

United States
Securities and Exchange Commission
Washington, D.C. 20549

FORM SD
SPECIALIZED DISCLOSURE REPORT

Michael Kors Holdings Limited
(Exact name of registrant as specified in its charter)

British Virgin Islands
(State or other jurisdiction of incorporation or organization)

001-35368
(Commission
File Number)

N/A
(IRS Employer Identification No.)

33 Kingsway
London, United Kingdom
WC2B 6UF
(Address of principal executive offices)

N/A
(Zip Code)

Lee S. Sporn
Senior Vice President, Business Affairs and General Counsel
(212) 201-8300
(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, 2015.

Section 1 – Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

As required by Rule 13p-1 under the Securities Exchange Act of 1934, as amended, and Form SD, a Conflict Minerals Report is provided as an exhibit to this Form SD and is available on the Investors page of our Internet website at: <http://www.michaelkors.com>.

The information contained on our website is not incorporated by reference into this Form SD or our Conflict Minerals Report and should not be considered part of this Form SD or the Conflict Minerals Report.

Item 1.02 Exhibit

The Conflict Minerals Report required by Item 1.01 is filed as Exhibit 1.01 to this Form SD.

Section 2 – Exhibits

Item 2.01 Exhibits

Exhibit 1.01 – Conflict Minerals Report for the calendar year ended December 31, 2015.

SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

MICHAEL KORS HOLDINGS LIMITED
(Registrant)

By: /s/ Joseph B. Parsons _____ May 31, 2016
Name: Joseph B. Parsons
Title: Executive Vice President,
Chief Financial Officer,
Chief Operating Officer
and Treasurer

EXHIBIT INDEX

Exhibit **Description**

1.01 Conflict Minerals Report for the calendar year ended December 31, 2015.

Conflict Minerals Report

Michael Kors Holdings Limited has included this Conflict Minerals Report as an exhibit to its Form SD in respect of calendar 2015 as required by Rule 13p-1 under the Securities Exchange Act of 1934, as amended, and Form SD (collectively, the "Conflict Minerals Rule"). The date of filing of this Conflict Minerals Report is May 31, 2016.

Unless the context indicates otherwise, the terms "we," "its," "us," "our" and the "Company" refer to Michael Kors Holdings Limited and its consolidated subsidiaries. As used herein, "Conflict Minerals" or "3TG" are cassiterite (tin), columbite-tantalite (tantalum), gold and wolframite (tungsten), without regard to the location of origin of the minerals or derivative metals.

Forward-Looking Statements

The statements in this document that refer to plans and expectations for future periods are forward-looking statements within the meaning of federal securities laws. These forward-looking statements are based on management's current expectations. Words such as "expects," "anticipates," "plans," "believes," "estimates," "may," "will," "should" and variations of such words and similar expressions are intended to identify such forward-looking statements. Examples of forward-looking statements include, but are not limited to, statements concerning the additional steps that we intend to take to mitigate the risk that our necessary 3TG benefit armed groups. You should not place undue reliance on such statements. These forward-looking statements are subject to a number of risks and uncertainties, many of which are beyond the Company's control, which could cause the Company's actual results to differ materially from those indicated in these forward-looking statements. These risks and uncertainties may include, but are not limited to, the continued implementation of satisfactory traceability and other compliance measures by our direct and indirect suppliers, on a timely basis or at all, whether smelters and refiners and other market participants responsibly source 3TG and political and regulatory developments, whether in the Democratic Republic of the Congo ("DRC") region, the United States or elsewhere. The Company undertakes no obligation to update or revise any forward-looking statements to reflect subsequent events or circumstances, except as required by applicable laws or regulations.

Applicability of the Conflict Minerals Rule to Our Company

We are a global luxury lifestyle brand that contracts to manufacture accessories, primarily handbags and small leather goods, footwear, apparel, including womenswear, menswear, swimwear and outerwear, as well as watches, jewelry, eyewear, fragrance and beauty products. We believe that we are subject to the Conflict Minerals Rule because some of the products that we contract to manufacture may contain 3TG that are necessary to the functionality or production of such products. In-scope product information in respect of calendar 2015 is provided under "Product Information" below.

Through the efforts described in this Conflict Minerals Report, we seek to ensure that our sourcing practices are consistent with our Conflict Minerals Policy, which is described below. We do not directly manufacture products. We contract to manufacture products, and therefore we do not directly source 3TG from mines, smelters or refiners, and are many levels removed from these market participants. The efforts undertaken to identify the origin of 3TG in our products reflect our circumstances and position in the supply chain, and we work with our direct suppliers so that they may provide us with accurate information about the origin of necessary 3TG minerals in the products that we contract to manufacture.

Our Conflict Minerals Policy

We are opposed to human rights abuses such as those that are occurring in connection with the mining of certain minerals from locations in the DRC. We also take our obligations under Securities and Exchange Commission regulations and the laws in countries in which we operate seriously, including our compliance obligations under the Conflict Minerals Rule. In addition, we are committed to principles of ethical business practice and recognition of the dignity of others, including the responsible sourcing of 3TG, and we expect that our suppliers share this commitment.

In furtherance of the foregoing, we have adopted and communicated to our suppliers and the public a company policy (the "Conflict Minerals Policy") for determining the use and origin of 3TG in our supply chain. Our Conflict Minerals Policy is available at: <http://investors.michaelkors.com/resources/conflict-materials/default.aspx>.

The Conflict Minerals Policy includes, but is not limited to, our expectations that our suppliers:

1. Put in place procedures for the traceability of 3TG;
2. Cooperate with our 3TG due diligence process, including by providing us, from time to time, with written certifications and other information concerning the origin of 3TG included in products and/or components supplied to us;
3. Maintain reviewable records supporting the source of 3TG;
4. Adopt policies and procedures with respect to 3TG consistent with our Conflict Minerals Policy and the Organisation for Economic Co-operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including the adoption of a risk mitigation strategy to respond to identified risks in the supply chain, and communicate such policies and procedures to their personnel and direct and indirect suppliers; and
5. Require their direct and indirect suppliers to adopt policies and procedures that are consistent with our Conflict Minerals Policy.

We do not support the embargoing of 3TG from the DRC region, but rather encourage our suppliers to continue to source responsibly from the region.

Reasonable Country of Origin Inquiry

As required by the Conflict Minerals Rule, for calendar 2015, we conducted a "reasonable country of origin inquiry" ("RCOI"). We designed our RCOI in good faith to determine the origin of 3TG that are necessary to the functionality or production of products that we contract to manufacture. The results of our RCOI are discussed on Annex A to this Conflict Minerals Report. To the extent applicable, for our RCOI, we utilized the same processes and procedures as for our due diligence, particularly Steps 1 and 2 of the OECD Guidance (as defined below) design framework, which are described below in this Conflict Minerals Report.

Our outreach included 168 suppliers (the "Suppliers"). We determined which of our products were in-scope or potentially in-scope for purposes of the Conflict Minerals Rule through product specifications, visual inspection, supplier inquiries and other information known to us. We also considered the degree of influence that we exercised over the materials, parts and components of the products.

Pursuant to the Conflict Minerals Rule, based on the results of our RCOI, we were required to conduct due diligence for calendar 2015. These due diligence efforts are discussed below.

Due Diligence Program Design

Design Framework

We designed our due diligence measures relating to 3TG to conform with, in all material respects, the criteria set forth in the Organisation for Economic Co-operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including the Supplement on Tin, Tantalum and Tungsten and the Supplement on Gold (collectively, the "OECD Guidance").

Selected Elements of Design Framework

The OECD Guidance has established a five-step framework for due diligence as a basis for responsible global supply chain management of minerals from conflict-affected and high-risk areas. Selected elements of our program design are discussed below. However, these are not all of the discrete elements of the program that we have put in place to provide for the responsible sourcing of 3TG contained in our products. The headings below conform to the headings used in the OECD Guidance for each of the five steps. Selected due diligence measures that we took in respect of calendar 2015 are discussed under "Due Diligence Program Execution."

1. OECD Guidance Step One: "Establish strong company management systems"

- a. We have a Conflict Minerals Policy, as described earlier in this Conflict Minerals Report. The Conflict Minerals Policy is communicated internally by email and Intranet. The Conflict Minerals Policy also is communicated by email to suppliers and is posted on our website.
- b. We have a team of senior staff under the General Counsel charged with managing our 3TG compliance program. The following functional areas are represented on the working group: Internal Audit; Legal; Production/Licensing; and Trade and Customs. Appropriate members of these functional areas are educated on the Conflict Minerals Rule, the OECD Guidance, our compliance plan and the procedures for reviewing and validating supplier responses to our inquiries.
- c. We have a Standard Operating Procedure that contains standard processes, timelines and communications for our compliance with the Conflict Minerals Rule.
- d. We utilize the Conflict Minerals Reporting Template (the "CMRT") developed by the Conflict-Free Sourcing Initiative (the "CFSI") to identify smelters and refiners in our supply chain.
- e. Supplier requests for a completed CMRT are accompanied by the Conflict Minerals Policy or include a link to the policy.
- f. We consider on an ongoing basis whether suppliers may benefit from receiving training or orientation materials concerning the Conflict Minerals Rule, the OECD Guidance, the Conflict Minerals Policy and/or our survey process. If so, we either arrange for the supplier to receive those materials or recommend third-party training or informational resources to the supplier.
- g. We maintain records relating to 3TG due diligence, including records of due diligence processes, findings and resulting decisions, in an electronic database. Our policy is to maintain these records for at least five years.
- h. We have an anonymous email mailbox for employees, suppliers and other interested parties to report violations of our Conflict Minerals Policy. The email address is conflictmineralscompliance@michaelkors.com. The North American hotline through which parties may report violations is 1-855-224-4261.

2. OECD Guidance Step Two: "Identify and assess risk in the supply chain"

- a. We request by email that suppliers provide us with information, through the completion of a CMRT, concerning the usage and source of 3TG in their products as well as their related compliance efforts. We follow up by email or phone with all suppliers that do not respond to the request within the specified time frame.
- b. We review the completed responses received from the suppliers for completeness, accuracy, reasonableness, credibility and "red flags" using written guidelines that we have developed. We follow up by email or phone with suppliers that submit a response that is rejected under our written guidelines, requesting the supplier to submit an updated or corrected CMRT.
- c. Smelter and refiner information provided by suppliers is reviewed against the Smelter Reference List tab of the CMRT and the list of known processing facilities published by the U.S. Department of Commerce. To the extent that a smelter or refiner identified by a supplier is not on either of these lists, we take additional steps to attempt to determine whether the listed entity is a smelter or refiner.
- d. Smelter and refiner information also is reviewed against the lists of "compliant" and "active" smelters and refiners published by the CFSI. To the extent that a smelter or refiner identified by a supplier is not listed as compliant by the CFSI, we request further information from the supplier, consult publicly available information or attempt to contact the smelter or refiner to determine whether it obtained 3TG from sources that directly or indirectly financed or benefitted armed groups in the DRC or an adjoining country.

3. OECD Guidance Step Three: "Design and implement a strategy to respond to identified risks"

- a. Our 3TG compliance team reports the findings of its supply chain risk assessment to senior personnel in our Legal Department.
- b. If our due diligence does not result in a reasonable belief that the applicable 3TG originated outside of the DRC region or came from recycled or scrap sources, we assess the risk that the 3TG may benefit armed groups in the DRC region.

- c. Under our written procedures, risk mitigation measures include escalation of the supplier inquiry process, working with the supplier to establish a corrective action plan and possible termination of the supplier relationship.
- d. We annually assess whether our 3TG processes conform to our applicable written procedures and assess the compliance program against other specified measures and metrics.

4. OECD Guidance Step Four: "Carry out independent third-party audit of supply chain due diligence at identified points in the supply chain"

To that extent that smelters or refiners of 3TG in our supply chain are identified to us, we utilize information made available by the CFSI concerning independent third-party audits of smelters and refiners.

5. OECD Guidance Step 5 : "Report on supply chain due diligence"

We file a Form SD, and to the extent applicable a Conflict Minerals Report, with the Securities and Exchange Commission and make these documents available on our website.

Due Diligence Program Execution

In furtherance of our 3TG due diligence in respect of calendar 2015, we performed the following due diligence measures. These were not all of the measures that we took in furtherance of our 3TG compliance program or pursuant to the Conflict Minerals Rule and the OECD Guidance. See "Due Diligence Program Design" for a discussion of selected elements of our design framework, which included many other items that are part of our compliance program.

- 1. We sent requests to 168 Suppliers to provide us with a completed CMRT. We requested that the Suppliers furnish us with a completed template at the product level. We followed up by email or phone with the Suppliers that did not provide a response within the time frame specified in the request. We received responses from 78% of the Suppliers.
- 2. We reviewed the completed responses received from the Suppliers for completeness, accuracy, reasonableness, credibility and "red flags" using the written guidelines that we developed. We then followed up with selected Suppliers as we determined to be appropriate based on the content of the responses.

3. Our 3TG compliance team reported the findings of its compliance efforts in respect of calendar 2015 to senior personnel in our Legal Department.
4. We arranged for our Suppliers to receive additional training materials concerning the Conflict Minerals Rule, which we believe contributed to an increase in the response rate for 2015 as compared to 2014, as well as our improvement in the quality of the responses received.

Product Information; Identified Smelters and Refiners

For calendar 2015, the following categories of products were potentially in-scope: accessories, including handbags and small leather goods, footwear, apparel, including womenswear, menswear, swimwear and outerwear, as well as watches, jewelry, eyewear, fragrance and beauty products, in each case to the extent these products include tin, tantalum, tungsten and/or gold that is necessary to their functionality or production.

For a further discussion of our products, see our Annual Report on Form 10-K for the fiscal year ended March 28, 2015 (the "Annual Report"). The information contained in our Annual Report is not incorporated by reference into our Form SD or this Conflict Minerals Report and should not be considered part of this report or the Form SD.

We endeavored to determine the mine or location of origin of the 3TG contained in our in-scope products by requesting that the Suppliers provide us with a completed CMRT at the product level and through the other measures described in this Conflict Minerals Report.

In connection with our RCOI or due diligence, as applicable, the Suppliers identified to us the facilities listed on Appendix A as potentially having processed the necessary 3TG contained in our potentially in-scope products for 2015. Due to our position in the supply chain, we rely on our suppliers for accurate smelter and refiner information. Our due diligence measures can not provide absolute certainty regarding the source and chain of custody of the necessary 3TG contained in our 2015 potentially in-scope products.

The table below presents a summary of the smelter and refiner information contained in Annex A. Of the 283 smelters and refiners identified to us by our Suppliers, 276 were identified only by a single Supplier that manufactures watches and jewelry for us. That Supplier provided smelter and refiner information relating to all of the products it manufactures, not just those products manufactured for us. Please see the notes accompanying Annex A for additional information relevant to the table below.

| | <u>Compliant</u> | <u>Active</u> | <u>On Reference List Only</u> |
|-----------------|------------------|---------------|-------------------------------|
| Tantalum | 46 | 0 | 1 |
| Tin | 59 | 10 | 8 |
| Tungsten | 26 | 8 | 2 |
| Gold | 79 | 13 | 31 |

Additional Risk Mitigation Efforts

We intend to take the following additional steps in respect of calendar 2016 to mitigate the risk that our necessary in-scope 3TG benefit armed groups:

1. Have our internal audit function perform procedures to attest that our internal controls relating to 3TG are being followed.
2. Encourage Suppliers that provided company level information for calendar 2015 to provide product level information for calendar 2016 through ongoing outreach with these Suppliers.

3. Engage with Suppliers that provided incomplete responses or that did not provide responses for calendar 2015 to provide requested information for calendar 2016.
4. Provide additional training to selected suppliers.
5. Monitor and encourage the continuing development and progress of traceability measures at Suppliers that indicated for calendar 2015 that the source of 3TG was unknown or undeterminable.
6. Communicate to new potentially in-scope suppliers our sourcing expectations, including through the dissemination of the Conflict Minerals Policy to them. In addition, as new in-scope suppliers are added, work with these suppliers to ensure that they understand the requirements of our Conflict Minerals Policy, the Conflict Minerals Rule and the OECD Guidance.
7. Participate in selected industry initiatives to identify smelters and refiners in the supply chain.

All of the foregoing steps are in addition to the steps that we took in respect of our calendar 2015 inquiry, which we intend to continue to take in respect of our calendar 2016 inquiry to the extent applicable.

Annex A

Capitalized terms used and not otherwise defined in this Annex have the meanings indicated in our Conflict Minerals Report.

In connection with our RCOI or due diligence, as applicable, our Suppliers identified to us the smelters and refiners listed below as potentially having processed the necessary 3TG contained in our potentially in-scope products in 2015. As noted earlier in this Conflict Minerals Report, a single Supplier reported 276 of the 283 smelters and refiners listed below. That Supplier reported at a company level. Accordingly, a significant number of the smelters and refiners on this list may not have processed 3TG that is in products that we contracted to manufacture.

| Metal | Smelter or Refiner | Country Location | Status |
|--------------|---|-------------------------|---------------|
| Gold | Aida Chemical Industries Co. Ltd. | JAPAN | Compliant |
| Gold | Allgemeine Gold-und Silberscheideanstalt A.G. | GERMANY | Compliant |
| Gold | AngloGold Ashanti Córrego do Sítio Mineração | BRAZIL | Compliant |
| Gold | Argor-Heraeus S.A. | SWITZERLAND | Compliant |
| Gold | Asahi Pretec Corporation | JAPAN | Compliant |
| Gold | Asahi Refining Canada Ltd. | CANADA | Compliant |
| Gold | Asahi Refining USA Inc. | UNITED STATES | Compliant |
| Gold | Asaka Riken Co Ltd | JAPAN | Compliant |
| Gold | Aurubis AG | GERMANY | Compliant |
| Gold | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | PHILIPPINES | Compliant |
| Gold | Boliden AB | SWEDEN | Compliant |
| Gold | C. Hafner GmbH + Co. KG | GERMANY | Compliant |
| Gold | CCR Refinery – Glencore Canada Corporation | CANADA | Compliant |
| Gold | Chimet S.p.A. | ITALY | Compliant |
| Gold | DODUCO GmbH | GERMANY | Compliant |
| Gold | Dowa | JAPAN | Compliant |
| Gold | Eco-System Recycling Co., Ltd. | JAPAN | Compliant |
| Gold | Elemental Refining, LLC | UNITED STATES | Compliant |
| Gold | Heimerle + Meule GmbH | GERMANY | Compliant |
| Gold | Heraeus Ltd. Hong Kong | CHINA | Compliant |
| Gold | Heraeus Precious Metals GmbH & Co. KG | GERMANY | Compliant |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Company Limited | CHINA | Compliant |
| Gold | Ishifuku Metal Industry Co., Ltd. | JAPAN | Compliant |
| Gold | Istanbul Gold Refinery | TURKEY | Compliant |
| Gold | Japan Mint | JAPAN | Compliant |
| Gold | Jiangxi Copper Company Limited | CHINA | Compliant |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant | RUSSIAN FEDERATION | Compliant |
| Gold | JSC Uralelectromed | RUSSIAN FEDERATION | Compliant |

| | | | |
|------|--|--------------------|-----------|
| Gold | JX Nippon Mining & Metals Co., Ltd. | JAPAN | Compliant |
| Gold | Kennecott Utah Copper LLC | UNITED STATES | Compliant |
| Gold | Kojima Chemicals Co., Ltd | JAPAN | Compliant |
| Gold | LS-NIKKO Copper Inc. | KOREA, REPUBLIC OF | Compliant |
| Gold | Materion | UNITED STATES | Compliant |
| Gold | Matsuda Sangyo Co., Ltd. | JAPAN | Compliant |
| Gold | Metalor Technologies (Hong Kong) Ltd | HONG KONG | Compliant |
| Gold | Metalor Technologies (Singapore) Pte. Ltd. | SINGAPORE | Compliant |
| Gold | Metalor Technologies S.A. | SWITZERLAND | Compliant |
| Gold | Metalor USA Refining Corporation | UNITED STATES | Compliant |
| Gold | Metalúrgica Met-Mex Peñoles S.A. De C.V. | MEXICO | Compliant |
| Gold | Mitsubishi Materials Corporation | JAPAN | Compliant |
| Gold | Mitsui Mining and Smelting Co., Ltd. | JAPAN | Compliant |
| Gold | MMTC-PAMP India Pvt., Ltd. | INDIA | Compliant |
| Gold | Moscow Special Alloys Processing Plant | RUSSIAN FEDERATION | Compliant |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.Ş. | TURKEY | Compliant |
| Gold | Nihon Material Co. LTD | JAPAN | Compliant |
| Gold | Ögussa Österreichische Gold- und Silber-Scheideanstalt GmbH | AUSTRIA | Compliant |
| Gold | Ohura Precious Metal Industry Co., Ltd. | JAPAN | Compliant |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastvetmet) | RUSSIAN FEDERATION | Compliant |
| Gold | PAMP SA | SWITZERLAND | Compliant |
| Gold | Prioksky Plant of Non-Ferrous Metals | RUSSIAN FEDERATION | Compliant |
| Gold | PT Aneka Tambang (Persero) Tbk | INDONESIA | Compliant |
| Gold | PX Précinox SA | SWITZERLAND | Compliant |
| Gold | Rand Refinery (Pty) Ltd | SOUTH AFRICA | Compliant |
| Gold | Republic Metals Corporation | UNITED STATES | Compliant |
| Gold | Royal Canadian Mint | CANADA | Compliant |
| Gold | Schone Edelmetaal | NETHERLANDS | Compliant |
| Gold | SEMPSA Joyeria Plateria SA | SPAIN | Compliant |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co. Ltd | CHINA | Compliant |
| Gold | Sichuan Tianze Precious Metals Co., Ltd. | CHINA | Compliant |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals | RUSSIAN FEDERATION | Compliant |
| Gold | Solar Applied Materials Technology Corp. | TAIWAN | Compliant |
| Gold | Sumitomo Metal Mining Co., Ltd. | JAPAN | Compliant |
| Gold | T.C.A S.p.A | ITALY | Compliant |
| Gold | Tanaka Kikinzoku Kogyo K.K. | JAPAN | Compliant |
| Gold | The Refinery of Shandong Gold Mining Co Ltd | CHINA | Compliant |
| Gold | Tokuriki Honten Co., Ltd | JAPAN | Compliant |
| Gold | Umicore Brasil Ltda | BRAZIL | Compliant |

| | | | |
|------|---|----------------------|------------------------|
| Gold | Umicore SA Business Unit Precious Metals Refining | BELGIUM | Compliant |
| Gold | United Precious Metal Refining, Inc. | UNITED STATES | Compliant |
| Gold | Valcambi S.A. | SWITZERLAND | Compliant |
| Gold | Western Australian Mint trading as The Perth Mint | AUSTRALIA | Compliant |
| Gold | YAMAMOTO PRECIOUS METAL CO., LTD. | JAPAN | Compliant |
| Gold | Yokohama Metal Co Ltd | JAPAN | Compliant |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | CHINA | Compliant |
| Gold | Kazzinc Ltd | KAZAKHSTAN | Compliant |
| Gold | OJSC Novosibirsk Refinery | RUSSIAN FEDERATION | Compliant |
| Gold | Singway Technology Co., Ltd. | TAIWAN | Compliant |
| Gold | Umicore Precious Metals Thailand | THAILAND | Compliant |
| Gold | Zijin Mining Group Co., Ltd. Gold Refinery | CHINA | Compliant |
| Gold | Advanced Chemical Company | UNITED STATES | Active |
| Gold | Almalyk Mining and Metallurgical Complex (AMMC) | UZBEKISTAN | Active |
| Gold | Cendres + Métaux S.A. | SWITZERLAND | Active |
| Gold | Daejin Indus Co., Ltd. | KOREA, REPUBLIC OF | Active |
| Gold | DSC (Do Sung Corporation) | KOREA, REPUBLIC OF | Active |
| Gold | Faggi Enrico S.p.A. | ITALY | Active |
| Gold | Geib Refining Corporation | UNITED STATES | Active |
| Gold | KGHM Polska Miedź Spółka Akcyjna | POLAND | Active |
| Gold | Metalor Technologies (Suzhou) Ltd. | CHINA | Active |
| Gold | Navoi Mining and Metallurgical Combinat | UZBEKISTAN | Active |
| Gold | Samduck Precious Metals | KOREA, REPUBLIC OF | Active |
| Gold | Torecom | KOREA, REPUBLIC OF | Active |
| Gold | WIELAND Edelmetalle GmbH | GERMANY | Active |
| Gold | Al Etihad Gold Refinery DMCC | UNITED ARAB EMIRATES | On Reference List Only |
| Gold | Atasay Kuyumculuk Sanayi Ve Ticaret A.S. | TURKEY | On Reference List Only |
| Gold | Bangalore Refinery Ltd. | INDIA | On Reference List Only |
| Gold | Caridad | MEXICO | On Reference List Only |
| Gold | China National Gold Group Corporation | CHINA | On Reference List Only |
| Gold | Chugai Mining | JAPAN | On Reference List Only |
| Gold | Codelco | CHILE | On Reference List Only |
| Gold | Daye Non-Ferrous Metals Mining Ltd. | CHINA | On Reference List Only |
| Gold | Gansu Seemine Material Hi-Tech Co., Ltd. | CHINA | On Reference List Only |
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM | CHINA | On Reference List Only |
| Gold | Guangdong Jinding Gold Limited | CHINA | On Reference List Only |
| Gold | Guoda Safina High-Tech Environmental Refinery Co., Ltd. | CHINA | On Reference List Only |
| Gold | Hangzhou Fuchunjiang Smelting Co., Ltd. | CHINA | On Reference List Only |
| Gold | Hunan Chenzhou Mining Industry Group | CHINA | On Reference List Only |
| Gold | Hwasung CJ Co., Ltd. | KOREA, REPUBLIC OF | On Reference List Only |

| | | | |
|----------|---|--------------------|------------------------|
| Gold | Johnson Matthey | SWITZERLAND | On Reference List Only |
| Gold | Kazakhmys Smelting LLC | KAZAKHSTAN | On Reference List Only |
| Gold | Korea Metal Co. Ltd | KOREA, REPUBLIC OF | On Reference List Only |
| Gold | Kyrgyzaltyn JSC | KYRGYZSTAN | On Reference List Only |
| Gold | L'azurde Company For Jewelry | SAUDI ARABIA | On Reference List Only |
| Gold | Lingbao Gold Company Limited | CHINA | On Reference List Only |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd. | CHINA | On Reference List Only |
| Gold | Luoyang Zijin Yinhuai Gold Refinery Co., Ltd. | CHINA | On Reference List Only |
| Gold | Morris and Watson | NEW ZEALAND | On Reference List Only |
| Gold | Penglai Penggang Gold Industry Co., Ltd. | CHINA | On Reference List Only |
| Gold | Sabin Metal Corp. | UNITED STATES | On Reference List Only |
| Gold | SAMWON METALS Corp. | KOREA, REPUBLIC OF | On Reference List Only |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | CHINA | On Reference List Only |
| Gold | So Accurate Group, Inc. | UNITED STATES | On Reference List Only |
| Gold | Tongling nonferrous Metals Group Co.,Ltd | CHINA | On Reference List Only |
| Gold | Yunnan Copper Industry Co Ltd | CHINA | On Reference List Only |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd. | CHINA | Compliant |
| Tantalum | Conghua Tantalum and Niobium Smeltry | CHINA | Compliant |
| Tantalum | D Block Metals, LLC | UNITED STATES | Compliant |
| Tantalum | Duoluoshan | CHINA | Compliant |
| Tantalum | Exotech Inc. | UNITED STATES | Compliant |
| Tantalum | F&X Electro-Materials Ltd. | CHINA | Compliant |
| Tantalum | FIR Metals & Resource Ltd. | CHINA | Compliant |
| Tantalum | Global Advanced Metals | UNITED STATES | Compliant |
| Tantalum | Global Advanced Metals Aizu | JAPAN | Compliant |
| Tantalum | Global Advanced Metals Boyertown | UNITED STATES | Compliant |
| Tantalum | Guangdong Zhiyuan New Material Co., Ltd. | CHINA | Compliant |
| Tantalum | H.C. Starck Co., Ltd. | THAILAND | Compliant |
| Tantalum | H.C. Starck GmbH Goslar | GERMANY | Compliant |
| Tantalum | H.C. Starck GmbH Laufenburg | GERMANY | Compliant |
| Tantalum | H.C. Starck Hermsdorf GmbH | GERMANY | Compliant |
| Tantalum | H.C. Starck Inc. | UNITED STATES | Compliant |
| Tantalum | H.C. Starck Ltd. | JAPAN | Compliant |
| Tantalum | H.C. Starck Smelting GmbH & Co.KG | GERMANY | Compliant |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd. | CHINA | Compliant |
| Tantalum | Hi-Temp Specialty Metals, Inc. | UNITED STATES | Compliant |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd. | CHINA | Compliant |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd. | CHINA | Compliant |
| Tantalum | Jiujiang Tanbre Co., Ltd. | CHINA | Compliant |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd. | CHINA | Compliant |
| Tantalum | KEMET Blue Metals | MEXICO | Compliant |
| Tantalum | KEMET Blue Powder | UNITED STATES | Compliant |

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| Tantalum | King-Tan Tantalum Industry Ltd. | CHINA | Compliant |
| Tantalum | LSM Brasil S.A. | BRAZIL | Compliant |
| Tantalum | Metallurgical Products India Pvt., Ltd. | INDIA | Compliant |
| Tantalum | Mineração Taboca S.A. | BRAZIL | Compliant |
| Tantalum | Mitsui Mining & Smelting | JAPAN | Compliant |
| Tantalum | Molycorp Silmet A.S. | ESTONIA | Compliant |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd. | CHINA | Compliant |
| Tantalum | Plansee SE Liezen | AUSTRIA | Compliant |
| Tantalum | Plansee SE Reutte | AUSTRIA | Compliant |
| Tantalum | QuantumClean | UNITED STATES | Compliant |
| Tantalum | Resind Indústria e Comércio Ltda. | BRAZIL | Compliant |
| Tantalum | RFH Tantalum Smeltry Co., Ltd. | CHINA | Compliant |
| Tantalum | Solikamsk Magnesium Works OAO | RUSSIAN FEDERATION | Compliant |
| Tantalum | Taki Chemicals | JAPAN | Compliant |
| Tantalum | Telex | UNITED STATES | Compliant |
| Tantalum | Tranzact, Inc. | UNITED STATES | Compliant |
| Tantalum | Ulba Metallurgical Plant JSC | KAZAKHSTAN | Compliant |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd. | CHINA | Compliant |
| Tantalum | Yichun Jin Yang Rare Metal Co., Ltd. | CHINA | Compliant |
| Tantalum | Zhuzhou Cemented Carbide | CHINA | Compliant |
| Tantalum | Plansee | AUSTRIA | On Reference List Only |
| Tin | Alpha | UNITED STATES | Compliant |
| Tin | China Tin Group Co., Ltd. | CHINA | Compliant |
| Tin | Cooperativa Metalurgica de Rondônia Ltda. | BRAZIL | Compliant |
| Tin | CV Ayi Jaya | INDONESIA | Compliant |
| Tin | CV Gita Pesona | INDONESIA | Compliant |
| Tin | CV Serumpun Sebalai | INDONESIA | Compliant |
| Tin | CV United Smelting | INDONESIA | Compliant |
| Tin | CV Venus Inti Perkasa | INDONESIA | Compliant |
| Tin | Dowa | JAPAN | Compliant |
| Tin | Elmet S.L.U. (Metallo Group) | SPAIN | Compliant |
| Tin | EM Vinto | BOLIVIA | Compliant |
| Tin | Fenix Metals | POLAND | Compliant |
| Tin | Gejiu Non-Ferrous Metal Processing Co., Ltd. | CHINA | Compliant |
| Tin | Jiangxi Ketai Advanced Material Co., Ltd. | CHINA | Compliant |
| Tin | Magnu's Minerais Metais e Ligas Ltda. | BRAZIL | Compliant |
| Tin | Malaysia Smelting Corporation (MSC) | MALAYSIA | Compliant |
| Tin | Melt Metais e Ligas S/A | BRAZIL | Compliant |
| Tin | Metallic Resources, Inc. | UNITED STATES | Compliant |
| Tin | Metallo-Chimique N.V. | BELGIUM | Compliant |
| Tin | Mineração Taboca S.A. | BRAZIL | Compliant |
| Tin | Minsur | PERU | Compliant |
| Tin | Mitsubishi Materials Corporation | JAPAN | Compliant |

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| Tin | O.M. Manufacturing (Thailand) Co., Ltd. | THAILAND | Compliant |
| Tin | O.M. Manufacturing Philippines, Inc. | PHILIPPINES | Compliant |
| Tin | Operaciones Metalurgical S.A. | BOLIVIA | Compliant |
| Tin | PT Aries Kencana Sejahtera | INDONESIA | Compliant |
| Tin | PT Artha Cipta Langgeng | INDONESIA | Compliant |
| Tin | PT ATD Makmur Mandiri Jaya | INDONESIA | Compliant |
| Tin | PT Babel Inti Perkasa | INDONESIA | Compliant |
| Tin | PT Bangka Prima Tin | INDONESIA | Compliant |
| Tin | PT Bangka Tin Industry | INDONESIA | Compliant |
| Tin | PT Belitung Industri Sejahtera | INDONESIA | Compliant |
| Tin | PT BilliTin Makmur Lestari | INDONESIA | Compliant |
| Tin | PT Bukit Timah | INDONESIA | Compliant |
| Tin | PT Cipta Persada Mulia | INDONESIA | Compliant |
| Tin | PT DS Jaya Abadi | INDONESIA | Compliant |
| Tin | PT Eunindo Usaha Mandiri | INDONESIA | Compliant |
| Tin | PT Inti Stania Prima | INDONESIA | Compliant |
| Tin | PT Justindo | INDONESIA | Compliant |
| Tin | PT Mitra Stania Prima | INDONESIA | Compliant |
| Tin | PT Panca Mega Persada | INDONESIA | Compliant |
| Tin | PT Prima Timah Utama | INDONESIA | Compliant |
| Tin | PT Refined Bangka Tin | INDONESIA | Compliant |
| Tin | PT Sariwiguna Binasentosa | INDONESIA | Compliant |
| Tin | PT Stanindo Inti Perkasa | INDONESIA | Compliant |
| Tin | PT Sukses Inti Makmur | INDONESIA | Compliant |
| Tin | PT Sumber Jaya Indah | INDONESIA | Compliant |
| Tin | PT Timah (Persero) Tbk Kundur | INDONESIA | Compliant |
| Tin | PT Timah (Persero) Tbk Mentok | INDONESIA | Compliant |
| Tin | PT Tinindo Inter Nusa | INDONESIA | Compliant |
| Tin | PT Tommy Utama | INDONESIA | Compliant |
| Tin | PT Wahana Perkit Jaya | INDONESIA | Compliant |
| Tin | Resind Indústria e Comércio Ltda. | BRAZIL | Compliant |
| Tin | Rui Da Hung | TAIWAN | Compliant |
| Tin | Soft Metais Ltda. | BRAZIL | Compliant |
| Tin | Thaisarco | THAILAND | Compliant |
| Tin | VQB Mineral and Trading Group JSC | VIET NAM | Compliant |
| Tin | White Solder Metalurgia e Mineração Ltda. | BRAZIL | Compliant |
| Tin | Yunnan Tin Company Limited | CHINA | Compliant |
| Tin | An Thai Minerals Company Limited | VIET NAM | Active |
| Tin | An Vinh Joint Stock Mineral Processing Company | VIET NAM | Active |
| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy JSC | VIET NAM | Active |
| Tin | Gejiu Kai Meng Industry and Trade LLC | CHINA | Active |

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| Tin | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | CHINA | Active |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company | VIET NAM | Active |
| Tin | Phoenix Metal Ltd. | RWANDA | Active |
| Tin | PT Karimun Mining | INDONESIA | Active |
| Tin | Tuyen Quang Non-Ferrous Metals Joint Stock Company | VIET NAM | Active |
| Tin | Yunnan Chengfeng Non-ferrous Metals Co., Ltd. | CHINA | Active |
| Tin | CNMC (Guangxi) PGMA Co., Ltd. | CHINA | On Reference List Only |
| Tin | Estanho de Rondônia S.A. | BRAZIL | On Reference List Only |
| Tin | Feinhütte Halsbrücke GmbH | GERMANY | On Reference List Only |
| Tin | Gejiu Zili Mining And Metallurgy Co., Ltd. | CHINA | On Reference List Only |
| Tin | Hachinohe Smelting Company | JAPAN | On Reference List Only |
| Tin | Huichang Jinshunda Tin Co., Ltd. | CHINA | On Reference List Only |
| Tin | Linwu Xianggui Ore Smelting Co., Ltd. | CHINA | On Reference List Only |
| Tin | PT Tirus Putra Mandiri | INDONESIA | On Reference List Only |
| Tungsten | A.L.M.T. TUNGSTEN Corp. | JAPAN | Compliant |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd. | CHINA | Compliant |
| Tungsten | Chongyi Zhangyuan Tungsten Co Ltd | CHINA | Compliant |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd. | CHINA | Compliant |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd. | CHINA | Compliant |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd. | CHINA | Compliant |
| Tungsten | Ganzhou Yatai Tungsten Co., Ltd. | CHINA | Compliant |
| Tungsten | Global Tungsten & Powders Corp. | UNITED STATES | Compliant |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd. | CHINA | Compliant |
| Tungsten | H.C. Starck GmbH | GERMANY | Compliant |
| Tungsten | H.C. Starck Smelting GmbH & Co.KG | GERMANY | Compliant |
| Tungsten | Hunan Chenzhou Mining Co., Ltd. | CHINA | Compliant |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd. | CHINA | Compliant |
| Tungsten | Hydrometallurg, JSC | RUSSIAN FEDERATION | Compliant |
| Tungsten | Japan New Metals Co Ltd | JAPAN | Compliant |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd. | CHINA | Compliant |
| Tungsten | Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd. | CHINA | Compliant |
| Tungsten | Kennametal Huntsville | UNITED STATES | Compliant |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd. | CHINA | Compliant |
| Tungsten | Niagara Refining LLC | UNITED STATES | Compliant |
| Tungsten | Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC | VIET NAM | Compliant |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd. | VIET NAM | Compliant |
| Tungsten | Wolfram Bergbau und Hütten AG | AUSTRIA | Compliant |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd. | CHINA | Compliant |

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| Tungsten | Xiamen Tungsten Co., Ltd. | CHINA | Compliant |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd. | CHINA | Compliant |
| Tungsten | Dayu Jincheng Tungsten Industry Co., Ltd. | CHINA | Active |
| Tungsten | Dayu Weiliang Tungsten Co., Ltd. | CHINA | Active |
| Tungsten | Ganzhou Non-ferrous Metals Smelting Co., Ltd. | CHINA | Active |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd. | CHINA | Active |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | CHINA | Active |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd. | CHINA | Active |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd. | CHINA | Active |
| Tungsten | Pobedit, JSC | RUSSIAN FEDERATION | Active |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. | CHINA | On Reference List Only |
| Tungsten | Sanher Tungsten Vietnam Co., Ltd. | VIET NAM | On Reference List Only |

We note the following in connection with the information in the table:

- (a) Not all of the included smelters and refiners may have processed the necessary 3TG contained in our in-scope products, since some Suppliers reported at a "company level," meaning that they reported the 3TG contained in all of their products, not just those in the products that they manufactured for us. Some Suppliers also may have reported smelters and refiners that were not in our supply chain due to over-inclusiveness in the information received from their suppliers or for other reasons. In addition, the smelters and refiners reflected above may not include all of the smelters and refiners in our supply chain, since some Suppliers did not identify all of the smelters and refiners used to process the necessary 3TG content contained in our in-scope products and because not all Suppliers responded to our inquiries.
- (b) All information in the table is as of May 26, 2016.
- (c) "Compliant" means that the smelter or refiner was compliant with the CFSI's Conflict-Free Smelter Program's ("CFSP") assessment protocols, including through mutual recognition and those indicated as "Re-audit in process." Included smelters or refiners were not necessarily Compliant for all or part of 2015 and may not continue to be Compliant for any future period.
- (d) "Active" means that the smelter or refiner is listed by the CFSI as having submitted a signed Agreement for the Exchange of Confidential Information and Auditee Agreement contracts to the CFSP or, according to information published by the CFSI, the smelter has agreed to complete a CFSP validation audit within two years of membership issuance by the Tungsten Industry – Conflict Minerals Council.
- (e) "On Reference List Only" means the smelter or refiner is not listed as "Compliant" or "Active."
- (f) The compliance status reflected in the table is based solely on information made publicly available by the CFSI, without independent verification by us.
- (g) Country location is the location of the smelter or refiner.

Country of Origin Information

The countries of origin of the 3TG processed by the Compliant smelters and refiners listed above may have included countries in each of the categories listed below. The countries below are sorted by risk level.

L1 – Countries that are not identified as conflict regions or plausible areas of smuggling or export from the DRC and its nine adjoining regions: Argentina, Australia, Austria, Belgium, Bolivia, Brazil, Cambodia, Canada, Chile, China, Colombia, Cote d'Ivoire, Czech Republic, Djibouti, Ecuador, Egypt, Estonia, Ethiopia, France, Germany, Guyana, Hungary, India, Indonesia, Ireland, Israel, Japan, Kazakhstan, Laos, Luxembourg, Madagascar, Malaysia, Mongolia, Myanmar, Namibia, Netherlands, Nigeria, Peru, Portugal, Russia, Sierra Leone, Singapore, Slovakia, South Korea, Spain, Suriname, Switzerland, Taiwan, Thailand, United Kingdom, United States, Vietnam and Zimbabwe.

L2 – Countries that are known or plausible countries for smuggling, export out of region or transit of materials containing 3TG: Kenya, Mozambique and South Africa.

L3 – The DRC and its nine adjoining countries: Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, South Sudan, Uganda, United Republic of Tanzania and Zambia.

DRC – The Democratic Republic of the Congo.

In addition, some of the listed Compliant smelters and refiners may have processed 3TG originating from recycled or scrap sources.

For 2015, we were not able to determine the country of origin of the 3TG processed by any of the smelters or refiners listed as "Active" or "On Reference List Only."