	D Block Metals, LLC	UNITED STATES OF AMERICA	CID002504
Tantalum	Conformant	Exotech Inc.	UNITED STATES OF AMERICA	CID000456
Tantalum	Conformant	F&X Electro-Materials Ltd.	CHINA	CID000460
Tantalum	Conformant	FIR Metals & Resource Ltd.	CHINA	CID002505
Tantalum	Conformant	Global Advanced Metals Aizu	JAPAN	CID002558
Tantalum	Conformant	Global Advanced Metals Boyertown	UNITED STATES OF AMERICA	CID002557
Tantalum	Conformant	XIMEI RESOURCES (GUANGDONG)	CHINA	CID000616

Metal	Comments	Smelter Name	Smelter Country	Smelter Identification
Tantalum	Conformant	TANIOBIS Smelting GmbH & Co. KG	GERMANY	CID002550
Tantalum	Conformant	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA	CID002492
Tantalum	Conformant	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHINA	CID002512
Tantalum	Conformant	Jiangxi Tuohong New Raw Material	CHINA	CID002842
Tantalum	Conformant	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINA	CID000914
Tantalum	Conformant	Jiujiang Tanbre Co., Ltd.	CHINA	CID000917
Tantalum	Conformant	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA	CID002506
Tantalum	Conformant	KEMET de Mexico	MEXICO	CID002539
Tantalum	Conformant	LSM Brasil S.A.	BRAZIL	CID001076
Tantalum	Conformant	Metallurgical Products India Pvt., Ltd.	INDIA	CID001163
Tantalum	Conformant	Mineracao Taboca S.A.	BRAZIL	CID001175
Tantalum	Conformant	Mitsui Mining and Smelting Co., Ltd.	JAPAN	CID001192
Tantalum	Conformant	NPM Silmet AS	ESTONIA	CID001200
Tantalum	Conformant	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA	CID001277
Tantalum	Conformant	Meta Materials	NORTH MACEDONIA, REPUBLIC OF	CID002847
Tantalum	Conformant	QuantumClean	UNITED STATES OF AMERICA	CID001508
Tantalum	Conformant	Resind Industria e Comercio Ltda.	BRAZIL	CID002707
Tantalum	Conformant	Yanling Jincheng Tantalum & Niobium Co., Ltd.	CHINA	CID001522
Tantalum	Conformant	Solikamsk Magnesium Works OAO	RUSSIAN FEDERATION	CID001769
Tantalum	Conformant	Taki Chemical Co., Ltd.	JAPAN	CID001869
Tantalum	Conformant	Telex Metals	UNITED STATES OF AMERICA	CID001891
Tantalum	Conformant	Ulba Metallurgical Plant JSC	KAZAKHSTAN	CID001969
Tantalum	Conformant	XinXing HaoRong Electronic Material Co., Ltd.	CHINA	CID002508
Tin	Conformant	Alpha	UNITED STATES OF AMERICA	CID000292
Tin	Conformant	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CHINA	CID000228
Tin	Conformant	Chifeng Dajingzi Tin Industry Co., Ltd.	CHINA	CID003190
Tin	Conformant	China Tin Group Co., Ltd.	CHINA	CID001070
Tin	Conformant	PT Rajehan Ariq	INDONESIA	CID002593
Tin	Active	CV Venus Inti Perkasa	INDONESIA	CID002455
Tin	Conformant	Dowa	JAPAN	CID000402
Tin	Conformant	Metallo Spain S.L.U.	SPAIN	CID002774
Tin	Conformant	EM Vinto	BOLIVIA (PLURINATIONAL STATE OF)	CID000438
Tin	Conformant	Estanho de Rondonia S.A.	BRAZIL	CID000448
Tin	Conformant	Fenix Metals	POLAND	CID000468
Tin	Conformant	Geiju Non-Ferrous Metal Processing Co.	CHINA	CID000538

Metal	Comments	Smelter Name	Smelter Country	Smelter Identification
Tin	Conformant	Ma'anshan Weitai Tin Co., Ltd.	CHINA	CID003379
Tin	Conformant	Magnu's Minerai's Metais e Ligas Ltda.	BRAZIL	CID002468
Tin	Conformant	Malaysia Smelting Corporation (MSC)	MALAYSIA	CID001105
Tin	Conformant	Melt Metais e Ligas S.A.	BRAZIL	CID002500
Tin	Conformant	Metallic Resources, Inc.	UNITED STATES OF AMERICA	CID001142
Tin	Conformant	Metallo Belgium N.V.	BELGIUM	CID002773
Tin	Conformant	Mineracao Taboca S.A.	BRAZIL	CID001173
Tin	Conformant	Minsur	PERU	CID001182
Tin	Conformant	Mitsubishi Materials Corporation	JAPAN	CID001191
Tin	Conformant	Jiangxi New Nanshan Technology Ltd.	CHINA	CID001231
Tin	Conformant	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND	CID001314
Tin	Conformant	O.M. Manufacturing Philippines, Inc.	PHILIPPINES	CID002517
Tin	Conformant	Operaciones Metalurgicas S.A.	BOLIVIA (PLURINATIONAL STATE OF)	CID001337
Tin	Conformant	PT Artha Cipta Langgeng	INDONESIA	CID001399
Tin	Conformant	PT ATD Makmur Mandiri Jaya	INDONESIA	CID002503
Tin	Conformant	PT Babel Inti Perkasa	INDONESIA	CID001402
Tin	Conformant	PT Babel Surya Alam Lestari	INDONESIA	CID001406
Tin	Conformant	PT Bangka Serumpun	INDONESIA	CID003205
Tin	Active	PT Bukit Timah	INDONESIA	CID001428
Tin	Conformant	PT Menara Cipta Mulia	INDONESIA	CID002835
Tin	Conformant	PT Mitra Stania Prima	INDONESIA	CID001453
Tin	Active	PT Timah Nusantara	INDONESIA	CID001486
Tin	Conformant	PT Prima Timah Utama	INDONESIA	CID001458
Tin	Conformant	PT Rajawali Rimba Perkasa	INDONESIA	CID003381
Tin	Conformant	PT Refined Bangka Tin	INDONESIA	CID001460
Tin	Conformant	PT Stanindo Inti Perkasa	INDONESIA	CID001468
Tin	Active	PT Sukses Inti Makmur	INDONESIA	CID002816
Tin	Conformant	PT Timah Tbk Kundur	INDONESIA	CID001477
Tin	Conformant	PT Timah Tbk Mentok	INDONESIA	CID001482
Tin	Conformant	PT Tinindo Inter Nusa	INDONESIA	CID001490
Tin	Conformant	Resind Industria e Comercio Ltda.	BRAZIL	CID002706
Tin	Conformant	Rui Da Hung	TAIWAN, PROVINCE OF CHINA	CID001539
Tin	Conformant	Soft Metais Ltda.	BRAZIL	CID001758
Tin	Active	Super Ligas	BRAZIL	CID002756
Tin	Conformant	Thai Nguyen Mining and Metallurgy Co., Ltd.	VIET NAM	CID002834
Tin	Conformant	Thaisarco	THAILAND	CID001898
Tin	Conformant	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	CHINA	CID001908
Tin	Conformant	Tin Technology & Refining	UNITED STATES OF AMERICA	CID003325

Metal	Comments	Smelter Name	Smelter Country	Smelter Identification
Tungsten	Conformant	Asia Tungsten Products Vietnam Ltd.	VIET NAM	CID002502
Tungsten	Conformant	Chenzhou Diamond Tungsten Products Co., Ltd.	CHINA	CID002513
Tungsten	Conformant	China Molybdenum Tungsten Co., Ltd.	CHINA	CID002641
Tungsten	Conformant	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA	CID000258
Tungsten	Conformant	Fujian Ganmin RareMetal Co., Ltd.	CHINA	CID003401
Tungsten	Conformant	Ganzhou Haichuang Tungsten Co., Ltd.	CHINA	CID002645
Tungsten	Conformant	Ganzhou Huaxing Tungsten Products Co., Ltd.	CHINA	CID000875
Tungsten	Conformant	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHINA	CID002315
Tungsten	Conformant	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA	CID002494
Tungsten	Conformant	Global Tungsten & Powders Corp.	UNITED STATES OF AMERICA	CID000568
Tungsten	Conformant	Guangdong Xianglu Tungsten Co., Ltd.	CHINA	CID000218
Tungsten	Conformant	H.C. Starck Tungsten GmbH	GERMANY	CID002541
Tungsten	Conformant	TANIOBIS Smelting GmbH & Co. KG	GERMANY	CID002542
Tungsten	Conformant	Hunan Chenzhou Mining Co., Ltd.	CHINA	CID000766
Tungsten	Not Applicable	Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji	CHINA	CID002579
Tungsten	Conformant	Hunan Chunchang Nonferrous Metals Co., Ltd.	CHINA	CID000769
Tungsten	Not Applicable	Hunan Litan Tungsten Industry Co., Ltd.	CHINA	CID003182
Tungsten	Conformant	Hydrometallurg, JSC	RUSSIAN FEDERATION	CID002649
Tungsten	Conformant	Japan New Metals Co., Ltd.	JAPAN	CID000825
Tungsten	Conformant	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA	CID002551
Tungsten	Conformant	Jiangxi Gan Bei Tungsten Co., Ltd.	CHINA	CID002321
Tungsten	Conformant	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHINA	CID002318
Tungsten	Conformant	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CHINA	CID002317
Tungsten	Conformant	Jiangxi Yaosheng Tungsten Co., Ltd.	CHINA	CID002316
Tungsten	Conformant	JSC "Kirovgrad Hard Alloys Plant"	RUSSIAN FEDERATION	CID003408
Tungsten	Conformant	Kennametal Fallon	UNITED STATES OF AMERICA	CID000966
Tungsten	Conformant	Kennametal Huntsville	UNITED STATES OF AMERICA	CID000105
Tungsten	Conformant	KGETS Co., Ltd.	KOREA, REPUBLIC OF	CID003388
Tungsten	Conformant	Lianyou Metals Co., Ltd.	TAIWAN, PROVINCE OF CHINA	CID003407
Tungsten	Conformant	Malipo Haiyu Tungsten Co., Ltd.	CHINA	CID002319
Tungsten	Conformant	Moliren Ltd.	RUSSIAN FEDERATION	CID002845
Tungsten	Conformant	Niagara Refining LLC	UNITED STATES OF AMERICA	CID002589
Tungsten	Conformant	Masan High-Tech Materials	VIET NAM	CID002543
Tungsten	Conformant	Philippine Chuangxin Industrial Co. Inc	PHILIPPINES	CID002827
Tungsten	Conformant	Unecha Refractory metals plant	RUSSIAN FEDERATION	CID002724

Metal	Comments	Smelter Name	Smelter Country	Smelter Identification
Tungsten	Conformant	Cronimet Brasil Ltda	BRAZIL	CID003468
Tin	Active	CV Venus Inti Perkasa	INDONESIA	CID002455
Tin	Conformant	Gejiu Fengming Metallurgy Chemical Plant	CHINA	CID002848
Tin	Conformant	PT Babel Inti Perkasa	INDONESIA	CID001402
Tin	Conformant	PT Babel Surya Alam Lestari	INDONESIA	CID001406
Tin	Active	PT Bukit Timah	INDONESIA	CID001428
Tin	Active	PT Lautan Harmonis Sejahtera	INDONESIA	CID002870
Tin	Conformant	PT Menara Cipta Mulia	INDONESIA	CID002835
Tin	Conformant	PT Prima Timah Utama	INDONESIA	CID001458
Tin	Conformant	PT Rajawali Rimba Perkasa	INDONESIA	CID003381
Tin	Conformant	PT Stanindo Inti Perkasa	INDONESIA	CID001468
Tin	Active	PT Tinindo Inter Nusa	INDONESIA	CID001490
Tin	Outreach Required	VQB Mineral and Trading Group JSC	VIETNAM	CID002015
Tin	Active	Novosibirsk Processing Plant Ltd.	RUSSIAN FEDERATION	CID001305
Tin	Conformant	Soft Metais Ltda.	BRAZIL	CID001758
Tin	Active	Super Ligas	BRAZIL	CID002756
Tin	Conformant	Thai Nguyen Mining and Metallurgy Co., Ltd.	VIETNAM	CID002834
Tin	Conformant	Thaisarco	THAILAND	CID001898
Tin	Conformant	Tin Technology & Refining	UNITED STATES OF AMERICA	CID003325
Tin	Outreach Required	Tuyen Quang Non-Ferrous Metals Joint Stock Company	VIETNAM	CID002574
Tin	Conformant	White Solder Metalurgia e Mineracao Ltda.	BRAZIL	CID002036
Tin	Conformant	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA	CID002158
Tin	Conformant	Yunnan Tin Company Limited	CHINA	CID002180
Tin	Conformant	Yunnan Yunfan Non-ferrous Metals Co., Ltd.	CHINA	CID003397
Tungsten	Conformant	A.L.M.T. Corp.	JAPAN	CID000004
Tungsten	Conformant	ACL Metais Eireli	BRAZIL	CID002833
Tungsten	Active	Albasteel Industria e Comercio de Ligas Para Fundicao Ltd.	BRAZIL	CID003427
Tungsten	Conformant	Asia Tungsten Products Vietnam Ltd.	VIETNAM	CID002502
Tungsten	Conformant	Chenzhou Diamond Tungsten Products Co., Ltd.	CHINA	CID002513
Tungsten	Active	China Molybdenum Co., Ltd.	CHINA	CID002641
Tungsten	Conformant	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA	CID000258
Tungsten	Outreach Required	CNMC (Guangxi) PGMA Co., Ltd.	CHINA	CID000281
Tungsten	Active	Cronimet Brasil Ltda	BRAZIL	CID003468
Tungsten	Conformant	Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.	CHINA	CID002830

Metal	Comments	Smelter Name	Smelter Country	Smelter Identification
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From the data we were able to obtain from our suppliers, the countries of origin of the Conflict Minerals processed in facilities in our supply chain are believed to include:

ANDORRA, AUSTRALIA, AUSTRIA, BELGIUM, BOLIVIA, BRAZIL, CANADA, CHILE, CHINA, COLOMBIA, CZECHIA, ESTONIA, FRANCE, GERMANY, GHANA, INDIA, INDONESIA, ITALY, JAPAN, KAZAKHSTAN, REPUBLIC OF KOREA, KYRGYZSTAN, LITHUANIA, MALAYSIA, MAURITANIA, MEXICO, MYANMAR, NETHERLANDS, NEW ZEALAND, NORTH MACEDONIA, NORWAY, PERU, PHILIPPINES, POLAND, RUSSIAN FEDERATION, RWANDA, SAUDI ARABIA, SINGAPORE, SOUTH AFRICA, SPAIN, SUDAN, SWEDEN, SWITZERLAND, TAIWAN, THAILAND, TURKEY, UGANDA, UNITED ARAB EMIRATES, UNITED STATES OF AMERICA, UZBEKISTAN, VIET NAM, AND ZIMBABWE.