

**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION**

Washington, D.C. 20549

**FORM SD**

**SPECIALIZED DISCLOSURE REPORT**



**MICROCHIP TECHNOLOGY INCORPORATED**

**(Exact Name Of Registrant As Specified In Its Charter)**

**Delaware**

(State Or Other Jurisdiction Of Incorporation)

**0-21184**

(Commission File No.)

**86-0629024**

(IRS Employer Identification No.)

**2355 West Chandler Boulevard, Chandler, Arizona 85224-6199**

(Address of Principal Executive Offices) (Zip Code)

**J. Eric Bjornholt, Vice President, Chief Financial Officer (480) 792-7200**

(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:

☒ Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2017.

## **Section 1 – Conflict Minerals Disclosures**

### **Item 1.01 and 1.02 Conflict Minerals Disclosure and Report, Exhibit**

Microchip Technology Incorporated's ("Microchip's") Conflict Minerals Report for the reporting period January 1, 2017, through December 31, 2017, is provided as Exhibit 1.01 hereto and is publicly available at [www.microchip.com/doclisting/investorshome.aspx](http://www.microchip.com/doclisting/investorshome.aspx). Microchip's product descriptions, disclosure of countries of origin, statements regarding recycled and scrap sources, and determinations and related disclosures are included in Microchip's Conflict Minerals Report and are incorporated by reference in this Section.

## **Section 2 – Exhibits**

### **Item 2.01 Exhibits**

1.01 [Conflict Minerals Report for the reporting period January 1, 2017, through December 31, 2017](#)

## 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.

Dated: May 23, 2018

Microchip Technology Incorporated

By: /s/ J. Eric Bjornholt

J. Eric Bjornholt

Vice President, Chief Financial Officer

(Principal Accounting and Financial Officer)

## EXHIBITS

| Exhibit No. | Description |
|-------------|-------------|
|-------------|-------------|

|      |   |
|------|---|
| 1.01 | <a href="#"><u>Conflict Minerals Report for the reporting period January 1, 2017, through December 31, 2017</u></a> |
|------|---|

## CONFLICT MINERALS REPORT



## MICROCHIP TECHNOLOGY INCORPORATED

## In Accord with Rule 13p-1 Under the Securities Exchange Act of 1934

This report for the year ended December 31, 2017, is presented to comply with Rule 13p-1 under the Securities Exchange Act of 1934 ("Rule 13p-1"). Rule 13p-1 was adopted by the United States Securities and Exchange Commission ("SEC") to implement reporting and disclosure requirements related to conflict minerals as directed by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 ("Dodd-Frank"). Rule 13p-1 imposes certain reporting obligations on SEC registrants whose products contain conflict minerals necessary to the functionality or production of their products. Conflict Minerals are defined by Rule 13p-1 as gold, and cassiterite, columbite-tantalite, and wolframite, and their derivatives, which are limited to tin, tantalum, and tungsten.

If a registrant has reason to believe that any conflict minerals in their supply chain may have originated in the Democratic Republic of the Congo or an adjoining country ("Covered Countries"), or if they are unable to determine the country of origin of conflict minerals or that their products are manufactured entirely from recycled and scrap sources, then the issuer must exercise due diligence on the source and chain of custody of the conflict minerals. The registrant must annually submit a Conflict Minerals Report ("CMR") to the SEC that includes a description of those due diligence measures. This report is Microchip Technology Incorporated's CMR for the reporting calendar year ended December 31, 2017.

This report is not audited, as Rule 13p-1 and current SEC guidance provide that if the registrant is not declaring products as "DRC Conflict Free," the CMR is not subject to an independent private sector audit ("IPSA").

**1. COMPANY OVERVIEW**

MICROCHIP TECHNOLOGY INCORPORATED develops, manufactures, contracts to manufacture and sells specialized semiconductor products used by its customers in a wide variety of embedded control applications. Microchip Technology Incorporated was incorporated in Delaware in 1989. In this CMR, "we," "us," and "our" each refers to Microchip Technology Incorporated and its subsidiaries ("Microchip"). Our executive offices are located at 2355 West Chandler Boulevard, Chandler, Arizona 85224-6199 and our telephone number is (480) 792-7200.

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Our Internet address is [www.microchip.com](http://www.microchip.com). This CMR will be posted on our website with our other SEC filings under About Us/Investor Relations as soon as reasonably practicable after it is electronically filed with the SEC. All of our SEC filings are available on our website are free of charge. Additionally, this CMR will be posted on our designated Conflict Minerals webpage at the internet address [www.microchip.com/conflictminerals](http://www.microchip.com/conflictminerals). The information on our website is **not** incorporated into this CMR.

## **1.1 Microchip Products**

Our product portfolio is comprised of general purpose and specialized 8-bit, 16-bit, and 32-bit PIC® microcontrollers and 16-bit dsPIC® digital signal controllers, most of which feature on-board Flash (reprogrammable) memory technology. In addition, we design, manufacture, contract to manufacture, and sell a broad spectrum of high-performance linear, mixed-signal, power management, thermal management, RF, safety and security, and interface devices, as well as serial EEPROMs, Serial Flash memories and Parallel Flash memories and serial SRAM memories. We also license Flash-IP solutions that are incorporated in a broad range of products. Our synergistic product portfolio targets thousands of applications worldwide and a growing demand for high-performance designs in the automotive, communications, computing, consumer and industrial control markets.

Microchip's acquisition of Atmel Corporation in 2016 included a portfolio of high reliability R&D application development printed circuit boards and system kits that are subject to United States, French, and European Union export control regulations. Due to the sensitivity of exchanging information concerning these new class of products, Microchip was not able to conduct a full RCOI for this specialized portfolio of development tool boards and kits over the course of 2017, which represent a gap in our process. These products will be included in our 2018 RCOI.

Our strategic focus is on embedded control solutions, including:

1. Microcontrollers
  2. Analog, interface and mixed signal products
  3. Memory products
  4. RF modules and touch screen controller boards
  5. System-in-Package ("SiP") hybrid modules
  6. Development tools
  7. Technology licensing
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A more detailed discussion of our product categories and the products relating to each category for calendar year 2017 are contained in our Annual Reports for fiscal year 2017 (filed on May 30, 2017) and fiscal year 2018 (filed on May 18, 2018).

Microchip product Categories 1, 2, 3, 4, and 5 above are components incorporated into customers' products. Category 6 is research and application development tools used by customers' design engineers to design and test products. Category 7, technology licensing, is not a physical product. Conflict minerals are not relevant to Category 7. All references to products hereafter include Microchip and all subsidiaries' products in Categories 1-6 that were manufactured by Microchip or its subsidiaries, or contracted by Microchip or its subsidiaries to be manufactured, and within the scope of Rule 13p-1 ("Microchip products") unless specifically attributed to Microchip or a specific subsidiary (e.g. "Microchip Category A products" vs. "subsidiary Category A products").

For purposes of conflict minerals activities and reporting, we have categorized Microchip products as:

| <b>Conflict Minerals Disclosure Category</b> | <b>Conflict Minerals Product Description</b>   | <b>Annual Report Product Description</b> |
|--|--|--|
| A  | Integrated circuits including touch screen controller ICs (e.g. PIC®Microcontrollers, dsPIC® Digital Signal Controllers, touch and gesture sensing solutions, analog and interface, RF front-end products, wireless audio, USB and wireless solutions, embedded security products, memory products, medical electronics, LED drivers, printer/EL drivers, telecommunications, general industrial.) | 1, 2 and 3                               |
| B  | RF modules and touch screen controller boards  | 4  |
| C  | System-in-Package (SiP) hybrid modules   | 5  |
| D  | R&D application development printed circuit boards and system kits   | 6  |

We conducted an analysis of Microchip products and found that small quantities of tin, tantalum, tungsten and/or gold ("3TG"), necessary to their functionality or production, are found in substantially all Microchip products (Categories A, B, C, and D).

## **1.2 Conflict Minerals Report**

For all product categories, we have been unable to conclusively determine the origin of the 3TG that our products contain, or to conclusively determine to what extent they come from recycled or scrap sources; the facilities used to process them; their country of origin; or their mine or location of origin. Our suppliers reported at broad levels, often at the company or large product family level. None of our suppliers

identified which entities sourced Microchip products and none of our suppliers reported that all entities identified on their Responsible Minerals Initiative Conflict Minerals Reporting Template ("RMI-CMRT")<sup>1</sup> sourced Microchip products. This report describes our Reasonable Country of Origin Inquiry ("RCOI") for context, the due diligence measures we took on the 3TG source and chain of custody, a description of the products manufactured or contracted to be manufactured for which we controlled the design and specified or approved the utilized materials, the results of our due diligence efforts, and expected risk assessment and mitigation steps.

### **1.3 Supply Chain**

#### **Microchip Products**

It was only practicable to conduct and complete an RCOI of all (100%) of our suppliers for Category A products in the reporting period ended December 31, 2017. In calendar year 2017, Microchip began a new RCOI for Category B, Category C, and Category D products. Microchip focused on the highest volume, highest revenue products representing greater than 90% of Microchip revenue in fiscal year 2017, Category A, Integrated Circuits.

Microchip Technology acquired Supertex, Inc. in April 2014, Micrel, Inc. in August 2015, and Atmel Corporation in April 2016. All Category A products for these business acquisitions were included in the 2017 RCOI.

##### **1.3.1 Category A – Integrated Circuits**

Integrated circuits are manufactured and assembled by Microchip and contract manufacturers, and the first-tier supply chain to Microchip is best illustrated by three categories: (1) raw material suppliers; (2) silicon foundries; and (3) assembly subcontractors. Raw material suppliers support Microchip's two primary manufacturing sites where Microchip manufactures integrated circuits on raw silicon and our backend assembly sites.

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<sup>1</sup> As of December 1, 2017, the Conflict-Free Sourcing Initiative (CFSI) is now recognized as the Responsible Minerals Initiative (RMI). Additionally, as of October 18th, 2017 the Conflict-Free Smelter Program (CFSP) is now known as Responsible Minerals Assurance Process (RMAP). These actions by the RMI were taken after the completion of Microchip's RCOI. Given this, we will refer to the CFSI and CFSP as they are currently named RMI, and RMAP respectively throughout this report.

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### **1.3.2 Categories B, C, and D -- RF Modules, Touch Screen Controller Boards, SiP Hybrid Modules, and R&D Application Development Printed Circuit Boards and System Kits**

RF modules, touch screen controller boards, SiP hybrid modules, and R&D application development tools are assembled by Microchip and contract manufactures. For Category B, Category C, and Category D products assembled by contract manufacturers, Microchip's design engineers specify the type and manufacturer of each discrete component – resistors, diodes, crystal oscillators, inductors, and capacitors are examples of discrete components mounted on Category B, Category C, and Category D substrates but are not manufactured by Microchip. The contract manufacturers order the components, bare printed circuit boards or substrates, where applicable, and materials used in these products from their lower tier suppliers. Microchip does not have visibility or expertise to know if 3TG is necessary for functionality or production of all of the materials, components, and peripheral equipment that make up the components on Category B, Category C, and Category D products. The contract manufacturers may not have that visibility either. Many suppliers to the contract manufacturers, in turn, have suppliers. Transparency throughout the supply chain is challenging and takes time. We refined our list of verified suppliers to 265 suppliers and more than 10,000 individual component part numbers. We found many different methods by which Microchip's internal product design groups produced bills of materials for the contract manufacturers to use. We recognized the presence of obvious, functional 3TG - tantalum in tantalum capacitors, gold on RF impedance-constrained circuit boards and certain connectors, tin used to mount components to circuit boards, as examples. However, understanding where or if other 3TG were present, and whether they were functional, was challenging. We expect our contract manufacturers to provide information on the origin of the 3TG contained in materials chosen and purchased directly by the contract manufacturers (e.g., tin solder and bare circuit boards). Microchip asked those same contract manufacturers to provide information on the origin of any 3TG contained in other materials, discrete components, and peripheral equipment that make up Category B, Category C, and Category D products, but that proved challenging for the contract manufacturers. In order to overcome this challenge Microchip diligently conducted outreach to its Category B, Category C, and Category D supply chains. In our RCOI starting in May 2017 and ending January 2018 for Category B, Category C, and Category D products, we were able to achieve a response rate of 85% from our suppliers overall. This response rate is significantly higher than last year's supplier response rate as we were able to gain a greater insight into our supply chain allowing for the removal of suppliers that should have been excluded from our RCOI. We are still in the process of including all of the suppliers that came with our acquisition of Atmel. Continued growth and influence of conflict minerals programs around the world, and Microchip's diligent work during our annual RCOI will yield greater supply chain transparency over time. Microchip still has many of the same hurdles that we encountered in our

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2013/2014 RCOI, but we are confident that in the future we will be able to obtain an increased response rate from our suppliers in our Category B, Category C, and Category D supply chains.

#### 1.4 Conflict Minerals Policy

Microchip has adopted a conflict minerals policy. Our publicly available policy is on our company website at [www.microchip.com](http://www.microchip.com). Our policy in effect on the date of this filing appears below in italics.

*Microchip Technology Incorporated and all related subsidiaries (collectively, "Microchip") join many others who are deeply concerned regarding the human tragedies occurring in the Democratic Republic of the Congo and adjoining countries ("Covered Countries") associated, in part, with the mining of columbite-tantalite (tantalum), cassiterite (tin), wolframite (tungsten) and gold ("Conflict Minerals" or "3T&G").*

*These minerals originate from various continents, but armed groups engaged in, or interfering with, mining operations within the Covered Countries are believed to subject workers and indigenous people to serious human rights abuses and are using proceeds from the sale of these Conflict Minerals to finance and sustain regional conflicts. Microchip supports responsible minerals sourcing within the Covered Countries to encourage viable and ethical revenue streams for the local communities. We recognize and support the need to develop programs which allow for improved transparency in 3T&G mining and transport of Conflict Minerals and improved traceability within the 3T&G supply chain.*

*Microchip, its executive management and its business groups, take corporate governance and business ethics seriously. Tantalum, tin, tungsten, and gold are used in electronics products, including products manufactured by Microchip.*

*Microchip is diligently working toward a goal of assuring our products are manufactured and are sourced from socially responsible supply chains. In pursuit of that goal Microchip is doing the following:*

- Participating as a member of the Responsible Minerals Initiative ("RMI") that engages Smelters and Refiners ("SOR") and conducts audits of the SOR against responsible minerals sourcing protocols. The RMI maintains lists of SOR that have successfully completed responsible minerals sourcing audits (including audits by similar industry-specific trade organizations) or are actively participating with the RMI or similar organization ("Conformant" and "active" smelter lists, respectively), and the RMI publishes the industry-standard Conflict Minerals Reporting Template for conducting a Reasonable Country of Origin Inquiry ("RCOI").*
  - Conducting annual RCOI and subsequent smelter sourcing due diligence required by the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act ("Dodd-Frank"). Microchip uses the Responsible Minerals Initiative's Conflict Minerals Reporting Template ("CMRT") for our RCOI.*
  - Retaining professional third-party smelter sourcing due diligence.*
  - Presenting mineral sourcing risks to Microchip's senior management.*
  - Disallowing SOR into our integrated circuit supply chain that are not cooperating with, or that are no longer cooperating with, the RMI's Responsible Minerals Assurance Process or similar mineral sourcing audit programs.*
  - Providing information to suppliers and expecting each to source materials from socially responsible supply chains and to accurately and comprehensively disclose their list of SOR, either at company level or specific to those materials incorporated into Microchip's products.*
  - Publicly disclosing our conflict minerals policy, RCOI implementation procedures, and SOR sourcing due diligence procedures.*
  - As responsible minerals sourcing audit programs mature, and the pool of SOR recognized RMI "Conformant" increases and becomes more viable, we will expand our expectation that our suppliers source 3T&G from SOR that are recognized RMI "Conformant."*
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- *Microchip engages “active” SOR encouraging timely completion of third-party responsible minerals sourcing audits.*
- *Include a conflict minerals flow-down clause in new and renewed supplier contracts and purchase terms and conditions.*

## 2. REASONABLE COUNTRY OF ORIGIN INQUIRY (RCOI)

The difference in product complexity and size of the respective supply chains of our different categories of products necessitated a different RCOI approach for the reporting year.

### 2.1 Category A Products

Beginning in June 2017, Microchip sent the RMI-CMRT with a set of educational and instructional documents, including a list of prohibited smelters, requesting completion of the RMI CMRT to well-defined raw materials suppliers and its contract manufacturers for Category A products.

We reviewed the responses against criteria developed to determine valid responses and to identify candidates for subsequent inquiry ("Response Criteria"). For Microchip Category A inquiries, we received responses that we considered valid, including some requiring subsequent inquiry, from all first-tier suppliers.

**TABLE 1**  
**Category A Products, Smelter Metrics - 209 Total Smelters**

| Metal    | Smelters recognized by the RMI RMAP to be Conformant with their responsible minerals sourcing protocols | Smelters actively participating in sourcing audits by RMI RMAP, TI-CMC, LBMA, or similar | Smelters known to source from the Covered Countries or for which there is reason to believe may source from the Covered Countries | Smelters that use 100% scrap or recycled sources |
|----------|---|--|---|--|
| Tantalum | 33 of 33 <sup>2</sup>   | 0 of 33  | 18 of 33  | 2 of 33  |
| Tin      | 59 of 59 <sup>3</sup>   | 0 of 59  | 2 of 59   | 9 of 59  |
| Tungsten | 32 of 32  | 0 of 32  | 6 of 32   | 0 of 32  |
| Gold     | 85 of 85  | 0 of 85  | 6 of 85   | 24 of 85   |

<sup>2</sup> At the conclusion of Microchip's RCOI Zhuzhou Cemented Carbide Group Co., Ltd. ("Zhuzhou") - CID002232 was a certified RMI Conformant Smelter. However, the RMI subsequently removed Zhuzhou effective September 29, 2017, from its Conformant Smelter List because the entity no longer operates as a smelter meeting the RMI's definition; Zhuzhou operates now only as a trader of RMI Conformant minerals. Due to its new classification Zhuzhou will naturally attenuate out of our integrated circuit supply chain.

<sup>3</sup> At the conclusion of Microchip's RCOI VQB Mineral and Trading Group JSC ("VQB") CID002015 was a certified RMI Conformant Smelter. However, the RMI subsequently removed VQB effective September 29, 2017, from its Conformant Smelter List because the entity no longer operates as a smelter meeting the RMI's definition; VQB now just operates the high purity refinery. As of November 21, 2017, all affected suppliers have removed VQB and are no longer utilized by Microchip.

All smelters for Category A products known to source from the Covered Countries, or for which there is reason to believe may source from the Covered Countries, are recognized as Conformant with RMI Responsible Minerals Assurance Process (RMAP) responsible mineral sourcing protocols and are listed on the RMI's "Conformant" smelter list.

## 2.2 Category B, Category C, and Category D Products

For Category B, Category C, and Category D products, Microchip started an RCOI in May 2017. Having identified and queried the printed circuit board manufacturers and the subcontract manufacturers' unique materials previously, we successfully expanded our inquiry of discrete component manufacturers for all Categories and manufacturers of peripheral equipment included in our Category D application development kits.

**TABLE 2**  
**Category B, Category C, and Category D Products, Smelter Metrics - 310 Total Smelters**

| Metal    | Smelters recognized by the RMI RMAP to be Conformant with their responsible minerals sourcing protocols | Smelters actively participating in sourcing audits by RMI RMAP, TI-CMC, LBMA, or similar | Smelters not actively participating in sourcing audits by RMI RMAP, TI-CMC, LBMA, or similar | Smelters known to source from the Covered Countries or for which there is reason to believe may source from the Covered Countries |
|----------|---|--|--|---|
| Tantalum | 40 of 40  | 0 of 40  | 0 of 40  | 20 of 40  |
| Tin      | 69 of 79  | 4 of 79  | 6 of 79  | 2 of 79   |
| Tungsten | 41 of 46  | 2 of 46  | 3 of 46  | 7 of 46   |
| Gold     | 98 of 145   | 8 of 145   | 39 of 145  | 12 of 145   |

36 of the 41 smelters for Category B, C, and D products are known to source from the Covered Countries, or for which there is a reason to believe may source from the Covered Countries based on business relationships are recognized as Conformant with RMI RMAP responsible minerals sourcing protocols. The remaining five smelters are known to source from the Covered Countries, or for which there is a reason to believe may source from the Covered Countries based on business relationships, are not recognized as Conformant with the RMI RMAP responsible minerals sourcing protocols thus requiring additional due diligence to be conducted. For more information on these five smelters, please go to section 3.3.1 "Category B, Category C, and Category D Identified Risks."

62 of the 310 reported smelters for Category B, Category C, and Category D products (20%) were found to be 100% scrap recyclers.

## 3. DUE DILIGENCE PROCESS

### 3.1 Design of Due Diligence

We made a good faith effort in the reporting year to work within the framework of the Organization for Economic Co-Operation and Development Due Diligence Guidance for Responsible Supply Chains of

## **3.2 Management Systems**

Microchip operates under a set of Guiding Values and a Code of Business Conduct & Ethics that forms the foundation of all management systems at Microchip. Continuing through the reporting year, Microchip expressed its concern and commitment regarding conflict minerals sourcing from the DRC and Covered Countries in a publicly available policy statement on conflict minerals as outlined in Section 1.4 above.

### **3.2.1 Internal Team**

Continuing through the reporting year, Microchip's management system for conflict minerals included a team of corporate representatives from relevant functions, including corporate environmental services, product environmental, supply management, risk management, corporate social responsibility and legal. The team is sponsored by Microchip's CFO, and senior management was briefed about the results of due diligence efforts, including minerals sourcing risks.

The conflict minerals team is responsible for implementing the conflict minerals compliance strategy, including formalizing conflict minerals due diligence practices, developing supplier risk assessment criteria and responses to risk. The team is led by the Sr. Manager of Site Services and Risk Loss who acts as the conflict minerals program manager.

### **3.2.2 Control Systems**

To encourage the establishment of a system of controls and transparency over the mineral supply, we participate in the Electronics Industry Citizenship Coalition-Global e-Sustainability Initiative's (EICC-GeSI)<sup>4</sup> Responsible Minerals Initiative ("RMI"). Participation allows Microchip to promote validation programs, increase our knowledge of smelters and refiners in the supply chain, understand the scope and process for audit and validation program plans for metal-specific trade organizations, gain insight into which smelters are known to source from the covered countries, and join discussions of emerging practical due diligence experiences. During the reporting year, Microchip engaged a third-party due diligence consultant experienced with smelter sourcing research and with a proven record of smelter engagement. The consultant reviewed sorted smelter data obtained from our 2017 RCOI for Category A products and raw, unsorted smelter data from our 2017 RCOI for Category B, Category C, and Category D products, and then prepared a technical file for each.

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<sup>4</sup> As of October 18th, 2017, the Electronics Industry Citizenship Coalition-Global e-Sustainability Initiative (EICC-GeSI) is now the Responsible Business Alliance (RBA). Given this, we will refer to the EICC-GeSI as the (RBA) throughout this report.

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Mineral sourcing risk, including customer perception of sourcing risk, is presented to Microchip's senior management.

### **3.2.3 Supplier Engagement**

Microchip's supplier engagement activities in the reporting year again focused primarily on Microchip Category A suppliers. During the reporting year, we requested completion of the RMI CMRT by raw material suppliers and contract manufacturers of Category A products using an educational request letter that included training materials developed by Microchip, a prohibited smelters list, and referral to training materials developed by and available through the RMI. We reviewed responses against criteria designed to determine the number of valid responses ("Response Criteria"), and we followed up with corrections and clarifications as needed. During the reporting year, all reported smelters for Category A products were found to be listed in the RMI "Conformant" smelter lists. Over the course of the year, the RMI de-listed a number of smelters; additional discussion is presented in Section 3.3, second paragraph, of this CMR.

For Microchip's Category B, Category C, and Category D products Microchip continued and expanded its engagement with the second and third tier discrete component and peripheral equipment suppliers using the RMI CMRT and educational materials. We continue to encounter circumstances where the manufacturer of the discrete component declined to provide a completed CMRT because we are not their direct customer - our contract manufacturers are their direct customer, but the contract manufacturers are not responsible for specifying the discrete components.

### **3.2.4 Grievance Mechanism**

Microchip has grievance mechanisms whereby employees, suppliers, and others can report suspected non-compliance with legal requirements and suspected non-compliance with Microchip's Code of Business Conduct & Ethics.

Our Code of Business Conduct & Ethics policy (HR-690), Compliance with Laws policy

(HR-685) and Reporting Legal Non-Compliance policy (HR-675) include complaint procedures. These policies are publicly available at <http://www.microchip.com/about-us/corporate-responsibility/ethics-conduct>.

### **3.2.5 Maintain Records**

Microchip has developed a process for collecting and retaining RCOI and due diligence documentation that was directed, controlled, and archived by the conflict minerals team.

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### **3.3 Identify and Assess Risk in the Supply Chain**

Because of our size, the complexity of our products, and the depth, breadth, and evolution of our supply chain, it can be challenging to identify suppliers upstream from our first tier (direct) suppliers. Accordingly, we identify direct suppliers that supply products to us that may contain conflict minerals. We pursue smelter identification using the RMI CMRT; additionally, Microchip leverages our membership in the RMI as an integral part of our supply chain identification and due diligence and risk assessment processes.

During 2017, the RMI removed numerous smelters from their “Conformant” smelter list. Most of these smelters had ceased operations, at least temporarily, or were reclassified as non-smelters by the RMI. A majority of these smelters were RMI “Conformant” before leaving the market, and our third party due diligence indicated no risk of irresponsible sourcing within the Covered Countries. Microchip did not need to take removal action against these smelters as all would naturally attenuate out of our Category A products’ supply chain during our 2017 RCOI. However, in 2017 Microchip did pursue removal action against one formerly RMI-Conformant smelter reported to be in Microchip’s Category A products’ supply chain when they were reclassified as non-smelter by the RMI in accordance with their definitions and, upon scrutiny of the new entity’s high-purity refining business model, were found to refine smelted product from both RMI-Conformant smelters and from smelters that were unlisted by the RMI RMAP. Perceiving risk in uncertainty, Microchip promptly removed the formerly RMI-Conformant smelter from its Category A supply chain. All RMI-delisted smelters were added to Microchip’s Prohibited Smelter List which we provide to all suppliers during our annual RCOIs.

#### **3.3.1 Category B, Category C, and Category D Identified Risks**

Sudan Gold Refining (CID002567), a state-owned gold refinery, was reported for the second time this year in our Category B, Category C, and Category D products’ supply chain by a small number of suppliers. This smelter may present a risk of irresponsible sourcing within the Covered Countries. As such Microchip promptly engaged its Category B, Category C, and Category D supply chain to remove this smelter. Most suppliers voluntarily removed Sudan Gold Refining from their supply chain and provided validation in the form of a revised CMRT; however, one supplier did not comply with our multiple requests for the removal of this smelter. In order to remove this smelter and begin risk mitigation Microchip decided to begin the process of disengaging with the non-cooperating component manufacturer as mitigation appeared not feasible or unacceptable.

Universal Precious Metals Refining Zambia (CID002854), a gold refinery, was reported for the first time this year in our Category B, Category C, and Category D products’ supply chain by a small number of suppliers. This smelter presents a risk of irresponsible sourcing within the

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Covered Countries as it is located in the Great Lakes region. Microchip promptly engaged its Category B, Category C, and Category D supply chain to remove this smelter. Most suppliers voluntarily removed them from their supply chain and provided validation in the form of a revised CMRT. However, one supplier did not comply with our multiple requests for the removal of this smelter. In order to remove this smelter and begin risk mitigation Microchip decided to begin the process of disengaging with the non-cooperating component manufacturer as mitigation appeared not feasible or unacceptable.

Kaloti Precious Metals (CID002563), a gold smelter, was reported for the second time this year in our Category B, Category C, and Category D products' supply chain by a small number of suppliers. It has come to our attention during our third party due diligence review that there is a reason to believe that this smelter may present a risk of irresponsible sourcing within the Covered Countries as this smelter is located in a country without a domestic source of gold. However, our third-party due diligence provider confirmed directly with Kaloti that they source 80% from recycled material and 20% from the West Africa and South America regions. Additionally, Kaloti Precious Metals is currently under an RMI Due Diligence Review. Most suppliers voluntarily removed them from their supply chain and provided validation in the form of a revised CMRT; however, two suppliers have yet to comply with our request for the removal this smelter at this time. Microchip continues to press these two suppliers to remove this smelter and may replace the non-cooperating component manufacturers.

Fidelity Printers and Refiners Ltd. (CID002515), a gold refinery, was reported for the second time this year in our Category B, Category C, and Category D supply chain by a small number of suppliers. This smelter may present a risk of irresponsible sourcing within the Covered Countries. As such Microchip promptly engaged its Category B, Category C, and Category D supply chain to remove this smelter. Most suppliers voluntarily removed Fidelity Printers and Refiners Ltd. from their supply chain and provided validation in the form of a revised CMRT; however, one supplier that appears to use this smelter is still verifying whether Fidelity Printers and Refiners Ltd. is actually in their supply chain. This supplier's supply chain is complex, and it may take some time to verify the exact status of this smelter within their supply chain.

Tony Goetz NV (CID002587), a gold refinery, was reported for the second time this year in our Category B, Category C, and Category D products' supply chain by a small number of suppliers. During our third party due diligence it has been found that this smelter may present a risk of irresponsible sourcing within the Covered Countries. On 11/15/2017 the RMAP Audit Status for Tony Goetz changed from Active to Non-Conformant by the decision of RMI Audit Review Committee. As a result, Microchip promptly engaged its Category B, Category C, and Category D supply chain to remove this smelter. Most suppliers voluntarily removed them from their supply chain and provided validation in the form of a revised CMRT; however, two suppliers refuse to

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remove this smelter at this time. Microchip continues to press these two suppliers to remove this smelter and may replace the non-cooperating component manufacturers.

### **3.4 Design and Implement a Strategy to Respond to Risks**

We believe that understanding smelter sourcing practices is the best method that can eventually lead to a determination of a product's conflict status. To that end, Microchip is a member of the RMI. We review the lists of smelters reported by our supply chain against the RMI RMAP "Conformant" smelter lists, their "active" smelter lists, the TI-CMC "active" smelter list (TI-CMC Category A, Members Progressing Toward RMAP Validation), and the KUMA "active" smelter list (KUMA, Members Progressing Toward RMAP Validation). We plan to engage with any of our suppliers whom we have reason to believe are supplying us with 3TG from sources that support conflict in the Covered Countries to seek to establish an acceptable alternative source of 3TG that does not support such conflict. We also encourage smelters reported by our supply chain and for which we can locate viable contact information to voluntarily participate in the RMI RMAP or similar sourcing audit programs leading to recognition by the RMI RMAP as Conformant with the organization's responsible minerals sourcing protocols.

### **3.5 Carry Out Independent Third Party Audit of Supply Chain Due Diligence at Identified Points in the Supply Chain**

We do not typically have a direct relationship with 3TG smelters and refiners and do not perform direct audits of these entities within our supply chain. Microchip does, however, leverage our third party due diligence consultant as a way to contact smelters and refiners that we do not have direct relationships with or do not have the ability to contact. Using our third-party due diligence consultant Microchip is able to gain more information about SOR's sourcing practices, and their internal due diligence procedures. Microchip's consultant also encourages non-conformant SORs to become conformant by joining the RMI or affiliated groups on our behalf. During the reporting year, Microchip purchased gold bond wire directly from one large refiner, gold sputter targets from one large refiner, and Tin Anode from one large refiner, all of which are recognized by the RMI RMAP as Conformant with the organization's responsible minerals sourcing protocols. We support responsible minerals sourcing audits through membership with the RMI.

### **3.6 Report on Supply Chain Due Diligence**

In addition to this CMR, we communicate our conflict minerals activities in our annual Sustainability Report and in our conflict minerals sourcing policy. All are available on our company website at [www.microchip.com](http://www.microchip.com). The information on our website is **not** incorporated into this CMR.

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## **4. DUE DILIGENCE RESULTS**

### **4.1 Request Information**

We conducted a Reasonable Country of Origin Inquiry (“RCOI”) of those suppliers described above using the RMI CMRT. The RMI CMRT was developed to facilitate disclosure and communication of information regarding smelters and refiners that provide 3TG to a company's supply chain.

### **4.2 Summary Results for All Product Categories**

As a result of our continuous due diligence with suppliers and smelters through Microchip’s 3rd party due diligence consultant team, Microchip has determined that approximately 100% of our smelters are RMAP compliant as of the end of our RCOI for our Category A products. These are the same results that we saw at the end of 2016, and an increase of to what we saw at the end of 2015 (98% RMAP compliant smelters).

Microchip’s Category B, Category C, and Category D through the same due diligence processes were able to make considerable strides this year. Microchip has determined that approximately 80% of our smelters reported to us are RMAP compliant as of the end of our RCOI for our Category B, Category C, and Category D products, compared to the 77% we saw at the end of 2016, and the 67% we saw at the end of 2015.

Based on RCOI information provided by suppliers in Microchip's supply chains, our own due diligence efforts, and due diligence provided by our consultant, the facilities that may have processed the 3TG in Microchip's Category A products include those listed in Table 3. Additionally, the facilities that may have processed the 3TG in Microchip's Category B, Category C, and Category D products include those listed in Table 4.

Based on our due diligence efforts, Microchip does not have sufficient information to conclusively determine the countries of origin for the 3TG in our products. Based on information provided by Microchip's suppliers, our due diligence consultant, the RMI and others, Microchip believes that the countries of origin for the 3TG in our products include the countries listed in Table 5.

While we identified 35 smelters for Category A products that use exclusively scrap or recycled sources of 3TG, we determined that no correlation can be made to any specific Microchip Category A product type, technology family, or part number. No Microchip Category A product is made exclusively with 3TG solely sourced from scrap or recycled sources.

While we identified 62 smelters for Category B, Category C, and Category D products that use exclusively scrap or recycled sources of 3TG, we determined that no correlation can be made to any specific Microchip Category B, Category C, and Category D product types, technology families, or part number.

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No Microchip Category B, Category C, and Category D product is made exclusively with 3TG solely sourced from scrap or recycled sources.

Microchip's independent due diligence produced information suggesting 32 reported smelters for Category A products either are known to source from the Covered Countries, or there is reason to believe may or could source from the Covered Countries based upon business relationships. Each of these smelters is recognized by the RMI RMAP to be Conformant with the organization's responsible minerals sourcing protocols and is listed on the RMI RMAP "Conformant" smelter lists.

Microchip's independent due diligence produced information suggesting 41 reported smelters for Category B, Category C, and Category D products either are known to source from the Covered Countries, or there is reason to believe may or could source from the Covered Countries based upon business relationships. 36 of these smelters are recognized by the RMI RMAP to be "Conformant" with the organization's responsible minerals sourcing protocols and are listed on the RMI RMAP "Conformant" smelter lists. For the five smelters reported to be in the supply chain for Category B, Category C, and Category D products that were neither recognized by the RMI RMAP as Conformant with the organization's responsible minerals sourcing protocols and listed on the RMI RMAP "Conformant" smelter lists nor the organization's "active" smelter lists, or the TI-CMC "active" smelter list (TI-CMC Category A Members Progressing Toward RMAP Validation), Microchip performed additional due diligence. The review criteria include a determination of the geographic location, whether there is a known, actively mined, and economically viable reserve of 3TG in the area, whether there is positive evidence of responsible and/or irresponsible sourcing, whether there is contrary evidence of responsible sourcing - all from publicly available sources, the smelters' websites, the UN Group of Experts, NGOs, and the RMI and similar organizations, and from our due diligence consultant's communication with certain smelters. From this due diligence review Microchip concludes:

#### **4.3 Efforts to Determine Mine or Location of Origin**

We have determined that participation in RMI, requesting our suppliers complete the RMI CMRT, and retaining a third-party due diligence consultant in the reporting year are reasonable ways to determine the mines or countries of origin of the 3TG in our supply chain.

#### **4.4 Smelters or Refiners**

Microchip does not source 3TG directly from the Covered Countries, and Microchip typically does not source 3TG directly from smelters or refiners. The exception is gold bond wire, gold sputter targets, and Tin Anode. In this reporting year, Microchip purchased gold bond wire directly from one large refiner, gold sputter targets from one large refiner, and Tin Anode from one large refiner, all of which is recognized by the RMI RMAP as Conformant with the organization's responsible minerals sourcing protocols.

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Based on RCOI information provided by suppliers in Microchip's supply chains, our own due diligence efforts, and due diligence provided by our consultant, the facilities that may have processed the 3TG in Microchip's Category A products include those listed in Table 3,

#### **4.4.2 Category B, Category C, and Category D**

Microchip does not source 3TG directly from the Covered Countries, and Microchip does not source 3TG directly from smelters or refiners for Category B, Category C, and Category D products. The facilities that may have processed the 3TG in Category B, Category C, and Category D products include those listed in Table 4.

### **5. STEPS TO BE TAKEN TO MITIGATE RISK**

We intend to take the following steps to improve the due diligence conducted to further mitigate risk that the necessary conflict minerals in our products could benefit armed groups in the Covered Countries:

- a. Continue to work with the RMI and/or other relevant trade associations to define and improve best practices and build leverage over the supply chain in accordance with the OECD Guidance and/or other SEC recognized framework.
  - b. Consolidate RCOI and due diligence practices and activities into a conflict minerals management system. Continue to retain a third-party due diligence consultant experienced with smelter sourcing research and direct smelter engagement.
  - c. Conduct annual reporting year RCOI for Category A products using the RMI CMRT.
  - d. Conduct annual reporting year RCOI for Category B, Category C, and Category D products using RMI CMRT. Microchip will communicate its expectation that suppliers for Category B, Category C, and Category D products begin to remove uncooperative smelters, and smelters that are not actively participating with the RMI RMAP, or similar sourcing programs from the products they provide to Microchip through Microchip's contract manufacturers.
  - e. Develop supplier engagement strategies that may improve the RCOI response rate for Category B, Category C, and Category D suppliers where Microchip is a second-tier customer or lower.
  - f. Through our efforts or those of our due diligence consultant, engage with selected smelters to encourage participation with the RMI RMAP responsible minerals sourcing audits.
  - g. Continue to remove smelters from our Category A supply chain that become uncooperative with the RMI RMAP, or who were at one time, voluntarily participating with the RMI RMAP responsible minerals sourcing audit program or similar programs but who have fallen off the RMI RMAP "active" smelter lists or their "Conformant" smelter lists unless the RMI places the smelter into its "smelters undergoing extended corrective action" category. Microchip will review the business need for a smelter in this category and may, depending on the cause for
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removal and the nature and content of affirmative commitments made by the affected smelter, choose to retain the smelter in its supply chain.

- h. Engage with direct suppliers found to be supplying us with 3TG from sources that support conflict in any Covered Country to seek to establish an acceptable alternative source of 3TG.
  - i. As validation programs mature, and the pool of validated RMI RMAP “Conformant” smelters and refiners becomes more viable, expand our expectation that our suppliers source 3TG from smelters and refiners that are recognized by the RMI RMAP to be Conformant with the organizations responsible minerals sourcing protocols and include a conflict minerals flow-down clause in new and renewed supplier contracts.
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TABLE 3

## Category A Products

## Smelters Reported to be in Supply Chain

The RCOI producing this data was completed principally by September 9, 2017. 100% of supply chain reported.

| <b>Metal</b> | <b>Standard Smelter Name</b>  | <b>Smelter Country</b>   |
|--------------|---|--------------------------|
| Gold         | JX Nippon Mining & Metals Co., Ltd.   | JAPAN                    |
| Gold         | Kazzinc   | KAZAKHSTAN               |
| Gold         | Kennecott Utah Copper LLC   | UNITED STATES OF AMERICA |
| Gold         | Kojima Chemicals Co., Ltd.  | JAPAN                    |
| Gold         | Kyrgyzaltyn JSC   | KYRGYZSTAN               |
| Gold         | LS-NIKKO Copper Inc.  | KOREA, REPUBLIC OF       |
| Gold         | Materion  | UNITED STATES OF AMERICA |
| Gold         | Matsuda Sangyo Co., Ltd.  | JAPAN                    |
| Gold         | Metalor Technologies (Hong Kong) Ltd.                                       | CHINA                    |
| Gold         | Metalor Technologies (Singapore) Pte., Ltd.                                 | SINGAPORE                |
| Gold         | Metalor Technologies (Suzhou) Ltd.  | CHINA                    |
| Gold         | Metalor Technologies S.A.   | SWITZERLAND              |
| Gold         | Metalor USA Refining Corporation  | UNITED STATES OF AMERICA |
| Gold         | Metallurgica Met-Mex Penoles S.A. De C.V.                                   | MEXICO                   |
| Gold         | Mitsubishi Materials Corporation  | JAPAN                    |
| Gold         | Mitsui Mining and Smelting Co., Ltd.  | JAPAN                    |
| Gold         | MMTC-PAMP India Pvt., Ltd.  | INDIA                    |
| Gold         | Moscow Special Alloys Processing Plant                                      | RUSSIAN FEDERATION       |
| Gold         | Nadir Metal Rafineri San. Ve Tic. A.S.                                      | TURKEY                   |
| Gold         | Nihon Material Co., Ltd.  | JAPAN                    |
| Gold         | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH                 | AUSTRIA                  |
| Gold         | Ohura Precious Metal Industry Co., Ltd.                                     | JAPAN                    |
| Gold         | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | RUSSIAN FEDERATION       |
| Gold         | OJSC Novosibirsk Refinery   | RUSSIAN FEDERATION       |
| Gold         | PAMP S.A.   | SWITZERLAND              |
| Gold         | Prioksky Plant of Non-Ferrous Metals  | RUSSIAN FEDERATION       |
| Gold         | PT Aneka Tambang (Persero) Tbk  | INDONESIA                |
| Gold         | PX Precinox S.A.  | SWITZERLAND              |
| Gold         | Rand Refinery (Pty) Ltd.  | SOUTH AFRICA             |
| Gold         | Republic Metals Corporation   | UNITED STATES OF AMERICA |
| Gold         | Royal Canadian Mint   | CANADA                   |
| Gold         | Samduck Precious Metals   | KOREA, REPUBLIC OF       |
| Gold         | Schone Edelmetaal B.V.  | NETHERLANDS              |
| Gold         | SEMPA Joyeria Plateria S.A.   | SPAIN                    |
| Gold         | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.                           | CHINA                    |
| Gold         | Sichuan Tianze Precious Metals Co., Ltd.                                    | CHINA                    |

| <b>Metal</b> | <b>Standard Smelter Name</b>                         | <b>Smelter Country</b>    |
|--------------|--|---------------------------|
| Gold         | Singway Technology Co., Ltd.                         | TAIWAN, PROVINCE OF CHINA |
| Gold         | SOE Shyolkovsky Factory of Secondary Precious Metals | RUSSIAN FEDERATION        |
| Gold         | Solar Applied Materials Technology Corp.             | TAIWAN, PROVINCE OF CHINA |
| Gold         | Sumitomo Metal Mining Co., Ltd.                      | JAPAN                     |
| Gold         | T.C.A S.p.A  | ITALY                     |
| Gold         | Tanaka Kikinzoku Kogyo K.K.                          | JAPAN                     |
| Gold         | The Refinery of Shandong Gold Mining Co., Ltd.       | CHINA                     |
| Gold         | Tokuriki Honten Co., Ltd.                            | JAPAN                     |
| Gold         | Torecom  | KOREA, REPUBLIC OF        |
| Gold         | Umicore Brasil Ltda.                                 | BRAZIL                    |
| Gold         | Umicore Precious Metals Thailand                     | THAILAND                  |
| Gold         | Umicore S.A. Business Unit Precious Metals Refining  | BELGIUM                   |
| Gold         | United Precious Metal Refining, Inc.                 | UNITED STATES OF AMERICA  |
| Gold         | Valcambi S.A.  | SWITZERLAND               |
| Gold         | Western Australian Mint (T/a The Perth Mint)         | AUSTRALIA                 |
| Gold         | Yamamoto Precious Metal Co., Ltd.                    | JAPAN                     |
| Gold         | Yokohama Metal Co., Ltd.                             | JAPAN                     |
| Gold         | Zhongyuan Gold Smelter of Zhongjin Gold Corporation  | CHINA                     |
| Tantalum     | Changsha South Tantalum Niobium Co., Ltd.            | CHINA                     |
| Tantalum     | Conghua Tantalum and Niobium Smeltry                 | CHINA                     |
| Tantalum     | D Block Metals, LLC                                  | UNITED STATES OF AMERICA  |
| Tantalum     | Exotech Inc.   | UNITED STATES OF AMERICA  |
| Tantalum     | F&X Electro-Materials Ltd.                           | CHINA                     |
| Tantalum     | FIR Metals & Resource Ltd.                           | CHINA                     |
| Tantalum     | Global Advanced Metals Aizu                          | JAPAN                     |
| Tantalum     | Global Advanced Metals Boyertown                     | UNITED STATES OF AMERICA  |
| Tantalum     | Guangdong Zhiyuan New Material Co., Ltd.             | CHINA                     |
| Tantalum     | H.C. Starck Co., Ltd.                                | THAILAND                  |
| Tantalum     | H.C. Starck Hermsdorf GmbH                           | GERMANY                   |
| Tantalum     | H.C. Starck Inc.                                     | UNITED STATES OF AMERICA  |
| Tantalum     | H.C. Starck Ltd.                                     | JAPAN                     |
| Tantalum     | H.C. Starck Smelting GmbH & Co. KG                   | GERMANY                   |
| Tantalum     | H.C. Starck Tantalum and Niobium GmbH                | GERMANY                   |
| Tantalum     | Hengyang King Xing Lifeng New Materials Co., Ltd.    | CHINA                     |
| Tantalum     | JiuJiang JinXin Nonferrous Metals Co., Ltd.          | CHINA                     |
| Tantalum     | Jiujiang Nonferrous Metals Smelting Company Limited  | CHINA                     |
| Tantalum     | KEMET Blue Metals                                    | MEXICO                    |
| Tantalum     | KEMET Blue Powder                                    | UNITED STATES OF AMERICA  |
| Tantalum     | LSM Brasil S.A.                                      | BRAZIL                    |
| Tantalum     | Metallurgical Products India Pvt., Ltd.              | INDIA                     |
| Tantalum     | Mineracao Taboca S.A.                                | BRAZIL                    |
| Tantalum     | Mitsui Mining and Smelting Co., Ltd.                 | JAPAN                     |
| Tantalum     | Ningxia Orient Tantalum Industry Co., Ltd.           | CHINA                     |
| Tantalum     | NPM Silmet AS  | ESTONIA                   |

| <b>Metal</b> | <b>Standard Smelter Name</b>                 | <b>Smelter Country</b>                     |
|--------------|--|--|
| Tantalum     | Power Resources Ltd.                         | MACEDONIA, THE FORMER YUGOSLAV REPUBLIC OF |
| Tantalum     | Solikamsk Magnesium Works OAO                | RUSSIAN FEDERATION                         |
| Tantalum     | Taki Chemical Co., Ltd.                      | JAPAN                                      |
| Tantalum     | Telex Metals                                 | UNITED STATES OF AMERICA                   |
| Tantalum     | Ulba Metallurgical Plant JSC                 | KAZAKHSTAN                                 |
| Tantalum     | Yichun Jin Yang Rare Metal Co., Ltd.         | CHINA                                      |
| Tantalum     | Zhuzhou Cemented Carbide Group Co., Ltd.     | CHINA                                      |
| Tin          | Alpha  | UNITED STATES OF AMERICA                   |
| Tin          | China Tin Group Co., Ltd.                    | CHINA                                      |
| Tin          | CV Ayi Jaya                                  | INDONESIA                                  |
| Tin          | CV Gita Pesona                               | INDONESIA                                  |
| Tin          | CV Serumpun Sebalai                          | INDONESIA                                  |
| Tin          | CV Tiga Sekawan                              | INDONESIA                                  |
| Tin          | CV United Smelting                           | INDONESIA                                  |
| Tin          | CV Venus Inti Perkasa                        | INDONESIA                                  |
| Tin          | Dowa   | JAPAN                                      |
| Tin          | Elmet S.L.U.                                 | SPAIN                                      |
| Tin          | EM Vinto                                     | BOLIVIA (PLURINATIONAL STATE OF)           |
| Tin          | Fenix Metals                                 | POLAND                                     |
| Tin          | Gejiu Jinye Mineral Company                  | CHINA                                      |
| Tin          | Gejiu Non-Ferrous Metal Processing Co., Ltd. | CHINA                                      |
| Tin          | Jiangxi Ketai Advanced Material Co., Ltd.    | CHINA                                      |
| Tin          | Magnu's Minerais Metais e Ligas Ltda.        | BRAZIL                                     |
| Tin          | Malaysia Smelting Corporation (MSC)          | MALAYSIA                                   |
| Tin          | Melt Metais e Ligas S.A.                     | BRAZIL                                     |
| Tin          | Metallic Resources, Inc.                     | UNITED STATES OF AMERICA                   |
| Tin          | Metallo-Chimique N.V.                        | BELGIUM                                    |
| Tin          | Mineracao Taboca S.A.                        | BRAZIL                                     |
| Tin          | Minsur                                       | PERU                                       |
| Tin          | Mitsubishi Materials Corporation             | JAPAN                                      |
| Tin          | O.M. Manufacturing (Thailand) Co., Ltd.      | THAILAND                                   |
| Tin          | O.M. Manufacturing Philippines, Inc.         | PHILIPPINES                                |
| Tin          | Operaciones Metalurgical S.A.                | BOLIVIA (PLURINATIONAL STATE OF)           |
| Tin          | PT Aries Kencana Sejahtera                   | INDONESIA                                  |
| Tin          | PT Artha Cipta Langgeng                      | INDONESIA                                  |
| Tin          | PT ATD Makmur Mandiri Jaya                   | INDONESIA                                  |
| Tin          | PT Babel Inti Perkasa                        | INDONESIA                                  |
| Tin          | PT Bangka Prima Tin                          | INDONESIA                                  |
| Tin          | PT Bangka Tin Industry                       | INDONESIA                                  |
| Tin          | PT Belitung Industri Sejahtera               | INDONESIA                                  |
| Tin          | PT Bukit Timah                               | INDONESIA                                  |
| Tin          | PT DS Jaya Abadi                             | INDONESIA                                  |
| Tin          | PT Eunindo Usaha Mandiri                     | INDONESIA                                  |



| <b>Metal</b> | <b>Standard Smelter Name</b>                                  | <b>Smelter Country</b>    |
|--------------|---|---------------------------|
| Tin          | PT Inti Stania Prima  | INDONESIA                 |
| Tin          | PT Lautan Harmonis Sejahtera                                  | INDONESIA                 |
| Tin          | PT Menara Cipta Mulia   | INDONESIA                 |
| Tin          | PT Mitra Stania Prima   | INDONESIA                 |
| Tin          | PT Panca Mega Persada   | INDONESIA                 |
| Tin          | PT Prima Timah Utama  | INDONESIA                 |
| Tin          | PT Refined Bangka Tin   | INDONESIA                 |
| Tin          | PT Sariwiguna Binasentosa                                     | INDONESIA                 |
| Tin          | PT Stanindo Inti Perkasa                                      | INDONESIA                 |
| Tin          | PT Sukses Inti Makmur   | INDONESIA                 |
| Tin          | PT Sumber Jaya Indah  | INDONESIA                 |
| Tin          | PT Timah (Persero) Tbk Kundur                                 | INDONESIA                 |
| Tin          | PT Timah (Persero) Tbk Mentok                                 | INDONESIA                 |
| Tin          | PT Tinindo Inter Nusa   | INDONESIA                 |
| Tin          | PT Tommy Utama  | INDONESIA                 |
| Tin          | Resind Industria e Comercio Ltda.                             | BRAZIL                    |
| Tin          | Rui Da Hung   | TAIWAN, PROVINCE OF CHINA |
| Tin          | Soft Metais Ltda.   | BRAZIL                    |
| Tin          | Thaisarco   | THAILAND                  |
| Tin          | VQB Mineral and Trading Group JSC                             | VIET NAM                  |
| Tin          | White Solder Metalurgia e Mineracao Ltda.                     | BRAZIL                    |
| Tin          | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.                 | CHINA                     |
| Tin          | Yunnan Tin Company Limited                                    | CHINA                     |
| Tungsten     | A.L.M.T. TUNGSTEN Corp.                                       | JAPAN                     |
| Tungsten     | Chenzhou Diamond Tungsten Products Co., Ltd.                  | CHINA                     |
| Tungsten     | Chongyi Zhangyuan Tungsten Co., Ltd.                          | CHINA                     |
| Tungsten     | Fujian Jinxin Tungsten Co., Ltd.                              | CHINA                     |
| Tungsten     | Ganzhou Huaxing Tungsten Products Co., Ltd.                   | CHINA                     |
| Tungsten     | Ganzhou Jiangwu Ferrotungsten Co., Ltd.                       | CHINA                     |
| Tungsten     | Ganzhou Seadragon W & Mo Co., Ltd.                            | CHINA                     |
| Tungsten     | Global Tungsten & Powders Corp.                               | UNITED STATES OF AMERICA  |
| Tungsten     | Guangdong Xianglu Tungsten Co., Ltd.                          | CHINA                     |
| Tungsten     | H.C. Starck Smelting GmbH & Co. KG                            | GERMANY                   |
| Tungsten     | H.C. Starck Tungsten GmbH                                     | GERMANY                   |
| Tungsten     | Hunan Chenzhou Mining Co., Ltd.                               | CHINA                     |
| Tungsten     | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji               | CHINA                     |
| Tungsten     | Hunan Chunchang Nonferrous Metals Co., Ltd.                   | CHINA                     |
| Tungsten     | Hydrometallurg, JSC   | RUSSIAN FEDERATION        |
| Tungsten     | Japan New Metals Co., Ltd.                                    | JAPAN                     |
| Tungsten     | Jiangwu H.C. Starck Tungsten Products Co., Ltd.               | CHINA                     |
| Tungsten     | Jiangxi Gan Bei Tungsten Co., Ltd.                            | CHINA                     |
| Tungsten     | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | CHINA                     |
| Tungsten     | Jiangxi Xinsheng Tungsten Industry Co., Ltd.                  | CHINA                     |
| Tungsten     | Jiangxi Yaosheng Tungsten Co., Ltd.                           | CHINA                     |
| Tungsten     | Kennametal Fallon   | UNITED STATES OF AMERICA  |

| Metal    | Standard Smelter Name                                     | Smelter Country          |
|----------|---|--------------------------|
| Tungsten | Kennametal Huntsville                                     | UNITED STATES OF AMERICA |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd.                           | CHINA                    |
| Tungsten | Niagara Refining LLC                                      | UNITED STATES OF AMERICA |
| Tungsten | Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC | VIET NAM                 |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd.                       | VIET NAM                 |
| Tungsten | Vietnam Youngsun Tungsten Industry Co., Ltd.              | VIET NAM                 |
| Tungsten | Wolfram Bergbau und Hutten AG                             | AUSTRIA                  |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd.                          | CHINA                    |
| Tungsten | Xiamen Tungsten Co., Ltd.                                 | CHINA                    |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd.                 | CHINA                    |

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TABLE 4

## Category B, Category C, and Category D Products

## Smelters Reported to be in Supply Chain

The RCOI producing this data began May 31, 2017, and continued through January 16, 2018. Approximately 85% of supply chain reported.

| Metal | Standard Smelter Name   | Smelter Country          |
|-------|---|--------------------------|
| Gold  | Abington Reldan Metals, LLC                                   | UNITED STATES OF AMERICA |
| Gold  | Advanced Chemical Company                                     | UNITED STATES OF AMERICA |
| Gold  | Aida Chemical Industries Co., Ltd.                            | JAPAN                    |
| Gold  | Al Etihad Gold LLC  | UNITED ARAB EMIRATES     |
| Gold  | Allgemeine Gold-und Silberscheideanstalt A.G.                 | GERMANY                  |
| Gold  | Almalyk Mining and Metallurgical Complex (AMMC)               | UZBEKISTAN               |
| Gold  | AngloGold Ashanti Corrego do Sitio Mineracao                  | BRAZIL                   |
| Gold  | Argor-Heraeus S.A.  | SWITZERLAND              |
| Gold  | Asahi Pretec Corp.  | JAPAN                    |
| Gold  | Asahi Refining Canada Ltd.                                    | CANADA                   |
| Gold  | Asahi Refining USA Inc.                                       | UNITED STATES OF AMERICA |
| Gold  | Asaka Riken Co., Ltd.   | JAPAN                    |
| Gold  | Atasay Kuyumculuk Sanayi Ve Ticaret A.S.                      | TURKEY                   |
| Gold  | AU Traders and Refiners                                       | SOUTH AFRICA             |
| Gold  | Aurubis AG  | GERMANY                  |
| Gold  | Bangalore Refinery  | INDIA                    |
| Gold  | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | PHILIPPINES              |
| Gold  | Boliden AB  | SWEDEN                   |
| Gold  | C. Hafner GmbH + Co. KG                                       | GERMANY                  |
| Gold  | Caridad   | MEXICO                   |
| Gold  | CCR Refinery - Glencore Canada Corporation                    | CANADA                   |
| Gold  | Cendres + Metaux S.A.   | SWITZERLAND              |
| Gold  | Chimet S.p.A.   | ITALY                    |
| Gold  | Chugai Mining   | JAPAN                    |
| Gold  | Daejin Indus Co., Ltd.  | KOREA, REPUBLIC OF       |
| Gold  | Daye Non-Ferrous Metals Mining Ltd.                           | CHINA                    |
| Gold  | Degussa Sonne / Mond Goldhandel GmbH                          | GERMANY                  |
| Gold  | DODUCO GmbH   | GERMANY                  |
| Gold  | Dowa  | JAPAN                    |
| Gold  | DSC (Do Sung Corporation)                                     | KOREA, REPUBLIC OF       |
| Gold  | Eco-System Recycling Co., Ltd.                                | JAPAN                    |
| Gold  | Emirates Gold DMCC  | UNITED ARAB EMIRATES     |
| Gold  | Fidelity Printers and Refiners Ltd.                           | ZIMBABWE                 |
| Gold  | Geib Refining Corporation                                     | UNITED STATES OF AMERICA |
| Gold  | Gold Refinery of Zijin Mining Group Co., Ltd.                 | CHINA                    |
| Gold  | Great Wall Precious Metals Co., Ltd. of CBPM                  | CHINA                    |
| Gold  | Guangdong Jinding Gold Limited                                | CHINA                    |

| <b>Metal</b> | <b>Standard Smelter Name</b>                                    | <b>Smelter Country</b>   |
|--------------|---|--------------------------|
| Gold         | GCC Gujrat Gold Centre Pvt. Ltd.                                | INDIA                    |
| Gold         | Guoda Safina High-Tech Environmental Refinery Co., Ltd.         | CHINA                    |
| Gold         | Hangzhou Fuchunjiang Smelting Co., Ltd.                         | CHINA                    |
| Gold         | HeeSung Metal Ltd.  | KOREA, REPUBLIC OF       |
| Gold         | Heimerle + Meule GmbH   | GERMANY                  |
| Gold         | Heraeus Metals Hong Kong Ltd.                                   | CHINA                    |
| Gold         | Heraeus Precious Metals GmbH & Co. KG                           | GERMANY                  |
| Gold         | Hunan Chenzhou Mining Co., Ltd.                                 | CHINA                    |
| Gold         | HwaSeong CJ CO., LTD.   | KOREA, REPUBLIC OF       |
| Gold         | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | CHINA                    |
| Gold         | Ishifuku Metal Industry Co., Ltd.                               | JAPAN                    |
| Gold         | Istanbul Gold Refinery  | TURKEY                   |
| Gold         | Italpreziosi  | ITALY                    |
| Gold         | Japan Mint  | JAPAN                    |
| Gold         | Jiangxi Copper Co., Ltd.  | CHINA                    |
| Gold         | JSC Ekaterinburg Non-Ferrous Metal Processing Plant             | RUSSIAN FEDERATION       |
| Gold         | JSC Uralelectromed  | RUSSIAN FEDERATION       |
| Gold         | JX Nippon Mining & Metals Co., Ltd.                             | JAPAN                    |
| Gold         | Kaloti Precious Metals  | UNITED ARAB EMIRATES     |
| Gold         | Kazakhmys Smelting LLC  | KAZAKHSTAN               |
| Gold         | Kazzinc   | KAZAKHSTAN               |
| Gold         | Kennecott Utah Copper LLC                                       | UNITED STATES OF AMERICA |
| Gold         | KGHM Polska Miedz Spolka Akcyjna                                | POLAND                   |
| Gold         | Kojima Chemicals Co., Ltd.                                      | JAPAN                    |
| Gold         | Korea Zinc Co., Ltd.  | KOREA, REPUBLIC OF       |
| Gold         | Kyrgyzaltyn JSC   | KYRGYZSTAN               |
| Gold         | Kyshtym Copper-Electrolytic Plant ZAO                           | RUSSIAN FEDERATION       |
| Gold         | L'azurde Company For Jewelry                                    | SAUDI ARABIA             |
| Gold         | L'Orfebre S.A.  | ANDORRA                  |
| Gold         | Lingbao Gold Co., Ltd.  | CHINA                    |
| Gold         | Lingbao Jinyuan Tonghui Refinery Co., Ltd.                      | CHINA                    |
| Gold         | LS-NIKKO Copper Inc.  | KOREA, REPUBLIC OF       |
| Gold         | Luoyang Zijin Yinhui Gold Refinery Co., Ltd.                    | CHINA                    |
| Gold         | Marsam Metals   | BRAZIL                   |
| Gold         | Materion  | UNITED STATES OF AMERICA |
| Gold         | Matsuda Sangyo Co., Ltd.  | JAPAN                    |
| Gold         | Metalor Technologies (Hong Kong) Ltd.                           | CHINA                    |
| Gold         | Metalor Technologies (Singapore) Pte., Ltd.                     | SINGAPORE                |
| Gold         | Metalor Technologies (Suzhou) Ltd.                              | CHINA                    |
| Gold         | Metalor Technologies S.A.                                       | SWITZERLAND              |
| Gold         | Metalor USA Refining Corporation                                | UNITED STATES OF AMERICA |
| Gold         | Metalurgica Met-Mex Penoles S.A. De C.V.                        | MEXICO                   |
| Gold         | Mitsubishi Materials Corporation                                | JAPAN                    |
| Gold         | Mitsui Mining and Smelting Co., Ltd.                            | JAPAN                    |
| Gold         | MMTC-PAMP India Pvt., Ltd.                                      | INDIA                    |

| <b>Metal</b> | <b>Standard Smelter Name</b>  | <b>Smelter Country</b>    |
|--------------|---|---------------------------|
| Gold         | Modeltech Sdn Bhd   | MALAYSIA                  |
| Gold         | Morris and Watson   | NEW ZEALAND               |
| Gold         | Morris and Watson Gold Coast  | AUSTRALIA                 |
| Gold         | Moscow Special Alloys Processing Plant                                      | RUSSIAN FEDERATION        |
| Gold         | Nadir Metal Rafineri San. Ve Tic. A.S.                                      | TURKEY                    |
| Gold         | Navoi Mining and Metallurgical Combinat                                     | UZBEKISTAN                |
| Gold         | Nihon Material Co., Ltd.  | JAPAN                     |
| Gold         | Ogussa Österreichische Gold- und Silber-Scheideanstalt GmbH                 | AUSTRIA                   |
| Gold         | Ohura Precious Metal Industry Co., Ltd.                                     | JAPAN                     |
| Gold         | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | RUSSIAN FEDERATION        |
| Gold         | OJSC Novosibirsk Refinery   | RUSSIAN FEDERATION        |
| Gold         | PAMP S.A.   | SWITZERLAND               |
| Gold         | Pease & Curren  | UNITED STATES OF AMERICA  |
| Gold         | Penglai Penggang Gold Industry Co., Ltd.                                    | CHINA                     |
| Gold         | Planta Recuperadora de Metales SpA  | CHILE                     |
| Gold         | Prioksky Plant of Non-Ferrous Metals  | RUSSIAN FEDERATION        |
| Gold         | PT Aneka Tambang (Persero) Tbk  | INDONESIA                 |
| Gold         | PX Precinox S.A.  | SWITZERLAND               |
| Gold         | Rand Refinery (Pty) Ltd.  | SOUTH AFRICA              |
| Gold         | Gansu Seemine Material Hi-Tech Co., Ltd.                                    | CHINA                     |
| Gold         | Remondis Argentia B.V.  | NETHERLANDS               |
| Gold         | Republic Metals Corporation   | UNITED STATES OF AMERICA  |
| Gold         | Royal Canadian Mint   | CANADA                    |
| Gold         | SAAMP   | FRANCE                    |
| Gold         | Sabin Metal Corp.   | UNITED STATES OF AMERICA  |
| Gold         | Safimet S.p.A   | ITALY                     |
| Gold         | SAFINA A.S.   | CZECH REPUBLIC            |
| Gold         | Sai Refinery  | INDIA                     |
| Gold         | Samduck Precious Metals   | KOREA, REPUBLIC OF        |
| Gold         | Samwon Metals Corp.   | KOREA, REPUBLIC OF        |
| Gold         | SAXONIA Edelmetalle GmbH  | GERMANY                   |
| Gold         | Schone Edelmetaal B.V.  | NETHERLANDS               |
| Gold         | SEMPSA Joyeria Plateria S.A.  | SPAIN                     |
| Gold         | Shandong Tiancheng Biological Gold Industrial Co., Ltd.                     | CHINA                     |
| Gold         | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.                           | CHINA                     |
| Gold         | Sichuan Tianze Precious Metals Co., Ltd.                                    | CHINA                     |
| Gold         | Singway Technology Co., Ltd.  | TAIWAN, PROVINCE OF CHINA |
| Gold         | SOE Shyolkovsky Factory of Secondary Precious Metals                        | RUSSIAN FEDERATION        |
| Gold         | Solar Applied Materials Technology Corp.                                    | TAIWAN, PROVINCE OF CHINA |
| Gold         | State Research Institute Center for Physical Sciences and Technology        | LITHUANIA                 |
| Gold         | Sudan Gold Refinery   | SUDAN                     |
| Gold         | Sumitomo Metal Mining Co., Ltd.   | JAPAN                     |
| Gold         | SungEel HiTech  | KOREA, REPUBLIC OF        |
| Gold         | T.C.A S.p.A   | ITALY                     |
| Gold         | Tanaka Kikinzoku Kogyo K.K.   | JAPAN                     |

| <b>Metal</b> | <b>Standard Smelter Name</b>                        | <b>Smelter Country</b>   |
|--------------|---|--------------------------|
| Gold         | The Refinery of Shandong Gold Mining Co., Ltd.      | CHINA                    |
| Gold         | Tokuriki Honten Co., Ltd.                           | JAPAN                    |
| Gold         | Tongling Nonferrous Metals Group Co., Ltd.          | CHINA                    |
| Gold         | Tony Goetz NV                                       | BELGIUM                  |
| Gold         | TOO Tau-Ken-Altyn                                   | KAZAKHSTAN               |
| Gold         | Torecom   | KOREA, REPUBLIC OF       |
| Gold         | Umicore Brasil Ltda.                                | BRAZIL                   |
| Gold         | Umicore Precious Metals Thailand                    | THAILAND                 |
| Gold         | Umicore S.A. Business Unit Precious Metals Refining | BELGIUM                  |
| Gold         | United Precious Metal Refining, Inc.                | UNITED STATES OF AMERICA |
| Gold         | Universal Precious Metals Refining Zambia           | ZAMBIA                   |
| Gold         | Valcambi S.A.                                       | SWITZERLAND              |
| Gold         | Western Australian Mint (T/a The Perth Mint)        | AUSTRALIA                |
| Gold         | WIELAND Edelmetalle GmbH                            | GERMANY                  |
| Gold         | Yamamoto Precious Metal Co., Ltd.                   | JAPAN                    |
| Gold         | Yokohama Metal Co., Ltd.                            | JAPAN                    |
| Gold         | Yunnan Copper Industry Co., Ltd.                    | CHINA                    |
| Gold         | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | CHINA                    |
| Tantalum     | Asaka Riken Co., Ltd.                               | JAPAN                    |
| Tantalum     | Changsha South Tantalum Niobium Co., Ltd.           | CHINA                    |
| Tantalum     | D Block Metals, LLC                                 | UNITED STATES OF AMERICA |
| Tantalum     | Exotech Inc.  | UNITED STATES OF AMERICA |
| Tantalum     | F&X Electro-Materials Ltd.                          | CHINA                    |
| Tantalum     | FIR Metals & Resource Ltd.                          | CHINA                    |
| Tantalum     | Global Advanced Metals Aizu                         | JAPAN                    |
| Tantalum     | Global Advanced Metals Boyertown                    | UNITED STATES OF AMERICA |
| Tantalum     | Conghua Tantalum and Niobium Smeltry                | CHINA                    |
| Tantalum     | Guangdong Zhiyuan New Material Co., Ltd.            | CHINA                    |
| Tantalum     | H.C. Starck Co., Ltd.                               | THAILAND                 |
| Tantalum     | H.C. Starck Hermsdorf GmbH                          | GERMANY                  |
| Tantalum     | H.C. Starck Inc.                                    | UNITED STATES OF AMERICA |
| Tantalum     | H.C. Starck Ltd.                                    | JAPAN                    |
| Tantalum     | H.C. Starck Smelting GmbH & Co. KG                  | GERMANY                  |
| Tantalum     | H.C. Starck Tantalum and Niobium GmbH               | GERMANY                  |
| Tantalum     | Hengyang King Xing Lifeng New Materials Co., Ltd.   | CHINA                    |
| Tantalum     | Jiangxi Dinghai Tantalum & Niobium Co., Ltd.        | CHINA                    |
| Tantalum     | Jiangxi Tuohong New Raw Material                    | CHINA                    |
| Tantalum     | JiuJiang JinXin Nonferrous Metals Co., Ltd.         | CHINA                    |
| Tantalum     | Jiujiang Nonferrous Metals Smelting Company Limited | CHINA                    |
| Tantalum     | Jiujiang Zhongao Tantalum & Niobium Co., Ltd.       | CHINA                    |
| Tantalum     | KEMET Blue Metals                                   | MEXICO                   |
| Tantalum     | KEMET Blue Powder                                   | UNITED STATES OF AMERICA |
| Tantalum     | LSM Brasil S.A.                                     | BRAZIL                   |
| Tantalum     | Metallurgical Products India Pvt., Ltd.             | INDIA                    |
| Tantalum     | Mineracao Taboca S.A.                               | BRAZIL                   |

| <b>Metal</b> | <b>Standard Smelter Name</b>  | <b>Smelter Country</b>                     |
|--------------|---|--|
| Tantalum     | Mitsui Mining and Smelting Co., Ltd.  | JAPAN                                      |
| Tantalum     | Ningxia Orient Tantalum Industry Co., Ltd.  | CHINA                                      |
| Tantalum     | NPM Silmet AS   | ESTONIA                                    |
| Tantalum     | Power Resources Ltd.  | MACEDONIA, THE FORMER YUGOSLAV REPUBLIC OF |
| Tantalum     | QuantumClean  | UNITED STATES OF AMERICA                   |
| Tantalum     | Resind Industria e Comercio Ltda.   | BRAZIL                                     |
| Tantalum     | RFH Tantalum Smeltry Co., Ltd.  | CHINA                                      |
| Tantalum     | Solikamsk Magnesium Works OAO   | RUSSIAN FEDERATION                         |
| Tantalum     | Taki Chemical Co., Ltd.   | JAPAN                                      |
| Tantalum     | Telex Metals  | UNITED STATES OF AMERICA                   |
| Tantalum     | Ulba Metallurgical Plant JSC  | KAZAKHSTAN                                 |
| Tantalum     | XinXing HaoRong Electronic Material Co., Ltd.   | CHINA                                      |
| Tantalum     | Yichun Jin Yang Rare Metal Co., Ltd.  | CHINA                                      |
| Tin          | Alpha   | UNITED STATES OF AMERICA                   |
| Tin          | An Vinh Joint Stock Mineral Processing Company  | VIET NAM                                   |
| Tin          | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.                                     | CHINA                                      |
| Tin          | China Tin Group Co., Ltd.   | CHINA                                      |
| Tin          | CV Ayi Jaya   | INDONESIA                                  |
| Tin          | CV Dua Sekawan  | INDONESIA                                  |
| Tin          | CV Gita Pesona  | INDONESIA                                  |
| Tin          | CV Serumpun Sebalai   | INDONESIA                                  |
| Tin          | CV Tiga Sekawan   | INDONESIA                                  |
| Tin          | CV United Smelting  | INDONESIA                                  |
| Tin          | CV Venus Inti Perkasa   | INDONESIA                                  |
| Tin          | Dowa  | JAPAN                                      |
| Tin          | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | VIET NAM                                   |
| Tin          | EM Vinto  | BOLIVIA (PLURINATIONAL STATE OF)           |
| Tin          | Estanho de Rondonia S.A.  | BRAZIL                                     |
| Tin          | Fenix Metals  | POLAND                                     |
| Tin          | Gejiu Fengming Metallurgy Chemical Plant  | CHINA                                      |
| Tin          | Gejiu Jinye Mineral Company   | CHINA                                      |
| Tin          | Gejiu Kai Meng Industry and Trade LLC   | CHINA                                      |
| Tin          | Gejiu Non-Ferrous Metal Processing Co., Ltd.  | CHINA                                      |
| Tin          | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.  | CHINA                                      |
| Tin          | Gejiu Zili Mining And Metallurgy Co., Ltd.  | CHINA                                      |
| Tin          | Guangdong Hanhe Non-Ferrous Metal Co., Ltd.   | CHINA                                      |
| Tin          | Guanyang Guida Nonferrous Metal Smelting Plant  | CHINA                                      |
| Tin          | HuiChang Hill Tin Industry Co., Ltd.  | CHINA                                      |
| Tin          | Huichang Jinshunda Tin Co., Ltd.  | CHINA                                      |
| Tin          | Jiangxi Ketai Advanced Material Co., Ltd.   | CHINA                                      |
| Tin          | Magnu's Minerais Metais e Ligas Ltda.   | BRAZIL                                     |
| Tin          | Malaysia Smelting Corporation (MSC)   | MALAYSIA                                   |
| Tin          | Melt Metais e Ligas S.A.  | BRAZIL                                     |

| <b>Metal</b> | <b>Standard Smelter Name</b>                     | <b>Smelter Country</b>           |
|--------------|--|----------------------------------|
| Tin          | Metallic Resources, Inc.                         | UNITED STATES OF AMERICA         |
| Tin          | Metallo-Chimique N.V.                            | BELGIUM                          |
| Tin          | Elmet S.L.U.                                     | SPAIN                            |
| Tin          | Mineracao Taboca S.A.                            | BRAZIL                           |
| Tin          | Minsur   | PERU                             |
| Tin          | Mitsubishi Materials Corporation                 | JAPAN                            |
| Tin          | Modeltech Sdn Bhd                                | MALAYSIA                         |
| Tin          | Nankang Nanshan Tin Manufactory Co., Ltd.        | CHINA                            |
| Tin          | Nghe Tinh Non-Ferrous Metals Joint Stock Company | VIET NAM                         |
| Tin          | O.M. Manufacturing (Thailand) Co., Ltd.          | THAILAND                         |
| Tin          | O.M. Manufacturing Philippines, Inc.             | PHILIPPINES                      |
| Tin          | Operaciones Metalurgical S.A.                    | BOLIVIA (PLURINATIONAL STATE OF) |
| Tin          | PT Aries Kencana Sejahtera                       | INDONESIA                        |
| Tin          | PT Artha Cipta Langgeng                          | INDONESIA                        |
| Tin          | PT ATD Makmur Mandiri Jaya                       | INDONESIA                        |
| Tin          | PT Babel Inti Perkasa                            | INDONESIA                        |
| Tin          | PT Bangka Prima Tin                              | INDONESIA                        |
| Tin          | PT Bangka Tin Industry                           | INDONESIA                        |
| Tin          | PT Belitung Industri Sejahtera                   | INDONESIA                        |
| Tin          | PT Bukit Timah                                   | INDONESIA                        |
| Tin          | PT DS Jaya Abadi                                 | INDONESIA                        |
| Tin          | PT Eunindo Usaha Mandiri                         | INDONESIA                        |
| Tin          | PT Inti Stania Prima                             | INDONESIA                        |
| Tin          | PT Karimun Mining                                | INDONESIA                        |
| Tin          | PT Kijang Jaya Mandiri                           | INDONESIA                        |
| Tin          | PT Lautan Harmonis Sejahtera                     | INDONESIA                        |
| Tin          | PT Menara Cipta Mulia                            | INDONESIA                        |
| Tin          | PT Mitra Stania Prima                            | INDONESIA                        |
| Tin          | PT O.M. Indonesia                                | INDONESIA                        |
| Tin          | PT Panca Mega Persada                            | INDONESIA                        |
| Tin          | PT Prima Timah Utama                             | INDONESIA                        |
| Tin          | PT Refined Bangka Tin                            | INDONESIA                        |
| Tin          | PT Sariwiguna Binasentosa                        | INDONESIA                        |
| Tin          | PT Stanindo Inti Perkasa                         | INDONESIA                        |
| Tin          | PT Sukses Inti Makmur                            | INDONESIA                        |
| Tin          | PT Sumber Jaya Indah                             | INDONESIA                        |
| Tin          | PT Timah (Persero) Tbk Kundur                    | INDONESIA                        |
| Tin          | PT Timah (Persero) Tbk Mentok                    | INDONESIA                        |
| Tin          | PT Tinindo Inter Nusa                            | INDONESIA                        |
| Tin          | PT Tommy Utama                                   | INDONESIA                        |
| Tin          | Resind Industria e Comercio Ltda.                | BRAZIL                           |
| Tin          | Rui Da Hung                                      | TAIWAN, PROVINCE OF CHINA        |
| Tin          | Soft Metais Ltda.                                | BRAZIL                           |
| Tin          | Super Ligas                                      | BRAZIL                           |
| Tin          | Thaisarco  | THAILAND                         |



| <b>Metal</b> | <b>Standard Smelter Name</b>                                  | <b>Smelter Country</b>   |
|--------------|---|--------------------------|
| Tin          | Tuyen Quang Non-Ferrous Metals Joint Stock Company            | VIET NAM                 |
| Tin          | White Solder Metalurgia e Mineracao Ltda.                     | BRAZIL                   |
| Tin          | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.                 | CHINA                    |
| Tin          | Yunnan Tin Company Limited                                    | CHINA                    |
| Tungsten     | A.L.M.T. TUNGSTEN Corp.                                       | JAPAN                    |
| Tungsten     | ACL Metais Eireli   | BRAZIL                   |
| Tungsten     | Asia Tungsten Products Vietnam Ltd.                           | VIET NAM                 |
| Tungsten     | Chenzhou Diamond Tungsten Products Co., Ltd.                  | CHINA                    |
| Tungsten     | Chongyi Zhangyuan Tungsten Co., Ltd.                          | CHINA                    |
| Tungsten     | Fujian Jinxin Tungsten Co., Ltd.                              | CHINA                    |
| Tungsten     | Ganzhou Haichuang Tungsten Industry Co., Ltd.                 | CHINA                    |
| Tungsten     | Ganzhou Huaxing Tungsten Products Co., Ltd.                   | CHINA                    |
| Tungsten     | Ganzhou Jiangwu Ferrotungsten Co., Ltd.                       | CHINA                    |
| Tungsten     | Ganzhou Seadragon W & Mo Co., Ltd.                            | CHINA                    |
| Tungsten     | Ganzhou Yatai Tungsten Co., Ltd.                              | CHINA                    |
| Tungsten     | Global Tungsten & Powders Corp.                               | UNITED STATES OF AMERICA |
| Tungsten     | Guangdong Xianglu Tungsten Co., Ltd.                          | CHINA                    |
| Tungsten     | H.C. Starck Smelting GmbH & Co. KG                            | GERMANY                  |
| Tungsten     | H.C. Starck Tungsten GmbH                                     | GERMANY                  |
| Tungsten     | Hunan Chenzhou Mining Co., Ltd.                               | CHINA                    |
| Tungsten     | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wujia              | CHINA                    |
| Tungsten     | Hunan Chunchang Nonferrous Metals Co., Ltd.                   | CHINA                    |
| Tungsten     | Hunan Litian Tungsten Industry Co., Ltd.                      | CHINA                    |
| Tungsten     | Hydrometallurg, JSC   | RUSSIAN FEDERATION       |
| Tungsten     | Japan New Metals Co., Ltd.                                    | JAPAN                    |
| Tungsten     | Jiangwu H.C. Starck Tungsten Products Co., Ltd.               | CHINA                    |
| Tungsten     | Jiangxi Dayu Longxintai Tungsten Co., Ltd.                    | CHINA                    |
| Tungsten     | Jiangxi Gan Bei Tungsten Co., Ltd.                            | CHINA                    |
| Tungsten     | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.         | CHINA                    |
| Tungsten     | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | CHINA                    |
| Tungsten     | Jiangxi Xinsheng Tungsten Industry Co., Ltd.                  | CHINA                    |
| Tungsten     | Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd.          | CHINA                    |
| Tungsten     | Jiangxi Yaosheng Tungsten Co., Ltd.                           | CHINA                    |
| Tungsten     | Kennametal Fallon   | UNITED STATES OF AMERICA |
| Tungsten     | Kennametal Huntsville   | UNITED STATES OF AMERICA |
| Tungsten     | Malipo Haiyu Tungsten Co., Ltd.                               | CHINA                    |
| Tungsten     | Moliren Ltd.  | RUSSIAN FEDERATION       |
| Tungsten     | Niagara Refining LLC  | UNITED STATES OF AMERICA |
| Tungsten     | Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC     | VIET NAM                 |
| Tungsten     | Philippine Chuangxin Industrial Co., Inc.                     | PHILIPPINES              |
| Tungsten     | South-East Nonferrous Metal Company Limited of Hengyang City  | CHINA                    |
| Tungsten     | Tejing (Vietnam) Tungsten Co., Ltd.                           | VIET NAM                 |
| Tungsten     | Unecha Refractory metals plant                                | RUSSIAN FEDERATION       |
| Tungsten     | Vietnam Youngsun Tungsten Industry Co., Ltd.                  | VIET NAM                 |
| Tungsten     | Wolfram Bergbau und Hutten AG                                 | AUSTRIA                  |

| Metal    | Standard Smelter Name                                       | Smelter Country    |
|----------|---|--------------------|
| Tungsten | Woltech Korea Co., Ltd.                                     | KOREA, REPUBLIC OF |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd.                            | CHINA              |
| Tungsten | Xiamen Tungsten Co., Ltd.                                   | CHINA              |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd. | CHINA              |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd.                   | CHINA              |

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**TABLE 5**

**Countries of Origin<sup>5</sup>**

|                              |                    |                    |                       |
|------------------------------|--------------------|--------------------|-----------------------|
| Andorra                      | Finland            | Netherlands        | Tanzania              |
| Argentina                    | French Guyana      | New Caledonia      | Thailand              |
| Australia                    | Georgia            | New Zealand        | Turkey                |
| Austria                      | Germany            | Papua New Guinea   | Uganda                |
| Belgium                      | Ghana              | Peru               | United Kingdom        |
| Bolivia                      | Guyana             | Philippines        | USA                   |
| Botswana                     | Honduras           | Poland             | Uzbekistan            |
| Brazil                       | India              | Portugal           | Vietnam               |
| Bulgaria                     | Indonesia          | Russian Federation | Zambia <sup>6</sup>   |
| Burkina Faso                 | Italy              | Rwanda             | Zimbabwe <sup>7</sup> |
| Burundi                      | Japan              | Singapore          |                       |
| Cambodia                     | Kazakhstan         | Solomon Islands    |                       |
| Canada                       | Korea, Republic Of | South Africa       |                       |
| Chile                        | Kyrgyzstan         | South America      |                       |
| China                        | Laos               | Spain              |                       |
| Colombia                     | Lithuania          | Sudan <sup>8</sup> |                       |
| Democratic Republic of Congo | Macedonia          | Sweden             |                       |
| Estonia                      | Malaysia           | Switzerland        |                       |
| Ethiopia                     | Mexico             | Taiwan             |                       |
| Fiji                         | Myanmar            | Tajikistan         |                       |

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<sup>5</sup> Microchip's Countries of Origin and reason to believe Countries of Origin list.

<sup>6</sup> Please refer to Section 3.3, of this Conflict Minerals Report for the discussion of due diligence and removal action taken against Universal Precious Metals Refining Zambia, the only reported smelter in Zambia.

<sup>7</sup> Please refer to Section 3.3, of this Conflict Minerals Report for the discussion of due diligence and removal action taken against Fidelity Printers and Refiners Ltd., the only reported smelter in Zimbabwe.

<sup>8</sup> Please refer to Section 3.3, of this Conflict Minerals Report for the discussion of due diligence and removal action taken against Sudan Gold Refinery, the only reported smelter in Sudan.

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### **Caution Concerning Forward-Looking Statements**

This Conflict Minerals Report contains forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995. Such forward-looking statements include the statements that we are working toward a goal to ensure our products are manufactured and/or sourced from socially responsible supply chains, that we plan to engage with any of our suppliers whom we have reason to believe are supplying us with 3TG from sources that support conflict in the DRC and the steps set forth in Section 5 that we intend to take to improve the due diligence conducted. We also use words such as "anticipate," "believe," "plan," "expect," "future," "intend" and similar expressions to identify forward-looking statements. All forward-looking statements involve risk and uncertainty. Our actual results could differ materially from the results anticipated in these forward-looking statements for a number of reasons including changes in our supply chain, our ability or inability to obtain an adequate supply of materials from current or alternative suppliers and the cost of such materials, the level of cooperation we receive from our suppliers with respect to our further due diligence, changes in regulations in the U.S. or other countries (including the Covered Countries), or changes in political or economic conditions in the U.S. or other countries (including the Covered Countries). For a detailed discussion of these and other risk factors, please refer to Microchip's filings on forms 10-K and 10-Q. You can obtain copies of Forms 10-K and 10-Q and other relevant documents for free at Microchip's website ([www.microchip.com](http://www.microchip.com)) or the SEC's website ([www.sec.gov](http://www.sec.gov)) or from commercial document retrieval services. Forward-looking statements are based on our current expectations and assumptions, which may not prove to be accurate. Although we believe that the expectations reflected in the forward-looking statements are reasonable, we cannot guarantee future results, levels of activity, performance or achievements. You should not place undue reliance on these forward-looking statements. We disclaim any obligation to update information contained in any forward-looking statement.