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

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**FORM SD**

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**SPECIALIZED DISCLOSURE REPORT**

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**Microsoft Corporation**

(Exact Name of the Registrant as Specified in Its Charter)

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**Washington**  
(State or Other Jurisdiction  
of Incorporation)

**001-37845**  
(Commission  
File Number)

**91-1144442**  
(IRS Employer  
Identification No.)

**One Microsoft Way, Redmond, Washington**  
(Address of Principal Executive Offices)

**98052-6399**  
(Zip Code)

**Brian B. DeFoe**  
**Deputy General Counsel and Corporate Secretary**  
**(425) 882-8080**

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

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Check the appropriate box to indicate the rule pursuant to which this form is being submitted, 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, 2025.
- Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the fiscal year ended .
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**Section 1 - Conflict Minerals Disclosure****Item 1.01 Conflict Minerals Disclosure and Report****Conflict Minerals Disclosure**

A copy of Microsoft's Conflict Minerals Report is provided as Exhibit 1.01 hereto and is publicly available at:

<http://aka.ms/conflictmineralreport>

**Item 1.02 Exhibit**

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

**Section 3 - Exhibits****Item 3.01 - Exhibits**

Exhibit 1.01 - [Conflict Minerals Report](#)

**SIGNATURE**

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

MICROSOFT CORPORATION  
(Registrant)

Date: May 28, 2026

/s/ BRADFORD L. SMITH

Bradford L. Smith  
Vice Chair and President

**MICROSOFT CORPORATION  
CONFLICT MINERALS REPORT  
FOR 2025 REPORTING YEAR**

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**I. Introduction**

This Conflict Minerals Report (“CMR”) for MICROSOFT CORPORATION (“Microsoft”) is filed with the United States Securities and Exchange Commission (SEC) as an exhibit to Microsoft’s Form SD pursuant to Rule 13p-1 under the Securities Exchange Act of 1934, as amended, (the “Rule”) for the 2025 Reporting Year (“RY”) (January 1, 2025-December 31, 2025).<sup>1</sup> The CMR covers all Microsoft majority-owned subsidiaries and variable interest entities that are subject to the Rule.<sup>2</sup> During the 2025 Reporting Year, covered devices included the Surface line of computers, tablets, and accessories; Xbox gaming consoles, accessories, and select merchandise manufactured or contracted to manufacture by Microsoft; the HoloLens mixed reality device; and Nuance dictation devices.

Our commitment to the responsible sourcing of raw materials is established by Microsoft’s Responsible Sourcing of Raw Materials (“RSRM”) Policy, which guides our work to ensure that all raw materials used in our devices, unbounded by specific materials or locations, are sourced from responsible suppliers. We commit to the responsible sourcing of tin, tantalum, tungsten, and gold (“3TGs”) from Conflict Affected and High-Risk Areas (“CAHRAs”), including the Democratic Republic of the Congo (“DRC”) or DRC-adjointing countries (each a “Covered Country” under the Rule), rather than restricting or avoiding sourcing from such regions. We do this in recognition of the harmful societal and economic impacts that curtailing 3TG mineral sourcing from such regions might cause.

Based on our supply chain due diligence, we determined that 3TGs that were necessary to the functionality or production of devices we manufactured or contracted to manufacture during the 2025 Reporting Year may have originated in a Covered Country. Microsoft found no reasonable basis for concluding that any 3TG Smelter or Refiner (“SOR”) that was identified in the Microsoft Devices supply chain for the 2025 Reporting Year sourced 3TGs in a manner that directly or indirectly financed or benefitted armed groups in a Covered Country.

<sup>1</sup> This CMR contains links to internal and external websites for informational purposes only. References to such websites and information available through such websites are not incorporated into this CMR. Additionally, this CMR includes forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995. These forward-looking statements are based on current expectations and assumptions regarding the future implementation of our responsible sourcing program and are subject to change. Statements in this CMR are based on due diligence activities that were performed in good faith and to the best of our ability at the time of this filing. Factors that could affect the accuracy of such statements include, but are not limited to, incomplete or incorrect data submitted by suppliers, amendments to the Rule or SEC guidance.

<sup>2</sup> Throughout this CMR, we use “Microsoft,” “Microsoft Devices,” “we,” “our,” “us” and similar terms to refer to Microsoft Corporation and its subsidiaries and various interest entities subject to the Rule (collectively, “Microsoft”), unless otherwise indicated.

## II. Due Diligence Framework

This CMR is based on Microsoft Devices' Due Diligence Framework ("Due Diligence Framework"), which conforms to the Organisation for Economic Co-operation and Development ("OECD") Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and its related Supplements ("OECD Guidance").

Our Microsoft Devices supply chain contains many layers of upstream suppliers positioned between Microsoft and 3TG raw material mines and SORs. We use contractual provisions to require our direct suppliers to disclose 3TG sourcing information through the Responsible Minerals Initiative ("RMI") industry standard Conflict Minerals Reporting Template (CMRT) and meet audit requirements regarding the sources and chains of custody of 3TGs necessary for the functionality or production of our covered devices. We also require our direct suppliers to cascade Microsoft requirements regarding 3TG sources and chains of custody to their own suppliers. In this manner, we work to promote responsible sourcing across our direct and cascading supply chains.

Our due diligence actions align to the OECD Guidance and fulfill the Rule including several quality assurance steps. We review all supplier responses to identify and address any inaccuracies or inconsistencies in the 3TG sourcing data that is reported to us. We engage a third party to review all 3TG sourcing data reported to us and to conduct due diligence on identified SORs. If a non-conformant SOR is reported by a supplier, we work with the supplier to engage with the SOR to bring them into conformance. If the SOR is not interested or not able to become conformant, we instruct suppliers to remove the SOR from their supply chain and source from conformant alternatives or face business termination with Microsoft.

We also survey our supply chain for minerals beyond 3TGs and beyond the Covered Countries consistent with our RSRM Policy, which is unbounded by specific materials or location. In addition to the CMRT survey, which is focused on 3TGs, we request our in-scope suppliers to report on their use of cobalt and other priority minerals, including aluminum, copper, gallium, lithium, nickel, silicon, germanium, graphite, and rare earth elements leveraging industry reporting templates. Through this process, we are able to discern additional risks in our supply chain.

### **OECD Step #1: Establish Strong Company Management Systems**

#### **1. Company Policies**

Microsoft's commitment to corporate responsibility and integrity guides everything we do as a company. We have established high ethical standards to govern the way we conduct our business, which also apply to our suppliers and business partners. Microsoft policies include the Microsoft Global Human Rights Statement, Microsoft Supply Chain Human Rights Policy Statement, Trust Code, and our Supplier Code of Conduct. These policies establish Microsoft expectations for our suppliers concerning legal and regulatory compliance; business practices and ethics; human rights and fair labor practices; health and safety; environmental protection; and data and privacy protection.

As previously described, our RSRM Policy describes our commitment to responsibly sourcing raw materials. This pledge extends to the harvesting, extraction, and transportation of raw materials, unbounded by specific material or location, and supports implementation of programs that advance the use of responsibly sourced minerals in our manufactured devices.

Our policies are based on internationally recognized standards, including the following declaration and covenants: Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, and International Covenant on Economic, Social and Cultural Rights. Our business operations are informed by human rights guidelines described in the following documents: International Labor Organization's ("ILO") Declaration on Fundamental Principles and Rights at Work, OECD Guidelines for Multinational Enterprises, and the United Nations Global Compact. As a global Information and Communications Technology company operating in more than 100 countries, we respect all human rights - civil, political, economic, social, and cultural; and our supplier requirements reflect the same level of commitment.

## **2. *Internal Management Team and Corporate Approval***

A cross-functional internal team supports our program and CMR development. Microsoft's Director of Supply Chain Responsibility and Resilience sponsors the team, which consists of representatives from Microsoft Devices Operations; Responsible Sourcing Assurance; Corporate, External and Legal Affairs; and Trade. The team assesses program progress, identifies steps needed to meet our compliance obligations, and identifies areas for continuous improvement. The team annually develops, reviews, and submits the final CMR to Microsoft's President for approval and signature before being filed as an Exhibit to Microsoft's Form SD and posted on the Microsoft website pursuant to the Rule.

## **3. *System of Supply Chain Controls, Data Disclosure, and Due Diligence Assurance***

Our Due Diligence Framework is based on a system of supply chain controls, data disclosure, and due diligence assurance. Our contracts require our suppliers to meet Microsoft specifications. Our environmental compliance specifications - H00594, Restricted Substances for Hardware Products; and H00642, Microsoft Restricted Substances Control System for Hardware Products (both available at this [link](#)) - require the disclosure of every substance contained in the materials, components, and products supplied to us, including 3TGs, by weight.

We require suppliers to annually submit a CMRT that provides source and chain of custody information for 3TGs that are contained in the products and components they supply to us. Our contracts also require suppliers to obtain the same information from their upstream suppliers. We collect these supply chain disclosures, conduct controls to ensure data integrity, and assess 3TG sourcing risk.

Microsoft supply chain mineral disclosure requirements go beyond 3TGs and cover additional prioritized minerals. Since 2019, we have required suppliers to report on their use of cobalt, using the Responsible Minerals Initiative's Extended Minerals Reporting Template ("EMRT") which includes copper, cobalt, mica, graphite, lithium, and nickel. Since 2024, we have utilized the RMI's Additional Minerals Reporting Template ("AMRT"), formerly known as the Pilot Reporting Template ("PRT"), for

all other prioritized minerals, including: aluminum, gallium, silicon, germanium and rare earth elements. These additional minerals are prioritized through an extensive internal review and risk analysis of the minerals present in our products. This regular prioritization exercise ensures that the minerals on which we focus are representative of identified need, and thus this list is dynamic over time.

Microsoft Supplier Social and Environmental Accountability Manual Excerpt (“H02050”) provides an operational framework for Microsoft to achieve supplier conformance with Microsoft’s Supplier Code of Conduct and other responsible sourcing requirements. H02050 establishes a minimum set of requirements that suppliers must meet, including compliance with all applicable laws and regulations with respect to labor, ethics, occupational health and safety, and protection of the environment. Suppliers are encouraged to go beyond legal compliance by meeting relevant international standards (e.g., ILO and relevant United Nations Conventions) and commit to a process of continuous improvement.

H02050 requires all in-scope suppliers to:

- Adopt a company policy for raw material sourcing, including a commitment to source raw materials from responsible sources and clearly communicate such policy to their suppliers and the public;
- Exercise due diligence on the source and chain of custody of high-risk raw materials, including 3TGs, contained in materials, products, or parts supplied to Microsoft;
- Require SORs to participate in the Responsible Mining Assurance Process (“RMAP”) or an equivalent independent, third-party audit program for 3TGs;
- Timely communicate potential sourcing risks to Microsoft and propose a contingency plan and mitigation strategy to achieve conformance; and
- Establish a system to gather, examine, and verify sourcing information for raw materials, including 3TGs, contained in products supplied to Microsoft and request their upstream suppliers to do the same. This supply chain transfer of audit data, source and chain of custody information, and risk assessment enables and facilitates raw material due diligence, mapping, and transparency.

Microsoft works with its suppliers to use SORs that are conformant to RMAP or another equivalent independent, third-party audit program for 3TGs. If we find that a supplier has introduced responsible sourcing risk to the Microsoft supply chain, such as use of an upstream SOR that is not conformant, Microsoft engages such supplier to address the non-conformance. Risks are mitigated by supplier engagement, audits, training, and business termination when appropriate. These controls and related documentation are detailed in H02050 and Microsoft internal operating procedures.

#### **4. *Leveraging Industry Partnerships for Greater Impact***

We leverage partnerships with industry peers and partners to scale our responsible sourcing impact. Microsoft is a long-standing member of the Responsible Business Alliance (“RBA”) and the RMI. The RMI is one of the most utilized and respected resources for supply chain minerals due diligence and is aligned to the OECD Guidance. The RMI operates and manages the RMAP, which uses independent, third-party audits to assess, monitor, and validate whether SORs process 3TGs from sources that directly or indirectly finance, or benefit armed groups in a CAHRA, including Covered Countries.

In 2025, Microsoft provided direct financial support to the RMI upstream smelter due diligence fund and ESG audit fund to further the reach and success of the RMAP and participated in Working Groups to support the RMI and to improve and expand the scope of responsible mineral sourcing activities. For example, Microsoft’s participation in the Smelter Engagement Team (SET) helps support RMI’s goals of ensuring more smelters are participating in the RMAP and that current smelters stay engaged in the program.

We also work outside of our supply chain to promote responsible mining practices in CAHRAs, including Covered Countries, by partnering with organizations, including the RMI, the Initiative for Responsible Mining Assurance (“IRMA”), the Public-Private Alliance for Responsible Minerals Trade (“PPA”), and others. In this manner, we go beyond the minimum due diligence established by the OECD Guidance to assess and reduce our supply chain sourcing risk and improve working conditions in raw material supply chains.

#### **5. *Supplier Engagement to Ensure Conformance***

We apply several supplier-focused strategies to promote responsible mining and sourcing, including the supplier engagement tools set forth below.

- **Supplier Requirements:** We require our suppliers to meet our material disclosure requirements and related responsible sourcing policies through contractual provisions and product specifications. We communicate, monitor, and track supplier adherence to these requirements, ensuring conformance through the Microsoft Compliance Map System.
- **Training:** We train suppliers on our responsible sourcing requirements through classes, educational forums, and direct communications. Existing suppliers and newly onboarded suppliers are required to complete training modules to understand and implement Microsoft Social and Environmental Accountability (“SEA”) requirements. We leverage the online component of our “SEA Academy” to educate factory management, workers, and third-party auditors as well as internal Microsoft teams with the goal of promoting responsible sourcing across our supply chain.
- **Capability Building and Partnerships:** We work closely with in-scope suppliers and third-party auditors to build suppliers’ raw material due diligence capabilities and advance conformance to the RMAP or equivalent independent, third-party audit program for 3TGs. We invest in industry programs to increase suppliers’ abilities and provide platforms for sharing best practices.
- **Supplier Audits and Conformance Assurance:** Microsoft requires audits of its directly contracted suppliers to assess their conformance to our Supplier Code of Conduct requirements. Newly contracted suppliers undergo an Initial Capability Assessment prior to onboarding and Sustaining Maintenance Audits after onboarding to verify their initial conformance and to confirm their sustained conformance to our requirements.

Microsoft selects and retains business partners that are committed to meeting these requirements. A failure by a supplier or their upstream suppliers to conform to these requirements may constitute a breach of the supplier’s contractual agreement with Microsoft, resulting in possible business termination.

## 6. *Grievance Mechanism*

Microsoft provides an anonymous grievance reporting mechanism for employees and other stakeholders who may be impacted by our operations. Microsoft’s Integrity Portal allows employees and others to anonymously ask compliance questions or report concerns regarding Microsoft’s business operations, including our responsible sourcing policies or those of our suppliers. Additionally, Microsoft continues to scale its Worker Voice Hotline Program<sup>3</sup> across our supplier factories. This program provides workers with a reliable and anonymous reporting channel for raising workplace concerns. The Hotline is operated by a neutral third-party provider. We investigate and, where appropriate, take remedial action to address reported issues. We also participate in the development of industry grievance mechanisms that seek to address responsible sourcing of raw materials-related issues.

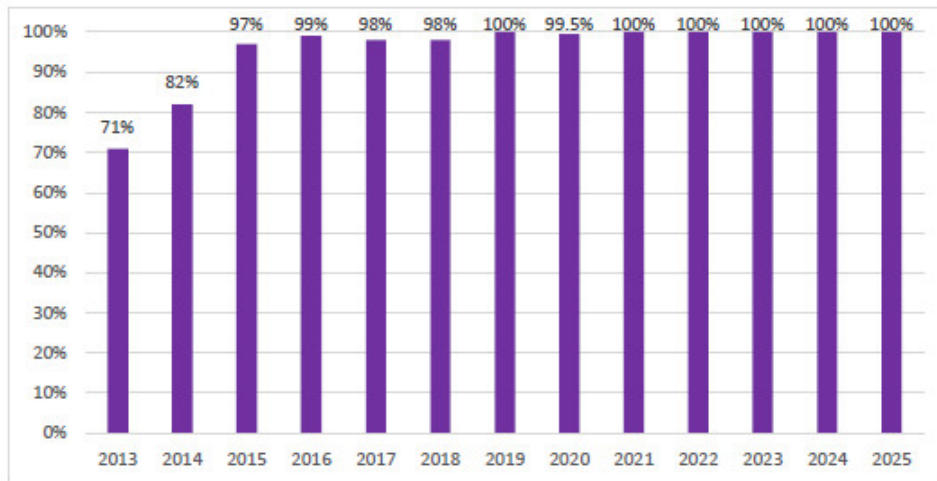
### **OECD Step #2:**

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

In order to make a Reasonable Country of Origin Inquiry (“RCOI”) determination, Microsoft took the following steps, which are consistent with OECD Guidance and Microsoft procedure, to identify and assess 3TG sourcing risk in our supply chain during the 2025 RY:

- We generated a list of in-scope suppliers and surveyed 79 Microsoft Devices direct suppliers to determine whether they used any 3TGs in the products or parts supplied to Microsoft by utilizing the CMRT and the services of a third-party solution provider. All in-scope suppliers responded to our survey request – a 100% response rate. For these suppliers, we reviewed their CMRT responses to validate completion and to identify any contradictions or inconsistencies.
- We excluded suppliers who did not report the use of 3TG minerals.
- Based on the CMRTs, 266 SORs were found to be affiliated with RMAP or an equivalent, independent, third-party audit program for 3TG minerals such as cross-recognized programs overseen by the London Bullion Market Association (“LBMA”) or Responsible Jewelry Council (“RJC”).

<sup>3</sup> Please see page 32 of our [Human Rights Transparency Report](#) for more details regarding our Workers’ Voice Hotline Program.

**Figure 1. CMRT Response Rate (2013-2025 Reporting Years)**

**OECD Step #3:  
Design and Implement a Strategy to Respond to Risks**

We determined that 3TGs that were necessary to the functionality or production of covered devices may have originated in one or more Covered Countries. Accordingly, we performed due diligence on the source and chain-of-custody of those 3TGs to assess our conflict minerals sourcing risk.

**7. Microsoft Supplier Specifications - H00594, H00642, and H02050**

For the 2025 RY, Microsoft required its in-scope suppliers to conduct due diligence to address the potential sourcing of 3TGs from CAHRAs, including Covered Countries, through contract requirements (H00594, H00642, and H02050), incorporating Microsoft’s supplier specifications and responsible sourcing requirements, as detailed above.

**8. Implementation of OECD Guidance**

Microsoft screened its in-scope supplier CMRT data for the 2025 RY against the OECD Guidance “red flag” triggers<sup>4</sup> to assess the in-scope suppliers that required due diligence per the OECD Guidance.

<sup>4</sup> See p. 33 of the [OECD Guidance](#).

**OECD Step #4:  
Independent Third-Party Audits of Supply Chain Due Diligence**

Our due diligence program leveraged independent SOR audits to provide assurance that the 266 Eligible 3TG SORs that were identified in our supply chain for the 2025 Reporting Year conducted an appropriate level of conflict minerals due diligence. Microsoft obtained SOR data from the RMAP Conformant Smelter List<sup>5</sup> using *Reasonable Country of Origin Inquiry Data* for member MSFT and used the SOR data to assess the conflict mineral audit status of our in-scope suppliers and to support our due diligence findings.

Recognizing the importance of broad and consistent participation in the RMAP, Microsoft *proactively* engages directly with certain SORs where it is believed that a SOR may be *at risk* of becoming non-conformant. Microsoft also asks its suppliers to engage directly with potentially non-conformant SORs to prevent potential non-conformance as a Microsoft supplier. Although Microsoft's Responsible Sourcing program operates an escalation and engagement process should non-conformant SORs be detected, taking a proactive approach to potentially non-conformant SORs helps prevent potential non-conformances from occurring.

**OECD Step #5:  
Report on Supply Chain Due Diligence**

We have filed our CMR with the SEC and posted it on our [Microsoft Supply Chain Integrity website](#). The website provides additional information about Microsoft's RSRM Program. These disclosures meet the fifth step of the OECD Guidance.

**III. Conflict Mineral Disclosure**

**A. Reasonable Countries of Origin of 3TGs**

Microsoft obtained Reasonable Country of Origin data through our RMI membership using the *Reasonable Country of Origin Inquiry Data* for member MSFT. We used this data to determine the 3TG country of origin for the 266 Eligible SORs identified in Microsoft Devices' supply chain for the 2025 RY.

<sup>5</sup> The RMAP Conformant Smelter list identifies the SORs that have undergone conformance audits through the RMAP or equivalent independent, third-party audit programs for 3TGs.

The RMAP classifies SOR audit status in the manner described in the table below. The breakdown of the identified 266 Eligible 3TG SORs (for which minerals sourcing information was available from RMAP or an equivalent, independent, third-party audit program for 3TGs) by their RMI Status was as follows:

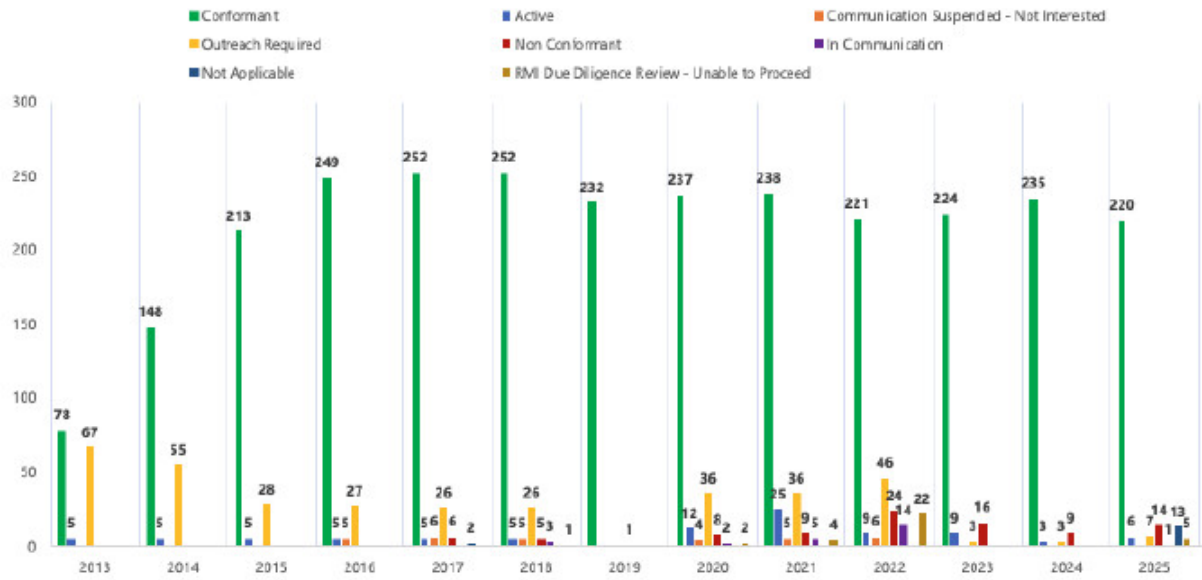
<b>Audit Status</b>	<b>Audit Status Description</b>	<b>SOR Count</b>	<b>Percentage</b>
<b>Conformant</b>	<i>SOR has been audited and found to conform with a relevant, third-party audit protocol, including RMAP, LBMA, or RJC</i>	220	82.7%
<b>Active</b>	<i>SOR has been engaged but is not yet conformant</i>	6	2.3%
<b>Non-Conformant</b>	<i>SOR was audited but found not to conform to a relevant, third-party audit protocol or failed to renew its assessment</i>	14	5.3%
<b>Outreach Required</b>	<i>SOR is not yet active, and outreach is needed by RMAP member companies to encourage SOR participation in RMAP</i>	7	2.6%
<b>In Communication</b>	<i>SOR is not yet active but is in communication with RMAP and/or member company</i>	1	0.4%
<b>RMI Due Diligence Review</b>	<i>Unable to Proceed: SOR has not met the threshold for Due Diligence Vetting Process after a period of 6 months. Status may change if additional information is submitted</i>	5	1.9%
<b>Not Applicable</b>	<i>Facility has suspended or ceased operations however inventory potentially still used</i>	13	4.9%

For the identified 266 Eligible 3TG SORs:

- 31 SORs sourced from Covered Countries, of which 31 (100%) were Conformant.
- Out of 266 Eligible SORs, 226 (84.9%) were participating in a third-party audit program (either Conformant or Active); and
- The remaining SORs were reasonably believed to have sourced 3TGs from outside the Covered Countries.

Microsoft found no reasonable basis for concluding that any SOR sourced 3TGs in a manner that directly or indirectly financed or benefitted armed groups in a Covered Country. Figure 2 depicts the SORs by 3TG audit status and Reporting Year.

**Figure 2. Identified SORs by Audit Status (2013- 2025 Reporting Years)**



Appendix A provides the list of 266 Eligible SORs identified in Microsoft Devices’ supply chain which processed 3TGs during the 2025 Reporting Year. Appendix A lists each SOR by mineral, official name, and country of operation.

**3TG Countries of Origin**

The table below lists the countries of origin for the 266 Eligible SORs identified in the Microsoft Devices' supply chain and which processed 3TG minerals during the 2025 RY.

Andorra	Italy	Tanzania
Australia	Japan	Thailand
Austria	Kazakhstan	Turkey
Belgium	Korea, Republic of	Uganda
Bolivia	Malaysia	United States of America
Brazil	Mexico	Uzbekistan
Canada	Myanmar	Vietnam
Chile	Netherlands	
China	Peru	
Colombia	Philippines	
Congo, Democratic Republic of the	Poland	
Czech Republic	Rwanda	
Estonia	Singapore	
France	South Africa	
Germany	Spain	
Hong Kong	Sweden	
India	Switzerland	
Indonesia	Taiwan	

**IV. Microsoft Commitment**

Microsoft is committed to the responsible sourcing of raw materials in support of human rights; labor, health and safety; and environmental protection. We continue to advance implementation of our RSRM policy in our Microsoft Devices supply chain to promote supply chain identification, traceability, risk assessment, and due diligence.

Our 2025 RY achievements included the following:

- We supported supplier efforts to increase their responsible sourcing capabilities through supplier forums, training, webinars, and by providing technical resources;
- We continued our engagements with external responsible sourcing organizations, including but not limited to the RMI, that are committed to advancing responsible sourcing on a global basis;
- We achieved a 100% supplier CMRT response rate through extensive supplier outreach, including a supplementary campaign to directly contact suppliers and encourage reporting;
- We conducted a data validation and verification program to randomly audit CMRT information submitted to us by suppliers to validate and confirm that supplier data was accurate and complete;
- Leveraged Full Material Disclosure and other supplier data to fine-tune supplier data requests and verify and confirm reported critical raw material information.

Going forward, Microsoft will remain focused on internal and external efforts to promote the responsible sourcing of minerals, including:

- Expanding our knowledge about 3TGs, cobalt, and other critical raw materials to effectively implement our RSRM strategy to promote the responsible sourcing of raw materials across our hardware supply chains;
- Requiring our in-scope suppliers to meet our requirements for responsibly sourcing raw materials and finding alternative upstream suppliers if they are found to be sourcing from non-conformant SORs;
- Engaging with in-scope suppliers so that they utilize supplier best practices and tools for responsibly sourcing raw materials from CAHRAs, including Covered Countries;
- Furthering engagement with industry organizations and external stakeholders to improve mineral traceability, establish global responsible sourcing standards, and support due diligence programs in the mineral supply chain; and

## Appendix A

### Eligible SORs for 2025 Reporting Year

This Appendix lists the 266 eligible SORs which processed 3TG minerals during the 2025 RY. Please note that Eligible SORs are listed for each 3TG they processed. Therefore, certain Eligible SORs may be represented more than once.

#### Gold

<u>Smelter Name</u>	<u>Country</u>
ABC Refinery Pty Ltd.	Australia
Abington Reldan Metals, LLC	United States of America
Advanced Chemical Company	United States of America
Agosi AG	Germany
Aida Chemical Industries Co., Ltd.	Japan
Almalyk Mining and Metallurgical Complex (AMMC)	Uzbekistan
AngloGold Ashanti Corrego do Sitio Mineracao	Brazil
Argor-Heraeus S.A.	Switzerland
ASAHI METALFINE, Inc.	Japan
Asahi Refining Canada Ltd.	Canada
Asahi Refining USA Inc.	United States of America
Asaka Riken Co., Ltd.	Japan
Aurubis AG, Hamburg	Germany
Bangalore Refinery	India
Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	Philippines
Boliden Mineral AB (Ronnskar)	Sweden
C. Hafner GmbH + Co. KG	Germany
Caridad	Mexico
Chimet S.p.A.	Italy
Chugai Mining	Japan
Coimpa Industrial LTDA	Brazil
Daye Non-Ferrous Metals Mining Ltd.	China
Dowa	Japan
DSC (Do Sung Corporation)	Korea, Republic of
Eco-System Recycling Co., Ltd. East Plant	Japan
Eco-System Recycling Co., Ltd. North Plant	Japan
Eco-System Recycling Co., Ltd. West Plant	Japan
Elite Industech Co., Ltd.	Taiwan
GG Refinery Ltd.	Tanzania
GGC Gujrat Gold Centre Pvt. Ltd.	India
Glencore Canada Corporation - CCR Refinery	Canada

<b>Gold by Gold Colombia</b>	Colombia
<b>Gold Corporation - The Perth Mint</b>	Australia
<b>Great Wall Precious Metals Co., Ltd. of CBPM</b>	China
<b>Hangzhou Fuchunjiang Smelting Co., Ltd.</b>	China
<b>Heimerle + Meule GmbH</b>	Germany
<b>Heraeus Germany GmbH Co. KG</b>	Germany
<b>Heraeus Metals Hong Kong Ltd.</b>	Hong Kong
<b>Hunan Chenzhou Mining Co., Ltd.</b>	China
<b>Impala Platinum - Base Metal Refinery (BMR)</b>	South Africa
<b>Impala Platinum - Platinum Metals Refinery (PMR)</b>	South Africa
<b>Impala Platinum - Rustenburg Smelter</b>	South Africa
<b>Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.</b>	China
<b>Ishifuku Metal Industry Co., Ltd.</b>	Japan
<b>Istanbul Gold Refinery</b>	Turkey
<b>Italpreziosi</b>	Italy
<b>Japan Mint</b>	Japan
<b>Jiangxi Copper Co., Ltd.</b>	China
<b>JX Advanced Metals Corporation</b>	Japan
<b>Kazzinc Ltd</b>	Kazakhstan
<b>Kennecott Utah Copper LLC</b>	United States of America
<b>KGHM Polska Miedz Spolka Akcyjna</b>	Poland
<b>Kojima Chemicals Co., Ltd.</b>	Japan
<b>Korea Zinc Co., Ltd.</b>	Korea, Republic of
<b>L'Orfebre S.A.</b>	Andorra
<b>LS MnM Inc.</b>	Korea, Republic of
<b>LT Metal Ltd.</b>	Korea, Republic of
<b>Materion</b>	United States of America
<b>Matsuda Sangyo Co., Ltd.</b>	Japan
<b>Metal Concentrators SA (Pty) Ltd.</b>	South Africa
<b>Metalor Technologies (Hong Kong) Ltd.</b>	China
<b>Metalor Technologies (Singapore) Pte., Ltd.</b>	Singapore
<b>Metalor Technologies (Suzhou) Ltd.</b>	China
<b>Metalor Technologies S.A.</b>	Switzerland
<b>Metalor USA Refining Corporation</b>	United States of America
<b>Metalurgica Met-Mex Penoles S.A. De C.V.</b>	Mexico
<b>Mitsubishi Materials Corporation</b>	Japan
<b>Mitsui Mining and Smelting Co., Ltd.</b>	Japan
<b>MKS PAMP SA</b>	Switzerland
<b>MMTC-PAMP India Pvt., Ltd.</b>	India
<b>Nadir Metal Rafineri San. Ve Tic. A.S.</b>	Turkey
<b>Navoi Mining and Metallurgical Combinat</b>	Uzbekistan
<b>NH Recytech Company</b>	Korea, Republic of
<b>Nihon Material Co., Ltd.</b>	Japan

<b>Oegussa Oesterreichische Gold- und Silber-Scheideanstalt Gesm.b.H.</b>	Austria
<b>Ohura Precious Metal Industry Co., Ltd.</b>	Japan
<b>Planta Recuperadora de Metales SpA</b>	Chile
<b>PT Aneka Tambang (Persero) Tbk</b>	Indonesia
<b>PX Precinox S.A.</b>	Switzerland
<b>Rand Refinery (Pty) Ltd.</b>	South Africa
<b>REMONDIS PMR B.V.</b>	Netherlands
<b>Royal Canadian Mint</b>	Canada
<b>SAFINA A.S.</b>	Czechia
<b>SEMPSA Joyeria Plateria S.A.</b>	Spain
<b>Shandong Gold Smelting Co., Ltd.</b>	China
<b>Shandong Zhaojin Gold &amp; Silver Refinery Co., Ltd.</b>	China
<b>Sichuan Tianze Precious Metals Co., Ltd.</b>	China
<b>Solar Applied Materials Technology Corp.</b>	Taiwan
<b>SOLEIL METALS (Chala One Plant)</b>	Peru
<b>SOLEIL METALS (YAKARI Plant)</b>	Peru
<b>Sumitomo Metal Mining Co., Ltd.</b>	Japan
<b>SungEel HiMetal Co., Ltd.</b>	Korea, Republic of
<b>T.C.A S.p.A</b>	Italy
<b>Tanaka Kikinzoku Kogyo K.K.</b>	Japan
<b>Tokuriki Honten Co., Ltd.</b>	Japan
<b>TOO Tau-Ken-Altyn</b>	Kazakhstan
<b>Torecom</b>	Korea, Republic of
<b>Umicore S.A. Business Unit Precious Metals Refining</b>	Belgium
<b>United Precious Metal Refining, Inc.</b>	United States of America
<b>Valcambi S.A.</b>	Switzerland
<b>WEEEREFINING</b>	France
<b>WIELAND Edelmetalle GmbH</b>	Germany
<b>Yamakin Co., Ltd.</b>	Japan
<b>Yokohama Metal Co., Ltd.</b>	Japan
<b>Zhongyuan Gold Smelter of Zhongjin Gold Corporation</b>	China
<b>Zijin Mining Group Gold Smelting Co. Ltd.</b>	China

#### Tantalum

Smelter Name	Country
<b>AMG Brasil</b>	Brazil
<b>Changsha South Tantalum Niobium Co., Ltd.</b>	China
<b>CMT Rare Metal Advanced Materials (Hunan) Co., Ltd.</b>	China
<b>D Block Metals, LLC</b>	United States of America
<b>F&amp;X Electro-Materials Ltd.</b>	China
<b>FIR Metals &amp; Resource Ltd.</b>	China
<b>Global Advanced Metals Aizu</b>	Japan
<b>Global Advanced Metals Boyertown</b>	United States of America

<b>Guangdong Rising Rare Metals-EO Materials Ltd.</b>	China
<b>Hengyang King Xing Lifeng New Materials Co., Ltd.</b>	China
<b>Jiangxi Dinghai Tantalum &amp; Niobium Co., Ltd.</b>	China
<b>Jiangxi Suns Nonferrous Materials Co. Ltd.</b>	China
<b>Jiangxi Tuohong New Raw Material</b>	China
<b>Jiujiang Janny New Material Co., Ltd.</b>	China
<b>JiuJiang JinXin Nonferrous Metals Co., Ltd.</b>	China
<b>Jiujiang Tanbre Co., Ltd.</b>	China
<b>Jiujiang Zhongao Tantalum &amp; Niobium Co., Ltd.</b>	China
<b>KEMET de Mexico</b>	Mexico
<b>Materion Newton Inc.</b>	United States of America
<b>Metallurgical Products India Pvt., Ltd.</b>	India
<b>Mineracao Taboca S.A.</b>	Brazil
<b>Mitsui Kinzoku Company, Limited</b>	Japan
<b>Ningxia Orient Tantalum Industry Co., Ltd.</b>	China
<b>NPM Silmet OU</b>	Estonia
<b>PowerX Ltd.</b>	Rwanda
<b>STEREON Metals Hermsdorf GmbH</b>	Germany
<b>QuantumClean</b>	United States of America
<b>Resind Industria e Comercio Ltda.</b>	Brazil
<b>RFH Yancheng Jinye New Material Technology Co., Ltd.</b>	China
<b>Taki Chemical Co., Ltd.</b>	Japan
<b>TANIOBIS Co., Ltd.</b>	Thailand
<b>TANIOBIS GmbH</b>	Germany
<b>TANIOBIS Japan Co., Ltd.</b>	Japan
<b>TANIOBIS Smelting GmbH &amp; Co. KG</b>	Germany
<b>Telex Metals</b>	United States of America
<b>Ulba Metallurgical Plant JSC</b>	Kazakhstan
<b>XIMEI RESOURCES (GUANGDONG) LIMITED</b>	China
<b>XIMEI RESOURCES(GUIZHOU) TECHNOLOGY CO., LTD.</b>	China
<b>XinXing HaoRong Electronic Material Co., Ltd.</b>	China
<b>Yanling Jincheng Tantalum &amp; Niobium Co., Ltd.</b>	China

**Tin**

<b>Smelter Name</b>	<b>Country</b>
<b>Alpha Assembly Solutions Inc</b>	United States of America
<b>Aurubis Beerse</b>	Belgium
<b>Aurubis Berango</b>	Spain
<b>Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.</b>	China
<b>Chifeng Dajingzi Tin Industry Co., Ltd.</b>	China
<b>China Tin Group Co., Ltd.</b>	China
<b>CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda</b>	Brazil

<b>CRM Synergies EMEA, S.L.U.</b>	Spain
<b>CV Ayi Jaya</b>	Indonesia
<b>CV Venus Inti Perkasa</b>	Indonesia
<b>Dongguan Best Alloys Co., Ltd.</b>	China
<b>Dowa</b>	Japan
<b>DS Myanmar</b>	Myanmar
<b>Empresa Metallurgica Vinto</b>	Bolivia
<b>Estanho de Rondonia S.A.</b>	Brazil
<b>Fabrica Auricchio Industria e Comercio Ltda.</b>	Brazil
<b>Feinhutte Halsbrucke GmbH</b>	Germany
<b>Fenix Metals</b>	Poland
<b>Gejiu Non-Ferrous Metal Processing Co., Ltd.</b>	China
<b>Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.</b>	China
<b>Global Advanced Metals Greenbushes Pty Ltd.</b>	Australia
<b>Guangdong Hanhe Non-ferrous Metal Limited Company</b>	China
<b>Hebei Anruisai Renewable Resources Recycling Co.,Ltd.</b>	China
<b>HuiChang Hill Tin Industry Co., Ltd.</b>	China
<b>Jiangxi New Nanshan Technology Ltd.</b>	China
<b>Luna Smelter, Ltd.</b>	Rwanda
<b>Magnu's Mineraiis Metais e Ligas Ltda.</b>	Brazil
<b>Malaysia Smelting Corporation (MSC)</b>	Malaysia
<b>Malaysia Smelting Corporation Berhad (Port Klang)</b>	Malaysia
<b>Melt Metais e Ligas S.A.</b>	Brazil
<b>Metallic Resources, Inc.</b>	United States of America
<b>Mineracao Taboca S.A.</b>	Brazil
<b>Mining Minerals Resources SARRL</b>	Congo, Democratic Republic of the
<b>Minsur</b>	Peru
<b>Mitsubishi Materials Corporation</b>	Japan
<b>O.M. Manufacturing (Thailand) Co., Ltd.</b>	Thailand
<b>O.M. Manufacturing Philippines, Inc.</b>	Philippines
<b>Operaciones Metalurgicas S.A.</b>	Bolivia
<b>P Kay Metal, Inc</b>	United States of America
<b>Precious Minerals and Smelting Limited</b>	India
<b>PT Aries Kencana Sejahtera</b>	Indonesia
<b>PT Arsed Indonesia</b>	Indonesia
<b>PT Artha Cipta Langgeng</b>	Indonesia
<b>PT ATD Makmur Mandiri Jaya</b>	Indonesia
<b>PT Babel Inti Perkasa</b>	Indonesia
<b>PT Babel Surya Alam Lestari</b>	Indonesia
<b>PT Bangka Prima Tin</b>	Indonesia
<b>PT Bangka Serumpun</b>	Indonesia
<b>PT Bukit Timah</b>	Indonesia
<b>PT Cipta Persada Mulia</b>	Indonesia

PT Masbro Alam Stania	Indonesia
PT Menara Cipta Mulia	Indonesia
PT Mitra Stania Prima	Indonesia
PT Mitra Sukses Globalindo	Indonesia
PT Premium Tin Indonesia	Indonesia
PT Prima Timah Utama	Indonesia
PT Putera Sarana Shakti (PT PSS)	Indonesia
PT Rajawali Rimba Perkasa	Indonesia
PT Rajehan Ariq	Indonesia
PT Refined Bangka Tin	Indonesia
PT Sariwiguna Binasentosa	Indonesia
PT Stanindo Inti Perkasa	Indonesia
PT Sukses Inti Makmur (SIM)	Indonesia
PT Timah Tbk Kundur	Indonesia
PT Timah Tbk Mentok	Indonesia
PT Tinindo Inter Nusa	Indonesia
PT Tommy Utama	Indonesia
Resind Industria e Comercio Ltda.	Brazil
Rui Da Hung	Taiwan
Soft Metais Ltda.	Brazil
Super Ligas	Brazil
Takehara PVD Materials Plant / PVD Materials Division of MITSUI MINING & SMELTING CO., LTD.	Japan
Thai Nguyen Mining and Metallurgy Co., Ltd.	Vietnam
Thaisarco	Thailand
Tin Smelting Branch of Yunnan Tin Co., Ltd.	China
Tin Technology & Refining	United States of America
TRATHO Metal Quimica	Brazil
White Solder Metalurgia e Mineracao Ltda.	Brazil
Woodcross Smelting Company Limited	Uganda
Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	China
Yunnan Yunfan Non-ferrous Metals Co., Ltd.	China

**Tungsten**

Smelter Name	Country
A.L.M.T. Corp.	Japan
Asia Tungsten Products Vietnam Ltd.	Vietnam
China Molybdenum Tungsten Co., Ltd.	China
Chongyi Zhangyuan Tungsten Co., Ltd.	China
Cronimet Brasil Ltda	Brazil
Fujian Xinlu Tungsten Co., Ltd.	China
Ganzhou Huaxing Tungsten Products Co., Ltd.	China
Ganzhou Jiangwu Ferrotungsten Co., Ltd.	China

<b>Ganzhou Seadragon W &amp; Mo Co., Ltd.</b>	China
<b>Global Tungsten &amp; Powders LLC</b>	United States of America
<b>Guangdong Xianglu Tungsten Co., Ltd.</b>	China
<b>H.C. Starck Tungsten GmbH</b>	Germany
<b>Hubei Green Tungsten Co., Ltd.</b>	China
<b>Hunan Chenzhou Mining Co., Ltd.</b>	China
<b>Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch</b>	China
<b>Japan New Metals Co., Ltd.</b>	Japan
<b>Jiangwu H.C. Starck Tungsten Products Co., Ltd.</b>	China
<b>Jiangxi Gan Bei Tungsten Co., Ltd.</b>	China
<b>Jiangxi Tonggu Non-ferrous Metallurgical &amp; Chemical Co., Ltd.</b>	China
<b>Jiangxi Xinsheng Tungsten Industry Co., Ltd.</b>	China
<b>Jiangxi Yaosheng Tungsten Co., Ltd.</b>	China
<b>Jing Yuan Tungsten Technology Co., Ltd.</b>	Taiwan
<b>KENEE MINING VIETNAM COMPANY LIMITED</b>	Vietnam
<b>Kennametal Fallon</b>	United States of America
<b>Kennametal Huntsville</b>	United States of America
<b>Lianyou Metals Co., Ltd.</b>	Taiwan
<b>Lianyou Resources Co., Ltd.</b>	Taiwan
<b>Malipo Haiyu Tungsten Co., Ltd.</b>	China
<b>Masan High-Tech Materials</b>	Vietnam
<b>Niagara Refining LLC</b>	United States of America
<b>Philippine Bonway Manufacturing Industrial Corporation</b>	Philippines
<b>Philippine Carreytech Metal Corp.</b>	Philippines
<b>Philippine Chuangxin Industrial Co., Inc.</b>	Philippines
<b>Shinwon Tungsten (Fujian Shanghang) Co., Ltd.</b>	China
<b>TANIOBIS Smelting GmbH &amp; Co. KG</b>	Germany
<b>Tungsten Vietnam Joint Stock Company</b>	Vietnam
<b>Wolfram Bergbau und Hutten AG</b>	Austria
<b>Xiamen Tungsten (H.C.) Co., Ltd.</b>	China
<b>Xiamen Tungsten Co., Ltd.</b>	China