

ARROW ELECTRONICS INC  
Form SD  
June 01, 2015

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<br>(State or other jurisdiction of<br>incorporation or organization) | 1-4482<br>(Commission<br>File Number) | 11-1806155<br>(I.R.S. Employer<br>Identification Number) |
|---|---------------------------------------|--|

|  |                     |
|--|---------------------|
| 9201 East Dry Creek Road, Centennial, Colorado<br>(Address of principal executive offices) | 80112<br>(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, 2014.

#### 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) 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,

Edgar Filing: ARROW ELECTRONICS INC - Form SD

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.”

---

## Section 1 - Conflict Minerals Disclosures

### Item 1.01 Conflict Minerals Disclosure and Report

#### Products Manufactured Using Conflict Minerals

In 2014, 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, wirewound 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.” “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. Arrow obtains all of the products it assembles and modifies from more than 900 suppliers. In 2014, Arrow manufactured the Products at its facilities in Reno, Nevada; Phoenix, Arizona; Solon, Ohio; Sunrise, Florida; Southhaven, 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 obtain additional information. However, despite this follow-up, in many instances, suppliers were unable to provide 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 2014.

| Substance Name | Smelter Name   | Smelter Location   |
|----------------|--|--------------------|
| Gold (Au)      | Advanced Chemical Company  | UNITED STATES      |
| Gold (Au)      | AGR Mathey   | AUSTRALIA          |
| Gold (Au)      | Aida Chemical Industries Co., Ltd.   | JAPAN              |
| Gold (Au)      | Aktyubinsk Copper Company TOO  | KAZAKHSTAN         |
| Gold (Au)      | Allgemeine Gold- und Silberscheideanstalt A.G.   | GERMANY            |
| Gold (Au)      | Almalyk Mining and Metallurgical Complex (AMMC)  | UZBEKISTAN         |
| Gold (Au)      | AngloGold Ashanti  | BRAZIL             |
| Gold (Au)      | Anhui Tongling Nonferrous Metal Mining Co., Ltd.   | CHINA              |
| Gold (Au)      | ANZ (Perth Mint 4N)  | AUSTRALIA          |
| Gold (Au)      | ARGOR S.A. CHIASSO-ASA   | SWITZERLAND        |
| Gold (Au)      | Asahi Pretec Corp  | JAPAN              |
| Gold (Au)      | Asaka Riken Co., Ltd.  | JAPAN              |
| Gold (Au)      | ATAkulche  | TURKEY             |
| Gold (Au)      | Atasay Kuyumculuk Sanayi Ve Ticaret A.S.   | TURKEY             |
| Gold (Au)      | Aurubis AG   | GERMANY            |
| Gold (Au)      | Bangko Sentral ng Pilipinas (Central Bank of the Philippines)  | PHILIPPINES        |
| Gold (Au)      | Bauer Walser AG  | GERMANY            |
| Gold (Au)      | Boliden AB   | SWEDEN             |
| Gold (Au)      | C. Hafner GmbH + Co. KG  | GERMANY            |
| Gold (Au)      | Caridad  | MEXICO             |
| Gold (Au)      | CHALCO Yunnan Copper Co. Ltd.  | CHINA              |
| Gold (Au)      | Chimet S.p.A.  | ITALY              |
| Gold (Au)      | China's Shandong Gold Mining Co., Ltd  | CHINA              |
| Gold (Au)      | Chugai Mining  | JAPAN              |
| Gold (Au)      | Daejin Indus Co., Ltd.   | KOREA, REPUBLIC OF |
| Gold (Au)      | Daye Non-Ferrous Metals Mining Ltd.  | CHINA              |
| Gold (Au)      | Do Sung Corporation  | KOREA, REPUBLIC OF |
| Gold (Au)      | Doduco   | GERMANY            |
| Gold (Au)      | Dosung metal   | KOREA, REPUBLIC OF |
| Gold (Au)      | Dowa Kogyo k.k,Dowa Metals & Mining Co. Ltd,Dowa Metanix Co.Ltd,Dowa Metalmine co.ltd,Dowa Metals & Mining. Kosak Seiren,Dowa Holdings Co. Ltd | JAPAN              |



Edgar Filing: ARROW ELECTRONICS INC - Form SD

|           |   |                    |
|-----------|---|--------------------|
| Gold (Au) | ECO SYSTEM RECYCLING CO.,LTD  | JAPAN              |
| Gold (Au) | Faggi Enrico S.p.A.   | ITALY              |
| Gold (Au) | FSE Novosibirsk Refinery  | RUSSIAN FEDERATION |
| Gold (Au) | Fujian Zijin mining stock company gold smelter                        | CHINA              |
| Gold (Au) | Gansu Seemine Material Hi-Tech Co., Ltd.                              | CHINA              |
| Gold (Au) | Geib Refining Corporation   | UNITED STATES      |
| Gold (Au) | Gold Mining in Shandong (Laizhou) Limited Company                     | CHINA              |
| Gold (Au) | Guangdong Jinding Gold Limited  | CHINA              |
| Gold (Au) | Guoda Safina High-Tech Environmental Refinery Co., Ltd.               | CHINA              |
| Gold (Au) | Hangzhou Fuchunjiang Smelting Co., Ltd.                               | CHINA              |
| Gold (Au) | Heimerle + Meule GmbH   | GERMANY            |
| Gold (Au) | Henan Zhongyuan Gold Smelter of Zhongjin Gold Corporation Limited     | CHINA              |
| Gold (Au) | Heraeus Ltd.  | HONG KONG          |
| Gold (Au) | HLH (Heraeus Limited Hongkong)  | HONG KONG          |
| Gold (Au) | Heraeus Precious Metals GmbH & Co. KG                                 | CHINA              |
| Gold (Au) | Hunan Chenzhou Mining Industry Co. Ltd.                               | CHINA              |
| 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) | Japan Mint  | JAPAN              |
| Gold (Au) | JCC   | CHINA              |
| Gold (Au) | Jiangxi Copper Company Limited  | CHINA              |
| Gold (Au) | Johnson Matthey Inc.  | UNITED STATES      |
| Gold (Au) | Johnson Matthey Limited   | CANADA             |
| Gold (Au) | JSC Ekaterinburg Non-Ferrous Metal Processing Plant                   | RUSSIAN FEDERATION |
| Gold (Au) | JSC Uralelectromed  | RUSSIAN FEDERATION |
| Gold (Au) | JX Nippon Mining & Metals   | JAPAN              |
| Gold (Au) | Kazakhmys Smelting LLC  | KAZAKHSTAN         |
| Gold (Au) | Kazzinc Ltd   | KAZAKHSTAN         |
| Gold (Au) | Kennecot Utah Copper  | UNITED STATES      |
| Gold (Au) | Kojima Chemicals Co.,Ltd  | JAPAN              |
| Gold (Au) | Korea Metal Co., Ltd.   | KOREA, REPUBLIC OF |
| Gold (Au) | Kyrgyzaltyn JSC   | KYRGYZSTAN         |
| Gold (Au) | La Caridad  | MEXICO             |
| Gold (Au) | LAIZHOU SHANDONG  | CHINA              |
| Gold (Au) | L'azurde Company For Jewelry  | SAUDI ARABIA       |
| Gold (Au) | Lingbao Gold Company Limited  | CHINA              |
| Gold (Au) | Lingbao Jinyuan Tonghui Refinery Co., Ltd.                            | CHINA              |
| Gold (Au) | LS-NIKKO Copper Inc.  | KOREA ,REPUBLIC OF |
| Gold (Au) | Luoyang Zijin Yinhui Gold Smelting                                    | CHINA              |
| Gold (Au) | Luoyang Zijin Yinhui Metal Smelt Co Ltd                               | CHINA              |



Edgar Filing: ARROW ELECTRONICS INC - Form SD

|           |   |   |
|-----------|---|---|
| Gold (Au) | Materion  | UNITED STATES                             |
| Gold (Au) | Metalor Technologies (Hong Kong) Ltd.                     | CHINA                                     |
| Gold (Au) | Metalor Technologies SA                                   | SWITZERLAND                               |
| Gold (Au) | Metalor USA Refining Corporation                          | UNITED STATES                             |
| Gold (Au) | METALÚRGICA MET-MEX PEÑÓLES,<br>S.A. DE C.V               | MEXICO                                    |
| Gold (Au) | Met-Mex Peñoles, S.A.                                     | MEXICO                                    |
| Gold (Au) | Mitsubishi Materials Corporation                          | JAPAN                                     |
| Gold (Au) | Nadir Metal Rafineri San. Ve Tic. A. <sup>a</sup>         | TURKEY                                    |
| Gold (Au) | Navoi Mining and Metallurgical Combinat                   | UZBEKISTAN                                |
| Gold (Au) | Nihon Material Co., Ltd.                                  | JAPAN                                     |
| Gold (Au) | Niihama Nickel Refinery                                   | JAPAN                                     |
| Gold (Au) | Norddeutsche Affinererie AG                               | GERMANY                                   |
| Gold (Au) | Ohio Precious Metals, LLC                                 | UNITED STATES                             |
| Gold (Au) | Ohura Precious Metal Industry Co., Ltd.                   | JAPAN                                     |
| Gold (Au) | OJSC Krastvetmet  | RUSSIAN FEDERATION                        |
| Gold (Au) | PAMP SA   | SWITZERLAND                               |
| Gold (Au) | Pan Pacific Copper Co Ltd.                                | JAPAN                                     |
| Gold (Au) | Penglai Penggang Gold Industry Co., Ltd.                  | CHINA                                     |
| Gold (Au) | Perth Mint  | AUSTRALIA                                 |
| Gold (Au) | Prioksky Plant of Non-Ferrous Metals                      | RUSSIAN FEDERATION                        |
| Gold (Au) | PT Aneka Tambang (Persero) Tbk                            | INDONESIA                                 |
| Gold (Au) | PX Précinox SA  | SWITZERLAND                               |
| Gold (Au) | Rand Refinery (Pty) Ltd.                                  | SOUTH AFRICA                              |
| Gold (Au) | Refinery LS-Nikko Copper Inc.                             | KOREA                                     |
| Gold (Au) | Republic Metals Corporation                               | UNITED STATES                             |
| Gold (Au) | Royal Canadian Mint                                       | CANADA                                    |
| Gold (Au) | Sabin Metal Corp.   | UNITED STATES                             |
| Gold (Au) | Samdok Metal  | KOREA, REPUBLIC OF                        |
| Gold (Au) | Samduck Precious Metals                                   | KOREA, DEMOCRATIC PEOPLE'S<br>REPUBLIC OF |
| Gold (Au) | SAMWON Metals Corp.                                       | KOREA, REPUBLIC OF                        |
| Gold (Au) | Schöne Edelmetaal B.V.                                    | NETHERLANDS                               |
| Gold (Au) | SD (Samdok) Metal   | KOREA, REPUBLIC OF                        |
| Gold (Au) | SEMPSA Joyería Platería SA                                | SPAIN                                     |
| Gold (Au) | Shandong Tarzan Bio-Gold Industry Co.,<br>Ltd.            | CHINA                                     |
| Gold (Au) | Shandong Tiancheng Biological Gold<br>Industrial Co.,Ltd. | CHINA                                     |
| Gold (Au) | Shandong Zhaojin Gold & Silver Refinery<br>Co., Ltd.      | CHINA                                     |
| Gold (Au) | Shandong Zhaojin Gold & Silver Refinery<br>Co., Ltd.      | CHINA                                     |
| Gold (Au) | Shonan Plant Tanaka Kikinzoku                             | JAPAN                                     |
| Gold (Au) | Sichuan Tianze Precious Metals Co., Ltd.                  | CHINA                                     |
| Gold (Au) | SMM   | JAPAN                                     |
| Gold (Au) | So Accurate Group, Inc.                                   | UNITED STATES                             |
| Gold (Au) |   | RUSSIA                                    |



Edgar Filing: ARROW ELECTRONICS INC - Form SD

SOE Shyolkovsky Factory of Secondary  
Precious Metals

---

Edgar Filing: ARROW ELECTRONICS INC - Form SD

|               |  |               |
|---------------|--|---------------|
| Gold (Au)     | Solar Applied Materials Technology Corp.             | TAIWAN        |
| Gold (Au)     | Sumitomo Metal Mining Co., Ltd.                      | JAPAN         |
| Gold (Au)     | Tanaka Kikinzoku Kogyo K.K.                          | JAPAN         |
| Gold (Au)     | The Great Wall Gold and Silver Refinery of China     | CHINA         |
| Gold (Au)     | TongLing Nonferrous Metals Group Holdings Co., Ltd.  | CHINA         |
| Gold (Au)     | Toyo Smelter & Refinery                              | JAPAN         |
| Gold (Au)     | Umicore Brasil Ltda.                                 | BRAZIL        |
| Gold (Au)     | Umicore Precious Metals Thailand                     | THAILAND      |
| Gold (Au)     | Umicore SA Business Unit Precious Metals Refining    | BELGIUM       |
| Gold (Au)     | United Precious Metal Refining, Inc.                 | UNITED STATES |
| Gold (Au)     | Valcambi SA  | SWITZERLAND   |
| Gold (Au)     | Williams Advanced Materials                          | UNITED STATES |
| Gold (Au)     | Xstrata  | CANADA        |
| Gold (Au)     | Yamamoto Precious Metal Co., Ltd.                    | JAPAN         |
| Gold (Au)     | Yunnan Copper Industry Co., Ltd.                     | CHINA         |
| Gold (Au)     | Zhao Jin Mining Industry Co Ltd                      | CHINA         |
| Gold (Au)     | Zhao Yuan Gold Mine                                  | CHINA         |
| Gold (Au)     | Zhaojin Group & Gold Mineral China Co., Ltd.         | CHINA         |
| Gold (Au)     | Zhongyuan Gold Smelter of Zhongjin Gold Corporation  | CHINA         |
| Gold (Au)     | Zijin Kuang Ye Refinery                              | CHINA         |
| Gold (Au)     | Zijin Mining Group Co., Ltd. Gold Refinery           | CHINA         |
| Tantalum (Ta) | Changsha South Tantalum Niobium Co., Ltd.            | CHINA         |
| Tantalum (Ta) | Duoluoshan   | CHINA         |
| Tantalum (Ta) | F&X Electro-Materials Ltd.                           | CHINA         |
| Tantalum (Ta) | Global Advanced Metals Boyertown                     | UNITED STATES |
| Tantalum (Ta) | Guangdong Zhiyuan New Material Co., Ltd.             | CHINA         |
| Tantalum (Ta) | Guizhou Zhenhua Xinyun Technology Ltd., Kaili branch | CHINA         |
| Tantalum (Ta) | H.C. Starck Co., Ltd.                                | THAILAND      |
| Tantalum (Ta) | H.C. Starck Inc.                                     | UNITED STATES |
| Tantalum (Ta) | H.C. Starck Ltd.                                     | JAPAN         |
| Tantalum (Ta) | Hengyang King Xing Lifeng New Materials Co., Ltd.    | CHINA         |
| Tantalum (Ta) | Jiujiang Tanbre Co., Ltd.                            | CHINA         |
| Tantalum (Ta) | KEMET Blue Metals                                    | MEXICO        |
| Tantalum (Ta) | KEMET Blue Powder                                    | UNITED STATES |
| Tantalum (Ta) | King-Tan Tantalum Industry Ltd.                      | CHINA         |
| Tantalum (Ta) | LSM Brasil S.A.                                      | BRAZIL        |
| Tantalum (Ta) | Metallurgical Products India Pvt., Ltd.              | INDIA         |
| Tantalum (Ta) | Mitsui Mining & Smelting                             | JAPAN         |
| Tantalum (Ta) | Molycorp Silmet A.S.                                 | ESTONIA       |
| Tantalum (Ta) | Ningxia Orient Tantalum Industry Co., Ltd.           | CHINA         |

Tantalum (Ta)

Plansee SE Liezen

AUSTRIA

---

Edgar Filing: ARROW ELECTRONICS INC - Form SD

|               |   |                    |
|---------------|---|--------------------|
| Tantalum (Ta) | Plansee SE Reutte   | AUSTRIA            |
| Tantalum (Ta) | RFH   | CHINA              |
| Tantalum (Ta) | Solikamsk Magnesium Works OAO                                 | RUSSIAN FEDERATION |
| Tantalum (Ta) | Taki Chemical   | JAPAN              |
| Tantalum (Ta) | Ulba Metallurgical Plant JSC                                  | KAZAKHSTAN         |
| Tantalum (Ta) | Yichun Jin Yang Rare Metal Co., Ltd.                          | CHINA              |
| Tantalum (Ta) | Zhuzhou Cemented Carbide                                      | CHINA              |
| Tin (Sn)      | Alpha   | UNITED STATES      |
| Tin (Sn)      | Amalgamated Metals Corporation                                | PERU               |
| Tin (Sn)      | Chengfeng Metals Co Pte Ltd                                   | SINGAPORE          |
| Tin (Sn)      | China Rare Metal Material Co., Ltd.                           | CHINA              |
| Tin (Sn)      | China Tin Group Co., Ltd.                                     | CHINA              |
| Tin (Sn)      | CNMC (Guangxi) PGMA Co., Ltd.                                 | CHINA              |
| Tin (Sn)      | Cooper Santa  | BRAZIL             |
| Tin (Sn)      | CV Gita Pesona  | INDONESIA          |
| Tin (Sn)      | CV Serumpun Sebalai   | INDONESIA          |
| Tin (Sn)      | CV United Smelting  | INDONESIA          |
| Tin (Sn)      | Dowa Metaltech Co., Ltd.                                      | JAPAN              |
| Tin (Sn)      | EM Vinto  | BOLIVIA            |
| Tin (Sn)      | Empresa Metalúrgica Vinto                                     | BOLIVIA            |
| Tin (Sn)      | ENAF  | BOLIVIA            |
| Tin (Sn)      | Estanho de Rondônia S.A.                                      | BRAZIL             |
| Tin (Sn)      | Feinhütte Halsbrücke GmbH                                     | GERMANY            |
| Tin (Sn)      | Fenix Metals  | POLAND             |
| Tin (Sn)      | Funsur Smelter  | PERU               |
| Tin (Sn)      | Geiju City Datun Chengfeng Smelter                            | CHINA              |
| Tin (Sn)      | Gejiu Non-Ferrous Metal Processing Co., Ltd.                  | CHINA              |
| Tin (Sn)      | Guang Xi Liu Xhou   | CHINA              |
| Tin (Sn)      | Huichang Jinshunda Tin Co., Ltd.                              | CHINA              |
| Tin (Sn)      | Huichang Shun Tin Kam Industries, Ltd.                        | CHINA              |
| Tin (Sn)      | Indonesian State Tin Corporation Mentok Smelter               | INDONESIA          |
| Tin (Sn)      | Indonesian State Tin Corporation Mentok Smelter               | INDONESIA          |
| Tin (Sn)      | Indra Eramulti Logam  | CHINA              |
| Tin (Sn)      | Jiangxi Nanshan   | CHINA              |
| Tin (Sn)      | Jiangxi Shunda Huichang Kam Tin Co., Ltd.                     | CHINA              |
| Tin (Sn)      | Kai Union Industry and Trade Co., Ltd. (China)                | CHINA              |
| Tin (Sn)      | Kundur Smelter  | INDONESIA          |
| Tin (Sn)      | Linwu Xianggui Smelter Co                                     | CHINA              |
| Tin (Sn)      | Magnu's Minerais Metais e Ligas Ltda.                         | BRAZIL             |
| Tin (Sn)      | Malaysia Smelting Corporation (MSC)                           | MALAYSIA           |
| Tin (Sn)      | Melt Metais e Ligas S/A                                       | BRAZIL             |
| Tin (Sn)      | Mentok Smelter  | INDONESIA          |
| Tin (Sn)      | Metallic Materials Branch of Guangxi China Tin Group Co.,Ltd. | CHINA              |

Edgar Filing: ARROW ELECTRONICS INC - Form SD

Tin (Sn)

Metallo-Chimique N.V.

BELGIUM

Tin (Sn)

Mineração Taboca S.A.

BRAZIL

---

Edgar Filing: ARROW ELECTRONICS INC - Form SD

|              |  |           |
|--------------|--|-----------|
| Tin (Sn)     | Minsur                                       | PERU      |
| Tin (Sn)     | Mitsubishi Materials Corporation             | JAPAN     |
| Tin (Sn)     | MSC  | MALAYSIA  |
| Tin (Sn)     | Novosibirsk Integrated Tin Works             | RUSSIA    |
| Tin (Sn)     | O.M. Manufacturing Philippines, Inc.         | JAPAN     |
| Tin (Sn)     | OMSA   | BOLIVIA   |
| Tin (Sn)     | Operaciones Metalurgical S.A.                | BOLIVIA   |
| Tin (Sn)     | PT Bangka Kudai Tin                          | INDONESIA |
| Tin (Sn)     | PT Bangka Putra Karya                        | INDONESIA |
| Tin (Sn)     | PT Bangka Timah Utama Sejahtera              | INDONESIA |
| Tin (Sn)     | PT Bangka Tin Industry                       | INDONESIA |
| Tin (Sn)     | PT Belitung Industri Sejahtera               | INDONESIA |
| Tin (Sn)     | PT BilliTin Makmur Lestari                   | INDONESIA |
| Tin (Sn)     | PT Bukit Timah                               | INDONESIA |
| Tin (Sn)     | PT DS Jaya Abadi                             | INDONESIA |
| Tin (Sn)     | PT Eunindo Usaha Mandiri                     | INDONESIA |
| Tin (Sn)     | PT Indora Ermulti                            | INDONESIA |
| Tin (Sn)     | PT Indra Eramulti Logam Industry             | INDONESIA |
| Tin (Sn)     | PT Panca Mega Persada                        | INDONESIA |
| Tin (Sn)     | PT Pelat Timah Nusantara Tbk                 | INDONESIA |
| Tin (Sn)     | PT Prima Timah Utama                         | INDONESIA |
| Tin (Sn)     | PT Refined Bangka Tin                        | INDONESIA |
| Tin (Sn)     | PT Seirama Tin Investment                    | INDONESIA |
| Tin (Sn)     | PT Stanindo Inti Perkasa                     | INDONESIA |
| Tin (Sn)     | PT Supra Sukses Trinusa                      | INDONESIA |
| Tin (Sn)     | PT Tambang Timah                             | INDONESIA |
| Tin (Sn)     | PT Timah                                     | INDONESIA |
| Tin (Sn)     | PT Tinindo Inter Nusa                        | INDONESIA |
| Tin (Sn)     | Rui Da Hung                                  | TAIWAN    |
| Tin (Sn)     | Smelting Branch of Yunnan Tin Company Ltd    | CHINA     |
| Tin (Sn)     | T Stanindo Inti Perkasa                      | INDONESIA |
| Tin (Sn)     | Thai Solder Industry Corp., Ltd.             | THAILAND  |
| Tin (Sn)     | Thaisarco                                    | THAILAND  |
| Tin (Sn)     | The Gejiu cloud new colored electrolytic     | CHINA     |
| Tin (Sn)     | Unit Timah Kundur PT Tambang                 | INDONESIA |
| Tin (Sn)     | VQB Mineral and Trading Group JSC            | VIETNAM   |
| Tin (Sn)     | XiHai - Liuzhou China Tin Group Co ltd       | CHINA     |
| Tin (Sn)     | YTCL   | CHINA     |
| Tin (Sn)     | Yunnan Tin Group (Holding) Company Limited   | CHINA     |
| Tungsten (W) | A.L.M.T. Corp.                               | JAPAN     |
| Tungsten (W) | Chaozhou Xianglu Tungsten Industry Co., Ltd. | CHINA     |
| Tungsten (W) | Chenzhou Diamond Tungsten Products Co., Ltd. | CHINA     |
| Tungsten (W) | Fujian Jinxin Tungsten Co., Ltd.             | CHINA     |
| Tungsten (W) | Ganxian Shirui New Material Co., Ltd.        | CHINA     |

Tungsten (W)

Ganzhou Huaxing Tungsten Products Co., CHINA  
Ltd.

---

|              |   |                    |
|--------------|---|--------------------|
| Tungsten (W) | Ganzhou Jiangwu Ferrotungsten Co., Ltd.                       | CHINA              |
| Tungsten (W) | Ganzhou Non-ferrous Metals Smelting Co., Ltd.                 | CHINA              |
| Tungsten (W) | Ganzhou Seadragon W & Mo Co., Ltd.                            | CHINA              |
| Tungsten (W) | Global Tungsten & Powders Corp.                               | UNITED STATES      |
| Tungsten (W) | GTP   | UNITED STATES      |
| Tungsten (W) | Guangdong Xianglu Tungsten Co., Ltd.                          | CHINA              |
| Tungsten (W) | H.C. Starck GmbH  | GERMANY            |
| Tungsten (W) | Hunan Chunchang Nonferrous Metals Co., Ltd.                   | CHINA              |
| Tungsten (W) | Japan New Metals Co., Ltd                                     | JAPAN              |
| Tungsten (W) | Jiangxi Gan Bei Tungsten Co., Ltd.                            | CHINA              |
| Tungsten (W) | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.         | CHINA              |
| Tungsten (W) | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | CHINA              |
| Tungsten (W) | Jiangxi Tungsten Co Ltd                                       | CHINA              |
| Tungsten (W) | Jiangxi Xincheng Tungsten Industry Co., Ltd.                  | CHINA              |
| Tungsten (W) | Jiangxi Yaosheng Tungsten Co., Ltd.                           | CHINA              |
| Tungsten (W) | Malipo Haiyu Tungsten Co., Ltd.                               | CHINA              |
| Tungsten (W) | Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC     | VIETNAM            |
| Tungsten (W) | Pobedit JSC   | RUSSIAN FEDERATION |
| Tungsten (W) | Tejing (Vietnam) Tungsten Co., Ltd.                           | VIETNAM            |
| Tungsten (W) | Vietnam Youngsun Tungsten Industry Co., Ltd                   | VIETNAM            |
| Tungsten (W) | WBH   | AUSTRIA            |
| Tungsten (W) | Xiamen Tungsten (H.C.) Co., Ltd.                              | CHINA              |
| Tungsten (W) | Xiamen Tungsten Co., Ltd.                                     | CHINA              |

#### Product Conflict Minerals Status

After exercising due diligence, the Company determined that 57% of the products it manufactures are Conflict Free. It was unable to determine whether the Conflict Minerals contained in the remaining 43% of the products it assembled and modified were from recycled or scrap sources or whether such Conflict Minerals directly or indirectly financed or benefited armed groups in the Covered Countries. Therefore, pursuant to Section 1.01(c)(iv), the Company is not required to obtain an independent private sector audit for the 2014 reporting period.

To mitigate the risk that the Conflict Minerals benefit armed groups in the Covered Countries, Arrow has reiterated its Conflict Mineral Policy to its suppliers. To improve the Company's ability to conduct due diligence, Arrow continues to request completed EICC templates from its suppliers and emphasize its support of the Conflict Minerals Rule.

Arrow's Conflict Minerals Policy can be found at:

[http://www.arrow.com/about\\_arrow/arrow\\_conflict\\_minerals\\_policy.pdf](http://www.arrow.com/about_arrow/arrow_conflict_minerals_policy.pdf)



Conflict Minerals Disclosure/Report

The Company has prepared a Conflict Minerals Report which is attached to this Form SD as an exhibit and it has disclosed the information above on its website, [www.arrow.com](http://www.arrow.com).

Item 1.02 Exhibit

Refer to Exhibit 1.01 - Conflict Minerals Report for the reporting period January 1, 2014 to December 31, 2014.

Section 2 - Exhibits

Item 2.01 Exhibits

Exhibit 1.01 - Conflict Minerals Report for the reporting period January 1, 2014 to December 31, 2014, as required by Items 1.01 and 1.02 of this Form.

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.

ARROW ELECTRONICS, INC.  
(Registrant)

By: /s/ Gregory Tarpinian  
Gregory Tarpinian  
Senior V.P., General Counsel, and Secretary  
June 1, 2015