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

FORM SD

SPECIALIZED DISCLOSURE REPORT

SYNOPSYS, INC.

(Exact name of Registrant as specified in charter)

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.)

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, 2021.
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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/company/corporate-social-responsibility/supply-chain.html>.

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

Item 3.01 Exhibits

<u>Exhibit Number</u>	<u>Exhibit Title</u>
1.01	Conflict Minerals Report as required by Items 1.01 and 1.02 of this Form SD.

SIGNATURES

Synopsys, Inc.
Conflict Minerals Report
For The Year Ended December 31, 2021

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, 2021 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 originated in the Democratic Republic of the Congo or an adjoining country (the Covered Countries) and financed or benefited armed groups in any of these countries. Our due diligence measures are described in this Conflict Minerals Report.

As a result of an order issued by the SEC on May 2, 2014, registrants are not required to identify products as “DRC conflict free,” having “not been found to be ‘DRC conflict free,’” or “DRC conflict undeterminable,” and Synopsys makes no such identification of its products in this report. Synopsys has not obtained an independent private sector audit of its Conflict Minerals Report because, under guidance provided by the SEC’s Division of Corporation Finance on April 29, 2014, an audit is not required unless a registrant voluntarily describes its products as “DRC conflict free.”

1. Company Overview

Synopsys, Inc. provides products and services used across the entire silicon to software spectrum, from engineers creating advanced semiconductors to product teams developing advanced electronic systems to software developers seeking to ensure the security and quality of their code.

We are a global leader in supplying the electronic design automation software that engineers use to design and test integrated circuits, also known as chips. We also offer semiconductor intellectual property (IP) products, which are pre-designed circuits that engineers use as components of larger chip designs rather than designing those circuits themselves. We provide software and hardware used to validate the electronic systems that incorporate chips and the software that runs on them. To complement these offerings, we provide technical services and support to help our customers develop advanced chips and electronic systems. We are also a leading provider of software tools and services that improve the security, quality and compliance of software in a wide variety of industries, including electronics, financial services, automotive, medicine, energy and industrials.

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. A number of our suppliers 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 *The Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas – Clarification and the related Implementation of and Implementation of Tantalum and Tin*.

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 <https://www.synopsys.com/company/corporate-social-responsibility/supply-chain.html>.

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 legal and corporate affairs, finance, operations, and internal audit functions and our hardware product teams, and is sponsored by our General Counsel.

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, we engaged a third-party vendor to conduct outreach with our suppliers and manage the supplier survey process. The vendor 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 vendor 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 <https://secure.ethicspoint.com/omain/me ia/en/ ui/21287/in e .html>.

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

The complexity of our products and supply chain makes it difficult for us to map our 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. The CMRT can be viewed in several languages and includes extensive written instructions.

Reviewing Supplier Information

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.synopsys.com/company/global-citizenship/supply-chain.html>.

4. Due Diligence Results

Smelters and Refiners

We received CMRT responses from approximately 92% 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 231 gold refiners, 46 tantalum smelters, 163 tin smelters, and 64 tungsten smelters. We compared these identified smelters and refiners against the RMI's Conformant Smelter and Refiner Lists. As of May 10, 2022, approximately 42% of gold refiners, 76% of tantalum smelters, 34% of tin smelters, and 61% 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

The attached [Appendix](#) lists the country locations of the smelter and refiner facilities identified by our suppliers, as indicated on the Smelter Reference List. 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

- 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.

Appendix

Country Locations of Smelter and Refiner Facilities Identified by Suppliers (per the Smelter Reference List)

<u>Conflict Mineral</u>	<u>Gold</u>	<u>Tantalum</u>	<u>Tin</u>	<u>Tungsten</u>
Country	ANDORRA	AUSTRIA	BELGIUM	AUSTRIA
Locations of Smelter and Refiner Facilities	AUSTRALIA	BRAZIL	BOLIVIA	BRAZIL
	AUSTRIA	CHINA	BRAZIL	CHINA

TAIWAN
THAILAND
TURKEY
UGANDA
UNITED ARAB
EMIRATES
UNITED STATES OF
AMERICA
UZBEKISTAN
ZAMBIA
ZIMBABWE