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

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**FORM SD**

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**SPECIALIZED DISCLOSURE REPORT**

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**SYNOPSYS, INC.**

(Exact name of Registrant as specified in charter)

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**Delaware**  
(State or other jurisdiction  
of incorporation)

**000-19807**  
(Commission  
File Number)

**56-1546236**  
(I.R.S. Employer  
Identification No.)

**690 East Middlefield Road**  
**Mountain View, California 94043**  
(Address of principal executive offices)

**John F. Runkel, Jr.**  
**General Counsel and Corporate Secretary**  
**Synopsys, Inc.**  
**690 East Middlefield Road**  
**Mountain View, California 94043**  
**(650) 584-5000**

(Name and telephone number, including area code, of the person to contact in connection with this report.)

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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, 2022.
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**Section 1 – CONFLICT MINERALS DISCLOSURE**

**Item 1.01 Conflict Minerals Disclosure and Report**

***Conflict Minerals Disclosure***

Synopsys, Inc. (Synopsys) has filed a Conflict Minerals Report as Exhibit 1.01 to this Form SD. The report is also publicly available on Synopsys' website at <https://www.synopsys.com/~/media/Synopsys/Investor%20Relations/2018/2018%20Conflict%20Minerals%20Report.pdf>.

**Item 1.02 Exhibit**

The Conflict Minerals Report required by Item 1.01 is filed as Exhibit 1.01 to this Form SD.

**Section 3 – EXHIBITS**

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**Synopsys, Inc.  
Conflict Minerals Report  
For The Year Ended December 31, 2022**

Synopsys, Inc. (referred to as “Synopsys,” “we,” “us,” and “our” in this report) has submitted this Conflict Minerals Report for the year ended December 31, 2022 in order to comply with Rule 13p-1 under the Securities Exchange Act, as amended. Rule 13p-1 was adopted by the Securities and Exchange Commission (SEC) to implement conflict minerals disclosure requirements, as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. Rule 13p-1 imposes reporting obligations on SEC registrants whose manufactured products contain conflict minerals that are necessary to the functionality or production of their products. Conflict minerals are currently defined as gold, cassiterite, columbite-tantalite (coltan), wolframite, and their derivatives, which are limited to tin, tantalum, and tungsten (which, together with gold, are referred to as the 3TG metals). The definition includes these minerals regardless of their geographic origin or whether or not they fund armed conflict.

In accordance with Rule 13p-1, 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 we manufactured, or contracted to manufacture, in order to ascertain whether these conflict minerals

## ***Conclusion of Reasonable Country of Origin Inquiry***

For this reporting year, we sought to survey all of our suppliers regarding the sources of their 3TG metals by retaining a third-party service provider. A number of our suppliers provided complete data, while others did not provide us with sufficient data on the smelters and refiners in their supply chains. In addition, a number of the smelters and refiners identified by our suppliers have not yet successfully completed an assessment against the applicable standard of the Responsible Minerals Initiative's (RMI) Responsible Minerals Assurance Process (RMAP) or an equivalent cross-recognized assessment, resulting in uncertainty about the mines or locations of origin for the minerals used by these smelters and refiners. Based upon the results of our reasonable country of origin inquiry, we have reason to believe that the 3TG metals contained in our hardware products may have originated from the Covered Countries.

## **2. Due Diligence Design**

Synopsys' conflict minerals program has been designed to materially conform to the framework set forth in [RMI's Responsible Minerals Assurance Process \(RMAP\)](#) and the related, [RMI's Responsible Minerals Assurance Process \(RMAP\)](#) and, [RMI's Responsible Minerals Assurance Process \(RMAP\)](#).

## **3. Due Diligence Measures Performed**

### **3.1 Management Systems**

#### ***Conflict Minerals Policy***

Synopsys maintains a conflict minerals policy that sets forth our expectation that our suppliers will assist us in our supply chain due diligence efforts. Our policy is publicly available on our website at [www.synopsys.com/~/media/Synopsys/Corporate%20Information/Conflict%20Minerals%20Policy.pdf](#).

#### ***Conflict Minerals Program Governance Team***

Our conflict minerals program governance team maintains our conflict minerals policy and manages our conflict minerals compliance program. The team consists of representatives from our ESG Leadership Committee, including representatives from legal, finance, and hardware operations, and is sponsored by our ESG Management Team.

#### ***Control Systems***

As we do not have a direct relationship with 3TG metal smelters or refiners, and because our hardware business does not represent a significant part of our business, in comparison to our software products and services, we rely on industry-wide initiatives to improve supply chain transparency and encourage responsible sourcing of minerals, particularly the RMI. For this reporting year, we used the RMI Conflict Minerals Reporting Template (CMRT) to survey our suppliers regarding the origin of the 3TG metals contained in the products supplied to us. The RMI identifies upstream participants in the supply chain and validates smelters and refiners as conformant with RMAP standards. As part of our due diligence program for this reporting year, we checked smelters and refiners identified by our suppliers against the RMI's conformant smelter and refiner lists (Conformant Smelter and Refiner Lists).

#### ***Supplier Engagement***

For this reporting year, our third-party service provider conducted outreach with our suppliers and managed the supplier survey process. The service provider provided our suppliers with access to its conflict minerals supplier resource center, through which our suppliers were able to review our conflict minerals policy, receive training regarding compliance with our conflict minerals program, and obtain information on conflict minerals reporting requirements, the RMAP, and the CMRT. The service provider oversaw the surveying of our suppliers, which included e-mail and phone contact escalations for unresponsive suppliers and requests for further information or clarification from suppliers that provided incomplete or inconsistent responses.

### ***Grievance Mechanism***

Our public whistleblower hotline is available to report, confidentially and anonymously, violations of our policies or unethical behavior, including grievances related to conflict minerals due diligence and reporting. Our hotline is hosted on a third-party server at

### ***Record Maintenance***

We stored the survey responses we received from our suppliers in an internal electronic file library. These records will be maintained for at least five years, in accordance with our internal document retention policy.

## **3.2 Identifying and Assessing Risk in the Supply Chain**

We rely on our suppliers to provide us with information about the sources of the 3TG metals contained in the products they supply.

### ***Identifying Relevant Suppliers***

For this reporting year, we sought to survey all of our suppliers. Additionally, we identified high-priority suppliers that made up a significant percentage of our hardware product spending (High-Priority Suppliers). High-Priority Suppliers received an enhanced review in our due diligence process, which we believe is consistent with a risk-based approach to due diligence.

### ***Information Requests***

We used the CMRT to survey our suppliers. The CMRT facilitates the transfer of information regarding supplier sourcing of 3TG metals.

### ***Reviewing Supplier Information***

Our third-party service provider reviewed our suppliers' responses for completeness and consistency. Synopsys also reviewed these responses against an internally developed list of "red flags" designed to identify responses that are incomplete, implausible, or that indicate heightened risk, such as responses reporting sourcing of 3TG metal from a Covered Country. High-Priority Suppliers were reviewed for additional red flags.

### ***Smelter and Refiner Assessment***

Our third-party service provider reviewed a consolidated list of the smelters and refiners identified by our suppliers and compared the smelter and refiner names against the RMI's list of standard smelter and refiner names (the Smelter Reference List) in order to assess the quality of the information provided to us and determine whether all identified smelters and refiners were, in fact, smelters and refiners. Our third-party service provider further compared smelter and refiner names against the Conformant Smelter and Refiner Lists. Validation under the RMAP is voluntary, and the RMAP makes no conclusions about the conflict status of sourcing by a smelter or refiner that is not on the Conformant Smelter and Refiner Lists. We also reviewed the countries of the identified smelters and refiners, as provided by our suppliers, to see if they are located in a high-risk area, such as in or adjacent to the Covered Countries.

## **3.3 Designing and Implementing a Strategy to Respond to Risks**

Our conflict minerals program includes risk mitigation measures. Our expectations regarding cooperation with our due diligence process were communicated to our suppliers in our conflict minerals policy (available on our website and through our third-party service provider's conflict minerals supplier resontains0 -6-1.2003 TD0 r),0v),eTsu2CebSiRefinc smelnevant60.1(T)18.2(to surveshe)Tj-s, to see ough our thirandpproacht to inTG met1 10.6(

### 3.4 Supporting Independent Third-Party Audits of Supply Chain Due Diligence at Identified Points in the Supply Chain

We do not have a direct relationship with the smelters or refiners of the 3TG metals contained in our products, and we therefore did not perform or direct audits of these entities. We relied on the RMI to audit smelters and refiners and validate them as conformant with RMAP standards and to identify smelters and refiners that had successfully completed an equivalent cross-recognized assessment.

### 3.5 Reporting on Supply Chain Due Diligence

This Conflict Minerals Report is publicly available on our website at <https://www.ams.com/ba-...>

## 4. Due Diligence Results

### *Smelters and Refiners*

We received CMRT responses from approximately 91% of our suppliers. These responses encompass products that account for over 99% of our spending on hardware products for this reporting year.

Our suppliers identified 246 gold refiners, 51 tantalum smelters, 166 tin smelters, and 68 tungsten smelters. We compared these identified smelters and refiners against the RMI's Conformant Smelter and Refiner Lists. As of May 9, 2023, approximately 41% of gold refiners, 63% of tantalum smelters, 36% of tin smelters, and 50% of tungsten smelters have successfully completed an assessment against the applicable RMI standard or an equivalent cross-recognized assessment.

### *Countries of Origin of Conflict Minerals*

Although we reviewed the countries of the smelters and refiners identified by our suppliers, the locations of these facilities do not necessarily indicate the countries of origin of the 3TG metals processed by such facilities. If a smelter or refiner is not conformant with RMAP standards or certified under a similar initiative, it may not be possible to draw a reliable conclusion about the ultimate source of its metals.

In addition, a majority of suppliers provided smelter and refiner information at a company or divisional level, rather than at a product level. We therefore cannot be sure whether all of the identified smelters and refiners provided 3TG metal that was included in the products actually supplied to us. For these reasons, we have incomplete information regarding the countries of origin of our conflict minerals.

### *Efforts to Determine Mines or Locations of Origin*

As a downstream company that is separated by multiple levels in the supply chain from the smelters and refiners that supply materials for our products, we have determined that surveying our suppliers with the CMRT and collecting the resulting smelter and refiner information is the most reasonable available approach to determining the mines or locations of origin of 3TG metals in our supply chain. We rely on the RMI to audit smelters and refiners that source 3TG metals and validate them as conformant with RMAP standards and to identify smelters and refiners that have successfully completed an equivalent cross-recognized assessment.

## 5. Further Steps to Mitigate Risk

We intend to take the following steps to help mitigate the risk that the necessary conflict minerals in our products could finance or benefit armed groups in the Covered Countries.

- Continue to engage with our suppliers in order to attempt to increase their response rate and to improve the content of their CMRT responses.
- Monitor suppliers that indicate potential sourcing of 3TG metals from the Covered Countries to determine whether such sourcing is being conducted in a responsible way, such as through smelters and refiners that have successfully completed an assessment against the applicable RMAP standard or an equivalent cross-recognized assessment.

- Evaluate, in light of all relevant factors, whether to continue our relationship with suppliers that are unresponsive to our requests for conflict minerals information or that present a heightened risk of sourcing linked to conflict without a plan to remediate such risk.

#### FORWARD-LOOKING STATEMENTS

Statements relating to further risk mitigation and certain other statements are forward-looking in nature and are based on Synopsys' current expectations or beliefs. These forward-looking statements are not a guarantee of performance and are subject to a number of uncertainties and other factors that may be outside of Synopsys' control and that could cause actual events to differ materially from those expressed or implied by the statements made herein.

#### DOCUMENTS INCORPORATED BY REFERENCE

Unless otherwise stated herein, any documents, third-party materials or references to websites (including Synopsys') are not incorporated by reference in, or considered to be a part of this Conflict Minerals Report, unless expressly incorporated by reference herein.