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

FORM SD

Specialized Disclosure Report

LEGGETT & PLATT, INCORPORATED
(Exact name of the registrant as specified in its charter)

Missouri
(State or other jurisdiction of
incorporation or organization)

001-07845
(Commission
File Number)

44-0324630
(IRS Employer
Identification No.)

**No. 1 Leggett Road,
Carthage Missouri**
(Address of principal executive offices)

64836
(Zip Code)

John G. Moore
**Senior Vice President,
Chief Legal & HR Officer**
(417) 358-8131
(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, 2014.

Section 1 – Conflict Minerals Disclosure**Item 1.01 Conflict Minerals Disclosure and Report****Conflict Minerals Disclosure**

This Form SD of Leggett & Platt, Incorporated is filed pursuant to Rule 13p-1 promulgated under the Securities Exchange Act, as amended, for the reporting period from January 1, 2014 to December 31, 2014.

A copy of the Company's Conflict Minerals Report is provided as Exhibit 1.01 to this Form SD and incorporated by reference herein, and is publicly available at <http://www.leggett.com/SupplierDocuments/Corporate>. The website and information accessible through it are not incorporated into this document.

Item 1.02 Exhibit

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

Section 2 – Exhibits**Item 2.01 Exhibits**

The following exhibit is filed as part of this report.

<u>Exhibit No.</u>	<u>Description</u>
1.01	2014 Conflict Minerals Report of Leggett & Platt, Incorporated

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.

Date: May 29, 2015

Leggett & Platt, Incorporated

By: _____ /s/ **John G. Moore**
John G. Moore
Senior Vice President, Chief Legal & HR Officer

EXHIBIT INDEX

**Exhibit
No.**

Description

1.01	2014 Conflict Minerals Report of Leggett & Platt, Incorporated
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Leggett & Platt, Incorporated
Conflict Minerals Report
For the reporting period from January 1, 2014 to December 31, 2014

This Conflict Minerals Report (the “Report”) of Leggett & Platt, Incorporated (the “Company,” “we,” “our” or “us”) has been prepared pursuant to Rule 13p-1 and Form SD (collectively the “Rule”) promulgated under the Securities Exchange Act of 1934, as amended, for the reporting period from January 1, 2014 to December 31, 2014.

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. These minerals, which we collectively refer to in this Report as “Conflict Minerals,” are columbite-tantalite (coltan), cassiterite, gold, wolframite, or 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 the Congo, Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

The Company

We have over 130 manufacturing facilities located in 19 countries. Our manufacturing facilities are located in Austria, Belgium, Brazil, Canada, China, Croatia, Denmark, France, Germany, Hungary, India, Italy, Mexico, Poland, South Africa, South Korea, Switzerland, United Kingdom and the United States. Our continuing operations are organized into 18 business units, which are divided into 11 business groups under our four segments: Residential Furnishings; Commercial Products; Industrial Materials; and Specialized Products. Our Store Fixtures business unit is classified as a discontinued operation.

The Company’s Reasonable Country of Origin Inquiry

Reasonable Country of Origin Inquiry. We conducted an initial survey of sub-component parts and raw materials we purchased from suppliers. We assigned authority and responsibility to a person in each business unit to (a) compile an internal inventory of the parts and raw materials that we (i) knew or reasonably suspected contained necessary Conflict Minerals and (ii) knew or reasonably anticipated would be contained in a product, the manufacture of which is completed in the reporting period, and (b) identify the associated suppliers. Upon completion of the reporting period, we updated our internal inventory and supplier list. Based on our identified “in-scope” suppliers throughout the process, we conducted a good faith, reasonable country of origin inquiry (“RCOI”) regarding the Conflict Minerals. This RCOI was reasonably designed to determine whether the Conflict Minerals originated in the Covered Countries and whether the Conflict Minerals came from recycled or scrap sources. We adopted a supplier engagement approach. We sent requests to identified in-scope suppliers for verification of necessary Conflict Minerals and sourcing information, smelter or refiner (the “SOR”) and mine identification and recycled or scrap source determinations. Requests were sent through the iPoint Conflict Minerals Platform (the “iPCMP”), a web-based tool designed to communicate and track Conflict Minerals sourcing information throughout the mineral supply chain by use of the *Conflict Free Sourcing Initiative* (the “CFSI”) *Conflict Minerals Reporting Template* (the “CMRT”). Along with the CMRT request, we distributed correspondence to each in-scope supplier which briefly described the requirements of the Rule and contained an electronic link to our Conflict Minerals Policy (the “Policy”) and our Purchase Order Terms and Conditions (the “Purchase Order Terms”) (each discussed below).

Validation and Analysis of Supplier Responses. The supplier responses on the CMRT were validated, to the extent reasonably practicable, by analyzing each CMRT for the existence of “red flags.” Our “red flags” generally included: (i) the failure to answer mandatory questions; (ii) the lack of listing at least one SOR for each Conflict Mineral declared; (iii) the inconsistency of the CMRT response with our internal inventory; (iv) the declaration of some Conflict Minerals originating from Covered Countries and whether named SORs were certified under the *CFSI Conflict Free Smelter Program* (the “CFSP”); (v) the inclusion of Covered Countries on the SOR page of the CMRT; and (vi) the CMRT responses conflicting with one another. CMRT information was recorded in our Conflict Minerals Database (the “CM Database”). We prepared and delivered summary reports of supplier responses to senior management in our Conflict Minerals internal management structure.

Follow-up Request to Suppliers. Regarding the in-scope suppliers who did not respond, we first sent reminder requests through the iPCMP, and then if the supplier still did not respond we sent follow-up letters requesting a response. Also, we sent communication requesting the identity of the non-responsive supplier's supplier in an attempt to send the CMRT to such "sub-supplier" and to ascertain the identity of the SOR in our mineral supply chain. In the case of suppliers who responded on the CMRT with responses considered to contain "red flags," as discussed above, we sent follow-up communications requesting an explanation or elimination of any red flags.

Results of Reasonable Country of Origin Inquiry. We identified 392 in-scope suppliers and achieved an 81% response rate with 319 of these suppliers responding. We concluded that the Company has manufactured or contracted to manufacture products which contain Conflict Minerals that are necessary to their functionality or production. Based on the RCOI, the Company has determined that some of the component parts and raw materials within its products contain necessary Conflict Minerals that originated from recycled or scrap sources and some of the component parts and raw materials within its products contain necessary Conflict Minerals that originated outside the Covered Countries. These Conflict Minerals were outside the scope of the Company's due diligence process described below.

However, the Company knows or has reason to believe that a portion of its necessary Conflict Minerals originated or may have originated in the Covered Countries and knows or has reason to believe that those necessary Conflict Minerals may not be solely from recycled or scrap sources. Accordingly, with respect to these Conflict Minerals, the Company conducted due diligence on the source and chain of custody of such Conflict Minerals. These Conflict Minerals are contained in the "Covered Products" described below.

The Company's Due Diligence Process

Design of Due Diligence. We designed our due diligence measures to conform, in all material respects, to the framework in the *Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas: Second Edition*, including the related supplements on tin, tantalum, tungsten and gold (the "OECD Guidance").

Scope of Due Diligence. Our supply chain regarding the Covered Products is complex, and there are multiple parties in the supply chain between us and the original sources of Conflict Minerals. In this regard, we did not purchase necessary Conflict Minerals directly from SORs or mines. We must rely on our suppliers to provide information regarding the origin of Conflict Minerals included in the Covered Products. Moreover, we believe that SORs of the Conflict Minerals are best situated to identify the sources of Conflict Minerals, and we have taken steps attempting to identify the specific SORs of Conflict Minerals in our supply chain. We conducted due diligence on the source and chain of custody of Conflict Minerals with the objective of determining the origin of the Conflict Minerals contained in the Covered Products, and whether the Conflict Minerals directly or indirectly financed or benefited the Armed Groups, as defined in the Rule. We began our due diligence in July 2014 and it was substantially complete by mid-May 2015. We made resources available to support the due diligence process.

Our due diligence process is based on seeking data from our direct suppliers, and those suppliers seeking similar information within their supply chains to identify the original sources of the necessary Conflict Minerals. As a downstream purchaser of Conflict Minerals, our due diligence measures can provide only reasonable, not absolute, assurance regarding the source and chain of custody of the necessary Conflict Minerals.

The Company's Covered Products Subject to Due Diligence. The Company conducted due diligence on Conflict Minerals contained in products: (i) for which Conflict Minerals are necessary to the functionality or production of those products; (ii) that were manufactured, or contracted to be manufactured by us; (iii) for which the manufacture was completed during calendar year 2014; and (iv) with respect to Conflict Minerals in such products, for which we were unable to reasonably determine that all of the Conflict Minerals contained therein did not originate in the Covered Countries (or did come from recycled or scrap sources) (the "Covered Products"). The Covered Products are as follows:

COVERED PRODUCTS¹

Adjustable Bed Bases
Adjustable Table Components
Automotive Parts Storage Racks
Binding Machines (sews together mattress materials)
Blind-Stitch Machines (stitches mattress panels)
Bonded Urethane Carpet Pad
Border Machines (sews mattress borders)
Compressed Prime Foam Carpet Pad
Conveyor Machines (used in mattress manufacturing)
Electric Motors for Furniture Recliner Mechanisms
Electrical Components in Furniture Mechanisms
Electronics in Adjustable Beds
Electronics in Commercial Vehicles
Fastening Tools (used in manufacturing of furniture)
Flange Machines (sews non-woven material to mattress panels)
Furniture Recliner Lift Mechanisms
Furniture Recliner Mechanisms
General Sewing Machines
Glue Line Machines (glues mattress components)
Gusset Machines (creates gussets on pillow-top mattresses)
Handle Machines (attaches mattress handles)
Label and Repair Machines (attaches labels and/or repairs mattresses)
Machinery for the Oil & Gas Industry
Massage Motors for Adjustable Beds
Mattress Encasing Machines (compresses mattresses for fire retardant encasement)
Mattress Handling Machines
Mattress Spring Machines (produces mattress innersprings)
Mattress Testing Machines (tests finished mattresses)
Miter Machines (creates mitered corners of mattresses)
Motors for Adjustable Beds
Motors for Automotive Actuator Mechanisms
Motors for Automotive Lumbar Massage Mechanisms
Motors for Automotive Lumbar Mechanisms
Packaging Machines (packages mattresses)
Panel Cutting Machines (cuts mattress panels to specifications)
Phone Controllers for Adjustable Beds
Pneumatic Automotive Lumbar Mechanisms
Pneumatic Pumps for Automotive Lumbar Mechanisms
Power Actuators for Automotive Lumbar Mechanisms
Power Down Kits for Adjustable Beds
Quilting Machines (creates decorative patterns on mattresses)
Remote Controls for Furniture Recliner Mechanisms
Ruffler Machines (creates ruffled corners of mattresses)
Ski Tuning Machines
Store Fixtures with Lighting, Heating, Cooling and/or Carousel Elements
Tape Edge Machines (sews mattress panels to borders)
Wire Harnesses for Automotive Lumbar Mechanisms
Zipper Sewing Machines (creates zippers on mattresses)

¹ *The Covered Products also include certain replacement parts that are not specifically listed above.*

Description of Due Diligence Performed.

Below is a description of the measures we performed for the reporting period to exercise due diligence on the source and chain of custody of the necessary Conflict Minerals in the Covered Products.

OECD Guidance Step 1: Establish Strong Company Management Systems.

- **Adopt, and clearly communicate to suppliers and the public, a company policy for the supply chain of minerals originating from conflict-affected and high-risk areas.** We adopted and publicly communicated our Policy. The Policy extends to our suppliers and, generally: (i) prohibits human rights abuses associated with Conflict Minerals in the Covered Countries, including support to the Armed Groups; (ii) prohibits corruption, money-laundering and bribery in our mineral supply chain; (iii) requires suppliers to work with us to achieve conflict-free sourcing, and requires our suppliers to commit to responsible sourcing and legal compliance; and (iv) contains a grievance mechanism for interested parties to notify us of a violation of the Policy. If a supplier is not in compliance with our Policy, we expect to work with the supplier to achieve compliance, subject to the suspension and termination decisions made pursuant to our risk management plan, as described below. The Policy is posted to our website at <http://www.leggett.com/SupplierDocuments/Corporate> and was communicated through electronic distribution and a training presentation to business unit personnel and identified in-scope suppliers. The website and information accessible through it are not incorporated into this document.
- **Structure internal management to support supply chain due diligence.** We utilized various employees in establishing a cross-functional internal management structure to conduct Conflict Minerals due diligence.
 - **Business Unit Personnel.** We conducted a training presentation for business unit personnel regarding the responsibilities in conducting an internal inventory and the requirements of the Rule. We also surveyed personnel in each of our business units asking them to identify parts and raw materials containing necessary Conflict Minerals and the respective supplier of each such part or raw material. Business unit personnel also linked the parts and raw materials to finished products manufactured, or contracted to be manufactured, by the applicable business unit. Additionally, business unit personnel categorized “non-responsive” in-scope suppliers pursuant to our risk management plan, as discussed below, and provided alternative suppliers, in cases where known to exist. Finally, business unit personnel telephoned certain non-responsive suppliers in an attempt to assist the suppliers and obtain a response.
 - **L&P Global Services Group.** Our Global Services Group engaged with identified in-scope suppliers seeking information on the origin of the Conflict Minerals and the identity of the SORs that processed the Conflict Minerals, and whether the Conflict Minerals were derived from recycled or scrap sources. This group managed our account on the iPCMP. Finally, our Global Services Group engaged in follow-up due diligence communications with non-responsive suppliers, and those suppliers whose responses were considered to contain “red flags.”
 - **Legal Personnel.** Legal personnel validated and analyzed in-scope supplier responses on the CMRT and prepared internal reports to senior management. They also oversaw compliance with our Policy and with our Purchase Order Terms with suppliers regarding responsible Conflict Minerals sourcing.
 - **Senior Management.** Our CEO, President and SVP–Specialized Products & Industrial Materials participated in the review of: (i) the design of our Conflict Minerals due diligence process; (ii) our risk management plan; (iii) our Policy; (iv) our Purchase Order Terms; and (v) this Report. Also, the CEO and President sent communications to identified in-scope suppliers outlining our expectations of those suppliers in our mineral supply chain.
- **Establish a system of controls and transparency over the mineral supply chain.** We used the CMRT in an attempt to identify processing facilities in our supply chain as reported by our suppliers. The distribution of the CMRT included a letter which provided instructions on how to access the CMRT. Also, substantially all of the distributions listed the applicable parts from our CM Database. In addition, the distributions included a link to our Policy and Purchase Order Terms. The supplier responses on the CMRT were validated, to the extent

reasonably practicable, by analyzing the CMRT for the existence of “red flags.” We sent follow-up communications to non-responsive suppliers and to those suppliers whose responses were considered to contain red flags. Finally, we established a process to retain all Conflict Minerals information on the CMRT for a five-year period.

- **Strengthen company engagement with suppliers.** The CEO and President sent communication to identified in-scope suppliers outlining our expectations of those suppliers in our mineral supply chain. Also, we expanded our process for CMRT completion in our procurement process. We also attempted to create control over our suppliers and accountability and visibility into our mineral supply chain through our Purchase Order Terms which require our suppliers, generally, to (i) represent that, to the supplier’s knowledge, Conflict Minerals did not originate from the Covered Countries unless processed by a facility certified pursuant to the CFSP; (ii) abide by the terms of our Policy and commit to responsible sourcing and legal compliance; (iii) agree to retain our Conflict Minerals supply chain documentation for a period of five years, and allow us, at reasonable times, to inspect that documentation; and (iv) agree to work with sub-suppliers in an attempt to trace Conflict Minerals at least to the SOR level. In some cases, we have supplier purchase contracts, and we cannot unilaterally impose new contract terms or flow-down requirements that would otherwise compel these suppliers to support our due diligence efforts with respect to Conflict Minerals content. As we enter into new contracts, we intend, if reasonably practicable, to add such provisions. If a supplier is not in compliance with our Purchase Order Terms, we expect to work with the supplier to achieve compliance, subject to the suspension and termination decisions made pursuant to our risk management plan, as described below. Our Purchase Order Terms have been posted to our website at <http://www.leggett.com/SupplierDocuments/Corporate>. The website and information accessible through it are not incorporated into this document.
- **Establish a company-level, or industry-wide, grievance mechanism as an early-warning risk-awareness system.** We created a means by which employees, suppliers and other parties may contact us with potential violations of our Policy by providing contact information in the Policy itself, and posting the Policy to our website. The grievance mechanism provides for confidential and anonymous submissions; and an anti-retaliation provision for employees.

OECD Guidance Step 2: Identify and Assess Risk in the Supply Chain.

- **Identify risks in their supply chain as recommended in the Supplements.** We identified direct suppliers that supply component parts and raw materials to us that may contain Conflict Minerals through internal surveys conducted by each of our business units. We used the CMRT to identify processing facilities and country of origin information of our necessary Conflict Minerals if reported in our supply chain by our suppliers. We obtained information regarding CFSP compliant processing facilities by relying on public information provided by the CFSI. We also determined if the processing facilities adhere to responsible sourcing practices by cross-checking with the list of CFSP compliant processing facilities.
- **Assess risks of adverse impacts in light of the standards of their supply chain policy consistent with Annex II and the due diligence recommendations in the OECD Guidance.** We reviewed our suppliers’ responses on the CMRT including whether each supplier had adopted a conflict minerals policy. If no policy had been adopted, we requested that the supplier adopt a policy requiring conflict-free sourcing, and requested that each supplier post the policy to its website.

OECD Guidance Step 3: Design and Implement a Strategy to Respond to Identified Risks.

- **Report findings of the supply chain risk assessment to the designated senior management of the Company.** We prepared and delivered summary reports of supplier responses on the CMRT and our risk management plan activities to senior management in our Conflict Minerals internal management structure on a periodic basis.
- **Devise and adopt a risk management plan.** Although we desire to establish and maintain, where appropriate, long-term relationships with our suppliers as opposed to short-term or “one-off” contracts, we adopted a risk management plan to respond to suppliers who were unwilling to engage in the due diligence process, or provided responses that indicated that they may be sourcing from the Covered Countries.

Pursuant to this plan, we categorized non-responsive suppliers into three classes: Class 1 -continue trade with the supplier with risk mitigation efforts; Class 2 -temporarily suspend trade with the supplier with risk mitigation efforts; 3-6 month suspension period but only after notice of potential suspension and affirmative refusal of the supplier to cooperate; or Class 3 -terminate the supplier relationship but only after notice of potential termination and affirmative refusal of the supplier to cooperate. The suppliers were categorized by business unit personnel, and reviewed by our CEO and President and the applicable segment head. Also, we developed and executed specific action plans for non-responsive suppliers and suppliers who indicated that Conflict Minerals contained in the parts or raw materials supplied to us may have originated from the Covered Countries. These plans included additional specific written communications requesting responses and specific information from those non-responsive suppliers and suppliers whose responses were considered to contain red flags. In addition, direct telephone conversations were had with certain non-responsive suppliers.

- **Implement the risk management plan, monitor and track performance of risk mitigation efforts and report back to designated senior management.** As part of our adopted risk management plan, the Company distributed a training presentation to identified in-scope suppliers to: (i) reinforce the requirements of the Rule; (ii) communicate our Purchase Order Terms and Policy; (iii) encourage SORs in our supply chain to become compliant under the CFSP; (iv) notify suppliers of our Conflict Minerals grievance process; and (v) encourage suppliers to join industry groups to assist in due diligence. If the supplier responded on the CMRT and indicated that it had not adopted a policy that includes conflict-free sourcing, we requested, through separate follow-up communication, that the supplier adopt and post such a policy to its website. We also distributed a training presentation to our supply chain employees to reinforce the requirements of the Rule, our due diligence process, and our risk management plan. Also, business unit personnel developed a list of alternative suppliers, in cases where known to exist, to the identified non-responsive suppliers. These lists were reported to the CEO, President and each respective segment head for review.
- **Undertake additional fact and risk assessments for risks requiring mitigation, or after a change in circumstances.** In order to capture changes to the Company's mineral supply chain that occurred from time to time, we updated our internal inventory and in-scope supplier list through periodic reviews and revisions. We also repeated risk identification and assessment steps with respect to suppliers and parts that were added to the process throughout the reporting period in an attempt to prevent or mitigate adverse impacts.

OECD Guidance Step 4: Carry Out Independent Third Party Audit of SOR's Due Diligence Practices.

- Because we do not purchase Conflict Minerals directly from SORs or mines and have no contractual leverage with these entities, we did not have any direct engagement with SORs or mines. Moreover, we did not conduct any on-site visits of SORs or mines and did not develop any specific action plans with respect to these entities. We rely on the CFSP to coordinate third-party audits of these facilities. We rely on the publicly available results of the CFSP third party audits to validate the responsible sourcing practices of processing facilities in our supply chain. However, we did request that our in-scope suppliers encourage SORs in our mineral supply chain to undergo an audit in accordance with the CFSP. In addition, the Company did become a member of the CFSI and participated in Conflict Minerals discussions with the Automotive Industry Action Group and the Original Equipment Suppliers Association.

OECD Guidance Step 5: Report Annually on Supply Chain Due Diligence.

- We have adopted a process that contemplates filing of a Form SD and Conflict Minerals Report with the SEC on an annual basis. Our Form SD and Conflict Minerals Report are also available on our website.

Conclusions of Due Diligence

After exercising the due diligence described above, we were unable to reasonably determine that all of the Conflict Minerals contained in the Covered Products did not originate from the Covered Countries (or did come from

recycled or scrap sources). We were unable to determine all of the specific SORs that processed the Conflict Minerals in these Covered Products, and were unable to determine all of the countries of origin, and the specific mines or locations of origin with respect to all of the Conflict Minerals contained in all these products.

Many respondents did not provide verifiable SOR information or responded at a company-wide level which did not allow us to conclude that the Conflict Minerals were processed by any one particular SOR. Based on the information provided by our suppliers, we believe, to the extent reasonably known, that some of the facilities used to process some of the Conflict Minerals in our Covered Products include the SORs listed below. We do not believe that the below list represents all of the SORs that processed Conflict Minerals in our Covered Products in the reporting period, but rather only those SORs on the CFSI smelter list that we could verify relates to our specific products based on our suppliers' responses.

<u>Conflict Mineral</u>	<u>SOR Facility Name^{1, 3}</u>	<u>Country Location of SOR</u>
Tin	China Tin Group Co., Ltd.	China
Tin	CV United Smelting ²	Indonesia
Tin	EM Vinto ²	Bolivia
Tin	Geju Zi-Li	China
Tin	Malaysia Smelting Corporation (MSC) ²	Malaysia
Tin	Mineracao Taboca S.A. ²	Brazil
Tin	Minsur ²	Peru
Tin	Mitsubishi Materials Corporation ²	Japan
Tin	PT Bangka Kudai Tin	Indonesia
Tin	PT Bukit Timah ²	Indonesia
Tin	PT Koba Tin	Indonesia
Tin	PT Stanindo Inti Perkasa ²	Indonesia
Tin	PT Timah (Persero), Tbk ²	Indonesia
Tin	Thaisarco ²	Thailand
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	China
Tin	Yunnan Tin Company, Ltd. ²	China
Gold	Ohio Precious Metals, LLC ²	United States

¹ SOR facility names as reported on the CFSI smelter list.

² Denotes SORs are designated as compliant under the CFSP.

³ Based entirely on supplier's responses on the CMRT, the countries of origin of the Conflict Minerals processed by the named SORs contained in some of the component parts in some of our specific Covered Products included China and Indonesia.

Our efforts to determine the mine or location of origin of the necessary Conflict Minerals in the Covered Products with the greatest possible specificity consisted of the due diligence measures described in this Report. The Covered Products are often composed of multiple component parts containing one or more Conflict Minerals. We do not have sufficient information to determine the country of origin of all of the Conflict Minerals in all of the component parts in any Covered Product. As a result, we cannot conclusively determine the country of origin of all of the Conflict Minerals in any individual Covered Product or whether the manufacture of such Covered Products directly or indirectly financed or benefited the Armed Groups in the Covered Countries. Accordingly, we have reasonably determined that the Covered Products are "DRC conflict undeterminable," as defined in the Rule.

Improvements to Due Diligence

We have taken the following steps in an attempt to improve our due diligence measures and to further mitigate the risk that necessary Conflict Minerals contained in the Covered Products financed or benefited Armed Groups in the Covered Countries: (i) expanded our process for CMRT completion in our procurement process; (ii) refined our CM Database to assist us in maintaining an inventory of necessary Conflict Minerals in our products; (iii) increased staffing associated with Conflict Minerals compliance; (iv) upgraded our subscription to the iPCMP in an attempt to further automate our due diligence process and allow us to track product-specific data; and (v) supported the CFSI through our membership.

In addition, we expect to take the following steps to improve our due diligence measures: (i) continue to engage with in-scope suppliers to obtain current, accurate and complete information about our mineral supply chain; (ii) continue to engage with in-scope suppliers to implement responsible sourcing and to have them encourage their SORs to obtain a “conflict-free” designation under the CFSP; and (iii) determining whether to terminate certain non-responsive suppliers pursuant to our risk management plan.

Caution Concerning Forward-Looking Statements. Certain statements in this report may be “forward-looking” within the meaning of the Private Securities Litigation Reform Act of 1995. Words such as “expects,” “intends,” “plans,” “projects,” “believes,” “estimates,” “targets,” “anticipates,” and similar expressions are used to identify these forward-looking statements. Examples of forward-looking statements include statements relating to our future plans, and any other statement that does not directly relate to any historical or current fact. Forward-looking statements are based on our current expectations and assumptions, which may not prove to be accurate. These statements are not guarantees and are subject to risks, uncertainties and changes in circumstances that are difficult to predict. Actual outcomes and results may differ materially from these forward-looking statements. As a result, these statements speak only as of the date they are made and we undertake no obligation to update or revise any forward-looking statement, except as required by federal securities laws.