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

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**FORM SD**  
SPECIALIZED DISCLOSURE REPORT

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**CAPRI**  
HOLDINGS LIMITED

(Exact name of registrant as specified in its charter)

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**British Virgin Islands**  
(State or other jurisdiction  
of incorporation or organization)

**001-35368**  
(Commission  
File Number)

**N/A**  
(IRS Employer  
Identification No.)

**33 Kingsway**  
**London, United Kingdom**  
(Address of principal executive offices)

**WC2B 6UF**  
(Zip Code)

**Krista A. McDonough**  
**Senior Vice President, General Counsel and Chief Sustainability Officer**  
**(212) 201-8300**

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

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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.

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

As provided for in Rule 13p-1 under the Securities Exchange Act of 1934, as amended, and Form SD, a Conflict Minerals Report is provided as an exhibit to this Form SD and is available on our Internet website at: <http://www.capriholdings.com>.

The information contained on our website is not incorporated by reference into this Form SD or our Conflict Minerals Report and should not be considered part of this Form SD or the Conflict Minerals Report.

**Item 1.02 Exhibit**

The Conflict Minerals Report described in Item 1.01 is filed as Exhibit 1.01 to this Form SD.

**Section 2 – Exhibits****Item 2.01 Exhibits**

Exhibit 1.01 – Conflict Minerals Report for the calendar year ended December 31, 2019.

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**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.

**CAPRI HOLDINGS LIMITED**

(Registrant)

By: /s/ Krista A. McDonough

May 29, 2020

Name: Krista A. McDonough

Title: Senior Vice President, General Counsel and  
Chief Sustainability Officer

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**EXHIBIT INDEX**

| <u>Exhibit</u> | <u>Description</u>   |
|----------------|--|
| 1.01           | <a href="#"><u>Conflict Minerals Report for the calendar year ended December 31, 2019.</u></a> |

## Conflict Minerals Report

Capri Holdings Limited has included this Conflict Minerals Report as an exhibit to its Form SD in respect of the calendar year ended December 31, 2019 (“calendar 2019”) as provided for in Rule 13p-1 under the Securities Exchange Act of 1934, as amended, and Form SD (collectively, the “Conflict Minerals Rule”). The date of filing of this Conflict Minerals Report is May 29, 2020.

Unless the context indicates otherwise, the terms “we,” “its,” “us,” “our” and the “Company” refer to Capri Holdings Limited and its consolidated subsidiaries. As used herein, “Conflict Minerals” or “3TG” are cassiterite (tin), columbite-tantalite (tantalum), gold and wolframite (tungsten), without regard to the location of origin of the minerals or derivative metals.

### Forward-Looking Statements

The statements in this document that refer to plans and expectations for future periods are forward-looking statements within the meaning of federal securities laws. These forward-looking statements are based on management’s current expectations. Words such as “expects,” “anticipates,” “plans,” “believes,” “estimates,” “may,” “will,” “should,” “intends,” “could,” “would,” “might” and variations of such words and similar expressions are intended to identify such forward-looking statements. Examples of forward-looking statements include, but are not limited to, statements concerning the additional steps that we intend to take to mitigate the risk that our necessary 3TG benefit armed groups. You should not place undue reliance on such statements. These forward-looking statements are subject to a number of risks and uncertainties, many of which are beyond the Company’s control, which could cause the Company’s actual results to differ materially from those indicated in these forward-looking statements. These risks and uncertainties may include, but are not limited to, the continued implementation of satisfactory traceability and other compliance measures by our direct and indirect suppliers, on a timely basis or at all, whether smelters and refiners and other market participants responsibly source 3TG, and political, regulatory and economic developments, whether in the Democratic Republic of the Congo (“DRC”) region (the “Covered Countries”), the United States or elsewhere, in each case including in light of the COVID-19 pandemic. The Company undertakes no obligation to update or revise any forward-looking statements to reflect subsequent events or circumstances, except as required by applicable laws or regulations.

### Applicability of the Conflict Minerals Rule to Our Company

We are a global fashion luxury group consisting of iconic brands that are industry leaders in design, style and craftsmanship. Our brands (Versace, Jimmy Choo and Michael Kors) cover the full spectrum of fashion luxury categories including women’s and men’s accessories, footwear and ready-to-wear, wearable technology, watches, jewelry, eyewear and a full line of fragrance products. We believe that we are subject to the Conflict Minerals Rule because some of the products that we contract to manufacture may contain 3TG that are necessary to the functionality or production of such products.

In-scope product information in respect of calendar 2019 is provided under “Product Information” below and includes the Jimmy Choo and Michael Kors brands. Calendar 2019 is the first year in which Jimmy Choo products are considered potentially in-scope for purposes of our Form SD and this Conflict Minerals Report. In December 2018, we completed the acquisition of Gianni Versace S.R.L. and its subsidiaries (“Versace”). Under the Conflict Minerals Rule, we are permitted to exclude Versace products from this Conflict Minerals Report and, accordingly, Versace products are not considered in-scope for purposes of this Conflict Minerals Report.

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Through the efforts described in this Conflict Minerals Report, we seek to ensure that our sourcing practices are consistent with our Conflict Minerals Policy, which is described below. We contracted to manufacture, but did not directly manufacture, products during calendar 2019. We did not directly source 3TG from mines, smelters or refiners during calendar 2019, and are many levels removed from these market participants. The efforts undertaken to identify the origin of 3TG in our products reflect our circumstances and position in the supply chain, and we work with our direct suppliers so that they may provide us with accurate information about the origin of necessary 3TG minerals in the products that we contract to manufacture.

### **Our Conflict Minerals Policy**

We are opposed to human rights abuses such as those that are occurring in connection with the mining of certain minerals from locations in the DRC. We also take our obligations under U.S. Securities and Exchange Commission regulations and the laws in countries in which we operate seriously, including our compliance obligations under the Conflict Minerals Rule. In addition, we are committed to principles of ethical business practice and recognition of the dignity of others, including the responsible sourcing of 3TG, and we expect that our suppliers share this commitment.

In furtherance of the foregoing, we have adopted and communicated to our suppliers and the public a Company policy (the “Conflict Minerals Policy” or “Policy”) for determining the use and origin of 3TG in our supply chain. Our Conflict Minerals Policy is available on our website at: <http://www.capriholdings.com/resources/conflict-minerals/default.aspx>. The information contained on our website is not incorporated by reference into this Conflict Minerals Report or the Form SD and should not be considered part of this Conflict Minerals Report or the Form SD.

The Conflict Minerals Policy includes, but is not limited to, our expectations that our suppliers:

1. put in place procedures for the traceability of 3TG;
2. cooperate with our 3TG due diligence process, including by providing us, from time to time, with written certifications and other information concerning the origin of 3TG included in products and/or components supplied to us;
3. maintain reviewable business records supporting the source of 3TG;
4. adopt policies and procedures with respect to 3TG consistent with our Conflict Minerals Policy and the Organisation for Economic Co-operation and Development’s Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including the Supplement on Tin, Tantalum and Tungsten and the Supplement on Gold (collectively, the “OECD Guidance”), including the adoption of a risk mitigation strategy to respond to identified risks in the supply chain, and communicate such policies and procedures to their personnel, direct suppliers and indirect suppliers; and
5. require their direct and indirect suppliers to adopt policies and procedures that are consistent with our Conflict Minerals Policy.

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We do not support the embargoing of 3TG from the Covered Countries, but rather encourage our suppliers to continue to source responsibly from the region.

In addition, our Code of Conduct for Business Partners (the “Supplier Code of Conduct”) indicates that we encourage our suppliers that use 3TG that are necessary to the functionality or production of products that we manufacture or contract to manufacture, to source product in a socially and environmentally responsible manner and in accordance with our Conflict Minerals Policy. The Supplier Code of Conduct is available on our website at: <http://www.capriholdings.com/resources/supplier-code/default.aspx>.

### **Reasonable Country of Origin Inquiry**

As required by the Conflict Minerals Rule, for calendar 2019, we conducted a “reasonable country of origin inquiry” (“RCOI”). We designed our RCOI in good faith to determine the origin of 3TG that are necessary to the functionality or production of products that we contract to manufacture. The results of our RCOI are discussed in Annex A to this Conflict Minerals Report. To the extent applicable, for our RCOI, we utilized the same processes and procedures as for our due diligence, particularly Steps 1 and 2 of the OECD Guidance design framework, which are described below in this Conflict Minerals Report.

We determined which of our products were in-scope or potentially in-scope for purposes of the Conflict Minerals Rule through product specifications, visual inspection, supplier inquiries and other information known to us. We also considered the degree of influence that we exercised over the materials, parts and components of the products. Our outreach included 264 suppliers that produce in-scope or potentially in-scope products (the “Suppliers”).

Pursuant to the Conflict Minerals Rule, based on the results of our RCOI, we exercised due diligence for calendar 2019. These due diligence efforts are discussed below.

### **Due Diligence Program Design and Execution**

#### *Design Framework*

We designed our due diligence measures relating to 3TG to conform with, in all material respects, the criteria set forth in the OECD Guidance.

#### *Selected Elements of Compliance Program*

The OECD Guidance has established a five-step framework for due diligence as a basis for responsible global supply chain management of minerals from conflict-affected and high-risk areas. Selected elements of our compliance program are discussed below. However, these are not all of the discrete elements of the program that we have put in place to provide for the responsible sourcing of 3TG contained in our products. The headings below conform to the headings used in the OECD Guidance for each of the five steps.

1. *OECD Guidance Step One: “Establish strong company management systems”*
  - a. We have a Conflict Minerals Policy and Supplier Code of Conduct, as described earlier in this Conflict Minerals Report. The Conflict Minerals Policy is communicated internally by email and Intranet. The Conflict Minerals Policy is also communicated to suppliers utilizing our web-based compliance management software and is posted on our website.

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- b. We have a team under the General Counsel and Chief Sustainability Officer charged with managing our 3TG compliance program. The following functional areas are represented on the working group: Global Social Compliance; Production/Licensing; Internal Audit; and Legal. Appropriate members of these functional areas are educated on the Conflict Minerals Rule, the OECD Guidance, our Policy and our compliance program, including the procedures for reviewing and validating supplier responses to our inquiries.
  - c. We have a Standard Operating Procedure that contains standard processes, timelines and communications for our compliance with the Conflict Minerals Rule.
  - d. We utilize the Conflict Minerals Reporting Template (the “CMRT”) developed by the Responsible Minerals Initiative (the “RMI”) to identify smelters and refiners in our supply chain.
  - e. Supplier requests for a completed CMRT are accompanied by the Conflict Minerals Policy or include a link to the Policy.
  - f. We consider on an ongoing basis whether any suppliers may benefit from receiving training or orientation materials concerning the Conflict Minerals Rule, the OECD Guidance, the Conflict Minerals Policy and/or our survey process. If so, we arrange for the relevant supplier(s) to receive those materials and/or recommend training or informational resources to those supplier(s).
  - g. We maintain records relating to 3TG due diligence, including records of our due diligence processes, findings and resulting decisions, in an electronic database. Our policy is to maintain these records for at least five years.
  - h. We have an anonymous email mailbox for employees, suppliers and other interested parties to report violations of our Conflict Minerals Policy. The email address is [conflictmineralscompliance@capriholdings.com](mailto:conflictmineralscompliance@capriholdings.com). We also have a confidential hotline through which parties may report violations. The country-specific hotline telephone numbers are set forth in the Annex to our Code of Business Conduct and Ethics available on our website at <http://www.capriholdings.com/corporate-governance/Code-of-Conduct/default.aspx>. The foregoing serve as our grievance reporting mechanisms.

2. OECD Guidance Step Two: “Identify and assess risk in the supply chain”

- a. We requested through our web-based compliance management software that the Suppliers provide us with information, through the completion of a CMRT, concerning the usage and source of 3TG in their products as well as their related compliance efforts. We sent requests to 264 Suppliers to provide us with a completed CMRT. We followed up by email or phone with all Suppliers that did not respond to the request within the specified time frame. We requested that the

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Suppliers furnish us with a completed template at the product level. We received responses from approximately 70% of the Suppliers. We believe that our Supplier CMRT response rate was lower than in previous years as a result of (1) the impact of the COVID-19 pandemic on the operations of our Suppliers, who are primarily located in the Asia-Pacific region and Italy and temporarily closed due to the pandemic, and (2) the continuing integration of the Jimmy Choo traceability program into our company-wide Conflict Minerals compliance program.

- b. We reviewed the responses received from the Suppliers for completeness, accuracy, reasonableness, credibility and “red flags” using written guidelines that we have developed. We followed up by email or phone with the Suppliers that submitted a response that was rejected under our written guidelines, requesting the Supplier submit an updated or corrected CMRT.
- c. Smelter and refiner information provided by the Suppliers was reviewed against the Smelter Look-up tab list of the CMRT. To the extent that a smelter or refiner identified by a Supplier was not on that list, we took additional steps to attempt to determine whether the listed entity is a smelter or refiner.
- d. Smelter and refiner information provided by the Suppliers also was reviewed against the lists of Conformant and Active (both as later defined) smelters and refiners published by the RMI. To the extent that a smelter or refiner identified by a Supplier was not listed as Conformant by the RMI, we requested further information from the Supplier or consulted publicly available information to determine whether the smelter or refiner obtained 3TG from sources that directly or indirectly financed or benefitted armed groups in a Covered Country.

3. OECD Guidance Step Three: “Design and implement a strategy to respond to identified risks”

- a. Our 3TG compliance team reported the findings of its supply chain risk assessment to our General Counsel and Chief Sustainability Officer.
- b. If our due diligence does not result in a reasonable belief that the applicable 3TG originated outside of the Covered Countries or came from recycled or scrap sources, we assess the risk that the 3TG may benefit armed groups in the Covered Countries.
- c. Under our written procedures, risk mitigation measures include escalation of the supplier inquiry process, working with the supplier to establish a corrective action plan and possible termination of the supplier relationship.
- d. We annually assess whether our 3TG processes conform to our applicable written procedures and assess our compliance program against other specified measures and metrics.

4. OECD Guidance Step Four: “Carry out independent third-party audit of supply chain due diligence at identified points in the supply chain”

To that extent that smelters or refiners of 3TG in our supply chain are identified to us, we utilize and rely on information made available by the RMI concerning independent third-party audits of smelters and refiners to assess smelter and refiner due diligence and to determine whether the smelter or refiner is Conformant.

5. OECD Guidance Step Five: “Report on supply chain due diligence”

We file a Form SD and a Conflict Minerals Report with the U.S. Securities and Exchange Commission and make these documents available on our website.

**Product Information; Identified Smelters and Refiners**

For calendar 2019, the following categories of products that may include tin, tantalum, tungsten and/or gold were potentially in-scope:

- women’s and men’s accessories, including handbags and small leather goods
- footwear
- ready-to-wear, including womenswear, menswear, swimwear and outerwear
- wearable technology
- watches
- jewelry
- eyewear

For a further discussion of our products, see our Annual Report on Form 10-K for the fiscal year ended March 30, 2019 (the “Annual Report”). The information contained in our Annual Report is not incorporated by reference into our Form SD or this Conflict Minerals Report and should not be considered part of this report or the Form SD.

We endeavored to determine the mine or location of origin of the 3TG contained in our in-scope products by requesting that the Suppliers provide us with a completed CMRT at the product level and through the other measures described in this Conflict Minerals Report.

In connection with our RCOI or due diligence, as applicable, the Suppliers identified to us the facilities listed on Annex A as potentially having processed the necessary 3TG contained in our potentially in-scope products for calendar 2019. Due to our position in the supply chain, we rely on the Suppliers for accurate smelter and refiner information. Our due diligence measures cannot provide absolute certainty regarding the source and chain of custody of the necessary 3TG contained in our potentially in-scope products for calendar 2019. Many of the Suppliers provided company level CMRT declarations rather than product level declarations. Therefore, we do not know if the smelters and refiners identified in these declarations relate specifically to products those Suppliers made for us.

Of the 303 smelters and refiners identified to us by our Suppliers, most were identified by a single Supplier that manufactures watches and jewelry for us (including our connected devices). We have not been able to confirm that all of the smelters and refiners identified by this Supplier actually processed the 3TG in our products, and given the large number of identified smelters and refiners, we believe that the smelter and refiner list provided by that Supplier is likely over-inclusive.

Please see the notes accompanying Annex A for additional information relevant to the table below.

|                 | <u>Conformant</u> | <u>Active</u> | <u>On Smelter<br/>Look-up Tab<br/>List Only</u> |
|-----------------|-------------------|---------------|---|
| <b>Tantalum</b> | 38                | 0             | 1   |
| <b>Tin</b>      | 75                | 0             | 9   |
| <b>Tungsten</b> | 40                | 0             | 1   |
| <b>Gold</b>     | 105               | 0             | 34  |

#### **Additional Risk Mitigation Efforts**

We intend to take the following additional steps in respect of the calendar year ending December 31, 2020 (“calendar 2020”) to mitigate the risk that our necessary in-scope 3TG benefit armed groups, to the extent applicable:

1. Encourage Suppliers that provided company level information for calendar 2019 to provide product level information for calendar 2020 through ongoing outreach with these Suppliers.
2. Engage with Suppliers that provided incomplete responses or that did not provide responses for calendar 2019 to provide requested information for calendar 2020.
3. Provide additional materials, informational resources and/or training to selected suppliers.
4. Monitor and encourage the continuing development and progress of traceability measures at Suppliers that indicated for calendar 2019 that the source of 3TG was unknown or undeterminable.
5. Communicate to new potentially in-scope suppliers our sourcing expectations, including through the dissemination of the Conflict Minerals Policy. In addition, as new in-scope suppliers are added, work with these suppliers to ensure that they understand the requirements of our Conflict Minerals Policy, the Conflict Minerals Rule and the OECD Guidance.
6. Continue to integrate the Jimmy Choo and Versace businesses into our 3TG compliance program and, for the first time for calendar 2020, include the Versace business in our Form SD and Conflict Minerals Report.
7. Participate in selected industry initiatives to identify smelters and refiners in our supply chain.

All of the foregoing steps are in addition to the steps that we took in respect of our calendar 2019 inquiry, which we intend to continue to take in respect of our calendar 2020 inquiry to the extent applicable.

**Annex A**

Capitalized terms used and not otherwise defined in this Annex have the meanings indicated in our Conflict Minerals Report.

In connection with our RCOI or due diligence, as applicable, our Suppliers identified to us the smelters and refiners listed below as potentially having processed the necessary 3TG contained in our potentially in-scope products in calendar 2019. As noted earlier in this Conflict Minerals Report, most of the 303 smelters and refiners listed below were identified only by a single Supplier that manufactures watches and jewelry for us (including connected devices).

| <b>Metal</b> | <b>Smelter or Refiner Name</b>                                | <b>Country Location</b>  | <b>Status</b>                     |
|--------------|---|--------------------------|-----------------------------------|
| Gold         | 8853 S.p.A.   | ITALY                    | Conformant                        |
| 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                   | On Smelter<br>Look-up Tab<br>Only |
| Gold         | AU Traders and Refiners                                       | SOUTH AFRICA             | Conformant                        |
| 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         | Caridad   | MEXICO                   | On Smelter<br>Look-up Tab<br>Only |

| <b>Metal</b> | <b>Smelter or Refiner Name</b>                          | <b>Country Location</b>  | <b>Status</b>                     |
|--------------|---|--------------------------|-----------------------------------|
| Gold         | CCR Refinery - Glencore Canada Corporation              | CANADA                   | Conformant                        |
| Gold         | Cendres + Metaux S.A.                                   | SWITZERLAND              | Conformant                        |
| Gold         | Chimet S.p.A.   | ITALY                    | Conformant                        |
| Gold         | Chugai Mining   | JAPAN                    | Conformant                        |
| Gold         | Daejin Indus Co., Ltd.                                  | KOREA, REPUBLIC OF       | On Smelter<br>Look-up Tab<br>Only |
| Gold         | Daye Non-Ferrous Metals Mining Ltd.                     | CHINA                    | On Smelter<br>Look-up Tab<br>Only |
| Gold         | Degussa Sonne / Mond Goldhandel GmbH                    | GERMANY                  | On Smelter<br>Look-up Tab<br>Only |
| Gold         | DODUCO Contacts and Refining GmbH                       | GERMANY                  | Conformant                        |
| Gold         | Dowa  | JAPAN                    | Conformant                        |
| Gold         | DS PRETECH Co., Ltd.                                    | KOREA, REPUBLIC OF       | Conformant                        |
| Gold         | DSC (Do Sung Corporation)                               | KOREA, REPUBLIC OF       | Conformant                        |
| Gold         | Eco-System Recycling Co., Ltd.                          | JAPAN                    | Conformant                        |
| Gold         | Emirates Gold DMCC                                      | UNITED ARAB EMIRATES     | Conformant                        |
| Gold         | GCC Gujrat Gold Centre Pvt. Ltd.                        | INDIA                    | On Smelter<br>Look-up Tab<br>Only |
| Gold         | Geib Refining Corporation                               | UNITED STATES OF AMERICA | Conformant                        |
| Gold         | Gold Refinery of Zijin Mining Group Co., Ltd.           | CHINA                    | Conformant                        |
| Gold         | Great Wall Precious Metals Co., Ltd. of CBPM            | CHINA                    | On Smelter<br>Look-up Tab<br>Only |
| Gold         | Guangdong Jinding Gold Limited                          | CHINA                    | On Smelter<br>Look-up Tab<br>Only |
| Gold         | Guoda Safina High-Tech Environmental Refinery Co., Ltd. | CHINA                    | On Smelter<br>Look-up Tab<br>Only |
| Gold         | Hangzhou Fuchunjiang Smelting Co., Ltd.                 | CHINA                    | On Smelter<br>Look-up Tab<br>Only |
| Gold         | HeeSung Metal Ltd.                                      | KOREA, REPUBLIC OF       | Conformant                        |
| Gold         | Heimerle + Meule GmbH                                   | GERMANY                  | Conformant                        |
| Gold         | Heraeus Metals Hong Kong Ltd.                           | CHINA                    | Conformant                        |
| Gold         | Heraeus Precious Metals GmbH & Co. KG                   | GERMANY                  | Conformant                        |
| Gold         | Hunan Chenzhou Mining Co., Ltd.                         | CHINA                    | On Smelter<br>Look-up Tab<br>Only |

| <b>Metal</b> | <b>Smelter or Refiner Name</b>                                  | <b>Country Location</b>  | <b>Status</b>               |
|--------------|---|--------------------------|-----------------------------|
| Gold         | HwaSeong CJ CO., LTD.   | KOREA, REPUBLIC OF       | On Smelter Look-up Tab Only |
| Gold         | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | CHINA                    | Conformant                  |
| Gold         | Ishifuku Metal Industry Co., Ltd.                               | JAPAN                    | Conformant                  |
| Gold         | Istanbul Gold Refinery  | TURKEY                   | Conformant                  |
| Gold         | Italpreziosi  | ITALY                    | Conformant                  |
| Gold         | Japan Mint  | JAPAN                    | Conformant                  |
| Gold         | Jiangxi Copper Co., Ltd.  | CHINA                    | Conformant                  |
| Gold         | JSC Uralelectromed  | RUSSIAN FEDERATION       | Conformant                  |
| Gold         | JX Nippon Mining & Metals Co., Ltd.                             | JAPAN                    | Conformant                  |
| Gold         | Kazakhmys Smelting LLC  | KAZAKHSTAN               | On Smelter Look-up Tab Only |
| 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         | Kyrgyzaltyn JSC   | KYRGYZSTAN               | Conformant                  |
| Gold         | Kyshtym Copper-Electrolytic Plant ZAO                           | RUSSIAN FEDERATION       | On Smelter Look-up Tab Only |
| Gold         | L'azurde Company For Jewelry                                    | SAUDI ARABIA             | On Smelter Look-up Tab Only |
| Gold         | Lingbao Gold Co., Ltd.  | CHINA                    | On Smelter Look-up Tab Only |
| Gold         | Lingbao Jinyuan Tonghui Refinery Co., Ltd.                      | CHINA                    | On Smelter Look-up Tab Only |
| Gold         | L'Orfebre S.A.  | ANDORRA                  | Conformant                  |
| Gold         | LS-NIKKO Copper Inc.  | KOREA, REPUBLIC OF       | Conformant                  |
| Gold         | Luoyang Zijin Yinhui Gold Refinery Co., Ltd.                    | CHINA                    | On Smelter Look-up Tab Only |
| 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                  |

| <b>Metal</b> | <b>Smelter or Refiner Name</b>  | <b>Country Location</b>  | <b>Status</b>                     |
|--------------|---|--------------------------|-----------------------------------|
| 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         | MMTC-PAMP India Pvt., Ltd.  | INDIA                    | Conformant                        |
| Gold         | Modeltech Sdn Bhd   | MALAYSIA                 | On Smelter<br>Look-up Tab<br>Only |
| Gold         | Morris and Watson   | NEW ZEALAND              | On Smelter<br>Look-up Tab<br>Only |
| Gold         | Morris and Watson Gold Coast  | AUSTRALIA                | On Smelter<br>Look-up Tab<br>Only |
| 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               | On Smelter<br>Look-up Tab<br>Only |
| Gold         | NH Recytech Company   | KOREA, REPUBLIC OF       | On Smelter<br>Look-up Tab<br>Only |
| 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         | OJSC Novosibirsk Refinery   | RUSSIAN FEDERATION       | Conformant                        |
| Gold         | PAMP S.A.   | SWITZERLAND              | Conformant                        |
| Gold         | Pease & Curren  | UNITED STATES OF AMERICA | On Smelter<br>Look-up Tab<br>Only |
| Gold         | Penglai Penggang Gold Industry Co., Ltd.                                    | CHINA                    | On Smelter<br>Look-up Tab<br>Only |
| Gold         | Planta Recuperadora de Metales SpA  | CHILE                    | Conformant                        |

| <b>Metal</b> | <b>Smelter or Refiner Name</b>                          | <b>Country Location</b>   | <b>Status</b>                     |
|--------------|---|---------------------------|-----------------------------------|
| 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         | Rand Refinery (Pty) Ltd.                                | SOUTH AFRICA              | Conformant                        |
| Gold         | Refinery of Seemine Gold Co., Ltd.                      | CHINA                     | On Smelter<br>Look-up Tab<br>Only |
| Gold         | REMONDIS PMR B.V.                                       | NETHERLANDS               | Conformant                        |
| Gold         | Republic Metals Corporation                             | UNITED STATES OF AMERICA  | Not on Smelter<br>Look-up Tab     |
| Gold         | Royal Canadian Mint                                     | CANADA                    | Conformant                        |
| Gold         | SAAMP   | FRANCE                    | Conformant                        |
| Gold         | Sabin Metal Corp.                                       | UNITED STATES OF AMERICA  | On Smelter<br>Look-up Tab<br>Only |
| Gold         | Safimet S.p.A   | ITALY                     | Conformant                        |
| Gold         | Sai Refinery  | INDIA                     | On Smelter<br>Look-up Tab<br>Only |
| Gold         | Samduck Precious Metals                                 | KOREA, REPUBLIC OF        | Conformant                        |
| Gold         | Samwon Metals Corp.                                     | KOREA, REPUBLIC OF        | On Smelter<br>Look-up Tab<br>Only |
| Gold         | SAXONIA Edelmetalle GmbH                                | GERMANY                   | Conformant                        |
| Gold         | Schone Edelmetaal B.V.                                  | NETHERLANDS               | Not on Smelter<br>Look-up Tab     |
| Gold         | SEMPSA Joyeria Plateria S.A.                            | SPAIN                     | Conformant                        |
| Gold         | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | CHINA                     | On Smelter<br>Look-up Tab<br>Only |
| Gold         | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.       | CHINA                     | Conformant                        |
| Gold         | Sichuan Tianze Precious Metals Co., Ltd.                | CHINA                     | Conformant                        |
| Gold         | Singway Technology Co., Ltd.                            | TAIWAN, PROVINCE OF CHINA | Conformant                        |
| Gold         | Smelter not listed                                      | Japan                     | Conformant                        |
| Gold         | SOE Shyolkovsky Factory of Secondary Precious Metals    | RUSSIAN FEDERATION        | Conformant                        |
| Gold         | Solar Applied Materials Technology Corp.                | TAIWAN, PROVINCE OF CHINA | Conformant                        |

| <b>Metal</b> | <b>Smelter or Refiner Name</b>                                       | <b>Country Location</b>  | <b>Status</b>               |
|--------------|--|--------------------------|-----------------------------|
| Gold         | State Research Institute Center for Physical Sciences and Technology | LITHUANIA                | On Smelter Look-up Tab Only |
| 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         | The Refinery of Shandong Gold Mining Co., Ltd.                       | CHINA                    | Conformant                  |
| Gold         | Tokuriki Honten Co., Ltd.  | JAPAN                    | Conformant                  |
| Gold         | Tongling Nonferrous Metals Group Co., Ltd.                           | CHINA                    | On Smelter Look-up Tab Only |
| Gold         | TOO Tau-Ken-Altyn  | KAZAKHSTAN               | Conformant                  |
| Gold         | Torecom  | KOREA, REPUBLIC OF       | Conformant                  |
| Gold         | Umicore Brasil Ltda.   | BRAZIL                   | Conformant                  |
| 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         | Universal Precious Metals Refining Zambia                            | ZAMBIA                   | On Smelter Look-up Tab Only |
| 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                    | On Smelter Look-up Tab Only |
| Gold         | Zhongyuan Gold Smelter of Zhongjin Gold Corporation                  | CHINA                    | Conformant                  |
| Tantalum     | Asaka Riken Co., Ltd.  | JAPAN                    | Conformant                  |
| Tantalum     | Changsha South Tantalum Niobium Co., Ltd.                            | CHINA                    | Conformant                  |
| Tantalum     | D Block Metals, LLC  | UNITED STATES OF AMERICA | Conformant                  |
| Tantalum     | Exotech Inc.   | UNITED STATES OF AMERICA | Conformant                  |

| <b>Metal</b> | <b>Smelter or Refiner Name</b>                    | <b>Country Location</b>  | <b>Status</b>                     |
|--------------|---|--------------------------|-----------------------------------|
| 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     | Guangdong Rising Rare Metals-EO Materials Ltd.    | CHINA                    | Conformant                        |
| Tantalum     | Guangdong Zhiyuan New Material Co., Ltd.          | CHINA                    | Conformant                        |
| Tantalum     | H.C. Starck Co., Ltd.                             | THAILAND                 | Conformant                        |
| Tantalum     | H.C. Starck Hermsdorf GmbH                        | GERMANY                  | Conformant                        |
| Tantalum     | H.C. Starck Inc.                                  | UNITED STATES OF AMERICA | 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     | 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 Janny New Material Co., Ltd.             | CHINA                    | On Smelter<br>Look-up Tab<br>Only |
| 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 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                        |

| <b>Metal</b> | <b>Smelter or Refiner Name</b>  | <b>Country Location</b>                    | <b>Status</b>               |
|--------------|---|--|-----------------------------|
| Tantalum     | Power Resources Ltd.  | MACEDONIA, THE FORMER YUGOSLAV REPUBLIC OF | Conformant                  |
| Tantalum     | QuantumClean  | UNITED STATES OF AMERICA                   | Conformant                  |
| Tantalum     | Resind Industria e Comercio Ltda.   | BRAZIL                                     | Conformant                  |
| Tantalum     | RFH Tantalum Smeltery Co., Ltd./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                  |
| Tantalum     | XinXing HaoRong Electronic Material Co., Ltd.   | CHINA                                      | Conformant                  |
| Tin          | Alpha   | UNITED STATES OF AMERICA                   | Conformant                  |
| Tin          | An Vinh Joint Stock Mineral Processing Company  | VIET NAM                                   | On Smelter Look-up Tab Only |
| Tin          | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.                                     | CHINA                                      | Conformant                  |
| Tin          | Chifeng Dajingzi Tin Industry Co., Ltd.   | CHINA                                      | Conformant                  |
| Tin          | CNMC (Guangxi) PGMA Co., Ltd.   | CHINA                                      | Not on Smelter Look-up Tab  |
| Tin          | CV Ayi Jaya   | INDONESIA                                  | Conformant                  |
| Tin          | CV Dua Sekawan  | INDONESIA                                  | Conformant                  |
| Tin          | CV Gita Pesona  | INDONESIA                                  | Conformant                  |
| Tin          | CV United Smelting  | INDONESIA                                  | Conformant                  |
| Tin          | CV Venus Inti Perkasa   | INDONESIA                                  | Conformant                  |
| Tin          | Dongguan CiEXPO Environmental Engineering Co., Ltd.                                   | CHINA                                      | On Smelter Look-up Tab Only |
| Tin          | Dowa  | JAPAN                                      | Conformant                  |
| Tin          | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | VIET NAM                                   | On Smelter Look-up Tab Only |

| <b>Metal</b> | <b>Smelter or Refiner Name</b>                 | <b>Country Location</b>          | <b>Status</b>               |
|--------------|--|----------------------------------|-----------------------------|
| Tin          | EM Vinto                                       | BOLIVIA (PLURINATIONAL STATE OF) | Conformant                  |
| Tin          | Estanho de Rondonia S.A.                       | BRAZIL                           | On Smelter Look-up Tab Only |
| Tin          | Fenix Metals                                   | POLAND                           | Conformant                  |
| Tin          | Gejiu Fengming Metallurgy Chemical Plant       | CHINA                            | Conformant                  |
| Tin          | Gejiu Jinye Mineral Company                    | CHINA                            | Not on Smelter Look-up Tab  |
| 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          | Guang Xi Liu Zhou                              | 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                            | Not on Smelter Look-up Tab  |
| Tin          | Jiangxi New Nanshan Technology 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                  |

| <b>Metal</b> | <b>Smelter or Refiner Name</b>                   | <b>Country Location</b>          | <b>Status</b>               |
|--------------|--|----------------------------------|-----------------------------|
| Tin          | Modeltech Sdn Bhd                                | MALAYSIA                         | On Smelter Look-up Tab Only |
| Tin          | Nghe Tinh Non-Ferrous Metals Joint Stock Company | VIET NAM                         | On Smelter Look-up Tab Only |
| Tin          | O.M. Manufacturing (Thailand) Co., Ltd.          | THAILAND                         | Conformant                  |
| Tin          | O.M. Manufacturing Philippines, Inc.             | PHILIPPINES                      | Conformant                  |
| Tin          | Operaciones Metalurgicas S.A.                    | BOLIVIA (PLURINATIONAL STATE OF) | Conformant                  |
| Tin          | Pongpipat Company Limited                        | MYANMAR                          | On Smelter Look-up Tab Only |
| 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 Babel Surya Alam Lestari                      | INDONESIA                        | Conformant                  |
| Tin          | PT Bangka Prima Tin                              | INDONESIA                        | Conformant                  |
| Tin          | PT Bangka Serumpun                               | 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                        | Not on Smelter Look-up Tab  |
| Tin          | PT Inti Stania Prima                             | INDONESIA                        | Conformant                  |
| Tin          | PT Karimun Mining                                | INDONESIA                        | Conformant                  |
| Tin          | PT Kijang Jaya Mandiri                           | INDONESIA                        | Conformant                  |
| Tin          | PT Lautan Harmonis Sejahtera                     | INDONESIA                        | Conformant                  |
| Tin          | PT Menara Cipta Mulia                            | INDONESIA                        | Conformant                  |
| Tin          | PT Mitra Stania Prima                            | INDONESIA                        | Conformant                  |
| Tin          | PT Panca Mega Persada                            | INDONESIA                        | Conformant                  |
| Tin          | PT Premium Tin Indonesia                         | INDONESIA                        | Conformant                  |
| 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                  |

| <b>Metal</b> | <b>Smelter or Refiner Name</b>                     | <b>Country Location</b>   | <b>Status</b>                     |
|--------------|--|---------------------------|-----------------------------------|
| Tin          | PT Sariwiguna Binasentosa                          | INDONESIA                 | Conformant                        |
| Tin          | PT Stanindo Inti Perkasa                           | INDONESIA                 | Conformant                        |
| Tin          | PT Sukses Inti Makmur                              | 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          | PT Tirus Putra Mandiri                             | INDONESIA                 | Conformant                        |
| Tin          | PT Tommy Utama                                     | INDONESIA                 | Conformant                        |
| Tin          | Resind Industria e Comercio Ltda.                  | BRAZIL                    | Conformant                        |
| Tin          | Rui Da Hung  | TAIWAN, PROVINCE OF CHINA | Conformant                        |
| Tin          | Soft Metais Ltda.                                  | BRAZIL                    | Conformant                        |
| Tin          | Super Ligas  | BRAZIL                    | On Smelter<br>Look-up Tab<br>Only |
| 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 | VIET NAM                  | On Smelter<br>Look-up Tab<br>Only |
| 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     | ACL Metais Eireli                                  | BRAZIL                    | Conformant                        |
| Tungsten     | Asia Tungsten Products Vietnam Ltd.                | VIET NAM                  | Conformant                        |
| Tungsten     | Chenzhou Diamond Tungsten Products Co., Ltd.       | CHINA                     | Conformant                        |
| Tungsten     | Chongyi Zhangyuan Tungsten Co., Ltd.               | CHINA                     | Conformant                        |
| Tungsten     | Fujian Jinxin Tungsten Co., Ltd.                   | CHINA                     | Conformant                        |
| Tungsten     | Ganzhou Haichuang Tungsten Co., Ltd.               | CHINA                     | Conformant                        |
| Tungsten     | Ganzhou Huaxing Tungsten Products Co., Ltd.        | CHINA                     | Conformant                        |

| <b>Metal</b> | <b>Smelter or Refiner Name</b>                                | <b>Country Location</b>  | <b>Status</b>                 |
|--------------|---|--------------------------|-------------------------------|
| 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 Smelting GmbH & Co. KG                            | GERMANY                  | 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     | 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 Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | CHINA                    | Conformant                    |
| Tungsten     | Jiangxi Xinsheng Tungsten Industry Co., Ltd.                  | CHINA                    | Conformant                    |
| Tungsten     | Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd.          | CHINA                    | Not on Smelter<br>Look-up Tab |
| Tungsten     | Jiangxi Yaosheng Tungsten Co., Ltd.                           | CHINA                    | Conformant                    |
| 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     | Malipo Haiyu Tungsten Co., Ltd.                               | CHINA                    | Conformant                    |

| <b>Metal</b> | <b>Smelter or Refiner Name</b>                               | <b>Country Location</b>  | <b>Status</b>               |
|--------------|--|--------------------------|-----------------------------|
| Tungsten     | Masan Tungsten Chemical LLC (MTC)                            | VIET NAM                 | Conformant                  |
| Tungsten     | Moliren Ltd.   | RUSSIAN FEDERATION       | Conformant                  |
| Tungsten     | Niagara Refining LLC   | UNITED STATES OF AMERICA | Conformant                  |
| Tungsten     | Philippine Chuangxin Industrial Co., Inc.                    | PHILIPPINES              | Conformant                  |
| Tungsten     | South-East Nonferrous Metal Company Limited of Hengyang City | CHINA                    | On Smelter Look-up Tab Only |
| Tungsten     | Tejing (Vietnam) Tungsten Co., Ltd.                          | VIET NAM                 | 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                    | Conformant                  |

We note the following in connection with the information in the table:

- (a) Not all of the included smelters and refiners may have processed the necessary 3TG contained in our in-scope products. Some Suppliers may have reported smelters and refiners that were not in our supply chain due to over-inclusiveness in the information received from their suppliers or for other reasons. In addition, the smelters and refiners reflected above may not include all of the smelters and refiners in our supply chain, since some Suppliers did not identify all of the smelters and refiners used to process the necessary 3TG content contained in our in-scope products and because not all Suppliers responded to our inquiries, as discussed above.
- (b) All information in the table is as of May 21, 2020.
- (c) “Conformant” means that a smelter or refiner has successfully completed an assessment against the applicable Responsible Minerals Assurance Process (“RMAP”) standard or an equivalent cross-recognized assessment. Included smelters and refiners were not necessarily Conformant for all or part of calendar 2019 and may not continue to be Conformant for any future period.
- (d) “Active” means that the smelter or refiner has committed to undergo an RMAP assessment, completed the relevant documents, and scheduled the on-site assessment. These may be in the pre-assessment, assessment, or corrective-action phases of the assessment.
- (e) “On Smelter Look-up Tab List Only” means the smelter or refiner is not listed as “Conformant” or “Active.”

(f) The compliance status reflected in the table is based solely on information made publicly available by the RMI, without independent verification by us.

(g) Country location is the location of the smelter or refiner.

**Country of Origin Information**

The countries of origin of the newly-mined 3TG processed by the Conformant smelters and refiners listed above may include the countries listed below, as well as possibly other countries.

|                                   |             |                  |                          |
|-----------------------------------|-------------|------------------|--------------------------|
| Argentina                         | Finland     | Mongolia         | Solomon Islands          |
| Australia                         | France      | Morocco          | Somaliland               |
| Austria                           | Georgia     | Mozambique       | South Africa             |
| Azerbaijan                        | Germany     | Myanmar          | Spain                    |
| Benin                             | Ghana       | Namibia          | Suriname                 |
| Bolivia                           | Guatemala   | Netherlands      | Swaziland                |
| Botswana                          | Guinea      | New Zealand      | Sweden                   |
| Brazil                            | Guyana      | Nicaragua        | Taiwan                   |
| Burkina Faso                      | Honduras    | Niger            | Tajikistan               |
| Burundi*                          | India       | Nigeria          | Tanzania*                |
| Canada                            | Indonesia   | Papua New Guinea | Thailand                 |
| Chile                             | Ivory Coast | Peru             | Togo                     |
| China                             | Japan       | Philippines      | Turkey                   |
| Colombia                          | Kazakhstan  | Portugal         | Uganda*                  |
| Cyprus                            | Kenya       | Puerto Rico      | United Kingdom           |
| Democratic Republic of the Congo* | Laos        | Russia           | United States of America |
| Dominican Republic                | Liberia     | Rwanda*          | Uruguay                  |
| Ecuador                           | Madagascar  | Saudi Arabia     | Uzbekistan               |
| Egypt                             | Malaysia    | Senegal          | Vietnam                  |

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|          |            |              |          |
|----------|------------|--------------|----------|
| Eritrea  | Mali       | Serbia       | Zambia*  |
| Ethiopia | Mauritania | Sierra Leone | Zimbabwe |
| Fiji     | Mexico     | Slovakia     |          |

\* Represents a Covered Country

In addition, some of the listed Conformant smelters and refiners may have processed 3TG originating from recycled or scrap sources.

For calendar 2019, we were not able to determine the possible countries of origin of the 3TG processed by any of the smelters or refiners listed as “Active” or “On Smelter Look-up Tab List Only.”