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

FORM SD

SPECIALIZED DISCLOSURE REPORT

SYNOPSYS, INC.

(Exact name of Registrant as specified in charter)

Delaware
(State or other jurisdiction
of incorporation)

000-19807
(Commission
File Number)

56-1546236
(I.R.S. Employer
Identification No.)

690 East Middlefield Road
Mountain View, California 94043
(Address of principal executive offices)

John F. Runkel, Jr.
General Counsel and Corporate Secretary
Synopsys, Inc.
690 East Middlefield Road
Mountain View, California 94043
(650) 584-5000

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

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2020.

Section 1 – CONFLICT MINERALS DISCLOSURE**Item 1.01 Conflict Minerals Disclosure and Report*****Conflict Minerals Disclosure***

Synopsys, Inc. (Synopsys) has filed a Conflict Minerals Report as Exhibit 1.01 to this Form SD. The report is also publicly available on Synopsys' website at <https://www.synopsys.com/company/corporate-social-responsibility/supply-chain.html>.

Item 1.02 Exhibit

The Conflict Minerals Report required by Item 1.01 is filed as Exhibit 1.01 to this Form SD.

Section 2 – EXHIBITS**Item 2.01 Exhibits**

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

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.

SYNOPSYS, INC.

Dated: May 28, 2021

By: /s/ JOHN F. RUNKEL, JR.

John F. Runkel, Jr.

General Counsel and Corporate Secretary

Synopsys, Inc.
Conflict Minerals Report
For The Year Ended December 31, 2020

Synopsys, Inc. (referred to as “Synopsys,” “we,” “us,” and “our” in this report) has submitted this Conflict Minerals Report for the year ended December 31, 2020 in order to comply with Rule 13p-1 under the Securities Exchange Act, as amended. Rule 13p-1 was adopted by the Securities and Exchange Commission (SEC) to implement conflict minerals disclosure requirements, as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. Rule 13p-1 imposes reporting obligations on SEC registrants whose manufactured products contain conflict minerals that are necessary to the functionality or production of their products. Conflict minerals are currently defined as gold, cassiterite, columbite-tantalite (coltan), wolframite, and their derivatives, which are limited to tin, tantalum, and tungsten (which, together with gold, are referred to as the 3TG metals). The definition includes these minerals regardless of their geographic origin or whether or not they fund armed conflict.

In accordance with Rule 13p-1, we conducted due diligence on the source and chain of custody of the conflict minerals that were necessary to the



Record Maintenance

We stored the survey responses we received from our suppliers in an internal electronic file library. These records will be maintained for at least five years, in accordance with our internal document retention policy.

3.2 Identifying and Assessing Risk in the Supply Chain

The complexity of our products and supply chain makes it difficult for us to map our supply chain. We rely on our suppliers to provide us with information about the sources of the 3TG metals contained in the products they supply.

Identifying Relevant Suppliers

For the 2020 reporting year, we sought to survey all of our suppliers. Additionally, we identified high-priority suppliers that made up a significant percentage of our hardware product spending (High-Priority Suppliers). High-Priority Suppliers received an enhanced review in our due diligence process, which we believe is consistent with a risk-based approach to due diligence.

Information Requests

We used the CMRT to survey our suppliers. The CMRT facilitates the transfer of information regarding supplier sourcing of 3TG metals. The CMRT can be viewed in several languages and includes extensive written instructions.

Reviewing Supplier Information

Our third-party vendor reviewed our suppliers' responses for completeness and consistency. Synopsys also reviewed these responses against an internally developed list of "red flags" designed to identify responses that are incomplete, implausible, or that indicate heightened risk, such as responses reporting sourcing of 3TG metal from a Covered Country. High-Priority Suppliers were reviewed for additional red flags.

Smelter and Refiner Assessment

Our third-party vendor reviewed a consolidated list of the smelters and refiners identified by our suppliers and compared the smelter and refiner names against the RMI's list of standard smelter and refiner names (the Smelter Reference List) in order to assess the quality of the information provided to us and determine whether all identified smelters and refiners were, in fact, smelters and refiners. Our third-party vendor further compared smelter and refiner names against the Conformant Smelter and Refiner Lists. Validation under the RMAP is voluntary, and the RMAP makes no conclusions about the conflict status of sourcing by a smelter or refiner that is not on the Conformant Smelter and Refiner Lists. We also reviewed the countries of the identified smelters and refiners, as provided by our suppliers, to see if they are located in a high-risk area, such as in or adjacent to the Covered Countries.

3.3 Designing and Implementing a Strategy to Respond to Risks

Our conflict minerals program includes risk mitigation measures. For the 2020 reporting year, our expectations regarding cooperation with our due diligence process were communicated to our direct suppliers in our conflict minerals policy (available on our website and through our third-party vendor's conflict minerals supplier resource center), through a cover letter accompanying the CMRT sent to suppliers, and through web-based training offered by our third-party vendor. As described above, we reviewed our suppliers' responses for red flags. Our review was heightened for High-Priority Suppliers. We followed up with suppliers whose responses exceeded a specified number of red flags or whose responses otherwise indicated heightened risk, such as responses reporting the sourcing of 3TG metal from a Covered Country. Suppliers that exceeded red flag limits for the immediately preceding and current reporting years, or that otherwise presented heightened risk, were identified to relevant hardware product managers. We will evaluate, in light of all relevant factors, whether to continue our relationship with such suppliers.

The results of our due diligence process have been reviewed by our conflict minerals program governance team. This report and a summary of our results have been reported to our

3.4 Supporting Independent Third-Party Audits of Supply Chain Due Diligence at Identified Points in the Supply Chain

We do not have a direct relationship with the smelters or refiners of the 3TG metals contained in our products, and we therefore did not perform or direct



