



Edgar Filing: RICHARDSON ELECTRONICS LTD/DE - Form SD

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

## Item 1.01 Conflict Minerals Disclosure and Report

Richardson Electronics, Ltd. ("we", "us", "the Company", and "our") is a leading global provider of engineered solutions, power grid and microwave tubes and related components, and customized display solutions, serving customers in the alternative energy, aviation, broadcast, communications, industrial, marine, medical, military, scientific, and semiconductor markets. Our strategy is to provide specialized technical expertise and "engineered solutions" based on our core engineering and manufacturing capabilities. We provide solutions and add value through design-in support, systems integration, prototype design and manufacturing, testing, logistics, and aftermarket technical service and repair.

We are committed to being a responsible corporate citizen and are opposed to human rights abuses such as those occurring in the Democratic Republic of the Congo (the "DRC"). We also take seriously our compliance obligations under Rule 13p-1 under the Securities Exchange Act of 1934, as amended, and Form SD (collectively, the "Conflict Minerals Rule"). To these ends, we have adopted and communicated to our suppliers and the public a company policy statement (the "Conflict Minerals Policy") for the supply chain of conflict minerals. As used herein and in the Conflict Minerals Policy, "conflict minerals" are columbite-tantalite (coltan), cassiterite, gold, wolframite and their derivatives tantalum, tin and tungsten, without regard to the location of origin of the minerals or derivative metals. The Conflict Minerals Policy includes, but is not limited to, our expectations that our suppliers share our philosophy and our buying from conflict-free sources.

As a distributor and manufacturer of electronic components, Richardson Electronics, Ltd. does not condone the use of any conflict minerals in the products we supply. Currently most manufacturers cannot provide detailed information as to the ultimate source of the minerals used in manufacturing electronic components because of the complex and fragmented supply chains involved. Similarly, companies like Richardson Electronics, which resell products manufactured by other companies, have virtually no visibility into the source of the minerals used by the manufacturers.

In cases where we buy gold, tin, tantalum or tungsten to use in our own manufacturing, we are working with our suppliers to ensure they share our philosophy and are buying from conflict-free sources. We are committed to taking proactive measures to ensure that products and raw materials we receive from our suppliers are responsibly sourced.

### Conflict Minerals Disclosure

As required by the Conflict Minerals Rule, a Conflict Minerals Report is provided as an Exhibit to this Form SD and is available at the following Internet website: <http://www.rell.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 report or the Conflict Minerals Report.

To comply with the final Conflict Minerals Rules, we conducted due diligence on the source and chain of custody of the conflict minerals that were necessary to the functionality or production of the products that we manufactured to determine whether these conflict minerals originated in the Democratic Republic of the Congo or an adjoining country (collectively, "Covered Countries") and financed or benefited armed groups in any of these countries.

Pursuant to SEC guidance issued April 29, 2014, and the SEC order issued May 2, 2014, the Company is not required to describe any of its products as "DRC conflict free" or "DRC conflict undeterminable" or "having not been found to be DRC conflict free," and therefore makes no conclusion in this regard in the report presented herein. Furthermore, given that the Company has not voluntarily elected to describe any of its products as "DRC conflict free," an independent audit of the report presented has not been conducted.



Item 2.01 Exhibits

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

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.

RICHARDSON ELECTRONICS, LTD.

Date: May 31, 2016 By: /s/ Edward J. Richardson  
Name: Edward J. Richardson  
Title: Chairman of the Board and Chief Executive Officer