

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

**FORM SD**

**Specialized Disclosure Report**

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**Calix, Inc.**

(Exact name of registrant as specified in its charter)

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**Delaware**  
(State or other jurisdiction  
of incorporation)

**001-34674**  
(Commission  
File No.)

**68-0438710**  
(I.R.S. Employer  
Identification No.)

**2777 Orchard Parkway, San Jose, California 95134**  
(Address of Principal Executive Offices) (Zip Code)

**Doug McNitt,**  
**EVP, General Counsel**  
**(408) 514-3000**

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

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Check the appropriate box to indicate the rule 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, 2024.

## **Section 1 – Conflict Minerals Disclosure**

### **Item 1.01 Conflict Minerals Disclosure and Report**

#### **Conflict Minerals Disclosure**

A copy of Calix, Inc.'s Conflict Minerals Report is provided as Exhibit 1.01 to this Form SD and is publicly available at <https://investor-relations.calix.com> under Governance – Governance Documents.

#### **Item 1.02 Exhibit**

As required by Item 1.01 of this Form SD, a Conflict Minerals Report has been filed as Exhibit 1.01 to this Form SD.

## **Section 2 – Exhibits**

### **Item 2.01 Exhibits**

The following exhibit is filed as part of this Form SD:

[Exhibit 1.01 – Conflict Minerals Report as required by Items 1.01 and 1.02 of this Form SD.](#)

## **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 undersigned hereunto duly authorized.

Date: May 30, 2025

CALIX, INC.

By:                     /s/ Doug McNitt                      
**Doug McNitt**  
**EVP, General Counsel**

**Conflict Minerals Report  
Calix, Inc.  
For the Year Ended December 31, 2024**

This Conflict Minerals Report (“CMR”) is provided to comply with Rule 13p-1 of the Securities Exchange Act of 1934, as amended, for Calix, Inc. (“Calix”) for the calendar year ended December 31, 2024. Rule 13p-1, as implemented by the Securities and Exchange Commission (“SEC”), imposes reporting and disclosure requirements related to conflict minerals as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (the “Act”). Rule 13p-1 applies to SEC registrants whose manufactured products contain conflict minerals, other than conflict minerals sourced solely from recycled or scrap sources. Conflict minerals are defined as cassiterite, columbite-tantalite, gold, wolframite, and their derivatives, which are limited to tin, tantalum, tungsten and gold, referred to as 3TG.

If a registrant has reason to believe that any of the conflict minerals in their supply chain may have originated in the Democratic Republic of the Congo (“DRC”) or an adjoining country (together with the DRC, the “Covered Countries”), or a registrant is unable to determine the country of origin of those conflict minerals, then the Act requires that the registrant exercise due diligence on the source and chain of custody of those conflict minerals.

**Overview**

Calix is a leading global provider of cloud and software platforms, systems and services that focus on the access network, the portion of the network that governs available bandwidth and determines the range and quality of services that can be offered to subscribers. Calix’s cloud and software platforms enable communication service providers to provide a wide range of revenue-generating services, from basic voice and data to advanced broadband services, over legacy and next-generation access networks. Calix primarily relies upon third-party manufacturing partners to manufacture its products, including the purchase of components or materials that may contain smelted or refined minerals and the purchase of raw ore or minerals. As a result of this third-party manufacturing model, Calix is several levels removed from the purchase of raw ore and minerals, and the mining of conflict minerals. These purchases are made by Calix’s third-party manufacturers’ sub-tier suppliers.

For purposes of Rule 13p-1, Calix engaged a third-party vendor to assist with survey efforts and outreach with our third-party manufacturing partners. This process included researching whether suppliers upstream in Calix’s supply chain utilized conflict minerals in the manufacture of products for Calix, and, if so, the origin of those conflict minerals. Because Calix relies upon third-party manufacturing partners to source for and produce its products, in most cases, Calix has no visibility into the upstream suppliers and does not control the supplier sourcing decisions. In selecting manufacturing partners, Calix requires partners to regularly engage with and assess their supplier base to evaluate the components and materials used to produce Calix products.

Based on information obtained during this survey process for our manufacturing partners in 2024, Calix identified that some components and materials that are included in Calix products contain conflict minerals.

**Reasonable Country of Origin Inquiry**

In order to perform a reasonable country of origin inquiry (“RCOI”), Calix and its third party vendor, worked directly with suppliers and third-party manufacturers to conduct surveys of their direct supplier base to determine whether the conflict minerals contained in components of Calix products originated from the Covered Countries. This survey was conducted using the Conflict Minerals Reporting Template (“CMRT”) developed by the Responsible Minerals Initiative (“RMI”), and included inquiries related to the facilities used to process conflict minerals, a supplier’s commitment and processes to support conflict free sourcing and the smelters and refiners used.

For 2024, surveys were distributed to approximately 159 suppliers with a response rate of 97%.

Based on the RCOI described above, we have reason to believe that some of the components used in the manufacture of our products in 2024 contained conflict minerals that originated from the Covered Countries and were not sourced solely from recycled or scrap sources.

### **Supply Chain Due Diligence and Assessment**

Based on the RCOI, and as required by Rule 13p-1, we undertook due diligence on our supply chain to ascertain whether the conflict minerals in Calix products directly or indirectly financed or benefited arms groups in the Covered Countries. Our due diligence process is structured in accordance with the five-step framework of the Organization for Economic Co-operation and Development (“OECD”) in the publication OECD (2013) Due Diligence Guidance for Responsible Supply Chains of Minerals from High-Risk Areas: Second Edition, OECD Publishing (“OECD Guidance”) and the related Supplements for 3TG.

Based on our RCOI for 2024, there were approximately 364 smelters and refiners that were identified by suppliers as a source of conflict minerals, of which 79 were known to be sourcing conflict minerals originating from the Covered Countries. This determination was primarily based on supplier declarations within the CMRT and cross-referenced with RMI’s published list of smelters known to source from Covered Countries.

In accordance with the OECD Guidance and related supplements, Calix conducted further due diligence on its supply chain to assess the source and chain of custody of the conflict minerals, including taking the following actions:

- Collection of conflict minerals information from the supply chain utilizing the CMRT.
- Reviews of supplier, smelter and refinery information in CMRT responses for plausibility, consistency and completeness. For any inconsistencies or missing information, we directly contacted suppliers via email and phone calls, requesting clarification and additional supporting documentation.
- Follow-up efforts with suppliers for information about identified smelters and refiners.
- Engagement with suppliers for further conflict minerals reporting upstream through the supply chain, including engagement during business review meetings held on at least a quarterly cadence to emphasize the need for more granular upstream reporting and data sharing.
- Review whether identified smelters and refiners, who were identified as a source of conflict minerals originating from the Covered Countries, are listed as participating in the Responsible Minerals Assurance Process (“RMAP”) operated by the RMI or otherwise verified as conflict free by industry recognized programs
- Conduct supplier outreach as recommended and in support of RMI initiatives, particularly for non-responding suppliers

Based on the due diligence conducted, we determined that all 79 of the smelters and refiners identified to supply conflict minerals originating in the Covered Countries are included on the RMI list of conformant, active and eligible smelters and refiners. Based on the information provided by our suppliers as of May 12, 2025, we believe that the facilities in the Covered Countries that may have been used to process the conflict minerals in our products include the smelters and refiners listed in Appendix I to this CMR. Note that this list is likely to be both incomplete and over-inclusive of facilities in our supply chain. We are dependent on our third-party manufacturing partners to identify the smelters and refiners in our supply chain. Although we request suppliers to provide information specific to the parts, components and products provided to us, most responses submitted are at a company-level and not specific to our supply chain. This can result in the inclusion of smelters in Appendix I that may not be directly tied to components in Calix products, making the list over-inclusive. We are actively working to encourage our manufacturing partners to provide more granular, product-specific data. In addition, many suppliers are disclosing that they have not yet completed their own due diligence and are unable to disclose a complete list of smelters and refiners. Pursuant to Rule 13p-1, this CMR is not subject to an independent private sector audit.

## **Ongoing Risk Management**

We intend to continue our work with our manufacturing partners and suppliers to improve response rates to our conflict minerals surveys, including through direct and indirect outreach efforts, and to improve awareness upstream in the supply chain. Our goal is to increase the percentage of product-specific CMRT responses, providing us with a clearer picture of our direct supply chain. We will continue to engage with suppliers who provide company-level data to help them develop more precise reporting. We also expect to further refine conflict minerals assessments and inquiries as part of our supplier and manufacturer partner evaluation processes. This refinement includes incorporating conflict mineral performance into our supplier scoring mechanisms and engaging in targeted discussions with high-volume or high-risk suppliers to improve their due diligence practices. This CMR is also available on Calix's Investor Relations website at: <https://investor-relations.calix.com> under Governance – Governance Documents.

## **Forward-Looking Statements**

Statements made in this report that are not statements of historical fact are forward-looking statements. Forward-looking statements are subject to the “safe harbor” provisions of the Private Securities Litigation Reform Act of 1995. Forward-looking statements are based on our current expectations and assumptions about our business and operations and are subject to risks and uncertainties that could cause actual results to differ materially from expectations. These risks and uncertainties include the effect of changes in laws and regulations, economic, market and business conditions, the performance and operations of third-party partners and suppliers, availability of critical components and materials, and other risks as described in our Form 10-K and our quarterly reports on Form 10-Q, each as filed with the SEC. Forward-looking statements speak only as of the date the statements are made and are based on information available to us at the time those statements are made and/or management's good faith belief as of that time with respect to future events. We assume no obligation to update forward-looking statements to reflect actual performance or results, changes in assumptions or changes in other factors affecting forward-looking information, except to the extent required by applicable securities laws.

### Appendix I

<b>Smelter ID</b>	<b>Smelter Name</b>	<b>Metal</b>	<b>Smelter Country</b>
CID000004	A.L.M.T. Corp.	Tungsten	Japan
CID003185*	African Gold Refinery	Gold	Uganda
CID003427	Albasteel Industria e Comercio de Ligas Para Fundicao Ltd.	Tungsten	Brazil
CID000041	Almalyk Mining and Metallurgical Complex (AMMC)	Gold	Uzbekistan
CID001076	AMG Brasil	Tantalum	Brazil
CID000058	AngloGold Ashanti Corrego do Sitio Mineracao	Gold	Brazil
CID000920	Asahi Refining USA Inc.	Gold	United States Of America
CID002502	Asia Tungsten Products Vietnam Ltd.	Tungsten	Viet Nam
CID002850	AU Traders and Refiners	Gold	South Africa
CID002773	Aurubis Beerse	Tin	Belgium
CID000185	CCR Refinery - Glencore Canada Corporation	Gold	Canada
CID000258	Chongyi Zhangyuan Tungsten Co., Ltd.	Tungsten	China
CID002504	D Block Metals, LLC	Tantalum	United States Of America
CID002561	Emirates Gold DMCC	Gold	United Arab Emirates
CID000460	F&X Electro-Materials Ltd.	Tantalum	China
CID002515	Fidelity Printers and Refiners Ltd.	Gold	Zimbabwe
CID002315	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	Tungsten	China
CID002558	Global Advanced Metals Aizu	Tantalum	Japan
CID002557	Global Advanced Metals Boyertown	Tantalum	United States Of America
CID000568	Global Tungsten & Powders LLC	Tungsten	United States Of America
CID000291	Guangdong Rising Rare Metals-EO Materials Ltd.	Tantalum	China
CID002541	H.C. Starck Tungsten GmbH	Tungsten	Germany
CID000694	Heimerle + Meule GmbH	Gold	Germany
CID000773	Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd.	Gold	China
CID002649	Hydrometallurg, JSC	Tungsten	Russian Federation
CID000814	Istanbul Gold Refinery	Gold	Turkey
CID002551	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	Tungsten	China
CID002317	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	Tungsten	China
CID000914	JiuJiang JinXin Nonferrous Metals Co., Ltd.	Tantalum	China
CID000917	Jiujiang Tanbre Co., Ltd.	Tantalum	China
CID002506	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	Tantalum	China
CID003497	K.A. Rasmussen	Gold	Norway
CID002539	KEMET de Mexico	Tantalum	Mexico
CID000966	Kennametal Fallon	Tungsten	United States Of America
CID003463	Kundan Care Products Ltd.	Gold	India
CID002762	L'Orfebre S.A.	Gold	Andorra
CID003387	Luna Smelter, Ltd.	Tin	Rwanda
CID001105	Malaysia Smelting Corporation (MSC)	Tin	Malaysia
CID002548	Materion Newton Inc.	Tantalum	United States Of America

Smelter ID	Smelter Name	Metal	Smelter Country
CID001149	Metallor Technologies (Hong Kong) Ltd.	Gold	China
CID001153	Metallor Technologies S.A.	Gold	Switzerland
CID004065	Mining Minerals Resources SARL	Tin	Congo, Democratic Republic Of The
CID001188	Mitsubishi Materials Corporation	Gold	Japan
CID001192	Mitsui Mining and Smelting Co., Ltd.	Tantalum	Japan
CID001352	MKS PAMP SA	Gold	Switzerland
CID002509	MMTC-PAMP India Pvt., Ltd.	Gold	India
CID002573	Nghe Tinh Non-Ferrous Metals Joint Stock Company	Tin	Viet Nam
CID001259	Nihon Material Co., Ltd.	Gold	Japan
CID001277	Ningxia Orient Tantalum Industry Co., Ltd.	Tantalum	China
CID001200	NPM Silmet AS	Tantalum	Estonia
CID001419	PT Bangka Tin Industry	Tin	Indonesia
CID003324	QG Refining, LLC	Gold	United States Of America
CID001512	Rand Refinery (Pty) Ltd.	Gold	South Africa
CID002706	Resind Industria e Comercio Ltda.	Tin	Brazil
CID002973	Safimet S.p.A	Gold	Italy
CID001555	Samduck Precious Metals	Gold	Korea, Republic Of
CID001916	Shandong Gold Smelting Co., Ltd.	Gold	China
CID003383	Sovereign Metals	Gold	India
CID003153	State Research Institute Center for Physical Sciences and Technology	Gold	Lithuania
CID002567	Sudan Gold Refinery	Gold	Sudan
CID002756	Super Ligas	Tin	Brazil
CID002544	TANIOBIS Co., Ltd.	Tantalum	Thailand
CID002545	TANIOBIS GmbH	Tantalum	Germany
CID002549	TANIOBIS Japan Co., Ltd.	Tantalum	Japan
CID002542	TANIOBIS Smelting GmbH & Co. KG	Tungsten	Germany
CID002550	TANIOBIS Smelting GmbH & Co. KG	Tantalum	Germany
CID001891	Telex Metals	Tantalum	United States Of America
CID001898	Thaisarco	Tin	Thailand
CID001969	Ulba Metallurgical Plant JSC	Tantalum	Kazakhstan
CID002003	Valcambi S.A.	Gold	Switzerland
CID002015	VQB Mineral and Trading Group JSC	Tin	Viet Nam
CID002036	White Solder Metalurgia e Mineracao Ltda.	Tin	Brazil
CID002044	Wolfram Bergbau und Hutten AG	Tungsten	Austria
CID002320	Xiamen Tungsten (H.C.) Co., Ltd.	Tungsten	China
CID002082	Xiamen Tungsten Co., Ltd.	Tungsten	China
CID000616	XIMEI RESOURCES (GUANGDONG) LIMITED	Tantalum	China
CID002129	Yokohama Metal Co., Ltd.	Gold	Japan
CID000197	Yunnan Copper Industry Co., Ltd.	Gold	China

\* During our 2024 due diligence, eleven suppliers initially indicated potential sourcing from CID003185 - African Gold Refinery (“AGR”), a gold smelter operating in a Covered Country. To ascertain the presence of AGR-sourced



material in our supply chain, Calix promptly requested product-specific CMRTs from all eleven suppliers, utilizing multiple email reminders and direct phone calls to expedite responses. As of the filing date, nine of these suppliers have confirmed that AGR-sourced material was not supplied for integration into Calix's products in 2024.

One of the remaining two suppliers has confirmed that during at least a portion of 2024, 3TG sourced from AGR was likely integrated into at least one component within some of Calix's access products. Calix has determined that no further mitigation is required with respect to this upstream supplier, as our manufacturing partner who utilized this supplier has since discontinued its relationship and holds no remaining inventory or open orders. We are currently awaiting a response from the final supplier. In the event this supplier confirms 2024 components included AGR-sourced material, we intend to implement an action plan to remove such material from our supply chain, with an anticipated implementation timeframe of 30 days from confirmation.

Calix maintains a firm commitment to compliance with all applicable sanctions laws. While AGR was listed as an eligible gold refiner in the RMI facility database in 2024, Calix acknowledges its removal from the RMI RMAP Conformant list following the U.S. Department of Treasury's Office of Foreign Assets Control designation of AGR as a Specially Designated National on March 17, 2022. As a downstream user of 3TG, Calix did not source directly from AGR in 2024, and has not identified any direct transactions or contractual relationships with AGR. To date, only the one supplier identified above has confirmed the use of AGR-sourced material in a Calix product or component. Calix continues to collaborate with its supply base to ensure adherence to all applicable sanctions laws.