

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

**FORM SD
Specialized Disclosure Report**

HARMONIC INC.
(Exact name of Registrant as specified in its charter)

| | | |
|---|---|---|
| Delaware (State or other jurisdiction of incorporation or organization) | 000-25826 Commission File Number | 77-0201147 (I.R.S. Employer Identification Number) |
| 4300 North First Street, San Jose, CA (Address of principal offices) | | 95134 (Zip code) |
| Timothy C. Chu (Name and telephone number, including area code, of the person to contact in connection with this report.) | | (408) 542-2500 |

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, 2015.
-

Section 1 – Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

Harmonic Inc. (“Harmonic”, “we” or “our”) conducted an analysis of its products and determined that almost all of the products that we manufacture or contract to manufacture (the “Covered Products”) contain gold, columbite-tantalite (coltan), cassiterite and/or wolframite, including their derivatives which are limited to tantalum, tin and tungsten (together, “3TG” or “Conflict Minerals”). Thereafter, we undertook in good faith a reasonable country of origin inquiry (“RCOI”) reasonably designed to determine if any 3TG originated in the Democratic Republic of Congo (the “DRC”), the Republic of Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola (collectively, the “Covered Countries”) and whether any of the 3TG may be from recycled or scrap sources with respect to products: (i) for which 3TG are necessary to the functionality or production of that product; (ii) that were manufactured, or contracted to be manufactured, by Harmonic; and (iii) for which the manufacture was completed during calendar year 2015.

Based on our RCOI, we were unable to determine that the 3TG did not originate in the Covered Countries, or if our 3TG came from recycled or scrap sources.

After performing the RCOI, we implemented a diligence process designed to conform with the OECD Guidance in order to exercise due diligence on the source and chain of custody of the Conflict Minerals.

After performing the RCOI and due diligence, because we were unable to comprehensively determine the origin of all Conflict Minerals used in our products, the facilities used to process them, their country of origin, and their mine or location of origin, whether or not they came from recycled or scrap resources, we concluded that our products are “DRC Conflict Undeterminable” with regard to calendar year 2015.

A copy of Harmonic’s Conflict Minerals Report is provided as Exhibit 1.01 hereto and is publicly available at www.harmonicinc.com under "About Us - Global Citizenship."

Item 1.02 Exhibit

As specified in Section 2, Item 2.01 of this Form SD, Harmonic is hereby filing its Conflict Minerals Report as Exhibit 1.01 to this Form SD.

Section 2 - Exhibits

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

Item 2.01 Exhibits

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

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.

Date: May 31, 2016

HARMONIC INC.

By: /s/ Charles Bonasera
Charles Bonasera
Senior Vice President, Operations

Harmonic Inc.
Conflict Minerals Report
For The Year Ended December 31, 2015

This Conflict Minerals Report (“CMR”) of Harmonic Inc. (“Harmonic”) for the calendar year ended December 31, 2015 is presented to comply with Rule 13p-1 under the Securities Exchange Act of 1934 (the “Rule”). Unless otherwise defined herein, please refer to the Rule, our Specialized Disclosure Report on Form SD and SEC Release No. 34-67716 issued by the Securities and Exchange Commission on August 22, 2012 for definitions to the terms used in this Report.

The Rule requires disclosure of certain information when a company manufactures or contracts to manufacture products and the minerals specified in the Rule are necessary to the functionality or production of those products (“Covered Products”). The specified minerals referred to as “Conflict Minerals” or “3TG” are gold, columbite-tantalite (coltan), cassiterite and wolframite, including their derivatives which are limited to tantalum, tin and tungsten. The “Covered Countries” for purposes of the Rule and this Report are the Democratic Republic of Congo (the “DRC”), the Republic of Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola.

1. COMPANY OVERVIEW

We design, manufacture and sell versatile and high performance video infrastructure products and system solutions that enable our customers to efficiently create, prepare and deliver a full range of video services to consumer devices, including televisions, personal computers, laptops, tablets and smart phones. We sell video processing and production and playout solutions and services worldwide to broadcast and media companies, streaming new media companies, cable operators and satellite and telecommunications pay-TV service providers. We sell cable edge and Converged Cable Access Protocol (CCAP) solutions and related services to cable operators globally.

The information in this CMR includes the activities of all majority-owned subsidiaries and variable interest entities that are required to be consolidated. It does not include the activities of variable interest entities that are not required to be consolidated. This report is available on our website at www.harmonicinc.com/sites/default/files/cmr-report-2015.pdf

Harmonic products are manufactured by our third party contractors using full turnkey electronic manufacturing services (“EMS”). Materials and components used in our products are purchased by our third party contractors from third party suppliers. Harmonic does not purchase raw ore or unrefined conflict minerals directly from other parties and makes no direct purchases in the Covered Countries. We rely on our suppliers, whose components contain 3TG, to provide us with information about the source of Conflict Minerals. Our suppliers are similarly reliant upon information provided by their suppliers. Many of our largest suppliers are also SEC registrants and subject to the Rule.

2. DESIGN OF DUE DILIGENCE

In accordance with the five-step guidelines of the Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Second Edition, and related supplements on gold, tin, tantalum and tungsten (collectively, the “OECD Guidance”), the design of our due diligence includes, but is not limited to, the following five steps:

- (i) establishment of strong company management systems;
- (ii) identification and assessment of risks in the supply chain;
- (iii) designing and implementing a strategy to respond to identified risks;
- (iv) supporting the development and implementation of independent third party audits of smelters’ and refiners’ sourcing; and
- (v) reporting on supply chain due diligence.

A description of certain activities undertaken by us in respect of each of the five steps of the OECD Guidance is described below.

2.1 Management Systems

2.1.1 Conflict Mineral Policy

Harmonic has adopted a Conflict Minerals Policy which is attached to this report as [Annex 1](#), and posted on our website at <http://harmonicinc.com/content/conflict-minerals-policy>. This website address is included for reference only. The information contained on Harmonic's website is not incorporated by reference into this CMR.

2.1.2 Internal Team

Harmonic has established a Conflict Minerals Reporting Oversight Committee that includes the Vice President of Corporate Quality, the Director of Supply Chain Management sponsored by the Senior Vice President of Operations, as well as executive-level representatives and a team of subject matter experts from relevant functions such as Legal, Regulatory Compliance, Engineering, and Sales. Led by the Conflict Minerals program manager, the team of subject matter experts is responsible for implementing our Conflict Minerals compliance strategy. Our senior management is regularly briefed on the results of our due diligence efforts.

2.1.3 Control Systems

As we do not typically have a direct relationship with 3TG smelters and refiners, we are engaged and actively communicate with our EMS providers and their suppliers. We participate in the Electronics Industry Citizenship Coalition - Global e-Sustainability Initiative's (EICC-GeSI) Conflict Free Sourcing Initiative (CFSI), which provides disclosures of upstream suppliers in the supply chain.

Our controls include, but are not limited to, our (a) Code of Business Conduct and Ethics, which is available at <http://investor.harmonicinc.com/phoenix.zhtml?c=90244&p=irol-govHighlights> and outlines expected behaviors for all Harmonic employees, and (b) Supplier Code of Conduct, which is available at <http://www.harmonicinc.com/content/supplier-code-conduct>. These website addresses are included for reference only. The information contained on Harmonic's website is not incorporated by reference into this CMR.

2.1.4 Supplier Engagement and Activities

Although we do not purchase materials and components directly from third party suppliers, as part of our risk management plan to ensure suppliers understand our expectations, we have included in our Supplier Code of Conduct information regarding relevant and applicable environmental compliance obligations and responsible sourcing of Conflict Minerals. Harmonic compliance personnel also send periodic emails and training documents to our suppliers to create awareness and inform them about updates regarding rules and regulations relating to Conflict Minerals.

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. We support audits through our adoption of CFSI initiatives and recommendations.

2.1.5 Grievance Mechanism

We have grievance mechanisms whereby employees and suppliers can report violations of Harmonic's policies either anonymously or non-anonymously under our Whistle Blower Policy and Code of Business Conduct and Ethics, or non-anonymously to Harmonic's Human Resources department.

2.1.6 Maintenance Record

We have adopted a policy to retain compliance data and relevant documentation for at least 5 years from the date of last use or issuance, whichever is later.

2.1.7 Identify and Assess Risk in the Supply Chain

Because of our size, the complexity of our products, and the depth, breadth, and constant evolution of our supply chain, it is difficult to identify suppliers that are upstream from our more direct suppliers. Accordingly, we participate in a number of industry-wide initiatives as described in section 3 below.

We rely on our suppliers, whose components contain 3TG, to provide us with information about the source of Conflict Minerals. Our suppliers are similarly reliant upon information provided by their suppliers. Many of our largest suppliers are also SEC registrants and subject to the Rule.

2.1.8 Design and Implement a Strategy to Respond to Risks

In response to this risk assessment, Harmonic has an approved risk management plan, through which the Conflict Minerals program is implemented, managed and monitored. Updates to this risk assessment are provided regularly to senior management.

As part of our risk management plan, to ensure suppliers understand our expectations, we have posted information on our company website regarding relevant and applicable environmental compliance obligations, including responsible sourcing of Conflict Minerals, to Harmonic and its suppliers. The Harmonic Compliance Team also sends periodic emails and training documents to our suppliers to create awareness and inform them about updates to rules and regulations relating to Conflict Minerals.

As described in our Conflict Minerals policy, we require all suppliers in our supply chain to utilize materials that originate from DRC conflict-free smelters certified by the EICC. However, if we determine that any supplier is, or a reasonable risk exists that it may be, violating this policy, then we will require the supplier to commit to devise and undertake suitable corrective action to move to a conflict free source

2.1.9. 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. We support audits through our participation in the CFSI.

2.1.10 Report on supply chain due diligence

Harmonic's due diligence measures included:

- a. Conducting a supply-chain survey with direct suppliers of materials containing Conflict Minerals using the EICC-GeSI Conflict Minerals Reporting Template to identify the smelters and refiners; and
- b. Comparing the smelters and refiners identified in the supply-chain survey against the list of smelter facilities which have been identified as "conflict free" by programs such as the EICC-GeSI Conflict Free Smelter Program for tantalum, tin, tungsten and gold.

Our suppliers were also provided with instructions and guidance to complete the template.

3. YEAR 2015 DUE DILIGENCE EFFORTS

3.1 Due Diligence Implementation

We conducted an analysis of our products and found that almost all of our products, excluding software products, are Covered Products. Thereafter, we undertook in good faith a reasonable country of origin inquiry ("RCOI") reasonably designed to determine if any 3TG originated in the Covered Countries and whether any of the 3TG may be from recycled or scrap sources with respect to products: (i) for which 3TG are necessary to the functionality or production of that product; (ii) that were manufactured, or contracted to be manufactured, by Harmonic; and (iii) for which the manufacture was completed during calendar year 2015.

Based on our RCOI, we were unable to determine that the 3TG did not originate in the Covered Countries, or if our 3TG came from recycled or scrap sources.

After performing the RCOI, we implemented a diligence process designed to conform with the OECD Guidance in order to exercise due diligence on the source and chain of custody of the Conflict Minerals.

3.2 Supply Chain Due Diligence Process

We relied on our EMS contractors and their suppliers to provide information on the origin of the 3TG contained in components and materials supplied to us - including sources of 3TG that are supplied to them by their lower tier suppliers.

3.2.1 Efforts to Determine Mine or Location of Origin

Through our participation in CFSI and OECD implementation programs, and requesting our suppliers to complete the EICC/GeSI Conflict Minerals Reporting template, we have determined that seeking information about 3TG smelters and refiners in our supply chain represents the most reasonable effort we can make to determine the mines or locations of origin of the 3TG in our supply chain. Please visit our FAQ section on our website at <http://harmonicinc.com/content/frequently-asked-questions-faqs>. This website

address is included for reference only. The information contained on Harmonic’s website is not incorporated by reference into this CMR.

3.2.2 *The Survey*

We used the reporting template prepared by the EICC-GeSI to collect Conflict Minerals and smelter information from our first tier suppliers. We contacted and surveyed all of our first tier suppliers who supplied components and materials to us through our EMS contractors after January 01, 2015. In addition, we included suppliers where the nature of the component, or the location of the supplier, indicated that those components were likely to contain 3TG.

3.2.3 *Survey Responses*

We sent out the EICC-GeSI survey to 100% of our direct suppliers that are in scope of our RCOI, and we received responses from approximately 68% of our suppliers through our initial survey and follow-up efforts. These 68% suppliers covered 88% of our total affected parts. Responses were reviewed for completeness, reasonableness, and consistency, and we routinely followed up with our contract manufacturers and component suppliers for corrections and clarifications as needed.

Supplier responses included the names of approximately 320 entities identified by our suppliers as smelters or refiners.

In the supplier responses, 216 smelters and refiners were identified as certified Conflict-Free using the EICC-GeSI list. In order to verify the claimed status, we compared the names of those entities and confirmed their inclusion on the CFSI’s current lists of Conflict-Free smelters. In addition, 104 smelters were identified and confirmed as “known” smelters using the smelter list from EICC-GeSI form version 4.01b. Out of 104 “known”/non-conflict free smelters/refiners, 47 are being in process of getting audited/certified by CFSI and remaining 57 were not included on the CFSI’s current lists of Conflict-Free smelters.

Furthermore, approximately 17% (40 suppliers) of suppliers who responded to RCOI inquiry provided us with information at a part number level. However, the rest of our suppliers provided data at a company or divisional level, so we were unable to specify the smelters or refiners used for components supplied to Harmonic. With the exception of the 17% suppliers described above, we are therefore unable to determine whether any of the Conflict Minerals reported by the suppliers were contained in components or parts supplied to us or to validate that any of these smelters or refiners are actually in our supply chain.

3.3 *List of Smelters and Refiners*

Based on the survey responses summarized above in Section 3.2.3, we have prepared Annex 2 of this report, which includes the names of smelters and refiners that are identified as certified conflict-free smelters from the CFSI list (dated as of November 16, 2015) and “known” smelters that were identified from the EICC-GeSI smelters list (data collection template version 4.01b), but which are either in process of getting certified as “conflict-free” or were not included on the CFSI’s current list of Conflict-Free smelters.

3.4 *Report on Supply Chain Due Diligence*

After performing the RCOI and due diligence, because we were unable to comprehensively determine the origin of all Conflict Minerals used in our products, the facilities used to process them, their country of origin, and their mine or location of origin, whether or not they came from recycled or scrap resources, we concluded that our products are “DRC Conflict Undeterminable” with regard to calendar year 2015.

4. **Risk Mitigation**

In the next compliance period, Harmonic will continue to take steps listed below to improve the information gathered from its due diligence to further mitigate any risk that the Conflict Minerals in our products do not benefit armed groups in the Covered Countries:

- a. Continue to include a Conflict Minerals flow-down clause in new or renewed supplier contracts;
- b. Continue contacting and following up with our suppliers to solicit more responses to our survey;
- c. Direct our suppliers to training resources to educate and create awareness among our suppliers about Conflict Minerals and their role in mitigating risk and creating a transparent supply chain, and to educate our suppliers about our Conflict Minerals policy;

- d. Consider terminating any of our suppliers for not responding to our survey or found to be supplying us with 3TG from Covered Countries; and
- e. Work with the OECD and relevant trade associations and other resources to define and improve best practices and build leverage over the supply chain in accordance with the OECD Guidance.

ANNEX 1 - CONFLICT MINERALS POLICY

Harmonic is committed to ethical sourcing of minerals used in our products and supports the objectives of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”), which aims to prevent the use of conflict minerals that directly or indirectly finance or benefit armed groups in The Democratic Republic of the Congo (DRC) and adjoining countries.

Our direct suppliers and contract manufacturers are required to comply with Harmonic’s Supplier Code of Conduct, which includes requirements relating to conflict minerals and responsible sourcing. We educate our suppliers on these matters and steps they can take to achieve increased transparency regarding the origin of minerals contained in the products they manufacture and sell to Harmonic. We require all suppliers in our supply chain to utilize materials that originate outside of the DRC or otherwise from DRC conflict-free smelters certified by the Electronics Industry Citizenship Coalition (EICC) or to otherwise certify to us as to their conflict-free status. We conduct periodic reviews with our suppliers to ensure that they are in compliance with this policy.

Harmonic, like many companies in the electronics industry, uses components in the manufacture of our products that include some of the minerals covered under the Dodd-Frank Act. However, we do not purchase these minerals directly from smelters or mines; therefore, we must rely on the source information provided by our suppliers in the Electronics Industry Citizenship Coalition-Global e-Sustainability Initiative’s (EICC-GeSI) Conflict Free Sourcing Initiative (CFSI) survey template. We make reasonable efforts in our supply chain to identify country or mine of origin of the subject minerals we use and expect that our suppliers make similar efforts in their supply chains.

Harmonic continues to work closely with its supply chain to trace newly mined minerals back to their origin in order to ensure responsible sourcing.

If you require specific conflict mineral sourcing information for Harmonic products or require more information on our policy, please contact the Harmonic Product Compliance Team at regulatory.compliance@harmonicinc.com.

In addition to this conflict minerals policy, we have established a conflict minerals compliance program that is designed to follow the framework established by the Organization for Economic Cooperation and Development (OECD).

For additional information about our commitment to responsible sourcing and other ethical practices, see our Code of Business Conduct and Ethics.

This policy is publicly available on our website at <http://harmonicinc.com/content/conflict-minerals-policy>.

ANNEX 2 - LIST OF SMELTERS AND REFINERS

SMELTERS/REFINERS FROM EICC-GeSI LIST THAT ARE CERTIFIED AS CONFLICT FREE BY CFSI

| Metal | Certified Conflict-Free Smelters/Refiners | Country of Origin | Conflict Free |
|--------------|---|--------------------------|----------------------|
| Gold | Aida Chemical Industries Co., Ltd. | JAPAN | Yes |
| Gold | Allgemeine Gold-und Silberscheideanstalt A.G. | GERMANY | Yes |
| Gold | AngloGold Ashanti Córrego do Sítio Mineração | BRAZIL | Yes |
| Gold | Argor-Heraeus SA | SWITZERLAND | Yes |
| Gold | Asahi Pretec Corporation | JAPAN | Yes |
| Gold | Asahi Refining Canada Limited | CANADA | Yes |
| Gold | Asahi Refining USA Inc. | UNITED STATES | Yes |
| Gold | Asaka Riken Co., Ltd. | JAPAN | Yes |
| Gold | Aurubis AG | GERMANY | Yes |
| Gold | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | PHILIPPINES | Yes |
| Gold | Boliden AB | SWEDEN | Yes |
| Gold | C. Hafner GmbH + Co. KG | GERMANY | Yes |
| Gold | CCR Refinery - Glencore Canada Corporation | CANADA | Yes |
| Gold | Chimet S.p.A. | ITALY | Yes |
| Gold | DODUCO GmbH | GERMANY | Yes |
| Gold | Dowa | JAPAN | Yes |
| Gold | Eco-System Recycling Co., Ltd. | JAPAN | Yes |
| Gold | Elemental Refining, LLC | UNITED STATES | Yes |
| Gold | Emirates Gold DMCC | UNITED ARAB EMIRATES | Yes |
| Gold | Heimerle + Meule GmbH | GERMANY | Yes |
| Gold | Heraeus Ltd. Hong Kong | CHINA | Yes |
| Gold | Heraeus Precious Metals GmbH & Co. KG | GERMANY | Yes |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Company Limited | CHINA | Yes |
| Gold | Ishifuku Metal Industry Co., Ltd. | JAPAN | Yes |
| Gold | Istanbul Gold Refinery | TURKEY | Yes |
| Gold | Japan Mint | JAPAN | Yes |
| Gold | Jiangxi Copper Company Limited | CHINA | Yes |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant | RUSSIAN FEDERATION | Yes |
| Gold | JSC Uralelectromed | RUSSIAN FEDERATION | Yes |
| Gold | JX Nippon Mining & Metals Co., Ltd. | JAPAN | Yes |
| Gold | Kazzinc | KAZAKHSTAN | Yes |
| Gold | Kennecott Utah Copper LLC | UNITED STATES | Yes |
| Gold | Kojima Chemicals Co., Ltd. | JAPAN | Yes |
| Gold | LS-NIKKO Copper Inc. | REPUBLIC OF KOREA | Yes |
| Gold | Materion | UNITED STATES | Yes |
| Gold | Matsuda Sangyo Co., Ltd. | JAPAN | Yes |
| Gold | Metalor Technologies (Hong Kong) Ltd. | CHINA | Yes |
| Gold | Metalor Technologies (Singapore) Pte., Ltd. | SINGAPORE | Yes |
| Gold | Metalor Technologies SA | SWITZERLAND | Yes |
| Gold | Metalor USA Refining Corporation | UNITED STATES | Yes |

| | | | |
|----------|---|--------------------|-----|
| Gold | METALÚRGICA MET-MEX PEÑOLES, S.A. DE C.V | MEXICO | Yes |
| Gold | Mitsubishi Materials Corporation | JAPAN | Yes |
| Gold | Mitsui Mining and Smelting Co., Ltd. | JAPAN | Yes |
| Gold | MMTC-PAMP India Pvt., Ltd. | INDIA | Yes |
| Gold | Moscow Special Alloys Processing Plant | RUSSIAN FEDERATION | Yes |
| Gold | Nadir Metal Rafineri San. Ve Tic. A. ^a . | TURKEY | Yes |
| Gold | Nihon Material Co., Ltd. | JAPAN | Yes |
| Gold | Ögussa Österreichische Gold- und Silber-Scheideanstalt GmbH | AUSTRIA | Yes |
| Gold | Ohura Precious Metal Industry Co., Ltd. | JAPAN | Yes |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | RUSSIAN FEDERATION | Yes |
| Gold | OJSC Novosibirsk Refinery | RUSSIAN FEDERATION | Yes |
| Gold | PAMP SA | SWITZERLAND | Yes |
| Gold | Prioksky Plant of Non-Ferrous Metals | RUSSIAN FEDERATION | Yes |
| Gold | PT Aneka Tambang (Persero) Tbk | INDONESIA | Yes |
| Gold | PX Précinox SA | SWITZERLAND | Yes |
| Gold | Rand Refinery (Pty) Ltd. | SOUTH AFRICA | Yes |
| Gold | Republic Metals Corporation | UNITED STATES | Yes |
| Gold | Royal Canadian Mint | CANADA | Yes |
| Gold | Schone Edelmetaal B.V. | NETHERLANDS | Yes |
| Gold | SEMPSA Joyería Platería SA | SPAIN | Yes |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd. | CHINA | Yes |
| Gold | Sichuan Tianze Precious Metals Co., Ltd. | CHINA | Yes |
| Gold | Singway Technology Co., Ltd. | TAIWAN | Yes |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals | RUSSIAN FEDERATION | Yes |
| Gold | Solar Applied Materials Technology Corp. | TAIWAN | Yes |
| Gold | Sumitomo Metal Mining Co., Ltd. | JAPAN | Yes |
| Gold | T.C.A S.p.A | ITALY | Yes |
| Gold | Tanaka Kikinzoku Kogyo K.K. | JAPAN | Yes |
| Gold | The Refinery of Shandong Gold Mining Co., Ltd. | CHINA | Yes |
| Gold | Tokuriki Honten Co., Ltd. | JAPAN | Yes |
| Gold | Umicore Brasil Ltda. | BRAZIL | Yes |
| Gold | Umicore Precious Metals Thailand | THAILAND | Yes |
| Gold | Umicore SA Business Unit Precious Metals Refining | BELGIUM | Yes |
| Gold | United Precious Metal Refining, Inc. | UNITED STATES | Yes |
| Gold | Valcambi SA | SWITZERLAND | Yes |
| Gold | Western Australian Mint trading as The Perth Mint | AUSTRALIA | Yes |
| Gold | Yamamoto Precious Metal Co., Ltd. | JAPAN | Yes |
| Gold | Yokohama Metal Co., Ltd. | JAPAN | Yes |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | CHINA | Yes |
| Gold | Zijin Mining Group Co., Ltd. Gold Refinery | CHINA | Yes |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd. | CHINA | Yes |
| Tantalum | Conghua Tantalum and Niobium Smeltry | CHINA | Yes |
| Tantalum | D Block Metals, LLC | UNITED STATES | Yes |
| Tantalum | Duoluoshan | CHINA | Yes |
| Tantalum | Exotech Inc. | UNITED STATES | Yes |

| | | | |
|----------|---|--------------------|-----|
| Tantalum | F&X Electro-Materials Ltd. | CHINA | Yes |
| Tantalum | FIR Metals & Resource Ltd. | CHINA | Yes |
| Tantalum | Global Advanced Metals Aizu | JAPAN | Yes |
| Tantalum | Global Advanced Metals Boyertown | UNITED STATES | Yes |
| Tantalum | Guangdong Zhiyuan New Material Co., Ltd. | CHINA | Yes |
| Tantalum | H.C. Starck Co., Ltd. | THAILAND | Yes |
| Tantalum | H.C. Starck GmbH Goslar | GERMANY | Yes |
| Tantalum | H.C. Starck GmbH Laufenburg | GERMANY | Yes |
| Tantalum | H.C. Starck Hermsdorf GmbH | GERMANY | Yes |
| Tantalum | H.C. Starck Inc. | UNITED STATES | Yes |
| Tantalum | H.C. Starck Ltd. | JAPAN | Yes |
| Tantalum | H.C. Starck Smelting GmbH & Co.KG | GERMANY | Yes |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd. | CHINA | Yes |
| Tantalum | Hi-Temp Specialty Metals, Inc. | UNITED STATES | Yes |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd. | CHINA | Yes |
| Tantalum | Jiangxi Tuohong New Raw Material | CHINA | Yes |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd. | CHINA | Yes |
| Tantalum | Jiujiang Tanbre Co., Ltd. | CHINA | Yes |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd. | CHINA | Yes |
| Tantalum | KEMET Blue Metals | MEXICO | Yes |
| Tantalum | KEMET Blue Powder | UNITED STATES | Yes |
| Tantalum | King-Tan Tantalum Industry Ltd. | CHINA | Yes |
| Tantalum | LSM Brasil S.A. | BRAZIL | Yes |
| Tantalum | Metallurgical Products India Pvt., Ltd. | INDIA | Yes |
| Tantalum | Mineração Taboca S.A. | BRAZIL | Yes |
| Tantalum | Mitsui Mining & Smelting | JAPAN | Yes |
| Tantalum | Molycorp Silmet A.S. | ESTONIA | Yes |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd. | CHINA | Yes |
| Tantalum | Plansee SE Liezen | AUSTRIA | Yes |
| Tantalum | Plansee SE Reutte | AUSTRIA | Yes |
| Tantalum | QuantumClean | UNITED STATES | Yes |
| Tantalum | Resind Indústria e Comércio Ltda. | BRAZIL | Yes |
| Tantalum | RFH Tantalum Smeltry Co., Ltd. | CHINA | Yes |
| Tantalum | Solikamsk Magnesium Works OAO | RUSSIAN FEDERATION | Yes |
| Tantalum | Taki Chemicals | JAPAN | Yes |
| Tantalum | Telex Metals | UNITED STATES | Yes |
| Tantalum | Tranzact, Inc. | UNITED STATES | Yes |
| Tantalum | Ulba Metallurgical Plant JSC | KAZAKHSTAN | Yes |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd. | CHINA | Yes |
| Tantalum | Yichun Jin Yang Rare Metal Co., Ltd. | CHINA | Yes |
| Tantalum | Zhuzhou Cemented Carbide | CHINA | Yes |
| Tin | Alpha | UNITED STATES | Yes |
| Tin | China Tin Group Co., Ltd. | CHINA | Yes |
| Tin | Cooperativa Metalurgica de Rondônia Ltda. | BRAZIL | Yes |
| Tin | CV Ayi Jaya | INDONESIA | Yes |
| Tin | CV Gita Pesona | INDONESIA | Yes |
| Tin | CV Serumpun Sebalai | INDONESIA | Yes |
| Tin | CV United Smelting | INDONESIA | Yes |
| Tin | CV Venus Inti Perkasa | INDONESIA | Yes |

| | | | |
|-----|--|---------------|-----|
| Tin | Dowa | JAPAN | Yes |
| Tin | Elmet S.L.U. (Metallo Group) | SPAIN | Yes |
| Tin | EM Vinto | BOLIVIA | Yes |
| Tin | Fenix Metals | POLAND | Yes |
| Tin | Gejiu Non-Ferrous Metal Processing Co., Ltd. | CHINA | Yes |
| Tin | Jiangxi Ketai Advanced Material Co., Ltd. | CHINA | Yes |
| Tin | Magnu's Minerais Metais e Ligas Ltda. | BRAZIL | Yes |
| Tin | Malaysia Smelting Corporation (MSC) | MALAYSIA | Yes |
| Tin | Melt Metais e Ligas S/A | BRAZIL | Yes |
| Tin | Metallic Resources, Inc. | UNITED STATES | Yes |
| Tin | Metallo-Chimique N.V. | BELGIUM | Yes |
| Tin | Mineração Taboca S.A. | BRAZIL | Yes |
| Tin | Minsur | PERU | Yes |
| Tin | Mitsubishi Materials Corporation | JAPAN | Yes |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd. | THAILAND | Yes |
| Tin | O.M. Manufacturing Philippines, Inc. | PHILIPPINES | Yes |
| Tin | Operaciones Metalurgical S.A. | BOLIVIA | Yes |
| Tin | PT Aries Kencana Sejahtera | INDONESIA | Yes |
| Tin | PT Artha Cipta Langgeng | INDONESIA | Yes |
| Tin | PT ATD Makmur Mandiri Jaya | INDONESIA | Yes |
| Tin | PT Babel Inti Perkasa | INDONESIA | Yes |
| Tin | PT Bangka Prima Tin | INDONESIA | Yes |
| Tin | PT Bangka Tin Industry | INDONESIA | Yes |
| Tin | PT Belitung Industri Sejahtera | INDONESIA | Yes |
| Tin | PT BilliTin Makmur Lestari | INDONESIA | Yes |
| Tin | PT Bukit Timah | INDONESIA | Yes |
| Tin | PT Cipta Persada Mulia | INDONESIA | Yes |
| Tin | PT DS Jaya Abadi | INDONESIA | Yes |
| Tin | PT Eunindo Usaha Mandiri | INDONESIA | Yes |
| Tin | PT Inti Stania Prima | INDONESIA | Yes |
| Tin | PT Justindo | INDONESIA | Yes |
| Tin | PT Mitra Stania Prima | INDONESIA | Yes |
| Tin | PT Panca Mega Persada | INDONESIA | Yes |
| Tin | PT Prima Timah Utama | INDONESIA | Yes |
| Tin | PT Refined Bangka Tin | INDONESIA | Yes |
| Tin | PT Sariwiguna Binasentosa | INDONESIA | Yes |
| Tin | PT Stanindo Inti Perkasa | INDONESIA | Yes |
| Tin | PT Sukses Inti Makmur | INDONESIA | Yes |
| Tin | PT Sumber Jaya Indah | INDONESIA | Yes |
| Tin | PT Timah (Persero) Tbk Kundur | INDONESIA | Yes |
| Tin | PT Timah (Persero) Tbk Mentok | INDONESIA | Yes |
| Tin | PT Tinindo Inter Nusa | INDONESIA | Yes |
| Tin | PT Tommy Utama | INDONESIA | Yes |
| Tin | PT Wahana Perkit Jaya | INDONESIA | Yes |
| Tin | Resind Indústria e Comércio Ltda. | BRAZIL | Yes |
| Tin | Rui Da Hung | TAIWAN | Yes |
| Tin | Soft Metais Ltda. | BRAZIL | Yes |
| Tin | Thaisarco | THAILAND | Yes |
| Tin | VQB Mineral and Trading Group JSC | VIET NAM | Yes |
| Tin | White Solder Metalurgia e Mineração Ltda. | BRAZIL | Yes |

| | | | |
|----------|---|--------------------|-----|
| Tin | Yunnan Tin Group (Holding) Company Limited | CHINA | Yes |
| Tungsten | A.L.M.T. TUNGSTEN Corp. | JAPAN | Yes |
| Tungsten | Asia Tungsten Products Vietnam Ltd. | VIET NAM | Yes |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd. | CHINA | Yes |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd. | CHINA | Yes |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd. | CHINA | Yes |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd. | CHINA | Yes |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd. | CHINA | Yes |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd. | CHINA | Yes |
| Tungsten | Ganzhou Yatai Tungsten Co., Ltd. | CHINA | Yes |
| Tungsten | Global Tungsten & Powders Corp. | UNITED STATES | Yes |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd. | CHINA | Yes |
| Tungsten | H.C. Starck GmbH | GERMANY | Yes |
| Tungsten | H.C. Starck Smelting GmbH & Co.KG | GERMANY | Yes |
| Tungsten | Hunan Chenzhou Mining Co., Ltd. | CHINA | Yes |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji | CHINA | Yes |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd. | CHINA | Yes |
| Tungsten | Hydrometallurg, JSC | RUSSIAN FEDERATION | Yes |
| Tungsten | Japan New Metals Co., Ltd. | JAPAN | Yes |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd. | CHINA | Yes |
| Tungsten | Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd. | CHINA | Yes |
| Tungsten | Kennametal Huntsville | UNITED STATES | Yes |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd. | CHINA | Yes |
| Tungsten | Niagara Refining LLC | UNITED STATES | Yes |
| Tungsten | Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC | VIET NAM | Yes |
| Tungsten | Philippine Chuangin Industrial Co., Inc. | PHILIPPINES | Yes |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd. | VIET NAM | Yes |
| Tungsten | Vietnam Youngsun Tungsten Industry Co., Ltd. | VIET NAM | Yes |
| Tungsten | Wolfram Bergbau und Hütten AG | AUSTRIA | Yes |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd. | CHINA | Yes |
| Tungsten | Xiamen Tungsten Co., Ltd. | CHINA | Yes |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd. | CHINA | Yes |

SMELTERS/REFINERS FROM EICC-GeSI LIST THAT ARE IN PROCESS OF GETTING CERTIFIED AS CONFLICT FREE FROM CFSI

| Metal | Known Smelters/Refiners from EICC-GeSI List (in process of getting certified as conflict-free) | Country of Origin | Conflict Free |
|--------------|---|--------------------------|----------------------|
| Gold | Advanced Chemical Company | UNITED STATES | In Process |
| Gold | Almalyk Mining and Metallurgical Complex (AMMC) | UZBEKISTAN | In Process |
| Gold | Cendres + Métaux SA | SWITZERLAND | In Process |
| Gold | Daejin Indus Co., Ltd. | REPUBLIC OF KOREA | In Process |
| Gold | Do Sung Corporation | REPUBLIC OF KOREA | In Process |
| Gold | Faggi Enrico S.p.A. | ITALY | In Process |
| Gold | Geib Refining Corporation | UNITED STATES | In Process |
| Gold | KGHM Polska MiedŹ Spó³ka Akcyjna | POLAND | In Process |
| Gold | Korea Zinc Co. Ltd. | REPUBLIC OF KOREA | In Process |

| | | | |
|----------|---|--------------------|------------|
| Gold | Metalor Technologies (Suzhou) Ltd. | CHINA | In Process |
| Gold | Navoi Mining and Metallurgical Combinat | UZBEKISTAN | In Process |
| Gold | Samduck Precious Metals | REPUBLIC OF KOREA | In Process |
| Gold | SAXONIA Edelmetalle GmbH | GERMANY | In Process |
| Gold | Torecom | REPUBLIC OF KOREA | In Process |
| Gold | WIELAND Edelmetalle GmbH | GERMANY | In Process |
| Tantalum | E.S.R. Electronics | UNITED STATES | In Process |
| Tin | An Thai Minerals Company Limited | VIET NAM | In Process |
| Tin | An Vinh Joint Stock Mineral Processing Company | VIET NAM | In Process |
| Tin | Chenzhou Yun Xiang mining limited liability company | CHINA | In Process |
| Tin | CV Dua Sekawan | INDONESIA | In Process |
| Tin | CV Tiga Sekawan | INDONESIA | In Process |
| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | VIET NAM | In Process |
| Tin | Gejiu Fengming Metalurgy Chemical Plant | CHINA | In Process |
| Tin | Gejiu Kai Meng Industry and Trade LLC | CHINA | In Process |
| Tin | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | CHINA | In Process |
| Tin | Guanyang Guida Nonferrous Metal Smelting Plant | CHINA | In Process |
| Tin | HuiChang Hill Tin Industry Co., Ltd. | CHINA | In Process |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company | VIET NAM | In Process |
| Tin | Phoenix Metal Ltd. | RWANDA | In Process |
| Tin | PT Karimun Mining | INDONESIA | In Process |
| Tin | PT Kijang Jaya Mandiri | INDONESIA | In Process |
| Tin | Tuyen Quang Non-Ferrous Metals Joint Stock Company | VIET NAM | In Process |
| Tin | Yunnan Chengfeng Non-ferrous Metals Co., Ltd. | CHINA | In Process |
| Tungsten | ACL Metais Eireli | BRAZIL | In Process |
| Tungsten | Dayu Jincheng Tungsten Industry Co., Ltd. | CHINA | In Process |
| Tungsten | Dayu Weiliang Tungsten Co., Ltd. | CHINA | In Process |
| Tungsten | Ganzhou Non-ferrous Metals Smelting Co., Ltd. | CHINA | In Process |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd. | CHINA | In Process |
| Tungsten | Jiangxi Dayu Longxintai Tungsten Co., Ltd. | CHINA | In Process |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | CHINA | In Process |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd. | CHINA | In Process |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd. | CHINA | In Process |
| Tungsten | Kennametal Fallon | UNITED STATES | In Process |
| Tungsten | Moliren Ltd | RUSSIAN FEDERATION | In Process |
| Tungsten | Pobedit, JSC | RUSSIAN FEDERATION | In Process |
| Tungsten | Woltech Korea Co., Ltd. | REPUBLIC OF KOREA | In Process |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd. | CHINA | In Process |

SMELTERS/REFINERS FROM EICC-GeSI LIST THAT ARE NOT CERTIFIED AS CONFLICT FREE FROM CFSI

| Metal | Known Smelters/Refiners from EICC-GeSI List (not conflict-free) | Country of Origin | Conflict Free |
|--------------|--|--------------------------|----------------------|
| Gold | Aktyubinsk Copper Company TOO | KAZAKHSTAN | No |
| Gold | Al Etihad Gold Refinery DMCC | UNITED ARAB EMIRATES | No |
| Gold | Atasay Kuyumculuk Sanayi Ve Ticaret A.S. | TURKEY | No |
| Gold | Bauer Walser AG | GERMANY | No |
| Gold | Caridad | MEXICO | No |
| Gold | Chugai Mining | JAPAN | No |
| Gold | Daye Non-Ferrous Metals Mining Ltd. | CHINA | No |
| Gold | Fidelity Printers and Refiners Ltd. | ZIMBABWE | No |
| Gold | Gansu Seemine Material Hi-Tech Co., Ltd. | CHINA | No |
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM | CHINA | No |
| Gold | Guangdong Jinding Gold Limited | CHINA | No |
| Gold | Guoda Safina High-Tech Environmental Refinery Co., Ltd. | CHINA | No |
| Gold | Hangzhou Fuchunjiang Smelting Co., Ltd. | CHINA | No |
| Gold | Hunan Chenzhou Mining Co., Ltd. | CHINA | No |
| Gold | Hwasung CJ Co., Ltd. | REPUBLIC OF KOREA | No |
| Gold | Kaloti Precious Metals | UNITED ARAB EMIRATES | No |
| Gold | Kazakhmys Smelting LLC | KAZAKHSTAN | No |
| Gold | Korea Metal Co., Ltd. | REPUBLIC OF KOREA | No |
| Gold | Kyrgyzaltyn JSC | KYRGYZSTAN | No |
| Gold | L'azurde Company For Jewelry | SAUDI ARABIA | No |
| Gold | Lingbao Gold Company Limited | CHINA | No |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd. | CHINA | No |
| Gold | Luoyang Zijin Yinhui Gold Refinery Co., Ltd. | CHINA | No |
| Gold | Metahub Industries Sdn. Bhd. | MALAYSIA | No |
| Gold | Morris and Watson | NEW ZEALAND | No |
| Gold | OJSC Kolyma Refinery | RUSSIAN FEDERATION | No |
| Gold | Penglai Penggang Gold Industry Co., Ltd. | CHINA | No |
| Gold | SAAMP | FRANCE | No |
| Gold | Sabin Metal Corp. | UNITED STATES | No |
| Gold | SAMWON Metals Corp. | REPUBLIC OF KOREA | No |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | CHINA | No |
| Gold | So Accurate Group, Inc. | UNITED STATES | No |
| Gold | Sudan Gold Refinery | SUDAN | No |
| Gold | Tongling Nonferrous Metals Group Co., Ltd. | CHINA | No |
| Gold | Tony Goetz NV | BELGIUM | No |
| Gold | Yunnan Copper Industry Co., Ltd. | CHINA | No |
| Tantalum | Avon Specialty Metals Ltd | UNITED KINGDOM | No |
| Tantalum | Guizhou Zhenhua Xinyun Technology Ltd., Kaili branch | CHINA | No |
| Tin | CNMC (Guangxi) PGMA Co., Ltd. | CHINA | No |
| Tin | Estanho de Rondônia S.A. | BRAZIL | No |
| Tin | Feinhütte Halsbrücke GmbH | GERMANY | No |
| Tin | Gejiu Zili Mining And Metallurgy Co., Ltd. | CHINA | No |
| Tin | Huichang Jinshunda Tin Co., Ltd. | CHINA | No |

| | | | |
|----------|---|-----------|----|
| Tin | Linwu Xianggui Ore Smelting Co., Ltd. | CHINA | No |
| Tin | Metahub Industries Sdn. Bhd. | MALAYSIA | No |
| Tin | Nankang Nanshan Tin Manufactory Co., Ltd. | CHINA | No |
| Tin | PT Alam Lestari Kencana | INDONESIA | No |
| Tin | PT Bangka Kudai Tin | INDONESIA | No |
| Tin | PT Bangka Timah Utama Sejahtera | INDONESIA | No |
| Tin | PT Fang Di MulTindo | INDONESIA | No |
| Tin | PT Pelat Timah Nusantara Tbk | INDONESIA | No |
| Tin | PT Seirama Tin Investment | INDONESIA | No |
| Tin | PT Tirus Putra Mandiri | INDONESIA | No |
| Tungsten | Ganxian Shirui New Material Co., Ltd. | CHINA | No |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Yanglin | CHINA | No |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. | CHINA | No |
| Tungsten | Sanher Tungsten Vietnam Co., Ltd. | VIET NAM | No |