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

FORM SD
Specialized Disclosure Report

POSCO

(Exact name of registrant as specified in its charter)

The Republic of Korea

*(State or other jurisdiction
of incorporation)*

1-13368

(Commission File Number)

Not Applicable

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

**POSCO Center, 440 Teheran-ro,
Gangnam-gu**

Seoul, Republic of Korea

(Address of principal executive offices)

06194

(Zip Code)

Sohn, Kyle

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Seoul, Republic of Korea 06194

+82-2-3457-1386

*(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 and Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2019.

Section 1 – Conflict Minerals Disclosure

Item 1.01: Conflict Minerals Disclosure and Report

Rule 13p-1 under the Securities Exchange Act of 1934, as amended, generally provides that a company must file this specialized disclosure report if it manufactures or contracts to manufacture products for which one or more of the following minerals are necessary to the functionality or production of the company's products: cassiterite; columbite-tantalite (coltan); and wolframite; their derivatives tantalum, tin and tungsten; and gold (collectively, "3TGs"). These are considered "conflict minerals" under Rule 13p-1 regardless of their geographic origin and whether or not they fund armed conflict in the Democratic Republic of the Congo or its neighboring countries (the "Covered Countries").

All references to "we," "us" or "our" shall mean POSCO and, unless the context otherwise require, its consolidated subsidiaries.

Company and Product Overview

POSCO was established by the Korean government on April 1, 1968, under the Commercial Code, to manufacture and distribute steel products in the domestic and overseas markets. We are a fully integrated steel producer incorporated in Korea, and one of the largest steel producers in the world, based on annual crude steel production. We produced approximately 42.9 million tons of crude steel and stainless steel in 2019. We manufacture and sell a diversified line of steel products, including cold rolled and hot rolled products, stainless steel products, plates, wire rods and silicon steel sheets in the global market, and we strive to meet a broad range of customer needs from manufacturing industries that consume steel, including automotive, shipbuilding, home appliance, engineering and machinery industries. Information regarding our products is also publicly available on our website at <http://product.posco.com/homepage/product/eng/jsp/s91m0000001i.jsp>.

Iron ore and coal are the principal raw materials used in the steel industry, and 3TGs are generally used as supplementary materials in manufacturing steel products. We determined that certain of our products (collectively, the "Covered Products") contain some 3TGs that are necessary to the functionality or production of those products. Our tin plates contain tin to prevent oxidation and corrosion and certain of our stainless steel sheets contain tungsten to adjust tensile strength. We do not directly purchase 3TGs, nor do we have any direct relationship with any mines or smelters that process these minerals.

Results of Reasonable Country of Origin Inquiry

As specified under Rule 13p-1, we conducted in good faith a reasonable country of origin inquiry ("RCOI") that we believe was reasonably designed to determine whether any of the necessary 3TGs contained in our products manufactured in 2019 originated in the Covered Countries or were from recycled or scrap sources. In conducting the RCOI, we required our direct suppliers of materials for Covered Products to complete certifications concerning their manufacturing practices and the materials they supply to us. We also conducted a supply-chain survey with those suppliers using the Responsible Minerals Initiative's Conflict Minerals Reporting Template.

Based on our RCOI, we have no reason to believe that any of the 3TGs contained in the 2019 Covered Products originated in the Covered Countries or did not come from recycled or scrap sources. The information in this Form SD is also publicly available on our website at <http://www.posco.co.kr/homepage/docs/eng6/jsp/irinfo/irdata/s91b6000043l.jsp>

Our Internal Management System and Commitment

Conflict-Free Mineral Sourcing Policy

In accordance with our management philosophy, “Corporate Citizenship: Building a Better Future Together,” we pursue the values of consideration, coexistence and symbiosis. Based on such management philosophy, we established our conflict-free mineral sourcing policy. We support responsible in-region mineral sourcing from the Covered Countries and endeavor to operate our mineral sourcing process to ensure that we do not procure 3TGs originating from the Covered Countries that directly or indirectly finance or benefit armed groups or conflict in the region. We believe that our efforts will not undermine the local economies of the Covered Countries, and will encourage and promote other businesses to procure minerals more responsibly. Our policy on responsible mineral sourcing is available on our website at http://www.posco.co.kr/homepage/docs/eng6/jsp/irinfo/irdata/responsible_minerals.jsp and also on our corporate citizenship report at <http://corporatecitizenship.posco.com/citizen/eng/report/s919e3000307l.jsp>.

Internal Management System — Supply Chain Risk Identification and Assessment

We also established internal management systems and identified and assessed risks in our supply chain in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Information regarding our internal management system and the results of our assessment and analysis is publicly available on our website at http://www.posco.co.kr/homepage/docs/eng6/jsp/irinfo/irdata/responsible_minerals.jsp.

Our Commitment and Efforts

To strengthen our conflict-free sourcing process, we plan to continue to source all 3TGs in our supply chain from smelters and refiners that are participating in the Responsible Minerals Assurance Process, which is a program operated by the Responsible Minerals Initiative (“RMI”), a global non-governmental organization (“NGO”) in the area of responsible minerals sourcing. In line with our commitment, we joined RMI in April 2020 and plan to be an active participant in the NGO. We also plan to establish a consultative body among the affiliates of the POSCO Group to combine efforts in improving responsible mineral sourcing.

Item 1.02: Exhibits

Not applicable.

Section 2 – Exhibits

Item 2.01: Exhibits

Not applicable.

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.

POSCO
(Registrant)

By: /s/ Lim, Seung-Kyu

Date: May 28, 2020

Name: Lim, Seung-Kyu

Title: Executive Vice President