

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

FORM SD
SPECIALIZED DISCLOSURE REPORT



KIMBERLY-CLARK CORPORATION
(Exact name of the registrant as specified in its charter)

Delaware
(State or other jurisdiction of incorporation)

1-225
(Commission file number)

39-0394230
(I.R.S. Employer Identification No.)

P.O. Box 619100, Dallas, Texas
(Address of principal executive offices)

75261-9100
(Zip code)

Sandra J. MacQuillan, Senior Vice President and Chief Supply Chain Officer (972) 281-1200
(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, 2018 to December 31, 2018

Section 1 Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

Conflict Minerals Disclosure

This Specialized Disclosure Report on Form SD of Kimberly-Clark Corporation is for the period from January 1, 2018 to December 31, 2018. Unless the context indicates otherwise, “Kimberly-Clark,” “we,” “us,” and “our” refer to Kimberly-Clark Corporation and its consolidated subsidiaries.

During 2018, certain of our operations manufactured, or contracted to manufacture, products for which 3TGs (as defined below) are necessary to their functionality or production (“Covered Products”). The term “3TGs” refers to columbite-tantalite (coltan), cassiterite, gold, wolframite or their derivatives, which are limited to tantalum, tin and tungsten. Accordingly, we have conducted a reasonable country of origin inquiry (“RCOI”) that was designed to determine whether any of the 3TGs in our Covered Products originated in the Democratic Republic of the Congo or an adjoining country (Angola, Burundi, the Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda or Zambia), or were from recycled or scrap sources.

Information about our RCOI, as well as the steps we have taken to exercise due diligence on the source and chain of custody of any 3TGs in our Covered Products, is included in our Conflict Minerals Report, which is filed as an exhibit to this Form SD. In addition, our Conflict Minerals Report is publicly available at: <http://www.kimberly-clark.com/sustainability/people/CSC.aspx>.

Forward-Looking Statements

This Specialized Disclosure Report on Form SD, including the Conflict Minerals Report exhibit, contains forward-looking statements that are based upon management’s expectations and beliefs concerning future events impacting Kimberly-Clark. Certain matters contained herein concerning the future, including risk mitigation steps, constitute forward-looking statements and are based upon management’s expectations and beliefs. There can be no assurance that these future events will occur as anticipated.

Forward-looking statements speak only as of the date they were made, and we undertake no obligation to publicly update them. For a description of certain factors that could cause our future results to differ materially from those expressed in any forward-looking statement, see Item 1A of our Annual Report on Form 10-K for the year ended December 31, 2018, entitled “Risk Factors.”

Inherent Limitations on Due Diligence Procedures

As a downstream purchaser of 3TGs, or components containing 3TGs, our due diligence procedures can provide only reasonable, not absolute, assurance regarding the source and chain of custody of such materials. 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 3TGs. We also rely, to a large extent, on information collected and provided by third parties. Such sources of information may yield inaccurate or incomplete information and may be subject to fraud.

Item 1.02 Exhibit

We have filed our Conflict Minerals Report as Exhibit 1.01 to this Form SD.

Section 2 Exhibits

Item 2.01 Exhibits

Exhibit 1.01 Conflict Minerals Report as required by Items 1.01 and 1.02 of 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 duly authorized undersigned.

KIMBERLY-CLARK CORPORATION

Date: May 24, 2019

By: /s/ Sandra J. MacQuillan

Sandra J. MacQuillan
Senior Vice President and Chief
Supply Chain Officer

Kimberly-Clark Corporation
Conflict Minerals Report
for the Year Ended December 31, 2018

This Conflict Minerals Report of Kimberly-Clark Corporation has been prepared for the period from January 1, 2018 to December 31, 2018. Unless the context indicates otherwise, “Kimberly-Clark,” “we,” “us” and “our” refer to Kimberly-Clark Corporation and its consolidated subsidiaries.

During 2018, certain of our operations manufactured, or contracted to manufacture, products for which 3TGs (as defined below) are necessary to their functionality or production (“Covered Products”). The term “3TGs” refers to columbite-tantalite (coltan), cassiterite, gold, wolframite or their derivatives, which are limited to tantalum, tin and tungsten. The vast majority of our products do not contain 3TGs and our revenue from sales of Covered Products in 2018 was immaterial relative to our total net sales. In 2018, we manufactured or contracted for manufacture Covered Products primarily through our K-C Professional business. We have no reason to believe that any of the Covered Products are in our consumer businesses, which include our Personal Care and Consumer Tissue operating segments.

Electronic components account for a significant majority of any 3TGs present in our Covered Products. Electronic components commonly contain 3TGs for a variety of reasons (for example tin is usually present in solder). The Covered Products include dispensers (e.g., for hand sanitizers, soaps and paper products) which contain electronic sensors and actuators. In addition, certain of our welding kits may contain tin and tungsten in metal components of the kits.

We have developed a conflict minerals compliance program reasonably designed to identify whether the 3TGs in our Covered Products originated in the Democratic Republic of the Congo (“DRC”) or an adjoining country (Angola, Burundi, the Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda or Zambia) (collectively, the “Covered Countries”), or whether any of the 3TGs in our Covered Products are from recycled or scrap sources. Our conflict minerals compliance program is overseen by an internal team of subject matter experts from key functions (“Core Team”).

Description of Our Reasonable Country of Origin Inquiry

We have conducted a reasonable country of origin inquiry (“RCOI”) that was designed to determine whether any of the 3TGs in our Covered Products originated from one of the Covered Countries or was from recycled or scrap sources.

In conducting our RCOI, we used a risk-based approach. First, we identified our product materials which contain or potentially contain 3TGs necessary to their functionality or production. Second, we identified the direct suppliers of the materials, components and finished goods supplied to us for those products. Third, we risk-stratified each supplier’s “materials risk” based on the likelihood that the product materials they supply to us contain 3TGs. Fourth, we conducted a supply chain survey of our direct suppliers to provide information on the origin of any 3TGs contained in materials supplied to us in our Covered Products, including sources of 3TGs supplied to these direct suppliers from second-tier suppliers, as well as suppliers further upstream.

Our survey included those suppliers rated with a materials risk of high risk and medium risk. We have determined that it is not necessary to survey our low risk and very low risk rated suppliers, based on a sampling program we conducted in past

years in which we surveyed certain of these suppliers. This sampling program allowed us to confirm that the materials associated with our low risk and very low risk suppliers do not contain 3TGs.

Our supply chain survey employed the Conflict Minerals Reporting Template (the “CMRT”) version 5.11 developed by the Responsible Minerals Initiative (“RMI”) of the Responsible Business Alliance. The CMRT was developed to facilitate general disclosures and information regarding smelters and refiners that provide materials to the supplier. It includes questions regarding the supplier’s conflict-free minerals policy, the engagement process with its direct suppliers and identification of the smelters and refiners used by the supplier.

As of May 15, 2019, approximately 94% of our direct suppliers included in the supply chain survey have responded with a completed CMRT or acceptable declaration, including all of our high risk suppliers. We compared the list of smelters and refiners provided in our suppliers’ responses to the lists maintained by the RMI and, if a supplier indicated that a facility was certified as conformant, confirmed that the facility was listed on the RMI’s list of smelters or refiners that are conformant with the Responsible Minerals Assurance Process (“RMAP”) assessment protocols. No suppliers indicated that their supply chains for materials supplied to us include smelters or refiners known to be sourcing from the Covered Countries. However, many of the supplier responses were unable to specify all smelters or refiners used for materials supplied to us. Furthermore, many of the responses were provided at the company or division level, rather than the product level, and therefore, their list of smelters and refiners cannot be definitively linked to the products they provided to us.

Due Diligence Process

Following our RCOI, we conducted a due diligence review of the source and chain of custody of the 3TGs contained in our Covered Products. Our due diligence measures were designed to conform in all material respects with the framework in the Organization for Economic Co-operation and Development (“OECD”) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the related Supplements for gold and for tin, tantalum and tungsten.

Management Systems and Controls

Internal Team

We have a centralized, cross-functional conflict minerals Core Team to oversee the implementation and daily administration of the program, which includes geographically diverse representation from the following departments: Procurement; Legal; and Environmental, Health, Safety & Sustainability. The Core Team periodically reports to senior management on program developments and progress. Our Senior Vice President & Chief Supply Chain Officer serves as the executive sponsor of the Conflict Minerals Compliance program. Members of the Core Team have participated in industry groups, forums, and conferences focused on compliance with responsible sourcing of conflict minerals and related legal requirements.

Control Systems

We address 3TGs sourced from the Covered Countries in our Supplier Social Compliance Standards and our Supplier Stewardship Standards, which are embedded in our Purchase Order Terms and Conditions and certain of our supplier agreements, as well as posted in the Company/SupplierLINK/Standards and Requirements section of our corporate website at: <http://www.kimberly-clark.com>.

Our suppliers are required to source responsibly and adhere to our Supplier Social Compliance Standards, which require suppliers to source 3TGs from smelters and refiners who source outside of the Covered Countries or that are

designated as “conformant” by the RMI. These standards further require our suppliers to develop and provide written evidence of their own due diligence programs to promote “conflict-free” supply chains. We engage independent third-party audit firms to conduct Supplier Social Compliance audits (on-site inspections) of suppliers of certain commodity categories, particularly contract manufacturers. If an assessment reveals that the supplier is in violation of our Supplier Social Compliance Standards, we require that the supplier submit documentation showing that violations have been addressed and remediated. We conduct additional follow-up audits at our discretion to confirm compliance with our Supplier Social Compliance Standards. Any concerns regarding suppliers or our compliance program can be reported to our Corporate Social Compliance team as specified on our Corporate Social Compliance website. During 2018, we conducted 220 supplier audits covering 170 suppliers.

Supplier Engagement

We rely on our direct (tier one) suppliers to provide information on the origin of the 3TGs contained in components and materials supplied to us - including sources of 3TGs that are supplied to them from upstream suppliers.

In addition, we conduct periodic in-house training of our key functions, e.g., Research and Engineering; Procurement; and Environmental, Health, Safety & Sustainability, to educate employees to identify 3TGs in products and to work more closely with our suppliers to encourage responsible sourcing.

Grievance Mechanism

We maintain a comprehensive and multi-faceted system for the reporting of Code of Conduct violations, concerns and grievances. To ensure that every employee (and every stakeholder) has the ability to report concerns on an anonymous basis, we have established a Code of Conduct telephone helpline which is staffed by a professional independent company. This line is available 24 hours a day, 365 days a year, and one can give a report in any language. Our Code of Conduct, as well as the reporting process and helpline contact information, is available on our external website.

Calls are investigated by various internal subject matter experts in our Compliance, Internal Audit, Global Security, Human Resources and Legal departments. We report summary results and statistics to our executive leadership and our Board of Directors as deemed appropriate.

Maintenance of Records

We have adopted a policy to retain relevant documentation for a minimum of five years.

Identify and Assess Risk in the Supply Chain

As part of our due diligence process, we reviewed our suppliers’ responses to the supply chain survey against criteria developed to determine which responses required further engagement. These criteria included untimely or incomplete responses, as well as inconsistencies within the reported data.

Certain of the responses to the surveys included the names of facilities listed by the suppliers as smelters or refiners. We compared each facility listed in the responses to the lists of smelters and refiners maintained by the RMI to verify the existence of the facility and to determine whether the facility is certified as conformant with the RMAP assessment protocols

We classify each listed smelter or refiner as high, medium or low risk based on three scoring criteria: geographic proximity to the Covered Countries, Conflict-Free Sourcing Program audit status and known or plausible evidence of unethical or conflict sourcing. Based on these criteria, we have not identified any facilities as being high risk. In the event a supplier were to report a high risk facility on a CMRT, we would initiate risk mitigation

activities. If CMRT responses were to include any high or medium risk facility, we would immediately request the supplier to provide a product-specific CMRT to better identify any connection between the subject facilities and the products supplied to us.

If any smelter or refiner is not recognized by the RMI, we conduct outreach and research to gain more information about whether they are a smelter or a refiner, sourcing practices, location, and country of origin. Additionally, if any smelter is not certified conformant, we conduct outreach providing education on the Conflict-Free Smelter Program and encourage them to join this program.

Design and Implement a Strategy to Respond to Identified Risks

We have developed a risk management plan that includes the following elements:

- Communication directly with our suppliers of our conflict minerals requirements under our Supplier Social Compliance Standards, as described above.
- Communication with suppliers who do not satisfy our due diligence requests to obtain more complete and accurate responses.
- Additional follow up, due diligence, and/or risk mitigation activities, as appropriate, upon learning of changes in supplier circumstances or information.

Carry out Independent Third Party Audit of Supply Chain Due Diligence at Identified Points in the Supply Chain

We do not typically have a direct relationship with 3TG smelters and refiners, and we do not perform or direct audits of these entities within our supply chain.

Report Annually on Supply Chain Due Diligence

We report annually on supply chain due diligence by filing a Form SD and a Conflict Minerals Report with the SEC.

Due Diligence Results

Attachment A lists the 164 legitimate smelters and refiners that the suppliers we surveyed reported as being in their supply chains and indicates which of these smelters and refiners have been certified as RMAP Conformant. The majority of the responses received either provided data at a company or divisional level or did not specify the smelters or refiners used for materials supplied to us. We are therefore unable to determine whether the smelters or refiners reported by certain suppliers processed the 3TGs in the materials supplied to us or to validate that any of these smelters or refiners are actually in our supply chain. Attachment B contains an aggregated list of the countries of origin from which the reported facilities collectively source conflict minerals, based on information provided by suppliers and publicly by the RMI.

We believe that the inquiries and investigations described above represent a reasonable effort to determine the mines or locations of origin of the 3TGs in our Covered Products with the greatest possible specificity, including (1) seeking information about 3TG smelters and refiners in our supply chain through requesting that our suppliers complete the CMRT, (2) verifying those smelters and refiners using the RMI list, (3) conducting the due diligence review, and (4) obtaining additional documentation and verification, as applicable.

This Report has not been audited, nor is an independent private sector audit required for this Report.

Risk Mitigation and Due Diligence Improvement

We have taken or intend to take the following steps to further mitigate the risk that the 3TGs in our Covered Products could benefit armed groups in the Covered Countries:

- Continue to review the refinement and expansion of the RMI list of smelters and refiners to validate the smelters and refiners provided by suppliers.
- Provide continuing education of the Core Team and stakeholders on their on-going responsibilities with respect to conflict minerals compliance and any legislative or organizational developments.
- Encourage suppliers that provided company or division level information for 2018 to provide product level information for 2019 through ongoing communications with these suppliers.
- Maintain a global supplier screening program that requires our suppliers to provide information regarding 3TGs and requires each new in-scope direct supplier we add to our supply chain to provide a completed CMRT.

Attachment A
2018 Facility List

The following lists the smelters and refiners that the suppliers we surveyed reported as being in their supply chains and indicates which of these smelters and refiners have been certified as conflict-free.

Metal	Standard Smelter Name	Smelter Facility Location	RMI Conformance Level
Gold	Advanced Chemical Company	UNITED STATES OF AMERICA	CONFORMANT
Gold	Aida Chemical Industries Co., Ltd.	JAPAN	CONFORMANT
Gold	Allgemeine Gold-und Silberscheideanstalt A.G.	GERMANY	CONFORMANT
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN	CONFORMANT
Gold	AngloGold Ashanti Corrego do Sitio Mineracao	BRAZIL	CONFORMANT
Gold	Argor-Heraeus S.A.	SWITZERLAND	CONFORMANT
Gold	Asahi Pretec Corp.	JAPAN	CONFORMANT
Gold	Asahi Refining Canada Ltd.	CANADA	CONFORMANT
Gold	Asahi Refining USA Inc.	UNITED STATES OF AMERICA	CONFORMANT
Gold	Asaka Riken Co., Ltd.	JAPAN	CONFORMANT
Gold	Aurubis AG	GERMANY	CONFORMANT
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES	CONFORMANT
Gold	Boliden AB	SWEDEN	CONFORMANT
Gold	C. Hafner GmbH + Co. KG	GERMANY	CONFORMANT
Gold	CCR Refinery - Glencore Canada Corporation	CANADA	CONFORMANT
Gold	Chimet S.p.A.	ITALY	CONFORMANT
Gold	Chugai Mining	JAPAN	ACTIVE
Gold	Daejin Indus Co., Ltd.	KOREA, REPUBLIC OF	CONFORMANT
Gold	DODUCO Contacts and Refining GmbH	GERMANY	CONFORMANT
Gold	Dowa	JAPAN	CONFORMANT
Gold	DSC (Do Sung Corporation)	KOREA, REPUBLIC OF	CONFORMANT
Gold	Eco-System Recycling Co., Ltd.	JAPAN	CONFORMANT
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CHINA	CONFORMANT
Gold	Guangdong Jinding Gold Limited	CHINA	Unknown
Gold	Guoda Safina High-Tech Environmental Refinery Co., Ltd.	CHINA	Unknown
Gold	Heimerle + Meule GmbH	GERMANY	CONFORMANT
Gold	Heraeus Metals Hong Kong Ltd.	CHINA	CONFORMANT
Gold	Heraeus Precious Metals GmbH & Co. KG	GERMANY	CONFORMANT
Gold	Ishifuku Metal Industry Co., Ltd.	JAPAN	CONFORMANT
Gold	Japan Mint	JAPAN	CONFORMANT
Gold	Jiangxi Copper Co., Ltd.	CHINA	CONFORMANT
Gold	JX Nippon Mining & Metals Co., Ltd.	JAPAN	CONFORMANT
Gold	Kennecott Utah Copper LLC	UNITED STATES OF AMERICA	CONFORMANT

Metal	Standard Smelter Name	Smelter Facility Location	RMI Conformance Level
Gold	Kojima Chemicals Co., Ltd.	JAPAN	CONFORMANT
Gold	LS-NIKKO Copper Inc.	KOREA, REPUBLIC OF	CONFORMANT
Gold	Materion	UNITED STATES OF AMERICA	CONFORMANT
Gold	Matsuda Sangyo Co., Ltd.	JAPAN	CONFORMANT
Gold	Metalor Technologies (Hong Kong) Ltd.	CHINA	CONFORMANT
Gold	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE	CONFORMANT
Gold	Metalor Technologies S.A.	SWITZERLAND	CONFORMANT
Gold	Metalor USA Refining Corporation	UNITED STATES OF AMERICA	CONFORMANT
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	MEXICO	CONFORMANT
Gold	Mitsubishi Materials Corporation	JAPAN	CONFORMANT
Gold	Mitsui Mining and Smelting Co., Ltd.	JAPAN	CONFORMANT
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	TURKEY	CONFORMANT
Gold	Navoi Mining and Metallurgical Combinat	UZBEKISTAN	Unknown
Gold	Nihon Material Co., Ltd.	JAPAN	CONFORMANT
Gold	Ohura Precious Metal Industry Co., Ltd.	JAPAN	CONFORMANT
Gold	PAMP S.A.	SWITZERLAND	CONFORMANT
Gold	PT Aneka Tambang (Persero) Tbk	INDONESIA	CONFORMANT
Gold	PX Precinox S.A.	SWITZERLAND	CONFORMANT
Gold	Rand Refinery (Pty) Ltd.	SOUTH AFRICA	CONFORMANT
Gold	Republic Metals Corporation	UNITED STATES OF AMERICA	Unknown
Gold	Royal Canadian Mint	CANADA	CONFORMANT
Gold	SEMPA Joyeria Plateria S.A.	SPAIN	CONFORMANT
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CHINA	CONFORMANT
Gold	Solar Applied Materials Technology Corp.	TAIWAN	CONFORMANT
Gold	Sumitomo Metal Mining Co., Ltd.	JAPAN	CONFORMANT
Gold	Tanaka Kikinzoku Kogyo K.K.	JAPAN	CONFORMANT
Gold	The Refinery of Shandong Gold Mining Co., Ltd.	CHINA	CONFORMANT
Gold	Tokuriki Honten Co., Ltd.	JAPAN	CONFORMANT
Gold	Torecom	KOREA, REPUBLIC OF	CONFORMANT
Gold	Umicore S.A. Business Unit Precious Metals Refining	BELGIUM	CONFORMANT
Gold	United Precious Metal Refining, Inc.	UNITED STATES OF AMERICA	CONFORMANT
Gold	Valcambi S.A.	SWITZERLAND	CONFORMANT
Gold	Western Australian Mint (T/a The Perth Mint)	AUSTRALIA	CONFORMANT
Gold	Yamakin Co., Ltd.	JAPAN	CONFORMANT
Gold	Yokohama Metal Co., Ltd.	JAPAN	CONFORMANT
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA	CONFORMANT

Metal	Standard Smelter Name	Smelter Facility Location	RMI Conformance Level
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	CHINA	CONFORMANT
Tantalum	Exotech Inc.	UNITED STATES OF AMERICA	CONFORMANT
Tantalum	F&X Electro-Materials Ltd.	CHINA	CONFORMANT
Tantalum	Global Advanced Metals Aizu	JAPAN	CONFORMANT
Tantalum	Global Advanced Metals Boyertown	UNITED STATES OF AMERICA	CONFORMANT
Tantalum	Guangdong Rising Rare Metals-EO Materials Ltd.	CHINA	CONFORMANT
Tantalum	Guangdong Zhiyuan New Material Co., Ltd.	CHINA	CONFORMANT
Tantalum	H.C. Starck Hermsdorf GmbH	GERMANY	CONFORMANT
Tantalum	H.C. Starck Ltd.	JAPAN	CONFORMANT
Tantalum	H.C. Starck Smelting GmbH & Co. KG	GERMANY	CONFORMANT
Tantalum	H.C. Starck Tantalum and Niobium GmbH	GERMANY	CONFORMANT
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINA	CONFORMANT
Tantalum	KEMET Blue Metals	MEXICO	CONFORMANT
Tantalum	KEMET Blue Powder	UNITED STATES OF AMERICA	CONFORMANT
Tantalum	LSM Brasil S.A.	BRAZIL	CONFORMANT
Tantalum	Metallurgical Products India Pvt., Ltd.	INDIA	CONFORMANT
Tantalum	Mineracao Taboca S.A.	BRAZIL	CONFORMANT
Tantalum	Mitsui Mining and Smelting Co., Ltd.	JAPAN	CONFORMANT
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA	CONFORMANT
Tantalum	NPM Silmet AS	ESTONIA	CONFORMANT
Tantalum	QuantumClean	UNITED STATES OF AMERICA	CONFORMANT
Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	CHINA	CONFORMANT
Tantalum	Solikamsk Magnesium Works OAO	RUSSIAN FEDERATION	CONFORMANT
Tantalum	Taki Chemical Co., Ltd.	JAPAN	CONFORMANT
Tantalum	Telex Metals	UNITED STATES OF AMERICA	CONFORMANT
Tantalum	Ulba Metallurgical Plant JSC	KAZAKHSTAN	CONFORMANT
Tin	Alpha	UNITED STATES OF AMERICA	CONFORMANT
Tin	China Tin Group Co., Ltd.	CHINA	CONFORMANT
Tin	CV United Smelting	INDONESIA	CONFORMANT
Tin	CV Venus Inti Perkasa	INDONESIA	CONFORMANT
Tin	Dowa	JAPAN	CONFORMANT
Tin	EM Vinto	BOLIVIA	CONFORMANT
Tin	Fenix Metals	POLAND	CONFORMANT
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA	CONFORMANT
Tin	Gejiu Zili Mining And Metallurgy Co., Ltd.	CHINA	CONFORMANT
Tin	Huichang Jinshunda Tin Co., Ltd.	CHINA	CONFORMANT
Tin	Jiangxi Ketai Advanced Material Co., Ltd.	CHINA	Unknown
Tin	Magnu's Minerais Metais e Ligas Ltda.	BRAZIL	CONFORMANT

Metal	Standard Smelter Name	Smelter Facility Location	RMI Conformance Level
Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA	CONFORMANT
Tin	Melt Metais e Ligas S.A.	BRAZIL	CONFORMANT
Tin	Metallic Resources, Inc.	UNITED STATES OF AMERICA	CONFORMANT
Tin	Metallo Belgium N.V.	BELGIUM	CONFORMANT
Tin	Mineracao Taboca S.A.	BRAZIL	CONFORMANT
Tin	Mineracao Taboca S.A.	BRAZIL	CONFORMANT
Tin	Minsur	PERU	CONFORMANT
Tin	Mitsubishi Materials Corporation	JAPAN	CONFORMANT
Tin	Jiangxi New Nanshan Technology Ltd.	CHINA	CONFORMANT
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND	CONFORMANT
Tin	Operaciones Metalurgicas S.A.	BOLIVIA	CONFORMANT
Tin	PT Aries Kencana Sejahtera	INDONESIA	CONFORMANT
Tin	PT Artha Cipta Langgeng	INDONESIA	CONFORMANT
Tin	PT ATD Makmur Mandiri Jaya	INDONESIA	CONFORMANT
Tin	PT Babel Inti Perkasa	INDONESIA	CONFORMANT
Tin	PT Bangka Tin Industry	INDONESIA	CONFORMANT
Tin	PT Belitung Industri Sejahtera	INDONESIA	CONFORMANT
Tin	PT Bukit Timah	INDONESIA	CONFORMANT
Tin	PT DS Jaya Abadi	INDONESIA	CONFORMANT
Tin	PT Eunindo Usaha Mandiri	INDONESIA	Unknown
Tin	PT Inti Stania Prima	INDONESIA	CONFORMANT
Tin	PT Mitra Stania Prima	INDONESIA	CONFORMANT
Tin	PT Premium Tin Indonesia	INDONESIA	CONFORMANT
Tin	PT Prima Timah Utama	INDONESIA	CONFORMANT
Tin	PT Refined Bangka Tin	INDONESIA	CONFORMANT
Tin	PT Sariwiguna Binasentosa	INDONESIA	CONFORMANT
Tin	PT Stanindo Inti Perkasa	INDONESIA	CONFORMANT
Tin	PT Sumber Jaya Indah	INDONESIA	CONFORMANT
Tin	PT Timah Tbk Kundur	INDONESIA	CONFORMANT
Tin	PT Timah Tbk Mentok	INDONESIA	CONFORMANT
Tin	PT Tinindo Inter Nusa	INDONESIA	CONFORMANT
Tin	Rui Da Hung	TAIWAN	CONFORMANT
Tin	Thaisarco	THAILAND	CONFORMANT
Tin	White Solder Metalurgia e Mineracao Ltda.	BRAZIL	CONFORMANT
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA	CONFORMANT
Tin	Yunnan Tin Company Limited	CHINA	CONFORMANT
Tungsten	A.L.M.T. Corp.	JAPAN	CONFORMANT
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA	CONFORMANT
Tungsten	Fujian Jinxin Tungsten Co., Ltd.	CHINA	CONFORMANT
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	CHINA	CONFORMANT
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA	CONFORMANT

Metal	Standard Smelter Name	Smelter Facility Location	RMI Conformance Level
Tungsten	Global Tungsten & Powders Corp.	UNITED STATES OF AMERICA	CONFORMANT
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CHINA	CONFORMANT
Tungsten	H.C. Starck Tungsten GmbH	GERMANY	CONFORMANT
Tungsten	Hunan Chenzhou Mining Co., Ltd.	CHINA	CONFORMANT
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.	CHINA	CONFORMANT
Tungsten	Japan New Metals Co., Ltd.	JAPAN	CONFORMANT
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA	CONFORMANT
Tungsten	Jiangxi Xincheng Tungsten Industry Co., Ltd.	CHINA	CONFORMANT
Tungsten	Kennametal Fallon	UNITED STATES OF AMERICA	CONFORMANT
Tungsten	Kennametal Huntsville	UNITED STATES OF AMERICA	CONFORMANT
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CHINA	CONFORMANT
Tungsten	Niagara Refining LLC	UNITED STATES OF AMERICA	CONFORMANT
Tungsten	Tejing (Vietnam) Tungsten Co., Ltd.	VIETNAM	CONFORMANT
Tungsten	Wolfram Bergbau und Hutten AG	AUSTRIA	CONFORMANT
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CHINA	CONFORMANT
Tungsten	Xiamen Tungsten Co., Ltd.	CHINA	CONFORMANT

Attachment B
Countries of Origin

The following lists the countries of origin from which the reported facilities in Attachment A collectively source conflict minerals based on information provided by our suppliers and the CFSI.

AUSTRALIA
AUSTRIA
BELGIUM
BOLIVIA
BRAZIL
CANADA
CHINA
ESTONIA
GERMANY
INDIA
INDONESIA
ITALY
JAPAN
KAZAKHSTAN
KOREA, REPUBLIC OF
MALAYSIA

MEXICO
PERU
PHILIPPINES
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