

SEC Reporting & Compliance Alert

If you have any questions regarding the matters discussed in this memorandum, please contact the attorneys listed on the last page or call your regular Skadden contact.

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Conflict Minerals Disclosures Due May 31, 2019

As a reminder, conflict minerals disclosures on Forms SD are required to be filed with the Securities and Exchange Commission (SEC) no later than May 31, 2019. There have not been any notable regulatory updates related to the conflict minerals rules since April 2017. At that time, the SEC's Division of Corporation Finance issued blanket no-action relief, saying it would not recommend enforcement against companies for not complying with the requirement to conduct due diligence and file a "conflict minerals report," although it would expect companies with conflict minerals in their supply chains to file a Form SD. (See our client alert "[SEC Staff Provides Relief From Conflict Minerals Rule](#)," April 11, 2017.) Even though the no-action relief remains in effect, many companies have continued to conduct due diligence and file full conflict minerals reports with the SEC, given that they already have diligence processes in place and that some stakeholders have come to expect the reports.

For additional information concerning the conflict minerals rules, please see our other client alerts:

- "[SEC Adopts Conflict Minerals Rules](#)," September 5, 2012
- "[SEC Staff Issues Conflict Minerals & Resource Extraction Payments Disclosure Guidance](#)," June 3, 2013
- "[SEC Staff Issues Statement on Conflict Minerals Ruling](#)," April 30, 2014

If you have any questions or require assistance with your conflict mineral reporting requirements, please feel free to contact [Brian Breheny](#) or [Hagen Ganem](#).

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