

INTEGRATED DEVICE TECHNOLOGY INC

FORM SD (Specialized Disclosure Report)

Filed 05/26/17

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Telephone	4082848200
CIK	0000703361
Symbol	IDTI
SIC Code	3674 - Semiconductors and Related Devices
Industry	Semiconductors
Sector	Technology
Fiscal Year	03/30

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

FORM SD

SPECIALIZED DISCLOSURE REPORT

Commission File No. 0-12695

Integrated Device Technology, Inc.

(Exact Name of Registrant as Specified in Its Charter)

**Delaware
(State or Other Jurisdiction of
Incorporation or Organization)**

**94-2669985
(I.R.S. Employer
Identification No.)**

**6024 Silver Creek Valley Road, San Jose, California
(Address of Principal Executive Offices)**

**95138
(Zip Code)**

**Name and Telephone Number, Including Area Code of the Person to Contact in Connection with this Report:
Matthew Brandalise, Vice President & General Counsel, (408) 284-8200**

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 for the reporting period from January 1 to December 31, 2016

Section 1: IDT Form SD and Conflict Minerals Report for Calendar Year 2016

Item 1.01 Summary of Conflict Minerals Disclosure and Report

Introduction

This Form SD of Integrated Device Technology, Inc. (“IDT” or “we” or the “Company”) covering the calendar year reporting period ended December 31, 2016, is filed with the Securities and Exchange Commission (“SEC”) pursuant to Section 13 (p) of the Securities Exchange Act of 1934, as amended (“Exchange Act”), and Rule 13 p-1 and Form SD thereunder. Section 13 (p) was added to the Exchange Act by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, and directed the SEC to adopt rules in the form of Rule 13 p-1 and Form SD (together the “Rule”). The Rule, as now in effect, requires disclosure of certain information by companies that manufacture or contract to manufacture products for which certain minerals specified in Section 13(p) and the Rule are necessary to the functionality or production of those products. These designated “conflict minerals” are gold, tin, tantalum and tungsten (“3TG”). The term “Covered Countries” for purposes of the Rule are the Democratic Republic of the Congo (“DRC”), and the following nine adjoining countries: The Republic of the Congo, the Central African Republic, South Sudan, Rwanda, Uganda, Zambia, Burundi, Tanzania and Angola.

IDT understands the DRC and the nine Covered Countries are rich in natural resources. IDT also recognizes that some mining activities in certain regions/mines within the DRC and Covered Countries are controlled by non-government military groups and have been identified by the U.S. Government and other global and industry organizations as potentially contributing to human rights abuses and environmental damage within the region. IDT is committed to engaging in rigorous due diligence efforts designed to verify the source of tin, tantalum, tungsten, and gold (“3TG Minerals”) used in IDT’s supply chain. IDT is committed to purchasing 3TG Minerals and other materials only from environmentally and socially responsible suppliers.

IDT has determined that certain of its products contain various 3TG Minerals that are necessary to the functionality or production of such products. Accordingly, we were required under the Rule to conduct a good-faith, reasonable country of origin inquiry (“RCOI”), designed to determine whether any of the 3TG Minerals in our products either originated in the Covered Countries or came from recycled or scrap materials. The following is a brief description of the RCOI process IDT undertook in accordance with the Rule.

Reasonable Country of Origin Inquiry (“RCOI”):

To satisfy the RCOI requirement of the Rule, IDT has, in good faith, surveyed its suppliers using the Electronic Industry Citizen Coalition (“EICC”) and the Global e-Sustainability Initiative (“GeSI”) Conflict Minerals Reporting Template. This survey was developed by EICC and GeSI to help companies in the electronics and other industries determine whether any of the designated 3TG Minerals (as defined above) that are necessary to the functionality or production of their products either came from recycled or scrap sources or originated in one or more of the Covered Countries. As part of the RCOI process, we performed a scoping exercise to understand our supply chain, including the relevant supplier and sub-supplier population and the composition of the products or components we procured from such suppliers. We also adopted a framework for evaluating responses from suppliers and identifying potential red flags in suppliers’ responses requiring follow-up inquiries. We also adopted a company level policy statement on conflict minerals which has been published on our website ¹ at:

<http://www.idt.com/about/corporate-responsibility-citizenship/conflict-free-metals-policy>

Based on the process described above, we believe that we have conducted a good faith reasonable country of origin inquiry for the calendar year ended December 31, 2016. We have documented our RCOI process, including our analysis of the supplier responses and the scoping of our products to focus on those containing 3TG Minerals, and relevant suppliers for our internal recordkeeping purposes.

¹ The content of this website, and any other website referred to in this Form SD and/or the accompanying CMR is not incorporated by reference into either of these documents, or any other document filed or to be filed with the SEC by IDT.

Results of Inquiry:

Based on the RCOI responses and our analysis of such responses, as applied to the calendar year ended December 31, 2016, virtually all of our suppliers were able to ascertain the source mine and country of origin for most of the relevant 3TG Minerals sourced for our products. In only a few cases was a supplier unable to ascertain the source of 3TG Minerals. Therefore, we proceeded to perform reasonable due diligence procedures as required by Section 13 (p) and the Rule for all sources.

Due Diligence on the Source and Chain of Custody of Its Conflict Minerals:

IDT is required to exercise due diligence on the 3TG Minerals' source and chain of custody pursuant to a nationally or internationally recognized due diligence framework. Our due diligence measures have been designed to conform, in all material respects, with the framework in the Organization for Economic Cooperation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas: Second Edition, and the Supplements thereto for gold, tin, tantalum and tungsten ("OECD Due Diligence Guidance"), because the SEC has specified that this is an appropriate nationally or internationally recognized due diligence framework. We have adopted and communicated our conflict mineral policy to our suppliers and customers and have followed RCOI and due diligence procedures to gather information from our new and existing suppliers². In addition, there are also programs in place at IDT to encourage our suppliers to source from smelters and refiners subject to rigorous third-party supply chain audits, such as the Conflict-Free Smelter Program established as part of the Conflict-Free Sourcing Initiative. These and other due diligence measures IDT performed in calendar year 2016 are discussed in greater detail in the attached Conflict Minerals Report.

This Form SD and the Conflict Minerals Report, filed as Exhibit 1.02 hereto, are publicly available at:

<http://ir.idt.com/sec.cfm?DocType=&DocTypeExclude=&SortOrder=FilingDate%20Descending&Year=&PageNum=4&FormatFilter=>

The content of this and any other website referred to in this Form SD or the accompanying Conflict Minerals Report is not incorporated by reference into either of these documents, or any other document filed by the Company with the SEC.

Item 1.02 Exhibit

The Conflict Minerals Report ("CMR") required by Item 1.01 is filed as Exhibit 1.02 to this Form SD.

Section 2: Exhibits**Item 2.01 Exhibit**

As noted above, the following exhibit is filed as part of this Form SD:

Exhibit 1.01 - Conflict Minerals Report ("CMR") as required by Item 1.01 and 1.02 of this Form.

²IDT's RCOI and due diligence procedures overlap to a significant degree.

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.

INTEGRATED DEVICE TECHNOLOGY, INC.

By: /s/ Matthew Brandalise

Matthew Brandalise,
Vice President, General Counsel and Secretary

Dated: May 26, 2017

Integrated Device Technology, Inc.
Conflict Minerals Report for the Calendar Year Ended December 31, 2016

Company Overview:

Integrated Device Technology, Inc. (the “Company” or “IDT”) designs, develops, has manufactured and markets integrated circuit system solutions for the advanced communications, computing, consumer and automotive industries. Its broad range of semiconductor solutions combines analog and digital technology to develop system-level innovations that optimize customers' applications and enrich the end-user experience. IDT uses its market leadership in wireless power, timing, serial switching, sensors and interfaces, and adds analog and systems expertise to provide complete application-optimized, mixed-signal solutions for the market segments in which it competes. Headquartered in San Jose, California, IDT has design, test and sales facilities throughout the world. IDT stock is traded on the NASDAQ Global Select Stock Market® under the symbol "IDTI."

IDT uses third-party foundries that are primarily located in the APAC region to manufacture all of its products. IDT assembles and/or packages products using several different subcontractors in the APAC region. This enables the Company to negotiate lower prices, and limits the risk associated with production concentration in one country or company. The criteria used to select assembly subcontractors include, but are not limited to, sourcing from conflict mineral free sources, cost, quality, delivery, and subcontractor financial stability. IDT performs a vast majority of its test operations at its test facility located in Malaysia. A relatively small number of test operations also are performed at third-party subcontractors in the APAC region.

All IDT products incorporate at least one of the minerals regulated by section 1502: tungsten, tantalum, gold and tin (“3TG Minerals”). Tungsten is present in 100% of the products we sell, and tantalum is present in those products produced through three of our foundries from whom we purchase advanced technology. Gold and tin are used in certain packages for IDT products assembled by the APAC subcontractors with whom IDT contracts.

Our Conflict Minerals Policy:

IDT is committed to complying with the letter and the spirit of the conflict minerals disclosure requirements adopted by the Securities and Exchange Commission (“SEC”) under Section 13 (p) of the Securities and Exchange Act, as amended (the “Act”), in the form of Rule 13p-1 and Form SD (the “Rule”). IDT has considered the Rule’s requirements, guidance from the Organization for Economic Cooperation and Development (the “OECD”) that has been recognized as authoritative by the SEC, and related measures being taken by the EICC/GeSI Extractives Work Group and other organizations, and is implementing and enhancing its formal Conflict Minerals compliance program accordingly. Our Conflict Minerals Policy Statement is available on the IDT.com website at:

<http://www.idt.com/about/corporate-responsibility-citizenship/conflict-free-metals-policy>

To support this policy, IDT 1) conducts a reasonable country of origin inquiry of its suppliers and, if required by the Rule (as it was for calendar year 2016), implements a program of due diligence on the source and chain of custody of 3TG Minerals necessary to the functionality or production of IDT products; 2) Expects our suppliers to have policies and procedures in place which are in compliance with the IDT Conflict Free Metals Policy Statement, and will enable transparency of the IDT supply chain to facilitate our compliance with the Rule; 3) provides and expects our suppliers to cooperate in providing reasonable country of origin and due diligence information with regard to use of 3TG Minerals in our supply chain.

Efforts to Determine the Mine or Location of Origin of the 3TG Minerals in Our Products

Tracing the 3TG Minerals used in our products back to the mine and source country of origin of each such mineral is a complex but important aspect of responsible sourcing. To help establish our supply chain sourcing programs, we have followed currently established industry guidelines such as the Conflict Free Sourcing Initiative of the EICC and the GeSI (“CFSI”), which are taking action to address responsible sourcing through the development of the Conflict-Free Smelter (“CFS”) program which enables companies to source minerals from conflict-free sources.

Through our reasonable country of origin inquiry (“RCOI”) survey process, we adopted the CFSI’s industry approach and traced back the origin of 3TG inerals by identifying smelters, refineries or recyclers and scrap supplier sources. We also utilized the CFSI and its CFS program to trace the mine of origin of the 3TG minerals when the information was available. The CFS program audits smelters and refineries to ensure that all certified smelters and refineries only use the ore that are conflict free from the DRC and covered countries.

Facilities Used to Process the 3TG Minerals in IDT Products

The table below lists the facilities which, to the extent known, were identified by our supply chain as sourcing smelters or refineries for one or more of the 3TG Minerals in our products.

Metal (*)	Smelter Name (*)	Smelter Country (*)	Smelter Identification	
Gold	Aida Chemical Industries Co., Ltd.	JAPAN	CID000019	
Gold	Allgemeine Gold-und Silberscheideanstalt A.G.	GERMANY	CID000035	
Gold	AngloGold Ashanti Córrego do Sítio Mineração	BRAZIL	CID000058	
Gold	Argor-Heraeus SA	SWITZERLAND	CID000077	
Gold	Asahi Pretec Corporation	JAPAN	CID000082	
Gold	Asahi Refining Canada Limited	CANADA	CID000924	
Gold	Asahi Refining USA Inc.	UNITED STATES	CID000920	
Gold	Asaka Riken Co., Ltd.	JAPAN	CID000090	
Gold	Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	TURKEY	CID000103	
Gold	Aurubis AG	GERMANY	CID000113	
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES	CID000128	
Gold	Boliden AB	SWEDEN	CID000157	
Gold	C. Hafner GmbH + Co. KG	GERMANY	CID000176	
Gold	CCR Refinery - Glencore Canada Corporation	CANADA	CID000185	
Gold	Chimet S.p.A.	ITALY	CID000233	
Gold	Dowa	JAPAN	CID000401	
Gold	Eco-System Recycling Co., Ltd.	JAPAN	CID000425	
Gold	Elemetal Refining, LLC	UNITED STATES	CID001322	
Gold	Heimerle + Meule GmbH	GERMANY	CID000694	
Gold	Heraeus Ltd. Hong Kong	CHINA	CID000707	
Gold	Heraeus Precious Metals GmbH & Co. KG	GERMANY	CID000711	
Gold	Ishifuku Metal Industry Co., Ltd.	JAPAN	CID000807	
Gold	Istanbul Gold Refinery	TURKEY	CID000814	
Gold	Jiangxi Copper Company Limited	CHINA	CID000855	
Gold	JX Nippon Mining & Metals Co., Ltd.	JAPAN	CID000937	
Gold	Kennecott Utah Copper LLC	UNITED STATES	CID000969	
Gold	Kojima Chemicals Co., Ltd.	JAPAN	CID000981	
Gold	LS-NIKKO Copper Inc.	KOREA, REPUBLIC OF	CID001078	
Gold	Materion	UNITED STATES	CID001113	
Gold	Matsuda Sangyo Co., Ltd.	JAPAN	CID001119	
Gold	Metalor Technologies (Hong Kong) Ltd.	CHINA	CID001149	
Gold	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE	CID001152	
Gold	Metalor Technologies SA	SWITZERLAND	CID001153	
Gold	Metalor USA Refining Corporation	UNITED STATES	CID001157	
Gold	METALÚRGICA MET-MEX PEÑÓLES, S.A. DE C.V	MEXICO	CID001161	
Gold	Mitsubishi Materials Corporation	JAPAN	CID001188	
Gold	Mitsui Mining and Smelting Co., Ltd.	JAPAN	CID001193	
Gold	Nadir Metal Rafineri San. Ve Tic. A.ª.	TURKEY	CID001220	
Gold	Nihon Material Co., Ltd.	JAPAN	CID001259	
Gold	Ohura Precious Metal Industry Co., Ltd.	JAPAN	CID001325	
Gold	PAMP SA	SWITZERLAND	CID001352	
Gold	PT Aneka Tambang (Persero) Tbk	INDONESIA	CID001397	
Gold	PX Précinox SA	SWITZERLAND	CID001498	
Gold	Rand Refinery (Pty) Ltd.	SOUTH AFRICA	CID001512	
Gold	Republic Metals Corporation	UNITED STATES	CID002510	
Gold	Royal Canadian Mint	CANADA	CID001534	

Gold	SEMPA Joyeria Plateria SA	SPAIN	CID001585	
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CHINA	CID001622	
Gold	SOE Shyolkovsky Factory of Secondary Precious Metals	RUSSIAN FEDERATION	CID001756	
Gold	Solar Applied Materials Technology Corp.	TAIWAN	CID001761	
Gold	Sumitomo Metal Mining Co., Ltd.	JAPAN	CID001798	
Gold	Tanaka Kikinzoku Kogyo K.K.	JAPAN	CID001875	
Gold	The Refinery of Shandong Gold Mining Co., Ltd.	CHINA	CID001916	
Gold	Tokuriki Honten Co., Ltd.	JAPAN	CID001938	
Gold	Umicore Brasil Ltda.	BRAZIL	CID001977	
Gold	Umicore Precious Metals Thailand	THAILAND	CID002314	
Gold	Umicore SA Business Unit Precious Metals Refining	BELGIUM	CID001980	
Gold	United Precious Metal Refining, Inc.	UNITED STATES	CID001993	
Gold	Valcambi SA	SWITZERLAND	CID002003	
Gold	Western Australian Mint trading as The Perth Mint	AUSTRALIA	CID002030	
Gold	Yamamoto Precious Metal Co., Ltd.	JAPAN	CID002100	
Gold	Yokohama Metal Co., Ltd.	JAPAN	CID002129	
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA	CID002224	
Gold	Zijin Mining Group Co., Ltd. Gold Refinery	CHINA	CID002243	
Tin	Alpha	UNITED STATES	CID000292	
Tin	China Tin Group Co., Ltd.	CHINA	CID001070	
Tin	Cooperativa Metalurgica de Rondônia Ltda.	BRAZIL	CID000295	
Tin	CV Ayi Jaya	INDONESIA	CID002570	
Tin	CV Gita Pesona	INDONESIA	CID000306	
Tin	CV Serumpun Sebalai	INDONESIA	CID000313	
Tin	CV United Smelting	INDONESIA	CID000315	
Tin	CV Venus Inti Perkasa	INDONESIA	CID002455	
Tin	Dowa	JAPAN	CID000402	
Tin	Elmet S.L.U. (Metallo Group)	SPAIN	CID002774	
Tin	EM Vinto	BOLIVIA	CID000438	
Tin	Fenix Metals	POLAND	CID000468	
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA	CID000538	
Tin	Jiangxi Ketai Advanced Material Co., Ltd.	CHINA	CID000244	
Tin	Magnu's Mineraiis Metais e Ligas Ltda.	BRAZIL	CID002468	
Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA	CID001105	
Tin	Melt Metais e Ligas S/A	BRAZIL	CID002500	
Tin	Metallic Resources, Inc.	UNITED STATES	CID001142	
Tin	Metallo-Chimique N.V.	BELGIUM	CID002773	
Tin	Mineração Taboca S.A.	BRAZIL	CID001173	
Tin	Minsur	PERU	CID001182	
Tin	Mitsubishi Materials Corporation	JAPAN	CID001191	
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND	CID001314	
Tin	O.M. Manufacturing Philippines, Inc.	PHILIPPINES	CID002517	
Tin	Operaciones Metalurgical S.A.	BOLIVIA	CID001337	
Tin	PT Aries Kencana Sejahtera	INDONESIA	CID000309	
Tin	PT Artha Cipta Langgeng	INDONESIA	CID001399	
Tin	PT ATD Makmur Mandiri Jaya	INDONESIA	CID002503	
Tin	PT Babel Inti Perkasa	INDONESIA	CID001402	
Tin	PT Bangka Prima Tin	INDONESIA	CID002776	

Tin	PT Bangka Tin Industry	INDONESIA	CID001419	
Tin	PT Belitung Industri Sejahtera	INDONESIA	CID001421	
Tin	PT BilliTin Makmur Lestari	INDONESIA	CID001424	
Tin	PT Bukit Timah	INDONESIA	CID001428	
Tin	PT Cipta Persada Mulia	INDONESIA	CID002696	
Tin	PT DS Jaya Abadi	INDONESIA	CID001434	
Tin	PT Eunindo Usaha Mandiri	INDONESIA	CID001438	
Tin	PT Inti Stania Prima	INDONESIA	CID002530	
Tin	PT Justindo	INDONESIA	CID000307	
Tin	PT Mitra Stania Prima	INDONESIA	CID001453	
Tin	PT Panca Mega Persada	INDONESIA	CID001457	
Tin	PT Prima Timah Utama	INDONESIA	CID001458	
Tin	PT Refined Bangka Tin	INDONESIA	CID001460	
Tin	PT Sariwiguna Binasantosa	INDONESIA	CID001463	
Tin	PT Stanindo Inti Perkasa	INDONESIA	CID001468	
Tin	PT Sumber Jaya Indah	INDONESIA	CID001471	
Tin	PT Timah (Persero) Tbk Kundur	INDONESIA	CID001477	
Tin	PT Timah (Persero) Tbk Mentok	INDONESIA	CID001482	
Tin	PT Tinindo Inter Nusa	INDONESIA	CID001490	
Tin	PT Wahana Perkit Jaya	INDONESIA	CID002479	
Tin	Resind Indústria e Comércio Ltda.	BRAZIL	CID002706	
Tin	Rui Da Hung	TAIWAN	CID001539	
Tin	Soft Metais Ltda.	BRAZIL	CID001758	
Tin	Thaisarco	THAILAND	CID001898	
Tin	VQB Mineral and Trading Group JSC	VIET NAM	CID002015	
Tin	White Solder Metalurgia e Mineração Ltda.	BRAZIL	CID002036	
Tin	Yunnan Tin Group (Holding) Company Limited	CHINA	CID002180	
Tin	PT Sukses Inti Makmur	INDONESIA	CID002816	
Tungsten	A.L.M.T. TUNGSTEN Corp.	JAPAN	CID000004	
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.	CHINA	CID002513	
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA	CID000258	
Tungsten	Fujian Jinxin Tungsten Co., Ltd.	CHINA	CID000499	
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	CHINA	CID000875	
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA	CID002494	
Tungsten	Global Tungsten & Powders Corp.	UNITED STATES	CID000568	
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CHINA	CID000218	
Tungsten	H.C. Starck GmbH	GERMANY	CID002541	
Tungsten	Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji	CHINA	CID002579	
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.	CHINA	CID000769	
Tungsten	Hydrometallurg, JSC	RUSSIAN FEDERATION	CID002649	
Tungsten	Japan New Metals Co., Ltd.	JAPAN	CID000825	
Tungsten	Kennametal Huntsville	UNITED STATES	CID000105	
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA	CID002551	
Tungsten	Niagara Refining LLC	UNITED STATES OF AMERICA	CID002589	
Tungsten	Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC	VIET NAM	CID002543	
Tungsten	Tejing (Vietnam) Tungsten Co., Ltd.	VIET NAM	CID001889	
Tungsten	Wolfram Bergbau und Hütten AG	AUSTRIA	CID002044	
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CHINA	CID002320	

Tungsten	Xiamen Tungsten Co., Ltd.	CHINA	CID002082	
Tungsten	H.C. Starck Smelting GmbH & Co.KG	GERMANY	CID002542	
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CHINA	CID002321	
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHINA	CID002318	
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CHINA	CID002317	
Tantalum	H.C. Starck Co., Ltd.	THAILAND	CID002544	
Tantalum	H.C. Starck GmbH Goslar	GERMANY	CID002545	
Tantalum	H.C. Starck GmbH Laufenburg	GERMANY	CID002546	
Tantalum	H.C. Starck Hermsdorf GmbH	GERMANY	CID002547	
Tantalum	H.C. Starck Inc.	UNITED STATES	CID002548	
Tantalum	H.C. Starck Ltd.	JAPAN	CID002549	
Tantalum	H.C. Starck Smelting GmbH & Co.KG	GERMANY	CID002550	
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA	CID001277	
Tantalum	Ulba Metallurgical Plant JSC	KAZAKHSTAN	CID001969	
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	CHINA	CID000211	
Tantalum	Global Advanced Metals Boyertown	UNITED STATES	CID002557	
Tantalum	F&X Electro-Materials Ltd.	CHINA	CID000460	
Tantalum	Solikamsk Magnesium Works OAO	RUSSIAN FEDERATION	CID001769	
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Company Limited	CHINA	CID000801	
Gold	JSC Uralelectromed	RUSSIAN FEDERATION	CID000929	
Gold	Jiangxi Copper Co., Ltd.	CHINA	CID000855	
Tin	An Vinh Joint Stock Mineral Processing Company	VIET NAM	CID002703	
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA	CID002158	
Tantalum	Global Advanced Metals Aizu	JAPAN	CID002558	
Tantalum	Conghua Tantalum and Niobium Smeltry	CHINA	CID000291	
Tantalum	Duoluoshan	CHINA	CID000410	
Tantalum	Exotech Inc.	UNITED STATES	CID000456	
Tantalum	Guangdong Zhiyuan New Material Co., Ltd.	CHINA	CID000616	
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA	CID002492	
Tantalum	Hi-Temp Specialty Metals, Inc.	UNITED STATES	CID000731	
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINA	CID000914	
Tantalum	Jiujiang Tanbre Co., Ltd.	CHINA	CID000917	
Tantalum	LSM Brasil S.A.	BRAZIL	CID001076	
Tantalum	Mineração Taboca S.A.	BRAZIL	CID001175	
Tantalum	Plansee SE Liezen	AUSTRIA	CID002540	
Tantalum	Plansee SE Reutte	AUSTRIA	CID002556	
Tantalum	Taki Chemicals	JAPAN	CID001869	
Tantalum	Telex Metals	UNITED STATES	CID001891	
Tantalum	Zhuzhou Cemented Carbide	CHINA	CID002232	
Tantalum	Mitsui Mining and Smelting Co., Ltd.	JAPAN	CID001192	
Tantalum	D Block Metals, LLC	UNITED STATES OF AMERICA	CID002504	
Tantalum	Yichun Jin Yang Rare Metal Co., Ltd.	CHINA	CID002307	
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.	CHINA	CID002513	
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHINA	CID002315	
Tungsten	Ganzhou Non-ferrous Metals Smelting Co., Ltd.	CHINA	CID000868	

Tungsten	H.C. Starck Smelting GmbH & Co.KG	GERMANY	CID002542	
Tungsten	Hunan Chenzhou Mining Co., Ltd.	CHINA	CID000766	
Tungsten	Kennametal Fallon	UNITED STATES	CID000966	
Tungsten	Pobedit, JSC	RUSSIAN FEDERATION	CID002532	
Tungsten	Dayu Weiliang Tungsten Co., Ltd.	CHINA	CID000345	
Tungsten	Vietnam Youngsun Tungsten Industry Co., Ltd.	VIET NAM	CID002011	

IDT Due Diligence Framework

IDT has exercised due diligence on the source and chain of custody of our 3TG Minerals to identify minerals originating from the Covered Countries that are not from scrap or recycled materials. IDT's due diligence process has been designed and implemented based on the framework set forth by the OECD in its due diligence guidance materials. Our 3TG Minerals due diligence process in calendar year 2016 included each of the five OECD-recommended steps:

1. **Establishment of Strong Company Management System.**

IDT has established a management system for complying with the applicable rules and industry guidelines. Overseeing this system is the Conflict Minerals Compliance Committee which includes representatives from Legal, Quality, Manufacturing, Environmental-Health & Safety, and Supply Chain/Procurement. Supplier outreach and data collection is handled by the subject-matter expert within the Quality organization, who receives significant support from numerous cross-functional team members. The Quality team leader also is responsible for implementation and oversight of the due diligence process. He is supported by the Legal Department, and the Supply Chain and Procurement teams in his efforts to ensure timely gathering of customer responses and other supply chain data, and in performing his validation and documentation responsibilities.

2. **Identify and assess risks in the supply chain.**

IDT has made reasonable efforts to identify suppliers that supply products that may potentially contain 3TG Minerals by conducting a supply chain survey using the EICC and GESI Conflict Minerals Reporting Template, requesting suppliers to identify smelters and refiners and countries of origin of the 3TG Minerals in products they produce or supply for/to IDT; following up with suppliers that do not respond to our request to complete the template until they do; comparing smelters and refiners identified by the supply chain survey against the list of facilities that have received a "conflict free" designation from the CFS program; and maintaining documentation of reasonable efforts we have made to complete these risk assessment steps. Responses also are reviewed and flagged for further follow up if they raise any concerns, and key risks in the supply chain are identified and addressed so that such concerns and risks can be eliminated.

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

IDT has and will continue to make reasonable efforts to encourage suppliers who are sourcing from non-conflict free smelters to use conflict free smelters and refiners (as identified in the CFS program and other industry-developed third-party audit mechanisms). If a supplier fails to remedy the risks identified by our risk assessment, the Conflict Minerals Compliance Committee will escalate to executive management for a determination on whether the supplier should be rejected. Factors that will be considered in such a decision will include: i) dedication to continued efforts to become compliant; ii) whether an alternative supplier is available; iii) cost of using a new supplier; iv) existing competitive bids; v) whether the supplier is a single source; vi) other relevant risk factors or potential risk factors. In the event IDT were to continue use of a non-compliant supplier due to inherent limitations of the supply chain, IDT would use reasonable efforts to require supplier to generate a correction plan and to work with CFS compliant smelters and refiners.

4. **Encourage independent, third-party audits of smelters' and refiners' due diligence practices.**

IDT does not have a direct relationship with any 3TG Mineral smelters or refiners. Thus, IDT is not able to perform a direct audit of the entities that put 3TG Minerals into our supply chain. However, IDT does rely upon industry efforts, including EICC and CFSI efforts to influence smelters and refiners to undergo audits and become certified through CFSI's certification program. We rely upon summary audit reports on compliance status for smelters generated by the CFS program to validate the responses received from suppliers to our RCOI process and address red flags identified in Step 2, above. We believe our efforts meet the diligence requirements set out in the OECD guidance.

5. **Report annually on supply chain due diligence.**

IDT files its Form SD and Conflict Minerals Report annually, in compliance with the Act and the Rule. In addition to this annual report, IDT publishes its conflict free sourcing policy statement on the IDT.com website at:

<http://www.idt.com/about/corporate-responsibility-citizenship/conflict-free-metals-policy>

Inherent Limitations on Due Diligence Measures

As a downstream purchaser of 3TG Minerals, IDT's due diligence measures can provide only reasonable, not absolute, assurance regarding the source and chain of custody of the 3TG Minerals in or used to produce our products. Our due diligence processes necessarily rely on the data supplied by our direct suppliers. Those direct suppliers, in turn, rely on similar information provided within their supply chains to identify the original sources of the 3TG Minerals. In addition, IDT relies on information collected and provided by independent third-party audit programs.

Results of Due Diligence Measures Taken

Due to the level of complexity of our products and the respective supply chains, it will take additional time and resources for a number of our suppliers to verify the source mines and country of origin of all of the 3TG Minerals used by their smelters. We are committed to continuing the use of our supply chain due diligence processes, leveraging the industry standard CFS program, and updating our supplier RCOI information on an ongoing basis as we continue to develop additional transparency into our supply chain. However, as of the date of this filing, based on the performance of our due diligence procedures noted above for the calendar year ended December 31, 2016, we are not able to accurately trace and identify the source mine, country of origin and chain of custody of all the 3TG Minerals that are necessary to the functionality or production of our products.

CONFLICT MINERALS REPORT

The Conflict Minerals Report ("CMR") for calendar year ended December 31, 2016 is filed with the SEC as Exhibit 1.01 to Form SD and is available at <http://ir.idt.com/sec.cfm?DocType=&DocTypeExclude=&SortOrder=FilingDate%20Descending&Year=&PageNum=4&FormatFilter=>