

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

FORM SD  
Specialized Disclosure Report

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**Proto Labs, Inc.**

(Exact Name of Registrant as Specified in its Charter)

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**Minnesota**

(State or other jurisdiction of  
incorporation)

**001-35435**

(Commission File Number)

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**5540 Pioneer Creek Drive  
Maple Plain, Minnesota**

(Address of principal executive offices)

**55359**

(Zip Code)

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**Daniel Schumacher (763) 479-3680**

(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:

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2022.

Rule 13q-1 under the Securities Exchange Act (17 CFR 240.13q-1) for the fiscal year ended \_\_\_\_\_.

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## Section 1 – Conflict Minerals Disclosure

### Item 1.01 Conflict Minerals Disclosure and Report

#### Conflict Minerals Disclosure

Proto Labs, Inc. (the “Company” or “our”) has filed a Conflict Minerals Report for the reporting period from January 1, 2022 to December 31, 2022 (the “2022 Conflict Minerals Report”), which is referenced in Item 1.02 below, filed as an exhibit to this Form SD and also publicly available on our website at [www.protolabs.com](http://www.protolabs.com) under “Investor Relations” and “Corporate Governance - Highlights.” The content of any referenced website is not incorporated by reference into and should not be considered part of this Form SD.

#### Item 1.02 Exhibit

A copy of the Company’s 2022 Conflict Minerals Report is filed as Exhibit 1.01 attached to this Form SD.

## Section 2 – Resource Extraction Issuer Disclosure

### Item 2.01 Resource Extraction Issuer Disclosure and Report

Not applicable.

## Section 3 – Exhibits

### Item 3.01 Exhibits

The following exhibit is filed as part of this report:

| <b>Exhibit</b> | <b>Description</b>   |
|----------------|--|
| 1.01           | <a href="#">Conflict Minerals Report as required by Items 1.01 and 1.02 of this Form SD.</a> |

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## 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.

Proto Labs, Inc.

Date: June 5, 2023

By: /s/ Daniel Schumacher  
Daniel Schumacher  
Chief Financial Officer



**PROTO LABS, INC.**  
**CONFLICT MINERALS REPORT**  
**For the reporting period from January 1, 2022 to December 31, 2022**

This Conflict Minerals Report (this "Report") of Proto Labs, Inc. (the "Company," "we," "us" or "our") has been prepared pursuant to Rule 13p-1 and Form SD (the "Rule") promulgated under the Securities Exchange Act of 1934, as amended, for the reporting period from January 1, 2022 to December 31, 2022. The scope of this Report includes all of the Company's product lines, including those of 3D Hubs, Inc. ("Hubs"), which was acquired by the Company in January 2021.

The Rule requires disclosure of certain information when a company manufactures or contracts to manufacture products for which the minerals specified in the Rule are necessary to the functionality or production of those products. The specified minerals, which we collectively refer to in this Report as the "Conflict Minerals," are gold, columbite-tantalite (coltan), cassiterite and wolframite, or their derivatives, which are limited to tantalum, tin and tungsten. The "Covered Countries" for the purposes of the Rule are the Democratic Republic of the Congo, the Republic of the Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola. As described in this Report, the Company manufactures certain products for which the Conflict Minerals are necessary to the functionality or production of those products.

### **Proto Labs, Inc. Overview**

Proto Labs, Inc. is an e-commerce driven digital manufacturer of custom prototypes and on-demand production parts. We utilize injection molding, computer numerical control ("CNC") machining, 3D printing and sheet metal fabrication processes to manufacture custom parts for product developers and engineers. We offer several plastic and metal material options to our customers who select the proper material(s) for production of their parts. A very limited number of the metal materials we offer for production of parts have been identified as containing Conflict Minerals (the "Covered Products").

We have established management systems to support the execution of our Conflict Minerals program and ensure it operates effectively and is sustainable into the future. We have adopted a policy affirming our commitment to conducting business fairly and ethically with respect for human rights and in compliance with applicable laws and regulations, including the Rule, which is available on our website (the "Conflict Minerals Policy"). Our policy also affirms our support for the responsible sourcing of Conflict Minerals through our global supply chain, and states that we are actively and diligently working with our global supply chain partners to determine the origin of any Conflict Minerals they may supply to us, and that we will continue to work with them toward the goal of providing greater supply chain transparency and responsible sourcing. In addition to establishing the Conflict Minerals Policy, we have assembled a cross-functional team to implement and oversee our Conflict Minerals compliance program. We have a process in place to engage our suppliers to educate them about the Rule and request information from them regarding Conflict Minerals, and to collect, analyze and retain any such information received from them.

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

We do not directly source Conflict Minerals. Instead, we purchase raw materials from third-party suppliers that are multiple layers removed from the smelters and refiners of the Conflict Minerals that are in the raw materials ultimately supplied to us. We must therefore rely on our suppliers to provide information regarding the origin of Conflict Minerals that are included in such materials.

For the calendar year 2022 reporting period, we worked with a third-party provider of conflict minerals validation services to assist us in our good faith reasonable country of origin inquiry regarding the Conflict Minerals contained in the products we manufacture. We evaluated the products we manufactured for our customers and determined that certain products manufactured during calendar year 2022 were manufactured with raw materials that may contain Conflict Minerals that are necessary to the functionality or production of those products. We identified 109 suppliers of those raw materials, and surveyed each of them using the Conflict Minerals Reporting Template (the "CMRT") developed by the Responsible Minerals Initiative (the "RMI"). We requested that these suppliers make similar inquiries of their suppliers and sub-suppliers until the smelters and refiners of any Conflict Minerals in the raw materials supplied to us could be identified and compared to the conflict-free smelters and refiners lists developed and maintained by the RMI.

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## **Due Diligence**

### ***Due Diligence Design and Framework***

Because we could not determine that all the Conflict Minerals in the Covered Products did not originate in a Covered Country or originated from recycled or scrap sources based on the responses to the CMRTs, we exercised due diligence on the source and chain of custody of the Conflict Minerals. The Company's due diligence measures have been designed to conform to the five-step framework in the Organization for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chain of Minerals from Conflict-Affected and High Risk Areas: Third Edition, including the related supplements on gold, tin, tantalum and tungsten (the "OECD Guidance").

### ***Due Diligence Measures Performed***

The objective of the due diligence performed was to determine the source and chain of custody of the Conflict Minerals contained in the Covered Products and to determine whether any of those Conflict Minerals are associated with armed groups in the Covered Countries. For the Covered Products manufactured during the calendar year ended December 31, 2022, the Company's Operations, Compliance and Finance Departments were involved in the due diligence process.

As part of our due diligence, we reviewed supplier responses to each CMRT and followed up with suppliers who did not provide us with a timely response by escalating communication with unresponsive suppliers to the stakeholders in charge of the business relationship. In reviewing supplier responses, we challenged responses that did not respond on a product level and compared the information reported on the CMRTs to our knowledge of the composition of the materials contained in the Covered Products. We also followed-up on responses to try to get smelters and refiners information so that we could independently verify the information reported on each CMRT.

### ***Due Diligence Results***

95 of the 109 suppliers surveyed returned to us a completed CMRT, each reporting to us that the Conflict Minerals in the materials supplied to us for our Covered Products either 1) do not come from the Covered Countries or 2) are largely conformant to the RMI assessment protocols for conflict free sourcing, with four of the smelters and refiners listed as nonconformant, one listed as active and one where outreach is required. A listing of the known smelters and refiners identified by the Company's suppliers is included in Annex I below. For the suppliers that returned a survey, we were able to identify country of origin data for all smelters and refiners and note that no smelters or refiners were listed as high risk. Although we did not receive a response from 14 suppliers, we are filing this Report as we do not believe the information received from our suppliers and our additional due diligence efforts for calendar year 2022 are sufficient to determine the exact country of origin of the Conflict Minerals in our Covered Products. We are continuing to work with our suppliers to monitor risks in our supply chain to ensure compliance with our Conflict Minerals Policy.

### ***Future Steps to Mitigate Risk***

The Company expects to take the following steps, among others, to continue to improve its due diligence measures and to further mitigate the risk that any Conflict Minerals necessary to the functionality of any of the Company's products finance or benefit armed groups in the Covered Countries: continuing to engage with suppliers to obtain current, accurate and complete information about the supply chain; encouraging suppliers to implement responsible sourcing and to have them encourage smelters and refiners to obtain a "conflict-free" designation from an independent, third-party auditor; and engaging in industry initiatives encouraging "conflict-free" supply chains.

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**Annex I**

***As of May 8, 2023***

The below list of Smelters or Refiners ("SORs") were identified to the Company by our suppliers as following the RMI protocols as of May 8, 2023. The Company is typically many tiers in the supply chain removed from SORs, and our direct suppliers have not traced materials supplied to us back to individual SORs. Many of our suppliers provided information to the Company on all SORs identified to them by their suppliers, and have not been able to confirm that Conflict Minerals processed by these SORs have been used in the products they have supplied us because they did not provide their CMRT at the product level. Therefore, it is possible that the list contains SORs not used to process Conflict Minerals contained in our products.

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**Annex I  
Smelters and Refiners**

| <b>Metal</b> | <b>Smelter or Refiner Name</b>                    | <b>Location (Country)</b>        | <b>RMAP Audit Status</b> |
|--------------|---|----------------------------------|--------------------------|
| Gold         | Guangdong Jinding Gold Limited                    | China                            | Outreach Required        |
| Tantalum     | AMG Brasil  | Brazil                           | Conformant               |
| Tantalum     | Changsha South Tantalum Niobium Co., Ltd.         | China                            | Conformant               |
| Tantalum     | D Block Metals, LLC                               | United States Of America         | Conformant               |
| Tantalum     | F&X Electro-Materials Ltd.                        | China                            | Conformant               |
| Tantalum     | FIR Metals & Resource Ltd.                        | China                            | Conformant               |
| Tantalum     | Global Advanced Metals Aizu                       | Japan                            | Conformant               |
| Tantalum     | Global Advanced Metals Boyertown                  | United States Of America         | Conformant               |
| Tantalum     | Hengyang King Xing Lifeng New Materials Co., Ltd. | China                            | Conformant               |
| Tantalum     | Jiangxi Dinghai Tantalum & Niobium Co., Ltd.      | China                            | Conformant               |
| Tantalum     | Jiangxi Tuohong New Raw Material                  | China                            | Conformant               |
| Tantalum     | JiuJiang JinXin Nonferrous Metals Co., Ltd.       | China                            | Conformant               |
| Tantalum     | Jiujiang Tanbre Co., Ltd.                         | China                            | Conformant               |
| Tantalum     | Jiujiang Zhongao Tantalum & Niobium Co., Ltd.     | China                            | Conformant               |
| Tantalum     | KEMET de Mexico                                   | Mexico                           | Conformant               |
| Tantalum     | Materion Newton Inc.                              | United States Of America         | Conformant               |
| Tantalum     | Metallurgical Products India Pvt., Ltd.           | India                            | Conformant               |
| Tantalum     | Mineracao Taboca S.A.                             | Brazil                           | Conformant               |
| Tantalum     | Mitsui Mining and Smelting Co., Ltd.              | Japan                            | Conformant               |
| Tantalum     | Ningxia Orient Tantalum Industry Co., Ltd.        | China                            | Conformant               |
| Tantalum     | NPM Silmet AS                                     | Estonia                          | Conformant               |
| Tantalum     | QuantumClean                                      | United States Of America         | Conformant               |
| Tantalum     | Resind Industria e Comercio Ltda.                 | Brazil                           | Conformant               |
| Tantalum     | Taki Chemical Co., Ltd.                           | Japan                            | Conformant               |
| Tantalum     | TANIOBIS Co., Ltd.                                | Thailand                         | Conformant               |
| Tantalum     | TANIOBIS GmbH                                     | Germany                          | Conformant               |
| Tantalum     | TANIOBIS Japan Co., Ltd.                          | Japan                            | Conformant               |
| Tantalum     | TANIOBIS Smelting GmbH & Co. KG                   | Germany                          | Conformant               |
| Tantalum     | Telex Metals                                      | United States Of America         | Conformant               |
| Tantalum     | Ulba Metallurgical Plant JSC                      | Kazakhstan                       | Conformant               |
| Tantalum     | XIMEI RESOURCES (GUANGDONG) LIMITED               | China                            | Conformant               |
| Tantalum     | XinXing HaoRong Electronic Material Co., Ltd.     | China                            | Conformant               |
| Tantalum     | Yanling Jincheng Tantalum & Niobium Co., Ltd.     | China                            | Conformant               |
| Tin          | Alpha   | United States Of America         | Conformant               |
| Tin          | Aurubis Beerse                                    | Belgium                          | Conformant               |
| Tin          | Aurubis Berango                                   | Spain                            | Conformant               |
| Tin          | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | China                            | Conformant               |
| Tin          | Chifeng Dajingzi Tin Industry Co., Ltd.           | China                            | Conformant               |
| Tin          | China Tin Group Co., Ltd.                         | China                            | Conformant               |
| Tin          | CRM Synergies                                     | Spain                            | Conformant               |
| Tin          | CV Venus Inti Perkasa                             | Indonesia                        | Conformant               |
| Tin          | Dowa  | Japan                            | Conformant               |
| Tin          | EM Vinto  | Bolivia (Plurinational State Of) | Conformant               |
| Tin          | Fenix Metals                                      | Poland                           | Conformant               |
| Tin          | Gejiu Kai Meng Industry and Trade LLC             | China                            | Non Conformant           |
| Tin          | Gejiu Non-Ferrous Metal Processing Co., Ltd.      | China                            | Conformant               |
| Tin          | Guangdong Hanhe Non-Ferrous Metal Co., Ltd.       | China                            | Conformant               |
| Tin          | Jiangxi New Nanshan Technology Ltd.               | China                            | Conformant               |
| Tin          | Luna Smelter, Ltd.                                | Rwanda                           | Conformant               |
| Tin          | Magnu's Minerais Metais e Ligas Ltda.             | Brazil                           | Conformant               |
| Tin          | Malaysia Smelting Corporation (MSC)               | Malaysia                         | Conformant               |
| Tin          | Melt Metais e Ligas S.A.                          | Brazil                           | Non Conformant           |
| Tin          | Metallic Resources, Inc.                          | United States Of America         | Conformant               |
| Tin          | Mineracao Taboca S.A.                             | Brazil                           | Conformant               |
| Tin          | Minsur  | Peru                             | Conformant               |
| Tin          | Mitsubishi Materials Corporation                  | Japan                            | Conformant               |

|          |   |                                  |                |
|----------|---|----------------------------------|----------------|
| Tin      | O.M. Manufacturing (Thailand) Co., Ltd.                       | Thailand                         | Conformant     |
| Tin      | O.M. Manufacturing Philippines, Inc.                          | Philippines                      | Conformant     |
| Tin      | Operaciones Metalurgicas S.A.                                 | Bolivia (Plurinational State Of) | Conformant     |
| Tin      | PT Aries Kencana Sejahtera                                    | Indonesia                        | Conformant     |
| Tin      | PT Artha Cipta Langgeng                                       | Indonesia                        | Conformant     |
| Tin      | PT ATD Makmur Mandiri Jaya                                    | Indonesia                        | Conformant     |
| Tin      | PT Babel Surya Alam Lestari                                   | Indonesia                        | Conformant     |
| Tin      | PT Bangka Serumpun  | Indonesia                        | Conformant     |
| Tin      | PT Cipta Persada Mulia  | Indonesia                        | Conformant     |
| Tin      | PT Menara Cipta Mulia   | Indonesia                        | Conformant     |
| Tin      | PT Mitra Stania Prima   | Indonesia                        | Conformant     |
| Tin      | PT Mitra Sukses Globalindo                                    | Indonesia                        | Conformant     |
| Tin      | PT Prima Timah Utama  | Indonesia                        | Conformant     |
| Tin      | PT Rajawali Rimba Perkasa                                     | Indonesia                        | Conformant     |
| Tin      | PT Refined Bangka Tin   | Indonesia                        | Conformant     |
| Tin      | PT Sariwiguna Binasentosa                                     | Indonesia                        | Conformant     |
| Tin      | PT Stanindo Inti Perkasa                                      | Indonesia                        | Conformant     |
| Tin      | PT Timah Nusantara  | Indonesia                        | Active         |
| Tin      | PT Timah Tbk Kundur   | Indonesia                        | Conformant     |
| Tin      | PT Timah Tbk Mentok   | Indonesia                        | Conformant     |
| Tin      | PT Tinindo Inter Nusa   | Indonesia                        | Non Conformant |
| Tin      | Resind Industria e Comercio Ltda.                             | Brazil                           | Conformant     |
| Tin      | Rui Da Hung   | Taiwan, Province Of China        | Conformant     |
| Tin      | Thaisarco   | Thailand                         | Conformant     |
| Tin      | Tin Smelting Branch of Yunnan Tin Co., Ltd.                   | China                            | Conformant     |
| Tin      | Tin Technology & Refining                                     | United States Of America         | Conformant     |
| Tin      | White Solder Metalurgia e Mineracao Ltda.                     | Brazil                           | Conformant     |
| Tin      | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.                 | China                            | Conformant     |
| Tungsten | A.L.M.T. Corp.  | Japan                            | Conformant     |
| Tungsten | ACL Metais Eireli   | Brazil                           | Non Conformant |
| Tungsten | Asia Tungsten Products Vietnam Ltd.                           | Viet Nam                         | Conformant     |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd.                          | China                            | Conformant     |
| Tungsten | Ganzhou Haichuang Tungsten Co., Ltd.                          | China                            | Conformant     |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd.                   | China                            | Conformant     |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd.                       | China                            | Conformant     |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd.                            | China                            | Conformant     |
| Tungsten | Global Tungsten & Powders LLC                                 | United States Of America         | Conformant     |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd.                          | China                            | Conformant     |
| Tungsten | H.C. Starck Tungsten GmbH                                     | Germany                          | Conformant     |
| Tungsten | Hunan Chenzhou Mining Co., Ltd.                               | China                            | Conformant     |
| Tungsten | Hunan Jintai New Material Co., Ltd.                           | China                            | Conformant     |
| Tungsten | Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou         |                                  | Conformant     |
| Tungsten | Tungsten Products Branch                                      | China                            |                |
| Tungsten | Japan New Metals Co., Ltd.                                    | Japan                            | Conformant     |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd.               | China                            | Conformant     |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd.                            | China                            | Conformant     |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | China                            | Conformant     |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd.                  | China                            | Conformant     |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd.                           | China                            | Conformant     |
| Tungsten | Kennametal Fallon   | United States Of America         | Conformant     |
| Tungsten | Kennametal Huntsville   | United States Of America         | Conformant     |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd.                               | China                            | Conformant     |
| Tungsten | Masan High-Tech Materials                                     | Viet Nam                         | Conformant     |
| Tungsten | Niagara Refining LLC  | United States Of America         | Conformant     |
| Tungsten | Philippine Chuangxin Industrial Co., Inc.                     | Philippines                      | Conformant     |
| Tungsten | TANIOBIS Smelting GmbH & Co. KG                               | Germany                          | Conformant     |
| Tungsten | Wolfram Bergbau und Hutten AG                                 | Austria                          | Conformant     |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd.                              | China                            | Conformant     |
| Tungsten | Xiamen Tungsten Co., Ltd.                                     | China                            | Conformant     |



**Annex II**  
**List of countries of origin of Conflict Minerals**

Åland Islands

American Samoa

Andorra

Angola

Argentina

Armenia

Australia

Austria

Belgium

Benin

Bolivia (Plurinational State of)

Brazil

Burundi

Cambodia

Canada

Chile

China

Colombia

Congo

Democratic Republic of Congo

Djibouti

Ecuador

Egypt

Eritrea

Estonia

Ethiopia

France

Georgia

Germany

Ghana

Guam

Guinea

Guyana

Hong Kong

Hungary

India

Indonesia

Ireland

Israel

Italy

Japan

Jersey

Kazakhstan

Korea

Luxembourg

Madagascar

Malaysia

Mali

Mexico

Mongolia

Morocco

Mozambique

Myanmar

Namibia

Netherlands

Niger

Nigeria

Panama

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Papua New Guinea

Peru

Philippines

Poland

Portugal

Russian Federation

Rwanda

Saudi Arabia

Sierra Leone

Singapore

Slovenia

South Africa

South Sudan

Spain

Sudan

Suriname

Switzerland

Taiwan

Tanzania

Thailand

Turkey

Uganda

United Arab Emirates

United Kingdom

United States

Uzbekistan

Viet Nam

Zambia

Zimbabwe