



## **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, 2020 to December 31, 2020. Unless the context indicates otherwise, “Kimberly-Clark,” “we,” “us,” and “our” refer to Kimberly-Clark Corporation and its consolidated subsidiaries.

During 2020, 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 entitled “Risk Factors” in our Annual Report on Form 10-K for the year ended December 31, 2020.

#### **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 27, 2021

By: /s/ Gustavo L. Ghory  
Gustavo L. Ghory  
Senior Vice President and Chief Supply  
Chain Officer

**EXHIBIT INDEX**

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

**Kimberly-Clark Corporation**  
**Conflict Minerals Report**  
**for the Year Ended December 31, 2020**

This Conflict Minerals Report of Kimberly-Clark Corporation has been prepared for the period from January 1, 2020 to December 31, 2020. Unless the context indicates otherwise, “Kimberly-Clark,” “we,” “us” and “our” refer to Kimberly-Clark Corporation and its consolidated subsidiaries.

During 2020, 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 2020 was immaterial relative to our total net sales. In 2020, 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.

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 5.12 developed by the Responsible Minerals Initiative of the Responsible Business Alliance ("RMI"). 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 14, 2021, approximately 93% 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. Two suppliers indicated that their supply chains may include a single smelter that potentially could be sourcing from the Covered Countries; however, we have validated in the due diligence process described below that this smelter has been certified as conformant. 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 and Chief Supply Chain Officer serves as the executive sponsor of the Conflict Minerals Compliance program.

### 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 2020, we conducted 172 supplier audits covering 138 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 identified no facilities as being high risk. When a supplier reports a high risk facility on a CMRT, we initiate risk mitigation activities. When CMRT responses include any high or medium risk facilities, we 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 345 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 2020 to provide product level information for 2021 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**  
**2020 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 conformant.

| Metal | Standard Smelter Name   | Smelter Facility Location | RMI Conformance Level |
|-------|---|---------------------------|-----------------------|
| Gold  | 8853 S.p.A.   | ITALY                     | CONFORMANT            |
| Gold  | Abington Reldan Metals, LLC                                   | UNITED STATES OF AMERICA  | UNKNOWN               |
| Gold  | Advanced Chemical Company                                     | UNITED STATES OF AMERICA  | CONFORMANT            |
| Gold  | Aida Chemical Industries Co., Ltd.                            | JAPAN                     | CONFORMANT            |
| Gold  | Al Etihad Gold Refinery DMCC                                  | UNITED ARAB EMIRATES      | 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  | Atasay Kuyumculuk Sanayi Ve Ticaret A.S.                      | TURKEY                    | UNKNOWN               |
| Gold  | AU Traders and Refiners                                       | SOUTH AFRICA              | CONFORMANT            |
| Gold  | Augmont Enterprises Private Limited                           | INDIA                     | ACTIVE                |
| Gold  | Aurubis AG  | GERMANY                   | CONFORMANT            |
| Gold  | Bangalore Refinery  | INDIA                     | 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  | C.I Metales Procesados Industriales SAS                       | COLOMBIA                  | ACTIVE                |
| Gold  | Caridad   | MEXICO                    | UNKNOWN               |
| Gold  | CCR Refinery - Glencore Canada Corporation                    | CANADA                    | CONFORMANT            |
| Gold  | Cendres + Metaux S.A.   | SWITZERLAND               | CONFORMANT            |
| Gold  | CGR Metalloys Pvt Ltd.  | INDIA                     | UNKNOWN               |
| Gold  | Chimet S.p.A.   | ITALY                     | CONFORMANT            |
| Gold  | Chugai Mining   | JAPAN                     | CONFORMANT            |
| Gold  | Daye Non-Ferrous Metals Mining Ltd.                           | CHINA                     | UNKNOWN               |
| Gold  | Degussa Sonne / Mond Goldhandel GmbH                          | GERMANY                   | UNKNOWN               |
| Gold  | Dijllah Gold Refinery FZC                                     | UNITED ARAB EMIRATES      | UNKNOWN               |
| 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. East Plant                     | JAPAN                     | CONFORMANT            |
| Gold  | Eco-System Recycling Co., Ltd. North Plant                    | JAPAN                     | CONFORMANT            |

| Metal | Standard Smelter Name   | Smelter Facility Location | RMI Conformance Level |
|-------|---|---------------------------|-----------------------|
| Gold  | Eco-System Recycling Co., Ltd. West Plant                       | JAPAN                     | CONFORMANT            |
| Gold  | Emirates Gold DMCC  | UNITED ARAB EMIRATES      | CONFORMANT            |
| Gold  | Fidelity Printers and Refiners Ltd.                             | ZIMBABWE                  | UNKNOWN               |
| Gold  | Fujairah Gold FZC   | UNITED ARAB EMIRATES      | UNKNOWN               |
| Gold  | GCC Gujrat Gold Centre Pvt. Ltd.                                | INDIA                     | UNKNOWN               |
| Gold  | Geib Refining Corporation                                       | UNITED STATES OF AMERICA  | CONFORMANT            |
| Gold  | Gold Coast Refinery   | GHANA                     | UNKNOWN               |
| Gold  | Gold Refinery of Zijin Mining Group Co., Ltd.                   | CHINA                     | CONFORMANT            |
| Gold  | Great Wall Precious Metals Co., Ltd. of CBPM                    | CHINA                     | UNKNOWN               |
| Gold  | Guangdong Jinding Gold Limited                                  | CHINA                     | UNKNOWN               |
| Gold  | Guoda Safina High-Tech Environmental Refinery Co., Ltd.         | CHINA                     | UNKNOWN               |
| Gold  | Hangzhou Fuchunjiang Smelting Co., Ltd.                         | CHINA                     | UNKNOWN               |
| Gold  | Heimerle + Meule GmbH   | GERMANY                   | CONFORMANT            |
| Gold  | Heraeus Germany GmbH Co. KG                                     | GERMANY                   | ACTIVE                |
| Gold  | Heraeus Metals Hong Kong Ltd.                                   | CHINA                     | CONFORMANT            |
| Gold  | Hunan Chenzhou Mining Co., Ltd.                                 | CHINA                     | UNKNOWN               |
| Gold  | Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd.             | CHINA                     | UNKNOWN               |
| Gold  | HwaSeong CJ CO., LTD.   | KOREA, REPUBLIC OF        | UNKNOWN               |
| Gold  | Industrial Refining Company                                     | BELGIUM                   | UNKNOWN               |
| Gold  | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | CHINA                     | CONFORMANT            |
| Gold  | International Precious Metal Refiners                           | UNITED ARAB EMIRATES      | ACTIVE                |
| Gold  | Ishifuku Metal Industry Co., Ltd.                               | JAPAN                     | CONFORMANT            |
| Gold  | Istanbul Gold Refinery  | TURKEY                    | CONFORMANT            |
| Gold  | Italpreziosi  | ITALY                     | CONFORMANT            |
| Gold  | JALAN & Company   | INDIA                     | UNKNOWN               |
| Gold  | Japan Mint  | JAPAN                     | CONFORMANT            |
| Gold  | Jiangxi Copper Co., Ltd.  | CHINA                     | CONFORMANT            |
| Gold  | JSC Ekaterinburg Non-Ferrous Metal Processing Plant             | RUSSIAN FEDERATION        | UNKNOWN               |
| Gold  | JSC Novosibirsk Refinery  | RUSSIAN FEDERATION        | CONFORMANT            |
| Gold  | JSC Urals Electromet  | RUSSIAN FEDERATION        | CONFORMANT            |
| Gold  | JX Nippon Mining & Metals Co., Ltd.                             | JAPAN                     | CONFORMANT            |
| Gold  | Kaloti Precious Metals  | UNITED ARAB EMIRATES      | UNKNOWN               |
| Gold  | Kazakhmys Smelting LLC  | KAZAKHSTAN                | UNKNOWN               |
| Gold  | Kazzinc   | KAZAKHSTAN                | CONFORMANT            |
| Gold  | Kennecott Utah Copper LLC                                       | UNITED STATES OF AMERICA  | CONFORMANT            |
| Gold  | KGHM Polska Miedz Spolka Akcyjna                                | POLAND                    | CONFORMANT            |
| Gold  | Kojima Chemicals Co., Ltd.                                      | JAPAN                     | CONFORMANT            |
| Gold  | Korea Zinc Co., Ltd.  | KOREA, REPUBLIC OF        | CONFORMANT            |
| Gold  | Kundan Care Products Ltd.                                       | INDIA                     | UNKNOWN               |
| Gold  | Kyrgyzalyn JSC  | KYRGYZSTAN                | CONFORMANT            |
| Gold  | Kyshtym Copper-Electrolytic Plant ZAO                           | RUSSIAN FEDERATION        | UNKNOWN               |

| Metal | Standard Smelter Name   | Smelter Facility Location | RMI Conformance Level |
|-------|---|---------------------------|-----------------------|
| Gold  | L'azurde Company For Jewelry  | SAUDI ARABIA              | UNKNOWN               |
| Gold  | Lingbao Gold Co., Ltd.  | CHINA                     | UNKNOWN               |
| Gold  | Lingbao Jinyuan Tonghui Refinery Co., Ltd.                                  | CHINA                     | UNKNOWN               |
| Gold  | L'Orfebre S.A.  | ANDORRA                   | CONFORMANT            |
| Gold  | LS-NIKKO Copper Inc.  | KOREA, REPUBLIC OF        | CONFORMANT            |
| Gold  | LT Metal Ltd.   | KOREA, REPUBLIC OF        | CONFORMANT            |
| Gold  | Luoyang Zijin Yinhui Gold Refinery Co., Ltd.                                | CHINA                     | UNKNOWN               |
| Gold  | Marsam Metals   | BRAZIL                    | 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 (Suzhou) Ltd.  | CHINA                     | 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  | MMTC-PAMP India Pvt., Ltd.  | INDIA                     | CONFORMANT            |
| Gold  | Modeltech Sdn Bhd   | MALAYSIA                  | UNKNOWN               |
| Gold  | Morris and Watson   | NEW ZEALAND               | UNKNOWN               |
| Gold  | Moscow Special Alloys Processing Plant                                      | RUSSIAN FEDERATION        | CONFORMANT            |
| Gold  | Nadir Metal Rafineri San. Ve Tic. A.S.                                      | TURKEY                    | CONFORMANT            |
| Gold  | Navoi Mining and Metallurgical Combinat                                     | UZBEKISTAN                | CONFORMANT            |
| Gold  | NH Recytech Company   | KOREA, REPUBLIC OF        | UNKNOWN               |
| Gold  | Nihon Material Co., Ltd.  | JAPAN                     | CONFORMANT            |
| Gold  | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH                 | AUSTRIA                   | CONFORMANT            |
| Gold  | Ohura Precious Metal Industry Co., Ltd.                                     | JAPAN                     | CONFORMANT            |
| Gold  | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | RUSSIAN FEDERATION        | CONFORMANT            |
| Gold  | PAMP S.A.   | SWITZERLAND               | CONFORMANT            |
| Gold  | Pease & Curren  | UNITED STATES OF AMERICA  | UNKNOWN               |
| Gold  | Penglai Penggang Gold Industry Co., Ltd.                                    | CHINA                     | UNKNOWN               |
| Gold  | Planta Recuperadora de Metales SpA  | CHILE                     | CONFORMANT            |
| Gold  | Prioksky Plant of Non-Ferrous Metals  | RUSSIAN FEDERATION        | CONFORMANT            |
| Gold  | PT Aneka Tambang (Persero) Tbk  | INDONESIA                 | CONFORMANT            |
| Gold  | PX Precinox S.A.  | SWITZERLAND               | CONFORMANT            |
| Gold  | QG Refining, LLC  | UNITED STATES OF AMERICA  | UNKNOWN               |
| Gold  | Rand Refinery (Pty) Ltd.  | SOUTH AFRICA              | CONFORMANT            |
| Gold  | Refinery of Seemine Gold Co., Ltd.  | CHINA                     | UNKNOWN               |
| Gold  | REMONDIS PMR B.V.   | NETHERLANDS               | CONFORMANT            |
| Gold  | Royal Canadian Mint   | CANADA                    | CONFORMANT            |
| Gold  | SAAMP   | FRANCE                    | CONFORMANT            |

| Metal | Standard Smelter Name  | Smelter Facility Location | RMI Conformance Level |
|-------|--|---------------------------|-----------------------|
| Gold  | Sabin Metal Corp.  | UNITED STATES OF AMERICA  | UNKNOWN               |
| Gold  | Safimet S.p.A  | ITALY                     | CONFORMANT            |
| Gold  | SAFINA A.S.  | CZECHIA                   | CONFORMANT            |
| Gold  | Sai Refinery   | INDIA                     | UNKNOWN               |
| Gold  | Samduck Precious Metals  | KOREA, REPUBLIC OF        | CONFORMANT            |
| Gold  | Samwon Metals Corp.  | KOREA, REPUBLIC OF        | UNKNOWN               |
| Gold  | SAXONIA Edelmetalle GmbH   | GERMANY                   | CONFORMANT            |
| Gold  | SEMPSA Joyeria Plateria S.A.   | SPAIN                     | CONFORMANT            |
| Gold  | Shandong Gold Smelting Co., Ltd.                                     | CHINA                     | CONFORMANT            |
| Gold  | Shandong Humon Smelting Co., Ltd.                                    | CHINA                     | UNKNOWN               |
| Gold  | Shandong Tiancheng Biological Gold Industrial Co., Ltd.              | CHINA                     | UNKNOWN               |
| Gold  | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.                    | CHINA                     | CONFORMANT            |
| Gold  | Shirpur Gold Refinery Ltd.   | INDIA                     | UNKNOWN               |
| Gold  | Sichuan Tianze Precious Metals Co., Ltd.                             | CHINA                     | CONFORMANT            |
| Gold  | Singway Technology Co., Ltd.   | TAIWAN                    | CONFORMANT            |
| Gold  | SOE Shyolkovsky Factory of Secondary Precious Metals                 | RUSSIAN FEDERATION        | CONFORMANT            |
| Gold  | Solar Applied Materials Technology Corp.                             | TAIWAN                    | CONFORMANT            |
| Gold  | Sovereign Metals   | INDIA                     | UNKNOWN               |
| Gold  | State Research Institute Center for Physical Sciences and Technology | LITHUANIA                 | UNKNOWN               |
| Gold  | Sudan Gold Refinery  | SUDAN                     | UNKNOWN               |
| Gold  | Sumitomo Metal Mining Co., Ltd.                                      | JAPAN                     | CONFORMANT            |
| Gold  | SungEel HiMetal Co., Ltd.  | KOREA, REPUBLIC OF        | CONFORMANT            |
| Gold  | T.C.A S.p.A  | ITALY                     | CONFORMANT            |
| Gold  | Tanaka Kikinzoku Kogyo K.K.  | JAPAN                     | CONFORMANT            |
| Gold  | Tokuriki Honten Co., Ltd.  | JAPAN                     | CONFORMANT            |
| Gold  | Tongling Nonferrous Metals Group Co., Ltd.                           | CHINA                     | UNKNOWN               |
| Gold  | TOO Tau-Ken-Altyn  | KAZAKHSTAN                | CONFORMANT            |
| Gold  | Torecom  | KOREA, REPUBLIC OF        | CONFORMANT            |
| Gold  | TSK Pretech  | KOREA, REPUBLIC OF        | CONFORMANT            |
| Gold  | Umicore Brasil Ltda.   | BRAZIL                    | UNKNOWN               |
| Gold  | Umicore Precious Metals Thailand                                     | THAILAND                  | 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  | WIELAND Edelmetalle GmbH   | GERMANY                   | CONFORMANT            |
| Gold  | Yamakin Co., Ltd.  | JAPAN                     | CONFORMANT            |
| Gold  | Yokohama Metal Co., Ltd.   | JAPAN                     | CONFORMANT            |
| Gold  | Yunnan Copper Industry Co., Ltd.                                     | CHINA                     | UNKNOWN               |
| Gold  | Zhongyuan Gold Smelter of Zhongjin Gold Corporation                  | CHINA                     | CONFORMANT            |

| Metal    | Standard Smelter Name                             | Smelter Facility Location | RMI Conformance Level |
|----------|---|---------------------------|-----------------------|
| Tantalum | AMG Brasil  | BRAZIL                    | CONFORMANT            |
| Tantalum | Asaka Riken Co., Ltd.                             | JAPAN                     | CONFORMANT            |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd.         | CHINA                     | CONFORMANT            |
| Tantalum | CP Metals Inc.                                    | UNITED STATES OF AMERICA  | UNKNOWN               |
| Tantalum | D Block Metals, LLC                               | UNITED STATES OF AMERICA  | CONFORMANT            |
| Tantalum | Exotech Inc.                                      | UNITED STATES OF AMERICA  | CONFORMANT            |
| Tantalum | F&X Electro-Materials Ltd.                        | CHINA                     | CONFORMANT            |
| Tantalum | FIR Metals & Resource Ltd.                        | CHINA                     | CONFORMANT            |
| Tantalum | Global Advanced Metals Aizu                       | JAPAN                     | CONFORMANT            |
| Tantalum | Global Advanced Metals Boyertown                  | UNITED STATES OF AMERICA  | CONFORMANT            |
| Tantalum | H.C. Starck Hermsdorf GmbH                        | GERMANY                   | CONFORMANT            |
| Tantalum | H.C. Starck Inc.                                  | UNITED STATES OF AMERICA  | CONFORMANT            |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd. | CHINA                     | CONFORMANT            |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd.      | CHINA                     | CONFORMANT            |
| Tantalum | Jiangxi Tuohong New Raw Material                  | CHINA                     | CONFORMANT            |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd.       | CHINA                     | CONFORMANT            |
| Tantalum | Jiujiang Tanbre Co., Ltd.                         | CHINA                     | CONFORMANT            |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd.     | CHINA                     | CONFORMANT            |
| Tantalum | KEMET de Mexico                                   | MEXICO                    | CONFORMANT            |
| Tantalum | Meta Materials                                    | NORTH MACEDONIA           | 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 | Resind Industria e Comercio Ltda.                 | BRAZIL                    | CONFORMANT            |
| Tantalum | Solikamsk Magnesium Works OAO                     | RUSSIAN FEDERATION        | CONFORMANT            |
| Tantalum | Taki Chemical Co., Ltd.                           | JAPAN                     | CONFORMANT            |
| Tantalum | TANIOBIS Co., Ltd.                                | THAILAND                  | CONFORMANT            |
| Tantalum | TANIOBIS GmbH                                     | GERMANY                   | CONFORMANT            |
| Tantalum | TANIOBIS Japan Co., Ltd.                          | JAPAN                     | CONFORMANT            |
| Tantalum | TANIOBIS Smelting GmbH & Co. KG                   | GERMANY                   | CONFORMANT            |
| Tantalum | Telex Metals                                      | UNITED STATES OF AMERICA  | CONFORMANT            |
| Tantalum | Ulba Metallurgical Plant JSC                      | KAZAKHSTAN                | CONFORMANT            |
| Tantalum | XIMEI RESOURCES (GUANGDONG) LIMITED               | CHINA                     | CONFORMANT            |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd.     | CHINA                     | CONFORMANT            |
| Tantalum | Yanling Jincheng Tantalum & Niobium Co., Ltd.     | CHINA                     | CONFORMANT            |
| Tin      | Alpha   | UNITED STATES OF AMERICA  | CONFORMANT            |
| Tin      | An Vinh Joint Stock Mineral Processing Company    | VIETNAM                   | UNKNOWN               |

| Metal | Standard Smelter Name   | Smelter Facility Location | RMI Conformance Level |
|-------|---|---------------------------|-----------------------|
| Tin   | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.                                     | CHINA                     | CONFORMANT            |
| Tin   | Chifeng Dajingzi Tin Industry Co., Ltd.   | CHINA                     | CONFORMANT            |
| Tin   | China Tin Group Co., Ltd.   | CHINA                     | CONFORMANT            |
| Tin   | Cooper Santa  | BRAZIL                    | UNKNOWN               |
| Tin   | CV Ayi Jaya   | INDONESIA                 | ACTIVE                |
| Tin   | CV Dua Sekawan  | INDONESIA                 | UNKNOWN               |
| Tin   | CV Gita Pesona  | INDONESIA                 | UNKNOWN               |
| Tin   | CV United Smelting  | INDONESIA                 | UNKNOWN               |
| Tin   | CV Venus Inti Perkasa   | INDONESIA                 | ACTIVE                |
| Tin   | Dongguan CiEXPO Environmental Engineering Co., Ltd.                                   | CHINA                     | UNKNOWN               |
| Tin   | Dowa  | JAPAN                     | CONFORMANT            |
| Tin   | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | VIETNAM                   | UNKNOWN               |
| Tin   | EM Vinto  | BOLIVIA                   | CONFORMANT            |
| Tin   | Estanho de Rondonia S.A.  | BRAZIL                    | ACTIVE                |
| Tin   | Fenix Metals  | POLAND                    | CONFORMANT            |
| Tin   | Gejiu City Fuxiang Industry and Trade Co., Ltd.                                       | CHINA                     | UNKNOWN               |
| Tin   | Gejiu Fengming Metallurgy Chemical Plant  | CHINA                     | CONFORMANT            |
| Tin   | Gejiu Jinye Mineral Company   | CHINA                     | UNKNOWN               |
| Tin   | Gejiu Kai Meng Industry and Trade LLC   | CHINA                     | CONFORMANT            |
| Tin   | Gejiu Non-Ferrous Metal Processing Co., Ltd.  | CHINA                     | CONFORMANT            |
| Tin   | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.  | CHINA                     | CONFORMANT            |
| Tin   | Gejiu Zili Mining And Metallurgy Co., Ltd.  | CHINA                     | CONFORMANT            |
| Tin   | Guangdong Hanhe Non-Ferrous Metal Co., Ltd.   | CHINA                     | CONFORMANT            |
| Tin   | Guanyang Guida Nonferrous Metal Smelting Plant  | CHINA                     | CONFORMANT            |
| Tin   | HuiChang Hill Tin Industry Co., Ltd.  | CHINA                     | CONFORMANT            |
| Tin   | Huichang Jinshunda Tin Co., Ltd.  | CHINA                     | CONFORMANT            |
| Tin   | Jiangxi Ketai Advanced Material Co., Ltd.   | CHINA                     | UNKNOWN               |
| Tin   | Jiangxi New Nanshan Technology Ltd.   | CHINA                     | CONFORMANT            |
| Tin   | Luna Smelter, Ltd.  | RWANDA                    | CONFORMANT            |
| Tin   | Ma'anshan Weitai Tin Co., Ltd.  | CHINA                     | CONFORMANT            |
| Tin   | Magnu's Minerais Metais e Ligas Ltda.   | BRAZIL                    | CONFORMANT            |
| 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   | Metallo Spain S.L.U.  | SPAIN                     | CONFORMANT            |
| Tin   | Mineracao Taboca S.A.   | BRAZIL                    | CONFORMANT            |
| Tin   | Minsur  | PERU                      | CONFORMANT            |
| Tin   | Mitsubishi Materials Corporation  | JAPAN                     | CONFORMANT            |
| Tin   | Modeltech Sdn Bhd   | MALAYSIA                  | UNKNOWN               |



| Metal | Standard Smelter Name                            | Smelter Facility Location | RMI Conformance Level |
|-------|--|---------------------------|-----------------------|
| Tin   | Nghe Tinh Non-Ferrous Metals Joint Stock Company | VIETNAM                   | UNKNOWN               |
| Tin   | O.M. Manufacturing (Thailand) Co., Ltd.          | THAILAND                  | CONFORMANT            |
| Tin   | O.M. Manufacturing Philippines, Inc.             | PHILIPPINES               | CONFORMANT            |
| Tin   | Operaciones Metalurgicas S.A.                    | BOLIVIA                   | CONFORMANT            |
| Tin   | Pongpipat Company Limited                        | MYANMAR                   | UNKNOWN               |
| Tin   | Precious Minerals and Smelting Limited           | INDIA                     | UNKNOWN               |
| Tin   | PT Aries Kencana Sejahtera                       | INDONESIA                 | ACTIVE                |
| Tin   | PT Artha Cipta Langgeng                          | INDONESIA                 | CONFORMANT            |
| Tin   | PT ATD Makmur Mandiri Jaya                       | INDONESIA                 | CONFORMANT            |
| Tin   | PT Babel Inti Perkasa                            | INDONESIA                 | CONFORMANT            |
| Tin   | PT Babel Surya Alam Lestari                      | INDONESIA                 | CONFORMANT            |
| Tin   | PT Bangka Prima Tin                              | INDONESIA                 | UNKNOWN               |
| Tin   | PT Bangka Serumpun                               | INDONESIA                 | CONFORMANT            |
| Tin   | PT Bangka Tin Industry                           | INDONESIA                 | UNKNOWN               |
| Tin   | PT Belitung Industri Sejahtera                   | INDONESIA                 | UNKNOWN               |
| Tin   | PT Bukit Timah                                   | INDONESIA                 | ACTIVE                |
| Tin   | PT DS Jaya Abadi                                 | INDONESIA                 | UNKNOWN               |
| Tin   | PT Eunindo Usaha Mandiri                         | INDONESIA                 | UNKNOWN               |
| Tin   | PT Inti Stania Prima                             | INDONESIA                 | UNKNOWN               |
| Tin   | PT Karimun Mining                                | INDONESIA                 | UNKNOWN               |
| Tin   | PT Kijang Jaya Mandiri                           | INDONESIA                 | UNKNOWN               |
| Tin   | PT Lautan Harmonis Sejahtera                     | INDONESIA                 | ACTIVE                |
| Tin   | PT Menara Cipta Mulia                            | INDONESIA                 | CONFORMANT            |
| Tin   | PT Mitra Stania Prima                            | INDONESIA                 | CONFORMANT            |
| Tin   | PT Mitra Sukses Globalindo                       | INDONESIA                 | UNKNOWN               |
| Tin   | PT Panca Mega Persada                            | INDONESIA                 | UNKNOWN               |
| Tin   | PT Premium Tin Indonesia                         | INDONESIA                 | UNKNOWN               |
| Tin   | PT Prima Timah Utama                             | INDONESIA                 | CONFORMANT            |
| Tin   | PT Rajawali Rimba Perkasa                        | INDONESIA                 | CONFORMANT            |
| Tin   | PT Rajehan Ariq                                  | INDONESIA                 | CONFORMANT            |
| Tin   | PT Refined Bangka Tin                            | INDONESIA                 | CONFORMANT            |
| Tin   | PT Sariwiguna Binasentosa                        | INDONESIA                 | UNKNOWN               |
| Tin   | PT Stanindo Inti Perkasa                         | INDONESIA                 | CONFORMANT            |
| Tin   | PT Sukses Inti Makmur                            | INDONESIA                 | ACTIVE                |
| Tin   | PT Sumber Jaya Indah                             | INDONESIA                 | UNKNOWN               |
| Tin   | PT Timah Tbk Kundur                              | INDONESIA                 | CONFORMANT            |
| Tin   | PT Timah Tbk Mentok                              | INDONESIA                 | CONFORMANT            |
| Tin   | PT Tinindo Inter Nusa                            | INDONESIA                 | CONFORMANT            |
| Tin   | PT Tirus Putra Mandiri                           | INDONESIA                 | UNKNOWN               |
| Tin   | PT Tommy Utama                                   | INDONESIA                 | UNKNOWN               |
| Tin   | Resind Industria e Comercio Ltda.                | BRAZIL                    | CONFORMANT            |
| Tin   | Rui Da Hung                                      | TAIWAN                    | CONFORMANT            |

| Metal    | Standard Smelter Name   | Smelter Facility Location | RMI Conformance Level |
|----------|---|---------------------------|-----------------------|
| Tin      | Soft Metais Ltda.   | BRAZIL                    | CONFORMANT            |
| Tin      | Super Ligas   | BRAZIL                    | ACTIVE                |
| Tin      | Thai Nguyen Mining and Metallurgy Co., Ltd.                   | VIET NAM                  | CONFORMANT            |
| Tin      | Thaisarco   | THAILAND                  | CONFORMANT            |
| Tin      | Tin Technology & Refining                                     | UNITED STATES OF AMERICA  | CONFORMANT            |
| Tin      | Tuyen Quang Non-Ferrous Metals Joint Stock Company            | VIETNAM                   | UNKNOWN               |
| 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            |
| Tin      | Yunnan Yunfan Non-ferrous Metals Co., Ltd.                    | CHINA                     | CONFORMANT            |
| Tungsten | A.L.M.T. Corp.  | JAPAN                     | CONFORMANT            |
| Tungsten | ACL Metais Eireli   | BRAZIL                    | CONFORMANT            |
| Tungsten | Albasteel Industria e Comercio de Ligas Para Fundicao Ltd.    | BRAZIL                    | ACTIVE                |
| Tungsten | Asia Tungsten Products Vietnam Ltd.                           | VIETNAM                   | CONFORMANT            |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd.                  | CHINA                     | CONFORMANT            |
| Tungsten | China Molybdenum Tungsten Co., Ltd.                           | CHINA                     | CONFORMANT            |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd.                          | CHINA                     | CONFORMANT            |
| Tungsten | CNMC (Guangxi) PGMA Co., Ltd.                                 | CHINA                     | UNKNOWN               |
| Tungsten | CP Metals Inc.  | UNITED STATES OF AMERICA  | UNKNOWN               |
| Tungsten | Cronimet Brasil Ltda  | BRAZIL                    | ACTIVE                |
| Tungsten | Fujian Ganmin RareMetal Co., Ltd.                             | CHINA                     | CONFORMANT            |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd.                              | China                     | UNKNOWN               |
| Tungsten | Ganzhou Haichuang Tungsten Co., Ltd.                          | CHINA                     | CONFORMANT            |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd.                   | CHINA                     | CONFORMANT            |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd.                       | CHINA                     | CONFORMANT            |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd.                            | CHINA                     | CONFORMANT            |
| 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 Chuangda Vanadium Tungsten Co., Ltd. Wuji               | CHINA                     | CONFORMANT            |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd.                   | CHINA                     | CONFORMANT            |
| Tungsten | Hunan Litian Tungsten Industry Co., Ltd.                      | CHINA                     | CONFORMANT            |
| Tungsten | Hydrometallurg, JSC   | RUSSIAN FEDERATION        | CONFORMANT            |
| Tungsten | Japan New Metals Co., Ltd.                                    | JAPAN                     | CONFORMANT            |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd.               | CHINA                     | CONFORMANT            |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd.                            | CHINA                     | CONFORMANT            |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.         | CHINA                     | UNKNOWN               |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | CHINA                     | CONFORMANT            |

| Metal    | Standard Smelter Name  | Smelter Facility Location | RMI Conformance Level |
|----------|--|---------------------------|-----------------------|
| Tungsten | Jiangxi Xianglu Tungsten Co., Ltd.                           | CHINA                     | UNKNOWN               |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd.                 | CHINA                     | CONFORMANT            |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd.                          | CHINA                     | CONFORMANT            |
| Tungsten | Jingmen Dewei GEM Tungsten Resources Recycling Co., Ltd.     | CHINA                     | ACTIVE                |
| Tungsten | JSC "Kirovgrad Hard Alloys Plant"                            | RUSSIAN FEDERATION        | ACTIVE                |
| Tungsten | Kennametal Fallon  | UNITED STATES OF AMERICA  | CONFORMANT            |
| Tungsten | Kennametal Huntsville  | UNITED STATES OF AMERICA  | CONFORMANT            |
| Tungsten | KGETS Co., Ltd.  | KOREA, REPUBLIC OF        | CONFORMANT            |
| Tungsten | Lianyou Metals Co., Ltd.                                     | TAIWAN                    | CONFORMANT            |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd.                              | CHINA                     | CONFORMANT            |
| Tungsten | Masan High-Tech Materials                                    | VIETNAM                   | CONFORMANT            |
| Tungsten | Moliren Ltd.   | RUSSIAN FEDERATION        | CONFORMANT            |
| Tungsten | Niagara Refining LLC   | UNITED STATES OF AMERICA  | CONFORMANT            |
| Tungsten | NPP Tyazhmetprom LLC   | RUSSIAN FEDERATION        | ACTIVE                |
| Tungsten | Philippine Chuangxin Industrial Co., Inc.                    | PHILIPPINES               | CONFORMANT            |
| Tungsten | South-East Nonferrous Metal Company Limited of Hengyang City | CHINA                     | UNKNOWN               |
| Tungsten | TANIOBIS Smelting GmbH & Co. KG                              | GERMANY                   | CONFORMANT            |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd.                          | VIETNAM                   | CONFORMANT            |
| Tungsten | Unecha Refractory metals plant                               | RUSSIAN FEDERATION        | CONFORMANT            |
| Tungsten | Wolfram Bergbau und Hutten AG                                | AUSTRIA                   | CONFORMANT            |
| Tungsten | Woltech Korea Co., Ltd.                                      | KOREA, REPUBLIC OF        | CONFORMANT            |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd.                             | CHINA                     | CONFORMANT            |
| Tungsten | Xiamen Tungsten Co., Ltd.                                    | CHINA                     | CONFORMANT            |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.  | CHINA                     | CONFORMANT            |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd.                    | CHINA                     | UNKNOWN               |

**Attachment B**  
**2020 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 RMI.

|           |                    |                          |
|-----------|--------------------|--------------------------|
| ANDORRA   | ITALY              | SAUDI ARABIA             |
| AUSTRALIA | JAPAN              | SINGAPORE                |
| AUSTRIA   | KAZAKHSTAN         | SOUTH AFRICA             |
| BELGIUM   | KOREA, REPUBLIC OF | SPAIN                    |
| BOLIVIA   | KYRGYZSTAN         | SUDAN                    |
| BRAZIL    | LITHUANIA          | SWEDEN                   |
| CANADA    | MALAYSIA           | SWITZERLAND              |
| CHILE     | MEXICO             | TAIWAN                   |
| CHINA     | MYANMAR            | THAILAND                 |
| COLOMBIA  | NETHERLANDS        | TURKEY                   |
| CZECHIA   | NEW ZEALAND        | UNITED ARAB EMIRATES     |
| ESTONIA   | NORTH MACEDONIA    | UNITED STATES OF AMERICA |
| FRANCE    | PERU               | UZBEKISTAN               |
| GERMANY   | PHILIPPINES        | VIETNAM                  |
| GHANA     | POLAND             | ZIMBABWE                 |
| INDIA     | RUSSIAN FEDERATION |                          |
| INDONESIA | RWANDA             |                          |