

**UNITED STATES**  
**SECURITIES AND EXCHANGE COMMISSION**

**Washington, D.C. 20549**

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**FORM SD**  
**Specialized Disclosure Report**

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**TD SYNnex CORPORATION**

(Exact name of registrant as specified in its charter)

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**Delaware**  
(State or other jurisdiction of  
incorporation or organization)

**001-31892**  
(Commission  
File Number)

**94-2703333**  
(I.R.S. Employer  
Identification No.)

**44201 Nobel Drive**  
**Fremont, California**  
(Address of principal executive offices)

**94538**  
(Zip Code)

**David Vetter**  
**Chief Legal Officer and Corporate Secretary**  
**(727) 538-7062**

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

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

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

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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 at <http://ir.synnex.com/financial-information/sec-filings>. 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 No. | Description   |
|-------------|---|
| 1.01        | <a href="#">Conflict Minerals Report for the calendar year ended December 31, 2021.</a> |

## **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.

TD SYNnex CORPORATION

By: /s/ David Vetter Dated: May 26, 2022

David Vetter  
Chief Legal Officer and Corporate Secretary

## **CONFLICT MINERALS REPORT**

### **OVERVIEW**

This report for the reporting period from January 1, 2021 to December 31, 2021 has been prepared by TD SYNnex Corporation (the “Company,” “we,” “us” or “our”) pursuant to Rule 13p-1 promulgated under the Securities Exchange Act of 1934, as amended, and Form SD (collectively, the “Conflict Minerals Rule”). As used herein and consistent with the Conflict Minerals Rule, “Conflict Minerals” or “3TG” are columbite-tantalite (coltan), cassiterite, gold, wolframite and the derivatives tantalum, tin and tungsten, without regard to the location of origin of the minerals or derivative metals.

We are a leading provider of a comprehensive range of distribution and integration solutions for the technology industry. On September 1, 2021, legacy SYNnex Corporation acquired legacy Tech Data Corporation through a series of two mergers (collectively “Merger”). After completion of the Merger, we changed our corporate name from SYNnex Corporation to TD SYNnex Corporation, effective November 3, 2021.

We distribute PC systems, mobile phones and accessories, printers, peripherals, information technology (“IT”) systems including data center server and storage solutions, system components, software, networking, communications and security equipment, consumer electronics and complementary products. We also provide systems design and integration solutions. Our revenues for 2021 largely were from distribution and business services that were not in-scope for purposes of our compliance with the Conflict Minerals Rule.

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## **PRODUCT SCOPING; REASONABLE COUNTRY OF ORIGIN INQUIRY; DUE DILIGENCE DETERMINATION**

For 2021, a portion of our systems design and integration business involved our manufacture, through assembly or integration, of data center servers and storage products. 3TG were necessary to the functionality or production of these manufactured products. Accordingly, these products were in-scope for purposes of our compliance with the Conflict Minerals Rule. Taken as a whole, our in-scope products contained one or more of 3TG.

We purchase only finished components and do not purchase 3TG directly from any smelter, refiner or mine. We have relationships with an extensive network of suppliers throughout the world, and we believe that there are generally multiple tiers between the mines, smelters, refiners and our direct suppliers. Therefore, we have requested our direct suppliers to work with their upstream suppliers so that they may provide us with information about the origin of 3TG in the components we purchase for inclusion in the products that we manufacture.

To determine whether any of the 3TG in the components contained in our data center servers and storage products originated in the Democratic Republic of the Congo or an adjoining country (the “Covered Countries”), or were from recycled or scrap sources, we conducted a “reasonable country of origin inquiry” (“RCOI”) within the meaning of the Conflict Minerals Rule, requesting that suppliers of the components we included in our manufactured products for 2021 complete the Responsible Minerals Initiative’s (“RMI”) Conflict Minerals Reporting Template (“CMRT”), which includes questions regarding identified smelters and refiners in the supplier’s supply chain and the supplier’s compliance procedures. We determined that requesting that our suppliers complete the CMRT represented our reasonable best efforts to determine the mines or locations of origin of 3TG in our supply chain. Our RCOI utilized the processes and procedures contemplated by Steps 1 and 2 of the OECD Guidance (as defined below). Selected elements of those steps are discussed under “Due Diligence.”

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A majority of the suppliers provided CMRT responses. Of the suppliers that completed CMRTs, the majority provided data at the company level, with a minority reporting at a level specific to the products or category of components that we purchased from them. For the suppliers that responded at the product level, some suppliers indicated that it was unknown if 3TG contained in their products were sourced from the Covered Countries, and some suppliers indicated that their products contain 3TG sourced from the Covered Countries, but those suppliers also indicated that they require their direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program.

After conducting an RCOI and exercising the due diligence described in this Conflict Minerals Report, as applicable, and in light of the limited information specific to our products provided to us by our suppliers, we concluded for 2021 that each of our data center servers and storage products contained 3TG of undetermined origin. Based on the information provided by the suppliers that completed CMRTs, we believe that the facilities used to process necessary 3TG contained in our in-scope products may include the smelters and refiners listed in the Annex at the end of this Conflict Minerals Report; we are not able to determine the countries of origin of the 3TG processed by such smelters and refiners. We endeavored to determine the mine or location of origin of the necessary 3TG contained in our in-scope products by requesting that the suppliers provide us with a completed CMRT and through the other procedures followed by us that are described in this Conflict Minerals Report.

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## DUE DILIGENCE

Our due diligence measures have been designed to conform, in all material respects, with the due diligence framework presented by the Organisation for Economic Co-operation and Development in the publication *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition)*, including the related Supplements for gold and for tin, tantalum and tungsten (the “OECD Guidance”). 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. Our implementation of the OECD Guidance in respect of 2021 is discussed below, but these were not all of the discrete measures that we took in furtherance of our conflict minerals policy (which is discussed below) or pursuant to the Conflict Minerals Rule and the OECD Guidance.

### 1. Establish Strong Company Management Systems

Our 3TG due diligence team was led by our Chief Legal Officer, and our President, Hyve Solutions, and included subject matter experts from legal, finance, supply chain, product management, sales, corporate social responsibility and environmental, social and governance.

We used the CMRT to identify smelters and refiners that were possibly in our supply chain. We maintain business records relating to 3TG due diligence in respect of 2021, including records of due diligence processes, findings and resulting decisions, on a computerized database, and relevant materials are preserved for appropriate periods consistent with the OECD Guidance.

We have a conflict minerals policy, which is available on our website at <https://ir.synnex.com/governance/default.aspx#section=governance-documents> (the “Conflict Minerals Policy”). The Conflict Minerals Policy sets forth our expectation that the suppliers in our supply chain procure 3TG responsibly and avoid sourcing that funds armed conflict contributing to the crisis in the Covered Countries. Our Conflict Minerals Policy also sets forth

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our expectation that our suppliers facilitate our efforts by providing us with appropriate information when we request, and conduct the necessary due diligence to identify smelters and refiners, from which the 3TG in their respective supply chains originate. We have a public email address ([conflictmineralsinquiries@synnex.com](mailto:conflictmineralsinquiries@synnex.com)) available on our website for general inquiries and grievances regarding our 3TG program and sources of 3TG. This mechanism serves as our grievance mechanism.

We do not support the embargo of 3TG from the Covered Countries and other conflict-affected and high-risk regions and are supportive of suppliers continuing to source from responsible sources in those areas.

2. Identify and Assess Risks in the Supply Chain

To determine whether any of the necessary 3TG contained in our in-scope products originated in the Covered Countries, we requested that direct suppliers of the components we used in the in-scope products complete the CMRT. We requested our suppliers' cooperation in gathering information from their respective suppliers.

We reviewed the completed CMRTs received from our suppliers. To the extent that a CMRT identified a smelter or refiner, we reviewed that information against the Smelter Look-up tab list of the CMRT and the list of "Conformant" and "Active" smelters and refiners published by the RMI. We also used the CMRT responses to review our direct suppliers' due diligence activities, such as whether they had a conflict minerals policy and required their own suppliers to source from Conformant sources.

3. Design and Implement a Strategy to Respond to Identified Risks

Senior management was briefed about our due diligence efforts. We have a risk management plan that outlines our responses in general terms to identified risks.

4. Carry Out Third-Party Audit of Supply Chain Due Diligence at Identified Points in the Supply Chain

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In connection with our due diligence, we utilized and relied on information made available by the RMI concerning independent third-party audits of smelters and refiners. We do not have a direct relationship with any smelters or refiners and do not perform or direct audits of those entities within our supply chain.

5. Report on Supply Chain Due Diligence

This Conflict Minerals Report and our Form SD are available on our website and are filed with the Securities and Exchange Commission. Based on the information provided by our suppliers, we believe that the facilities used to process the 3TG in our products may include the smelters and refiners listed in the Annex below.

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## ANNEX

Capitalized terms used and not otherwise defined in this Annex have the meanings set forth in the Conflict Minerals Report of which this Annex is a part.

### Smelters and Refiners <sup>(1)</sup>

The following list includes smelters and refiners in “product” level CMRTs that we received. The list may not include all of the smelters and refiners that processed 3TG in the products that we manufactured for 2021 and may include smelters and refiners that processed 3TG in the general category of components a supplier sells but were not in the individual components we purchased from the supplier, as (i) the list contains only smelters and refiners listed as smelters and refiners by the RMI, (ii) not all of our suppliers completed CMRTs, and (iii) not all of our suppliers confirmed to us that their CMRTs were limited to only the individual components we purchased.

| Mineral | Smelter or Refiner Name                         | Smelter or Refiner Location | Compliance Status                |
|---------|---|-----------------------------|----------------------------------|
| Gold    | 8853 S.p.A.                                     | Italy                       | Conformant                       |
| Gold    | Abington Reldan Metals, LLC                     | United States of America    | Active                           |
| Gold    | Advanced Chemical Company                       | United States of America    | Conformant                       |
| Gold    | African Gold Refinery                           | Uganda                      | On Smelter Look-up Tab List Only |
| Gold    | Agosi AG  | Germany                     | Conformant                       |
| Gold    | Aida Chemical Industries Co., Ltd.              | Japan                       | Conformant                       |
| Gold    | Al Etihad Gold Refinery DMCC                    | United Arab Emirates        | Conformant                       |
| Gold    | Alexy Metals                                    | United States of America    | Active                           |
| Gold    | Almalyk Mining and Metallurgical Complex (AMMC) | Uzbekistan                  | Conformant                       |
| Gold    | AngloGold Ashanti Córrego do Sítio Mineração    | Brazil                      | Conformant                       |
| Gold    | Argor-Heraeus SA                                | 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                       |

| Mineral | Smelter or Refiner Name                                       | Smelter or Refiner Location | Compliance Status                |
|---------|---|-----------------------------|----------------------------------|
| Gold    | Atasay Kuyumculuk Sanayi Ve Ticaret A.S.                      | Turkey                      | On Smelter Look-up Tab List Only |
| Gold    | AU Traders and Refiners                                       | South Africa                | On Smelter Look-up Tab List Only |
| Gold    | Augmont Enterprises Private Limited                           | India                       | Active                           |
| Gold    | Aurubis AG  | Germany                     | Conformant                       |
| Gold    | Bangalore Refinery  | India                       | Conformant                       |
| Gold    | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | Philippines                 | Conformant                       |
| Gold    | Boliden AB  | Sweden                      | Conformant                       |
| Gold    | Caridad   | Mexico                      | On Smelter Look-up Tab List Only |
| Gold    | C. Hafner GmbH + Co. KG                                       | Germany                     | Conformant                       |
| Gold    | C.I Metales Procesados Industriales SAS                       | Colombia                    | Active                           |
| Gold    | CCR Refinery - Glencore Canada Corporation                    | Canada                      | Conformant                       |
| Gold    | Cendres + Metaux S.A.   | Switzerland                 | Conformant                       |
| Gold    | CGR Metalloys Pvt Ltd.  | India                       | On Smelter Look-up Tab List Only |
| Gold    | Chimet S.p.A.   | Italy                       | Conformant                       |
| Gold    | Chugai Mining   | Japan                       | Conformant                       |
| Gold    | Daye Non-Ferrous Metals Mining Ltd.                           | China                       | On Smelter Look-up Tab List Only |
| Gold    | Degussa Sonne/ Mond Goldhandel GmbH                           | Germany                     | On Smelter Look-up Tab List Only |
| Gold    | Dijlah Gold Refinery FZC                                      | United Arab Emirates        | On Smelter Look-up Tab List Only |
| Gold    | DODUCO Contacts and Refining GmbH                             | Germany                     | Conformant                       |
| Gold    | Dowa  | Japan                       | Conformant                       |
| Gold    | DSC (Do Sung Corporation                                      | Republic of Korea           | Conformant                       |
| Gold    | Eco-System Recycling Co., Ltd. East Plant                     | Japan                       | Conformant                       |
| Gold    | Eco -System Recycling Co., Ltd. North Plant                   | Japan                       | Conformant                       |
| Gold    | Eco-System Recycling Co., Ltd. West Plant                     | Japan                       | Conformant                       |
| Gold    | Emirates Gold DMCC  | United Arab Emirates        | Conformant                       |
| Gold    | Fidelity Printers and Refiners Ltd.                           | Zimbabwe                    | On Smelter Look-up Tab List Only |
| Gold    | Fujairah Gold FZC   | United Arab Emirates        | On Smelter Look-up Tab List Only |
| Gold    | GGC Gujrat Gold Centre Pvt. Ltd.                              | India                       | Active                           |
| Gold    | Geib Refining Corporation                                     | United States of America    | Conformant                       |
| Gold    | Gold Refinery of Zijing Mining Group Co., Ltd.                | China                       | Conformant                       |

| Mineral | Smelter or Refiner Name   | Smelter or Refiner Location | Compliance Status                |
|---------|---|-----------------------------|----------------------------------|
| Gold    | Great Wall Precious Metals Co., Ltd. of CBPM                    | China                       | On Smelter Look-up Tab List Only |
| Gold    | Guangdong Jinding Gold Limited                                  | China                       | On Smelter Look-up Tab List Only |
| Gold    | Guoda Safina High-Tech Environmental Refinery Co., Ltd. China   | China                       | On Smelter Look-up Tab List Only |
| Gold    | Hangzhou Fuchunjiang Smelting Co., Ltd.                         | China                       | On Smelter Look-up Tab List Only |
| Gold    | Heimerle + Meule GmbH   | Germany                     | Conformant                       |
| Gold    | Heraeus Germany GmbH Co. KG                                     | Germany                     | Conformant                       |
| Gold    | Heraeus Metals Hong Kong Ltd.                                   | China                       | Conformant                       |
| Gold    | Hunan Chenzhou Mining Co., Ltd.                                 | China                       | On Smelter Look-up Tab List Only |
| Gold    | Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd.             | China                       | On Smelter Look-up Tab List Only |
| Gold    | HwaSeong CJ CO., LTD.   | Republic of Korea           | On Smelter Look-up Tab List Only |
| Gold    | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | China                       | Conformant                       |
| Gold    | International Precious Metal Refiners                           | United Arab Emirates        | On Smelter Look-up Tab List Only |
| Gold    | Ishifuku Metal Industry Co., Ltd.                               | Japan                       | Conformant                       |
| Gold    | Istanbul Gold Refinery  | Turkey                      | Conformant                       |
| Gold    | Italpreziosi  | Italy                       | Conformant                       |
| Gold    | JALAN & Company   | India                       | On Smelter Look-up Tab List Only |
| Gold    | Japan Mint  | Japan                       | Conformant                       |
| Gold    | Jiangxi Copper Co., Ltd.  | China                       | Conformant                       |
| Gold    | JSC Ekaterinburg Non-Ferrous Metal Processing Plant             | Russian Federation          | On Smelter Look-up Tab List Only |
| Gold    | JSC Novosibirsk Refinery  | Russian Federation          | On Smelter Look-up Tab List Only |
| Gold    | JSC Uralelectromed  | Russian Federation          | On Smelter Look-up Tab List Only |
| Gold    | JX Nippon Mining & Metals Co., Ltd.                             | Japan                       | Conformant                       |
| Gold    | Kaloti Precious Metals  | United Arab Emirates        | On Smelter Look-up Tab List Only |
| Gold    | Kazakhmys Smelting LLC  | Kazakhstan                  | On Smelter Look-up Tab List 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.  | Republic of Korea           | Conformant                       |

| Mineral | Smelter or Refiner Name                      | Smelter or Refiner Location | Compliance Status                |
|---------|--|-----------------------------|----------------------------------|
| Gold    | Kyrgyzaltyn JSC                              | Kyrgyzstan                  | On Smelter Look-up Tab List Only |
| Gold    | Kyshtym Copper-Electrolytic Plant ZAO        | Russian Federation          | On Smelter Look-up Tab List Only |
| Gold    | L'azurde Company For Jewelry                 | Saudi Arabia                | On Smelter Look-up Tab List Only |
| Gold    | Lingbao Gold Co., Ltd.                       | China                       | On Smelter Look-up Tab List Only |
| Gold    | Lingbao Jinyuan Tonghui Refinery Co., Ltd.   | China                       | On Smelter Look-up Tab List Only |
| Gold    | L'Orfebre S.A.                               | Andorra                     | Conformant                       |
| Gold    | LS-NIKKO Copper Inc.                         | Republic of Korea           | Conformant                       |
| Gold    | LT Metal Ltd.                                | Republic of Korea           | Conformant                       |
| Gold    | Luoyang Zijin Yinhui Gold Refinery Co., Ltd. | China                       | On Smelter Look-up Tab List Only |
| Gold    | Marsam Metals                                | Brazil                      | Conformant                       |
| Gold    | Materion                                     | United States of America    | Conformant                       |
| Gold    | Matsuda Sangyo Co., Ltd.                     | Japan                       | Conformant                       |
| Gold    | Metal Concentrators SA (Pty) Ltd.            | South Africa                | Conformant                       |
| Gold    | Metalor Technologies (Hong Kong) Ltd.        | China                       | Conformant                       |
| Gold    | Metalor Technologies S.A.                    | Switzerland                 | Conformant                       |
| Gold    | Metalor Technologies (Singapore) Pte., Ltd.  | Singapore                   | Conformant                       |
| Gold    | Metalor Technologies (Suzhou) Ltd.           | China                       | Conformant                       |
| Gold    | Metalor USA Refining Corporation             | United States of America    | Conformant                       |
| Gold    | Metalurgica Met-Mex Penoles S.A. De CV       | Mexico                      | Conformant                       |
| Gold    | Mitsubishi Materials Corporation             | Japan                       | Conformant                       |
| Gold    | Mitsui Mining and Smelting Co., Ltd.         | Japan                       | Conformant                       |
| Gold    | MMTC-PAMP India Pvt., Ltd.                   | India                       | Conformant                       |
| Gold    | Modeltech Sdn Bhd                            | Malaysia                    | On Smelter Look-up Tab List Only |
| Gold    | Morris and Watson                            | New Zealand                 | On Smelter Look-up Tab List Only |
| Gold    | Moscow Special Alloys Processing Plant       | Russian Federation          | On Smelter Look-up Tab List Only |
| Gold    | Nadir Metal Rafineri San. Ve Tic. A.S.       | Turkey                      | Conformant                       |
| Gold    | Navoi Mining and Metallurgical Combinat      | Uzbekistan                  | Conformant                       |
| Gold    | NH Recytech Company                          | Republic of Korea           | Conformant                       |
| Gold    | Nihon Material Co., Ltd.                     | Japan                       | Conformant                       |

| Mineral | Smelter or Refiner Name   | Smelter or Refiner Location | Compliance Status                |
|---------|---|-----------------------------|----------------------------------|
| Gold    | Ögussa Österreichische 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          | On Smelter Look-up Tab List Only |
| Gold    | OJSC Novosibirsk Refinery   | Russian Federation          | On Smelter Look-up Tab List Only |
| Gold    | PAMP S.A.   | Switzerland                 | Conformant                       |
| Gold    | Pease & Curren  | United States of America    | On Smelter Look-up Tab List Only |
| Gold    | Penglai Penggang Gold Industry Co., Ltd.                                    | China                       | On Smelter Look-up Tab List Only |
| Gold    | Planta Recuperadora de Metales SpA  | Chile                       | Conformant                       |
| Gold    | Prioksky Plant of Non-Ferrous Metals  | Russian Federation          | On Smelter Look-up Tab List Only |
| Gold    | PT Aneka Tambang (Persero) Tbk  | Indonesia                   | Conformant                       |
| Gold    | PX Précinox S.A.  | Switzerland                 | Conformant                       |
| Gold    | QG Refining, LLC  | United States of America    | On Smelter Look-up Tab List Only |
| Gold    | Rand Refinery (Pty) Ltd.  | South Africa                | Conformant                       |
| Gold    | Refinery of Seemine Gold Co., Ltd.  | China                       | On Smelter Look-up Tab List Only |
| Gold    | REMONDIS PMR B.V.   | Netherlands                 | Conformant                       |
| Gold    | Royal Canadian Mint   | Canada                      | Conformant                       |
| Gold    | SAAMP   | France                      | Conformant                       |
| Gold    | Sabin Metal Corp.   | United States of America    | On Smelter Look-up Tab List Only |
| Gold    | Safimet S.p.A   | Italy                       | Conformant                       |
| Gold    | SAFINA A.S.   | Czechia                     | Conformant                       |
| Gold    | Sai Refinery  | India                       | On Smelter Look-up Tab List Only |
| Gold    | Samduck Precious Metals   | Republic of Korea           | Conformant                       |
| Gold    | Samwon Metals Corp  | Republic of Korea           | On Smelter Look-up Tab List Only |
| Gold    | Sancus ZFS (L'Orfebre, SA)  | Colombia                    | Active                           |
| Gold    | SAXONIA Edelmetalle GmbH  | Germany                     | On Smelter Look-up Tab List Only |
| Gold    | SEMPSA Joyería Platería S.A.  | Spain                       | Conformant                       |
| Gold    | Shandong Gold Smelting Co., Ltd.  | China                       | Conformant                       |
| Gold    | Shandong Humon Smelting Co., Ltd.   | China                       | On Smelter Look-up Tab List Only |

| Mineral | Smelter or Refiner Name   | Smelter or Refiner Location | Compliance Status                |
|---------|---|-----------------------------|----------------------------------|
| Gold    | Shandong Tiancheng Biological Gold Industrial Co., Ltd.             | China                       | On Smelter Look-up Tab List Only |
| Gold    | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.                   | China                       | Conformant                       |
| Gold    | Shenzhen Zhonghenglong Real Industry Co., Ltd.                      | China                       | On Smelter Look-up Tab List Only |
| Gold    | Sichuan Tianze Precious Metals Co., Ltd.                            | China                       | Conformant                       |
| Gold    | Singway Technology Co., Ltd.  | Taiwan, Province of China   | Conformant                       |
| Gold    | SOE Shyolkovsky Factory of Secondary Precious Metals                | Russian Federation          | On Smelter Look-up Tab List Only |
| Gold    | Solar Applied Materials Technology Corp.                            | Taiwan, Province of China   | Conformant                       |
| Gold    | Sovereign Metals  | India                       | On Smelter Look-up Tab List Only |
| Gold    | State Research Institute Center for Physical Science and Technology | Lithuania                   | On Smelter Look-up Tab List Only |
| Gold    | Sumitomo Metal Mining Co., Ltd.                                     | Japan                       | Conformant                       |
| Gold    | Sudan Gold Refinery   | Sudan                       | On Smelter Look-up Tab List Only |
| Gold    | SungEel HiMetal Co., Ltd.   | Republic of Korea           | Conformant                       |
| Gold    | T.C.A S.p.A   | Italy                       | Conformant                       |
| Gold    | Tanaka Kikinzoku Kogyo K.K.   | Japan                       | Conformant                       |
| Gold    | Tokuriki Honten Co., Ltd.   | Japan                       | Conformant                       |
| Gold    | Tongling Nonferrous Metals Group Co., Ltd.                          | China                       | On Smelter Look-up Tab List Only |
| Gold    | Tony Goetz NV   | Belgium                     | On Smelter Look-up Tab List Only |
| Gold    | TOO Tau-Ken-Altyn   | Kazakhstan                  | Conformant                       |
| Gold    | Torecom   | Republic of Korea           | 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    | Valcambi SA   | Switzerland                 | Conformant                       |
| Gold    | WEEEREFINING  | France                      | Active                           |
| 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 List Only |
| Gold    | Zhongyuan Gold Smelter of Zhongjin Gold Corporation                 | China                       | Conformant                       |

| Mineral  | Smelter or Refiner Name                             | Smelter or Refiner Location  | Compliance Status                |
|----------|---|------------------------------|----------------------------------|
| Tantalum | AMG Brasil  | Brazil                       | 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     | On Smelter Look-up Tab List Only |
| Tantalum | F&X Electro-Materials Ltd.                          | China                        | Conformant                       |
| Tantalum | FIR Metals & Resource Ltd.                          | China                        | Conformant                       |
| Tantalum | Global Advanced Metals Aizu                         | Japan                        | Conformant                       |
| Tantalum | Global Advanced Metals Boyertown                    | United States of America     | Conformant                       |
| Tantalum | H.C. Starck Hermsdorf GmbH                          | Germany                      | Conformant                       |
| Tantalum | H.C. Starck Inc.                                    | United States of America     | Conformant                       |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd.   | China                        | Conformant                       |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd.        | China                        | Conformant                       |
| Tantalum | Jiangxi Tuohong New Raw Material                    | China                        | Conformant                       |
| Tantalum | Jiujiang JinXin Nonferrous Metals Co., Ltd.         | China                        | Conformant                       |
| Tantalum | Jiujiang Tanbre Co., Ltd.                           | China                        | Conformant                       |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd.       | China                        | Conformant                       |
| Tantalum | KEMET de Mexico                                     | Mexico                       | Conformant                       |
| Tantalum | Meta Materials                                      | North Macedonia, Republic Of | Conformant                       |
| Tantalum | Metallurgical Products India Pvt., Ltd.             | India                        | Conformant                       |
| Tantalum | Mineracao Taboca S.A.                               | Brazil                       | Conformant                       |
| Tantalum | Mitsui Mining & Smelting Co., Ltd.                  | Japan                        | Conformant                       |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd.          | China                        | Conformant                       |
| Tantalum | NPM Silmet AS                                       | Estonia                      | Conformant                       |
| Tantalum | QuantumClean  | United States of America     | Conformant                       |
| Tantalum | Resind Industria e Comercio Ltda.                   | Brazil                       | Conformant                       |
| Tantalum | RFH Yancheng Jinye New Material Technology Co., Ltd | China                        | Conformant                       |
| Tantalum | Solikamsk Magnesium Works OAO                       | Russian Federation           | Conformant                       |
| Tantalum | Taki Chemicals Co., Ltd.                            | Japan                        | Conformant                       |
| Tantalum | TANIOBIS Co., Ltd.                                  | Thailand                     | Conformant                       |
| Tantalum | TANIOBIS GmbH                                       | Germany                      | Conformant                       |
| Tantalum | TANIOBIS Japan Co., Ltd.                            | Japan                        | Conformant                       |
| Tantalum | TANIOBIS Smelting GmbH & Co. KG                     | Germany                      | Conformant                       |
| Tantalum | Telex Metals  | United States of America     | Conformant                       |
| Tantalum | Ulba Metallurgical Plant JSC                        | Kazakhstan                   | Conformant                       |



| Mineral  | Smelter or Refiner Name   | Smelter or Refiner Location      | Compliance Status                |
|----------|---|----------------------------------|----------------------------------|
| Tantalum | XIMEI RESOURCES (GUANGDONG) LIMITED   | China                            | Conformant                       |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd.   | China                            | Conformant                       |
| Tantalum | Yanling Jincheng Tantalum & Niobium Co., Ltd.   | China                            | Conformant                       |
| Tin      | Alpha   | United States of America         | Conformant                       |
| Tin      | An Vinh Joint Stock Mineral Processing Company  | Viet Nam                         | On Smelter Look-up Tab List Only |
| Tin      | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.                                     | China                            | Conformant                       |
| Tin      | Chifeng Dajingzi Tin Industry Co., Ltd.   | China                            | Conformant                       |
| Tin      | China Tin Group Co., Ltd.   | China                            | Conformant                       |
| Tin      | CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda          | Brazil                           | Active                           |
| Tin      | CRM Synergies   | Spain                            | Conformant                       |
| Tin      | CV Venus Inti Perkasa   | Indonesia                        | Active                           |
| Tin      | Dongguan CiEXPO Environmental Engineering Co., Ltd.                                   | China                            | On Smelter Look-up Tab List 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 List Only |
| Tin      | EM Vinto  | Bolivia (Plurinational State of) | Conformant                       |
| Tin      | Estanho de Rondonia S.A.  | Brazil                           | Conformant                       |
| Tin      | Fabrica Auricchio Industria e Comercio Ltda.  | Brazil                           | Conformant                       |
| Tin      | Fenix Metals  | Poland                           | Conformant                       |
| Tin      | Gejiu City Fuxiang Industry and Trade Co., Ltd.                                       | China                            | On Smelter Look-up Tab List Only |
| Tin      | Gejiu Kai Meng Industry and Trade LLC   | China                            | On Smelter Look-up Tab List Only |
| Tin      | Gejiu Non-Ferrous Metal Processing Co., Ltd.  | China                            | Conformant                       |
| Tin      | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.  | China                            | Conformant                       |
| Tin      | Gejiu Zili Mining and Metallurgy Co., Ltd.  | China                            | Conformant                       |
| Tin      | Guangdong Hanhe Non-Ferrous Metal Co., Ltd.   | China                            | Conformant                       |
| Tin      | HuiChang Hill Tin Industry Co., Ltd.  | China                            | Conformant                       |
| Tin      | Jiangxi New Nanshan Technology Ltd.   | China                            | Conformant                       |
| Tin      | Luna Smelter, Ltd.  | Rwanda                           | Conformant                       |
| Tin      | Magnu's Minerais Metais e Ligas Ltda.   | Brazil                           | Conformant                       |
| Tin      | Malaysia Smelting Corporation (MSC)   | Malaysia                         | Conformant                       |
| Tin      | Ma'anshan Weitai Tin Co., Ltd.  | China                            | Conformant                       |

| Mineral | Smelter or Refiner Name                          | Smelter or Refiner Location      | Compliance Status                |
|---------|--|----------------------------------|----------------------------------|
| Tin     | Melt Metais e Ligas S.A.                         | Brazil                           | On Smelter Look-up Tab List Only |
| Tin     | Metallic Resources, Inc.                         | United States of America         | Conformant                       |
| Tin     | Metallo Belgium N.V.                             | Belgium                          | Conformant                       |
| Tin     | Metallo Spain S.L.U.                             | Spain                            | Conformant                       |
| Tin     | Mineracao Taboca S.A.                            | Brazil                           | Conformant                       |
| Tin     | Minsur   | Peru                             | Conformant                       |
| Tin     | Mitsubishi Materials Corporation                 | Japan                            | Conformant                       |
| Tin     | Modeltech Sdn Bhd                                | Malaysia                         | On Smelter Look-up Tab List Only |
| Tin     | Nghe Tinh Non-Ferrous Metals Joint Stock Company | Viet Nam                         | On Smelter Look-up Tab List Only |
| Tin     | Novosibirsk Processing Plant Ltd.                | Russian Federation               | Conformant                       |
| 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 List Only |
| Tin     | Precious Minerals and Smelting Limited           | India                            | On Smelter Look-up Tab List Only |
| Tin     | PT ATD Makmur Mandiri Jaya                       | Indonesia                        | Conformant                       |
| Tin     | PT Artha Cipta Langgeng                          | Indonesia                        | Conformant                       |
| Tin     | PT Aries Kencana Sejahtera                       | Indonesia                        | Active                           |
| Tin     | PT Babel Inti Perkasa                            | Indonesia                        | Conformant                       |
| Tin     | PT Babel Surya Alam Lestari                      | Indonesia                        | Conformant                       |
| Tin     | PT Bangka Serumpun                               | Indonesia                        | Conformant                       |
| Tin     | PT Belitung Industri Sejahtera                   | Indonesia                        | On Smelter Look-up Tab List Only |
| Tin     | PT Bukit Timah                                   | Indonesia                        | Conformant                       |
| Tin     | PT Cipta Persada Mulia                           | Indonesia                        | Conformant                       |
| Tin     | PT Menara Cipta Mulia                            | Indonesia                        | Conformant                       |
| Tin     | PT Mitra Stania Prima                            | Indonesia                        | Conformant                       |
| Tin     | PT Mitra Sukses Globalindo                       | Indonesia                        | Active                           |
| Tin     | PT Panca Mega Persada                            | Indonesia                        | On Smelter Look-up Tab List Only |
| 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                       |

| Mineral  | Smelter or Refiner Name                                    | Smelter or Refiner Location | Compliance Status                |
|----------|--|-----------------------------|----------------------------------|
| Tin      | PT Sariwiguna Binasentosa                                  | Indonesia                   | Conformant                       |
| Tin      | PT Stanindo Inti Perkasa                                   | Indonesia                   | Conformant                       |
| Tin      | PT Sukses Inti Makmur                                      | Indonesia                   | Active                           |
| Tin      | PT Timah Nusantara   | Indonesia                   | Active                           |
| 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                   | On Smelter Look-up Tab List Only |
| Tin      | PT Tommy Utama   | Indonesia                   | On Smelter Look-up Tab List Only |
| Tin      | Resind Indústria e Comércio Ltda.                          | Brazil                      | Conformant                       |
| Tin      | Rui Da Hung  | Taiwan, Province of China   | Conformant                       |
| Tin      | Soft Metais Ltda.  | Brazil                      | Conformant                       |
| Tin      | Super Ligas  | Brazil                      | Active                           |
| Tin      | Thaisarco  | Thailand                    | Conformant                       |
| Tin      | Thai Nguyen Mining and Metallurgy Co., Ltd.                | Viet Nam                    | Conformant                       |
| Tin      | Tin Smelting Branch of Yunnan Tin Co., Ltd.                | China                       | Conformant                       |
| Tin      | Tin Technology & Refining                                  | United States of America    | Conformant                       |
| Tin      | Tuyen Quang Non-Ferrous Metals Joint Stock Company         | Viet Nam                    | On Smelter Look-up Tab List Only |
| Tin      | White Solder Metalurgia e Mineração Ltda.                  | Brazil                      | Conformant                       |
| Tin      | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.              | China                       | Conformant                       |
| Tin      | Yunnan Yunfan Non-ferrous Metals Co., Ltd.                 | China                       | On Smelter Look-up Tab List Only |
| Tungsten | Albasteel Industria e Comercio de Ligas Para Fundicao Ltd. | Brazil                      | Active                           |
| Tungsten | ACL Metais Eireli  | Brazil                      | Conformant                       |
| Tungsten | A.L.M.T. Corp.   | Japan                       | Conformant                       |
| Tungsten | Asia Tungsten Products Vietnam Ltd.                        | Viet Nam                    | Conformant                       |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd.               | China                       | On Smelter Look-up Tab List Only |
| Tungsten | China Molybdenum Tungsten Co., Ltd.                        | China                       | Conformant                       |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd.                       | China                       | Conformant                       |
| Tungsten | CNMC (Guangxi) PGMA Co., Ltd.                              | China                       | On Smelter Look-up Tab List Only |
| Tungsten | Cronimet Brasil Ltda                                       | Brazil                      | Conformant                       |
| Tungsten | Fujian Ganmin RareMetal Co., Ltd.                          | China                       | Conformant                       |
| Tungsten | Fujian Xinlu Tungsten Co., Ltd.                            | China                       | Conformant                       |
| Tungsten | Ganzhou Haichuang Tungsten Co., Ltd.                       | China                       | Conformant                       |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd.                | China                       | Conformant                       |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd.                    | China                       | Conformant                       |

| Mineral  | Smelter or Refiner Name                                       | Smelter or Refiner Location | Compliance Status                |
|----------|---|-----------------------------|----------------------------------|
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd.                            | China                       | Conformant                       |
| Tungsten | Global Tungsten & Powders Corp.                               | United States of America    | Conformant                       |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd.                          | China                       | Conformant                       |
| Tungsten | H.C. Starck Tungsten GmbH                                     | Germany                     | Conformant                       |
| Tungsten | Hubei Green Tungsten Co., Ltd.                                | China                       | Conformant                       |
| Tungsten | Hunan Chenzhou Mining Co., Ltd.                               | 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 Minmetals Gao'an Non-ferrous Metals Co., Ltd.         | China                       | On Smelter Look-up Tab List Only |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | China                       | Conformant                       |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd.                  | China                       | Conformant                       |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd.                           | China                       | Conformant                       |
| Tungsten | JSC "Kirovgrad Hard Alloys Plant"                             | Russian Federation          | Conformant                       |
| Tungsten | Kennametal Fallon   | United States of America    | Conformant                       |
| Tungsten | Kennametal Huntsville   | United States of America    | Conformant                       |
| Tungsten | KGETS Co., Ltd.   | Republic of Korea           | Conformant                       |
| Tungsten | Lianyou Metals Co., Ltd.                                      | Taiwan, Province of China   | Conformant                       |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd.                               | China                       | Conformant                       |
| Tungsten | Masan High-Tech Materials                                     | Viet Nam                    | Conformant                       |
| Tungsten | Moliren Ltd.  | Russian Federation          | Conformant                       |
| Tungsten | Niagara Refining LLC  | United States of America    | Conformant                       |
| Tungsten | NPP Tyazhmetprom LLC  | Russian Federation          | Active                           |
| Tungsten | OOO "Technolom" 1   | Russian Federation          | Active                           |
| Tungsten | OOO "Technolom" 2   | Russian Federation          | Active                           |
| Tungsten | Philippine Chuangxin Industrial Co., Inc.                     | Philippines                 | Conformant                       |
| Tungsten | TANIOBIS Smelting GmbH & Co. KG                               | Germany                     | Conformant                       |
| Tungsten | Unecha Refractory metals plant                                | Russian Federation          | Conformant                       |
| Tungsten | Wolfram Bergbau und Hütten AG                                 | Austria                     | Conformant                       |
| Tungsten | Woltech Korea Co., Ltd.                                       | Republic of Korea           | 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                       |

(1) We note the following in connection with the information contained in the foregoing table:

- (a) All compliance status information in the table is based on information made publicly available by the RMI as of May 6, 2022.
- (b) “Conformant” means that a smelter or refiner has successfully completed an assessment against the applicable Responsible Minerals Assurance Process (the “RMAP”) standard or an equivalent cross-recognized assessment. Included smelters and refiners were not necessarily Conformant for all or part of 2021 and may not continue to be Conformant for any future period.
- (c) “Active” is a RMAP designation that 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.
- (d) “On Smelter Look-up Tab List Only” means that a smelter or refiner is listed on the Smelter Look-up tab list of the CMRT, but is not listed as “Conformant” or “Active.”
- (e) The compliance status and smelter and refiner location indicated in the table is based solely on information made publicly available by the RMI, without independent verification by us.