

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

FORM SD  
Specialized Disclosure Report



THE PROCTER & GAMBLE COMPANY  
(Exact name of registrant as specified in its charter)

Ohio  
(State or other jurisdiction  
of incorporation)

1-434  
(Commission File Number)

31-0411980  
(IRS Employer  
Identification Number)

One Procter & Gamble Plaza, Cincinnati, Ohio  
(Address of principal executive offices)

45202  
Zip Code

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

(513) 983-1100

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.

Section 1 - Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

The Procter & Gamble Company (the "Company") is filing this Specialized Disclosure Report (Form SD), including the Conflict Minerals Report attached as Exhibit 1.01 hereto, for the calendar year ended December 31, 2021 to comply with Rule 13p-1 of the Securities Exchange Act of 1934, as amended. This report has been posted and is publicly available on the Company's website at <http://us.pg.com/sustainability/community-impact/policies-practices/conflict-materials>. Information on the Company's website is not and should not be considered part of, nor is it incorporated by reference into, this Form SD.

Item 1.02 Exhibit

The Company's Conflict Minerals Report for calendar year 2021 is filed as Exhibit 1.01 of this report and is incorporated herein by reference.

Section 2 - Exhibits

Exhibit No.	Description
1.01	<a href="#">Conflict Minerals Report of The Procter &amp; Gamble Company, as required by Items 1.01 and 1.02 of this Form.</a>

SIGNATURE

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 undersigned hereunto duly authorized.

THE PROCTER & GAMBLE COMPANY

BY: /s/ Andre Schulten  
Andre Schulten  
Chief Financial Officer  
May 27, 2022

## The Procter & Gamble Company Conflict Minerals Report

This Conflict Minerals Report for the year ended December 31, 2021 is provided by The Procter & Gamble Company (the “Company”) pursuant to Rule 13p-1 under the Securities Exchange Act of 1934 (the “Rule”). Under the Rule, we are required to make certain disclosures regarding our manufactured products (and products we contract to be manufactured) that contain conflict minerals, provided those conflict minerals are necessary to the functionality or production of those products. As defined by the Rule, and for purposes of this report, the conflict minerals are cassiterite, columbite-tantalite, gold, wolframite, and their derivatives, which are limited to tin, tantalum, and tungsten (“Conflict Minerals”; tin, tantalum, tungsten and gold collectively are referred to as “3TG”). References in this report to “we,” “us” or “our” refers to the Company and our subsidiaries, unless otherwise specified or unless the context otherwise requires.

As detailed below, based on our reasonable country of origin inquiry, the Company has no reason to believe that the 3TG in any of our products is funding armed conflict in the Democratic Republic of Congo or an adjoining country (collectively, the “Covered Countries”). However, it remains challenging for many companies and their suppliers (including us and our suppliers) to gather complete and reliable data. For that reason, we have not been able to rule out the possibility that some Conflict Minerals in our products may have originated in the Covered Countries and may not be from recycled or scrap sources. Consequently, we exercised due diligence on the Conflict Minerals’ origin and chain of custody, and we are providing this Conflict Minerals Report to describe our due diligence processes and results.

### 1. Company Overview

The Company is a global leader in retail goods, focused on providing branded consumer packaged goods of superior quality and value to our consumers around the world. Our products are sold in more than 180 countries and territories primarily through mass merchandisers, grocery stores, membership club stores, drug stores, department stores, salons, high-frequency stores, and distributors.

The vast majority of the Company’s products do not contain Conflict Minerals. Based on an extensive review of our products, only a small number of products were identified as falling within the scope of the Rule: blades and razors, electric charging devices, electric toothbrushes, powered beauty devices, and small electronic appliances.

### 2. Conflict Minerals Program and Compliance Systems

#### a) Conflict Minerals Policy Statement

The Company has adopted the following Conflict- Minerals Policy Statement, which is publicly available on our website at <https://us.pg.com/policies-and-practices/conflict-free-materials/>:

*We're committed to ensuring that we are not sourcing minerals (tin, tantalum, tungsten, gold) that fund armed groups in the Democratic Republic of Congo and adjoining countries. We do not ban sourcing of minerals from this region because such a policy may harm legitimate miners.*

*We're taking steps across our entire supply chain to confirm our sourcing does not fund armed groups in the DRC and adjoining countries. As part of this program, we continue to carry out a reasonable country of origin inquiry on the products we manufacture and perform supply chain due diligence following the processes and procedures set forth in the Organisation for Economic Co-operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Our Chief Ethics and Compliance Officer is responsible for the efforts of this team.*

*We expect suppliers to have a policy in place and implement a system to trace the origin of tin, tantalum, tungsten, and gold supplied to the Company, following the template developed by the Responsible Minerals Initiative. Suppliers are encouraged to report any ethical concerns or policy violations, as outlined at <https://pgsupplier.com/guidelines/report-a-concern>. This reporting mechanism is operated by a third-party supplier to help ensure anonymity.*

*If any external business partner has challenges in complying with our expectation, we'll attempt to work to address these challenges. If compliance cannot be achieved, we will terminate the relationship with the external business partner.*

#### b) Internal Management Systems and Controls

##### i) Compliance Team

In order to facilitate our compliance with the Rule, the Company created a multi-functional core team (“Core Team”), which includes representatives from Purchases, Product Supply, Sustainability, Research & Development, Finance & Accounting, Global Business Services, Corporate Communications, Corporate Compliance, and Legal. The Core Team designed an extensive Conflict Minerals Program, including, but not limited to, processes for supply chain review, supplier and employee outreach, due diligence, and risk management. Our Chief Ethics & Compliance Officer is responsible for the efforts of the Core Team.

##### ii) Control Systems

As a downstream company, the Company does not generally have a direct relationship with mines from which mineral ores are extracted, or with 3TG smelters and refiners or other upstream participants. Consequently, we have engaged with other companies through trade associations and industry initiatives, such as the Responsible Business Alliance-Global e-Sustainability Initiative’s (“RBA-GeSI”) Responsible Minerals Initiative (“RMI”), to improve transparency with respect to smelters and other upstream participants in the Conflict Minerals supply chain.

In addition to our Conflict Minerals Policy, our work is governed by:

- our Worldwide Business Conduct Manual, which contains the global standards P&G employees must follow to ensure they uphold P&G’s Purpose, Values and Principles in their daily work (available at <https://us.pg.com/policies-and-practices/worldwide-business-conduct-manual/>);

### **iii) Supplier Engagement**

We have engaged with our suppliers to ensure they are aware of the Rule and the implications for them as suppliers of the Company. The Company communicates with all Company suppliers that we anticipate would be within the scope of the Rule, informing them that we expect each in-scope supplier to implement a system to trace the origin of any 3TG supplied to the Company, including by collecting the supplier and smelter information called for by the conflict minerals reporting template developed by the RMI (the “Template”), which we provide to each direct supplier. We also provide a Company contact to answer any questions the suppliers have regarding implementation of the Rule.

As described in our Conflict Minerals Policy, we will engage with any of our suppliers if we have reason to believe that the supplier is providing the Company with 3TG that may finance or benefit armed groups in the Covered Countries, with the goal of establishing an alternative source of 3TG that does not support such conflict. To date, we have found no instance where there is reason to believe our sourcing of 3TG is being used to finance or benefit armed groups in the Covered Countries; therefore, it has not been necessary to seek alternative sources or terminate a contract.

### **iv) Grievance Mechanism**

The Company is committed to creating an environment that fosters open communication. The Company has well-established grievance mechanisms through which both employees and suppliers can report violations of the law or Company policies. For employees, the Company has created the Worldwide Business Conduct Manual Helpline (the “Helpline”), which is staffed by an independent third party and provides an anonymous way to report concerns about potential violations 24 hours a day, 7 days a week. For suppliers, the Company encourages them to report any ethical concerns or policy violations, as outlined at <https://secure.ethicspoint.com/domain/media/en/gui/73321/index.html>. This reporting mechanism is operated by a third-party supplier to help ensure anonymity.

For the period covered by this report, the Company received no reports through either mechanism indicating any potential concerns with our Conflict Minerals Policy, our 3TG sourcing, or our Conflict Minerals Program.

### **v) Maintenance of Records**

The Company has adopted a policy to maintain relevant documentation.

### **c) Identify and Assess Risks in the Supply Chain**

For 2021, we conducted a review of our direct suppliers to identify suppliers of components and materials used in products within the scope of the Rule. As a result of this review, we determined that, for 2021, there were 41 direct suppliers potentially within the scope of the Rule.

The breadth and complexity of our supply chain creates a challenge in identifying all parties who are upstream from our direct suppliers. Therefore, we must rely on our direct suppliers to provide information on the source and chain of custody of the 3TG contained in components and materials supplied to us, including sources of 3TG that are supplied to them from smelters further upstream in the supply chain.

## **3. Due Diligence**

Our due diligence measures have been designed to conform, in all material respects, with the portions of the OECD Guidance applicable to a “downstream company.”

### **a) Survey Requests**

The Company used the Template to conduct a survey of its direct suppliers that we determined potentially supplied components or materials containing 3TG, or our in-scope suppliers. The Template was developed by the RMI to facilitate disclosure and communication of information regarding a company’s supply chain and includes questions regarding the supplier’s conflict-free policy, the recipient’s engagement with its direct suppliers, and the smelters from which the suppliers (and its suppliers) source minerals. In addition, the Template contains questions about the origin of any 3TG provided by the supplier, as well as the supplier’s due diligence. Written instructions and recorded training illustrating the use of the tool are available on the RMI website.

For 2021, we asked the in-scope suppliers to provide updated Templates or report no change to Templates previously provided to us.

### **b) Survey Responses**

The Company has received Templates, in response to the current or prior surveys, or updated information from 27 of the suppliers surveyed. This response rate is lower than in previous years, reflecting a number of additions and deletions from our in-scope supplier list after a detailed supply chain review. Members of the Core Team have reviewed these responses for completeness and to determine if any potential red flags were present, in accordance with the requirements of our Conflict Minerals Program, and followed up as needed with suppliers to clarify responses.

The responses we received included varying degrees of information regarding the names and locations of 3TG smelters from which each supplier sourced minerals and whether these smelters supplied minerals that were actually used in components supplied to the Company. Some suppliers included smelter data for 3TG that we know is contained in components and materials supplied to us. For this group of smelters, which we refer to as the “known smelters” in our supply chain, we then reviewed whether the supplier indicated that the relevant smelters in its supply chain may have sourced 3TG from a Covered Country. For those suppliers reporting that the smelters in their supply chain may have sourced 3TG from a Covered Country, we analyzed and compared the known smelters against the list of facilities that have received a “conformant” designation through the RMI’s Responsible Minerals Assurance Process (“RMAP”) as of May 23, 2022. Of the 132 known smelters that suppliers reported may have sourced 3TG from the Covered Countries, 125 are designated as conformant with RMAP by RMI. The conformant known smelters are listed in Attachment A. While we have no indication that any of our remaining suppliers are sourcing from any smelters that source from the Covered Countries, we necessarily rely on the accuracy of the reporting from our suppliers on the sourcing practices of the various smelters in their supply chain, which, in turn, relies on the accuracy of the smelters’ own reporting, and we have insufficient data at this time to validate the status of any other smelters or refiners.

### **c) Reporting**

#### 4. Our Efforts to Determine the Mine or Location of Origin with Greatest Possible Specificity

As a downstream company, we rely upon our suppliers and independent assessment programs to provide upstream information such as whether the mine or location of origin is in a Covered Country, and whether smelters sourcing from Covered Countries have employed policies, practices and procedures to source these minerals in a manner that is conflict free. RMI has developed an audit protocol for verification of entities as conformant with the RMAP in accordance with the OECD Guidance and in conjunction with complementary traceability schemes in the Covered Countries. The RMAP conformant list is composed of entities that have undergone the third-party audit of the smelters' company-level management processes for responsible mineral procurement.

Our efforts to determine the mine or location of origin of necessary Conflict Minerals with the greatest possible specificity consisted primarily of a review of whether our suppliers reported that the smelters in their supply chain sourced their minerals from the Covered Countries. Where the supplier reported that a smelter may have sourced minerals from a Covered Country, we compared the list of smelters to the RMAP conformant smelter list. As of May 23, 2022, approximately 95% of the known smelters that were reported by our suppliers as potentially sourcing from a Covered Country appear on the RMAP conformant list.

#### 5. Steps to Mitigate Risk

The Company will continue to work to improve its Conflict Minerals due diligence process. To further mitigate the risk that any Conflict Minerals in our products finance or benefit armed groups, we are making the following commitments:

- a) As a Company, we will engage in continued supplier engagement to increase the number and quality of supplier responses;
- b) When we become aware of a supplier that is not in compliance with our Conflict Minerals Policy, we will engage with the supplier for a remedy and, where necessary, find an alternative source of 3TG; and
- c) We will continue to engage with relevant trade associations/industry initiatives to help improve supply chain diligence best practices consistent with OECD Guidance.

### ATTACHMENT A RMAP Conformant Smelters

The following facilities are listed by RMI as a RMAP conformant smelter or refiner, and have been reported to us by our suppliers as part of their supply chain for components and materials known to contain Conflict Minerals that may be sourced from a Covered Country. The facility names are listed as they appear on the RMI smelter list. Our supply chain includes other known smelters that our suppliers report may source 3TG from the Covered Countries, but that are not RMAP conformant.

<b>Tantalum</b>		
Changsha South Tantalum Niobium Co., Ltd.	Jiujiang Tanbre Co., Ltd.	Solikamsk Magnesium Works OAO
D Block Metals, LLC	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	Taki Chemicals
F&X Electro-Materials Ltd.	KEMET de Mexico	TANIOBIS Co., Ltd.
FIR Metals & Resource Ltd.	LSM Brasil S.A.	TANIOBIS GmbH
Global Advanced Metals Aizu	Meta Materials	TANIOBIS Japan Co., Ltd.
Global Advanced Metals Boyertown	Metallurgical Products India Pvt., Ltd.	TANIOBIS Smelting GmbH & Co. KG
H.C. Starck Hermsdorf GmbH	Mineracao Taboca S.A.	Telex Metals
H.C. Starck Inc.	Mitsui Mining and Smelting Co., Ltd.	Ulba Metallurgical Plant JSC
Hengyang King Xing Lifeng New Materials Co., Ltd.	Ningxia Orient Tantalum Industry Co., Ltd.	XIMEI RESOURCES (GUANGDONG) LIMITED
Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	NPM Silmet AS	XinXing HaoRong Electronic Material Co., Ltd.
Jiangxi Tuohong New Raw Material	QuantumClean	Yanling Jincheng Tantalum & Niobium Co., Ltd.
JiuJiang JinXin Nonferrous Metals Co., Ltd.	Resind Industria e Comercio Ltda.	

<b>Tungsten</b>		
A.L.M.T. Corp.	Hunan Chunchang Nonferrous Metals Co., Ltd.	Masan High-Tech Materials
ACL Metais Eireli	Hydrometallurg, JSC	Moliren Ltd.
Asia Tungsten Products Vietnam Ltd.	Japan New Metals Co., Ltd.	Niagara Refining LLC
Chenzhou Diamond Tungsten Products Co., Ltd.	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	Philippine Chuangxin Industrial Co., Inc.
Chongyi Zhangyuan Tungsten Co., Ltd.	Jiangxi Gan Bei Tungsten Co., Ltd.	TANIOBIS Smelting GmbH & Co. KG
Fujian Ganmin RareMetal Co., Ltd.	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	Unecha Refractory metals plant
Ganzhou Haichuang Tungsten Co., Ltd.	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	Wolfram Bergbau und Hutten AG
Ganzhou Huaxing Tungsten Products Co., Ltd.	Jiangxi Yaosheng Tungsten Co., Ltd.	Woltech Korea Co., Ltd.
Ganzhou Jiangwu Ferrotungsten Co., Ltd.	JSC "Kirovgrad Hard Alloys Plant"	Xiamen Tungsten (H.C.) Co., Ltd.
Ganzhou Seadragon W & Mo Co., Ltd.	Kennametal Fallon	Xiamen Tungsten Co., Ltd.
Global Tungsten & Powders Corp.	Kennametal Huntsville	Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.
Guangdong Xianglu Tungsten Co., Ltd.	KGETS Co., Ltd.	

H.C. Starck Tungsten GmbH  
Hunan Chenzhou Mining Co., Ltd.

Lianyou Metals Co., Ltd.  
Malipo Haiyu Tungsten Co., Ltd.

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**Tin**

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Alpha  
Chenzhou Yunxiang Mining and Metallurgy Co.,  
Ltd.  
Chifeng Dajingzi Tin Industry Co., Ltd.  
China Tin Group Co., Ltd.  
Dowa  
EM Vinto  
Fenix Metals  
Gejiu Non-Ferrous Metal Processing Co., Ltd.  
Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.  
Gejiu Zili Mining And Metallurgy Co., Ltd.  
Guangdong Hanhe Non-Ferrous Metal Co., Ltd.  
HuiChang Hill Tin Industry Co., Ltd.  
Jiangxi New Nanshan Technology Ltd.  
Luna Smelter, Ltd.  
Ma'anshan Weitai Tin Co., Ltd.  
Magnum's Minerals Metais e Ligas Ltda.

Malaysia Smelting Corporation  
Metallic Resources, Inc.  
Metallo Belgium N.V.  
Metallo Spain S.L.U.  
Mineracao Taboca S.A.  
Minsur  
Mitsubishi Materials Corporation  
O.M. Manufacturing (Thailand) Co., Ltd.  
O.M. Manufacturing Philippines, Inc.  
Operaciones Metalurgicas S.A.  
PT Artha Cipta Langgeng  
PT ATD Makmur Mandiri Jaya  
PT Babel Surya Alam Lestari  
PT Bangka Serumpun  
PT Menara Cipta Mulia  
PT Mitra Stania Prima

PT Prima Timah Utama  
PT Rajawali Rimba Perkasa  
PT Rajehan Ariq  
PT Refined Bangka Tin  
PT Stanindo Inti Perkasa  
PT Timah Tbk Kundur  
PT Timah Tbk Mentok  
PT Tinindo Inter Nusa  
Resind Industria e Comercio Ltda.  
Rui Da Hung  
Soft Metais Ltda.  
Thai Nguyen Mining and Metallurgy Co., Ltd.  
Thaisarco  
Tin Technology & Refining  
White Solder Metalurgia e Mineracao Ltda.  
Yunnan Chengfeng Non-ferrous Metals Co., Ltd.  
Yunnan Tin Company Limited

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**Gold**

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L'Orfebre S.A

Emirates Gold DMCC