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

Form SD

Specialized Disclosure Report

LABCORP HOLDINGS INC.

(Exact name of registrant as specified in its charter)

Delaware
(State or other jurisdiction of
incorporation or organization)

1-11353
(Commission
File Number)

99-2588107
(I.R.S. Employer
Identification No.)

**358 South Main Street,
Burlington, North Carolina**
(Address of principal executive offices)

27215
(Zip Code)

Tracy M. Strong, Senior Vice President, Chief Compliance Officer and Chief Privacy Officer, 336-436-7147
(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, 2023.

Section 1 – Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

Conflict Minerals Disclosure

This Form SD of Labcorp Holdings Inc. and its consolidated subsidiaries (the “Company”) is filed pursuant to Rule 13p-1 under the Securities Exchange Act of 1934, as amended (the “Rule”), for the reporting period from January 1, 2023 to December 31, 2023.

The Rule requires disclosure of certain information when a company manufactures, or contracts to manufacture, products for which minerals specified in the Rule are necessary to the functionality or production of those products. The specified minerals are cassiterite, columbite-tantalite, wolframite and gold, including their derivatives, which are limited to tin, tantalum and tungsten (“3TG”). The “Covered Countries” for the 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 determined that in the period beginning January 1, 2023 through December 31, 2023, the Company manufactured, or contracted to manufacture, drug testing cards, male fertility kits, and test system servers for which 3TG are necessary to the functionality or production of the product. The drug testing cards use a derivative of gold, the male fertility kits include a centrifuge device that uses solder containing trace amounts of tin, and the test system servers contain a 3TG mineral. As a result of this determination, the Company conducted a good faith reasonable country of origin inquiry (the “RCOI”) to determine whether the 3TG found in the products originated in the Covered Countries or are from recycled or scrap sources.

The elements of the Company’s RCOI were: the identification of the suppliers of the 3TG contained in the product; data collection; and the assessment to determine whether further due diligence was required.

- *Identification of the suppliers:* The Company identified three direct suppliers of the 3TG contained in the Company’s products (the “Covered Suppliers”).
- *Data collection:* To collect information on the 3TG contained in the Company’s products, the Company prepared a questionnaire which requested information on the origin of the 3TG, including (i) whether the 3TG originated in the Covered Countries, (ii) whether the 3TG came from recycled or scrap sources and (iii) whether the 3TG was sourced from other upstream suppliers (the “Questionnaire”). The Company sent the Questionnaire to the direct suppliers and also requested that the direct suppliers send the Questionnaire to the upstream suppliers of the 3TG in its supply chain. The Company received responses from two of the three Covered Suppliers.
- *Assessment:* Responses from the Covered Suppliers were reviewed by the Company to assess the adequacy of such responses.

Based on the data collected by the Company through the RCOI, the Company determined that there is no reason to believe that the necessary gold used in its drug testing cards manufactured between January 1, 2023 and December 31, 2023 may have originated in Covered Countries. However, with respect to the male fertility kits, the Company determined that it does have reason to believe that the necessary tin may have originated in Covered Countries. Accordingly, the Company took additional due diligence measures, including sending inquiry letters to the Covered Supplier of tin and subsequently to an upstream supplier, to gain clarity on information relating to the source and compliance status of the tin used in the male fertility kits. The Covered Supplier provided a response to the Company’s inquiry. However, the Company has not been able to determine with reasonable certainty the country of origin of the tin used by its Covered Supplier, as the upstream supplier for the Covered Supplier did not respond to the Company’s request for additional information and a Conflict Minerals Reporting Template. Additionally, with respect to the testing system servers, the Company determined that it does have reason to believe that the necessary 3TG mineral may have originated in Covered Countries. Accordingly,

the Company took additional due diligence measures, including sending an inquiry letter to the Covered Supplier of the 3TG mineral, to gain clarity on information relating to the source and compliance status of the 3TG mineral used in the testing system servers. The Covered Supplier did not respond to the Company's request for additional information and a Conflict Minerals Reporting Template. The Company is not filing disclosure under Item 1.01(c) of Form SD in accordance with 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 on April 7, 2017.

This information is publicly available at: <https://ir.labcorp.com/static-files/cef3f01d-f4ec-4fb2-bf7b-24661ed3e0a8>.

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.

Date: May 30, 2024

LABCORP HOLDINGS INC.

By: /s/ Sandra van der Vaart
Sandra van der Vaart
Executive Vice President,
Chief Legal Officer and
Corporate Secretary