# **UNITED STATES** SECURITIES AND EXCHANGE COMMISSION

Washington, D.C. 20549

## Form SD

## **Specialized Disclosure Report**

## **DISH Network Corporation**

(Exact name of registrant as specified in its charter)

Nevada (State or Other Jurisdiction of Incorporation or Organization)

001-39144 (Commission File Number)

88-0336997 (I.R.S. Employer Identification No.)

### 9601 SOUTH MERIDIAN BLVD. **ENGLEWOOD, COLORADO**

(Address of Principal Executive Offices)

80112 (Zip Code)

**Timothy A. Messner Executive Vice President and General Counsel** 

(303) 723-1000

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

## DISH DBS Corporation

(Exact name of registrant as specified in its charter)

Colorado (State or Other Jurisdiction of

Incorporation or Organization)

333-31929 (Commission File Number)

84-1328967 (I.R.S. Employer Identification No.)

9601 SOUTH MERIDIAN BLVD. **ENGLEWOOD, COLORADO** 

(Address of Principal Executive Offices)

(Zip Code)

**Timothy A. Messner Executive Vice President and General Counsel** (303) 723-1000

(Name and telephone number, including area code, of 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:

 $\square$ Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2021.

#### EXPLANATORY NOTE

DISH Network Corporation ("DISH") and its subsidiary, DISH DBS Corporation ("DBS"), each has prepared this Specialized Disclosure Report on Form SD ("Form SD") pursuant to Rule 13p-1 (the "Rule") promulgated under the Securities Exchange Act of 1934, as amended (the "Exchange Act"), for the reporting period of January 1 to December 31, 2021. Unless the context indicates otherwise, any reference in this Form SD to the "Company," "we," "us" and "our" refer to DISH, DBS and their respective subsidiaries through December 31, 2021. Each of DISH and DBS is filing this Form SD and the attached Conflict Minerals Report separately and on its own behalf.

#### SECTION 1—CONFLICT MINERALS DISCLOSURE

#### ITEM 1.01. Conflict Minerals Disclosure and Report

#### Introduction

The Rule requires disclosure of certain information when a registrant manufactures, or contracts to manufacture, products whose manufacture was completed during the reporting period that contain certain minerals that are necessary to the functionality or production of such products (the "Covered Products"). The specified minerals are gold, columbite-tantalite (coltan), cassiterite and wolframite, including their derivatives, which are limited to tantalum, tin and tungsten (collectively, the "Conflict Minerals"). For the Covered Products, the registrant must conduct in good faith a reasonable country of origin inquiry designed to determine whether any of the Conflict Minerals originated in the Democratic Republic of the Congo or certain adjoining countries (each, a "Covered Country" and collectively, the "Covered Countries"). If, based on such inquiry, a registrant knows or has reason to believe that any of the Conflict Minerals originated or may have originated in a Covered Country and that such Conflict Minerals are not or may not be solely from recycled or scrap sources, the registrant must conduct due diligence with respect to the source and chain of custody of the Conflict Minerals to determine if they directly or indirectly finance or benefit armed groups in the Covered Countries.

#### **Conclusion Based on Reasonable Country of Origin Inquiry**

In accordance with the Rule, for the reporting period of January 1 to December 31, 2021, the Company:

- Determined that the Company manufactured, or contracted to manufacture, Covered Products.
- Conducted a good faith reasonable country of origin inquiry which was reasonably designed to determine whether any of the Conflict Minerals in our Covered Products originated in the Covered Countries and, if so, whether any of such Conflict Minerals may be from recycled or scrap sources. Based on that inquiry, the Company has reason to believe that some of the Conflict Minerals in our Covered Products may have originated in one or more of the Covered Countries and that such Conflict Minerals may not be from recycled or scrap sources.
- Conducted due diligence with respect to the source and chain of custody of such Conflict Minerals.

Based on the information obtained through our reasonable country of origin inquiry and our due diligence efforts, which significantly overlap, the Company has reasonably determined that countries of origin of the Conflict Minerals in the Covered Products, to the extent known, included Rwanda and Uganda.

#### **Conflict Minerals Disclosure**

Based on the results of the procedures described above, the Company has filed this Form SD and the attached Conflict Minerals Report. A copy of the Company's Conflict Minerals Report is filed as Exhibit 1.01 to this Form SD, and is publicly available on the Company's website at\_http://ir.dish.com/financial-information/sec-filings. Unless otherwise stated in this Form SD and the Conflict Minerals Report filed as Exhibit 1.01 hereto, any documents, third-party materials or references to websites, including the Company's, are not incorporated by reference in, or considered to be a part of, this Form SD and the attached Conflict Minerals Report.

#### **Forward-Looking Statements**

This Form SD and the attached Conflict Minerals Report contain "forward-looking statements" within the meaning of the Private Securities Litigation Reform Act of 1995, Section 27A of the Securities Act of 1933, as amended, and Section 21E of the Exchange Act, including but not limited to statements about our estimates, expectations, plans, objectives, strategies, and financial condition,

expected impact of regulatory developments and legal proceedings, opportunities in our industries and businesses and other trends and projections for the future. All statements, other than statements of historical facts, may be forward-looking statements. Forward-looking statements may also be identified by words such as "anticipate," "intend," "plan," "goal," "seek," "believe," "estimate," "expect," "predict," "continue," "future," "will," "would," "could," "can," "may" and similar expressions that convey uncertainty of future events or outcomes and the negatives of those terms. These forward-looking statements are based on information available to us as of the date of this Form SD and the attached Conflict Minerals Report and represent management's current views and assumptions about future events. Forward-looking statements are not guarantees of future performance, actions, events or results and involve potential known and unknown risks, uncertainties and other factors, many of which may be beyond our control and may pose a risk to our operating and financial condition. Accordingly, actual performance, events or results could differ materially from those expressed or implied in the forward-looking statements due to a number of factors. Important factors that could cause actual outcomes to differ materially from those contained in any forward-looking statement include those described in DISH's and DBS's respective reports, including DISH's and DBS's respective annual reports on Form 10-K for the fiscal year ended December 31, 2021, DISH's and DBS's respective quarterly reports on Form 10-Q and other documents that each of DISH and DBS files with or furnishes to the Securities and Exchange Commission from time to time. You should not put undue reliance on any forward-looking statements. Unless we are required to do so under U.S. federal securities laws or other applicable laws, we do not intend to update or revise any forward-looking statements. All cautionary statements made herein should be read as being applicable to all forward-looking statements wherever they appear. Investors should consider the risks and uncertainties described herein and should not place undue reliance on any forward-looking statements, which speak only as of the date hereof. We do not undertake, and specifically disclaim, any obligation to publicly release the results or any revisions that may be made to any forward-looking statements, whether as a result of new information, future events or otherwise, except as required by law.

## ITEM 1.02. Exhibit

As specified in Section 2, Item 2.01 of this Form SD, the Company is hereby filing our <u>Conflict Minerals Report as Exhibit 1.01 to this</u> Form SD.

## SECTION 2—EXHIBITS

## ITEM 2.01. Exhibits

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

Exhibit No. Description Conflict Minerals Report of DISH Network Corporation and DISH DBS Corporation for the reporting period 1.01 January 1 to December 31, 2021.

## SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, each registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

## DISH NETWORK CORPORATION

#### DISH DBS CORPORATION

By:

May 27, 2022

/s/ Timothy A. Messner Timothy A. Messner Executive Vice President and General Counsel

#### DISH NETWORK CORPORATION DISH DBS CORPORATION

#### **Conflict Minerals Report**

#### For the reporting period from January 1 to December 31, 2021

#### **Introduction and Background**

This Conflict Minerals Report (the "Report") of DISH Network Corporation ("DISH") and DISH DBS Corporation ("DBS" and, together with DISH and the respective subsidiaries of DISH and DBS through December 31, 2021, the "Company," "we," "our" and/or "us") has been prepared pursuant to Rule 13p-1 (the "Rule") promulgated under the Securities Exchange Act of 1934, as amended, for the reporting period from January 1 to December 31, 2021. The Rule requires disclosure of certain information when a company manufactures or contracts to manufacture products and 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 (collectively, the "Conflict Minerals") that originated in the Democratic Republic of the Congo ("DRC") and certain adjoining countries (collectively with the DRC, the "Covered Countries").

Pursuant to the Rule, the Company has concluded, in good faith, that during the reporting period from January 1 to December 31, 2021:

- the Company manufactured, or contracted to manufacture, products whose manufacture was completed in calendar year 2021 as to which Conflict Minerals are necessary to the functionality or production of those products (our "Covered Products"); and
- based on its good faith reasonable country of origin inquiry ("RCOI") regarding the Conflict Minerals in our Covered Products, the Company had reason to believe that certain of the Conflict Minerals necessary to the functionality or production of our Covered Products may have originated in one or more of the Covered Countries and that such Conflict Minerals may not be from recycled or scrap sources.

Therefore, the Company performed due diligence on the source and chain of custody of such Conflict Minerals in our Covered Products. The Company is filing this Report with its Specialized Disclosure Report on Form SD (the "Form SD") to comply with the requirements of the Rule. This Report has not been subject to an independent private sector audit.

## PART I. COMPANY OVERVIEW AND DESCRIPTION OF PRODUCTS COVERED BY THIS REPORT

#### **Description of Products**

During the reporting period, we engaged in the provision of pay-tv services in the United States of America. We operate through two primary business segments, Pay-TV and Wireless. The Pay-TV segment is offered under the DISH<sup>®</sup> brand and Sling<sup>®</sup> brand. Our Wireless business segment consists of two business units, Retail Wireless and 5G Network Deployment. This Report relates to our Covered Products under our Pay-TV business segment, which consist of digital set-top boxes and related components sold to international third-party providers of satellite pay-tv services and streaming media devices.

Certain of our Covered Products were designed, developed, engineered, manufactured, assembled and/or distributed by us; however, we also outsourced a significant portion of these functions to third parties. We worked with third-party vendors for the development and manufacture of components that are integrated into our Covered Products. We developed dual sourcing capabilities for critical parts when practical and we evaluated outsourced subcontract vendors on a periodic basis.

#### PART II. DESIGN OF OUR DUE DILIGENCE MEASURES

We designed our due diligence measures based on the five-step framework laid out by the Organization for Economic Cooperation and Development in its OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition (2016), including the related supplements on gold, tin, tantalum and tungsten (collectively, the "OECD Guidance"). Summarized below are the components of our due diligence measures as they relate to the five-step framework from the OECD Guidance.

#### Establish Strong Company Management Systems for Conflict Minerals Supply Chain Due Diligence

#### Designate Internal Corporate Team

The Company has an internal team, composed of senior members of the Company's supply chain and procurement operations and the legal department, which evaluates the Company's applicable supply chain processes and sourcing procedures and designs and supports the Company's due diligence efforts. The team meets periodically to develop and refine a due diligence process that:

- is consistent with the OECD Guidance,
- conforms to the requirements of the Rule, and
- is appropriate given the structure and operations of the Company's supply chain departments.

Each existing and new supplier and manufacturer (collectively referred to as "suppliers") is assigned to a specific employee within the supply chain department who reports to a senior supply chain manager. A senior supply chain manager disseminates all necessary information and documentation to each employee in the supply chain department responsible for interfacing directly with suppliers.

#### Commit to a Supply Chain Policy for Minerals from Conflict-Affected and High-Risk Areas

The Company maintains a policy relating to Conflict Minerals (the "Policy") stating that suppliers shall:

- have a policy to reasonably assure that the Conflict Minerals in the products they manufacture for or supply to the Company do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Covered Countries;
- exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to the Company upon the Company's request; and
- be prepared to assist the Company in meeting the Conflict Minerals reporting requirements under the Rule, as well as other national or international mineral reporting regimes that may arise in the future.

The Policy is incorporated into the Company's supplier code of conduct, which is available to our suppliers on our websites. All suppliers of the Company during the reporting period were obligated to comply with the supplier code of conduct.

#### Establish a System of Controls and Transparency over the Conflict Minerals Supply Chain

The Company employs a system of controls to promote transparency over our Conflict Minerals supply chain by utilizing the Conflict Minerals Reporting Template ("Conflict Minerals Reporting Template"), which is a supply chain survey designed to facilitate the transfer of information through the supply chain to identify the smelters and refiners that process the necessary Conflict Minerals in our Covered Products. The Conflict Minerals Reporting Template was developed by the Responsible Minerals Initiative ("RMI"), formerly the Conflict-Free Sourcing Initiative, a Responsible Business Alliance and Global e-Sustainability Initiative. The Company maintains an automated database of the completed Conflict Minerals Reporting Templates submitted to the Company by our suppliers (the "Conflict Minerals Response Database"), which helps us process

and analyze the information provided by our suppliers. Once in the Conflict Minerals Response Database, all completed Conflict Mineral Reporting Templates received from suppliers are stored electronically in a central location accessible to authorized employees involved in the due diligence process and are retained in accordance with the Company's document retention guidelines.

The Company is a member of the RMI, an organization committed to the responsible sourcing of Conflict Minerals that currently has over 400 participating companies and associations from around the world. As a member, the Company has access to a variety of tools and resources to better assess Conflict Minerals in our supply chain, including the Responsible Minerals Assurance Process ("RMAP"), formerly the Conflict-Free Smelter Program, an audit program designed to validate smelters' and refiners' sourcing practices.

#### Strengthen the Company's Engagement with Suppliers

We inform our suppliers of our Policy, our due diligence consistent with OECD Guidance and our compliance with the Rule. Moreover, the Company requires that suppliers expressly support the supply chain due diligence process employed by the Company and detailed in its code of conduct.

#### Establish a Company-Level Grievance Mechanism

The Company maintains an open reporting system through which employees and third parties may report concerns about potential or actual violations of the Policy. Concerns may be reported anonymously or for attribution through several channels, including through an employee's immediate manager or the Company's legal department.

#### Identify and Assess the Risks in the Company's Supply Chain

The Company does not purchase Conflict Minerals directly from mines, smelters or refiners and does not have a direct relationship with any mines, smelters or refiners. The Company's supply chain with respect to our Covered Products is complex, and there are many third parties in the supply chain between the ultimate manufacturer of our Covered Products and the original sources of the Conflict Minerals. As a result, the Company designed its due diligence to conform to the requirements of the Rule and the OECD Guidance as applicable for downstream companies. Because the Company believes that the smelters and refiners of the Conflict Minerals are best situated to identify the sources of Conflict Minerals, the Company relies on its communications with suppliers to identify the applicable smelters and refiners of Conflict Minerals in the Company performs the following measures to identify Conflict Minerals in our Covered Products.

### Identify Company Suppliers

The Company identifies our first-tier suppliers by generating reports from the Company's applicable manufacturing and procurement systems of all manufacturers who made, and all vendors who supplied components or products, for our Covered Products. For components delivered to the Company by distributors, the Company adds the distributors to the supplier list. Senior managers in the supply chain organization review and finalize the supplier list (the "Supplier List") to create a list that includes all relevant suppliers for purposes of the Rule.

#### Request Conflict Minerals Reporting Templates from Suppliers

The Company uses good faith efforts to identify from the Conflict Minerals Reporting Templates the smelters and refiners used by our suppliers on the Supplier List. Annually, the Company sends a letter and the Conflict Minerals Reporting Template to the suppliers on the Supplier List. The letter (i) reiterates the requirements of the Rule and its applicability to the Company, (ii) requests that each supplier complete the Conflict Minerals Reporting Template for all Covered Products supplied to the Company for the reporting period, and (iii) encourages suppliers to use smelters and refiners which appear on the RMAP's Conformant Smelter List (as described below). The Company contacts suppliers that do not respond to the Company's request by a specified date and suppliers that submit incomplete or inaccurate requests for follow-on discussions and to request additional information, as applicable.

As set forth in the Conflict Minerals Reporting Template and the OECD Guidance, suppliers make representations or provide information regarding, among other things, (i) the country of origin for the Conflict Minerals contained in components or products provided by the supplier to the Company, (ii) whether such Conflict Minerals directly or indirectly finance armed conflict in the Covered Countries, (iii) all smelters and refiners in the supplier's supply chain for such Conflict Minerals, (iv) whether such smelters and refiners have been validated in compliance with the RMAP, (v) whether such supplier uses the Conflict Minerals Reporting Template with its own suppliers to gather information, and (vi) whether the supplier has its owns conflict mineral policy that requires its direct suppliers to be conformant.

#### Analyze Surveys for RMAP Conformant and Active Smelters and Refiners

If correctly completed, each Conflict Minerals Reporting Template identifies the smelters and refiners within the applicable supplier's supply chain. The Company reviews the information in the completed Conflict Minerals Reporting Templates against the RMAP's Conformant Smelter List to determine whether the smelters or refiners associated with the applicable supplier qualify as "conformant" or "active". We rely upon third party audits of smelters and refiners as part of the RMI's RMAP, an audit program designed to validate smelters' and refiners' sourcing practices as described below. Smelters and refiners receive a "conformant" designation from RMI if (i) the audited smelter or refiner adheres to the RMAP's assessment protocols by disclosing to independent auditors the identities and locations of the mines from which it sources Conflict Minerals and (ii) the independent auditor verifies separately that the smelter's or refiner's Conflict Minerals policies of all smelters and refiners and refiners deemed "conformant" with the RMAP's assessment protocols. Smelters and refiners labeled as "RMAP Active" have committed to undergo a RMAP audit but have not yet completed their audit or are participating in other cross-recognized certification programs. "RMAP Active" smelters and refiners may be at various stages of the audit cycle, anywhere from completion of the necessary documents to scheduling the audit date to enacting corrective actions in the post-audit phase, but may not retain their "active" status if they are unresponsive to requests for re-audit or corrective action past a certain time.

The Company also uses good faith efforts to identify the country of origin information from the smelters and refiners provided by our suppliers on the Supply List through the Conflict Minerals Reporting Template.

#### Design and Implement Strategies to Respond to Identified Risks

### Participate in Existing Industry Conflict Minerals Initiatives

In light of the complexity of the Company's and our suppliers' supply chains, the Company is currently unable to assess adequately the risk that Conflict Minerals exist in our Covered Products or whether they finance armed conflict in the DRC. However, the Company continues to engage with suppliers to obtain current, accurate and complete information about our supply chains through the use of the Conflict Minerals Reporting Template and to promote "conformant" supply chains through our RMI membership.

#### Report Findings to Designated Senior Management

The members of the Company's internal Conflicts Minerals team (consisting of senior members of the Company's supply chain and procurement operations and the legal department) provide progress reports summarizing the findings from our due diligence efforts to the senior management of the Company.

#### **Independent Third-Party Audits of Smelters/Refiners**

Due to its downstream position in the supply chain, the Company does not have a direct relationship with smelters and refiners. Further, the complexity of our supply chain and the many third parties involved between the ultimate manufacturer of our Covered Products and the original sources of the Conflict Minerals hinders the Company's ability to perform direct audits of smelters and refiners in our supply chain. Instead, we rely upon third party audits of smelters and refiners as part of the RMI's RMAP, an audit program designed to validate smelters' and refiners' sourcing practices. The RMAP's audit process is discussed above in more detail in "Identify and Assess the Risks in the Company's Supply Chain."

Additionally, through our RMI membership, we support the further development and implementation of due diligence practices and tools, such as the Conflict Minerals Reporting Template and the RMAP.

#### **Report Annually on Supply Chain Due Diligence**

The Company has filed with the Securities and Exchange Commission its Form SD, which includes this Report as Exhibit 1.01, for the reporting period of January 1 to December 31, 2021. In accordance with the OECD Guidance and the Rule, this Report is available on our website at http://ir.dish.com/financial-information/sec-filings.

#### PART III. DESCRIPTION OF DUE DILIGENCE MEASURES PERFORMED; RESULTS OF OUR DUE DILIGENCE MEASURES

### Inherent Limitations on Due Diligence Measures

As a downstream purchaser of products which contain Conflict Minerals, our due diligence measures can provide only reasonable, not absolute, assurance regarding the source and chain of custody of Conflict Minerals. Our due diligence processes are based on the necessity of seeking data from our direct suppliers and those suppliers seeking similar information within their supply chains to identify the original sources of Conflict Minerals. We also rely, to a large extent, on information collected and provided by responsible mineral sourcing validation programs. Such sources of information may yield inaccurate or incomplete information and may be subject to fraud.

Another complicating factor is the unavailability of country of origin and chain of custody information from our suppliers on a continuous, real-time basis. The supply chain of commodities such as Conflict Minerals is a multi-step process operating more or less on a daily basis, with ore being delivered to smelters and refiners, with smelters and refiners smelting or refining ores into metal containing derivatives such as ingots, with the derivatives being shipped, sold and stored in numerous market locations around the world and with distributors and purchasers holding varying amounts of the derivatives in inventory for use. Since we do not have direct contractual relationships with smelters and refiners, we rely on our direct suppliers and the entire supply chain to gather and provide specific information about the date when the ore is smelted into a derivative and later shipped, stored, sold and first entered the stream of commerce.

### **Compilation and Analysis of Responses**

For the reporting period of January 1 to December 31, 2021, the Company identified 15 relevant suppliers. In the first quarter of 2021, the Company sent each such supplier on the Supplier List a letter requesting completion of the Conflict Minerals Reporting Template. The Company followed up with suppliers that did not respond to the Company's request by the specified date or that submitted incomplete or inaccurate requests.

The Company received responses from 15, or 100%, of the solicited suppliers, including completed Conflict Minerals Reporting Templates from 15, or 100%, of the solicited suppliers. Through the use of the Conflict Minerals Response Database and access to the RMAP information, we were able to identify the smelters and refiners we believe were used to process the Conflict Minerals contained in our Covered Products as set forth in Annex 1 attached to this Report, as well as to identify which of those smelters and refiners were "RMAP Conformant" or "RMAP Active." After correction, review, and removal of duplicate or alternate names, and elimination of entities we determined were not actually smelters or refiners, and elimination of entities for which we were unable to determine if they were a relevant smelter or refiner, we identified 362 unique smelters.

Based on the information that was provided by the Company's suppliers and information otherwise obtained by the Company during the due diligence process, the following table sets forth the number of "RMAP Conformant" and "RMAP Active" smelters and refiners in our supply chain as of the end of 2021 for each of the Conflict Minerals used in our Covered Products:

	<b>RMAP Conformant</b>	<b>RMAP</b> Active
Conflict Mineral	<b>Smelters or Refiners</b>	Smelters or Refiners
Gold	101	5
Tantalum	39	0
Tin	54	9
Tungsten	42	2

As discussed in "Part II. Design of Our Due Diligence Analysis" above, the Company relies on the completed Conflict Minerals Reporting Templates received from our suppliers as our main source of documentation supporting the representations made by such suppliers regarding the source and chain of custody of relevant Conflict Minerals in our Covered Products during the reporting period. The smelters and refiners identified in Annex 1 to this Report were identified by our suppliers and the Company cannot be certain that these smelters and refiners were in fact in the Company's supply chain.

#### Country of Origin of the Conflict Minerals in the Covered Products

Based on the information that was provided by the Company's suppliers and information otherwise obtained by the Company during the due diligence process, the Company does not have sufficient information, with respect to our Covered Products, to determine the country of origin of all of the Conflict Minerals in all such Covered Products. However, based on the information obtained through our reasonable country of origin inquiry and our due diligence efforts (comprised of the Conflict Minerals Reporting Templates the Company received and information otherwise obtained by the Company during the due diligence process regarding smelters and refiners for the suppliers who submitted such templates), the Company has reasonably determined that countries of origin of the Conflict Minerals in the Covered Products, to the extent known, included Rwanda and Uganda.

#### Facilities Used to Process the Conflict Minerals in the Covered Products

Based on the information that was provided by the Company's suppliers and information otherwise obtained through the due diligence process, the Company was unable to identify with certainty all of the facilities used to process the Conflict Minerals in our Covered Products. However, based on the information that was provided by the Company's suppliers and information otherwise obtained through the due diligence process, to the extent reasonably determinable by the Company, the facilities that were used to process the Conflict Minerals contained in our Covered Products are believed to include the smelters and refiners listed in Annex 1 attached to this Report. The smelters and refiners that the Company has been able to determine as "RMAP Conformant" and "RMAP Active" are identified in Annex 1. However, as discussed above, the smelters and refiners identified in Annex 1 to this Report were identified by our suppliers and the Company cannot be certain that these smelters and refiners were in fact in the Company's supply chain.

#### PART IV. IMPLEMENTATION OF STRATEGIES TO RESPOND TO IDENTIFIED RISKS AND FUTURE STEPS

Due diligence is an ongoing, proactive and reactive process. The Company plans to continue engaging with our suppliers to obtain current, accurate and complete information about the supply chain and to continue our due diligence efforts. Further, reporting on Conflict Minerals is a contractual requirement for our suppliers through our supplier code of conduct. The Company has used our RMI membership to gain a better understanding of the smelters and refiners in our supply chain and their RMAP compliance status, and we intend to continue to take advantage of the resources available to RMI members with regard to conformant sourcing.

### Annex 1

## CURRENTLY KNOWN SMELTER AND REFINERY LIST

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Metal	Smelter Name	Country of Smelter Facility
GOLD	EMIRATES GOLD DMCC	UNITED ARAB EMIRATES*
GOLD	FIDELITY PRINTERS AND REFINERS LTD.	ZIMBABWE
GOLD	FUJAIRAH GOLD FZC	UNITED ARAB EMIRATES
GOLD	GEIB REFINING CORPORATION	UNITED STATES OF AMERICA*
GOLD	GGC GUJRAT GOLD CENTRE PVT. LTD.	INDIA* *
GOLD	GOLD COAST REFINERY	GHANA
GOLD	GOLD REFINERY OF ZIJIN MINING GROUP CO., LTD.	CHINA*
GOLD	GREAT WALL PRECIOUS METALS CO., LTD. OF CBPM	CHINA
GOLD	GUANGDONG JINDING GOLD LIMITED	CHINA
GOLD	GUODA SAFINA HIGH-TECH ENVIRONMENTAL REFINERY CO.	
	LTD.	
GOLD	HANGZHOU FUCHUNJIANG SMELTING CO., LTD.	CHINA
GOLD	HEIMERLE + MEULE GMBH	GERMANY*
GOLD	HERAEUS GERMANY GMBH CO. KG	GERMANY*
GOLD	HERAEUS METALS HONG KONG LTD.	CHINA*
GOLD	HUNAN CHENZHOU MINING CO., LTD.	CHINA
GOLD	HUNAN GUIYANG YINXING NONFERROUS SMELTING CO., LTI	
GOLD	HWASEONG CJ CO., LTD.	KOREA, REPUBLIC OF
GOLD	INDUSTRIAL REFINING COMPANY	BELGIUM
GOLD	INNER MONGOLIA QIANKUN GOLD AND SILVER REFINERY SHARE CO., LTD.	CHINA*
GOLD	INTERNATIONAL PRECIOUS METAL REFINERS	UNITED ARAB EMIRATES
GOLD	ISHIFUKU METAL INDUSTRY CO., LTD.	JAPAN*
GOLD	ISTANBUL GOLD REFINERY	TURKEY*
GOLD	ITALPREZIOSI	ITALY*
GOLD	JALAN & COMPANY	INDIA
GOLD	JAPAN MINT	JAPAN*
GOLD	JIANGXI COPPER CO., LTD.	CHINA*
GOLD	JSC EKATERINBURG NON-FERROUS METAL PROCESSING PLANT	RUSSIAN FEDERATION
GOLD	JSC NOVOSIBIRSK REFINERY	RUSSIAN FEDERATION
GOLD	JSC URALELECTROMED	RUSSIAN FEDERATION
GOLD	JX NIPPON MINING & METALS CO., LTD.	JAPAN*
GOLD	K.A. RASMUSSEN	NORWAY
GOLD	KALOTI PRECIOUS METALS	UNITED ARAB EMIRATES
GOLD	KAZAKHMYS SMELTING LLC	KAZAKHSTAN
GOLD	KAZZINC	KAZAKHSTAN*
GOLD	KENNECOTT UTAH COPPER LLC	<b>UNITED STATES OF AMERICA*</b>
GOLD	KGHM POLSKA MIEDZ SPOLKA AKCYJNA	POLAND*
GOLD	KOJIMA CHEMICALS CO., LTD.	JAPAN*
GOLD	KOREA ZINC CO., LTD.	KOREA, REPUBLIC OF*
GOLD	KUNDAN CARE PRODUCTS LTD.	INDIA
GOLD	KYRGYZALTYN JSC	KYRGYZSTAN
GOLD	KYSHTYM COPPER-ELECTROLYTIC PLANT ZAO	RUSSIAN FEDERATION
GOLD	L'AZURDE COMPANY FOR JEWELRY	SAUDI ARABIA
GOLD	LINGBAO GOLD CO., LTD.	CHINA
GOLD	LINGBAO JINYUAN TONGHUI REFINERY CO., LTD.	CHINA
GOLD	L'ORFEBRE S.A.	ANDORRA*
GOLD	LS-NIKKO COPPER INC.	KOREA, REPUBLIC OF*
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Metal	Smelter Name	Country of Smelter Facility
GOLD	LT METAL LTD.	KOREA, REPUBLIC OF*
GOLD	LUOYANG ZIJIN YINHUI GOLD REFINERY CO., LTD.	CHINA
GOLD	MARSAM METALS	BRAZIL*
GOLD	MATERION	UNITED STATES OF AMERICA*
GOLD	MATSUDA SANGYO CO., LTD.	JAPAN*
GOLD	MD OVERSEAS	INDIA
GOLD	METAL CONCENTRATORS SA (PTY) LTD.	SOUTH AFRICA*
GOLD	METALLIX REFINING INC.	UNITED STATES OF AMERICA
GOLD	METALOR TECHNOLOGIES (HONG KONG) LTD.	CHINA*
GOLD	METALOR TECHNOLOGIES (SINGAPORE) PTE., LTD.	SINGAPORE*
GOLD	METALOR TECHNOLOGIES (SUZHOU) LTD.	CHINA*
GOLD	METALOR TECHNOLOGIES S.A.	SWITZERLAND*
GOLD	METALOR USA REFINING CORPORATION	UNITED STATES OF AMERICA*
GOLD	METALURGICA MET-MEX PENOLES S.A. DE C.V.	MEXICO*
GOLD	MITSUBISHI MATERIALS CORPORATION	JAPAN*
GOLD	MITSUI MINING AND SMELTING CO., LTD.	JAPAN*
GOLD	MMTC-PAMP INDIA PVT., LTD.	INDIA*
GOLD	MODELTECH SDN BHD	MALAYSIA
GOLD	MORRIS AND WATSON	NEW ZEALAND
GOLD	MOSCOW SPECIAL ALLOYS PROCESSING PLANT	RUSSIAN FEDERATION
GOLD	NADIR METAL RAFINERI SAN. VE TIC. A.S.	TURKEY*
GOLD	NAVOI MINING AND METALLURGICAL COMBINAT	UZBEKISTAN*
GOLD	NH RECYTECH COMPANY	KOREA, REPUBLIC OF*
GOLD	NIHON MATERIAL CO., LTD.	JAPAN*
GOLD	OGUSSA OSTERREICHISCHE GOLD- UND SILBER-	AUSTRIA*
	SCHEIDEANSTALT GMBH	
GOLD	OHURA PRECIOUS METAL INDUSTRY CO., LTD.	JAPAN*
GOLD	OJSC "THE GULIDOV KRASNOYARSK NON-FERROUS METALS	RUSSIAN FEDERATION
	PLANT" (OJSC KRASTSVETMET)	
GOLD	PAMP S.A.	SWITZERLAND*
GOLD	PEASE & CURREN	UNITED STATES OF AMERICA
GOLD	PENGLAI PENGGANG GOLD INDUSTRY CO., LTD.	CHINA
GOLD	PLANTA RECUPERADORA DE METALES SPA	CHILE*
GOLD	PRIOKSKY PLANT OF NON-FERROUS METALS	RUSSIAN FEDERATION
GOLD	PT ANEKA TAMBANG (PERSERO) TBK	INDONESIA*
GOLD	PX PRECINOX S.A.	SWITZERLAND*
GOLD	QG REFINING, LLC	UNITED STATES OF AMERICA
GOLD	RAND REFINERY (PTY) LTD.	SOUTH AFRICA*
GOLD GOLD	REFINERY OF SEEMINE GOLD CO., LTD.	CHINA
	REMONDIS PMR B.V.	NETHERLANDS*
GOLD	ROYAL CANADIAN MINT SAAMP	CANADA* FRANCE*
GOLD GOLD	SABIN METAL CORP.	
GOLD GOLD	SAFIMET S.P.A	UNITED STATES OF AMERICA ITALY*
GOLD	SAFIMET S.P.A SAFINA A.S.	CZECHIA*
GOLD GOLD	SAFINA A.S. SAI REFINERY	INDIA
GOLD	SAI REFINERT SAMDUCK PRECIOUS METALS	KOREA, REPUBLIC OF*
GOLD	SAMDOCK PRECIOUS METALS SAMWON METALS CORP.	KOREA, REPUBLIC OF
GOLD	SAMIWON METALS CORP. SANCUS ZFS (L'ORFEBRE, SA)	COLOMBIA* *
GOLD	SANCUS ZES (L'ORFEDRE, SA) SAXONIA EDELMETALLE GMBH	GERMANY*
JOLD		

Metal	Smelter Name	Country of Smelter Facility
GOLD	SELLEM INDUSTRIES LTD.	MAURITANIA
GOLD	SEMPSA JOYERIA PLATERIA S.A.	SPAIN*
GOLD	SHANDONG GOLD SMELTING CO., LTD.	CHINA*
GOLD	SHANDONG HUMON SMELTING CO., LTD.	CHINA
	SHANDONG TIANCHENG BIOLOGICAL GOLD INDUSTRIAL CO.,	
GOLD	LTD.	' CHINA
GOLD	SHANDONG ZHAOJIN GOLD & SILVER REFINERY CO., LTD.	CHINA*
GOLD	SHENZHEN ZHONGHENGLONG REAL INDUSTRY CO., LTD.	CHINA
GOLD	SHIRPUR GOLD REFINERY LTD.	INDIA
GOLD	SICHUAN TIANZE PRECIOUS METALS CO., LTD.	CHINA*
GOLD	SINGWAY TECHNOLOGY CO., LTD.	TAIWAN, PROVINCE OF CHINA*
	SOE SHYOLKOVSKY FACTORY OF SECONDARY PRECIOUS	
GOLD	METALS	RUSSIAN FEDERATION
GOLD	SOLAR APPLIED MATERIALS TECHNOLOGY CORP.	TAIWAN, PROVINCE OF CHINA*
GOLD	SOVEREIGN METALS	INDIA
	STATE RESEARCH INSTITUTE CENTER FOR PHYSICAL	
GOLD	SCIENCES AND TECHNOLOGY	LITHUANIA
GOLD	SUDAN GOLD REFINERY	SUDAN
GOLD	SUMITOMO METAL MINING CO., LTD.	JAPAN*
GOLD	SUNGEEL HIMETAL CO., LTD.	KOREA, REPUBLIC OF*
GOLD	T.C.A S.P.A	ITALY*
GOLD	TANAKA KIKINZOKU KOGYO K.K.	JAPAN*
GOLD	TOKURIKI HONTEN CO., LTD.	JAPAN*
GOLD	TONGLING NONFERROUS METALS GROUP CO., LTD.	CHINA
GOLD	TOO TAU-KEN-ALTYN	KAZAKHSTAN*
GOLD	TORECOM	KOREA, REPUBLIC OF*
GOLD	TSK PRETECH	KOREA, REPUBLIC OF
GOLD	UMICORE BRASIL LTDA.	BRAZIL
GOLD	UMICORE PRECIOUS METALS THAILAND	THAILAND*
GOLD	UMICORE S.A. BUSINESS UNIT PRECIOUS METALS REFINING	BELGIUM*
GOLD	UNITED PRECIOUS METAL REFINING, INC.	UNITED STATES OF AMERICA*
GOLD	VALCAMBI S.A.	SWITZERLAND*
GOLD	WESTERN AUSTRALIAN MINT (T/A THE PERTH MINT)	AUSTRALIA*
GOLD	WIELAND EDELMETALLE GMBH	GERMANY*
GOLD	YAMAKIN CO., LTD.	JAPAN*
GOLD	YOKOHAMA METAL CO., LTD.	JAPAN*
GOLD	YUNNAN COPPER INDUSTRY CO., LTD.	CHINA
GOLD	ZHONGYUAN GOLD SMELTER OF ZHONGJIN GOLD	CHINA*
GOLD	CORPORATION	CHINA
TANTALUM	AMG BRASIL	BRAZIL*
TANTALUM	ASAKA RIKEN CO., LTD.	JAPAN*
TANTALUM	CHANGSHA SOUTH TANTALUM NIOBIUM CO., LTD.	CHINA*
TANTALUM	CP METALS INC.	UNITED STATES OF AMERICA
TANTALUM	D BLOCK METALS, LLC	UNITED STATES OF AMERICA*
TANTALUM	EXOTECH INC.	UNITED STATES OF AMERICA*
TANTALUM	F&X ELECTRO-MATERIALS LTD.	CHINA*
TANTALUM	FIR METALS & RESOURCE LTD.	CHINA*
TANTALUM	GLOBAL ADVANCED METALS AIZU	JAPAN*
TANTALUM	GLOBAL ADVANCED METALS BOYERTOWN	UNITED STATES OF AMERICA*
TANTALUM	GUANGDONG RISING RARE METALS-EO MATERIALS LTD.	CHINA*
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Metal	Smelter Name	Country of Smelter Facility
TANTALUM	H.C. STARCK HERMSDORF GMBH	GERMANY*
TANTALUM	H.C. STARCK INC.	UNITED STATES OF AMERICA*
TANTALUM	HENGYANG KING XING LIFENG NEW MATERIALS CO., LTD.	CHINA*
TANTALUM	JIANGXI DINGHAI TANTALUM & NIOBIUM CO., LTD.	CHINA*
TANTALUM	JIANGXI TUOHONG NEW RAW MATERIAL	CHINA*
TANTALUM	JIUJIANG JINXIN NONFERROUS METALS CO., LTD.	CHINA*
TANTALUM	JUJIANG TANBRE CO., LTD.	CHINA*
TANTALUM	JIUJIANG ZHONGAO TANTALUM & NIOBIUM CO., LTD.	CHINA*
TANTALUM	KEMET BLUE POWDER	UNITED STATES OF AMERICA
TANTALUM	KEMET DE MEXICO	MEXICO*
IANIALOW	REMET DE MEXICO	NORTH MACEDONIA, REPUBLIC
TANTALUM	META MATERIALS	OF*
TANTALUM	METALLURGICAL PRODUCTS INDIA PVT., LTD.	INDIA*
TANTALUM	MINERACAO TABOCA S.A.	BRAZIL*
TANTALUM	MINERACAO TABOCA S.A.	BRAZIL*
TANTALUM	MITSUI MINING AND SMELTING CO., LTD.	JAPAN*
TANTALUM	NINGXIA ORIENT TANTALUM INDUSTRY CO., LTD.	CHINA*
TANTALUM	NPM SILMET AS	ESTONIA*
TANTALUM	QUANTUMCLEAN	UNITED STATES OF AMERICA*
TANTALUM	RESIND INDUSTRIA E COMERCIO LTDA.	BRAZIL*
TANTALUM	SOLIKAMSK MAGNESIUM WORKS OAO	RUSSIAN FEDERATION*
TANTALUM	TAKI CHEMICAL CO., LTD.	JAPAN*
TANTALUM	TANIOBIS CO., LTD.	THAILAND*
TANTALUM	TANIOBIS GMBH	GERMANY*
TANTALUM	TANIOBIS JAPAN CO., LTD.	JAPAN*
TANTALUM	TANIOBIS SMELTING GMBH & CO. KG	GERMANY*
TANTALUM	TELEX METALS	UNITED STATES OF AMERICA*
TANTALUM	ULBA METALLURGICAL PLANT JSC	KAZAKHSTAN*
TANTALUM	XIMEI RESOURCES (GUANGDONG) LIMITED	CHINA*
TANTALUM	XINXING HAORONG ELECTRONIC MATERIAL CO., LTD.	CHINA*
TANTALUM	YANLING JINCHENG TANTALUM & NIOBIUM CO., LTD.	CHINA*
TIN	ALPHA	UNITED STATES OF AMERICA*
TIN	AN VINH JOINT STOCK MINERAL PROCESSING COMPANY	VIET NAM
TIN	CHENZHOU YUNXIANG MINING AND METALLURGY CO., LTD.	CHINA*
TIN	CHIFENG DAJINGZI TIN INDUSTRY CO., LTD.	CHINA*
TIN	CHINA TIN GROUP CO., LTD.	CHINA*
TIN	CRM FUNDICAO DE METAIS E COMERCIO DE EQUIPAMENTOS	BRAZIL* *
	ELETRONICOS DO BRASIL LTDA	
TIN	CRM SYNERGIES	SPAIN*
TIN	CV AYI JAYA	INDONESIA
TIN	CV DUA SEKAWAN	INDONESIA
TIN	CV GITA PESONA	INDONESIA
TIN	CV UNITED SMELTING	INDONESIA
TIN	CV VENUS INTI PERKASA	INDONESIA* *
TIN	DONGGUAN CIEXPO ENVIRONMENTAL ENGINEERING CO., LTD.	CHINA
TIN	DOWA	JAPAN*
	ELECTRO-MECHANICAL FACILITY OF THE CAO BANG	
TIN	MINERALS & METALLURGY JOINT STOCK COMPANY	VIET NAM
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Metal	Smelter Name	Country of Smelter Facility
TIN	EM VINTO	BOLIVIA (PLURINATIONAL STATE
		OF)*
TIN	ESTANHO DE RONDONIA S.A.	BRAZIL*
TIN	FENIX METALS	POLAND*
TIN	GEJIU CITY FUXIANG INDUSTRY AND TRADE CO., LTD.	CHINA
TIN	GEJIU FENGMING METALLURGY CHEMICAL PLANT	CHINA
TIN	GEJIU KAI MENG INDUSTRY AND TRADE LLC	CHINA
TIN	GEJIU NON-FERROUS METAL PROCESSING CO., LTD.	CHINA*
TIN	GEJIU YUNXIN NONFERROUS ELECTROLYSIS CO., LTD.	CHINA*
TIN	GEJIU ZILI MINING AND METALLURGY CO., LTD.	CHINA*
TIN	GUANGDONG HANHE NON-FERROUS METAL CO., LTD.	CHINA*
TIN	GUANYANG GUIDA NONFERROUS METAL SMELTING PLANT	CHINA
TIN	HUICHANG HILL TIN INDUSTRY CO., LTD.	CHINA*
TIN	HUICHANG JINSHUNDA TIN CO., LTD.	CHINA
TIN	JIANGXI NEW NANSHAN TECHNOLOGY LTD.	CHINA*
TIN	LUNA SMELTER, LTD.	RWANDA*
TIN	MA'ANSHAN WEITAI TIN CO., LTD.	CHINA*
TIN	MAGNU'S MINERAIS METAIS E LIGAS LTDA.	BRAZIL*
TIN	MALAYSIA SMELTING CORPORATION (MSC)	MALAYSIA*
TIN	MELT METAIS E LIGAS S.A.	BRAZIL*
TIN	METALLIC RESOURCES, INC.	UNITED STATES OF AMERICA*
TIN	METALLO BELGIUM N.V.	BELGIUM*
TIN	METALLO SPAIN S.L.U.	SPAIN*
TIN	MINERACAO TABOCA S.A.	BRAZIL*
TIN	MINSUR	PERU*
TIN	MITSUBISHI MATERIALS CORPORATION	JAPAN*
TIN	MODELTECH SDN BHD	MALAYSIA
TIN	NGHE TINH NON-FERROUS METALS JOINT STOCK COMPANY	VIET NAM
TIN	NOVOSIBIRSK PROCESSING PLANT LTD.	RUSSIAN FEDERATION* *
TIN TIN	O.M. MANUFACTURING (THAILAND) CO., LTD.	THAILAND*
1 IIN	O.M. MANUFACTURING PHILIPPINES, INC.	PHILIPPINES*
TIN	OPERACIONES METALURGICAS S.A.	BOLIVIA (PLURINATIONAL STATE OF)*
TIN	PONGPIPAT COMPANY LIMITED	MYANMAR
TIN	PRECIOUS MINERALS AND SMELTING LIMITED	INDIA
TIN	PT ARIES KENCANA SEJAHTERA	INDONESIA* *
TIN	PT ARTHA CIPTA LANGGENG	INDONESIA*
TIN	PT ATD MAKMUR MANDIRI JAYA	INDONESIA*
TIN	PT BABEL INTI PERKASA	INDONESIA*
TIN	PT BABEL SURYA ALAM LESTARI	INDONESIA*
TIN	PT BANGKA PRIMA TIN	INDONESIA
TIN	PT BANGKA SERUMPUN	INDONESIA*
TIN	PT BANGKA TIN INDUSTRY	INDONESIA
TIN	PT BELITUNG INDUSTRI SEJAHTERA	INDONESIA
TIN	PT BUKIT TIMAH	INDONESIA* *
TIN	PT DS JAYA ABADI	INDONESIA
TIN	PT INTI STANIA PRIMA	INDONESIA
TIN	PT KARIMUN MINING	INDONESIA
TIN	PT KIJANG JAYA MANDIRI	INDONESIA
TIN	PT LAUTAN HARMONIS SEJAHTERA	INDONESIA
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Metal	Smelter Name	<b>Country of Smelter Facility</b>
TIN	PT MENARA CIPTA MULIA	INDONESIA*
TIN	PT MITRA STANIA PRIMA	INDONESIA*
TIN	PT MITRA SUKSES GLOBALINDO	INDONESIA* *
TIN	PT PANCA MEGA PERSADA	INDONESIA
TIN	PT PREMIUM TIN INDONESIA	INDONESIA
TIN	PT PRIMA TIMAH UTAMA	INDONESIA*
TIN	PT RAJAWALI RIMBA PERKASA	INDONESIA*
TIN	PT RAJEHAN ARIQ	INDONESIA*
TIN	PT REFINED BANGKA TIN	INDONESIA*
TIN	PT SARIWIGUNA BINASENTOSA	INDONESIA*
TIN	PT STANINDO INTI PERKASA	INDONESIA*
TIN	PT SUKSES INTI MAKMUR	INDONESIA* *
TIN	PT SUMBER JAYA INDAH	INDONESIA
TIN	PT TIMAH NUSANTARA	INDONESIA* *
TIN	PT TIMAH TBK KUNDUR	INDONESIA*
TIN	PT TIMAH TBK MENTOK	INDONESIA*
TIN	PT TININDO INTER NUSA	INDONESIA*
TIN	PT TOMMY UTAMA	INDONESIA
TIN	RESIND INDUSTRIA E COMERCIO LTDA.	BRAZIL*
TIN	RUI DA HUNG	TAIWAN, PROVINCE OF CHINA*
TIN	SOFT METAIS LTDA.	BRAZIL*
TIN	SUPER LIGAS	BRAZIL* *
TIN	THAI NGUYEN MINING AND METALLURGY CO., LTD.	VIET NAM*
TIN	THAI NGO I EN MINING AND METALLORG I CO., LID. THAISARCO	THAILAND*
TIN		
TIN	TIN SMELTING BRANCH OF YUNNAN TIN CO., LTD. TIN TECHNOLOGY & REFINING	CHINA* UNITED STATES OF AMERICA*
1110	TUYEN QUANG NON-FERROUS METALS JOINT STOCK	UNITED STATES OF AMERICA
TIN	COMPANY	VIET NAM
TIN	VQB MINERAL AND TRADING GROUP JSC	VIET NAM
TIN	WHITE SOLDER METALURGIA E MINERACAO LTDA.	BRAZIL*
TIN	YUNNAN CHENGFENG NON-FERROUS METALS CO., LTD.	CHINA*
TIN	YUNNAN YUNFAN NON-FERROUS METALS CO., LTD.	CHINA
TUNGSTEN	A.L.M.T. CORP.	JAPAN*
TUNGSTEN	ACL METAIS EIRELI	BRAZIL*
	ALBASTEEL INDUSTRIA E COMERCIO DE LIGAS PARA	
TUNGSTEN	FUNDICAO LTD.	BRAZIL* *
TUNGSTEN	ARTEK LLC	RUSSIAN FEDERATION
TUNGSTEN	ASIA TUNGSTEN PRODUCTS VIETNAM LTD.	VIET NAM*
TUNGSTEN	CHENZHOU DIAMOND TUNGSTEN PRODUCTS CO., LTD.	CHINA*
TUNGSTEN	CHINA MOLYBDENUM TUNGSTEN CO., LTD.	CHINA*
TUNGSTEN	CHONGYI ZHANGYUAN TUNGSTEN CO., LTD.	CHINA*
TUNGSTEN	CNMC (GUANGXI) PGMA CO., LTD.	CHINA
TUNGSTEN	CRONIMET BRASIL LTDA	BRAZIL*
TUNGSTEN	FUJIAN GANMIN RAREMETAL CO., LTD.	CHINA*
TUNGSTEN	FUJIAN JINXIN TUNGSTEN CO., LTD.	CHINA
TUNGSTEN	GANZHOU HAICHUANG TUNGSTEN CO., LTD.	CHINA*
TUNGSTEN	GANZHOU HUAXING TUNGSTEN PRODUCTS CO., LTD.	CHINA*
TUNGSTEN	GANZHOU JIANGWU FERROTUNGSTEN CO., LTD.	CHINA*
TUNGSTEN	GANZHOU SEADRAGON W & MO CO., LTD.	CHINA*
TUNGSTEN	GLOBAL TUNGSTEN & POWDERS CORP.	UNITED STATES OF AMERICA*
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Metal	Smelter Name	Country of Smelter Facility
TUNGSTEN	GUANGDONG XIANGLU TUNGSTEN CO., LTD.	CHINA*
TUNGSTEN	H.C. STARCK TUNGSTEN GMBH	GERMANY*
TUNGSTEN	HUBEI GREEN TUNGSTEN CO., LTD.	CHINA*
TUNGSTEN	HUNAN CHENZHOU MINING CO., LTD.	CHINA*
TUNGSTEN	HUNAN CHUANGDA VANADIUM TUNGSTEN CO., LTD. WUJI	CHINA
TUNGSTEN	HUNAN CHUNCHANG NONFERROUS METALS CO., LTD.	CHINA*
TUNGSTEN	HUNAN LITIAN TUNGSTEN INDUSTRY CO., LTD.	CHINA
TUNGSTEN	HYDROMETALLURG, JSC	RUSSIAN FEDERATION*
TUNGSTEN	JAPAN NEW METALS CO., LTD.	JAPAN*
TUNGSTEN	JIANGWU H.C. STARCK TUNGSTEN PRODUCTS CO., LTD.	CHINA*
TUNGSTEN	JIANGXI GAN BEI TUNGSTEN CO., LTD.	CHINA*
TUNGSTEN	JIANGXI MINMETALS GAO'AN NON-FERROUS METALS CO., LTD.	CHINA
TUNGSTEN	JIANGXI TONGGU NON-FERROUS METALLURGICAL & CHEMICAL CO., LTD.	CHINA*
TUNGSTEN	JIANGXI XIANGLU TUNGSTEN CO., LTD.	CHINA
TUNGSTEN	JIANGXI XINSHENG TUNGSTEN INDUSTRY CO., LTD.	CHINA*
TUNGSTEN	JIANGXI YAOSHENG TUNGSTEN CO., LTD.	CHINA*
TUNGSTEN	JSC "KIROVGRAD HARD ALLOYS PLANT"	<b>RUSSIAN FEDERATION*</b>
TUNGSTEN	KENNAMETAL FALLON	UNITED STATES OF AMERICA*
TUNGSTEN	KENNAMETAL HUNTSVILLE	UNITED STATES OF AMERICA*
TUNGSTEN	KGETS CO., LTD.	KOREA, REPUBLIC OF*
TUNGSTEN	LIANYOU METALS CO., LTD.	TAIWAN, PROVINCE OF CHINA*
TUNGSTEN	MALIPO HAIYU TUNGSTEN CO., LTD.	CHINA*
TUNGSTEN	MASAN HIGH-TECH MATERIALS	VIET NAM*
TUNGSTEN	MOLIREN LTD.	<b>RUSSIAN FEDERATION*</b>
TUNGSTEN	NIAGARA REFINING LLC	UNITED STATES OF AMERICA*
TUNGSTEN	NPP TYAZHMETPROM LLC	<b>RUSSIAN FEDERATION* *</b>
TUNGSTEN	PHILIPPINE CHUANGXIN INDUSTRIAL CO., INC.	PHILIPPINES*
TUNGSTEN	SOUTH-EAST NONFERROUS METAL COMPANY LIMITED OF HENGYANG CITY	CHINA
TUNGSTEN	TANIOBIS SMELTING GMBH & CO. KG	GERMANY*
TUNGSTEN	TEJING (VIETNAM) TUNGSTEN CO., LTD.	VIET NAM
TUNGSTEN	UNECHA REFRACTORY METALS PLANT	<b>RUSSIAN FEDERATION*</b>
TUNGSTEN	WOLFRAM BERGBAU UND HUTTEN AG	AUSTRIA*
TUNGSTEN	WOLTECH KOREA CO., LTD.	KOREA, REPUBLIC OF*
TUNGSTEN	XIAMEN TUNGSTEN (H.C.) CO., LTD.	CHINA*
TUNGSTEN	XIAMEN TUNGSTEN CO., LTD.	CHINA*
TUNGSTEN	XINFENG HUARUI TUNGSTEN & MOLYBDENUM NEW MATERIAL CO., LTD.	CHINA*
TUNGSTEN	XINHAI RENDAN SHAOGUAN TUNGSTEN CO., LTD.	CHINA

\*RMAP Conformant \*\*RMAP Active – in the process of becoming RMAP Conformant.