

SEC Reporting & Compliance Alert

May 6, 2025

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

This memorandum is provided by Skadden, Arps, Slate, Meagher & Flom LLP and its affiliates for educational and informational purposes only and is not intended and should not be construed as legal advice. This memorandum is considered advertising under applicable state laws.

One Manhattan West
New York, NY 10001
212.735.3000

1440 New York Ave., NW
Washington, DC 20005
202.371.7000

Conflict Minerals Disclosures Due June 2, 2025

Conflict minerals disclosures on Forms SD are required to be filed with the Securities and Exchange Commission (SEC) no later than June 2, 2025.¹

The conflict minerals disclosure rules and related guidance have remained at a practical standstill for the past few years following legal challenges to the rules and a remand to the SEC for further action. As a result, there have been no notable regulatory updates since the April 2017 no-action relief statement by the SEC's Division of Corporation Finance. In that statement, the division indicated it would not recommend enforcement action against companies for not complying with Item 1.01(c) of Form SD — the provision requiring companies to conduct due diligence to determine the source and custody of conflict minerals in their supply chain and to prepare a “conflict minerals report” describing their efforts and findings. (See our April 11, 2017, client alert “[SEC Staff Provides Relief From Conflict Minerals Rule.](#)”)

Companies are still required to comply with the requirements of Items 1.01(a) and (b) of Form SD. This means companies that determine conflict minerals are necessary to the functionality or production of their products still are required to make a good faith effort to determine the country of origin of those minerals and to briefly describe their efforts and findings in a Form SD filed with the SEC and made available on the company's website.

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).

Companies and their advisers with questions regarding conflict mineral reporting requirements should contact outside counsel.

¹ Reflects filing date falling on a weekend or federal holiday, which extends the filing deadline to the next business day.

Conflict Minerals Disclosures

Due June 2, 2025

Contacts

Brian V. Breheny

Partner / Washington, D.C.
202.371.7180
brian.breheny@skadden.com

Raquel Fox

Partner / Washington, D.C.
202.371.7050
raquel.fox@skadden.com

Andrew J. Brady

Of Counsel / Washington, D.C.
202.371.371.7513
andrew.brady@skadden.com

Caroline S. Kim

Counsel / Washington, D.C.
202.371.7555
caroline.kim@skadden.com

Leo W. Chomiak

Associate / Washington, D.C.
202.371.7511
leon.chomiak@skadden.com

Jeongu Gim

Associate / Washington, D.C.
202.371.7223
jeongu.gim@skadden.com

Nicholas D. Lamparski

Associate / Washington, D.C.
202.371.7323
nicholas.lamparski@skadden.com

Khadija L. Messina

Associate / Chicago
312.407.0116
khadija.messina@skadden.com

Joshua Shainess

Associate / Washington, D.C.
202.371.7594
joshua.shainess@skadden.com

Sydney E. Smith

Associate / Washington, D.C.
202.371.7333
sydney.smith@skadden.com

Kyle Wiley

Associate / Washington, D.C.
202.371.7351
kyle.wiley@skadden.com