

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

**FORM SD
Specialized Disclosure Report**

EASTMAN KODAK COMPANY

(Exact name of registrant as specified in its charter)

NEW JERSEY
(State or other jurisdiction of
incorporation or organization)

1-87
(Commission File Number)

16-0417150
(IRS Employer Identification No.)

**343 STATE STREET,
ROCHESTER, NEW YORK 14650**
(Address of principal executive offices) (Zip Code)

Douglas Strong, 585-724-2131
(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:

X Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1, 2017 to December 31, 2017.

Section 1 – Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

Conflict Minerals Disclosure:

The Conflict Minerals Report for the period from January 1, 2017 to December 31, 2017 is filed herewith as Exhibit 1.01 and is publicly available through Kodak’s investor center under the “Financial Information/SEC Filings” tabs on its website at www.kodak.com.

Item 1.02 Exhibit

The Conflict Minerals Report for the period from January 1, 2017 to December 31, 2017 is filed herewith as Exhibit 1.01.

Section 2 – Exhibits

Item 2.01 Exhibits

Exhibit 1.01 Conflict Minerals Report 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.

EASTMAN KODAK COMPANY

Date: May 31, 2018

By: /s/ Sharon E. Underberg
Sharon E. Underberg
General Counsel, Secretary and Senior Vice President

Eastman Kodak Company Conflict Minerals Report

I Introduction

This is the Conflict Minerals Report of Eastman Kodak Company (“Kodak”) for the reporting period from January 1, 2017 to December 31, 2017, provided in accordance with Rule 13p-1 (“Rule 13p-1”) under the Securities Exchange Act of 1934 (the “1934 Act”). Please refer to Rule 13p-1, Form SD and the 1934 Act Release No. 34-67716 for definitions of the terms used in this report, unless otherwise defined herein.

Rule 13p-1 imposes certain reporting obligations on United States Securities and Exchange Commission (“SEC”) registrants that manufacture or contract to manufacture products containing conflict minerals that are necessary to the functionality or production of their products. Conflict minerals are defined by the SEC as cassiterite, columbite-tantalite, gold, wolframite, or their derivatives, which are limited to tin, tantalum and tungsten (collectively, “3TG”).

Kodak has determined that conflict minerals as defined by the SEC were necessary to the functionality or production of certain products that Kodak manufactured or contracted to be manufactured during 2017. Kodak conducted a good faith reasonable country of origin inquiry (“RCOI”) to determine the origin of the conflict minerals used in its products. In accordance with the Rule, Kodak undertook due diligence on the source and chain of custody of its Conflict Minerals.

Company Overview

Kodak is a global commercial printing and imaging company with proprietary technologies in materials science, digital imaging science and software, and deposition processes (methods whereby one or more layers of various materials in gaseous, liquid or small particle form are deposited on a substrate in precise quantities and positions). Kodak leverages its core technology products and services to develop solutions for the product goods packaging and graphic communications markets, and is developing products for the functional printing market. Kodak also offers brand licensing and intellectual property opportunities, provides products and services for motion pictures and other commercial films, and sells ink to its existing installed consumer inkjet printer base.

Supply Chain Overview

Kodak’s global supply chain is complex given that it has over 2,500 material suppliers and the fact that most of its suppliers are located far downstream from the mineral smelters and associated mines. Kodak relies on its suppliers to assist in the reasonable country of origin inquiry and due diligence efforts for the conflict minerals contained in the materials supplied to, or manufactured for Kodak. Kodak focuses on collecting data from direct suppliers who are likely to supply Kodak with conflict minerals and requires suppliers to establish the necessary proactive due diligence programs that will enable greater long-term supply chain transparency through contract terms.

Kodak performed an analysis of its product components and determined that conflict minerals, which are regularly used in electronics and electrical equipment, are contained in certain components used in the products manufactured for or by Kodak. Kodak determined that conflict minerals that are contained in certain products were necessary to the functionality or production of the product manufactured or contracted to be manufactured for Kodak, while consumables such as inks, digital and flexographic print plates and chemicals do not contain these minerals.

II Design of Due Diligence Measures

Kodak designed its overall conflict minerals policies and procedures to conform, in all material respects, to the five-step framework developed by the Organisation for Economic Co-operation and Development (“OECD”), *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas*, and the supplements on tin, tantalum, tungsten and gold.

Kodak’s implementation of the five-step framework consists of the following activities which are discussed in further detail below.

1. Established a management system
2. Established a process to identify and assess risks in Kodak’s supply chain
3. Respond to identified risks
4. Auditing of smelters/refiners sourcing
5. Reporting on supply chain due diligence

Kodak, as a purchaser of component parts, is many steps removed from the mining of conflict minerals; Kodak does not purchase raw ore or unrefined conflict minerals, and conducts no purchasing activities directly in the Covered Countries. Because Kodak does not typically have direct relationships with smelters and refiners, Kodak’s efforts utilized multi-industry initiatives with the smelters and refiners of minerals that may provide those minerals to companies in Kodak’s supply chain.

Step 1: Management Systems

The management system includes a multidisciplinary Conflict Minerals Team consisting of representation from Kodak’s Health, Safety & Environment organization, Worldwide Procurement and Corporate Finance. This team is responsible for the design, implementation and continued administration of Kodak’s conflict minerals program. Senior management (including the Director and VP for Purchasing, the Assistant Controller and the General Counsel) is briefed about the results of the team’s due diligence efforts. It is Kodak’s policy to refrain from purchasing, directly or indirectly from any sources, conflict minerals that may finance or benefit armed groups. Kodak’s conflict minerals policy is publicly available on Kodak’s website at www.kodak.com/go/hsesupplier.

Kodak requires its suppliers to implement a conflict minerals due diligence management system, including a system of controls, to determine the sources of conflict minerals in all products that are supplied to, or manufactured on behalf of, Kodak. Kodak’s suppliers are required to exercise due diligence on the source and chain of custody of these minerals and to cooperate in providing Kodak its due diligence information to work toward sourcing only from smelters and refiners which have been certified as conflict free.

Kodak was a member of Electronic Industry Citizenship Coalition (“EICC”) and the Conflict Free Sourcing Initiative (“CFSI”) in 2016. Although no longer a member, Kodak continues to follow the industry guidance through Responsible Minerals Initiative (“RMI”) formerly Conflict-Free Sourcing Initiative (“CFSI”). The Responsible Minerals Initiative contributes to a range of tools and resources including the Responsible Minerals Assurance Process, the Conflict Minerals Reporting Template, Reasonable Country of Origin Inquiry data and a range of guidance documents on responsible minerals sourcing. The Responsible Minerals Initiative also runs regular workshops on minerals supply chain issues and contributes to policy development and debates with leading civil society organizations and governments. Through these affiliations, Kodak collaborates with industry peers to support the development and use of tools, programs and mineral traceability schemes that help enable companies to source DRC conflict-free minerals. One of the programs developed by the RMI is the Responsible Minerals Assurance Process (RMAP). The RMAP is a voluntary initiative in which independent third-party audits are conducted of a smelter’s or refiner’s procurement processes to determine if the smelter or refiner can demonstrate that all the minerals they process originate from conflict-free sources. Kodak also utilizes the Conflict Minerals Reporting Template (“CMRT”) developed by RMI to collect supplier data. Kodak’s support of these programs demonstrates its commitment to conflict free sources for the metals used in Kodak’s products. Kodak also has a Business Conduct phone number and website for employees to report concerns about violations of Kodak’s Conflict Minerals policy and other policies. <https://www.kodak.com/corp/company/sustainability/conduct-guide/default.htm>

Step 2: Identify and Assess Risks in Our Supply Chain and Reasonable Country of Origin Inquiry:

Kodak, through its RCOI process, determined suppliers that were in scope by starting with a complete list of first tier suppliers and removing: service providers, indirect materials suppliers, and suppliers with whom Kodak spent no money in 2017. In some instances, second tier suppliers (e.g., distributors) were also included in the scope of this initial list. Based on a review of Kodak's spending data and known product compositions, suppliers providing services or products that contain no conflict minerals were excluded from Kodak's scope. The exclusions included suppliers providing commodities such as travel, employee benefits, facility maintenance, stationery, office supplies and chemicals with a known composition. The remaining suppliers were identified as relevant or high priority suppliers, including suppliers with the potential to provide raw materials, components, parts, sub-assemblies and products that have the greatest likelihood of containing conflict minerals.

The suppliers that were identified as relevant or high priority received an email containing a cover letter signed by Kodak's Chief Procurement Officer and a conflict minerals questionnaire using the CMRT. The cover letter provided an explanation for the request including the regulatory background and the expected timing for a response. Non-responsive suppliers were contacted a minimum of three times. These communications were monitored and tracked for future reporting and transparency.

Kodak received responses from the suppliers that were in scope. Kodak's minerals team reviewed and verified each completed questionnaire against expectations established by company policy. Kodak also engaged with Assent Compliance to review the supplier's responses to determine if it had a conflict minerals policy describing its due-diligence program and how it was being applied to the suppliers in the chain. Further, any smelters and refiners identified in the questionnaire were compared against CFSI's standard smelter reference list and the U.S. Department of Commerce list of known smelters and refiners to verify that the identified facilities are smelters or refiners of conflict minerals. Kodak also reviewed country of origin information available from CFSI for the smelters and refiners identified in the questionnaire.

III. Due Diligence Measures Performed**Step 3: Strategy to Respond to Identified Risks:**

Kodak compared smelters and refiners identified by suppliers in the questionnaire against the list of facilities that have received a "conflict free" designation from CFSI. In addition, Kodak reviewed the responses against criteria developed to determine which responses required follow-up and further engagement. These criteria included categories for untimely or incomplete responses as well as inconsistencies within the data reported in the template. Kodak worked directly with these suppliers to provide revised responses. Specifically, Kodak followed up with suppliers who provided any of the following negative or incomplete responses to the questionnaire:

- The response did not appear justified by the product category or composition of the product.
- The supplier did not indicate that it had implemented a management system or due diligence program to obtain information from its suppliers.
- The response was incomplete or necessary information was not provided by the supplier.
- The smelter list included problematic smelters (smelters that are not on either CFSI's standard smelter list or the U.S. Department of Commerce list of known smelters).

If a supplier's efforts to address concerns were determined to be deficient, it was flagged for further action, ranging from education to discontinuing purchases. The project team reports annually on its progress to relevant senior executives of the company.

Step 4: Auditing of Smelters/Refiners Sourcing

Due to the complexity of Kodak's products, and the depth, breadth and constant evolution of its supply chain, it is difficult to identify actors upstream from Kodak's direct suppliers. Kodak does not typically have a direct relationship with 3TG smelters and refiners and does not perform or direct audits of these entities within its supply chain. Kodak has supported the execution of the RMAP and has relied on the RMAP to perform audits of smelters and to develop information on the country and mine or location of origin of conflict minerals in Kodak's products. In order to assess the risk that any of these smelters posed to Kodak's supply chain, Assent determined if the smelter had been audited against a standard in conformance with the OECD Guidance, such as the RMAP. Smelters that have completed an RMAP audit are considered to be DRC-Conflict Free.

IV. Reporting and Results

Step 5: Annual Reports on Supply Chain Due Diligence:

Kodak annually reports on its conflict minerals supply chain due diligence to the SEC through its Form SD and Conflict Minerals Report, and publishes the same information on its public website.

Results of Supply Chain Due Diligence

Reviewing information about 3TG smelters and refiners in Kodak's supply chain represents the most reasonable effort Kodak can make to determine the mines or locations of origin of the 3TG in its supply chain. Kodak received responses from approximately 85% of the suppliers surveyed. Based on these responses, Kodak identified 314 smelters or refiners of 3TG that are known smelters or refiners based on the RMI's standard smelter reference list and may have processed the conflict minerals contained in Kodak's products. These smelters are listed in the Appendix. The Appendix also includes an aggregated list of the countries of origin from which the listed smelters and refiners are believed to have sourced conflict minerals, in addition to recycled and scrap sources.

A majority of Kodak's suppliers provided information at the company level, rather than information specific to the materials purchased by Kodak. Kodak is unable to validate whether the smelters and refiners listed in the Appendix in fact contributed conflict minerals to its products.

Of the 314 smelters and refiners listed in the Appendix, 255 have been certified as compliant with the RMI's RMAP, and an additional 8 are active in the RMAP third-party audit process. Kodak was unable to determine the conflict status of the remaining smelters and refiners.

Smelters and refiners that are compliant with the relevant RMAP assessment protocols or currently in the audit process:

| | |
|-----------|------------------|
| Tantalum: | 41 of 42 (98%) |
| Tin: | 72 of 80 (90%) |
| Tungsten: | 43 of 46 (93%) |
| Gold: | 107 of 146 (73%) |

Overall, 263 of 314, or 84% of the smelters and refiners are compliant with the RMI's RMAP or are currently in the audit process.

The number of smelters and refiners in Kodak's supply chain as of December 31, 2017 that were compliant with the RMAP's CFSP has more than quadrupled since Kodak began the evaluation process in 2013.

RMAP Compliant smelters and refiners in Kodak's supply chain:

| | |
|------|-------------------------------------|
| 2013 | 55 Compliant smelters and refiners |
| 2014 | 126 Compliant smelters and refiners |
| 2015 | 214 Compliant Smelters and refiners |
| 2016 | 244 Compliant Smelters and refiners |
| 2017 | 255 Compliant Smelters and refiners |

V. Product Description:

Given the fact that not all smelters and refiners identified by Kodak’s suppliers have been audited by the RMI’s RMAP list and many suppliers are still collecting information from their supply chain, Kodak’s products containing or using conflict minerals are considered DRC conflict undeterminable.

The Kodak products determined to be DRC conflict undeterminable are as follows:

| | |
|--|---|
| KODAK PROSPER Press Platform | KODAK VERSAMARK Printing Systems |
| KODAK PROSPER Imprinting Systems | KODAK VERSAMARK Imprinting Systems |
| KODAK NEXPRESS Digital Production Color Press Platform | KODAK DIGIMASTER HD Digital Production Platform |
| KODAK FLEXCEL NX Imager and Laminator | Kodak FLEXCEL Direct Imager |
| Print on Demand Solutions | |

| | |
|----------------------------------|-----------------------------------|
| MAGNUS Platesetters | TRENDESETTER Platesetters |
| ACHIEVE Platesetters | GENERATION NEWS Platesetter |
| TRENDESETTER NEWS Platesetter | MERCURY P-HD Plate Processor |
| S Plate Processor | P-LD Plate Processor |
| T-HDX and T-HDE Plate Processors | Entertainment Motion Picture Film |

VI Steps to Improve Due Diligence

Kodak will continue to communicate its expectations and information requirements to its direct suppliers. Kodak will also continue to monitor changes in circumstances that may impact the facts or its determination. Over time, Kodak anticipates that the amount of information globally on the traceability and sourcing of these ores will increase and improve Kodak’s knowledge. However, if Kodak identifies an upstream supplier is sourcing from or linked to any party providing direct or indirect support to non-state armed groups, Kodak will work with its supply chain to suspend or discontinue engagement with that upstream supplier. Kodak expects its suppliers to take similar measures with their suppliers to ensure alignment throughout the supply chain.

In 2017, Kodak has partnered with Assent, a SaaS company, to assist in a data management solution to track regulatory compliance across Kodak’s supply chain. A solution such as this is needed to further strengthen Kodak’s due diligence process to ensure legal compliance across the product portfolio and to meet customer expectations. In addition to those above, Kodak will take the following steps during the next compliance period to improve the due diligence conducted to further mitigate the risk that its necessary conflict minerals do not benefit armed groups, including:

- Continue to collect responses from suppliers using the CMRT through Assent Compliance. The service will collect and store CMRTs and supplier data, communicate with our supply chain and provide training and education where necessary. This streamlined approach will roll up our data and validate submitted information if they are complete and valid based on logic tests.
- Compare and validate RCOI results to information collected via independent conflict free smelter validation programs.
- Inform and encourage suppliers to transition to smelters identified by the due diligence process as “conflict free” by an independent audit program.

APPENDIX

The table below lists the smelters and refiners as reported to Kodak by its suppliers that are known smelters or refiners based on the RMI's standard smelter reference list as of April 2018 and may have processed the conflict minerals contained in Kodak's products. This information is as reported by the RMI as of May 1, 2018.

| Metal | Smelter Name | Smelter Facility Location |
|-------|--|---------------------------|
| Gold | Abington Reldan Metals, LLC* | UNITED STATES |
| Gold | Advanced Chemical Company* | UNITED STATES |
| Gold | Aida Chemical Industries Co., Ltd.* | JAPAN |
| Gold | Al Etihad Gold LLC* | UNITED ARAB EMIRATES |
| Gold | Allgemeine Gold-und Silberscheideanstalt A.G.* | GERMANY |
| Gold | Almalyk Mining and Metallurgical Complex (AMMC)* | UZBEKISTAN |
| Gold | AngloGold Ashanti Córrego do Sítio Mineração* | BRAZIL |
| Gold | Argor-Heraeus S.A.* | SWITZERLAND |
| Gold | Asahi Pretec Corp.* | JAPAN |
| Gold | Asahi Refining Canada Ltd.* | CANADA |
| Gold | Asahi Refining USA Inc.* | UNITED STATES |
| Gold | Asaka Riken Co., Ltd.* | JAPAN |
| Gold | Atasay Kuyumculuk Sanayi Ve Ticaret A.S. | TURKEY |
| Gold | AU Traders and Refiners* | SOUTH AFRICA |
| Gold | Aurubis AG* | GERMANY |
| Gold | Bangalore Refinery | INDIA |
| Gold | Bangko Sentral ng Pilipinas (Central Bank of the Philippines)* | PHILIPPINES |
| Gold | Boliden AB* | SWEDEN |
| Gold | C. Hafner GmbH + Co. KG* | GERMANY |
| Gold | Caridad | MEXICO |
| Gold | CCR Refinery - Glencore Canada Corporation* | CANADA |
| Gold | Cendres + Métaux S.A.* | SWITZERLAND |
| Gold | Chimet S.p.A.* | ITALY |
| Gold | Chugai Mining | JAPAN |
| Gold | Daejin Indus Co., Ltd.* | KOREA, REPUBLIC OF |
| Gold | Daye Non-Ferrous Metals Mining Ltd. | CHINA |
| Gold | Degussa Sonne / Mond Goldhandel GmbH | GERMANY |
| Gold | DODUCO Contacts and Refining GmbH* | GERMANY |
| Gold | Dowa* | JAPAN |
| Gold | DSC (Do Sung Corporation)* | KOREA, REPUBLIC OF |
| Gold | Eco-System Recycling Co., Ltd.* | JAPAN |
| Gold | Elemental Refining, LLC | UNITED STATES |
| Gold | Emirates Gold DMCC* | UNITED ARAB EMIRATES |

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|------|--|----------------------|
| Gold | Fidelity Printers and Refiners Ltd. | ZIMBABWE |
| Gold | GCC Gujrat Gold Centre Pvt. Ltd. | INDIA |
| Gold | Geib Refining Corporation* | UNITED STATES |
| Gold | Gold Refinery of Zijin Mining Group Co., Ltd.* | CHINA |
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM | CHINA |
| Gold | Guangdong Jinding Gold Limited | CHINA |
| Gold | Guoda Safina High-Tech Environmental Refinery Co., Ltd. | CHINA |
| Gold | Hangzhou Fuchunjiang Smelting Co., Ltd. | CHINA |
| Gold | HeeSung* | KOREA, REPUBLIC OF |
| Gold | Heimerle + Meule GmbH* | GERMANY |
| Gold | Heraeus Metals Hong Kong Ltd.* | CHINA |
| Gold | Heraeus Precious Metals GmbH & Co. KG* | GERMANY |
| Gold | Hunan Chenzhou Mining Co., Ltd. | CHINA |
| Gold | Hwasung CJ Co., Ltd. | KOREA, REPUBLIC OF |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.* | CHINA |
| Gold | Ishifuku Metal Industry Co., Ltd.* | JAPAN |
| Gold | Istanbul Gold Refinery* | TURKEY |
| Gold | Italpreziosi* | ITALY |
| Gold | Japan Mint* | JAPAN |
| Gold | Jiangxi Copper Co., Ltd.* | CHINA |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant* | RUSSIAN FEDERATION |
| Gold | JSC Uralelectromed* | RUSSIAN FEDERATION |
| Gold | JX Nippon Mining & Metals Co., Ltd.* | JAPAN |
| Gold | Kaloti Precious Metals | UNITED ARAB EMIRATES |
| Gold | Kazakhmys Smelting LLC | KAZAKHSTAN |
| Gold | Kazzinc* | KAZAKHSTAN |
| Gold | Kennecott Utah Copper LLC* | UNITED STATES |
| Gold | KGHM Polska Miedz Spolka Akcyjna | POLAND |
| Gold | Kojima Chemicals Co., Ltd.* | JAPAN |
| Gold | Korea Zinc Co., Ltd.* | KOREA, REPUBLIC OF |
| Gold | Kyrgyzaltyn JSC* | KYRGYZSTAN |
| Gold | Kyshtym Copper-Electrolytic Plant ZAO | RUSSIAN FEDERATION |
| Gold | L'azurde Company For Jewelry | SAUDI ARABIA |
| Gold | Lingbao Gold Co., Ltd. | CHINA |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd. | CHINA |
| Gold | L'Orfebre S.A. | ANDORRA |
| Gold | LS-NIKKO Copper Inc.* | KOREA, REPUBLIC OF |
| Gold | Luoyang Zijin Yinhuai Gold Refinery Co., Ltd. | CHINA |
| Gold | Marsam Metals* | BRAZIL |
| Gold | Materion* | UNITED STATES |
| Gold | Matsuda Sangyo Co., Ltd.* | JAPAN |

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|------|--|--------------------|
| Gold | Metalor Technologies (Hong Kong) Ltd.* | CHINA |
| Gold | Metalor Technologies (Singapore) Pte., Ltd.* | SINGAPORE |
| Gold | Metalor Technologies (Suzhou) Ltd.* | CHINA |
| Gold | Metalor Technologies S.A.* | SWITZERLAND |
| Gold | Metalor USA Refining Corporation* | UNITED STATES |
| Gold | Metalúrgica Met-Mex Peñoles S.A. De C.V.* | MEXICO |
| Gold | Mitsubishi Materials Corporation* | JAPAN |
| Gold | Mitsui Mining and Smelting Co., Ltd.* | JAPAN |
| Gold | MMTC-PAMP India Pvt., Ltd.* | INDIA |
| Gold | Modeltech Sdn Bhd | MALAYSIA |
| Gold | Morris and Watson | NEW ZEALAND |
| Gold | Morris and Watson Gold Coast | AUSTRALIA |
| Gold | Moscow Special Alloys Processing Plant* | RUSSIAN FEDERATION |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.Ş.* | TURKEY |
| Gold | Navoi Mining and Metallurgical Combinat | UZBEKISTAN |
| Gold | Nihon Material Co., Ltd.* | JAPAN |
| Gold | Ögussa Österreichische Gold- und Silber-Scheideanstalt GmbH* | AUSTRIA |
| Gold | Ohura Precious Metal Industry Co., Ltd.* | JAPAN |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)* | RUSSIAN FEDERATION |
| Gold | OJSC Novosibirsk Refinery* | RUSSIAN FEDERATION |
| Gold | PAMP S.A.* | SWITZERLAND |
| Gold | Pease & Curren | UNITED STATES |
| Gold | Penglai Penggang Gold Industry Co., Ltd. | CHINA |
| Gold | Planta Recuperadora de Metales SpA* | CHILE |
| Gold | Prioksky Plant of Non-Ferrous Metals* | RUSSIAN FEDERATION |
| Gold | PT Aneka Tambang (Persero) Tbk* | INDONESIA |
| Gold | PX Précinox S.A.* | SWITZERLAND |
| Gold | Rand Refinery (Pty) Ltd.* | SOUTH AFRICA |
| Gold | Refinery of Seemine Gold Co., Ltd. | CHINA |
| Gold | Remondis Argentia B.V. | NETHERLANDS |
| Gold | Republic Metals Corporation* | UNITED STATES |
| Gold | Royal Canadian Mint* | CANADA |
| Gold | SAAMP* | FRANCE |

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| Gold | Sabin Metal Corp. | UNITED STATES |
| Gold | Safimet S.p.A.* | Italy |
| Gold | SAFINA A.S. | CZECH REPUBLIC |
| Gold | Sai Refinery | INDIA |
| Gold | Samduck Precious Metals* | KOREA, REPUBLIC OF |
| Gold | SAMWON Metals Corp. | KOREA, REPUBLIC OF |
| Gold | SAXONIA Edelmetalle GmbH* | GERMANY |
| Gold | Schone Edelmetaal B.V.* | NETHERLANDS |
| Gold | *SEMPA Joyería Platería S.A. | SPAIN |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | CHINA |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.* | CHINA |
| Gold | Sichuan Tianze Precious Metals Co., Ltd.* | CHINA |
| Gold | Singway Technology Co., Ltd.* | TAIWAN |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals* | RUSSIAN FEDERATION |
| Gold | Solar Applied Materials Technology Corp.* | TAIWAN |
| Gold | State Research Institute Center for Physical Sciences and Technology | LITHUANIA |
| Gold | Sudan Gold Refinery | SUDAN |
| Gold | Sumitomo Metal Mining Co., Ltd.* | JAPAN |
| Gold | SungEel HiTech* | KOREA, REPUBLIC OF |
| Gold | T.C.A S.p.A.* | ITALY |
| Gold | Tanaka Kikinzoku Kogyo K.K.* | JAPAN |
| Gold | The Refinery of Shandong Gold Mining Co., Ltd.* | CHINA |
| Gold | Tokuriki Honten Co., Ltd.* | JAPAN |
| Gold | Tongling Nonferrous Metals Group Co., Ltd. | CHINA |
| Gold | Tony Goetz NV | BELGIUM |
| Gold | TOO Tau-Ken-Altyn | KAZAKHSTAN |
| Gold | Torecom* | KOREA, REPUBLIC OF |
| Gold | Umicore Brasil Ltda.* | BRAZIL |
| Gold | Umicore Precious Metals Thailand* | THAILAND |
| Gold | Umicore S.A. Business Unit Precious Metals Refining* | BELGIUM |
| Gold | United Precious Metal Refining, Inc.* | UNITED STATES |
| Gold | Universal Precious Metals Refining Zambia | ZAMBIA |
| Gold | Valcambi S.A.* | SWITZERLAND |
| Gold | Western Australian Mint trading as The Perth Mint* | AUSTRALIA |
| Gold | WIELAND Edelmetalle GmbH* | GERMANY |
| Gold | Yamamoto Precious Metal Co., Ltd.* | JAPAN |
| Gold | Yokohama Metal Co., Ltd.* | JAPAN |
| Gold | Yunnan Copper Industry Co., Ltd. | CHINA |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation* | CHINA |
| Tantalum | Asaka Riken Co., Ltd.* | JAPAN |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd.* | CHINA |

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| Tantalum | D Block Metals, LLC* | UNITED STATES |
| Tantalum | Duoluoshan | CHINA |
| Tantalum | Exotech Inc.* | UNITED STATES |
| Tantalum | F&X Electro-Materials Ltd.* | CHINA |
| Tantalum | FIR Metals & Resource Ltd.* | CHINA |
| Tantalum | Global Advanced Metals Aizu* | JAPAN |
| Tantalum | Global Advanced Metals Boyertown* | UNITED STATES |
| Tantalum | Guangdong Rising Rare Metals-EO Materials Ltd.* | CHINA |
| Tantalum | Guangdong Zhiyuan New Material Co., Ltd.* | CHINA |
| Tantalum | H.C. Starck Co., Ltd.* | THAILAND |
| Tantalum | H.C. Starck Hermsdorf GmbH* | GERMANY |
| Tantalum | H.C. Starck Inc.* | UNITED STATES |
| Tantalum | H.C. Starck Ltd.* | JAPAN |
| Tantalum | H.C. Starck Smelting GmbH & Co. KG* | GERMANY |
| Tantalum | H.C. Starck Tantalum and Niobium GmbH* | GERMANY |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd.* | CHINA |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd.* | CHINA |
| Tantalum | Jiangxi Tuohong New Raw Material* | CHINA |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd.* | CHINA |
| Tantalum | Jiujiang Tanbre Co., Ltd.* | CHINA |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd.* | CHINA |
| Tantalum | KEMET Blue Metals* | MEXICO |
| Tantalum | KEMET Blue Powder* | UNITED STATES |
| Tantalum | King-Tan Tantalum Industry Ltd.* | CHINA |
| Tantalum | LSM Brasil S.A.* | BRAZIL |
| Tantalum | Metallurgical Products India Pvt., Ltd.* | INDIA |
| Tantalum | Mineracao Taboca S.A.* | BRAZIL |
| Tantalum | Mitsui Mining and Smelting Co., Ltd.* | JAPAN |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd.* | CHINA |
| Tantalum | NPM Silmet AS* | ESTONIA |
| Tantalum | Power Resources Ltd.* | MACEDONIA |
| Tantalum | QuantumClean* | UNITED STATES |
| Tantalum | Resind Industria e Comercio Ltda.* | BRAZIL |
| Tantalum | RFH Tantalum Smeltry Co., Ltd.* | CHINA |
| Tantalum | Solikamsk Magnesium Works OAO* | RUSSIAN FEDERATION |
| Tantalum | Taki Chemicals* | JAPAN |
| Tantalum | Telex Metals* | UNITED STATES |
| Tantalum | Ulba Metallurgical Plant JSC* | KAZAKHSTAN |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd.* | CHINA |
| Tantalum | Yichun Jin Yang Rare Metal Co., Ltd.* | CHINA |
| Tin | Alpha* | UNITED STATES |

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| Tin | An Vinh Joint Stock Mineral Processing Company | VIET NAM |
| Tin | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.* | CHINA |
| Tin | China Tin Group Co., Ltd.* | CHINA |
| Tin | CNMC (Guangxi) PGMA Co., Ltd. | CHINA |
| Tin | CV Ayi Jaya* | INDONESIA |
| Tin | CV Dua Sekawan* | INDONESIA |
| Tin | CV Gita Pesona* | INDONESIA |
| Tin | CV Tiga Sekawan* | INDONESIA |
| Tin | CV United Smelting* | INDONESIA |
| Tin | CV Venus Inti Perkasa* | INDONESIA |
| Tin | Dowa* | JAPAN |
| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | VIET NAM |
| Tin | EM Vinto* | BOLIVIA |
| Tin | Estanho de Rondônia S.A. | BRAZIL |
| Tin | Fenix Metals* | POLAND |
| Tin | Gejiu Fengming Metallurgy Chemical Plant* | CHINA |
| Tin | Gejiu Jinye Mineral Company* | CHINA |
| Tin | Gejiu Kai Meng Industry and Trade LLC* | CHINA |
| Tin | Gejiu Non-Ferrous Metal Processing Co., Ltd.* | CHINA |
| Tin | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.* | CHINA |
| Tin | Gejiu Zili Mining And Metallurgy Co., Ltd. | CHINA |
| Tin | Guangdong Hanhe Non-ferrous Metal Limited Company* | CHINA |
| Tin | Guanyang Guida Nonferrous Metal Smelting Plant* | CHINA |
| Tin | HuiChang Hill Tin Industry Co., Ltd.* | CHINA |
| Tin | Huichang Jinshunda Tin Co., Ltd.* | CHINA |
| Tin | Jiangxi Ketai Advanced Material Co., Ltd.* | CHINA |
| Tin | Jiangxi New Nanshan Technology Ltd.* | CHINA |
| Tin | Magnu's Minerais Metais e Ligas Ltda.* | BRAZIL |
| Tin | Malaysia Smelting Corporation (MSC)* | MALAYSIA |
| Tin | Melt Metais e Ligas S.A.* | BRAZIL |
| Tin | Metallic Resources, Inc.* | UNITED STATES |
| Tin | Metallo Belgium N.V.* | BELGIUM |
| Tin | Metallo Spain S.L.U.* | SPAIN |
| Tin | Mineracao Taboca S.A.* | BRAZIL |
| Tin | Minsur* | PERU |
| Tin | Mitsubishi Materials Corporation* | JAPAN |
| Tin | Modeltech Sdn Bhd | MALAYSIA |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company | VIET NAM |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd.* | THAILAND |
| Tin | O.M. Manufacturing Philippines, Inc.* | PHILIPPINES |
| Tin | Operaciones Metalurgica S.A.* | BOLIVIA |

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| Tin | PT Aries Kencana Sejahtera* | INDONESIA |
| Tin | PT Artha Cipta Langgeng* | INDONESIA |
| Tin | PT ATD Makmur Mandiri Jaya* | INDONESIA |
| Tin | PT Babel Inti Perkasa* | INDONESIA |
| Tin | PT Bangka Prima Tin* | INDONESIA |
| Tin | PT Bangka Tin Industry* | INDONESIA |
| Tin | PT Belitung Industri Sejahtera* | INDONESIA |
| Tin | PT Bukit Timah* | INDONESIA |
| Tin | PT DS Jaya Abadi* | INDONESIA |
| Tin | PT Eunindo Usaha Mandiri* | INDONESIA |
| Tin | PT Inti Stania Prima* | INDONESIA |
| Tin | PT Karimun Mining* | INDONESIA |
| Tin | PT Kijang Jaya Mandiri* | INDONESIA |
| Tin | PT Lautan Harmonis Sejahtera* | INDONESIA |
| Tin | PT Menara Cipta Mulia* | INDONESIA |
| Tin | PT Mitra Stania Prima* | INDONESIA |
| Tin | PT O.M. Indonesia* | INDONESIA |
| Tin | PT Panca Mega Persada* | INDONESIA |
| Tin | PT Premium Tin Indonesia* | INDONESIA |
| Tin | PT Prima Timah Utama* | INDONESIA |
| Tin | PT Refined Bangka Tin* | INDONESIA |
| Tin | PT Sariwiguna Binasentosa* | INDONESIA |
| Tin | PT Stanindo Inti Perkasa* | INDONESIA |
| Tin | PT Sukses Inti Makmur* | INDONESIA |
| Tin | PT Sumber Jaya Indah* | INDONESIA |
| Tin | PT Timah (Persero) Tbk Kundur* | INDONESIA |
| Tin | PT Timah (Persero) Tbk Mentok* | INDONESIA |
| Tin | PT Tinindo Inter Nusa* | INDONESIA |
| Tin | PT Tommy Utama* | INDONESIA |
| Tin | Resind Industria e Comercio Ltda.* | BRAZIL |
| Tin | Rui Da Hung* | TAIWAN |
| Tin | Soft Metais Ltda.* | BRAZIL |
| Tin | Super Ligas | Brazil |
| Tin | Thaisarco* | THAILAND |
| Tin | Tuyen Quang Non-Ferrous Metals Joint Stock Company | VIET NAM |
| Tin | White Solder Metalurgia e Mineração Ltda.* | BRAZIL |
| Tin | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.* | CHINA |
| Tin | Yunnan Tin Company Limited* | CHINA |
| Tungsten | A.L.M.T. TUNGSTEN Corp.* | JAPAN |
| Tungsten | ACL Metais Eireli* | BRAZIL |
| Tungsten | Asia Tungsten Products Vietnam Ltd.* | VIET NAM |

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| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd.* | CHINA |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd.* | CHINA |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd.* | CHINA |
| Tungsten | Ganzhou Haichuang Tungsten Co., Ltd. | CHINA |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd.* | CHINA |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd.* | CHINA |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd.* | CHINA |
| Tungsten | Ganzhou Yatai Tungsten Co., Ltd. | CHINA |
| Tungsten | Global Tungsten & Powders Corp.* | UNITED STATES |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd.* | CHINA |
| Tungsten | H.C. Starck Smelting GmbH & Co.KG* | GERMANY |
| Tungsten | H.C. Starck Tungsten GmbH* | GERMANY |
| Tungsten | Hunan Chenzhou Mining Co., Ltd.* | CHINA |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji* | CHINA |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd.* | CHINA |
| Tungsten | Hunan Litian Tungsten Industry Co., Ltd.* | CHINA |
| Tungsten | Hydrometallurg, JSC* | RUSSIAN FEDERATION |
| Tungsten | Japan New Metals Co., Ltd.* | JAPAN |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd.* | CHINA |
| Tungsten | Jiangxi Dayu Longxintai Tungsten Co., Ltd. | CHINA |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd.* | CHINA |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. | CHINA |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.* | CHINA |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd.* | CHINA |
| Tungsten | Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd.* | CHINA |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd.* | CHINA |
| Tungsten | Kennametal Fallon* | UNITED STATES |
| Tungsten | Kennametal Huntsville* | UNITED STATES |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd.* | CHINA |
| Tungsten | Moliren Ltd* | RUSSIAN FEDERATION |
| Tungsten | Niagara Refining LLC* | UNITED STATES |
| Tungsten | Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC* | VIET NAM |
| Tungsten | Philippine Chuangxin Industrial Co., Inc.* | PHILIPPINES |
| Tungsten | South-East Nonferrous Metal Company Limited of Hengyang City* | CHINA |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd.* | VIET NAM |
| Tungsten | Unecha Refractory metals plant* | RUSSIAN FEDERATION |
| Tungsten | Vietnam Youngsun Tungsten Industry Co., Ltd.* | VIET NAM |
| Tungsten | Wolfram Bergbau und Hütten AG* | AUSTRIA |
| Tungsten | Woltech Korea Co., Ltd.* | KOREA, REPUBLIC OF |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd.* | CHINA |
| Tungsten | Xiamen Tungsten Co., Ltd.* | CHINA |

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| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.* | CHINA |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd.* | CHINA |

* Denotes smelters and refiners which have received a “conflict-free” designation from an independent third party audit program as of May 1, 2018.

Country of Origin Information:

As a result of the reasonable country of origin inquiry conducted as described above, Kodak concluded that the aggregated countries of origin from which the smelters and refiners listed above are believed to have sourced conflict minerals include Australia, Austria, Belgium, Bolivia, Brazil, Canada, China, Czech Republic, Estonia, France, Germany, India, Indonesia, Italy, Japan, Kazakhstan, Korea (Republic Of), Kyrgyzstan, Macedonia (The Former Yugoslav Republic Of), Malaysia, Mexico, Netherlands, New Zealand, Peru, Philippines, Poland, Russian Federation, Rwanda, Saudi Arabia, Singapore, South Africa, Spain, Sudan, Sweden, Switzerland, Taiwan, Thailand, Turkey, United Arab Emirates, United States, Uzbekistan, Viet Nam, Zambia, Zimbabwe.