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

FORM SD

SPECIALIZED DISCLOSURE REPORT

Thor Industries, Inc.
(Exact Name of Registrant as Specified in Charter)

Delaware
(State or Other Jurisdiction
of Incorporation)

1-9235
(Commission
File Number)

93-0768752
(IRS Employer
Identification No.)

**601 East Beardsley Avenue,
Elkhart, Indiana**
(Address of Principal Executive Offices)

46514-3305
(Zip Code)

W. Todd Woelfer
Senior Vice President, General Counsel and Corporate Secretary
(Name and telephone number, including area code, of the person to contact in connection with this report.)

(574) 970-7460

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

☒ Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2019.

Section 1 – Conflict Minerals Disclosure**Item 1.01 Conflict Minerals Disclosure and Report****Conflict Minerals Disclosure**

This Form SD is filed by Thor Industries, Inc. (the “Company”) pursuant to Rule 13p-1 under the Securities Exchange Act of 1934, as amended, for the reporting period from January 1 through December 31, 2019.

A copy of the Company’s Conflict Minerals Report is filed as Exhibit 1.01 hereto. A copy of the report is publicly available at <http://ir.thorindustries.com>.

Item 1.02 Exhibit

A copy of the Company’s Conflict Minerals Report is filed as Exhibit 1.01 hereto.

Section 2 – Exhibits**Item 2.01 Exhibits**

| Exhibit Number | Description |
|----------------|---|
| 1.01 | Conflict Minerals Report as required by Items 1.01 and 1.02 of this Form. |

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 undersigned hereunto duly authorized.

Date: May 29, 2020

Thor Industries, Inc.

By: /s/ W. Todd Woelfer

Name: W. Todd Woelfer

Title: Senior Vice President, General Counsel and Corporate Secretary

THOR INDUSTRIES, INC.
Conflict Minerals Report
For the Year Ended December 31, 2019

This is the Conflict Minerals¹ Report (the “Report”) of Thor Industries, Inc. (“Thor”, the “Company”, “we”, “us”, or “our”) for the reporting period January 1, 2019 to December 31, 2019 pursuant to Rule 13p-1 (the “Rule”) under the Securities Exchange Act of 1934, as amended, (the “Act”).

I. Company and Product Overview

During the reporting period, Thor, through its operating subsidiaries, manufactured a wide range of towable and motorized recreational vehicles that were sold to independent dealers primarily in the United States and Canada. On February 1, 2019, the Company and the shareholders of Erwin Hymer Group SE (“EHG”) closed on a transaction via which the Company acquired EHG, one of the largest RV manufacturers in Europe, by revenue. For calendar year 2019, in addition to EHG operations, our recreational vehicle operating subsidiaries include Airstream, Inc., Bison Horse Trailers, LLC dba Bison Coach, Heartland Recreational Vehicles, LLC, Jayco, Inc., KZRV, L.P., Keystone RV Company, and Thor Motor Coach, Inc. Thor is also the sole member of Postle Operating, LLC, a producer of extruded aluminum and specialized components for the recreational vehicle and other industries. For purposes of this report, any reference to products manufactured by or supplied to Thor shall include those products manufactured by and supplied to Thor’s operating subsidiaries.

The majority of Thor’s operating subsidiaries manufacture towable and motorized recreational vehicles. Our subsidiaries’ manufacturing processes mainly consist of the assembly of units and utilize products that may include, but are not limited to, electronics, electronic components, chassis, upholstery, flooring products, wood and wood-based products, adhesives, paint, mirrors, glass, plastic, fiberglass, plumbing components, heating and cooling components, furniture, aluminum, steel, extruded polystyrene, appliances, and other similar products. Postle Operating, LLC’s offerings include aluminum extrusions, powder coating and painting services, and specialized component fabrication and utilize products that may include, but are not limited to, aluminum, paint, steel, and other similar products.

Thor’s marketplace is not dominated by publicly traded entities and, as such, is relatively unsophisticated in matters involving rules issued by the Securities and Exchange Commission. This reality of our supply chain offers additional challenges to the implementation of Thor’s Conflict Minerals program.

In accordance with the Rule, Thor undertook efforts to determine whether the necessary Conflict Minerals in our products were sourced from the Democratic Republic of the Congo (the “DRC”) or an adjoining country. We designed our efforts in conformity with the internationally recognized due diligence framework in the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*² (“OECD Due Diligence Guidance”) and related Supplements.

Thor’s efforts also utilized multi-industry initiatives with the smelters and refiners of minerals who may provide those minerals to companies in Thor’s supply chain. Thor, as a purchaser of component parts, is many steps removed from the smelters and refiners that process minerals and ore. Thor does not purchase raw ore or unrefined

¹ The term “conflict mineral” is defined in Section 1502(e)(4) of the Act as (A) columbite-tantalite, also known as coltan (the metal ore from which tantalum is extracted); cassiterite (the metal ore from which tin is extracted); gold; wolframite (the metal ore from which tungsten is extracted); or their derivatives; or (B) any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo (the “DRC”) or an adjoining country (collectively, the “Conflict Minerals”).

² OECD (2013), *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*: Second Edition, OECD Publishing, <http://www.oecd.org/corporate/mne/GuidanceEdition2.pdf>

Conflict Minerals, and does not purchase directly in the DRC or adjoining countries. As a result, Thor relies on its suppliers to provide origin information on Conflict Minerals contained in components or materials supplied to the Company. Similarly, our direct suppliers may rely on their suppliers for such information.

The statements below are based on the due diligence activities performed to date and in good faith by Thor and are based on the infrastructure and information available at the time of this filing. There are factors that could affect the accuracy of these statements, which factors include, but are not limited to, incomplete supplier data or available smelter data, errors or omissions by suppliers or smelters, evolving definition and confirmation of smelters, incomplete information from industry or other third-party sources, continuing guidance regarding the Rule, and other issues.

II. Reasonable Country of Origin Inquiry

Thor conducted a good faith reasonable country of origin inquiry (“RCOI”) to determine whether Conflict Minerals supplied to our Company originated in the DRC or an adjoining country or were from recycled or scrap sources. However, our ability to determine the origin and chain of custody of Conflict Minerals is limited. While certain of our suppliers were able to identify the countries of origin of the tin, tantalum, tungsten, and/or gold included in the products that they sell to our subsidiaries, our due diligence efforts did not result in sufficient information to conclusively determine all of the countries of origin of the minerals in our products or to conclusively list relevant countries of origin. Based on our due diligence process and the information received, Annex I contains the list of facilities of the smelters and refiners of the tin, tantalum, tungsten and/or gold present in and necessary to the functionality of products manufactured by Thor’s subsidiaries in the year ended December 31, 2019.

Thor collected supplier contact information and products lists from each of its subsidiaries and input such information into a third-party service provider’s platform (“Platform”) once contact information was obtained from relevant vendors. Once information was input into the database, requests for information were sent to vendors who were asked to register with the service provider or in the alternative, provide a current Conflict Minerals Reporting Template (“CMRT”) available from the Responsible Minerals Initiative f/k/a Conflict Free Sourcing Initiative website. When a CMRT was received outside of the Platform, it was uploaded manually to keep all data in the Platform.

III. Due Diligence Measures Performed by Thor

Thor designed its overall Conflict Minerals program based on the five-step framework of the OECD Due Diligence Guidance, the Supplement on Tin, Tantalum, and Tungsten, and the Supplement on Gold.

Step 1: Establish Strong Company Management Systems

As noted above, Thor adopted a Conflict Minerals Policy in addition to establishing a Conflict Minerals team consisting of legal, finance (including purchasing), and information technology members with decision-making authority to manage the data collection, review, and reporting processes, and educated internal team members about Conflict Minerals disclosure requirements. Thor provided its Conflict Minerals Policy and educational materials to our suppliers and the disclosure requirements, as well as recommendations for developing, implementing, and documenting a Conflict Minerals compliance program. Thor engaged Conflict Minerals subject matter experts to assist with the due diligence and reporting process. Thor maintains records relating to its Conflict Minerals program in accordance with the recommended record retention guidelines of five (5) years.

Step 2: Identify and Assess Risks in the Supply Chain

As stated above, Thor engaged in a good-faith RCOI to determine whether the necessary Conflict Minerals originated in the DRC or an adjoining country or were from recycled or scrap sources. With respect to the suppliers that indicated that their products contained Conflict Minerals that originated in the DRC or an adjoining country, Thor verified that the smelters and refiners identified by those suppliers are certified as conflict-free by the Conflict Free Smelter Program established by the EICC/GeSI. With respect to other suppliers, the Company is continuing the process of comparing the identified smelters and refiners with the EICC/GeSi’s list of conflict-free smelters and refiners, beginning with the suppliers whose products the Company determined are most likely to contain Conflict Minerals.

Step 3: Design and Implement a Strategy to Respond to Identified Risks

As part of the risk mitigation process, the Platform compares the smelters/processors collected from vendors to the conflict-free smelter lists published by the EICC/GeSI.

Step 4: Independent Third-Party Audit of Smelters' or Refiners' Due Diligence Practices

Thor is a downstream manufacturer and is many steps removed from smelters and refiners who process minerals and ore. Thor does not purchase raw ore or unrefined Conflict Minerals. Therefore, Thor does not perform or direct audits of smelters and refiners within its supply chain and relies on its third-party service provider to verify the conflict-free status of smelters and refiners that source from the DRC or adjoining countries.

Step 5: Report Findings

This Conflict Minerals Report has been filed with the Securities and Exchange Commission and is publicly available on our website, <http://ir.thorindustries.com>. Thor's Conflict Minerals Policy is also available to the public on our website, <http://ir.thorindustries.com>.

IV. Steps to Improve Due Diligence

We continue to communicate our expectations and information requirements to our vendors. We also continue to monitor changes in circumstances that may impact relevant facts or our determinations. Over time, we anticipate that the amount of information available globally on the traceability and sourcing of covered ores will increase and improve our knowledge. We continue to make inquiries to our vendors and undertake additional risk assessments when potentially relevant changes in facts or circumstances are identified. If we become aware of a vendor that needs improvement in its due diligence process, we intend generally to continue the trade relationship while that vendor improves its compliance program. We expect our vendors to take similar measures with their suppliers to ensure alignment throughout the supply chain.

In addition to the measures described above, the Company will undertake to review and enhance the reporting process as necessary to improve suppliers' ability to accurately respond. We will also seek to improve our own internal supplier identification to improve proficiency in the inquiry and reporting process.

V. Independent Private Sector Audit

Not required for calendar year 2019.

Annex I

| Smelter Name | Metal | Country |
|---|-------|--------------------------|
| 8853 S.p.A. | Gold | ITALY |
| Advanced Chemical Company | Gold | UNITED STATES OF AMERICA |
| Aida Chemical Industries Co., Ltd. | Gold | JAPAN |
| Al Etihad Gold Refinery DMCC | Gold | UNITED ARAB EMIRATES |
| Allgemeine Gold-und Silberscheideanstalt A.G. | Gold | GERMANY |
| Almalyk Mining and Metallurgical Complex (AMMC) | Gold | UZBEKISTAN |
| AngloGold Ashanti Corrego do Sitio Mineracao | Gold | BRAZIL |
| Argor-Heraeus S.A. | Gold | SWITZERLAND |
| Asahi Pretec Corp. | Gold | JAPAN |
| Asahi Refining Canada Ltd. | Gold | CANADA |
| Asahi Refining USA Inc. | Gold | UNITED STATES OF AMERICA |
| Asaka Riken Co., Ltd. | Gold | JAPAN |
| AU Traders and Refiners | Gold | SOUTH AFRICA |
| Aurubis AG | Gold | GERMANY |
| Bangalore Refinery | Gold | INDIA |
| Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | Gold | PHILIPPINES |
| Boliden AB | Gold | SWEDEN |
| C. Hafner GmbH + Co. KG | Gold | GERMANY |
| CCR Refinery - Glencore Canada Corporation | Gold | CANADA |
| Cendres + Metaux S.A. | Gold | SWITZERLAND |
| Chimet S.p.A. | Gold | ITALY |
| Chugai Mining | Gold | JAPAN |
| DODUCO Contacts and Refining GmbH | Gold | GERMANY |
| Dowa | Gold | JAPAN |
| DS PRETECH Co., Ltd. | Gold | KOREA, REPUBLIC OF |
| DSC (Do Sung Corporation) | Gold | KOREA, REPUBLIC OF |
| Eco-System Recycling Co., Ltd. East Plant | Gold | JAPAN |
| Eco-System Recycling Co., Ltd. North Plant | Gold | JAPAN |
| Eco-System Recycling Co., Ltd. West Plant | Gold | JAPAN |
| Emirates Gold DMCC | Gold | UNITED ARAB EMIRATES |
| Geib Refining Corporation | Gold | UNITED STATES OF AMERICA |
| Gold Refinery of Zijin Mining Group Co., Ltd. | Gold | CHINA |
| Heimerle + Meule GmbH | Gold | GERMANY |
| Heraeus Metals Hong Kong Ltd. | Gold | CHINA |
| Heraeus Precious Metals GmbH & Co. KG | Gold | GERMANY |
| Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | Gold | CHINA |
| Ishifuku Metal Industry Co., Ltd. | Gold | JAPAN |
| Istanbul Gold Refinery | Gold | TURKEY |
| Italpreziosi | Gold | ITALY |
| Japan Mint | Gold | JAPAN |

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|---|------|--------------------------|
| Jiangxi Copper Co., Ltd. | Gold | CHINA |
| JSC Uralelectromed | Gold | RUSSIAN FEDERATION |
| JX Nippon Mining & Metals Co., Ltd. | Gold | JAPAN |
| Kazzinc | Gold | KAZAKHSTAN |
| Kennecott Utah Copper LLC | Gold | UNITED STATES OF AMERICA |
| KGHM Polska Miedz Spolka Akcyjna | Gold | POLAND |
| Kojima Chemicals Co., Ltd. | Gold | JAPAN |
| Korea Zinc Co., Ltd. | Gold | KOREA, REPUBLIC OF |
| Kyrgyzaltyn JSC | Gold | KYRGYZSTAN |
| L'Orfebre S.A. | Gold | ANDORRA |
| LS-NIKKO Copper Inc. | Gold | KOREA, REPUBLIC OF |
| LT Metal Ltd. | Gold | KOREA, REPUBLIC OF |
| Marsam Metals | Gold | BRAZIL |
| Materion | Gold | UNITED STATES OF AMERICA |
| Matsuda Sangyo Co., Ltd. | Gold | JAPAN |
| Metalor Technologies (Hong Kong) Ltd. | Gold | CHINA |
| Metalor Technologies (Singapore) Pte., Ltd. | Gold | SINGAPORE |
| Metalor Technologies (Suzhou) Ltd. | Gold | CHINA |
| Metalor Technologies S.A. | Gold | SWITZERLAND |
| Metalor USA Refining Corporation | Gold | UNITED STATES OF AMERICA |
| Metalurgica Met-Mex Penoles S.A. De C.V. | Gold | MEXICO |
| Mitsubishi Materials Corporation | Gold | JAPAN |
| Mitsui Mining and Smelting Co., Ltd. | Gold | JAPAN |
| MMTC-PAMP India Pvt., Ltd. | Gold | INDIA |
| Moscow Special Alloys Processing Plant | Gold | RUSSIAN FEDERATION |
| Nadir Metal Rafineri San. Ve Tic. A.S. | Gold | TURKEY |
| Nihon Material Co., Ltd. | Gold | JAPAN |
| Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH | Gold | AUSTRIA |
| Ohura Precious Metal Industry Co., Ltd. | Gold | JAPAN |
| OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | Gold | RUSSIAN FEDERATION |
| OJSC Novosibirsk Refinery | Gold | RUSSIAN FEDERATION |
| PAMP S.A. | Gold | SWITZERLAND |
| Planta Recuperadora de Metales SpA | Gold | CHILE |
| Prioksky Plant of Non-Ferrous Metals | Gold | RUSSIAN FEDERATION |
| PT Aneka Tambang (Persero) Tbk | Gold | INDONESIA |
| PX Precinox S.A. | Gold | SWITZERLAND |
| Rand Refinery (Pty) Ltd. | Gold | SOUTH AFRICA |
| REMONDIS PMR B.V. | Gold | NETHERLANDS |
| Royal Canadian Mint | Gold | CANADA |
| SAAMP | Gold | FRANCE |
| Safimet S.p.A | Gold | ITALY |
| Samduck Precious Metals | Gold | KOREA, REPUBLIC OF |
| SAXONIA Edelmetalle GmbH | Gold | GERMANY |

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| SEMPA Joyeria Plateria S.A. | Gold | SPAIN |
| Shandong Zhaojin Gold & Silver Refinery Co., Ltd. | Gold | CHINA |
| Sichuan Tianze Precious Metals Co., Ltd. | Gold | CHINA |
| Singway Technology Co., Ltd. | Gold | TAIWAN, PROVINCE OF CHINA |
| SOE Shyolkovsky Factory of Secondary Precious Metals | Gold | RUSSIAN FEDERATION |
| Solar Applied Materials Technology Corp. | Gold | TAIWAN, PROVINCE OF CHINA |
| Sumitomo Metal Mining Co., Ltd. | Gold | JAPAN |
| SungEel HiMetal Co., Ltd. | Gold | KOREA, REPUBLIC OF |
| T.C.A S.p.A | Gold | ITALY |
| Tanaka Kikinzoku Kogyo K.K. | Gold | JAPAN |
| The Refinery of Shandong Gold Mining Co., Ltd. | Gold | CHINA |
| Tokuriki Honten Co., Ltd. | Gold | JAPAN |
| TOO Tau-Ken-Altyn | Gold | KAZAKHSTAN |
| Torecom | Gold | KOREA, REPUBLIC OF |
| Umicore Brasil Ltda. | Gold | BRAZIL |
| Umicore Precious Metals Thailand | Gold | THAILAND |
| Umicore S.A. Business Unit Precious Metals Refining | Gold | BELGIUM |
| United Precious Metal Refining, Inc. | Gold | UNITED STATES OF AMERICA |
| Valcambi S.A. | Gold | SWITZERLAND |
| Western Australian Mint (T/a The Perth Mint) | Gold | AUSTRALIA |
| WIELAND Edelmetalle GmbH | Gold | GERMANY |
| Yamakin Co., Ltd. | Gold | JAPAN |
| Yokohama Metal Co., Ltd. | Gold | JAPAN |
| Zhongyuan Gold Smelter of Zhongjin Gold Corporation | Gold | CHINA |
| Asaka Riken Co., Ltd. | Tantalum | JAPAN |
| Changsha South Tantalum Niobium Co., Ltd. | Tantalum | CHINA |
| D Block Metals, LLC | Tantalum | UNITED STATES OF AMERICA |
| Exotech Inc. | Tantalum | UNITED STATES OF AMERICA |
| F&X Electro-Materials Ltd. | Tantalum | CHINA |
| FIR Metals & Resource Ltd. | Tantalum | CHINA |
| Global Advanced Metals Aizu | Tantalum | JAPAN |
| Global Advanced Metals Boyertown | Tantalum | UNITED STATES OF AMERICA |
| Guangdong Rising Rare Metals-EO Materials Ltd. | Tantalum | CHINA |
| Guangdong Zhiyuan New Material Co., Ltd. | Tantalum | CHINA |
| H.C. Starck Co., Ltd. | Tantalum | THAILAND |
| H.C. Starck Hermsdorf GmbH | Tantalum | GERMANY |
| H.C. Starck Inc. | Tantalum | UNITED STATES OF AMERICA |
| H.C. Starck Ltd. | Tantalum | JAPAN |
| H.C. Starck Smelting GmbH & Co. KG | Tantalum | GERMANY |
| H.C. Starck Tantalum and Niobium GmbH | Tantalum | GERMANY |
| Hengyang King Xing Lifeng New Materials Co., Ltd. | Tantalum | CHINA |
| Jiangxi Dinghai Tantalum & Niobium Co., Ltd. | Tantalum | CHINA |
| Jiangxi Tuohong New Raw Material | Tantalum | CHINA |
| JiuJiang JinXin Nonferrous Metals Co., Ltd. | Tantalum | CHINA |

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| Jiujiang Tanbre Co., Ltd. | Tantalum | CHINA |
| Jiujiang Zhongao Tantalum & Niobium Co., Ltd. | Tantalum | CHINA |
| KEMET Blue Metals | Tantalum | MEXICO |
| KEMET Blue Powder | Tantalum | UNITED STATES OF AMERICA |
| LSM Brasil S.A. | Tantalum | BRAZIL |
| Metallurgical Products India Pvt., Ltd. | Tantalum | INDIA |
| Mineracao Taboca S.A. | Tantalum | BRAZIL |
| Mitsui Mining and Smelting Co., Ltd. | Tantalum | JAPAN |
| Ningxia Orient Tantalum Industry Co., Ltd. | Tantalum | CHINA |
| NPM Silmet AS | Tantalum | ESTONIA |
| PRG Dooel | Tantalum | NORTH MACEDONIA, REPUBLIC OF |
| QuantumClean | Tantalum | UNITED STATES OF AMERICA |
| Resind Industria e Comercio Ltda. | Tantalum | BRAZIL |
| Solikamsk Magnesium Works OAO | Tantalum | RUSSIAN FEDERATION |
| Taki Chemical Co., Ltd. | Tantalum | JAPAN |
| Telex Metals | Tantalum | UNITED STATES OF AMERICA |
| Ulba Metallurgical Plant JSC | Tantalum | KAZAKHSTAN |
| XinXing HaoRong Electronic Material Co., Ltd. | Tantalum | CHINA |
| Yanling Jincheng Tantalum & Niobium Co., Ltd. | Tantalum | CHINA |
| Alpha | Tin | UNITED STATES OF AMERICA |
| Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | Tin | CHINA |
| Chifeng Dajingzi Tin Industry Co., Ltd. | Tin | CHINA |
| China Tin Group Co., Ltd. | Tin | CHINA |
| CV Ayi Jaya | Tin | INDONESIA |
| CV Dua Sekawan | Tin | INDONESIA |
| CV Gita Pesona | Tin | INDONESIA |
| CV United Smelting | Tin | INDONESIA |
| CV Venus Inti Perkasa | Tin | INDONESIA |
| Dowa | Tin | JAPAN |
| EM Vinto | Tin | BOLIVIA (PLURINATIONAL STATE OF) |
| Fenix Metals | Tin | POLAND |
| Gejiu Fengming Metallurgy Chemical Plant | Tin | CHINA |
| Gejiu Kai Meng Industry and Trade LLC | Tin | CHINA |
| Gejiu Non-Ferrous Metal Processing Co., Ltd. | Tin | CHINA |
| Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | Tin | CHINA |
| Gejiu Zili Mining And Metallurgy Co., Ltd. | Tin | CHINA |
| Guangdong Hanhe Non-Ferrous Metal Co., Ltd. | Tin | CHINA |
| Guanyang Guida Nonferrous Metal Smelting Plant | Tin | CHINA |
| HuiChang Hill Tin Industry Co., Ltd. | Tin | CHINA |
| Huichang Jinshunda Tin Co., Ltd. | Tin | CHINA |
| Jiangxi New Nanshan Technology Ltd. | Tin | CHINA |
| Luna Smelter, Ltd. | Tin | RWANDA |
| Ma'anshan Weitai Tin Co., Ltd. | Tin | CHINA |

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| Magnu's Minerais Metais e Ligas Ltda. | Tin | BRAZIL |
| Malaysia Smelting Corporation (MSC) | Tin | MALAYSIA |
| Melt Metais e Ligas S.A. | Tin | BRAZIL |
| Metallic Resources, Inc. | Tin | UNITED STATES OF AMERICA |
| Metallo Belgium N.V. | Tin | BELGIUM |
| Metallo Spain S.L.U. | Tin | SPAIN |
| Mineracao Taboca S.A. | Tin | BRAZIL |
| Minsur | Tin | PERU |
| Mitsubishi Materials Corporation | Tin | JAPAN |
| O.M. Manufacturing (Thailand) Co., Ltd. | Tin | THAILAND |
| O.M. Manufacturing Philippines, Inc. | Tin | PHILIPPINES |
| Operaciones Metalurgicas S.A. | Tin | BOLIVIA (PLURINATIONAL STATE OF) |
| PT Aries Kencana Sejahtera | Tin | INDONESIA |
| PT Artha Cipta Langgeng | Tin | INDONESIA |
| PT ATD Makmur Mandiri Jaya | Tin | INDONESIA |
| PT Babel Inti Perkasa | Tin | INDONESIA |
| PT Babel Surya Alam Lestari | Tin | INDONESIA |
| PT Bangka Prima Tin | Tin | INDONESIA |
| PT Bangka Serumpun | Tin | INDONESIA |
| PT Bangka Tin Industry | Tin | INDONESIA |
| PT Belitung Industri Sejahtera | Tin | INDONESIA |
| PT Bukit Timah | Tin | INDONESIA |
| PT DS Jaya Abadi | Tin | INDONESIA |
| PT Inti Stania Prima | Tin | INDONESIA |
| PT Karimun Mining | Tin | INDONESIA |
| PT Kijang Jaya Mandiri | Tin | INDONESIA |
| PT Lautan Harmonis Sejahtera | Tin | INDONESIA |
| PT Menara Cipta Mulia | Tin | INDONESIA |
| PT Mitra Stania Prima | Tin | INDONESIA |
| PT Panca Mega Persada | Tin | INDONESIA |
| PT Premium Tin Indonesia | Tin | INDONESIA |
| PT Prima Timah Utama | Tin | INDONESIA |
| PT Rajawali Rimba Perkasa | Tin | INDONESIA |
| PT Rajehan Ariq | Tin | INDONESIA |
| PT Refined Bangka Tin | Tin | INDONESIA |
| PT Sariwiguna Binasentosa | Tin | INDONESIA |
| PT Stanindo Inti Perkasa | Tin | INDONESIA |
| PT Sukses Inti Makmur | Tin | INDONESIA |
| PT Sumber Jaya Indah | Tin | INDONESIA |
| PT Timah Tbk Kundur | Tin | INDONESIA |
| PT Timah Tbk Mentok | Tin | INDONESIA |
| PT Tinindo Inter Nusa | Tin | INDONESIA |
| PT Tirus Putra Mandiri | Tin | INDONESIA |
| PT Tommy Utama | Tin | INDONESIA |

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| Resind Industria e Comercio Ltda. | Tin | BRAZIL |
| Rui Da Hung | Tin | TAIWAN, PROVINCE OF CHINA |
| Soft Metais Ltda. | Tin | BRAZIL |
| Thai Nguyen Mining and Metallurgy Co., Ltd. | Tin | VIET NAM |
| Thaisarco | Tin | THAILAND |
| Tin Technology & Refining | Tin | UNITED STATES OF AMERICA |
| White Solder Metalurgia e Mineracao Ltda. | Tin | BRAZIL |
| Yunnan Chengfeng Non-ferrous Metals Co., Ltd. | Tin | CHINA |
| Yunnan Tin Company Limited | Tin | CHINA |
| Yunnan Yunfan Non-ferrous Metals Co., Ltd. | Tin | CHINA |
| A.L.M.T. Corp. | Tungsten | JAPAN |
| ACL Metais Eireli | Tungsten | BRAZIL |
| Asia Tungsten Products Vietnam Ltd. | Tungsten | VIET NAM |
| Chenzhou Diamond Tungsten Products Co., Ltd. | Tungsten | CHINA |
| Chongyi Zhangyuan Tungsten Co., Ltd. | Tungsten | CHINA |
| Fujian Ganmin RareMetal Co., Ltd. | Tungsten | CHINA |
| Fujian Jinxin Tungsten Co., Ltd. | Tungsten | CHINA |
| Ganzhou Haichuang Tungsten Co., Ltd. | Tungsten | CHINA |
| Ganzhou Huaxing Tungsten Products Co., Ltd. | Tungsten | CHINA |
| Ganzhou Jiangwu Ferrotungsten Co., Ltd. | Tungsten | CHINA |
| Ganzhou Seadragon W & Mo Co., Ltd. | Tungsten | CHINA |
| Global Tungsten & Powders Corp. | Tungsten | UNITED STATES OF AMERICA |
| Guangdong Xianglu Tungsten Co., Ltd. | Tungsten | CHINA |
| H.C. Starck Smelting GmbH & Co. KG | Tungsten | GERMANY |
| H.C. Starck Tungsten GmbH | Tungsten | GERMANY |
| Hunan Chenzhou Mining Co., Ltd. | Tungsten | CHINA |
| Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji | Tungsten | CHINA |
| Hunan Chunchang Nonferrous Metals Co., Ltd. | Tungsten | CHINA |
| Hunan Litian Tungsten Industry Co., Ltd. | Tungsten | CHINA |
| Hydrometallurg, JSC | Tungsten | RUSSIAN FEDERATION |
| Japan New Metals Co., Ltd. | Tungsten | JAPAN |
| Jiangwu H.C. Starck Tungsten Products Co., Ltd. | Tungsten | CHINA |
| Jiangxi Gan Bei Tungsten Co., Ltd. | Tungsten | CHINA |
| Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | Tungsten | CHINA |
| Jiangxi Xinsheng Tungsten Industry Co., Ltd. | Tungsten | CHINA |
| Jiangxi Yaosheng Tungsten Co., Ltd. | Tungsten | CHINA |
| Kennametal Fallon | Tungsten | UNITED STATES OF AMERICA |
| Kennametal Huntsville | Tungsten | UNITED STATES OF AMERICA |
| KGETS Co., Ltd. | Tungsten | KOREA, REPUBLIC OF |
| Lianyou Metals Co., Ltd. | Tungsten | TAIWAN, PROVINCE OF CHINA |
| Malipo Haiyu Tungsten Co., Ltd. | Tungsten | CHINA |
| Masan Tungsten Chemical LLC (MTC) | Tungsten | VIET NAM |
| Moliren Ltd. | Tungsten | RUSSIAN FEDERATION |
| Niagara Refining LLC | Tungsten | UNITED STATES OF AMERICA |

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| Philippine Chuangxin Industrial Co., Inc. | Tungsten | PHILIPPINES |
| Tejing (Vietnam) Tungsten Co., Ltd. | Tungsten | VIET NAM |
| Unecha Refractory metals plant | Tungsten | RUSSIAN FEDERATION |
| Wolfram Bergbau und Hutten AG | Tungsten | AUSTRIA |
| Woltech Korea Co., Ltd. | Tungsten | KOREA, REPUBLIC OF |
| Xiamen Tungsten (H.C.) Co., Ltd. | Tungsten | CHINA |
| Xiamen Tungsten Co., Ltd. | Tungsten | CHINA |
| Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd. | Tungsten | CHINA |
| Xinhai Rendan Shaoguan Tungsten Co., Ltd. | Tungsten | CHINA |