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

**FORM SD
Specialized Disclosure Report**

SiTime Corporation

(Exact name of registrant as specified in its charter)

Delaware

(State or other jurisdiction of
incorporation)

001-39135

(Commission File Number)

02-0713868

(I.R.S. Employer
Identification No.)

**5451 Patrick Henry Drive
Santa Clara, California**

(Address of principal executive offices)

95054

(Zip Code)

**Arthur D. Chadwick
Executive Vice President
Chief Financial Officer
(408) 328-4400**

(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, 2019 to December 31, 2019.

Section 1 - Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

This report for the year ended December 31, 2019 has been prepared by management of SiTime Corporation (the “Company,” “we,” “us,” and “our”) to comply with Section 13(p) of the Securities Exchange Act of 1934, as amended, and Rule 13p-1 (the “Rule”) promulgated thereunder and in accordance with the Instructions to Form SD except, however, that we are relying on the Updated Statement on the Effect of the Court of Appeals Decision on the Conflict Minerals Rule issued by the Division of Corporation Finance of the Securities and Exchange Commission (“SEC”) on April 7, 2017 (the “April 2017 Guidance”). As permitted under the April 2017 Guidance, this report does not address Item 1.01(c) of Form SD.

The Rule was adopted by the SEC as required by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 and imposes certain reporting obligations on SEC registrants whose manufactured products contain so-called “conflict minerals” that are necessary to the functionality or production of those products. As used in this report, the term “conflict minerals” includes columbite-tantalite (coltan), cassiterite, gold, wolframite, and their derivatives tantalum, tin and tungsten.

A copy of this report is made available on our website at www.sitime.com, under the heading “Investors.” The website and the information accessible through it are not incorporated into this report.

The Company is a fabless semiconductor company and thus is not involved in the actual mining or direct purchase of conflict minerals. The Company must rely on the good faith effort of its suppliers to provide information regarding the origin of conflict minerals used to manufacture products supplied to the Company. We also rely on information collected and provided by the Responsible Minerals Initiative (“RMI”) (formerly the Conflict-Free Sourcing Initiative) obtained through their independent third-party audit programs.

The Company has adopted a Conflict Minerals Policy stating its commitment to eliminate the use of conflict minerals. The Company’s policy also states its expectation that its suppliers survey their supply chains and only use sources that are verified to be compliant by RMI or the equivalent. The RMI is a global program where an independent third party evaluates a smelter’s procurement activities and determines if the smelter demonstrated that materials they processed originated from conflict-free sources. Through this industry collaborative effort, smelters are audited globally. The list of compliant smelters and refiners is posted at www.responsiblemineralsinitiative.org.

Reasonable Country of Origin Inquiry

We conducted a Reasonable Country of Origin Inquiry (“RCOI”) in reliance upon:

- Sending inquiries to our suppliers, explaining the Rule and referring the suppliers to online training materials and instructions available on the RMI website (www.responsiblemineralsinitiative.org).
- Our suppliers provided information on a template that has been widely adopted to assist companies in their due diligence processes related to conflict minerals. The template was developed to facilitate disclosure and communication of information regarding smelters that provide material to a company’s supply chain. It includes questions regarding a company’s conflict-free policy, engagement with its direct suppliers, and a listing of the smelters the company and its suppliers use. In addition, the template contains questions about the origin of conflict minerals included in suppliers’ products, as well as supplier due diligence.
- Reviewing responses that we received from our suppliers and following up on inconsistent, incomplete and responses that are unclear.
- Sending reminders to suppliers who did not respond and encouraging them to provide the information.

We believe our RCOI process was reasonably designed to determine (a) whether any of the conflict minerals contained in our products originated in the Covered Countries (as defined by the Rule) and (b) whether any of the conflict minerals are from recycled or scrap sources, and was performed in good faith. However, there are inherent limitations in the information provided by third parties, including but not limited to potential inaccuracies, incompleteness or falsified information despite our efforts to review the information.

Results

All of our key suppliers responded and indicated that such minerals (tantalum, tin, tungsten and gold) contained in our products originated in the Covered Countries. These suppliers also confirmed that most of the smelters where the minerals originated from participated in the RMI flagship program and were conformant to RMAP. However, as not every supplier responded or could confirm compliance with RMAP, the Company does not have sufficient information and is therefore unable to determine the origin of all of conflict minerals used in its products.

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 duly authorized undersigned.

SITIME CORPORATION

May 29, 2020

By: /s/ Arthur D. Chadwick
Arthur D. Chadwick
Executive Vice President, Chief Financial Officer