

# FABRINET

## **FORM SD** (Specialized Disclosure Report)

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

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**FORM SD**

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**Specialized Disclosure Report**

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**FABRINET**

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

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**Cayman Islands**  
(State of other jurisdiction of  
incorporation or organization)

**001-34775**  
(Commission  
File Number)

**Not applicable**  
(IRS Employer  
Identification No.)

**c/o Intertrust Corporate Services (Cayman) Limited**  
**190 Elgin Avenue**  
**George Town**  
**Grand Cayman**  
**KY1-9005**  
**Cayman Islands**  
(Address of principal executive offices)

**Toh-Seng Ng**  
**Chief Financial Officer**  
**66-81-948-1663**

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

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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 form applies:

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2016.

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**Section 1 - Conflict Minerals Disclosure****Item 1.01 Conflict Minerals Disclosure and Report**

A copy of the Conflict Minerals Report of Fabrinet (“Fabrinet” or the “Company”) is filed as Exhibit 1.01 hereto and is publicly available at <http://fabrinet.com/services/supply-chain>.

The full text of Fabrinet’s Conflict Minerals Sourcing Policy is publicly available at <http://fabrinet.com/services/supply-chain>.

Any websites referenced in this Form SD and the information accessible through them are not incorporated in this Form SD.

**Item 1.02 Exhibit**

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

**Section 2 - Exhibits****Item 2.01 Exhibits**

<u>Exhibit No.</u>	<u>Description</u>
1.01	Fabrinet Conflict Minerals Report for Calendar Year 2016

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**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.

**FABRINET**  
(Registrant)

By: /s/ Toh-Seng Ng  
Toh-Seng Ng  
Executive Vice President, Chief Financial Officer

May 31, 2017  
(Date)

**FABRINET  
CONFLICT MINERALS REPORT  
YEAR ENDED DECEMBER 31, 2016**

**I. Introduction**

We provide advanced optical packaging and precision optical, electro-mechanical and electronic manufacturing services to original equipment manufacturers (OEMs) of complex products, such as optical communication components, modules and sub-systems, industrial lasers and sensors. We offer a broad range of advanced optical and electro-mechanical capabilities across the entire manufacturing process, including process design and engineering, supply chain management, manufacturing, advanced packaging, integration, final assembly and test. Certain products that we manufacture for our customers contain materials or components that use tin, tantalum, tungsten and/or gold (“3TG”). Due to the depth of the supply chain, we are far removed from the sources of ore from which these metals are produced and the smelters/refiners that process those ores; the efforts undertaken to identify the country(ies) or origin of those ores reflect our circumstances and position in the supply chain. The amount of information available globally on the traceability and sourcing of these ores is limited at this time; this situation is not unique to us. We have taken steps we believe to be reasonable under the circumstances to identify the applicable smelters and refiners of such 3TG metals in our supply chain; however, we believe that the smelters and refiners of the 3TG contained in the products we manufacture for our customers are best situated to identify the sources and countries of origin of the 3TG.

We do not directly manufacture products but “contract to manufacture” branded and generic products containing 3TG on behalf of our customers. Our due diligence efforts were undertaken on the exclusive and/or privately-branded products sourced directly by, and manufactured for, us in 2016.

**II. Reasonable Country of Origin Inquiry (RCOI)**

Direct suppliers were asked to provide answers to the Electronic Industry Citizenship Coalition (EICC) / Global e-Sustainability Initiative (GeSI) Conflict Minerals Common Reporting Template reflecting Fabrinet’s position on the supply chain (the “EICC Template”). The EICC Template includes questions regarding a direct supplier’s conflict-free policy, its due diligence process, and information about its supply chain such as the names and locations of smelters and refiners and the origin of 3TG used by those facilities. The EICC Template is regarded as the most common reporting tool for conflict minerals content and sourcing information worldwide, developed by several of the world’s leading consumer electronics companies.

Utilizing a third-party service provider to assist with our RCOI, our service provider reviewed the responses received to the questionnaires for completeness and consistency of answers. Suppliers were required to provide corrections and clarifications where needed. Our service provider also performed smelter/refiner validation based on the names of smelter/refiner. Based on the RCOI, we do not have sufficient information from our direct suppliers to determine the sources of the necessary 3TG contained in the products we manufacture for our customers.

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We believe our RCOI process was reasonably designed and performed in good faith, but there are inherent limitations in the information provided to us by third parties, including the possibility of information being inaccurate, incomplete or falsified despite our efforts to validate and confirm the information.

### III. Due Diligence Program

We designed our overall conflict minerals procedures based on, and in conformity with the five-step framework of set forth in the Second Edition of the Organisation for Economic Co-operation and Development's *Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*. We implemented appropriate elements of the five-step framework as were reasonably applied to our circumstances and position in the supply chain as a "downstream" company with little to no direct influence on smelters/refiners. The five step framework consists of:

(1) Establish strong company management systems:

- We adopted and published our Conflict Minerals Sourcing Policy, a copy of which is publicly available on our website at <http://fabrinet.com/services/supply-chain>.
- We created a conflict minerals task force led by our supply chain management organization to implement our Conflict Minerals Sourcing Policy.
- We communicated our Conflict Minerals Sourcing Policy to our direct suppliers.
- We have conducted awareness sessions concerning the commitments and requirements expected of our suppliers.

(2) Identify and assess risks in the supply chain:

- We identified direct suppliers that supply product or material that may contain conflict minerals.
- We engaged a third-party service provider to perform the RCOI as follows:
  - conducted supplier surveys using the EICC Template
  - reviewed responses to the EICC Template for completeness and consistency of answers. Suppliers were required to provide corrections and clarifications where needed.
  - compared smelters and refiners identified by suppliers to the Conflict-Free Sourcing Initiative's ("CFSI") list of validated conflict free facilities for initial risk screening.

(3) Design and implement a strategy to respond to identified risks:

- We reported to senior management on direct suppliers' responses to our conflict minerals information requests, including updates on monitoring and tracking corrective action and risk mitigation efforts (where applicable).
- Using a third party service, we compared smelters and refiners identified by suppliers to the CFSI lists of validated conflict free and verified facilities and the U.S. Department of Commerce "Reporting Requirements Under Section 1502(d)(3)(C) of the Dodd-Frank Act World-Wide Conflict Mineral Processing Facilities" (<https://www.nema.org/Policy/Documents/Commerce%20Department%20Report%20on%20Minerals%20Processing%20Facilities.pdf>) and conducted our own supplemental research on smelters and refiners.
- We developed a risk mitigation plan that allows for continued trade with a supplier during the supplier's risk mitigation efforts.

(4) Carry out independent third-party audit of supply chain due diligence at identified points in the supply chain:

- We do not perform or direct audits of 3TG smelters or refiners. We rely on audits conducted by third parties through our membership in the EICC supplier self-disclosures of certification status, and our policy and procurement practices that encourage suppliers to purchase materials from audited smelters and refiners.

(5) Report on supply chain due diligence:

- We communicated our Conflict Minerals Report on our company website at <http://fabrinet.com/services/supply-chain>.

#### IV. Product Determination

We received inconclusive data from our direct suppliers, and our material source information is still developing. Therefore, we are unable to make a definitive determination about the sources of 3TG in the products we manufacture for our customers. At the same time, we received no information from our direct suppliers indicating that the 3TG in our Covered Products (as defined below) directly or indirectly financed or benefitted armed groups in the Democratic Republic of the Congo and the adjoining countries of Angola, Burundi, the Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia. Some suppliers disclosed to us that scrap/recycled sources of 3TG were identified in their supply chains and did not require due diligence.

#### V. Product Description

Our customer base includes companies in complex industries that require advanced precision manufacturing capabilities, such as optical communications, industrial lasers and sensors. The products that we manufacture for our OEM customers include: selective switching products; tunable transponders and transceivers; active optical cables; solid state, diode-pumped, gas and fiber lasers; and sensors (collectively, the “Covered Products”).

We identified the following smelters and refiners that have achieved Conflict Free designation by the CFSI or an audit program with which CFSI has mutual recognition, are actively in the process of obtaining the designations, or for which we independently obtained country of origin information. We were unable to definitively link the identified smelters and refiners to only those products and materials in our supply chain; therefore, the following list likely contains more processing facilities than are actually in our supply chain or Covered Products.

<u>Metal</u>	<u>Verified Refiners</u>
Gold	Bangalore Refinery
Gold	Modeltech Sdn Bhd
Gold	Universal Precious Metals Refining Zambia
Gold	Sai Refinery
Gold	Gujarat Gold Centre
Gold	AURA-II

<b>Metal</b>	<b>Verified Refiners</b>
Gold	AU Traders and Refiners
Gold	Ögussa Österreichische Gold- und Silber-Scheideanstalt GmbH
Gold	WIELAND Edelmetalle GmbH
Gold	SAXONIA Edelmetalle GmbH
Gold	SAAMP
Gold	Abington Reldan Metals, LLC
Gold	TOO Tau-Ken-Altyn
Gold	Korea Zinc Co., Ltd.
Gold	Remondis Argentia B.V.
Gold	T.C.A S.p.A
Gold	Emirates Gold DMCC
Gold	Al Etihad Gold Refinery DMCC
Gold	Singway Technology Co., Ltd.
Gold	KGHM Polska Miedź Spółka Akcyjna
Gold	Republic Metals Corporation
Gold	MMTC-PAMP India Pvt., Ltd.
Gold	Geib Refining Corporation
Gold	Umicore Precious Metals Thailand
Gold	Guangdong Jinding Gold Limited
Gold	Safina a.s.
Gold	Morris and Watson
Gold	Zijin Mining Group Co., Ltd. Gold Refinery
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation
Gold	Yokohama Metal Co., Ltd.
Gold	YAMAMOTO PRECIOUS METAL CO., LTD.
Gold	Western Australian Mint trading as The Perth Mint
Gold	Valcambi S.A.
Gold	United Precious Metal Refining, Inc.
Gold	Umicore S.A. Business Unit Precious Metals Refining
Gold	Umicore Brasil Ltda.
Gold	Torecom
Gold	Tongling Nonferrous Metals Group Co., Ltd.
Gold	Tokuriki Honten Co., Ltd.
Gold	The Refinery of Shandong Gold Mining Co., Ltd.
Gold	Great Wall Precious Metals Co., Ltd. of CBPM
Gold	Tanaka Kikinzoku Kogyo K.K.
Gold	Sumitomo Metal Mining Co., Ltd.
Gold	Solar Applied Materials Technology Corp.
Gold	SOE Shyolkovsky Factory of Secondary Precious Metals
Gold	So Accurate Group, Inc.
Gold	Sichuan Tianze Precious Metals Co., Ltd.
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.
Gold	Shandong Tiancheng Biological Gold Industrial Co., Ltd.
Gold	SEMPSA Joyeria Plateria S.A.
Gold	Schone Edelmetaal B.V.
Gold	SAMWON METALS Corp.
Gold	Samduck Precious Metals
Gold	Sabin Metal Corp.



<b>Metal</b>	<b>Verified Refiners</b>
Gold	Royal Canadian Mint
Gold	Rand Refinery (Pty) Ltd.
Gold	PX Précinox S.A.
Gold	PT Aneka Tambang (Persero) Tbk
Gold	Prioksky Plant of Non-Ferrous Metals
Gold	Penglai Penggang Gold Industry Co., Ltd.
Gold	PAMP S.A.
Gold	OJSC “The Gulidov Krasnoyarsk Non-Ferrous Metals Plant” (OJSC Krastsvetmet)
Gold	Ohura Precious Metal Industry Co., Ltd.
Gold	Elemetal Refining, LLC
Gold	Nihon Material Co., Ltd.
Gold	Navoi Mining and Metallurgical Combinat
Gold	Nadir Metal Rafineri San. Ve Tic. A.Ş.
Gold	Moscow Special Alloys Processing Plant
Gold	Mitsui Mining and Smelting Co., Ltd.
Gold	Mitsubishi Materials Corporation
Gold	Metalúrgica Met-Mex Peñoles S.A. De C.V.
Gold	Metalor USA Refining Corporation
Gold	Metalor Technologies S.A.
Gold	Metalor Technologies (Singapore) Pte., Ltd.
Gold	Metalor Technologies (Hong Kong) Ltd.
Gold	Metalor Technologies (Suzhou) Ltd.
Gold	Matsuda Sangyo Co., Ltd.
Gold	Materion
Gold	Luoyang Zijin Yinhuai Gold Refinery Co., Ltd.
Gold	LS-NIKKO Copper Inc.
Gold	Lingbao Jinyuan Tonghui Refinery Co., Ltd.
Gold	Lingbao Gold Co., Ltd.
Gold	L’azurde Company For Jewelry
Gold	Kyrgyzaltyn JSC
Gold	Kojima Chemicals Co., Ltd.
Gold	Kennecott Utah Copper LLC
Gold	Kazzinc
Gold	Kazakhmys Smelting LLC
Gold	JX Nippon Mining & Metals Co., Ltd.
Gold	JSC Uralelectromed
Gold	JSC Ekaterinburg Non-Ferrous Metal Processing Plant
Gold	Asahi Refining Canada Ltd.
Gold	Asahi Refining USA Inc.
Gold	Jiangxi Copper Co., Ltd.
Gold	Japan Mint
Gold	Istanbul Gold Refinery
Gold	Ishifuku Metal Industry Co., Ltd.
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.
Gold	HwaSeong CJ Co., Ltd.
Gold	Hunan Chenzhou Mining Co., Ltd.
Gold	Heraeus Precious Metals GmbH & Co. KG
Gold	Heraeus Ltd. Hong Kong

<b>Metal</b>	<b>Verified Refiners</b>
Gold	Heimerle + Meule GmbH
Gold	Hangzhou Fuchunjiang Smelting Co., Ltd.
Gold	Guoda Safina High-Tech Environmental Refinery Co., Ltd.
Gold	Gansu Seemine Material Hi-Tech Co., Ltd.
Gold	OJSC Novosibirsk Refinery
Gold	Eco-System Recycling Co., Ltd.
Gold	Dowa
Gold	DODUCO GmbH
Gold	DSC (Do Sung Corporation)
Gold	Daye Non-Ferrous Metals Mining Ltd.
Gold	Daejin Indus Co., Ltd.
Gold	Chugai Mining
Gold	Chimet S.p.A.
Gold	Yunnan Copper Industry Co., Ltd.
Gold	Cendres + Métaux S.A.
Gold	CCR Refinery—Glencore Canada Corporation
Gold	Caridad
Gold	C. Hafner GmbH + Co. KG
Gold	Boliden AB
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)
Gold	Aurubis AG
Gold	Atasay Kuyumculuk Sanayi Ve Ticaret A.S.
Gold	Asaka Riken Co., Ltd.
Gold	Asahi Pretec Corp.
Gold	Argor-Heraeus S.A.
Gold	AngloGold Ashanti Córrego do Sítio Mineração
Gold	Almalyk Mining and Metallurgical Complex (AMMC)
Gold	Allgemeine Gold-und Silberscheideanstalt A.G.
Gold	Aida Chemical Industries Co., Ltd.
Gold	Advanced Chemical Company
Gold	Baiyin Nonferrous Group Co.,Ltd
Gold	Bauer Walser AG
Gold	China Nonferrous Metal Mining (Group) Co., Ltd. (CNMC)
Gold	Heesung Group
Gold	Henan Yuguang Gold & Lead Co., Ltd.
Gold	Philippine Associated Smelting and Refining Corporation
Gold	Sen Silver
Gold	Shandong Humon Smelting Co., Ltd.
Gold	Shandong Yanggu Xiangguang Co. Ltd.
Gold	Shenzhen Zhonghenglong Real Industry Co.,Ltd.
Gold	Sino-platinum Metals CO.,Ltd
Gold	Super Dragon Technology Co., Ltd.
Gold	Tanaka Kikinzoku Kogyo K.K.
Tantalum	Power Resources Ltd.
Tantalum	Jiangxi Tuohong New Raw Material
Tantalum	Resind Indústria e Comércio Ltda.
Tantalum	E.S.R. Electronics
Tantalum	Tranzact, Inc.

<b>Metal</b>	<b>Verified Refiners</b>
Tantalum	KEMET Blue Powder
Tantalum	Global Advanced Metals Aizu
Tantalum	Global Advanced Metals Boyertown
Tantalum	Plansee SE Reutte
Tantalum	H.C. Starck Smelting GmbH & Co. KG
Tantalum	H.C. Starck Ltd.
Tantalum	H.C. Starck Inc.
Tantalum	H.C. Starck Hermsdorf GmbH
Tantalum	H.C. Starck GmbH Laufenburg
Tantalum	H.C. Starck GmbH Goslar
Tantalum	H.C. Starck Co., Ltd.
Tantalum	Plansee SE Liezen
Tantalum	KEMET Blue Metals
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.
Tantalum	FIR Metals & Resource Ltd.
Tantalum	D Block Metals, LLC
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.
Tantalum	Yichun Jin Yang Rare Metal Co., Ltd.
Tantalum	Zhuzhou Cemented Carbide Group Co., Ltd.
Tantalum	Ulba Metallurgical Plant JSC
Tantalum	Telex Metals
Tantalum	Taki Chemical Co., Ltd.
Tantalum	Solikamsk Magnesium Works OAO
Tantalum	RFH Tantalum Smeltry Co., Ltd.
Tantalum	QuantumClean
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.
Tantalum	Molycorp Silmet A.S.
Tantalum	Mitsui Mining and Smelting Co., Ltd.
Tantalum	Mineração Taboca S.A.
Tantalum	Metallurgical Products India Pvt., Ltd.
Tantalum	LSM Brasil S.A.
Tantalum	King-Tan Tantalum Industry Ltd.
Tantalum	Jiujiang Tanbre Co., Ltd.
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.
Tantalum	Hi-Temp Specialty Metals, Inc.
Tantalum	Guangdong Zhiyuan New Material Co., Ltd.
Tantalum	F&X Electro-Materials Ltd.
Tantalum	Exotech Inc.
Tantalum	Duoluoshan
Tantalum	Conghua Tantalum and Niobium Smeltry
Tantalum	Changsha South Tantalum Niobium Co., Ltd.
Tantalum	Global Tungsten & Powders Corp.
Tin	PT Lautan Harmonis Sejahtera
Tin	Gejiu Jinye Mineral Company
Tin	Modeltech Sdn Bhd
Tin	Guanyang Guida Nonferrous Metal Smelting Plant

<b>Metal</b>	<b>Verified Refiners</b>
Tin	Gejiu Fengming Metallurgy Chemical Plant
Tin	HuiChang Hill Tin Industry Co., Ltd.
Tin	PT Menara Cipta Mulia
Tin	PT Kijang Jaya Mandiri
Tin	An Thai Minerals Co., Ltd.
Tin	PT Sukses Inti Makmur
Tin	PT Bangka Prima Tin
Tin	Elmet S.L.U.
Tin	Metallo-Chimique N.V.
Tin	PT O.M. Indonesia
Tin	Resind Indústria e Comércio Ltda.
Tin	An Vinh Joint Stock Mineral Processing Company
Tin	PT Cipta Persada Mulia
Tin	CV Tiga Sekawan
Tin	CV Dua Sekawan
Tin	Tuyen Quang Non-Ferrous Metals Joint Stock Company
Tin	Nghe Tinh Non-Ferrous Metals Joint Stock Company
Tin	Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company
Tin	CV Ayi Jaya
Tin	PT Inti Stania Prima
Tin	O.M. Manufacturing Philippines, Inc.
Tin	Phoenix Metal Ltd.
Tin	PT ATD Makmur Mandiri Jaya
Tin	Melt Metais e Ligas S.A.
Tin	PT Wahana Perkit Jaya
Tin	PT Tirus Putra Mandiri
Tin	Magnu's Minerais Metais e Ligas Ltda.
Tin	CV Venus Inti Perkasa
Tin	Yunnan Tin Company Limited
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.
Tin	White Solder Metalurgia e Mineração Ltda.
Tin	VQB Mineral and Trading Group JSC
Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.
Tin	Thaisarco
Tin	Soft Metais Ltda.
Tin	Rui Da Hung
Tin	PT Tommy Utama
Tin	PT Tinindo Inter Nusa
Tin	PT Timah (Persero) Tbk Mentok
Tin	PT Timah (Persero) Tbk Kundur
Tin	PT Sumber Jaya Indah
Tin	PT Stanindo Inti Perkasa
Tin	PT Sariwiguna Binasentosa
Tin	PT REFINED BANGKA TIN
Tin	PT Prima Timah Utama
Tin	PT Panca Mega Persada
Tin	PT Mitra Stania Prima

<b>Metal</b>	<b>Verified Refiners</b>
Tin	PT Karimun Mining
Tin	PT Eunindo Usaha Mandiri
Tin	PT DS Jaya Abadi
Tin	PT Bukit Timah
Tin	PT Belitung Industri Sejahtera
Tin	PT Bangka Tin Industry
Tin	PT Babel Inti Perkasa
Tin	PT Artha Cipta Langgeng
Tin	Operaciones Metalurgical S.A.
Tin	O.M. Manufacturing (Thailand) Co., Ltd.
Tin	Nankang Nanshan Tin Manufactory Co., Ltd.
Tin	Mitsubishi Materials Corporation
Tin	Minsur
Tin	Mineração Taboca S.A.
Tin	Metallic Resources, Inc.
Tin	Malaysia Smelting Corporation (MSC)
Tin	China Tin Group Co., Ltd.
Tin	Gejiu Kai Meng Industry and Trade LLC
Tin	Huichang Jinshunda Tin Co., Ltd.
Tin	Gejiu Zili Mining And Metallurgy Co., Ltd.
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.
Tin	Fenix Metals
Tin	Estanho de Rondônia S.A.
Tin	EM Vinto
Tin	Dowa
Tin	CV United Smelting
Tin	CV Serumpun Sebalai
Tin	PT Aries Kencana Sejahtera
Tin	PT Justindo
Tin	CV Gita Pesona
Tin	Cooperativa Metalurgica de Rondônia Ltda.
Tin	Alpha
Tin	CNMC (Guangxi) PGMA Co., Ltd.
Tin	Jiangxi Ketai Advanced Material Co., Ltd.
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.
Tin	DingNan JiaWang HuanBao Co. LTD
Tin	Galloo N.V.
Tin	Global Advanced Metals
Tin	GuangDong Jiatian Stannum Products Co., Ltd
Tin	Guangxi Zhongshan Gold Bell Smelting Corp. Ltd
Tin	Hunan Xianghualing Tin Co. ltd
Tin	Jin yi group
Tin	JX Nippon Mining & Metals Co., Ltd.
Tin	Materials Eco-Refining CO.,LTD
Tin	Metahub Industries Sdn. Bhd.
Tin	Super Ligas
Tungsten	Moliren Ltd
Tungsten	Woltech Korea Co., Ltd.

<b>Metal</b>	<b>Verified Refiners</b>
Tungsten	ACL Metais Eireli
Tungsten	Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.
Tungsten	Philippine Chuangxin Industrial Co., Inc.
Tungsten	South-East Nonferrous Metal Company Limited of Hengyang City
Tungsten	Unecha Refractory metals plant
Tungsten	Hydrometallurg, JSC
Tungsten	Jiangxi Dayu Longxintai Tungsten Co., Ltd.
Tungsten	Niagara Refining LLC
Tungsten	Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.
Tungsten	Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC
Tungsten	H.C. Starck Smelting GmbH & Co.KG
Tungsten	H.C. Starck GmbH
Tungsten	Ganzhou Yatai Tungsten Co., Ltd.
Tungsten	Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd.
Tungsten	Dayu Jincheng Tungsten Industry Co., Ltd.
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.
Tungsten	Asia Tungsten Products Vietnam Ltd.
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.
Tungsten	Malipo Haiyu Tungsten Co., Ltd.
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.
Tungsten	Jiangxi Xincheng Tungsten Industry Co., Ltd.
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.
Tungsten	Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.
Tungsten	Xinhai Rendan Shaoguan Tungsten Co., Ltd.
Tungsten	Xiamen Tungsten Co., Ltd.
Tungsten	Wolfram Bergbau und Hütten AG
Tungsten	Vietnam Youngsun Tungsten Industry Co., Ltd.
Tungsten	Tejing (Vietnam) Tungsten Co., Ltd.
Tungsten	Kennametal Fallon
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.
Tungsten	Japan New Metals Co., Ltd.
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.
Tungsten	Hunan Chenzhou Mining Co., Ltd.
Tungsten	Global Tungsten & Powders Corp.
Tungsten	Fujian Jinxin Tungsten Co., Ltd.
Tungsten	Dayu Weiliang Tungsten Co., Ltd.
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.
Tungsten	Kennametal Huntsville
Tungsten	A.L.M.T. TUNGSTEN Corp.
Tungsten	Ganzhou Haichuang W Co., Ltd
Tungsten	Luoyang Mudu Tungsten & Molybdenum Technology Co., Ltd.

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**VI. Countries of Origin Identified**

Australia, Austria, Belgium, Bolivia, Brazil, Canada, China, Czech Republic, Estonia, France, Germany, India, Indonesia, Italy, Japan, Kazakhstan, Korea (Republic of), Kyrgyzstan, Macedonia, Malaysia, Mexico, Netherlands, New Zealand, Peru, Philippines, Poland, Russian Federation, Rwanda, Saudi Arabia, Singapore, South Africa, Spain, Sweden, Switzerland, Taiwan, Thailand, Turkey, United Arab Emirates, United States, Uzbekistan, Vietnam, Zambia. Covered Countries were identified only for CFSI audited facilities.

**VII. Steps to Improve Due Diligence**

We will continue to communicate our expectations and information requirements to our direct suppliers. We will also continue to monitor changes in circumstances that may impact the facts or our determination. Over time, we anticipate that the amount of information globally on the traceability and sourcing of these ores will increase and improve our knowledge. We will continue to make inquiries to our direct suppliers and undertake additional fact and risk assessments where potentially relevant changes in facts or circumstances are identified. New product will be reviewed for conflict minerals conformance during initial qualification. If we become aware of a supplier whose due diligence needs improvement, we intend to continue the trade relationship while that supplier improves its performance. We expect our suppliers to take similar measures with their suppliers to ensure alignment throughout the supply chain.

**VIII. Independent Private Sector Audit**

Not required for calendar year 2016.