

Section 1 – Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report.

Conflict Minerals Disclosure

This Specialized Disclosure Report on Form SD of O2 Micro International Limited (the “Company”) is filed pursuant to Rule 13p-1 promulgated under the Securities Exchange Act of 1934 (“Rule 13p-1”) for the reporting period of January 1, 2017, to December 31, 2017.

The Company’s business focuses on designing, developing and marketing high performance integrated circuits and solutions for manufacturers of products in the consumer electronics, computer, industrial, communications, and automotive markets. The Company designs products for applications such as LCD and LED monitors, LCD and LED televisions, notebook computers, tablet computers, low/zero emission vehicles, mobile phones, power tools, energy efficient technology relating to sophisticated batteries, LED lighting including general lighting, and portable electronics devices.

Rule 13p-1 requires disclosure of certain information when a company manufactures or contracts to have manufactured products for which the minerals specified in the Rule are necessary to the functionality or production of those products. The specified minerals are gold, columbite-tantalite (coltan), cassiterite and wolframite, including their derivatives, which are limited to tantalum, tin and tungsten (the “Conflict Minerals”). The “Covered Countries” for 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.

The Company has determined that the following Conflict Minerals are necessary to the functionality or production of certain of the Company’s products: gold, tantalum, tin and tungsten.

The Company does not own or operate the integrated circuit fabrication facilities that manufacture the Company’s products. Rather, the Company engages the foundries that own and operate these fabrication facilities to manufacture the Company’s products, sometimes using components procured by the Company from suppliers. As such, the Company does not purchase any Conflicts Minerals directly from mines, smelters or refiners, and relies upon such foundries and such suppliers to procure the raw materials and components necessary for the production of the Company’s products. The Company must therefore rely on such foundries and suppliers to provide information regarding the origin of the Conflicts Minerals.

The Company has conducted in good faith a reasonable country of origin inquiry regarding each of these minerals. The inquiry was reasonably designed to determine whether any of the Conflict Minerals originated in the Covered Countries or are from recycled or scrap sources. The country of origin inquiry involved (1) identifying those of the Company's products with respect to which Conflict Minerals are necessary for the functionality or production of such products; (2) identifying the foundries that manufacture such products and the suppliers (if any) from whom the Company procures components used in the manufacture of such products; (3) obtaining reports regarding the use of Conflict Minerals from such relevant foundries and suppliers using the Conflict Minerals Reporting Template developed by the Electronic Industry Citizenship Coalition – Global eSustainability Initiative (EICC/GeSI); (4) analyzing the reports received from such relevant foundries and suppliers to identify potential uses of Conflict Minerals that originate from the Covered Countries; and (5) engaging such foundries and suppliers with follow-up inquiries and data gathering, to the extent necessary.

Based upon the above described country of origin inquiry, the Company has no reason to believe that any of the Conflict Minerals that are necessary to the functionality or production of the Company's products may have originated in the Covered Countries.

The information is publicly available at www.o2micro.com.

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.

O2 MICRO INTERNATIONAL LIMITED

Date: March 8, 2018

By: /s/ Sterling Du
Sterling Du, Chief Executive Officer

11/30/2018 Conflict Minerals Country of Origin Worksheet

QA

CFS List : <http://www.conflictreesmelter.org/cfshome.htm>

Items

maintained <\\hc-storage-01\HC-qc\QA - Team\RoHS\GP system survey\Conflict minerals survey>

in QA folders [survey\Conflict minerals survey](#) **Including**

:

1. EICC forms from all vendors on Approved Vendors List ("AVL")
2. Declaration forms from all vendors on AVL
3. Source or transaction documents used in reporting conflict minerals usage from vendors on AVL
4. E-mails, communications and other correspondence from all vendors on AVL made hereunder
5. Follow-up communications and emails from vendors who are unable to verify sources of minerals covered under the Conflict Minerals policy.
6. All definitions of Conflict Minerals, and other terms covered under this policy, are defined under the EICC, Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (aka, the "Dodd-Frank Act"), and O2Micro's supporting policies and procedures.

Steps taken
by
O2Micro:

1. QA shall maintain most current AVL prior to performing its performing its annual audit regarding the use of Conflict Minerals.
2. QA shall send EICC compliant forms and declarations, at a minimum, to all vendors on AVL
3. QA shall confirm the collection of all EICC compliant forms and declarations from each member on AVL prior to the deadlines provided by O2Micro, and follow with said vendors who have not yet complied with policy after deadline. O2Micro will use all reasonable efforts to get all members of the AVL to comply with its Conflict Minerals reporting requirements.
4. QA shall prepare the Conflict Minerals COO Worksheet and present to management for review and approval.
5. After final approval, QA shall submit copy of the final Conflict Minerals COO Worksheet for each fiscal year to the finance and legal departments during Q1 of following fiscal year.

Based on the results of O2Micro's annual Country of Origin (COO) Inquiry, O2Micro

Conclusion: reasonably believes that Conflict Minerals have not been used in materials and products used by, or manufactured for, O2Micro.

EICC Templates, Declarations and Source Documents for each vendor		Original Mineral Source Documents						Conclusion			
		Gold	Tin	Tungsten	Tantalum	Gold	Tin	Tungsten	Tantalum		
Assembly Supplier	EICC Template	Declaration	Gold	Tin	Tungsten	Tantalum	Gold	Tin	Tungsten	Tantalum	
ASE-KS	V	V	V	V	NA	NA	C	C	NA	NA	
ASE-SH	V	V	V	V	NA	NA	C	C	NA	NA	
GTK	V	V	V	V	NA	NA	C	C	NA	NA	
TFME	V	V	V	V	NA	NA	C	C	NA	NA	
SIG-TW	V	V	V	V	NA	NA	C	C	NA	NA	
TICP	V	V	V	V	NA	NA	C	C	NA	NA	
SMC	V	V	V	V	NA	NA	C	C	NA	NA	
UAT	V	V	NA	Refuse to Provide	NA	NA	NA	C	NA	NA	
UCD	V	V	V	V	NA	NA	C	C	NA	NA	
Unisem M	V	V	NA	NA	NA	NA	NA	NA	NA	NA	
Sitec	V	V	NA	NA	NA	NA	C	C	NA	NA	
HTXA	V	V	V	V	NA	NA	C	C	NA	NA	
Wafer Fab	EICC template	Declaration	Gold	Tin	Tungsten	Tantalum	Gold	Tin	Tungsten	Tantalum	
CSMC	V	V	NA	NA	Refuse to Provide	NA	NA	NA	C	NA	
X-fab	V	Refuse to Provide	NA	NA	Refuse to Provide	NA	NA	NA	C	NA	
VIS(Vanguard)	V	V	NA	NA	Refuse to Provide. Agree to audit	Refuse to Provide. Agree to audit	NA	NA	C	C	
PSMC(Original: Maxchip)	V	V	NA	NA	Refuse to Provide	NA	NA	NA	C	NA	
SMIC	V	V	NA	NA	Refuse to Provide	Refuse to Provide	C	C	C	C	
AMPI	V	On-going	NA	NA	NA	NA	NA	NA	NA	NA	
XAHT	V	V	NA	NA	NA	NA	NA	C	NA	NA	
Excelliance	V	V	NA	NA	NA	NA	NA	NA	C	NA	
Tower Jazz	V	V	NA	NA	V	NA	NA	NA	C	NA	
TPSCo	V	V	NA	NA	NA	NA	NA	NA	C	C	
Not listed on AVL yet	LongLink	V	NA	NA	NA	NA	NA	NA	NA	NA	
	COSMOS	V	NA	NA	NA	NA	C	C	NA	NA	

Legend :

V= Verified Conflict Minerals free. See codes to right for more details.	Smelter on CFS List	C
	Reasonably reliable representations from vendors and its suppliers	R
	Cannot verify materials are free of Conflict Minerals Further due diligence required.	N

Remarks:

List date:

1. CFS Compliant Tungsten Smelters

Companies that have been determined to be compliant with the CFSP Supply Chain Transparency Smelter Audit Protocol for Tungsten by completing a CFSP compliance audit conducted by an independent third party audit.

Please note that CFSI policy requires that **no companies may appear on the CFSP Compliant Tungsten Smelters list** until a minimum of three companies meet the criteria for listing.

2. Conflict-Free Smelter Program (CFS)

Compliant Tin Smelter List

3. Conflict-Free Smelter Program

Compliant Tantalum Smelter List

4. Conflict-Free Smelter Program

Compliant Gold Refiners List

Final Rules : A registrant may satisfy the reasonable country of origin standard by obtaining **“reasonably reliable representations”** indicating the origin of the conflict materials (i.e., that they are not from the regions covered under the definition of Conflict Minerals), or that they are recycled or scrap materials. The current rule notes that such representations can be obtained from the facility directly or from the registrant’s immediate suppliers; however the registrant must have sufficient reason to believe such to be true (e.g., by considering the sources, the related facts and circumstances, and any relevant “warning signs”).

Form date: 30 Dec 2018

Metal	Smelter_IDStandard_Smelter_Name	Company_State_Province_Region	Country_Location
Cobalt	CID003226Freeport Kikkola	Kokkola, Central Ostrobothnia	FINLAND
Cobalt	CID003293 Jiangsu Xiongfeng Technology Co., Ltd.	Haimen, Jiangsu	CHINA
Cobalt	CID003338 SungEel HiTech Co.,Ltd.	Gunsan-si, Jeollabuk-do	KOREA, REPUBLIC OF
Gold	CID002863 Bangalore Refinery	Bangalore, Karnataka	INDIA
Gold	CID000264 Chugai Mining	Chiyoda, Tokyo	JAPAN
Gold	CID003195 DS PRETECH Co., Ltd.	Chopyeong-myeon, Chungcheongbuk-do	KOREA, REPUBLIC OF
Gold	CID002511 KGHM Polska Miedz Spolka Akcyjna	Lubin, Dolnośląskie	POLAND
Gold	CID003189NH Recytech Company	Pyeongtaek-si, Gyeonggi-do	KOREA, REPUBLIC OF
Tin	CID003356 Dongguan CiEXPO Environmental Engineering Co., Ltd.	Dongguan, Guangdong	CHINA
Tin	CID000555 Gejiu Zili Mining And Metallurgy Co., Ltd.	Gejiu, Yunnan	CHINA
Tin	CID003379 Ma'anshan Weitai Tin Co., Ltd.		CHINA
Tin	CID001406 PT Babel Surya Alam Lestari	Badau, Badau	INDONESIA
Tin	CID003380 PT Masbro Alam Stania	Sungailiat, Bangka Belitung	INDONESIA
Tin	CID003381 PT Rajawali Rimba Perkasa	Tukak Sadai, Bangka Belitung	INDONESIA
Tin	CID001486 PT Timah Nusantara	Tempilang, Kepulauan Bangka Belitung	INDONESIA
Tin	CID002478 PT Tirus Putra Mandiri	Bogor, West Java	INDONESIA
Tin	CID002834 Thai Nguyen Mining and Metallurgy Co., Ltd.	Thai Nguyen, Thai Nguyen	VIET NAM
Tin	CID003325 Tin Technology & Refining	West Chester, Pennsylvania	UNITED STATES OF AMERICA
Tin	CID003397 Yunnan Yunfan Non-ferrous Metals Co., Ltd.	Gejiu, Yunnan	CHINA
Tungsten	CID003388 KGETS CO., LTD.	Siheung-si, Gyeonggi-do	KOREA, REPUBLIC OF
