

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

FORM SD  
Specialized Disclosure Report

**HASBRO, INC.**

(Exact name of registrant as specified in its charter)

**Rhode Island**

(State or other jurisdiction of incorporation or  
organization)

**1-6682**

(Commission File Number)

**05-0155090**

(IRS Employer Identification No.)

**1027 Newport Avenue, Pawtucket, Rhode Island**

(Address of principal executive offices)

**02862**

(Zip Code)

**Deborah Thomas, Executive Vice President and Chief Financial Officer, (401) 431-8697**

(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, and provide the period to which the information in this form applies:

X Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2015.

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## Introduction:

Hasbro, Inc. ("Hasbro," the "Company," "we," "us," or "our") (NASDAQ: HAS) is a global company committed to Creating the World's Best Play Experiences. We strive to do this through deep consumer engagement and the application of consumer insights, the use of immersive storytelling to build our brands, product innovation and development of global business reach. We apply these principles to leverage our owned and controlled brands, including LITTLEST PET SHOP, MAGIC: THE GATHERING, MONOPOLY, MY LITTLE PONY, NERF, PLAY-DOH and TRANSFORMERS, as well as our premier partner brands. From toys and games to television programming, motion pictures, digital gaming and a comprehensive consumer products licensing program, Hasbro fulfills the fundamental need for play and connection for children and families around the world. We are headquartered in Pawtucket, Rhode Island and have approximately 5,000 employees worldwide, approximately 2,500 of whom are located in the United States.

At Hasbro, corporate social responsibility ("CSR") is powered by our belief that every day is a chance to be better. Our deep commitment to CSR reflects our desire to help build a safer, more sustainable world for future generations. Part of this commitment is working with our vendors to ensure that they operate responsibly and adopt best practices.

Some of Hasbro's products include electronics and other components that contain tin, tungsten, tantalum and/or gold (referred to collectively hereafter as "conflict minerals" or "3TG"). Accordingly, we are subject to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (the "Dodd-Frank Act" or the "Act") and Rule 13p-1 under the Securities and Exchange Act of 1934 (the "Final Rule").

Hasbro has a Conflict Minerals Policy which expresses our commitment to (i) sourcing components and materials from companies that share our values around human rights, ethics, and corporate social responsibility, (ii) utilizing due diligence practices to identify conflict minerals and their sources in our supply chain and (iii) ultimately achieving the objective that any 3TG included in our products are sourced from smelters identified as conflict free or are otherwise subject to contract manufacturer diligence sufficient to determine that such minerals are not being used to support armed conflict in the Democratic Republic of the Congo and adjoining countries. Hasbro's Conflicts Minerals Policy can be found at the following internet address {<http://csr.hasbro.com/en-us/csr/conflict-minerals-policy>}.

## Section 1 - Conflict Minerals Disclosures

### Item 1.01 Conflict Minerals Disclosure and Report

Hasbro has determined that during the 2015 calendar year, we contracted to manufacture certain products containing 3TG and have determined that these minerals are necessary to the functionality or production of these products.

We conducted a Reasonable Country of Origin Inquiry ("RCOI") to assess whether the necessary conflict minerals in our products originated from the Covered Countries<sup>1</sup>. Under our RCOI methodology, Hasbro undertook an applicability assessment to identify the products containing 3TG and the relevant contract manufacturers of those products.

During 2015 substantially all of our products were manufactured in third party vendor facilities (referred to hereafter as "contract manufacturers"). These contract manufacturers are primarily located in the People's Republic of China, although we use contract manufacturers located in other countries in Asia, such as India. In addition, a third party manufactured product for us in two facilities that were previously owned by us, one located in East Longmeadow, Massachusetts and the other in Waterford, Ireland. These facilities were owned by us through August 31, 2015, at which point they were sold to the Cartamundi Group, who will continue to operate them and manufacture game products for us at those facilities under a manufacturing agreement. Due to the sale of the facilities in East Longmeadow, Massachusetts and Waterford, Ireland, Hasbro's RCOI included these factories as contract manufacturers.

Following the applicability assessment, Hasbro sent surveys to all of its contract manufactures globally who were identified as producing products that could contain 3TG. To identify the applicable contract manufacturers, Hasbro filtered out contract manufacturers supplying Hasbro with commodities identified not to contain 3TG.

Utilizing the methodology above and based on the information provided by our business units and gathered from our sourcing and technology systems and records, we identified a total of 50 contract manufacturers globally whom we believed may be at-risk for sourcing 3TG, directly or indirectly, from the Covered Countries, for use in products manufactured for us. All 50 of these contract manufacturers were surveyed using a technology platform that employs the conflict minerals reporting template based on the questionnaire developed by the Electronic Industry Citizenship Coalition – Global eSustainability Initiative (EICC/GeSI).

Many of Hasbro's contract manufacturers are not subject to the Dodd-Frank Act or initially were unfamiliar with the Act 's reporting requirements. Beginning in 2013 and continuing through 2015 Hasbro conducted training with all of our contract manufacturers, to educate these manufacturers as to the requirements of the Act related to conflict minerals and to help them understand the importance of working towards removal from the supply chain of any 3TG that may be funding conflict in the Covered Countries. We developed, produced and uploaded a web-based training program that provided a summary of the law related to conflict minerals, our obligations under the Act, and the role of our applicable contract manufacturers in assisting us to comply with the requirements of the Act related to conflict minerals. Since most of our contract manufactures are based in China, Hasbro also conducted an in-person training session with our China-based contract manufacturers. The training materials were translated into simplified Chinese for our contract manufacturers located in China. During the in-person training Hasbro provided step-by-step instructions for logging onto and responding to the Hasbro conflict minerals electronic reporting survey. Hasbro maintains an e-mail box and gives contact information for specified point people within Hasbro's sourcing organization for contract manufacturers to submit questions to about the Final Rule or for seeking assistance in completing the conflict minerals reporting survey.

Hasbro sent surveys to the 50 contract manufacturers who were identified as potentially sourcing 3TG for our products in 2015. Similar to 2014, in 2015 we surveyed all contract manufacturers identified in our applicability assessment at the product category level (our four product categories being Boys, Girls, Preschool and Games, each of which is described in Section 4 of the attached Conflict Minerals Report).

Relevant contract manufacturers received a separate survey for each of the four product categories for which they supplied products or components to us. As such, an individual contract manufacturer could receive up to four separate surveys if they were supplying products for each of our Boys, Girls, Preschool and Games categories. We sent an aggregate of 100 surveys to the 50 contract manufacturers we surveyed in 2015. Of the 50 contract manufacturers surveyed, all 50 responded to surveys, representing a 100% response rate. This compares with an 88% response rate to our contract manufacturer surveys in 2014.

In our survey results, 11 of our contract manufacturers out of the 50 surveyed indicated potential sourcing of 3TG from the Covered Countries. The other 39 contract manufacturers indicated in their survey responses that they were not sourcing any 3TG from the Covered Countries. Of the 11 contract manufacturers who identified potential sourcing of 3TG from the Covered Countries, each such contract manufacturer provided a list of smelters from whom they were sourcing 3TG. A complete list of those smelters, along with any other smelters identified by our contract manufacturers who indicated that they were not sourcing 3TG from the Covered Countries, is attached as an exhibit to our Conflict Minerals Report. Although many of the smelters are designated as Conflict Free Smelter Program (CFSP) compliant, we note that 10 of the 11 contract manufacturers who indicated potential sourcing of 3TG from the Covered Countries included one or more smelters in their smelter list that were currently not designated as CFSP compliant and not currently seeking such designation.

As is discussed in the attached Conflicts Minerals Report, we are currently unable to determine the specific mine location or the country of origin for the 3TG used in our products that is processed in non-CFSP compliant smelters identified by our contract manufacturers in their respective lists of smelters. Therefore, as discussed in more detail in our Conflict Minerals Report included as Exhibit 1.01 to this report, at this point we cannot determine if any of the 3TG in our products or components are in fact funding any armed conflict in the covered countries. Accordingly, we have conducted due diligence on the source and chain of custody of the necessary conflict minerals contained in our products as described in the Conflict Minerals Report included as Exhibit 1.01.

#### **Item 1.02 Exhibit**

In accordance with Rule 13p-1 under the Securities Exchange Act of 1934 ("Rule 13p-1"), this Specialized Disclosure Form ("Form SD") and the associated Conflict Minerals Report are posted to a publically available Internet site at the following internet address <http://csr.hasbro.com/has15-conflict-minerals-report.com>

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## Section 2 - Exhibits

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

<sup>1</sup> The Democratic Republic of Congo and its adjoining countries (Angola, Burundi, Republic of the Congo, Central African Republic, Rwanda, South Sudan, Republic of Tanzania, Uganda, and Zambia).

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**Signature**

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.

Hasbro, Inc.

(Registrant)

By: /s/ Deborah Thomas

May 27, 2016

Deborah Thomas  
Executive Vice President and Chief Financial Officer  
(Signature and Title)

(Date)

## Exhibit 1.01 - Conflict Minerals Report (CMR)

### Conflict Minerals Report of Hasbro, Inc.

#### Section 1: Introduction and Company Overview

This is the Conflict Minerals Report of Hasbro, Inc. (herein referred to as "Hasbro," the company, "we," "us," or "our ") for calendar year 2015 in accordance with Rule 13p-1 under the Securities and Exchange Act of 1934 ("Rule 13p-1"). Numerous terms in this report are defined in Rule 13p-1 and Form SD and the reader is invited to refer to those sources for complete definitions of these terms.

#### Section 2: Due diligence framework

Hasbro designed its due diligence measures to conform, in all material respects, with the internationally recognized due diligence framework as set forth in the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD, 2013) ("OECD Framework") and related supplements for gold and for tin, tantalum and tungsten.

#### Section 3: Due diligence measures undertaken

Hasbro's due diligence efforts for 2015 (which incorporated steps taken in 2014 as part of our establishment of a conflicts mineral policy and management systems) included the following steps:

##### Establish company management systems: Hasbro:

- Established a policy statement in 2013 with respect to sourcing of minerals from the Democratic Republic of Congo ("DRC") and its adjoining countries and published this statement online at the following internet address {<http://csr.hasbro.com/en-us/csr/conflict-minerals-policy>}. This policy was updated and enhanced in both 2014 and 2015 to reinforce our commitment to the ultimate goal that any conflict minerals included in our products are sourced from smelters that are identified as conflict free or are otherwise subject to contract manufacturer diligence sufficient to determine that such minerals are not being used to fund armed conflict in the DRC and its adjoining countries ("the Covered Countries").
  - Established an internal governance structure in 2013 that since then has been overseen by members of our executive management team, and includes a cross functional conflict minerals steering committee and working group comprised of representatives from the Global Government and Regulatory Affairs, Corporate Social Responsibility, Global Sourcing, Legal, Finance and Internal Audit functions of Hasbro.
  - Continued to engage with contract manufacturers that Hasbro believed were most likely to supply products containing 3TG, informing them at the start of the RCOI that Hasbro is subject to Section 1502 of the Dodd-Frank Act, and that their cooperation in responding to the survey is expected.
  - Conducted supply chain surveys based on the EICC/GeSI conflict minerals questionnaire. Surveys were sent to the 50 contract manufacturers identified during our applicability assessment and RCOI as potentially sourcing 3TG from the Covered Countries for our products. In 2015, we employed separate surveys for each of the Company's four product categories: Boys, Girls, Preschool and Games, for all relevant contract manufacturers, such that all applicable contract manufacturers could receive up to four individual surveys if they were providing products in each of the Company's four product categories.
  - Hasbro's Executive Vice President, Chief Global Operations and Business Development Officer issued a response request letter to all contract manufacturers who were non-responsive or who submitted responses that were incomplete in the 2014 reporting year survey. In part due to this executive outreach, 100% of Hasbro's in-scope contract manufacturers responded to the conflict minerals survey in the 2015 compliance year.
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- Provided surveyed contract manufacturers with links to conflict minerals web-based training presentations that included an overview of the conflict minerals rules under the Dodd-Frank Act, as well as trainings on how to complete the survey.
- Maintained a grievance mechanism in 2015 to enable the reporting of grievances via the Hasbro Conflict Minerals email.
- Hasbro plans to retain conflict minerals program documentation for at least 5 years.

### **Identify and assess risks in the supply chain**

- Contract manufacturers surveyed were asked to identify smelters and refiners that process conflict minerals contained in our products, including country of origin of the 3TG minerals, based on the EICC/GeSI conflict minerals questionnaire.
- Every survey received was logged in our technology platform and reviewed by Hasbro personnel.
- Non-responsive contract manufacturers and survey responses that we believed to be incomplete or inconsistent were identified for additional follow-up during the RCOI.
- Reasons for follow-up with contract manufacturers included, but were not limited to, that the contract manufacturer did not provide a complete or accurate smelter list or did not receive complete conflicts mineral sourcing information from all of their relevant suppliers. Contract manufacturers who did not provide the country of origin information in their survey responses were also sent a follow-up communication requesting that they provide additional sourcing information.
- Smelters identified by contract manufacturers surveyed by Hasbro were compared against the lists maintained by the Conflict Free Smelter Initiative (CFSI) and the smelter list prepared by the U.S. Department of Commerce.

### **Design and implement a strategy to respond to identified risks**

- Executive members of the steering committee met three times during the 2015 conflict minerals program to review the results of the applicability assessment, survey review and associated risks.
  - Contract manufacturers that did not respond to Hasbro's initial survey request were sent escalation letters requesting that they provide the information requested.
  - Contract manufacturers who provided survey responses with smelters not on the CFSP's active or compliant smelter lists maintained by the Conflict Free Smelter Program (CFSP) or did not provide country of origin information were sent corrective action letters that note that Hasbro prefers to source 3TG from CFSP compliant smelters. In the corrective action letters, Hasbro requested that contract manufacturers that source from non-CFSP compliant smelters conduct their own supply chain due diligence and report the mine and conflict status of conflict minerals contained in the products supplied to Hasbro.
  - As requested by CFSI, Hasbro is contacting the smelters that are not CFSP compliant or actively in communication with the CFSP in order to request that they undergo an independent third party CFSP audit.
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- As member of the CFSI, Hasbro received sourcing information for CFSP compliant smelters. Hasbro conducted research in the public domain in order to identify sourcing information for smelters that are not on the CFSP compliant smelter list, when possible.
- Business Unit representatives located in Asia also conducted outreach to ensure that applicable contract manufacturers updated their responses with accurate and complete information.
- Hasbro contacted all applicable contract manufacturers who identified smelters that were not designated as conflict free to determine if they had any additional information regarding country of origin of the conflict minerals and to remind them of the responsible sourcing policy.
- Through Hasbro's membership in the Toy Industry Association (TIA), Hasbro became a member of a consortium comprised of various trade industry associations to keep abreast of prevailing information regarding conflict minerals sourcing and the latest issues facing the industry.

#### **Carry out independent third-party audit of smelter/refiner due diligence practices**

- Hasbro is a downstream consumer of necessary conflict minerals and is many steps removed from smelters and refiners who provide minerals and ores. Hasbro does not purchase raw minerals or ores, and does not, to the best of its knowledge, directly purchase 3TG from any of the Covered Countries. Therefore, Hasbro does not perform or direct audits of smelters and refiners within the supply chain, but rather as a member of the CFSI we rely on the audits carried out by that organization.

#### **Report annually on supply chain due diligence**

- This report and the associated Form SD are available online at the following internet address <http://csr.hasbro.com/has15-conflict-minerals-report.com>.

#### **Section 4: Determination**

Based on the due diligence described above, Hasbro has concluded that for its products containing necessary conflict minerals, Hasbro is not able to determine if such conflict minerals did or did not originate in the Covered Countries or are from recycled or scrap sources.

Hasbro's product categories that may include products containing 3TG are (1) Boys; (2) Girls; (3) Preschool; and (4) Games:

- **Boys:** Boys products include action figures, vehicles, playsets and role play items. Boys ' franchise brands include the NERF line of sports and action products and TRANSFORMERS action figures and accessories. Our boys ' category also included SUPER SOAKER water blasters, G.I. JOE action figures and accessories and entertainment-based licensed products based on popular movie, television and comic book characters.
  - **Girls:** In our Girls business we offer small dolls and fashion dolls, creative play products, and active role play products. Girls ' franchise brands comprise LITTLEST PET SHOP, MY LITTLE PONY and NERF REBELLE. Other major girls ' brands included FURREAL FRIENDS, BABY ALIVE, EASY BAKE and FURBY.
  - **Pre-school:** Franchise brand offerings in the preschool category included PLAY-DOH and TRANSFORMERS RESCUE BOTS products. Other major preschool brands included PLAYSKOOL.
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- **Games:** Our games category included an assortment of brands delivered on various gaming platforms, including action battling, board, off-the-board, digital, trading card and role-playing games. Franchise brands in Games comprise MAGIC: THE GATHERING and MONOPOLY, and other major game brands included in our Games business are BATTLESHIP, BOP-IT, CANDYLAND, CLUE, CONNECT 4, CRANIUM, DUEL MASTERS, ELEFUN& FRIENDS, GAME OF LIFE, JENGA, OPERATION, RISK, SORRY!, TRIVIAL PURSUIT, TWISTER, and YAHTZEE.

Hasbro does not, to the best of its knowledge, directly purchase 3TG from any of the Covered Countries. As a downstream consumer of 3TG, Hasbro must rely on its contract manufacturers to gather information about smelters and refiners in the supply chain. Hasbro has received responses from 100% of the contract manufacturers it surveyed (the survey included all 50 contract manufacturers identified as being at risk for incorporating 3TG into products supplied to Hasbro). The categories of each of the responses are summarized below:

- Responses from 22 of the contract manufacturers did not provide smelters lists.
  - 20 of the contract manufacturers that did not provide smelter lists were not required to provide smelter lists because they stated that the products that they provided to Hasbro in 2015 did not contain 3TG.
  - The remaining two contract manufacturers did not provide a smelter lists because they had not yet received smelter information from their suppliers.
- The responses from 28 of the contract manufacturers surveyed included a list of smelters used by such parties.
  - Of the 28 respondents that included smelter lists, eleven indicated potential sourcing of conflict minerals from the Covered Countries.

All eleven of those contract manufacturers disclosed a smelter list and all but one of the contract manufacturers included smelters that are not currently designated as compliant by the CFSP.

We note that for 2015, 83 percent of the smelter names submitted by our applicable contract manufacturers are on the CFSP's compliant list, as compared to 69 percent in the 2014 compliance year. We believe this improvement is due in part to our efforts to encourage use of CFSP certified smelters by our contract manufacturers.

However, we are currently unable to determine the specific mine location, the country of origin or the conflict status of the 3TG used in our products for the conflict minerals processed in non-CFSP listed smelters. Hasbro sent corrective action letters requesting that contract manufacturers that source from non-CFSP compliant smelters conduct their own supply chain due diligence and report the mine and conflict status of conflict minerals contained in the products supplied to Hasbro. Hasbro's corrective action letters noted that Hasbro prefers to source 3TG from smelters compliant with the CFSP. Hasbro performed research in the public domain and in the CFSI's smelter database. We informed our executive steering committee of the results of due diligence and have determined that further outreach and research are required in future compliance years in order to determine the country of origin and conflict status of the 3TG processed by smelters that are not compliant with the CFSP. We are in the process of putting these additional measures in place.

The responding contract manufacturers declared a total of 59 unique smelter names as the source of 3TG. Of the 59 declared smelters, 49 have been designated as conflict free under the CFSP, and an additional 2 smelters are actively pursuing such designation at this time. The remaining 8 smelters on the list of declared smelters that were indicated as potentially the source of 3TG are not currently CFSP compliant or actively pursuing such designation. The source of conflict minerals from those smelters is undetermined at this time and we are not able to determine currently whether 3TG from any of those smelters were used in our products. Set forth in Annex 1 is a list of the 59 unique smelter names disclosed to us by contract manufacturers broken down into those that are currently CFSP compliant, those actively seeking such designation at this time, and other smelters. Hasbro has disclosed the list of applicable smelters reported to us by our contract manufacturers as Annex 1 to this report. Based on the information provided by Hasbro's contract manufacturers, from the CFSI and other sources, Hasbro believes that the countries of origin of the 3TG contained in our products may include the countries listed in Annex 2 below, as well as recycled and scrap sources.

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The Hasbro sourcing model is designed to provide Hasbro flexibility to move production of products among contract manufacturers based on contract manufacturer capacities and product demand. Consequently, there may be instances where the same Hasbro branded product is manufactured by multiple contract manufacturers, which increases the complexity in linking a product with specific smelters. With the level of information Hasbro has received from its contract manufacturers and its current technology infrastructure, Hasbro has made progress from 2014 in its ability to begin connecting specific smelters or refiners to our contract manufacturers for Hasbro product categories for the 2015 reporting year, but at this time Hasbro has not been able to determine the country of origin for the 3TG minerals in our product categories.

#### **Section 5: Independent audit**

Hasbro has determined that for 2015 an independent private sector audit is not required.

#### **Section 6: Continuous Improvement efforts to mitigate risk**

Hasbro has taken the following steps to improve the number and quality of responses in the 2015 compliance period and to mitigate risk that the necessary conflict minerals used in Hasbro products may finance or benefit armed groups in the Covered Countries:

- Hasbro's Executive Vice President, Chief Global Operations and Business Development Officer issued a response request letter to all contract manufacturers who were non-responsive or who submitted responses that were incomplete in the 2014 reporting year survey.
- In part due to contract manufacturers' outreach from the Executive Vice President, Chief Global Operations and Business Development Officer, Hasbro achieved a 100% response rate from all applicable contract manufacturers, as compared to an 88% response rate in 2014.
- Updated our conflict minerals policy in 2015 to reinforce our commitment to the ultimate goal that any conflict minerals included in our products are sourced from smelters identified as conflict free or are otherwise subject to contract manufacturer diligence sufficient to determine that such minerals are not being used to fund armed conflict in the DRC and its adjoining countries.
- Continued to use contract terms and conditions for new contracts requiring contract manufacturers to respond to inquiries regarding conflict minerals in a timely manner through incorporation of conflict minerals requirements into Hasbro's Vendor Manual, which is incorporated into Hasbro's Master Agreements with contract manufacturers.
- Increased our ability to link specific contract manufacturers to particular smelters and product categories through surveying all applicable contract manufacturers at the product-level in 2015 and through requiring contract manufacturers to provide country of origin information as part of Hasbro's efforts to identify the source of Hasbro's conflict minerals
- Worked with contract manufacturers to help them understand the importance of this initiative to Hasbro and to encourage their participation in the conflict minerals survey through trainings for relevant contract manufacturers. Since most of our contract manufactures are based in the People's Republic of China, Hasbro conducted an in-person training session with our Chinese contract manufacturers.
- Encouraged contract manufacturers to source from smelters that have received the conflict free designation or that are otherwise subject to adequate due diligence to ensure such minerals are not being used to fund conflict. In 2015, 83 percent of the smelters reported by applicable contract manufacturers are on the CFSP's compliant list, as compared to 69 percent in the 2014 compliance year.
- Is communicating with smelters reported by Hasbro's applicable contract manufacturers that are not currently CFSP compliant or actively in communication with the CFSP to ask that they undergo the CFSP audit process.

In the next compliance period, Hasbro intends to take the following steps to improve the number and quality of contract manufacturer responses and to mitigate the risk that the necessary conflict minerals used in Hasbro products may finance or benefit armed groups in the Covered Countries:

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- Continue to use contract terms and conditions for new contracts requiring contract manufacturers to respond to inquiries regarding conflict minerals in a timely manner.
- Continue engaging non-compliant contract manufacturers from 2015 into the 2016 reporting period, with the objective of maintaining a 100% response rate from all applicable contract manufacturers and obtaining complete lists and the ability to link specific contract manufacturers to particular smelters and to particular product categories.
- Continue to work with contract manufacturers to identify to the extent possible the source of conflict minerals used in Hasbro's products.
- Build capabilities with active and new contract manufacturers by helping them understand the importance of this initiative to Hasbro and to encourage their participation in 2016 through contract manufacturer trainings.
- Encourage contract manufacturers to source from smelters that have received the conflict free designation or that are otherwise subject to adequate due diligence to ensure such minerals are not being used to fund armed conflict in the Covered Countries.
- Continue working with our contract manufacturers to better understand how individual sources of conflict minerals may apply to our individual product categories.

Certain statements in this Conflict Minerals Report contain "forward-looking statements" within the meaning of the Private Securities Litigation Reform Act of 1995. These forward-looking statements include expectations concerning the Company's future actions to engage contract manufacturers, to identify to the extent possible the source of 3TG minerals in its products and to take other actions regarding its product sourcing. The Company's actual actions or results may differ materially from those expected or anticipated in the forward-looking statements due to both known and unknown risks and uncertainties including, but not limited to, decisions to make changes in the Company's continual improvement efforts and delays or difficulties in engaging contract manufacturers and identifying the source of 3TG contained in the Company's products.

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Annex 1

**CFSP Compliant Smelters**

| <b>Metal Name</b> | <b>Smelter Name</b>                                 | <b>Smelter Country Name</b> |
|-------------------|---|-----------------------------|
| Gold              | Aida Chemical Industries Co., Ltd.                  | JAPAN                       |
| Gold              | Allgemeine Gold-und Silberscheideanstalt A.G.       | GERMANY                     |
| Gold              | Argor-Heraeus SA                                    | SWITZERLAND                 |
| Gold              | Asahi Refining Canada Limited                       | CANADA                      |
| Gold              | Asahi Refining USA Inc.                             | UNITED STATES               |
| Gold              | Elemetal Refining, LLC                              | UNITED STATES               |
| Gold              | Heraeus Ltd. Hong Kong                              | CHINA                       |
| Gold              | Heraeus Precious Metals GmbH & Co. KG               | GERMANY                     |
| Gold              | Jiangxi Copper Company Limited                      | CHINA                       |
| Gold              | JX Nippon Mining & Metals Co., Ltd.                 | JAPAN                       |
| Gold              | Kennecott Utah Copper LLC                           | UNITED STATES               |
| Gold              | LS-NIKKO Copper Inc.                                | KOREA, REPUBLIC OF          |
| Gold              | Materion  | UNITED STATES               |
| Gold              | Metalor Technologies (Hong Kong) Ltd.               | CHINA                       |
| Gold              | Metalor Technologies SA                             | SWITZERLAND                 |
| Gold              | Metalor USA Refining Corporation                    | UNITED STATES               |
| Gold              | PAMP SA   | SWITZERLAND                 |
| Gold              | Rand Refinery (Pty) Ltd.                            | SOUTH AFRICA                |
| Gold              | Royal Canadian Mint                                 | CANADA                      |
| Gold              | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.   | CHINA                       |
| Gold              | Tanaka Kikinzoku Kogyo K.K.                         | JAPAN                       |
| Gold              | The Refinery of Shandong Gold Mining Co., Ltd.      | CHINA                       |
| Gold              | United Precious Metal Refining, Inc.                | UNITED STATES               |
| Gold              | Valcambi SA   | SWITZERLAND                 |
| Gold              | Western Australian Mint trading as The Perth Mint   | AUSTRALIA                   |
| Gold              | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | CHINA                       |
| Gold              | Zijin Mining Group Co., Ltd. Gold Refinery          | CHINA                       |
| Tin               | Alpha   | UNITED STATES               |
| Tin               | Gejiu Non-Ferrous Metal Processing Co., Ltd.        | CHINA                       |
| Tin               | Malaysia Smelting Corporation (MSC)                 | MALAYSIA                    |
| Tin               | Minsur  | PERU                        |
| Tin               | Mitsubishi Materials Corporation                    | JAPAN                       |
| Tin               | Operaciones Metalurgical S.A.                       | BOLIVIA                     |
| Tin               | PT Bangka Tin Industry                              | INDONESIA                   |
| Tin               | PT Inti Stania Prima                                | INDONESIA                   |
| Tin               | PT Refined Bangka Tin                               | INDONESIA                   |
| Tin               | PT Timah (Persero) Tbk Kundur                       | INDONESIA                   |
| Tin               | PT Timah (Persero) Tbk Mentok                       | INDONESIA                   |
| Tin               | PT Tinindo Inter Nusa                               | INDONESIA                   |
| Tin               | Rui Da Hung   | TAIWAN                      |
| Tin               | Thaisarco   | THAILAND                    |
| Tungsten          | Chongyi Zhangyuan Tungsten Co., Ltd.                | CHINA                       |
| Tungsten          | Fujian Jinxin Tungsten Co., Ltd.                    | CHINA                       |
| Tungsten          | Ganzhou Huaxing Tungsten Products Co., Ltd.         | CHINA                       |
| Tungsten          | Ganzhou Seadragon W & Mo Co., Ltd.                  | CHINA                       |
| Tungsten          | Hunan Chunchang Nonferrous Metals Co., Ltd.         | CHINA                       |
| Tungsten          | Japan New Metals Co., Ltd.                          | CHINA                       |
| Tungsten          | Xiamen Tungsten (H.C.) Co., Ltd.                    | CHINA                       |
| Tungsten          | Xiamen Tungsten Co., Ltd.                           | CHINA                       |

**Smelters Actively Pursuing CFSP Designation**

| <b>Metal Name</b> | <b>Smelter Name</b>                           | <b>Smelter Country Name</b> |
|-------------------|---|-----------------------------|
| Tin               | China Tin Group Co., Ltd.                     | CHINA                       |
| Tin               | Yunnan Chengfeng Non-ferrous Metals Co., Ltd. | CHINA                       |

**All Other Smelters**

| <b>Metal Name</b> | <b>Smelter Name</b>                                     | <b>Smelter Country Name</b> |
|-------------------|---|-----------------------------|
| Gold              | Guangdong Jinding Gold Limited                          | CHINA                       |
| Gold              | Guoda Safina High-Tech Environmental Refinery Co., Ltd. | CHINA                       |
| Gold              | Tongling Nonferrous Metals Group Co., Ltd.              | CHINA                       |
| Gold              | Yunnan Copper Industry Co., Ltd                         | CHINA                       |
| Tin               | PT Bangka Kudai Tin                                     | INDONESIA                   |
| Tin               | Yunnan Tin Group (Holding) Company Limited              | CHINA                       |
| Tungsten          | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.   | CHINA                       |
| Tungsten          | Jiangxi Rare Earth & Rare Metals Tungsten Group Corp.   | CHINA                       |

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Annex 2

**Countries of origin of the conflict minerals these facilities may process include:**

Angola, Argentina, Australia, Austria, Belgium, Bolivia, Brazil, Burundi, Cambodia, Canada, Central African Republic, Chile, China, Colombia, Côte D'Ivoire, Czech Republic, Djibouti, Ecuador, Egypt, Estonia, Ethiopia, France, Germany, Guyana, Hungary, India, Indonesia, Ireland, Israel, Japan, Kazakhstan, Kenya, Laos, Luxembourg, Madagascar, Malaysia, Mongolia, Mozambique, Myanmar, Namibia, Netherlands, Nigeria, Peru, Portugal, Republic of Congo, Russia, Rwanda, Sierra Leone, Singapore, Slovakia, South Africa, South Korea, South Sudan, Spain, Suriname, Switzerland, Taiwan, Tanzania, Thailand, Uganda, United Kingdom, United States of America, Vietnam, Zambia, Zimbabwe