
Arçelik

**Conflict Minerals
Due Diligence
Report 2021**

About this Report and Arçelik Due Diligence

Section 1502 of the Dodd Frank Act was enacted to address the exploitation and trade of 3TG by armed groups, which is partially financing conflict in the Democratic Republic of Congo (DRC) and adjacent countries to a humanitarian crisis. It requires that companies it applies to determine and report country origin of conflict minerals whether any of the 3TG used in their products are financing or benefiting illegal armed groups in the DRC or an adjoining country.

The term “3TG” or “conflict minerals” means columbite-tantalite (coltan), cassiterite, gold, wolframite or their derivatives; or any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the DRC or adjoining country.

A similar law called EU Conflict Minerals Regulation was accepted in the European Union that requires importers of 3TGs to report the presence and country origin of conflict minerals. Downstream companies are companies that sell the product to other businesses like Arçelik are not required to comply with mandatory rules on due diligence according to EU regulation.

Due to its vision “Respecting the World, Respected Worldwide”, Arçelik is leading sustainability in its sector. As part of Arçelik’s commitment to maintaining the highest ethical, labor and environmental standards among its suppliers, Arçelik has adopted the policy on responsible sourcing of minerals from conflict-affected and high-risk areas. In line its vision, Arçelik has published ‘Conflict Mineral Policy’ in 2019 and in order to comply mentioned act, “Conflict Minerals Management Procedure” has published in 2019 as CP-16492/0. (Please check for conflict mineral policy (<https://www.arcelikglobal.com/en/sustainability/policies/policies/>)) Arçelik has started a membership since 2021 with RMI (Responsible Minerals Initiative) to achieve its vision and manage supply chain for responsible purchasing.

The Organisation for Economic Co-operation and Development (OECD) leads to Arçelik due diligence and responsible purchasing process which states in CP-16492/0. Arçelik is not actively purchasing any conflict minerals. As part of responsible purchasing process, Arçelik has communicated with its 1st tier suppliers and asked for implementation of conflict minerals.

This report describes Arçelik supply chain due diligence performance for conflict minerals. The results were collected for 2021 and reporting period January 1, 2021 to December 31, 2021 as first conflict mineral due diligence report of Arçelik.

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Arçelik

Abbreviations and Definitions

3TG	:Columbite-tantalite (coltan), cassiterite, gold, wolframite or their derivatives
CMRT	:Conflict minerals reporting template
EMRT	:Extended Minerals Reporting Template
DRC	:Democratic Republic of Congo
CAHRA	:Conflict affected or high risk areas
OECD	:The Organisation for Economic Co-operation and Development
RMAP	:Responsible Minerals Assurance Process
RCOI	:Reasonable Country of Origin Inquiry
RMI	:Responsible Minerals Initiative
SOR	:Smelters or Refiners
QA	:Quality Assurance
LBMA	:The London Bullion Market Association
RJC	:The Responsible Jewellery Council

Summary of Report

Arçelik is a white good manufacturer which has 28 production facilities in 9 countries. Arçelik manufactures and markets a full line of major home appliances and related products. Our principal products are refrigerators and freezers, washing machines and dryers, cooking appliances, dishwashers, TVs and small appliances.

Tin, Tungsten, Tantalum and Gold (3TG) are used in the manufacturing of electronics, home appliances and other products. As a producer for home appliances and electronics, we surveyed 724 of Arçelik first tier suppliers which have potential to use 3TGs in parts. Arçelik has shared a conflict minerals reporting template (CMRT) to these suppliers to gather information about their due diligence and smelters or refiners (SORs). The CMRT is a free, standardized reporting template that facilitates the transfer of information through the supply chain regarding mineral country of origin and smelters and refiners being utilized.

A response rate is 76 % which means 550 of 724 suppliers filled out survey. 60% of responding suppliers indicated that they had no 3TGs in their parts or products supplied to Arçelik. About 97% of responding suppliers, indicated that they either have no 3TGs in parts or they have 3TGs that pose no conflict concerns.

The suppliers which answered the inquiry shared 304 smelters or refiners with Arçelik. 13 of them no longer operational. 220 of them have been conformant and certified as “DRC – conflict free” by the responsible minerals assurance process (RMAP) on behalf of the global organization Responsible Minerals Initiative. (RMI)

7 of them are active smelters or refiners (SORs) means smelters and refiners that have 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. They may accept as conformant according to RMI.

The other 64 SORs are not certified and 63 of them are out of conflict area, 1 of them are in conflict affected or high risk areas where is Uganda (African Gold Refinery). 13 suppliers which sent part or products were classified as high risk suppliers. Arçelik will take actions by removing non-certified smelters from supply chain with implementing a risk based approaching.

Arçelik Due Diligence Procedure for Conflict Minerals and Responsible Purchasing

Arçelik is implementing and following OECD Due Diligence Guidance for Responsible Supply Chains for creating procedure on conflict mineral due diligence and responsible purchasing. Arçelik integrated into its own management systems the following five-step framework for risk-based due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas:

Step 1

Establish strong company management systems

- In order to facilitate clear communication with suppliers, Arçelik has created and published a Conflict Mineral Policy in its website <https://www.arcelikglobal.com/en/sustainability/policies/policies/>.
- Arçelik suppliers are informed that they need to ensure parts or products to Arçelik with working conflict free sub supplier which not directly or indirectly finance perpetrators of human right abuses in CAHRAs.
- In 2019, Arçelik established a robust team for managing conflict minerals due diligence with the contribution of members from Central Environment Department, Purchasing Directorate and Product Directorates (domestic and abroad).

Step 2

Identify and assess risk in the supply chain.

- Arçelik determines risky parts as gold used in circuit boards and electronic components, tungsten used in coatings and certain alloys, tin used in alloys, fasteners and special glasses, tantalum used in capacitors and certain alloys and other risk categories as solders, thermostats, heating elements, electron emitters, diodes and connectors.
- Arçelik contacts with all suppliers which are risky for using 3TGs and conducts Reasonable Country of Origin Inquiry (RCOI) to determine whether any of the 3TG element originated from conflict affected or high risk areas. (CAHRA)
- The inquiry was conducted by using conflict minerals reporting template (CMRT which is version 6.1 April 28, 2021). The results were collected and stored by a 3rd party consulting firm.
- Arçelik is a RMI (Responsible Minerals Initiative) member. RMI identifies smelters and refiners that produce responsibly sourced materials through RMAP. Arçelik uses RMI tools to transfer the information through supply chain regarding mineral country of origin and smelters and refiners being utilized.

Step 3

Design and implement strategy to respond to identified risks

- The analysis and reporting has done by Environmental Management Team.
- The main parameters are determining smelters or refiners of Arçelik 1st tier suppliers and mapping the possible risks.

Step 4

Perform independent 3rd party audit of chain due diligence

- Up to now, Arçelik didn't conduct any audit by itself or a notified body. According to survey results, it may be realised to manage and mitigate the risk.

Step 5

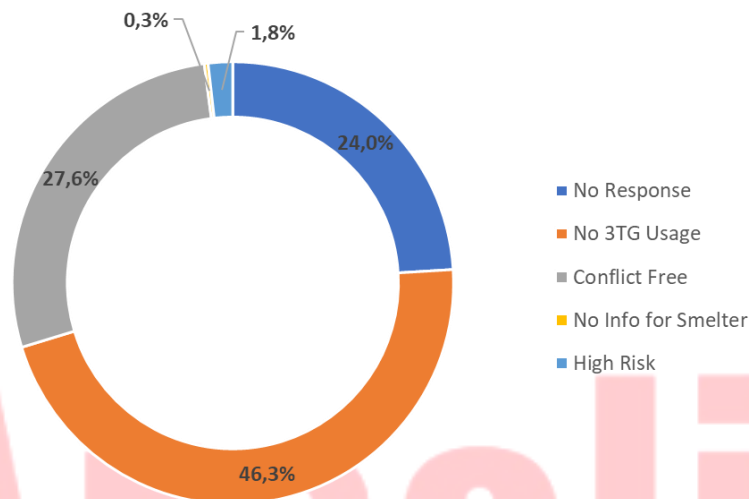
Report on supply chain due diligence.

- Arçelik has started reporting annually on conflict mineral due diligence.

Results of Inquiry – Supplier Case

Totally 724 suppliers found that related with 3TG as an pre-assumption. The notified body was conducted each supplier by using software, e-mails and telephone call. The results are shown in pie charts. The response rate is %76 (550 suppliers).

ANALYSIS OF RESPONSES, BY SUPPLIER NUMBER



No Response : Supplier did not respond notified body inquiry request, e-mail and telephone call. (174 suppliers)

No 3TG Usage: Supplier stated that no usage of 3TGs in their parts, components or product to send Arçelik plants. (335 suppliers)

Conflict Free: Suppliers which provided all 3TGs by conformant SORs or not within conflict area. (200 suppliers)

No Info for Smelter: Suppliers couldnt share SOR information due to missing knowledge. (2 suppliers)

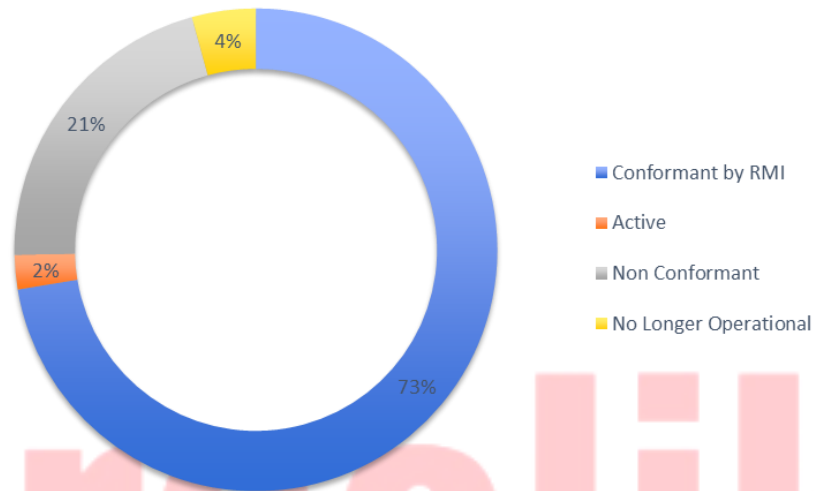
High Risk: Suppliers has one or more SORs which present at DRC or adjoining countries that not certified by RMI. (13 suppliers)

Survey responses showed us 13 suppliers working with non certified SOR (gold refinery) which located in Uganda. (Uganda is one of DRC adjoining countries and accepted as in conflict affected and high risk areas) Arçelik has requested from these suppliers to investigate their supply chains to determine whether any gold supplied by the uncertified refinery was obtained from any sources in a relationship with armed conflict in conflict area.

Results of Inquiry – Smelters or Refiners Case

The responding suppliers have shared 304 smelters in CMRT but 13 of them no longer operational. The follow chart has shown details.

ANALYSIS OF RESPONSES, BY SOR NUMBER



304 smelters were detected after analyzing of survey results. 13 of them are no longer operational. 220 of them are conformant SORs and 7 of them active that this SORs may be accept as conformant SORs according to RMI.

64 of smelters or refiners dont have conformant certification from RMI and their mineral countries origin are Belgium, Brazil, China Germany, Ghana, India, Kazakhstan, South Korea, Kyrgyzstan, Lithuania, Malaysia, Mexico, Myanmar, New Zealand, Russia, Saudi Arabia, South Africa, Sudan, Turkey, Uganda, UAE, USA, Vietnam and Zimbabwe.

Except Uganda, the other countries are out of conflict affected areas. 63 SORs are out of conflict affected areas. All smelter and refiners are identified in table Annex A. (List of Smelters and Refiners) The whole RCOI (Country of Origin Data) can be seen in Annex B table. (Country of Origin Information)

Improvements and Risk Mitigation Activities

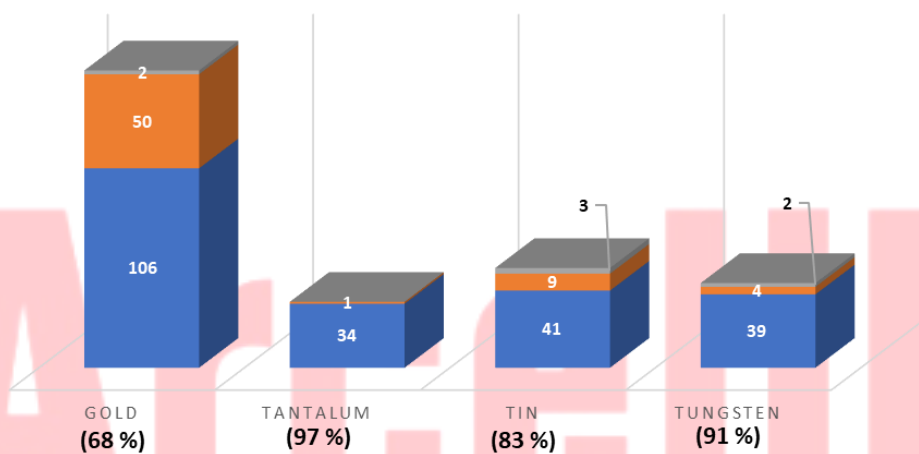
Arçelik prevents or mitigates the identified risks by adopting and implementing a risk management plan. It will result in a decision to continue trade throughout the course of risk mitigation efforts.

All SORs are analyzed and below chart was prepared by metal.

2021 RMI STATUS OF SOR'S BY METAL

BASED ON INFORMATION CMRT 6.1 (APRIL 28, 2021)

■ Conformant ■ Non Conformant ■ Active



According to Arçelik improvement and risk mitigation plan, we conducted 3 level action plan:

Level 1 Actions: Urgent Actions

Disengage with the SORs which are non-conformant and located in DRC or adjoining countries, urgently.

Level 2 Actions: These actions have started and it is planning to finish end of 2022

Disengage with the SORs which are non-conformant and have risks in 'extreme' and 'high' classifications according to RMI score cards. These SORs are going to remove from supply chain of Arçelik up to 2022.

Level 3 Actions: These actions have started and it is planning to finish end of 2023. Disengage with the SORs which are non-conformant and have risks in 'medium' and 'low' classifications according to RMI score cards. These SORs are going to remove from supply chain of Arçelik up to 2023.

RMI country risk score cards inform risks on the topics of conflict, governance, and human rights. Each pillar has an aggregated index that is comprised from credible public domain data sources to inform overall risk at country level for mining businesses. The overall index for each pillar is calculated using the below algorithm,

$$\text{Overall Index} = [(SCon) \times (WCon)] + [(SGov) \times (WGov)] + [(SHR) \times (WHR)]$$

Where SCon = Conflict risk score

WCon = Weighting for Conflict risk score

SGov = Governance risk score

WGov = Weighting for Governance risk score

SHR = Human rights risk score

WHR = Weighting for Human rights risk score

All risk scores are on a 0-10 scale and the scores are categorized into four equal risk bands. The risk scores closer to 0 are considered extremely risky and scores closer to 10 are considered low risk. The risk band categories, associated range, and number of countries are tabulated below:

Risk Bands	Min Score	Max Score
EXTREME	0.00	2.49
HIGH	2.50	4.99
MEDIUM	5.00	7.49
LOW	7.50	10.0

Note: The all non-conformant SORs' risk scores states in AnnexA remark section.

All SORs information were gathered from CMRT was analyzed and breakdown was prepared like below table. 1 of the SORs is in DRC or adjoining country and it will be removing from supply chain as an urgent action. 54 of them are in extreme-high risk bands and they will remove supply chain up to end off 2022. 24 of them are in medium-low risk band and they will remove from supply chain up to end of 2023.

SOR Quantity acc. to Risk Bands					
Urgent	Extreme	High	Medium	Low	Total
Level-1	Level - 2	Level - 2	Level - 3	Level - 3	
1	2	44	14	3	64

Quality Assurance

Supplier responses were evaluated for plausibility, consistency and gaps by the notified consultant firm that provides sending surveys to suppliers via application, collects data and storage. The determined personnel in the firm had controlled each of the survey data one by one and detail. Any of following irrationality was observed, the related person directly contacted with supplier for correction.

- One or more smelter SORs were listed for unused metal
- SOR information was not provided for a used metal, or SOR information provided was not a verified metal processor
- Supplier answered “yes” to sourcing from the DRC or adjoining countries, but none of the SORs listed are known to source from this region
- Supplier indicated they have not identified all of the SORs used for the products included in the declaration of scope
- Supplier indicated they have not provided all applicable SOR information received
- Supplier indicated all of the 3TG for products covered by the declaration originates from scrap/recycled sources, but one or more SORs listed are not known to be exclusive recyclers.

100 % of suppliers were evaluated under above rules. The SOR information was not received for 2 suppliers.

Next Steps

Arçelik will continue work hard in 2022 in order to increase transparency through supply chain for mitigating risks and increase awareness. The RMI membership will resume to access the information related with smelters and refiners. Due to its vision “Respecting the World, Respected Worldwide”, Arçelik will work for being guide for all supply chain.

For the next steps, Arçelik is moving towards eliminating non conformant SORs in the supply chain and providing all suppliers work with conformant SORs according to action plan which mentioned in “Improvements and Risk Mitigation Activities” chapter.

Annex A – List of Smelters and Refiners (SORs)

- Conformant** : The smelters and refiners that have successfully completed an assessment against the applicable Responsible Minerals Assurance Process “RMAP” standard or an equivalent cross-recognized assessment by RMI, LBMA or RJC.
- Active** : A 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.
- Non Conformant** : A smelter or refiner is not conformant according to conformant/active list in RMI website. The RMI notes on its website that the operational impacts of COVID-19 have led to postponements of some RMAP assessments.
- No Longer Operational** : The RMI recognizes that the supply chain is fluid and that smelters’ or refiners’ operational status may change over time. (According to 28 April 2021 CMRT Version 6.1) Due to the eligibility criteria for an RMAP assessment, smelters or refiners are sometimes removed from the conformant list because they are no longer operational and not because they are non-conformant to the standard.

<u>Conflict Mineral</u>	<u>Name of Smelter or Refiner (SOR)</u>	<u>Location of SOR</u>	<u>RMAP Status</u>	<u>Certificate ID</u>	<u>Remarks</u>
Gold	8853 S.p.A.	ITALY	Conformant	CID002763	
Gold	Abington Reldan Metals, LLC	UNITED STATES OF AMERICA	Non-conformant	CID002708	Currently in process of removing SOR from supply chain (Level-3)
Gold	Advanced Chemical Company	UNITED STATES OF AMERICA	Conformant	CID000015	
Gold	African Gold Refinery	UGANDA	Non-conformant	CID003185	It will remove from supply chain as a urgent action. (Level-1)
Gold	Aida Chemical Industries Co., Ltd.	JAPAN	Conformant	CID000019	
Gold	Al Etihad Gold Refinery DMCC	UNITED ARAB EMIRATES	Conformant	CID002560	
Gold	Allgemeine Gold-und Silberscheideanstalt A.G.	GERMANY	Conformant	CID000035	
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN	Conformant	CID000041	
Gold	AngloGold Ashanti Corrego do Sitio Mineracao	BRAZIL	Conformant	CID000058	
Gold	Argor-Heraeus S.A.	SWITZERLAND	Conformant	CID000077	
Gold	Asahi Pretec Corp.	JAPAN	Conformant	CID000082	
Gold	Asahi Refining Canada Ltd.	CANADA	Conformant	CID000924	
Gold	Asahi Refining USA Inc.	UNITED STATES OF AMERICA	Conformant	CID000920	
Gold	Asaka Riken Co., Ltd.	JAPAN	Conformant	CID000090	

Gold	Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	TURKEY	Non-conformant	CID000103	Currently in process of removing SOR from supply chain (Level-2)
Gold	AU Traders and Refiners	SOUTH AFRICA	Non-conformant	CID002850	Currently in process of removing SOR from supply chain (Level-2)
Gold	Augmont Enterprises Private Limited	INDIA	Active	CID003461	
Gold	Aurubis AG	GERMANY	Conformant	CID000113	
Gold	Bangalore Refinery	INDIA	Conformant	CID002863	
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES	Conformant	CID000128	
Gold	Boliden AB	SWEDEN	Conformant	CID000157	
Gold	C. Hafner GmbH + Co. KG	GERMANY	Conformant	CID000176	
Gold	C.I Metales Procesados Industriales SAS	COLOMBIA	Active	CID003421	
Gold	Caridad	MEXICO	Non-conformant	CID000180	Currently in process of removing SOR from supply chain (Level-2)
Gold	CCR Refinery - Glencore Canada Corporation	CANADA	Conformant	CID000185	
Gold	Cendres + Metaux S.A.	SWITZERLAND	Conformant	CID000189	
Gold	CGR Metalloys Pvt Ltd.	INDIA	Non-conformant	CID003382	Currently in process of removing SOR from supply chain (Level-2)
Gold	Chimet S.p.A.	ITALY	Conformant	CID000233	
Gold	Chugai Mining	JAPAN	Conformant	CID000264	
Gold	Daye Non-Ferrous Metals Mining Ltd.	CHINA	Non-conformant	CID000343	Currently in process of removing SOR from supply chain (Level-2)
Gold	Degussa Sonne / Mond Goldhandel GmbH	GERMANY	Non-conformant	CID002867	Currently in process of removing SOR from supply chain (Level-3)
Gold	Dijllah Gold Refinery FZC	UNITED ARAB EMIRATES	Non-conformant	CID003348	Currently in process of removing SOR from supply chain (Level-3)
Gold	DODUCO Contacts and Refining GmbH	GERMANY	Conformant	CID000362	
Gold	Dowa	JAPAN	Conformant	CID000401	
Gold	DSC (Do Sung Corporation)	KOREA, REPUBLIC OF	Conformant	CID000359	
Gold	Eco-System Recycling Co., Ltd. East Plant	JAPAN	Conformant	CID000425	
Gold	Eco-System Recycling Co., Ltd. North Plant	JAPAN	Conformant	CID003424	
Gold	Eco-System Recycling Co., Ltd. West Plant	JAPAN	Conformant	CID003425	
Gold	Emirates Gold DMCC	UNITED ARAB EMIRATES	Conformant	CID002561	
Gold	Fidelity Printers and Refiners Ltd.	ZIMBABWE	Non-conformant	CID002515	Currently in process of removing SOR from supply chain (Level-2)
Gold	Fujairah Gold FZC	UNITED ARAB EMIRATES	Non-conformant	CID002584	Currently in process of removing SOR from supply chain (Level-3)

Gold	GCC Gujrat Gold Centre Pvt. Ltd.	INDIA	Non-conformant	CID002852	Currently in process of removing SOR from supply chain (Level-2)
Gold	Geib Refining Corporation	UNITED STATES OF AMERICA	Conformant	CID002459	
Gold	Gold Coast Refinery	GHANA	Non-conformant	CID003186	Currently in process of removing SOR from supply chain (Level-3)
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CHINA	Conformant	CID002243	
Gold	Great Wall Precious Metals Co., Ltd. of CBPM	CHINA	Non-conformant	CID001909	Currently in process of removing SOR from supply chain (Level-2)
Gold	Guangdong Jinding Gold Limited	CHINA	Non-conformant	CID002312	Currently in process of removing SOR from supply chain (Level-2)
Gold	Guoda Safina High-Tech Environmental Refinery Co., Ltd.	CHINA	Non-conformant	CID000651	Currently in process of removing SOR from supply chain (Level-2)
Gold	Hangzhou Fuchunjiang Smelting Co., Ltd.	CHINA	Non-conformant	CID000671	Currently in process of removing SOR from supply chain (Level-2)
Gold	Heimerle + Meule GmbH	GERMANY	Conformant	CID000694	
Gold	Heraeus Germany GmbH Co. KG	GERMANY	Conformant	CID000711	
Gold	Heraeus Metals Hong Kong Ltd.	CHINA	Conformant	CID000707	
Gold	Hunan Chenzhou Mining Co., Ltd.	CHINA	Conformant	CID000767	
Gold	Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd.	CHINA	Non-conformant	CID000773	Currently in process of removing SOR from supply chain (Level-2)
Gold	HwaSeong CJ CO., LTD.	KOREA, REPUBLIC OF	Non-conformant	CID000778	Currently in process of removing SOR from supply chain (Level-3)
Gold	Industrial Refining Company	BELGIUM	Non-conformant	CID002587	Currently in process of removing SOR from supply chain (Level-3)
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co.,	CHINA	Conformant	CID000801	
Gold	International Precious Metal Refiners	UNITED ARAB EMIRATES	Non-conformant	CID002562	Currently in process of removing SOR from supply chain (Level-3)
Gold	Ishifuku Metal Industry Co., Ltd.	JAPAN	Conformant	CID000807	
Gold	Istanbul Gold Refinery	TURKEY	Conformant	CID000814	
Gold	Italpreziosi	ITALY	Conformant	CID002765	
Gold	JALAN & Company	INDIA	Non-conformant	CID002893	Currently in process of removing SOR from supply chain (Level-2)
Gold	Japan Mint	JAPAN	Conformant	CID000823	
Gold	Jiangxi Copper Co., Ltd.	CHINA	Conformant	CID000855	
Gold	JSC Ekaterinburg Non-Ferrous Metal Processing Plant	RUSSIAN FEDERATION	Non-conformant	CID000927	Currently in process of removing SOR from supply chain (Level-2)
Gold	JSC Novosibirsk Refinery	RUSSIAN FEDERATION	Conformant	CID000493	
Gold	JSC Uralelectromed	RUSSIAN FEDERATION	Conformant	CID000929	
Gold	JX Nippon Mining & Metals Co., Ltd.	JAPAN	Conformant	CID000937	

Gold	Kaloti Precious Metals	UNITED ARAB EMIRATES	Non-conformant	CID002563	Currently in process of removing SOR from supply chain (Level-3)
Gold	Kazakhmys Smelting LLC	KAZAKHSTAN	Non-conformant	CID000956	Currently in process of removing SOR from supply chain (Level-2)
Gold	Kazzinc	KAZAKHSTAN	Conformant	CID000957	
Gold	Kennecott Utah Copper LLC	UNITED STATES OF AMERICA	Conformant	CID000969	
Gold	KGHM Polska Miedz Spolka Akcyjna	POLAND	Conformant	CID002511	
Gold	Kojima Chemicals Co., Ltd.	JAPAN	Conformant	CID000981	
Gold	Korea Zinc Co., Ltd.	KOREA, REPUBLIC OF	Conformant	CID002605	
Gold	Kundan Care Products Ltd.	INDIA	Non-conformant	CID003463	Currently in process of removing SOR from supply chain (Level-2)
Gold	Kyrgyzaltyn JSC	KYRGYZSTAN	Non-conformant	CID001029	Currently in process of removing SOR from supply chain (Level-2)
Gold	Kyshtym Copper-Electrolytic Plant ZAO	RUSSIAN FEDERATION	Non-conformant	CID002865	Currently in process of removing SOR from supply chain (Level-2)
Gold	L'azurde Company For Jewelry	SAUDI ARABIA	Non-conformant	CID001032	Currently in process of removing SOR from supply chain (Level-2)
Gold	Lingbao Gold Co., Ltd.	CHINA	Non-conformant	CID001056	Currently in process of removing SOR from supply chain (Level-2)
Gold	Lingbao Jinyuan Tonghui Refinery Co., Ltd.	CHINA	Non-conformant	CID001058	Currently in process of removing SOR from supply chain (Level-2)
Gold	L'Orfebre S.A.	ANDORRA	Conformant	CID002762	
Gold	LS-NIKKO Copper Inc.	KOREA, REPUBLIC OF	Conformant	CID001078	
Gold	LT Metal Ltd.	KOREA, REPUBLIC OF	Conformant	CID000689	
Gold	Luoyang Zijin Yinhui Gold Refinery Co., Ltd.	CHINA	Non-conformant	CID001093	Currently in process of removing SOR from supply chain (Level-2)
Gold	Marsam Metals	BRAZIL	Conformant	CID002606	
Gold	Materion	UNITED STATES OF AMERICA	Conformant	CID001113	
Gold	Matsuda Sangyo Co., Ltd.	JAPAN	Conformant	CID001119	
Gold	Metalor Technologies (Hong Kong) Ltd.	CHINA	Conformant	CID001149	
Gold	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE	Conformant	CID001152	
Gold	Metalor Technologies (Suzhou) Ltd.	CHINA	Conformant	CID001147	
Gold	Metalor Technologies S.A.	SWITZERLAND	Conformant	CID001153	
Gold	Metalor USA Refining Corporation	UNITED STATES OF AMERICA	Conformant	CID001157	
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	MEXICO	Conformant	CID001161	
Gold	Mitsubishi Materials Corporation	JAPAN	Conformant	CID001188	
Gold	Mitsui Mining and Smelting Co., Ltd.	JAPAN	Conformant	CID001193	

Gold	MMTC-PAMP India Pvt., Ltd.	INDIA	Conformant	CID002509	
Gold	Modeltech Sdn Bhd	MALAYSIA	Non-conformant	CID002857	Currently in process of removing SOR from supply chain (Level-3)
Gold	Morris and Watson	NEW ZEALAND	Non-conformant	CID002282	Currently in process of removing SOR from supply chain (Level-3)
Gold	Moscow Special Alloys Processing Plant	RUSSIAN FEDERATION	Conformant	CID001204	
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	TURKEY	Conformant	CID001220	
Gold	Navoi Mining and Metallurgical Combinat	UZBEKISTAN	Conformant	CID001236	
Gold	NH Recytech Company	KOREA, REPUBLIC OF	Conformant	CID003189	
Gold	Nihon Material Co., Ltd.	JAPAN	Conformant	CID001259	
Gold	Ogussa Osterreichische Gold- und Silber-Scheideanstalt Gm	AUSTRIA	Conformant	CID002779	
Gold	Ohura Precious Metal Industry Co., Ltd.	JAPAN	Conformant	CID001325	
Gold	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant"	RUSSIAN FEDERATION	Conformant	CID001326	
Gold	PAMP S.A.	SWITZERLAND	Conformant	CID001352	
Gold	Pease & Curren	UNITED STATES OF AMERICA	Non-conformant	CID002872	Currently in process of removing SOR from supply chain (Level-3)
Gold	Penglai Penggang Gold Industry Co., Ltd.	CHINA	Non-conformant	CID001362	Currently in process of removing SOR from supply chain (Level-2)
Gold	Planta Recuperadora de Metales SpA	CHILE	Conformant	CID002919	
Gold	Prioksky Plant of Non-Ferrous Metals	RUSSIAN FEDERATION	Conformant	CID001386	
Gold	PT Aneka Tambang (Persero) Tbk	INDONESIA	Conformant	CID001397	
Gold	PX Precinox S.A.	SWITZERLAND	Conformant	CID001498	
Gold	QG Refining, LLC	UNITED STATES OF AMERICA	Non-conformant	CID003324	Currently in process of removing SOR from supply chain (Level-3)
Gold	Rand Refinery (Pty) Ltd.	SOUTH AFRICA	Conformant	CID001512	
Gold	Refinery of Seemine Gold Co., Ltd.	CHINA	Non-conformant	CID000522	Currently in process of removing SOR from supply chain (Level-2)
Gold	REMONDIS PMR B.V.	NETHERLANDS	Conformant	CID002582	
Gold	Royal Canadian Mint	CANADA	Conformant	CID001534	
Gold	SAAMP	FRANCE	Conformant	CID002761	
Gold	Sabin Metal Corp.	UNITED STATES OF AMERICA	Non-conformant	CID001546	Currently in process of removing SOR from supply chain (Level-3)
Gold	SAFINA A.S.	CZECHIA	Conformant	CID002290	
Gold	Safimet S.p.A	ITALY	Conformant	CID002973	
Gold	Sai Refinery	INDIA	Non-conformant	CID002853	Currently in process of removing SOR from supply chain (Level-2)

Gold	Samduck Precious Metals	KOREA, REPUBLIC OF	Conformant	CID001555	
Gold	Samwon Metals Corp.	KOREA, REPUBLIC OF	Non-conformant	CID001562	Currently in process of removing SOR from supply chain (Level-3)
Gold	SAXONIA Edelmetalle GmbH	GERMANY	Conformant	CID002777	
Gold	SEMPSA Joyeria Plateria S.A.	SPAIN	Conformant	CID001585	
Gold	Shandong Gold Smelting Co., Ltd.	CHINA	Conformant	CID001916	
Gold	Shandong Humon Smelting Co., Ltd.	CHINA	Non-conformant	CID002525	Currently in process of removing SOR from supply chain (Level-2)
Gold	Shandong Tiancheng Biological Gold Industrial Co., Ltd.	CHINA	Non-conformant	CID001619	Currently in process of removing SOR from supply chain (Level-2)
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CHINA	Conformant	CID001622	
Gold	Shirpur Gold Refinery Ltd.	INDIA	Non-conformant	CID002588	Currently in process of removing SOR from supply chain (Level-2)
Gold	Sichuan Tianze Precious Metals Co., Ltd.	CHINA	Conformant	CID001736	
Gold	Singway Technology Co., Ltd.	TAIWAN, PROVINCE OF CHI.	Conformant	CID002516	
Gold	SOE Shyolkovsky Factory of Secondary Precious Metals	RUSSIAN FEDERATION	Conformant	CID001756	
Gold	Solar Applied Materials Technology Corp.	TAIWAN, PROVINCE OF CHI.	Conformant	CID001761	
Gold	Sovereign Metals	INDIA	Non-conformant	CID003383	Currently in process of removing SOR from supply chain (Level-2)
Gold	State Research Institute Center for Physical Sciences and T.	LITHUANIA	Non-conformant	CID003153	Currently in process of removing SOR from supply chain (Level-3)
Gold	Sudan Gold Refinery	SUDAN	Non-conformant	CID002567	Currently in process of removing SOR from supply chain (Level-2)
Gold	Sumitomo Metal Mining Co., Ltd.	JAPAN	Conformant	CID001798	
Gold	SungEel HiMetal Co., Ltd.	KOREA, REPUBLIC OF	Conformant	CID002918	
Gold	T.C.A S.p.A	ITALY	Conformant	CID002580	
Gold	Tanaka Kikinzoku Kogyo K.K.	JAPAN	Conformant	CID001875	
Gold	Tokuriki Honten Co., Ltd.	JAPAN	Conformant	CID001938	
Gold	Tongling Nonferrous Metals Group Co., Ltd.	CHINA	Non-conformant	CID001947	Currently in process of removing SOR from supply chain (Level-2)
Gold	TOO Tau-Ken-Altyn	KAZAKHSTAN	Conformant	CID002615	
Gold	Torecom	KOREA, REPUBLIC OF	Conformant	CID001955	
Gold	TSK Pretech	KOREA, REPUBLIC OF	Non-conformant	CID003195	Currently in process of removing SOR from supply chain (Level-3)
Gold	Umicore Brasil Ltda.	BRAZIL	No Longer Operational	CID001977	
Gold	Umicore Precious Metals Thailand	THAILAND	Conformant	CID002314	
Gold	Umicore S.A. Business Unit Precious Metals Refining	BELGIUM	Conformant	CID001980	

Gold	United Precious Metal Refining, Inc.	UNITED STATES OF AMERICA	Conformant	CID001993	
Gold	Valcambi S.A.	SWITZERLAND	Conformant	CID002003	
Gold	Western Australian Mint (T/a The Perth Mint)	AUSTRALIA	Conformant	CID002030	
Gold	WIELAND Edelmetalle GmbH	GERMANY	Conformant	CID002778	
Gold	Yamakin Co., Ltd.	JAPAN	Conformant	CID002100	
Gold	Yokohama Metal Co., Ltd.	JAPAN	Conformant	CID002129	
Gold	Yunnan Copper Industry Co., Ltd.	CHINA	Non-conformant	CID000197	Currently in process of removing SOR from supply chain (Level-2)
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA	Conformant	CID002224	
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	CHINA	Conformant	CID000211	
Tantalum	CP Metals Inc.	UNITED STATES OF AMERICA	No Longer Operational	CID003402	
Tantalum	D Block Metals, LLC	UNITED STATES OF AMERICA	Conformant	CID002504	
Tantalum	Exotech Inc.	UNITED STATES OF AMERICA	Conformant	CID000456	
Tantalum	F&X Electro-Materials Ltd.	CHINA	Conformant	CID000460	
Tantalum	FIR Metals & Resource Ltd.	CHINA	Conformant	CID002505	
Tantalum	Global Advanced Metals Aizu	JAPAN	Conformant	CID002558	
Tantalum	Global Advanced Metals Boyertown	UNITED STATES OF AMERICA	Conformant	CID002557	
Tantalum	H.C. Starck Hermsdorf GmbH	GERMANY	Conformant	CID002547	
Tantalum	H.C. Starck Inc.	UNITED STATES OF AMERICA	Conformant	CID002548	
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA	Conformant	CID002492	
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHINA	Conformant	CID002512	
Tantalum	Jiangxi Tuohong New Raw Material	CHINA	Conformant	CID002842	
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINA	Conformant	CID000914	
Tantalum	Jiujiang Tanbre Co., Ltd.	CHINA	Conformant	CID000917	
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA	Conformant	CID002506	
Tantalum	KEMET de Mexico	MEXICO	Conformant	CID002539	Currently in process of removing SOR from supply chain (Level-2)
Tantalum	LSM Brasil S.A.	BRAZIL	Non-conformant	CID001076	
Tantalum	Meta Materials	NORTH MACEDONIA, REP.	Conformant	CID002847	
Tantalum	Metallurgical Products India Pvt., Ltd.	INDIA	Conformant	CID001163	
Tantalum	Mineracao Taboca S.A.	BRAZIL	Conformant	CID001175	

Tantalum	Mitsui Mining and Smelting Co., Ltd.	JAPAN	Conformant	CID001193	
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA	Conformant	CID001277	
Tantalum	NPM Silmet AS	ESTONIA	Conformant	CID001200	
Tantalum	QuantumClean	UNITED STATES OF AMERICA	Conformant	CID001508	
Tantalum	Resind Industria e Comercio Ltda.	BRAZIL	Conformant	CID002707	
Tantalum	Solikamsk Magnesium Works OAO	RUSSIAN FEDERATION	Conformant	CID001769	
Tantalum	Taki Chemical Co., Ltd.	JAPAN	Conformant	CID001869	
Tantalum	TANIOBIS Co., Ltd.	THAILAND	Conformant	CID002544	
Tantalum	TANIOBIS GmbH	GERMANY	Conformant	CID002545	
Tantalum	TANIOBIS Japan Co., Ltd.	JAPAN	Conformant	CID002549	
Tantalum	TANIOBIS Smelting GmbH & Co. KG	GERMANY	Conformant	CID002550	
Tantalum	Telex Metals	UNITED STATES OF AMERICA	Conformant	CID001891	
Tantalum	Ulba Metallurgical Plant JSC	KAZAKHSTAN	Conformant	CID001969	
Tantalum	XIMEI RESOURCES (GUANGDONG) LIMITED	CHINA	Conformant	CID000616	
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	CHINA	Conformant	CID002508	
Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	CHINA	Conformant	CID001522	
Tin	Alpha	UNITED STATES OF AMERICA	Conformant	CID000292	
Tin	An Vinh Joint Stock Mineral Processing Company	VIET NAM	Non-conformant	CID002703	Currently in process of removing SOR from supply chain (Level-2)
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CHINA	Conformant	CID000228	
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CHINA	Conformant	CID003190	Currently in process of removing SOR from supply chain (Level-2)
Tin	China Tin Group Co., Ltd.	CHINA	Conformant	CID001070	Currently in process of removing SOR from supply chain (Level-2)
Tin	Dongguan CiEXPO Environmental Engineering Co., Ltd.	CHINA	Non-conformant	CID003356	
Tin	Dowa	JAPAN	Conformant	CID000401	Currently in process of removing SOR from supply chain (Level-2)
Tin	Electro-Mechanical Facility of the Cao Bang Minerals & M.	VIET NAM	Non-conformant	CID002572	
Tin	EM Vinto	BOLIVIA	Conformant	CID000438	
Tin	Estanho de Rondonia S.A.	BRAZIL	Active	CID000448	Currently in process of removing SOR from supply chain (Level-2)
Tin	Fenix Metals	POLAND	Conformant	CID000468	
Tin	Gejiu City Fuxiang Industry and Trade Co., Ltd.	CHINA	Non-conformant	CID003410	

Tin	Gejiu Kai Meng Industry and Trade LLC	CHINA	Conformant	CID000942	
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA	Conformant	CID000538	
Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	CHINA	Conformant	CID001908	
Tin	Gejiu Zili Mining And Metallurgy Co., Ltd.	CHINA	Conformant	CID000555	
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CHINA	Conformant	CID003116	
Tin	Guanyang Guida Nonferrous Metal Smelting Plant	CHINA	No Longer Operational	CID002849	
Tin	HuiChang Hill Tin Industry Co., Ltd.	CHINA	Conformant	CID002844	
Tin	Huichang Jinshunda Tin Co., Ltd.	CHINA	No Longer Operational	CID000760	
Tin	Huichang Shun Tin Kam Industries, Ltd.	CHINA	No Longer Operational	CID000760	
Tin	Jiangxi New Nanshan Technology Ltd.	CHINA	Conformant	CID001231	
Tin	Luna Smelter, Ltd.	RWANDA	Conformant	CID003387	
Tin	Ma'anshan Weitai Tin Co., Ltd.	CHINA	Conformant	CID003379	
Tin	Magnu's Minerais Metais e Ligas Ltda.	BRAZIL	Conformant	CID002468	
Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA	Conformant	CID001105	
Tin	Melt Metais e Ligas S.A.	BRAZIL	Conformant	CID002500	
Tin	Metallic Resources, Inc.	UNITED STATES OF AMERICA	Conformant	CID001142	
Tin	Metallo Belgium N.V.	BELGIUM	Conformant	CID002773	
Tin	Metallo Spain S.L.U.	SPAIN	Conformant	CID002774	
Tin	Mineracao Taboca S.A.	BRAZIL	Conformant	CID001175	Currently in process of removing SOR from supply chain (Level-2)
Tin	Minsur	PERU	Conformant	CID001182	Currently in process of removing SOR from supply chain (Level-2)
Tin	Nghe Tinh Non-Ferrous Metals Joint Stock Company	VIET NAM	Non-conformant	CID002573	
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND	Conformant	CID001314	
Tin	O.M. Manufacturing Philippines, Inc.	PHILIPPINES	Conformant	CID002517	
Tin	Operaciones Metalurgicas S.A.	BOLIVIA	Conformant	CID001337	
Tin	Pongpipat Company Limited	MYANMAR	Non-conformant	CID003208	
Tin	Precious Minerals and Smelting Limited	INDIA	Non-conformant	CID003409	
Tin	PT Artha Cipta Langgeng	INDONESIA	Conformant	CID001399	
Tin	PT ATD Makmur Mandiri Jaya	INDONESIA	Conformant	CID002503	
Tin	PT Bangka Serumpun	INDONESIA	Conformant	CID003205	

Tin	PT Mitra Stania Prima	INDONESIA	Conformant	CID001453	
Tin	PT Mitra Sukses Globalindo	INDONESIA	Active	CID003449	
Tin	PT Refined Bangka Tin	INDONESIA	Conformant	CID001460	
Tin	PT Timah Tbk Kundur	INDONESIA	Conformant	CID001477	
Tin	PT Timah Tbk Mentok	INDONESIA	Conformant	CID001482	Currently in process of removing SOR from supply chain (Level-2)
Tin	Rui Da Hung	TAIWAN, PROVINCE OF CHI.	Conformant	CID001539	
Tin	Soft Metais Ltda.	BRAZIL	Conformant	CID001758	
Tin	Super Ligas	BRAZIL	Active	CID002756	Currently in process of removing SOR from supply chain (Level-2)
Tin	Thai Nguyen Mining and Metallurgy Co., Ltd.	VIET NAM	Conformant	CID002834	
Tin	Thaisarco	THAILAND	Conformant	CID001898	
Tin	Tin Technology & Refining	UNITED STATES OF AMERICA	Conformant	CID003325	
Tin	Tuyen Quang Non-Ferrous Metals Joint Stock Company	VIET NAM	Non-conformant	CID002574	
Tin	White Solder Metalurgia e Mineracao Ltda.	BRAZIL	Conformant	CID002036	
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA	Conformant	CID002158	
Tin	Yunnan Tin Company Limited	CHINA	Non-conformant	CID002180	
Tin	Yunnan Yunfan Non-ferrous Metals Co., Ltd.	CHINA	Conformant	CID003397	
Tungsten	A.L.M.T. Corp.	JAPAN	Conformant	CID000004	
Tungsten	ACL Metais Eireli	BRAZIL	Conformant	CID002833	
Tungsten	Albasteel Industria e Comercio de Ligas Para Fundicao Ltd.	BRAZIL	Active	CID003427	
Tungsten	Asia Tungsten Products Vietnam Ltd.	VIET NAM	Conformant	CID002502	
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.	CHINA	Conformant	CID002513	
Tungsten	China Molybdenum Tungsten Co., Ltd.	CHINA	Conformant	CID002641	
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA	Conformant	CID000258	
Tungsten	CNMC (Guangxi) PGMA Co., Ltd.	CHINA	Non-conformant	CID000281	
Tungsten	Cronimet Brasil Ltda	BRAZIL	Conformant	CID003468	
Tungsten	Fujian Ganmin RareMetal Co., Ltd.	CHINA	Conformant	CID003401	
Tungsten	Fujian Jinxin Tungsten Co., Ltd.	CHINA	No Longer Operational	CID000499	
Tungsten	Ganzhou Haichuang Tungsten Co., Ltd.	CHINA	Conformant	CID002645	
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	CHINA	Conformant	CID000875	Currently in process of removing SOR from supply chain (Level-2)

Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHINA	Conformant	CID002315	
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA	Conformant	CID002494	
Tungsten	GEM Co., Ltd.	CHINA	Non-conformant	CID003417	
Tungsten	Global Tungsten & Powders Corp.	UNITED STATES OF AMERICA	Conformant	CID000568	
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CHINA	Conformant	CID000218	
Tungsten	H.C. Starck Tungsten GmbH	GERMANY	Conformant	CID002541	
Tungsten	Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji	CHINA	No Longer Operational	CID002579	Currently in process of removing SOR from supply chain (Level-2)
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.	CHINA	Conformant	CID000769	
Tungsten	Hunan Litian Tungsten Industry Co., Ltd.	CHINA	Non-conformant	CID003182	
Tungsten	Hydrometallurg, JSC	RUSSIAN FEDERATION	Conformant	CID002649	
Tungsten	Japan New Metals Co., Ltd.	JAPAN	Conformant	CID000825	
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA	Conformant	CID002551	
Tungsten	Jiangxi Dayu Longxintai Tungsten Co., Ltd.	CHINA	No Longer Operational	CID002647	
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CHINA	Conformant	CID002321	Currently in process of removing SOR from supply chain (Level-2)
Tungsten	Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.	CHINA	Non-conformant	CID002313	
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., L.	CHINA	Conformant	CID002318	
Tungsten	Jiangxi Xianglu Tungsten Co., Ltd.	CHINA	No Longer Operational	CID002647	
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CHINA	Conformant	CID002317	
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CHINA	Conformant	CID002316	
Tungsten	JSC "Kirovgrad Hard Alloys Plant"	RUSSIAN FEDERATION	Conformant	CID003408	
Tungsten	Kennametal Fallon	UNITED STATES OF AMERICA	Conformant	CID000966	
Tungsten	Kennametal Huntsville	UNITED STATES OF AMERICA	Conformant	CID000105	
Tungsten	KGETS Co., Ltd.	KOREA, REPUBLIC OF	Conformant	CID003388	Currently in process of removing SOR from supply chain (Level-2)
Tungsten	Lianyou Metals Co., Ltd.	TAIWAN, PROVINCE OF CHI.	Conformant	CID003407	
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CHINA	Conformant	CID002319	
Tungsten	Masan High-Tech Materials	VIET NAM	Conformant	CID002543	
Tungsten	Moliren Ltd.	RUSSIAN FEDERATION	Conformant	CID002845	
Tungsten	Niagara Refining LLC	UNITED STATES OF AMERICA	Conformant	CID002589	

Tungsten	NPP Tyazhmetprom LLC	RUSSIAN FEDERATION	Active	CID003416
Tungsten	Philippine Chuangxin Industrial Co., Inc.	PHILIPPINES	Conformant	CID002827
Tungsten	Shaoguan Xinhai Rendan Tungsten Industry Co. Ltd	CHINA	No Longer Operational	CID002095
Tungsten	South-East Nonferrous Metal Company Limited of Hengy.	CHINA	No Longer Operational	CID002815
Tungsten	Tejing (Vietnam) Tungsten Co., Ltd.	VIET NAM	No Longer Operational	CID001889
Tungsten	Unecha Refractory metals plant	RUSSIAN FEDERATION	Conformant	CID002724
Tungsten	Wolfram Bergbau und Hutten AG	AUSTRIA	Conformant	CID002044
Tungsten	Woltech Korea Co., Ltd.	KOREA, REPUBLIC OF	Conformant	CID002843
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CHINA	Conformant	CID002320
Tungsten	Xiamen Tungsten Co., Ltd.	CHINA	Conformant	CID002082
Tungsten	Xinfeng Huarui Tungsten & Molybdenum New Material Co.,	CHINA	Conformant	CID002830
Tungsten	Xinhai Rendan Shaoguan Tungsten Co., Ltd.	CHINA	No Longer Operational	CID002095
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CHINA	Conformant	CID002316
Tungsten	JSC "Kirovgrad Hard Alloys Plant"	RUSSIAN FEDERATION	Conformant	CID003408

ANNEX B – County of Origin Information

Countries of Origin below is an aggregated list of countries of origin, to the extent known, from which the SORs listed in Annex A are believed to have sourced conflict minerals, based on data available from RMI as of April 28, 2021.

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

*The DRC or an adjoining country