

LITTELFUSE INC /DE

FORM SD (Specialized Disclosure Report)

Filed 05/31/17

Address	8755 WEST HIGGINS ROAD CHICAGO, IL 60631
Telephone	773-628-1000
CIK	0000889331
Symbol	LFUS
SIC Code	3613 - Switchgear and Switchboard Apparatus
Industry	Electrical Components & Equipment
Sector	Industrials
Fiscal Year	12/31

**UNITED STATES
SECURITIES AND EXCHANGE COMMISSION**

Washington, D.C. 20549

FORM SD
Specialized Disclosure Report

LITTELFUSE, INC.

(Exact name of registrant as specified in its charter)

Delaware

(State or other jurisdiction
of incorporation or organization)

0-20388

(Commission File Number)

36-3795742

(IRS Employer
Identification No.)

8755 W. Higgins Road, Suite 500

Chicago, IL

(Address of principal executive offices)

60631

(Zip Code)

Meenal A. Sethna

(773) 628-1000

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

Check the appropriate box below 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.
-

Section 1 – Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

This Specialized Disclosure Report on Form SD (“Form SD”) of Littelfuse, Inc. for the year ended December 31, 2016 is presented to comply with Rule 13p-1 under the Securities Exchange Act of 1934, as amended (the “Exchange Act”). Rule 13p-1 under the Exchange Act provides that a registrant must file this specialized disclosure report on Form SD if it manufactures or contracts to manufacture products for which certain “Conflict Minerals” (as defined below) are necessary to the functionality or production of such products. Conflict Minerals are defined as (i) cassiterite, columbite-tantalite, gold, wolframite, or their derivatives, which are limited to tin, tantalum, tungsten, and gold, or (ii) any other mineral or its derivatives determined by the U.S. Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country (collectively, the “Covered Countries”).

As required for products that contain the Conflict Minerals, Littelfuse, Inc. conducted in good faith a reasonable country of origin inquiry that it believes was reasonably designed to determine whether any of the necessary Conflict Minerals contained in its products manufactured in calendar year 2016 originated in the Covered Countries. Littelfuse, Inc.’s Conflict Minerals Report, which describes this inquiry and other information, is provided as an exhibit to this report and is also publicly available on its website at <http://investor.littelfuse.com/governance.cfm>.

Item 1.02 Exhibit

The Conflict Minerals Report is attached as Exhibit 1.01 to this Form SD.

Item 2.01 Exhibits

The following exhibit is filed as part of this Form SD.

<u>Exhibit No.</u>	<u>Description</u>
1.01	Littelfuse, Inc. Conflict Minerals Report for the Year Ended December 31, 2016.

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.

LITTELFUSE, INC.

By: /s/ Meenal A. Sethna

Meenal A. Sethna

Executive Vice President and Chief Financial Officer

Date: May 31, 2017

LITTELFUSE, INC.**Conflict Minerals Report****For the Year Ended December 31, 2016**

This Conflict Minerals Report (“Report”) of Littelfuse, Inc. and its consolidated subsidiaries (collectively, “Company,” “we” or “our”) for the year ended December 31, 2016, is filed in accordance with Rule 13p-1 under the Securities Exchange Act of 1934, as amended (the “Rule”). The Rule requires the disclosure of certain information if a registrant manufactures or contracts to manufacture products for which certain “Conflict Minerals” (as defined below) are necessary to the functionality or production of such products. Conflict Minerals are defined as (i) cassiterite, columbite-tantalite, gold, wolframite, or their derivatives, which are limited to tin, tantalum, tungsten, and gold, or (ii) any other mineral or its derivatives determined by the U.S. Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country (collectively, the “Covered Countries”).

The Company’s operations, including through its subsidiaries, may at times manufacture, or contract to manufacture, products for which Conflict Minerals are necessary to the functionality or production of those products. Pursuant to the acquisition and integration during 2016 of three key businesses, the number of suppliers in our supply chain greatly increased during the year. Therefore, we broadened the scope of our reasonable country of origin inquiry (“RCOI”) regarding the Conflict Minerals in our manufactured products during 2016.

This RCOI was reasonably designed to determine whether any of the Conflict Minerals originated from the Covered Countries and whether any of the Conflict Minerals may be from recycled or scrap sources. The results of our reasonable country of origin inquiry regarding the Conflict Minerals, as well as our additional due diligence regarding the sources of the Conflict Minerals, are contained in this Report.

The report presented herein is not audited.

1. Company Overview

We are one of the world’s leading suppliers of circuit protection products for the electronics, automotive, and industrial markets, with expanding platforms in sensors and power control components and modules. In addition to circuit protection products and solutions, the Company offers electronic reed switches and sensors, automotive sensors for comfort and safety systems and a comprehensive line of highly reliable electromechanical and electronic switch and control devices for commercial and specialty vehicles, as well as protection relays and power distribution centers for the safe control and distribution of electricity.

The Company’s reporting segments consist of the Electronics segment, the Automotive segment and the Industrial segment, as described more fully in Part I, Item 1 of the Company’s annual report on Form 10-K for the year ended December 31, 2016. Such annual report is available free of charge through the Investor Relations section of the Company’s website at <http://investor.littelfuse.com/annuals.cfm>. The information contained in the Company’s website is not incorporated by reference into this Report and should not be considered part of this report.

Supply Chain

The Company manufactures, or contracts for the manufacture of, a wide range of products that contain Conflict Minerals but we do not purchase ore or unrefined Conflict Minerals directly from mines, smelters or refiners and generally are many levels downstream from these market participants. For this reason, we rely on the information provided by our direct suppliers along with appropriate due diligence processes. Through the process described in this Report, we seek to ensure that our sourcing practices are consistent with our guiding principles on responsibly sourcing the Conflict Minerals and to encourage responsible minerals sourcing in our supply chain.

2. Reasonable Country of Origin Inquiry

Our RCOI began with a review of all our materials suppliers that, due to the nature of their business, utilize Conflict Minerals (referred to as “direct suppliers”). Direct suppliers were contacted to complete the Electronic Industry Citizenship Coalition-Global e-Sustainability Initiative Conflict Minerals Common Reporting Template (the “EICC/GeSI Template”). The EICC/GeSI Template is regarded as the most commonly accepted reporting tool for conflict minerals content and sourcing information worldwide. Our suppliers were also provided with training materials on how to complete the EICC/GeSI Template. The EICC/GeSI Template asked the suppliers, among other things, to disclose the origin of any Conflict Minerals used in their manufacturing processes and to identify the Conflict Minerals processing facilities within their supply chains.

This survey of direct suppliers represented 36% of our 2016 expenditure for direct materials. The Company obtained responses from 91% of our direct suppliers. Based on the survey responses obtained, we have reason to believe that some of the Conflict Minerals supplied to us may have originated in the Covered Countries, and we have reason to believe that certain of the Conflict Minerals came from recycled or scrap sources.

Our RCOI process was reasonably designed and performed in good faith, however, 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.

3. Due Diligence Process

Summarized below is our due diligence process, the components of which conform to, in all material respects, the framework in the Third Edition of the Organization for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and related supplements for gold, tantalum, tin and tungsten.

a) Establish Company Management System

- Adopted a Conflict Free Statement which provides that the Company expects its suppliers to continuously monitor both direct and indirect supply chains to avoid procurement of materials from Covered Countries, and to be forthright in sharing compliance information with the Company. We will show preference to suppliers that meet or exceed these requirements.
- Established an internal Conflict Minerals working group.
- Communicated with our direct suppliers through the above-described RCOI.
- Incorporated conflict-free sourcing requirements into our purchase order terms and conditions and supplier quality manual.
- Maintained a supplier qualification program and an ongoing supplier audit program that includes, among other compliance inquiries, questions regarding the suppliers’ conflict minerals programs.

b) Identify and Assess Supply Chain Risks

- Implemented a process to identify suppliers of direct materials and categorize such materials by commodity. This assisted in the determination of the direct suppliers of products that may contain Conflict Minerals.
- Surveyed all direct suppliers to determine suppliers that provide products to the Company with Conflict Minerals.

- Conducted the RCOI described above to identify the smelters and refiners that contribute Conflict Minerals to the Company’s products.
- Reviewed and compared the smelters and refiners identified by direct suppliers against the list of smelter and refiner facilities that have received a “conflict free” designation through the EICC/GeSI Conflict Free Smelter Program.

c) *Design and Implement a Strategy to Respond to Identified Risk*

- Conducted follow-up with direct suppliers that did not respond to the survey.
- Collaborated with our direct suppliers to investigate any smelter that did not have a conflict free designation through the EICC/GeSI Conflict Free Smelter Program or was not in the process of recertifying for such designation.

d) *Carry out Independent Third Party Audit*

- The Company does not have a direct relationship with smelters and refiners and does not perform or direct audits of these entities within our supply chain. However, we do rely upon industry efforts to influence smelters and refiners to be audited and certified through the Conflict-Free Sourcing Initiative (“CFSI”).

e) *Report on Supply Chain Due Diligence*

- This Report is available on our website at <http://investor.littelfuse.com/governance.cfm>. In addition to this Report, our Conflict Free Statement is also available on our website at <http://www.littelfuse.com/about-us/supplier-quality/conflict-free-statement.aspx>.

4. Due Diligence Results

We solicited 457 direct suppliers and received a response from 91% of them. 95% of our responding direct suppliers responded to us that the material they supply does not contain Conflict Minerals that originated from the Covered Countries.

From the information provided to the Company by its direct suppliers, we identified 155 unique smelters or refiners in our supply chain. 108 (70%) are participating in the CFSI and are either in compliance with the CFSI audit protocols or active in the application process. We continue to monitor and evaluate all our direct suppliers and the smelters and refiners they report with the ultimate goal of becoming 100% conflict free.

The smelters or refiners participating in the CFSI, as reported by our suppliers, were as follows:

Metal	Smelter ID	Smelter Name	Location Country	Status*
Tin	CID000295	Cooperativa Metalurgica de Rondonia Ltda.	Brazil	Expired
Tin	CID000438	EM Vinto	Bolivia (Plurinational State of)	Compliant
Tin	CID001105	Malaysia Smelting Corporation (MSC)	Malaysia	Recertification in Process
Tin	CID001173	Mineracao Taboca S.A.	Brazil	Compliant
Tin	CID001182	Minsur	Peru	Compliant
Tin	CID001453	PT Mitra Stania Prima	Indonesia	Compliant
Tin	CID001477	PT Timah (Persero) Tbk Kundur	Indonesia	Compliant
Tin	CID001482	PT Timah (Persero) Tbk Mentok	Indonesia	Compliant
Tin	CID001490	PT Tinindo Inter Nusa	Indonesia	Compliant
Tin	CID001898	Thaisarco	Thailand	Compliant
Tin	CID002036	White Solder Metalurgia e Mineracao Ltda.	Brazil	Compliant
Tin	CID002180	Yunnan Tin Company Limited	China	Compliant

<u>Metal</u>	<u>Smelter ID</u>	<u>Smelter Name</u>	<u>Location Country</u>	<u>Status*</u>
Tin	CID002593	CV Tiga Sekawan	Indonesia	Recertification in Process
Tin	CID002773	Metallo Belgium N.V.	Belgium	Compliant
Gold	CID000707	Heraeus Metals Hong Kong Ltd.	China	Compliant
Tin	CID001399	PT Artha Cipta Langgeng	Indonesia	Compliant
Tin	CID001460	PT Refined Bangka Tin	Indonesia	Compliant
Tin	CID001539	Rui Da Hung	Taiwan, Province of China	Compliant
Tin	CID002455	CV Venus Inti Perkasa	Indonesia	Compliant
Gold	CID001157	Metalor USA Refining Corporation	United States of America	Compliant
Gold	CID001534	Royal Canadian Mint	Canada	Compliant
Tin	CID000538	Gejiu Non-Ferrous Metal Processing Co., Ltd.	China	Compliant
Tin	CID001337	Operaciones Metalurgical S.A.	Bolivia (Plurinational State of)	Compliant
Tin	CID000292	Alpha	United States of America	Compliant
Tin	CID000468	Fenix Metals	Poland	Recertification in Process
Tin	CID001419	PT Bangka Tin Industry	Indonesia	Compliant
Tin	CID001421	PT Belitung Industri Sejahtera	Indonesia	Compliant
Tin	CID001468	PT Stanindo Inti Perkasa	Indonesia	Compliant
Tin	CID002776	PT Bangka Prima Tin	Indonesia	Compliant
Tin	CID002835	PT Menara Cipta Mulia	Indonesia	Compliant
Gold	CID001916	The Refinery of Shandong Gold Mining Co., Ltd.	China	Expired
Gold	CID000035	Allgemeine Gold-und Silberscheideanstalt A.G.	Germany	Compliant
Gold	CID000694	Heimerle + Meule GmbH	Germany	Compliant
Gold	CID000711	Heraeus Precious Metals GmbH & Co. KG	Germany	Expired
Tin	CID001428	PT Bukit Timah	Indonesia	Compliant
Gold	CID001078	LS-NIKKO Copper Inc.	Korea, Republic of	Recertification in Process
Gold	CID001153	Metalor Technologies S.A.	Switzerland	Compliant
Gold	CID001193	Mitsui Mining and Smelting Co., Ltd.	Japan	Recertification in Process
Gold	CID002030	Western Australian Mint (T/a The Perth Mint)	Australia	Compliant
Tin	CID000315	CV United Smelting	Indonesia	Compliant
Tungsten	CID000875	Ganzhou Huaxing Tungsten Products Co., Ltd.	China	Compliant
Tin	CID001191	Mitsubishi Materials Corporation	Japan	Compliant
Tin	CID001434	PT DS Jaya Abadi	Indonesia	Compliant
Tungsten	CID002082	Xiamen Tungsten Co., Ltd.	China	Compliant
Tin	CID001438	PT Eunindo Usaha Mandiri	Indonesia	Compliant
Tin	CID001458	PT Prima Timah Utama	Indonesia	Compliant
Tin	CID001463	PT Sariwiguna Binasentosa	Indonesia	Compliant
Gold	CID001147	Metalor Technologies (Suzhou) Ltd.	China	Compliant
Gold	CID001149	Metalor Technologies (Hong Kong) Ltd.	China	Compliant

<u>Metal</u>	<u>Smelter ID</u>	<u>Smelter Name</u>	<u>Location Country</u>	<u>Status*</u>
Gold	CID001152	Metalor Technologies (Singapore) Pte., Ltd.	Singapore	Compliant
Tin	CID001070	China Tin Group Co., Ltd.	China	Recertification in Process
Tin	CID001402	PT Babel Inti Perkasa	Indonesia	Compliant
Tin	CID002530	PT Inti Stania Prima	Indonesia	Compliant
Gold	CID001875	Tanaka Kikinzoku Kogyo K.K.	Japan	Compliant
Gold	CID000185	CCR Refinery - Glencore Canada Corporation	Canada	Expired
Gold	CID000920	Asahi Refining USA Inc.	United States of America	Recertification in Process
Gold	CID001161	Metalurgica Met-Mex Penoles S.A. De C.V.	Mexico	Recertification in Process
Gold	CID001980	Umicore S.A. Business Unit Precious Metals Refining	Belgium	Expired
Gold	CID002510	Republic Metals Corporation	United States of America	Compliant
Tin	CID000309	PT Aries Kencana Sejahtera	Indonesia	Compliant
Tin	CID000313	CV Serumpun Sebalai	Indonesia	Compliant
Gold	CID000401	Dowa	Japan	Compliant
Gold	CID000807	Ishifuku Metal Industry Co., Ltd.	Japan	Expired
Gold	CID001188	Mitsubishi Materials Corporation	Japan	Compliant
Gold	CID001761	Solar Applied Materials Technology Corp.	Taiwan, Province of China	Compliant
Gold	CID001622	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	China	Expired
Tin	CID002158	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	China	Compliant
Tin	CID001457	PT Panca Mega Persada	Indonesia	Recertification in Process
Tin	CID002503	PT ATD Makmur Mandiri Jaya	Indonesia	Compliant
Tin	CID002570	CV Ayi Jaya	Indonesia	Compliant
Tin	CID002816	PT Sukses Inti Makmur	Indonesia	Compliant
Tin	CID001908	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	China	Compliant
Gold	CID000058	AngloGold Ashanti Corrego do Sitio Mineracao	Brazil	Expired
Gold	CID000077	Argor-Heraeus S.A.	Switzerland	Expired
Gold	CID000113	Aurubis AG	Germany	Recertification in Process
Gold	CID000128	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	Philippines	Recertification in Process
Gold	CID000157	Boliden AB	Sweden	Recertification in Process
Gold	CID000176	C. Hafner GmbH + Co. KG	Germany	Compliant
Gold	CID000233	Chimet S.p.A.	Italy	Expired
Gold	CID000814	Istanbul Gold Refinery	Turkey	Expired
Gold	CID000924	Asahi Refining Canada Ltd.	Canada	Recertification in Process
Gold	CID000969	Kennecott Utah Copper LLC	United States of America	Recertification in Process
Gold	CID001352	PAMP S.A.	Switzerland	Expired

<u>Metal</u>	<u>Smelter ID</u>	<u>Smelter Name</u>	<u>Location Country</u>	<u>Status*</u>
Gold	CID001993	United Precious Metal Refining, Inc.	United States of America	Recertification in Process
Tin	CID001142	Metallic Resources, Inc.	United States of America	Compliant
Gold	CID000019	Aida Chemical Industries Co., Ltd.	Japan	Recertification in Process
Gold	CID000082	Asahi Pretec Corp.	Japan	Compliant
Gold	CID000090	Asaka Riken Co., Ltd.	Japan	Compliant
Tin	CID000244	Jiangxi Ketai Advanced Material Co., Ltd.	China	Compliant
Tin	CID000402	Dowa	Japan	Compliant
Gold	CID000937	JX Nippon Mining & Metals Co., Ltd.	Japan	Compliant
Gold	CID000981	Kojima Chemicals Co., Ltd.	Japan	Recertification in Process
Gold	CID001119	Matsuda Sangyo Co., Ltd.	Japan	Compliant
Gold	CID001259	Nihon Material Co., Ltd.	Japan	Expired
Gold	CID001325	Ohura Precious Metal Industry Co., Ltd.	Japan	Compliant
Gold	CID001798	Sumitomo Metal Mining Co., Ltd.	Japan	Compliant
Gold	CID001938	Tokuriki Honten Co., Ltd.	Japan	Expired
Tungsten	CID000568	Global Tungsten & Powders Corp.	United States of America	Compliant
Gold	CID001585	SEMPSA Joyeria Plateria S.A.	Spain	Expired
Tin	CID001758	Soft Metais Ltda.	Brazil	Compliant
Gold	CID002224	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	China	Expired
Tin	CID002500	Melt Metais e Ligas S.A.	Brazil	Compliant
Gold	CID001113	Materion	United States of America	Compliant
Tungsten	CID002044	Wolfram Bergbau und Hutten AG	Austria	Compliant
Tin	CID002468	Magnu's Mineraiis Metais e Ligas Ltda.	Brazil	Compliant
Tungsten	CID000004	A.L.M.T. TUNGSTEN Corp.	Japan	Compliant
Tungsten	CID000105	Kennametal Huntsville	United States of America	Compliant
Tungsten	CID000218	Guangdong Xianglu Tungsten Co., Ltd.	China	Compliant
Tungsten	CID000258	Chongyi Zhangyuan Tungsten Co., Ltd.	China	Compliant
Tantalum	CID000410	Duoluoshan	China	Expired
Gold	CID000425	Eco-System Recycling Co., Ltd.	Japan	Compliant
Tantalum	CID000456	Exotech Inc.	United States of America	Compliant
Tantalum	CID000460	F&X Electro-Materials Ltd.	China	Compliant
Tungsten	CID000499	Fujian Jinxin Tungsten Co., Ltd.	China	Compliant
Tungsten	CID000769	Hunan Chunchang Nonferrous Metals Co., Ltd.	China	Compliant
Tantalum	CID001192	Mitsui Mining and Smelting Co., Ltd.	Japan	Compliant
Tantalum	CID001277	Ningxia Orient Tantalum Industry Co., Ltd.	China	Compliant
Gold	CID001512	Rand Refinery (Pty) Ltd.	South Africa	Recertification in Process
Tantalum	CID001769	Solikamsk Magnesium Works OAO	Russian Federation	Compliant
Tantalum	CID001869	Taki Chemical Co., Ltd.	Japan	Recertification in Process
Tantalum	CID001969	Ulba Metallurgical Plant JSC	Kazakhstan	Recertification in Process
Gold	CID002003	Valcambi S.A.	Switzerland	Compliant
Gold	CID002100	Yamamoto Precious Metal Co., Ltd.	Japan	Compliant

Metal	Smelter ID	Smelter Name	Location Country	Status*
Gold	CID002129	Yokohama Metal Co., Ltd.	Japan	Compliant
Tungsten	CID002320	Xiamen Tungsten (H.C.) Co., Ltd.	China	Compliant
Tungsten	CID002494	Ganzhou Seadragon W & Mo Co., Ltd.	China	Compliant
Tungsten	CID002513	Chenzhou Diamond Tungsten Products Co., Ltd.	China	Compliant
Tungsten	CID002541	H.C. Starck Tungsten GmbH	Germany	Compliant
Tantalum	CID002545	H.C. Starck Tantalum and Niobium GmbH	Germany	Compliant
Tantalum	CID002548	H.C. Starck Inc.	United States of America	Compliant
Tantalum	CID002557	Global Advanced Metals Boyertown	United States of America	Compliant
Tungsten	CID002317	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	China	Compliant
Gold	CID001977	Umicore Brasil Ltda.	Brazil	Expired
Tungsten	CID002542	H.C. Starck Smelting GmbH & Co. KG	Germany	Compliant
Tin	CID002774	Metallo Spain S.L.U.	Spain	Compliant
Tin	CID002870	PT Lautan Harmonis Sejahtera	Indonesia	Compliant
Tungsten	CID000966	Kennametal Fallon	United States of America	Compliant
Gold	CID000041	Almalyk Mining and Metallurgical Complex (AMMC)	Uzbekistan	Recertification in Process
Gold	CID000328	Daejin Indus Co., Ltd.	Korea, Republic of	Expired
Gold	CID000359	DSC (Do Sung Corporation)	Korea, Republic of	Expired
Gold	CID000493	OJSC Novosibirsk Refinery	Russian Federation	Recertification in Process
Gold	CID000823	Japan Mint	Japan	Recertification in Process
Gold	CID000855	Jiangxi Copper Co., Ltd.	China	Expired
Gold	CID000927	JSC Ekaterinburg Non-Ferrous Metal Processing Plant	Russian Federation	Expired
Gold	CID000929	JSC Uralelectromed	Russian Federation	Recertification in Process
Gold	CID000957	Kazzinc	Kazakhstan	Expired
Gold	CID001029	Kyrgyzaltyn JSC	Kyrgyzstan	Expired
Gold	CID001204	Moscow Special Alloys Processing Plant	Russian Federation	Expired
Gold	CID001220	Nadir Metal Rafineri San. Ve Tic. A.S.	Turkey	Expired
Gold	CID001326	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	Russian Federation	Expired
Gold	CID001386	Prioksky Plant of Non-Ferrous Metals	Russian Federation	Recertification in Process
Gold	CID001397	PT Aneka Tambang (Persero) Tbk	Indonesia	Expired
Gold	CID001498	PX Precinox S.A.	Switzerland	Expired
Gold	CID001573	Schone Edelmetaal B.V.	Netherlands	Expired

* Based on information available from the Conflict-Free Sourcing Initiative as of May 11, 2017.

5. Future Risk Mitigation Efforts

The Company has taken or intends to undertake the following additional steps during the next compliance period. These steps are intended to improve the due diligence conducted to further mitigate the risk that our Conflict Minerals benefit armed groups:

- In connection with the continued integration efforts of the three key businesses we acquired in 2016, we are in the process of centralizing our Conflicts Minerals working group and further ensuring that our processes are consistent throughout the Company.

- Continue to engage our direct suppliers and follow industry standards for 2017 outreach.
- Continue to request that our direct suppliers encourage non-validated smelters or refiners in their supply chain to pursue compliance with an independent conflict-free program, such as the CFSP.
- Become members of the Conflict-Free Sourcing Initiative.
- Planned expansion of the Conflict Minerals working group to increase resources available to assist with supplier communications.

Forward Looking Statement

This report contains forward-looking statements within the meaning of the safe harbor provisions of the Private Securities Litigation Reform Act of 1995. The statements in this report that are not historical facts are intended to constitute "forward-looking statements" entitled to the safe-harbor provisions of the PSLRA. Forward-looking statements give the Company's current expectations or forecasts in future events. These forward-looking statements generally can be identified by the use of such words as "believe," "could," "estimate," "expect," "hope," "may," "plan," "project," "will," and variations of such words and similar expressions. Examples of forward-looking statements include, but are not limited to, statements concerning the additional steps that we intend to take to mitigate the risk that our necessary Conflict Minerals finance or benefit armed groups.

Such forward-looking statements are subject to risks and uncertainties that are often difficult to predict, are beyond the Company's control and could cause actual actions or performance to differ materially from those expressed in the forward-looking statements. These risks and uncertainties include, but are not limited to, (1) the continued implementation of satisfactory traceability and other compliance measures by our direct suppliers on a timely basis or at all, (2) whether smelters and refiners and other market participants responsibly source subject metals, and (3) political and regulatory developments, whether in the Covered Countries, the United States or elsewhere. Readers are cautioned not to place undue reliance on these forward-looking statements, which speak only as of the date of filing of this report. The Company undertakes no obligation to publicly update or revise forward-looking statement whether as a result of new information, future events, or otherwise, except as required by law or rules of the NASDAQ Global Select Market SM.