

ARROW ELECTRONICS INC  
Form SD  
May 31, 2016

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

FORM SD  
Specialized Disclosure Report

ARROW ELECTRONICS, INC.  
(Exact name of registrant as specified in its charter)

New York 1-4482 11-1806155  
(State or other jurisdiction of (Commission (I.R.S. Employer  
incorporation or organization) File Number) Identification Number)

9201 East Dry Creek Road, Centennial, Colorado 80112  
(Address of principal executive offices) (Zip Code)

Gregory Tarpinian  
Senior V.P., General Counsel and Secretary  
(303) 824-3753  
(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 (17CFR240.13p-1) for the reporting period from January 1 to December 31, 2015.

#### Introduction

Arrow Electronics, Inc. is filing this Form SD as required by Rule 13p-1 (“Conflict Minerals Rule”) under the Securities Exchange Act of 1934.

Arrow Electronics is a global provider of products, services and solutions to industrial and commercial users of electronic components and enterprise computing solutions. The information contained in this specialized disclosure report pertains to the products that have been assembled or modified (“manufactured”) by Arrow or one of its subsidiaries or business units: Global Lighting and Assembly; AePetsche Wire Preparation; AePetsche, North American Components, and European Components Connector Assembly; Power Supply Production Services; OEM Computing Solutions (OCS) Integration; Component Modification Services; Enterprise Computing Solutions (ECS), ATM, PEI-Genesis, Seneca, UR Group, and CPN/Denelex (collectively “Arrow” or the “Company”). Some of the products assembled and modified contain columbite-tantalite, cassiterite, wolframite, or gold, or their derivatives tin, tantalum, and tungsten, which are necessary to the functionality or production of the product (“Conflict Minerals<sup>1</sup>”).

<sup>1</sup> Note, the term “Conflict Minerals” refers to the named minerals and their derivatives. It does not infer that the procurement of such minerals or derivatives directly or indirectly financed or benefited armed groups in the DRC, Angola, Burundi, Central African Republic, Congo Republic, Rwanda, Sudan, Tanzania, Uganda, and Zambia. In

accordance with Rule 13p-1, minerals that originated in the DRC or adjoining country, and financed or benefited armed groups are deemed “Not Conflict Free.”

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## Section 1 - Conflict Minerals Disclosures

### Item 1.01 Conflict Minerals Disclosure and Report

#### Products Manufactured Using Conflict Minerals

In 2015, Arrow assembled or modified the following products: surface mount and leaded electronic components, including capacitors (aluminum electrolytic, tantalum electrolytic, ceramic, film and double layer- EDLC), resistors (thick film, thin film, current sensing and arrays), thermistors, varistors, inductors (metal composite, wire wound and MLI), ferrite chip beads, fuses and diodes; flat panel and touch screens, servers, personal computers and workstations, hard drives, motherboards, and kiosks; power supplies used in medical, telecom and industrial devices, modified headers, and flex strips; circular and rectangular connectors, and bundles of wire used to assemble sophisticated, high reliability electrical harnesses commonly used in aerospace, defense and other high reliability applications; and lighting assemblies used in street lights, stadiums, homes, and emergency vehicles (the “Products”). The Company determined that some of the Products contain Conflict Minerals.

#### Process to Identify the Country of Origin, Chain of Custody, and Facilities Used to Process the Minerals

Arrow does not directly purchase any Conflict Minerals from any source and does not knowingly procure any product containing Conflict Minerals from the “Covered Countries.” Arrow obtains all of the products it assembles and modifies from more than 870 suppliers. In 2015, Arrow manufactured the Products at its facilities in Reno, Nevada; Phoenix, Arizona; Solon, Ohio; Sunrise, Florida; Southaven, Mississippi; Nogales, Mexico; Viby, Denmark; Harrogate, United Kingdom; Cordoba, Spain; and Venlo, The Netherlands.

To develop its process to identify the country of origin and chain of custody of the Conflict Minerals, Arrow utilized the internationally recognized framework “OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas” (“OECD framework”).

Arrow utilized a risk-based approach to identify the suppliers of the parts used in the Products that are likely to contain Conflict Minerals and in accordance with the OECD framework conducted in good faith a reasonable country of origin inquiry. Arrow used Silicon Expert, a sophisticated components database and service provider, to request that each supplier provide the country of origin and chain of custody of the Conflict Minerals contained in the parts they supplied to Arrow. Suppliers were requested to respond with a completed Electronic Industry Citizenship Coalition “EICC-GeSI Due Diligence Request Template.”

#### Country of Origin Results

The Company performed its due diligence in accordance with the OECD framework. The Company used the EICC published Conflict-Free Smelter Program list to identify red flags with respect to the named country of origin and smelter list. The information received from the suppliers was reviewed for completeness and when necessary, Arrow conducted subsequent inquiries to get obtain additional information. However, despite this follow-up, in many instances, suppliers were unable to provide to the country of origin and or a smelter list.

At this time, the Company has no reason to believe that the information provided by the suppliers was unreliable or inaccurate. The following table is a list of smelters, provided to Arrow by its suppliers, of components used in the Products manufactured by Arrow in 2015.

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<sup>2</sup>. “Covered Countries” include the Democratic Republic of the Congo, Angola, Burundi, the Central African Republic, The Republic of Congo, Uganda, Rwanda, South Sudan, Tanzania and Zambia.

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Substance Name	Smelter Name	Smelter Location
Gold (Au)	ABC	ALBANIA
Gold (Au)	Abington Reldan Metals, LLC.	UNITED STATES
Gold (Au)	Acade Noble Metal (Zhao Yuan) Corporation	CHINA
Gold (Au)	Advanced Chemical Company	UNITED STATES
Gold (Au)	AGR Mathey	AUSTRALIA
Gold (Au)	Aida Chemical Industries Co., Ltd.	JAPAN
Gold (Au)	AIM	CANADA
Gold (Au)	Aktobe	KAZAKHSTAN
Gold (Au)	Aktyubinsk Copper Company TOO	KAZAKHSTAN
Gold (Au)	Al Etihad Gold Refinery DMCC	UNITED ARAB EMIRATES
Gold (Au)	Allgemeine Gold-und Silberscheideanstalt A.G.	GERMANY
Gold (Au)	Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN
Gold (Au)	Alpha	KOREA, UNITED STATES
Gold (Au)	Amalgamet Inc	PERU
Gold (Au)	AngloGold Ashanti Córrego do Sítio Mineração	BRAZIL
Gold (Au)	Anhui Tongling Nonferrous Metal Mining Co., Ltd.	CHINA
Gold (Au)	ANZ	AUSTRALIA
Gold (Au)	ANZ Banking	AUSTRIA
Gold (Au)	Argor-Heraeus SA	SWITZERLAND
Gold (Au)	Argor-Heraeus, HONG KONG	HONG KONG
Gold (Au)	Asahi Pretec Corporation	JAPAN
Gold (Au)	Asahi Refining Canada Limited	CANADA
Gold (Au)	Asahi Refining USA Inc.	UNITED STATES
Gold (Au)	Asaka Riken Co., Ltd.	JAPAN
Gold (Au)	Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	TURKEY
Gold (Au)	Atotech	GERMANY
Gold (Au)	Audiua, Escardida	CHILE
Gold (Au)	Aurubis AG	GERMANY
Gold (Au)	AXIS MATERIAL LIMITED	JAPAN
Gold (Au)	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES
Gold (Au)	Bangkok Assay	THAILAND
Gold (Au)	Bank of Switzerland	SWITZERLAND
Gold (Au)	Batu Hijau Gold/Copper Mining	INDONESIA
Gold (Au)	Bauer Walser AG	GERMANY
Gold (Au)	Best Metais e Soldas SA	BRAZIL
Gold (Au)	Boliden AB	SWEDEN
Gold (Au)	Boston Metal	KOREA
Gold (Au)	BR Industries	INDIA
Gold (Au)	Butterworth Smelter	MALAYSIA
Gold (Au)	C. Hafner GmbH + Co. KG	GERMANY
Gold (Au)	Caridad	MEXICO

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Gold (Au)	CCR Refinery - Glencore Canada Corporation	CANADA
Gold (Au)	Cendres + Métaux SA	SWITZERLAND
Gold (Au)	CHALCO Yunnan Copper Co. Ltd.	CHINA
Gold (Au)	Changsha South Tantalum Niobium Co., Ltd.	CHINA
Gold (Au)	Cheng Yang	TAIWAN
Gold (Au)	Chengfeng Metals Co Pte Ltd	CHINA
Gold (Au)	CHENGGONG TECHNOLOGY CO.,LTD.	UZBEKISTAN
Gold (Au)	Chimet S.p.A.	ITALY
Gold (Au)	China Rare Metal Materials Company	CHINA
Gold (Au)	China Tin Group Co., Ltd.	CHINA
Gold (Au)	Chugai Mining	JAPAN
Gold (Au)	CNMC (Guangxi) PGMA Co., Ltd.	CHINA
Gold (Au)	Conghua Tantalum and Niobium Smeltry	CHINA
Gold (Au)	Cookson Group	SPAIN
Gold (Au)	Cooper Santa	BRAZIL
Gold (Au)	CV Serumpun Sebalai	INDONESIA
Gold (Au)	Daejin Indus Co., Ltd.	SOUTH KOREA
Gold (Au)	Daye Nonferrous Metals Mining Ltd.	CHINA
Gold (Au)	Dayu Weiliang Tungsten Co., Ltd.	CHINA
Gold (Au)	Do Sung Corporation	KOREA, REPUBLIC OF
Gold (Au)	Doduco GmbH	GERMANY
Gold (Au)	Dowa	JAPAN
Gold (Au)	DSC (Do Sung Corporation)	KOREA
Gold (Au)	Eco-System Recycling Co., Ltd.	JAPAN

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Gold (Au)	Elemetal Refining, LLC	UNITED STATES
Gold (Au)	EM Vinto	BOLIVIA
Gold (Au)	Emirates Gold DMCC	UNITED ARAB EMIRATES
Gold (Au)	Empresa Metallurgica Vinto, Empresa ciol de Fundiciones (EF), Complejo Metalurico Vinto S.A.	BOLIVIA
Gold (Au)	Engelhard London	UNITED KINGDOM
Gold (Au)	ERCEI	FRANCE
Gold (Au)	Estanho de Rondônia S.A.	BRAZIL
Gold (Au)	Ethiopian Minerals Development Share Company	ETHIOPIA
Gold (Au)	F&X Electro-Materials Ltd.	CHINA
Gold (Au)	Faggi Enrico S.p.A.	ITALY
Gold (Au)	Feinhütte Halsbrücke GmbH	GERMANY
Gold (Au)	Fenix Metals	POLAND
Gold (Au)	Fidelity Printers and Refiners Ltd.	ZIMBABWE
Gold (Au)	FSE Novosibirsk Refinery	RUSSIA
Gold (Au)	Fujian Jinxin Tungsten Co., Ltd.	CHINA
Gold (Au)	Gansu Seemine Material Hi-Tech Co., Ltd.	CHINA
Gold (Au)	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA
Gold (Au)	Gauteng refinery	SOUTH AFRICA
Gold (Au)	Geib Refining Corporation	UNITED STATES

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Gold (Au)	Gejiu Zili Mining And Metallurgy Co., Ltd.	CHINA
Gold (Au)	Global Tungsten & Powders Corp.	UNITED STATES
Gold (Au)	Gold Mining in Shandong (Laizhou) Limited Company	CHINA
Gold (Au)	Great Wall Precious Metals Co., Ltd. of CBPM	CHINA
Gold (Au)	Guangdong Gaoyao Co	CHINA
Gold (Au)	Guangdong Xianglu Tungsten Industry Co., Ltd.	CHINA
Gold (Au)	Guoda Safina High-Tech Environmental Refinery Co., Ltd.	CHINA
Gold (Au)	H. DRIJFHOUT & ZOON-AMSTERDAM-MELTERS (within octagon)	NETHERLANDS
Gold (Au)	Hangzhou Fuchunjiang Smelting Co., Ltd.	CHINA
Gold (Au)	Heimerle + Meule GmbH	GERMANY
Gold (Au)	Henan Zhongyuan Gold Smelter of Zhongjin Gold Co. Ltd.	CHINA
Gold (Au)	Heraeus Ltd. Hong Kong	HONG KONG, TAIWAN, GERMANY, SINGAPORE, KOREA, CHINA
Gold (Au)	Heraeus Materials Singapore Pte, Ltd.	SINGAPORE
Gold (Au)	Heraeus Precious Metals GmbH & Co. KG	CHINA, GERMANY
Gold (Au)	Huichang Jinshunda Tin Co., Ltd.	CHINA
Gold (Au)	Hunan Chenzhou Mining Co., Ltd.	CHINA
Gold (Au)	Hwasung CJ Co., Ltd.	KOREA, REPUBLIC OF
Gold (Au)	Inner Mongolia Qiankun Gold and Silver Refinery Share Company Limited	CHINA
Gold (Au)	Ishifuku Metal Industry Co., Ltd.	JAPAN
Gold (Au)	Istanbul Gold Refinery	TURKEY
Gold (Au)		