# UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, DC 20549

# FORM SD SPECIALIZED DISCLOSURE REPORT

#### SILICON LABORATORIES INC.

(Exact name of registrant as specified in its charter)

**Delaware** (State or other jurisdiction of incorporation)

**000-29823** (Commission File Number)

**74-2793174** (IRS Employer Identification No.)

**400 West Cesar Chavez, Austin, TX 78701** (Address of principal executive offices) (Zip Code)

John C. Hollister

(512) 416-8500

(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:		
þ	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**

#### **Conflict Minerals Disclosure**

#### Introduction

This Specialized Disclosure Report on Form SD ("Form SD") of Silicon Laboratories Inc. ("Silicon Laboratories" or "the Company") 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. Conflict minerals are defined by the SEC as cassiterite, columbite-tantalite, gold and wolframite, as well as their derivatives (including tantalum, tin and tungsten) and any other mineral or its derivatives determined by the United States Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country (collectively, "Covered Countries").

The Rule imposes certain reporting obligations on SEC registrants that file reports under Section 13(a) or Section 15(d) of the Exchange Act whose products contain conflict minerals that are necessary to the functionality or production of their products. For products which contain necessary conflict minerals, the registrant must conduct in good faith a reasonable country of origin inquiry ("RCOI") designed to determine whether any of the conflict minerals originated in the Covered Countries.

# **Reasonable Country of Origin Inquiry**

## Description of Reasonable Country of Origin Inquiry Efforts

The following is a brief description of the RCOI process the Company undertook in accordance with the Rule:

- The Company reviewed the components of the products provided by its suppliers to determine if such products contained conflict minerals.
- The Company conducted a supply chain survey with suppliers to obtain country of origin information for the necessary conflict minerals in the Company's products using the Responsible Minerals Initiative ("RMI") Conflict Minerals Reporting Template ("CMRT").
- · The Company reviewed the completed CMRT surveys for compliance with the Company's internal policy.
- The Company compared the smelters and refiners identified by the CMRT surveys against the list of facilities that have received a "conflict free" designation from the Responsible Minerals Assurance Process ("RMAP").
- The Company assessed whether the smelters and refiners had carried out all elements of reasonable due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas.

# Results of the Reasonable Country of Origin Inquiry and Determination of Products

Based on the results of the Company's RCOI, the following was determined:

- A portion of the necessary conflict minerals contained in the Company's products originated or may have originated in the Covered Countries and those necessary conflict minerals may not be solely from recycled or scrap sources. The Company performed due diligence measures on these conflict minerals, as discussed further below.
- · A portion of the necessary conflict minerals contained in the Company's products are from recycled or scrap sources. Conflict minerals obtained from recycled or scrap sources are considered DRC conflict free pursuant to Rule 13p-1.

# **Conflict Minerals Report**

On May 23, 2022, Silicon Laboratories issued its Conflict Minerals Report for the calendar year ended December 31, 2021. Such report is filed herewith as Exhibit 1.01 and is also available in the Investor Relations section of Silicon Laboratories' website under "Corporate Governance" at www.silabs.com. Silicon Laboratories' website and the information contained therein or connected thereto are not intended to be incorporated into this Report on Form SD.

#### Item 1.02 Exhibit

The Conflict Minerals Report for the calendar year ended December 31, 2021 is filed as Exhibit 1.01.

#### **Section 2 - Resource Extraction Issuer Disclosure**

# Item 2.01 Resource Extraction Issuer Disclosure and Report

Not applicable.

Section 3 - Exhibits

**Item 3.01 Exhibits** 

Exhibit No. Description

1.01 Conflict Minerals Report as required by Items 1.01 and 1.02 of this Form.

# **SIGNATURES**

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

SILICON LABORATORIES INC.	
May 25, 2022	/s/ John C. Hollister
Date	John C. Hollister Senior Vice President and Chief Financial Officer

### Silicon Laboratories Inc. Conflict Minerals Report Calendar Year Ended December 31, 2021

This Conflict Minerals Report of Silicon Laboratories Inc. ("Silicon Laboratories" or "the Company") 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 ("Dodd-Frank Act"). Conflict minerals are defined by the SEC as cassiterite, columbite-tantalite, gold and wolframite, as well as their derivatives (including tantalum, tin and tungsten) and any other mineral or its derivatives determined by the United States Secretary of State to be financing conflict in the Democratic Republic of the Congo ("DRC") or an adjoining country (collectively, "Covered Countries").

The Rule imposes certain reporting obligations on SEC registrants that file reports under Section 13(a) or Section 15(d) of the Exchange Act whose products contain conflict minerals that are necessary to the functionality or production of their products. For products which contain necessary conflict minerals, the registrant must conduct in good faith a reasonable country of origin inquiry ("RCOI") designed to determine whether any of the conflict minerals originated in the Covered Countries. If, based on such inquiry, the registrant knows or has reason to believe that any of the necessary conflict minerals contained in its products originated or may have originated in a Covered Country and knows or has reason to believe that those necessary conflict minerals may not be solely from recycled or scrap sources, the registrant must conduct due diligence as to whether the necessary conflict minerals contained in those products did or did not directly or indirectly finance or benefit armed groups in the Covered Countries. Products which do not contain necessary conflict minerals that directly or indirectly finance or benefit armed groups in the Covered Countries are considered "DRC conflict free."

Certain of the Company's products contain conflict minerals, including gold, tantalum, tin and/or tungsten. These minerals are necessary to the functionality of the products contracted by the Company to be manufactured. Pursuant to the Rule, the Company undertook due diligence measures on the source and chain of custody of the conflict minerals in its products that the Company had reason to believe may have originated from the Covered Countries and may not have come from recycled or scrap sources, to determine whether such products were DRC conflict free.

The following describes: (a) the design of the Company's Conflict Minerals Program; (b) the Company's conclusion based on its RCOI; (c) the measures the Company has taken to exercise due diligence on the source and chain of custody of the conflict minerals contained in its products; and (d) the Company's products, including information on the facilities used to process the necessary conflict minerals in those products, the country of origin of the necessary conflict minerals in those products and the Company's efforts to determine the mine or location of origin of those conflict minerals with the greatest possible specificity.

#### Part 1 – Due Diligence

#### **Design of Conflict Minerals Program**

The design of the Company's conflict minerals program is in conformity with the Organisation for Economic Co-operation and Development ("OECD") Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Second Edition, and related Supplements on Tin, Tantalum and Tungsten and on Gold (collectively, "OECD Guidance"), as it relates to the Company's position in the minerals supply chain. Summarized below are the design components of the Company's conflict minerals program as they relate to the five-step framework set forth in the OECD Guidance:

#### 1. Establish strong company management systems.

- · Adopt and commit to a supply chain policy for minerals originating from conflict-affected and high-risk areas.
  - The Company's supply chain policy requires all suppliers to maintain a conflict-free sourcing policy and to comply with the Company's internal policy based on the OECD Guidance.
- Structure internal management systems to support supply chain due diligence.
  - Vendors that supply the Company with products containing conflict minerals are required to complete a Responsible Minerals Initiative ("RMI") Conflict Minerals Reporting Template ("CMRT"), a supply chain survey designed to identify the smelters, refiners and countries of origin of the conflict minerals in products the vendors supply to a customer.
- Establish a system of controls and transparency over the mineral supply chain.
  - The Company maintains a dedicated internal system to track, analyze and approve supplier responses to supply chain surveys. The Company maintains records relating to its conflict minerals program in accordance with its record retention guidelines.
- · Strengthen Company engagement with suppliers.
  - The Company has created an internal system of controls to ensure that both current and new suppliers report information regarding their supply chain.
- · Establish a Company level grievance mechanism.
  - The Company maintains an external reporting system for individuals to report concerns of actions (including compliance with the Company's conflict minerals program) that may not comply with the Company's standards, contractual, regulatory or legal requirements.

# 2. Identify and assess risks in the Company's supply chain.

- · Identify risks in the supply chain as recommended in the OECD Guidance Supplements.
  - The Company reviews the components of the products provided by its suppliers to determine if such products may contain conflict minerals.
  - The Company requests suppliers that provide products which may contain conflict minerals to complete the CMRT survey. The
    Company contacts vendors that do not respond to the supply chain survey by a specified date, requesting their responses. If
    necessary, the Company escalates its requests to management or other appropriate personnel as described in its supply chain
    policy.
- Assess risks of adverse impacts in light of the standards of the Company's supply chain policy consistent with the due diligence recommendations in the OECD Guidance.
  - The Company reviews completed CMRT surveys for compliance with the Company's internal policy based on the OECD Guidance.
  - The Company compares the smelters and refiners identified by the CMRT surveys against the list of facilities that have received a "conflict free" designation from the RMI's Responsible Minerals Assurance Process ("RMAP").
  - The Company assesses whether the smelters and refiners have carried out all elements of reasonable due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas.

# 3. Design and implement a strategy to respond to identified risks.

- · Devise and adopt a risk management plan.
  - The Company has adopted a risk management plan, which includes measures for risk mitigation for suppliers using smelters and refiners that have not received a conflict free designation from the RMAP.
- Implement the risk management plan, monitor and track performance of risk mitigation efforts and report back to designated senior management.
  - The Company's risk mitigation efforts for smelters and refiners that have not received a conflict free designation from the RMAP include: (a) reviewing the mine location; (b) requesting and reviewing Certificate of Origin documents from the supplier; (c) requesting an action plan from the supplier; and (d) performing a risk assessment with an internal management team for further consideration of risk mitigation.

- · Undertake additional fact and risk assessments for risks requiring mitigation, or after a change of circumstances.
  - The Company's conflict minerals policy is an on-going program for both current and new suppliers. Any change in the Company's supply chain may require that certain steps be repeated in order to prevent or mitigate adverse impacts.
- · Report findings of the supply chain risk assessment to the designated senior management of the Company.
  - The Company reports findings from its supply chain risk assessment to its Executive Quality Council, which consists of members of the Company's executive management.
- If and when required by the Rule, obtain an independent private sector audit of the Company's Conflict Minerals Report.

#### 4. Carry out independent third-party audit of supply chain due diligence at identified points in the supply chain.

- The Company supports development and implementation of due diligence practices and tools, including:
  - o The CMRT survey completed by the Company's suppliers,
  - o The Conflict Free Smelter Program used by the Company to determine facilities that have received a conflict free designation.
- The Company encourages all of its conflict mineral suppliers to use facilities that have received a conflict free designation.

#### 5. Report on supply chain due diligence.

 The Company publicly reports on its supply chain due diligence policies and practices in the Investor Relations section of its website at www.silabs.com.

#### **Conclusion Based on Reasonable Country of Origin Inquiry**

Step 2 of the Company's Conflict Minerals Program, *Identify and assess risks in the Company's supply chain*, represents its RCOI. This step is designed to determine whether any of the conflict minerals in the Company's products originated in the Covered Countries. Based on the results of the Company's RCOI, the following was determined:

- · A portion of the necessary conflict minerals contained in the Company's products originated or may have originated in the Covered Countries and those necessary conflict minerals may not be solely from recycled or scrap sources. The Company performed due diligence measures on these conflict minerals.
- · A portion of the necessary conflict minerals contained in the Company's products are from recycled or scrap sources. Conflict minerals obtained from recycled or scrap sources are considered DRC conflict free pursuant to Rule 13p-1.

#### **Description of Due Diligence Measures Performed**

Steps 3 and 4 of the Company's Conflict Minerals Program, *Design and implement a strategy to respond to identified risks* and *Carry out independent third-party audit of supply chain due diligence at identified points in the supply chain*, respectively, represent the due diligence measures performed by the Company. The purpose of these measures is to determine whether the necessary conflict minerals contained in the Company's products did or did not directly or indirectly finance or benefit armed groups in the Covered Countries in order to conclude whether such products were DRC conflict free.

Below is a description of the measures the Company performed to exercise due diligence on the source and chain of custody of the necessary conflict minerals contained in its products:

- · Adopted a risk management plan, which included measures for risk mitigation for suppliers using smelters and refiners that have not received a conflict free designation from the RMAP.
- · Requested the Company's existing and new conflict mineral suppliers to use facilities that have received a conflict free designation. Suppliers that use facilities without such designation may be removed as an approved vendor.
- · Monitored and tracked suppliers to ensure compliance with the Company's Conflict Minerals Sourcing Policy.
- Performed risk mitigation efforts with suppliers identified to be in conformity with our Conflict Minerals Sourcing Policy by working with them to bring them into compliance.
- · Reported findings from the Company's supply chain risk assessment to its Executive Quality Council.

# **Results of Due Diligence Measures and Product Determination**

The Company received responses from all of its direct suppliers subject to the supply chain survey for 2021. Collectively, their responses listed 261 smelters and refiners within their supply chains. The tables below list the smelters and refiners of conflict minerals within our supply chain for 2021. Our efforts to determine this population are described above under the caption "Description of Due Diligence Measures Performed." The information presented is derived from information provided by our direct suppliers and the RMAP.

#### **Independent Private Sector Audit**

An independent private sector audit is not required for 2021.

#### **Future Due Diligence Measures**

For the next reporting period, the Company is continuing to engage in the activities described above in "Design of Conflict Minerals Program" to mitigate the risk that its necessary conflict minerals benefit armed groups. The Company will continue to contact suppliers that use smelters and refiners identified in its supply chain survey process that have not received a conflict free designation and request their participation in the RMAP or other independent third party audit program in order for them to obtain such a conflict free designation. Additionally, the Company has requested its suppliers to remove sanctioned smelters and refiners from their supply chain to ensure compliance with U.S. sanctions and the OECD Due Diligence Framework.

#### Part 2 - Product Description

#### **Description of the Company's products**

Silicon Laboratories is a leader in secure, intelligent wireless technology for a more connected world. Our integrated hardware and software platform, intuitive development tools, industry leading ecosystem and robust support enable customers in building advanced industrial, commercial, home and life applications. Our semiconductor devices leverage standard complementary metal oxide semiconductor (CMOS), a low cost, widely available process technology.

As a fabless semiconductor company, we rely on third-party semiconductor fabricators to manufacture the silicon wafers that reflect our IC designs. Each wafer contains numerous die, which are cut from the wafer to create a chip for an IC. We rely on third parties to assemble, package, and, in most cases, test these devices and ship these units to our customers.

# The following facilities, to the extent known, are used to process the necessary conflict minerals in the Company's products:

Metal	Facility Name
Gold	8853 S.p.A.
Gold	Advanced Chemical Company
Gold	Aida Chemical Industries Co., Ltd.
Gold	Al Etihad Gold Refinery DMCC
Gold	Allgemeine Gold-und Silberscheideanstalt A.G.
Gold	Almalyk Mining and Metallurgical Complex (AMMC)
Gold	AngloGold Ashanti Corrego do Sitio Mineracao
Gold	Argor-Heraeus S.A.
Gold	Asahi Pretec Corp.
Gold	Asahi Pretec Corp.
Gold	Asahi Refining USA Inc.
Gold	Asaka Riken Co., Ltd.
Gold	AU Traders and Refiners
Gold	Aurubis AG
Gold	Bangalore Refinery
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)
Gold	Boliden AB
Gold	C. Hafner GmbH + Co. KG
Gold	C.I Metales Procesados Industriales SAS
Gold	CCR Refinery - Glencore Canada Corporation
Gold	Cendres + Metaux S.A.
Gold	Chimet S.p.A.
Gold	Chugai Mining
Gold	DODUCO Contacts and Refining GmbH
Gold	Dowa
Gold	DSC (Do Sung Corporation)
Gold	Eco-System Recycling Co., Ltd. East Plant
Gold	Eco-System Recycling Co., Ltd. North Plant
Gold	Eco-System Recycling Co., Ltd. West Plant
Gold	Emirates Gold DMCC
Gold	GCC Gujrat Gold Centre Pvt. Ltd.
Gold	Geib Refining Corporation
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.
Gold	Heimerle + Meule GmbH
Gold	Heraeus Germany GmbH Co. KG
Gold	Heraeus Metals Hong Kong Ltd.
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.
Gold	Ishifuku Metal Industry Co., Ltd.
Gold	Istanbul Gold Refinery
Gold	Italpreziosi
Gold	Japan Mint
Gold	Jiangxi Copper Co., Ltd.
Gold	JSC Novosibirsk Refinery
Gold	JSC Uralelectromed
Gold	JX Nippon Mining & Metals Co., Ltd.
Gold	Kazzinc
Gold	Kennecott Utah Copper LLC
Gold	KGHM Polska Miedz Spolka Akcyjna
Gold	Kojima Chemicals Co., Ltd.
Gold	Korea Zinc Co., Ltd.
Gold	L'Orfebre S.A.
Gold	LS-NIKKO Copper Inc.
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Gold LT Metal Ltd. Gold Marsam Metals Gold Materion

Gold Matsuda Sangyo Co., Ltd. Metal Concentrators SA (Ptv) Ltd. Gold Gold Metalor Technologies (Hong Kong) Ltd. Metalor Technologies (Singapore) Pte., Ltd. Gold Metalor Technologies (Suzhou) Ltd. Gold

Metalor Technologies S.A. Gold

Gold Metalor USA Refining Corporation Metalurgica Met-Mex Penoles S.A. De C.V. Gold

Mitsubishi Materials Corporation Gold Gold Mitsui Mining and Smelting Co., Ltd. Gold MMTC-PAMP India Pvt., Ltd. Moscow Special Alloys Processing Plant Gold Nadir Metal Rafineri San. Ve Tic. A.S. Gold Gold Navoi Mining and Metallurgical Combinat

Gold NH Recytech Company Gold Nihon Material Co., Ltd.

Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH Gold

Gold Ohura Precious Metal Industry Co., Ltd.

OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) Gold

Gold PAMP S.A.

Gold Planta Recuperadora de Metales SpA Prioksky Plant of Non-Ferrous Metals Gold PT Aneka Tambang (Persero) Tbk Gold

Gold PX Precinox S.A. Gold Rand Refinery (Pty) Ltd. REMONDIS PMR B.V. Gold Royal Canadian Mint Gold

Gold SAAMP Gold Safimet S.p.A Gold SAFINA A.S.

Samduck Precious Metals Gold SAXONIA Edelmetalle GmbH Gold SEMPSA Joyeria Plateria S.A. Gold Gold Shandong Gold Smelting Co., Ltd.

Gold Shandong Zhaojin Gold & Silver Refinery Co., Ltd.

Gold Sichuan Tianze Precious Metals Co., Ltd.

Gold Singway Technology Co., Ltd.

Gold SOE Shyolkovsky Factory of Secondary Precious Metals

Solar Applied Materials Technology Corp. Gold Sumitomo Metal Mining Co., Ltd. Gold

Gold SungEel HiMetal Co., Ltd.

Gold T.C.A S.p.A

Gold Tanaka Kikinzoku Kogyo K.K. Gold Tokuriki Honten Co., Ltd. TOO Tau-Ken-Altyn Gold

Torecom Gold

Umicore Precious Metals Thailand Gold

Gold Umicore S.A. Business Unit Precious Metals Refining

United Precious Metal Refining, Inc. Gold

Gold Valcambi S.A.

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

WIELAND Edelmetalle GmbH Gold

Gold Yamakin Co., Ltd. Gold Yokohama Metal Co., Ltd.

Gold Zhongyuan Gold Smelter of Zhongjin Gold Corporation

Tantalum AMG Brasil

Asaka Riken Co., Ltd. Tantalum

Tantalum Changsha South Tantalum Niobium Co., Ltd.

**Tantalum** D Block Metals, LLC

Tantalum Exotech Inc.

Tantalum F&X Electro-Materials Ltd. Tantalum FIR Metals & Resource Ltd. Tantalum Global Advanced Metals Aizu Tantalum Global Advanced Metals Bovertown

Tantalum Guangdong Rising Rare Metals-EO Materials Ltd. Tantalum Guangdong Zhiyuan New Material Co., Ltd.

H.C. Starck Co., Ltd. Tantalum

H.C. Starck Hermsdorf GmbH Tantalum

Tantalum H.C. Starck Inc. Tantalum H.C. Starck Ltd.

Tantalum H.C. Starck Tantalum and Niobium GmbH

Tantalum Hengyang King Xing Lifeng New Materials Co., Ltd. Tantalum Jiangxi Dinghai Tantalum & Niobium Co., Ltd.

Tantalum Jiangxi Tuohong New Raw Material

JiuJiang JinXin Nonferrous Metals Co., Ltd. Tantalum

Jiujiang Tanbre Co., Ltd. Tantalum

Jiujiang Zhongao Tantalum & Niobium Co., Ltd. Tantalum

KEMET de Mexico **Tantalum** Tantalum Meta Materials

Tantalum Metallurgical Products India Pvt., Ltd.

**Tantalum** Mineracao Taboca S.A.

Tantalum Mitsui Mining and Smelting Co., Ltd. Tantalum Ningxia Orient Tantalum Industry Co., Ltd.

Tantalum NPM Silmet AS Tantalum QuantumClean

Tantalum Resind Industria e Comercio Ltda. Solikamsk Magnesium Works OAO Tantalum

Tantalum Taki Chemical Co., Ltd. Tantalum TANIOBIS Co., Ltd. Tantalum TANIOBIS GmbH

Tantalum TANIOBIS Japan Co., Ltd.

Tantalum TANIOBIS Smelting GmbH & Co. KG

Tantalum Telex Metals

Tantalum Ulba Metallurgical Plant JSC

**Tantalum** XIMEI RESOURCES (GUANGDONG) LIMITED Tantalum XinXing HaoRong Electronic Material Co., Ltd. **Tantalum** Yanling Jincheng Tantalum & Niobium Co., Ltd.

Tin Alpha

Tin Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.

Tin Chifeng Dajingzi Tin Industry Co., Ltd.

China Tin Group Co., Ltd. Tin

CV Ayi Jaya Tin

CV Venus Inti Perkasa Tin

Tin Dowa EM Vinto Tin

Tin Estanho de Rondonia S.A.

Tin Fenix Metals

Gejiu Fengming Metallurgy Chemical Plant Tin Gejiu Kai Meng Industry and Trade LLC Tin

TinGejiu Non-Ferrous Metal Processing Co., Ltd.TinGejiu Yunxin Nonferrous Electrolysis Co., Ltd.TinGejiu Zili Mining And Metallurgy Co., Ltd.TinGuangdong Hanhe Non-Ferrous Metal Co., Ltd.

TinHuiChang Hill Tin Industry Co., Ltd.TinHuichang Jinshunda Tin Co., Ltd.TinJiangxi New Nanshan Technology Ltd.

Tin Luna Smelter, Ltd.

TinMa'anshan Weitai Tin Co., Ltd.TinMagnu's Minerais Metais e Ligas Ltda.TinMalaysia Smelting Corporation (MSC)

Tin Melt Metais e Ligas S.A.
Tin Metallic Resources, Inc.
Tin Metallo Belgium N.V.
Tin Metallo Spain S.L.U.
Tin Mineracao Taboca S.A.

Tin Minsur

Tin Mitsubishi Materials Corporation
Tin O.M. Manufacturing (Thailand) Co., Ltd.
Tin O.M. Manufacturing Philippines, Inc.
Tin Operaciones Metalurgical S.A.
Tin PT Aries Kencana Sejahtera
Tin PT Artha Cipta Langgeng
Tin PT ATD Makmur Mandiri Jaya

Tin PT Babel Inti Perkasa
Tin PT Babel Surya Alam Lestari
Tin PT Bangka Serumpun
Tin PT Bukit Timah

Tin PT Lautan Harmonis Sejahtera
Tin PT Menara Cipta Mulia
Tin PT Mitra Stania Prima
Tin PT Mitra Sukses Globalindo
Tin PT Prima Timah Utama
Tin PT Rajawali Rimba Perkasa

Tin PT Rajehan Ariq
Tin PT Rajehan Ariq
Tin PT Refined Bangka Tin
Tin PT Sariwiguna Binasentosa
Tin PT Stanindo Inti Perkasa
Tin PT Sukses Inti Makmur
Tin PT Timah (Persero) Tbk Kundur

Tin PT Timah (Persero) Tbk Kundur
Tin PT Timah (Persero) Tbk Mentok
Tin PT Timah Nusantara

Tin PT Timah Nusantara Tin PT Tinindo Inter Nusa

Tin Resind Industria e Comercio Ltda.

Tin Rui Da Hung
Tin Soft Metais Ltda.
Tin Super Ligas

Tin Thai Nguyen Mining and Metallurgy Co., Ltd.

Tin Thaisarco

Tin Tin Technology & Refining

Tin White Solder Metalurgia e Mineracao Ltda. Tin Yunnan Chengfeng Non-ferrous Metals Co., Ltd.

Tin Yunnan Tin Company Limited

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

Tungsten A.L.M.T. Corp.
Tungsten ACL Metais Eireli

Tungsten Albasteel Industria e Comercio de Ligas Para Fundicao Ltd.

Tungsten Asia Tungsten Products Vietnam Ltd.

Tungsten Chenzhou Diamond Tungsten Products Co., Ltd.

Tungsten China Molybdenum Tungsten Co., Ltd. Chongvi Zhangyuan Tungsten Co., Ltd. Tungsten

Tungsten Cronimet Brasil Ltda

Tungsten Fujian Ganmin RareMetal Co., Ltd. Tungsten Ganzhou Haichuang Tungsten Co., Ltd. Tungsten Ganzhou Huaxing Tungsten Products Co., Ltd. Tungsten Ganzhou Jiangwu Ferrotungsten Co., Ltd. Ganzhou Seadragon W & Mo Co., Ltd. Tungsten Tungsten Global Tungsten & Powders Corp. Tungsten Guangdong Xianglu Tungsten Co., Ltd.

H.C. Starck Tungsten GmbH Tungsten Hunan Chenzhou Mining Co., Ltd. Tungsten

Tungsten Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji Tungsten Hunan Chunchang Nonferrous Metals Co., Ltd.

Tungsten Hydrometallurg, JSC Tungsten Japan New Metals Co., Ltd.

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

Jiangxi Gan Bei Tungsten Co., Ltd. Tungsten

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

Tungsten Jiangxi Xinsheng Tungsten Industry Co., Ltd.

Tungsten Jiangxi Yaosheng Tungsten Co., Ltd. JSC "Kirovgrad Hard Alloys Plant" Tungsten

Tungsten Kennametal Fallon Tungsten Kennametal Huntsville Tungsten KGETS Co., Ltd. Tungsten Lianyou Metals Co., Ltd. Tungsten Malipo Haiyu Tungsten Co., Ltd. Masan High-Tech Materials Tungsten

Tungsten Moliren Ltd.

Tungsten Niagara Refining LLC

Philippine Chuangxin Industrial Co., Inc. Tungsten Tungsten TANIOBIS Smelting GmbH & Co. KG Tungsten Unecha Refractory metals plant 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.

## The countries of origin of the necessary conflict minerals in the Company's products are believed to include:

Australia, Bolivia, Brazil, Burundi, Canada, Chile, China, Democratic Republic of Congo, Ethiopia, Germany, India, Indonesia, Japan, Kazakhstan, Laos, Malaysia, Mongolia, Morocco, Mozambique, Myanmar, Namibia, Nigeria, Peru, Philippines, Portugal, Russian Federation, Rwanda, Sierra Leone, Sweden, Switzerland, Thailand, United States, Vietnam and Zimbabwe.

#### Efforts to determine the mine or location of origin with the greatest possible specificity of the necessary conflict minerals in the Company's products:

In an effort to determine the mine or location of origin of the necessary conflict minerals in its products that are DRC conflict free with the greatest possible specificity, the Company developed and conducted the due diligence measures described in Part 1 of this Conflict Minerals Report.