

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

**FORM SD
SPECIALIZED DISCLOSURE REPORT**

Entegris, Inc.

(Exact name of the registrant as specified in its charter)

Delaware
(State or other jurisdiction of
incorporation or organization)

001-32598
(Commission
File Number)

41-1941551
(IRS Employer
Identification No).

129 Concord Road
Billerica, Massachusetts
(Address of principal executive offices)

1821
(Zip Code)

Gregory B. Graves
Executive Vice President, Chief Financial Officer and Treasurer
(978) 436-6500

(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, 2019 to December 31, 2019.

Section 1 - Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

Conflict Minerals Disclosure

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

A copy of Conflict Minerals Report is provided as Exhibit 1.01 and is publicly available at

<https://www.entegris.com/content/dam/web/about-us/corporate-overview/documents/report-conflict-minerals.pdf>

Item 1.02 Exhibit

As specified in Section 2, Item 2.01 of this Form SD, the Company is hereby filing its Conflict Minerals Report as Exhibit 1.01 of this report.

Section 2 - Exhibits

Item 2.01 Exhibits

The following exhibit is filed as part of this report.

| Exhibit No. | Description |
|--------------------|---|
| 1.01 | <u>Entegris, Inc. Conflict Minerals Report for the reporting period from January 1, 2019 to December 31, 2019</u> |

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.

ENTEGRIS, INC.

By: /s/ Gregory B. Graves

Name: Gregory B. Graves

Title: Executive Vice President and Chief Financial Officer

May 29, 2020

(Date)

Entegris, Inc.**Conflict Minerals Report****For the reporting period from January 1, 2019 to December 31, 2019****1. Introduction**

This Conflict Minerals Report (this “Report”) of Entegris, Inc. (herein referred to as the “Company”, “we”, “us”, or “our”) has been prepared pursuant to Rule 13p-1 and Form SD (the “Rule”) promulgated under the Securities Exchange Act of 1934, as amended (the “Exchange Act”), for the reporting period from January 1, 2019 to December 31, 2019.

The Rule was adopted by the Securities and Exchange Commission (the “SEC”) to implement reporting and disclosure requirements related to conflict minerals as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010.

The Rule requires disclosure of certain information when a company manufactures or contracts to manufacture products and the minerals specified in the Rule are necessary to the functionality or production of those products. “Conflict Minerals” are defined as cassiterite, columbite-tantalite (coltan), wolframite, gold and their derivatives, which are limited to tin, tantalum, tungsten, and gold (“3TG”). These requirements apply to registrants whatever the geographic origin of the Conflict Minerals and whether or not they fund armed conflict. The “Covered Countries” for the purposes of the Rule and this Report are the Democratic Republic of the Congo, the Republic of the Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola.

If any 3TGs are necessary to the functionality or production of a product manufactured by the registrant or contracted by the registrant to be manufactured and are required to be reported in the calendar year covered by the Specialized Disclosure Report on Form SD (the “Form SD”), the registrant must conduct in good faith a reasonable country of origin inquiry (“RCOI”) regarding those 3TGs that is reasonably designed to determine whether any of the 3TGs originated in the Covered Countries or are from recycled or scrap sources.

Based on its RCOI, if the registrant knows that any of its necessary 3TGs originated in the Covered Countries and are not from recycled or scrap sources, or has reason to believe that its necessary 3TGs may have originated in the Covered Countries and has reason to believe that they may not be from recycled or scrap sources, the registrant must exercise due diligence on the source and chain of custody of its 3TGs that conforms to a nationally or internationally recognized due diligence framework. If, as a result of that due diligence, the registrant is unable to determine that its 3TGs did not originate in the Covered Countries or the registrant determines that its 3TGs did come from recycled or scrap sources, the registrant must annually file a Report as an exhibit to its Form SD that includes a description of its due diligence measures on the source and chain of custody of those 3TGs.

This Report has not been audited.

Certain information contained in this Report may constitute forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995. These forward-looking statements are based on current management expectations only as of the date of the Form SD to which this Report is an Exhibit and involve substantial risks and uncertainties that could cause actual results to differ materially from the results expressed in, or implied by, these forward-looking statements. Statements that include such words as “anticipate,” “believe,” “estimate,” “expect,” “forecast,” “may,” “will,” “should” or the negative thereof and similar expressions as they relate to the Company or our management are intended to identify such forward-looking statements. These statements are not a guarantee of future performance and involve risks, uncertainties and assumptions that are difficult to predict. These risks include but are not limited to, our ability to successfully implement the steps indicated in the “Additional Risk Mitigation Steps” section of this Report, our ability to

implement such steps in the anticipated timeframe, and other factors. Except as required under the federal securities laws and the rules and regulations of the SEC, we undertake no obligation to update publicly any forward-looking statements contained herein.

1.1. Company Overview

We are a leading global developer, manufacturer and supplier of microcontamination control products, specialty chemicals and advanced materials handling solutions for manufacturing processes in the semiconductor and other high-technology industries. We leverage our unique breadth of capabilities to create value for our customers by developing mission-critical solutions to maximize manufacturing yields, reduce manufacturing costs and enable higher device performance.

Semiconductors, or integrated circuits, are key components in modern electronic devices. Smartphones (including 5G), cloud computing, the Internet of Things, artificial intelligence, autonomous vehicles and other applications require faster, more powerful and more energy efficient semiconductors. In response to these requirements and the growing demand from these applications, semiconductor manufacturing technology has rapidly been moving to smaller and more complex dimensions, adopting new device architectures, such as fin field-effect, or FinFET, transistors and 3D-NAND, and utilizing new and innovative manufacturing materials to increase transistor performance and bit density. As technology nodes become increasingly complex, to enable improvements and to maximize yields, manufacturers require the effective development and application of new materials, a reliable and consistent supply of high-value materials, and contamination-free transportation, storage and delivery of these materials, seamlessly integrated into the semiconductor manufacturing process, at ever-increasing levels of purity and contaminant control (up to the part per quadrillion scale). Additionally, the effective management and maintenance of the entire materials handling system, from initial production of process chemistry, to transportation and dispensing onto the wafer, has grown in importance to enhanced device yield.

We believe that greater materials intensity and greater materials purity will be the two defining factors of the next generation of semiconductor performance. We are well positioned to help our customers achieve their targeted levels of chip performance, yields and reliability. Our technology portfolio includes advanced materials and high-purity chemistries, with optimized packaging and delivery systems and in-process filtration and purification solutions that ensure high-value liquid chemistries and gases are free from contaminants before use. Our standard and customized products and solutions enable the highest levels of purity and performance that are essential to the manufacture of semiconductors, flat panel displays, light emitting diodes, or LEDs, high-purity chemicals, solar cells, gas lasers, optical and magnetic storage devices, and critical components for aerospace, glass manufacturing and biomedical applications. The majority of our products are consumed at various times throughout the manufacturing process, with demand driven in part by the level of semiconductor and other manufacturing activity.

Our business is organized and operated in three operating segments, which align with the key elements of the advanced semiconductor manufacturing ecosystem. The Specialty Chemicals and Engineered Materials, or SCHEM, segment provides high-performance and high-purity process chemistries, gases, and materials, and safe and efficient delivery systems to support semiconductor and other advanced manufacturing processes. The Microcontamination Control, or MC, segment offers solutions to filter and purify critical liquid chemistries and gases used in semiconductor manufacturing processes and other high-technology industries. The Advanced Materials Handling, or AMH, segment develops solutions to monitor, protect, transport, and deliver critical liquid chemistries, wafers and other substrates for a broad set of applications in the semiconductor industry and other high-technology industries. While these segments have separate products and technical know-how, they share common business systems and processes, technology centers, and strategic and technology roadmaps. We leverage our expertise from these three segments and complementary product portfolios to create new and increasingly integrated solutions for our customers.

3TGs are used in the Company's business units which utilize the following components: solid deposition chemistries, sensors, monitors, valves, control modules, displays, pressure transducers, flow controllers, printed circuit boards, printed wire board, and cables. Tin (primarily in tin-based solder) and gold (in electronic components) are the predominant materials in use, while tantalum is reported on a minimal level, and tungsten is mainly found in tungsten impregnated graphite and a few specialty chemicals.

In February 2014, the Company adopted a policy relating to Conflict Minerals (the "Conflict Minerals Policy") incorporating the standards set forth in the then-current version of the Organization for Economic Cooperation and Development ("OECD") Due Diligence Guidance for Responsible Supply Chains of Materials from Conflict-Affected and High-Risk Areas, second edition (the "OECD Guidance"). Our Conflict Minerals Policy can be found on our website at <https://www.entegris.com/content/dam/web/about-us/corporate-overview/documents/policies/policy-conflict-minerals.pdf>

1.2. Supply Chain

As a developer, manufacturer and supplier of products and materials to semiconductor and other high- technology industries, the Company is several levels removed from the mining and refining of 3TGs.

The Company does not make purchases of raw ore or unrefined 3TGs and makes no direct purchases in the Covered Countries. As a result, we rely on our suppliers to provide information on the origin of 3TGs that may be contained in components and materials supplied to us.

While negotiating new supply agreements or renewals of existing supply agreements, members of our procurement organization provide the requirements of the Rule and Conflict Minerals Disclosure process to suppliers to increase awareness and educate our suppliers on the Rule's requirement for cooperation and reporting from sub-suppliers.

We are committed to compliance with the Rule and working toward avoiding the use of 3TGs that directly or indirectly finance or benefit armed groups in the Covered Countries. If we become aware of a supplier whose supply chain includes minerals that are not conflict free, we will take appropriate steps to address the situation in a timely manner, including reassessment of the supplier relationship. We expect our suppliers to take similar measures with their sub-suppliers.

2. Reasonable Country of Origin Inquiry Program

The Company conducted a RCOI regarding the 3TGs in materials, components and finished goods supplied to the Company. With the assistance of our third-party compliance partner Assent Compliance Inc. ("Assent"), we contacted all our suppliers with an automated email describing the compliance requirements and requesting supply chain information be submitted pursuant to version 5.12 or higher of the Responsible Minerals Initiative Conflict Minerals Reporting Template ("CMRT"). Additionally, if a response was not received from the initial contact, follow-up emails were sent to suppliers offering assistance and further information about the requirements of the Rule and its requirements. If, after these outreach efforts, a supplier still did not respond to the survey, the Company's relevant supplier relationship managers were instructed to contact those suppliers directly for a response. As of May 22, 2020, the Company had an overall response rate from surveyed suppliers of 85.4%.

The Company utilized a software platform which validated the information submitted on CMRTs. The goal of data validation is to increase the accuracy of submissions and identify any contradictory answers in the CMRT. All submitted forms are accepted and classified as valid or invalid so that, in either event, data is retained. Suppliers were contacted regarding invalid forms and were encouraged to resubmit a valid form. As of May 22, 2020, we had 10 invalid supplier submissions that were not yet corrected.

Assent compared the list of smelters and refiners provided in our suppliers' responses to the lists of smelters maintained by the Responsible Minerals Initiative (the "RMI") and, if a supplier indicated that a facility was

certified as conflict-free, confirmed that the facility was listed on RMI's list of validated conflict free smelters and refiners of 3TGs. Our suppliers identified a total of 307 smelters and refiners that appear on the lists maintained by RMI. Of these 307 smelters and refiners, 235 are validated as conflict free by RMI or a cross-recognized initiative, and, based on information provided by RMI, a further 7 have agreed to undergo or are currently undergoing a third-party audit. Most of the CMRTs we received were made on a company or division level basis which did not allow us to identify which smelters or refiners listed by our suppliers processed the 3TGs contained in our products.

2.1. Reasonable Country of Origin Inquiry Results

Based on the responses to our RCOI, the Company is unable to determine that 3TGs necessary to the functionality or production of our products did not originate in the Covered Countries or were not exclusively from recycled or scrap sources. Accordingly, the Company undertook the measures described below to assess the due diligence practices of the smelters and refiners listed on its unique smelter list that were known or reasonably believed to have sourced from the DRC or that had unknown sourcing.

3. Due Diligence

We established a Conflict Minerals compliance program that is designed to conform, in all material respects, to the framework in the OECD Guidance and the related supplements for gold, tin, tantalum and tungsten. The Guidance identifies five steps for due diligence that should be implemented and provides guidance as to how to achieve each step. We developed our due diligence process to address each of these five steps, namely:

- 1) Establishing strong company management systems regarding Conflict Minerals;
- 2) Identifying and assessing risks in our supply chain;
- 3) Designing and implementing a strategy to respond to identified risks in our supply chain;
- 4) Utilizing independent third-party audits of supply chain diligence; and
- 5) Publicly reporting on our supply chain due diligence.

We are a downstream supplier, many steps removed from the mining of 3TGs. Many suppliers, through multiple tiers of distribution, supply the components and materials integrated into our products. Furthermore, the Company does not purchase raw ore or unrefined Conflict Minerals or make purchases from the Covered Countries. The origin of the Conflict Minerals cannot be determined with any certainty once the raw ores are smelted, refined and converted to ingots, bullion or other Conflict Mineral containing derivatives. The smelters and refiners consolidate raw ore and represent the best actors in the total supply chain to possess knowledge of the origin of the ores they procure.

The OECD Guidance specifies that the requirements for compliance should reflect a company's position in the supply chain. The OECD Guidance states that the implementation of due diligence should be tailored to a company's activities and relationships and that the nature and extent of due diligence may vary based on a company's size, products, relationships with suppliers and other factors. Due to practical difficulties associated with supply chain complexities, the OECD Guidance advises that downstream companies exercise due diligence primarily by establishing controls over their immediate suppliers. Accordingly, we rely primarily on our "tier 1" (direct) suppliers to provide information with respect to the origin of the Conflict Minerals contained in the components and materials supplied to us.

3.1. Establish Strong Company Management System

3.1.1. Management System Team

The Company has established a management system with respect to the Rule and the obligations thereof. Our management system includes a cross-functional team, with representatives from Environmental, Health and

Safety (“EHS”), Procurement, Product Stewardship, Legal and Internal Audit departments. The Product Stewardship team is responsible for implementing our Conflict Minerals compliance strategy and is led by the Vice President of EHS. Senior management is briefed about the results of the Product Stewardship team’s progress and due diligence efforts on a regular basis.

The Company also uses a third-party service provider, Assent Compliance, to assist us with evaluating supply chain information regarding 3TGs, identifying potential risks, and in the development and implementation of additional due diligence steps that we will undertake with suppliers regarding Conflict Minerals.

3.1.2. Conflict Mineral Policy

As described above, in February 2014, the Company adopted the Conflict Minerals Policy incorporating the standards set forth in the then-current version of the OECD Guidance. Our Conflict Minerals Policy can be found on our website at <https://www.entegris.com/content/dam/web/about-us/corporate-overview/documents/policies/policy-conflict-minerals.pdf>

3.1.3. Control Systems

Internal controls include our on-going initiative of integrating Conflict Minerals related provisions in our supply agreements that require disclosure of 3TGs and Conflict Minerals. In addition, through membership with industry associations like National Association of Environmental Managers (“NAEM”), Semiconductor Equipment and Materials International (“SEMI”) and Responsible Business Alliance (“RBA”), the Company actively monitors best practices used by other manufacturers in the semiconductor and high technology sectors and participates in industry-wide initiatives to control the use of Conflict Minerals. While a portion of our direct suppliers are also Exchange Act registered companies which are subject to and knowledgeable about the Rule, we also have many other suppliers and distributors that are not registered companies that require additional training to understand the requirements of the Rule. In 2019, the Company continued the engagement with Assent to further implement Conflict Mineral surveys, outreach, and tracking best practices.

3.1.4. Supplier Engagement

In accordance with the OECD requirement to strengthen engagement with suppliers, we have made reasonable inquiries to direct suppliers to obtain 3TG data, provided them with requirements of our Conflict Minerals Policy and informed them as to where they may find additional information on the requirements relating to Conflict Minerals disclosure. The Company has provided education and training relating to the Rule and to Conflict Minerals to all in-scope suppliers by providing such suppliers with access to Assent’s Learning Management System training course. This training is tracked and evaluated based on completion. All suppliers are encouraged to complete all modules within this course. Additionally, as identified earlier, our procurement organization continues to integrate Conflict Minerals related requirements language into new supply agreements or renewals of existing supply agreements during negotiations. Accordingly, we are continuing our attempts to identify risks before entering into such agreements, so that steps can be taken to confirm suppliers have implemented processes to identify the origin of 3TGs.

3.1.5. Maintain Records

As part of our EHS Management System, we have developed a record retention requirement for information relating to the management of our Conflict Minerals compliance process. All relevant records will be retained for a period of 5 years.

3.1.6. Grievance Mechanism

Our Code of Business Ethics, which is available on our website at <https://www.entegris.com/content/dam/web/about-us/corporate-overview/documents/certificates/entegris-code-of-business-ethics.pdf> provides details about our grievance mechanisms, such as the details of our dedicated hotline, whereby violations of our policies, including our Conflict Minerals Policy, may be reported. In addition, the Company has established a monitored

email account, with the address of supplier.whistleblowing@Entegris.com, and has notified its suppliers of such email address, so that suppliers may provide information regarding Conflict Minerals compliance issues.

3.2. Identify and Assess Risk in the Supply Chain

Because of our size, the complexity of our products, and the depth, breadth, and constant evolution of our supply chain, it is difficult for us to identify actors upstream from our direct suppliers. We have determined that seeking information about 3TG smelters and refiners in our supply chain represents the most reasonable effort we can make to determine the mines or locations of origin of the 3TGs in our supply chain. This was done by adopting methodology outlined by the RMI's joint industry programs and outreach initiatives and requiring our suppliers to conform with the same standards to meet the OECD Guidelines, and report to us using the CMRT. Through this industry joint effort, we made a reasonable determination of the mines or locations of origin of the 3TGs in our supply chain. We also requested that all our suppliers support the initiative by following the sourcing initiative and working to align their declared sources with the lists of sourced metals certified by third party sources as "Known" and "Conflict Free".

We have identified 951 direct suppliers. We rely on suppliers whose materials or components contain 3TGs to provide us with information about the source of 3TGs contained in those materials or components. Our direct suppliers similarly rely upon information provided by their suppliers. Many of the largest suppliers either are Exchange Act registrants and subject to the Rule or are suppliers to other Exchange Act registrants that are subject to the Rule.

In accordance with OECD Guidelines, it is important to identify and assess risks associated with Conflict Minerals in the supply chain. Risks were identified by assessing the due diligence practices of smelters and refiners identified in the supply chain by upstream suppliers that listed mineral processing facilities on their CMRT declarations. Assent compared these facilities listed in the responses to the list of smelters and refiners maintained by the RMI to ensure that the facilities met the RMI definition of a 3TG processing facility that was operational during the 2019 calendar year.

To assess the risk that any of these smelters posed to our supply chain, Assent determined if the smelter had been audited against a standard in conformance with the OECD Guidance, such as the Responsible Minerals Assurance Process ("RMAP"). We do not typically have a direct relationship with 3TG smelters and refiners and do not perform or direct audits of these entities within our supply chain. Smelters that have completed an RMAP audit are considered to be DRC-Conflict Free. In cases where the smelter's due diligence practices have not been audited against the RMAP standard, a potential supply chain risk exists.

As of May 22, 2020, we have validated 307 smelters or refiners and are working to validate the additional smelter/refiner entries from the submitted CMRTs. Due to the provision of primarily supplier-level CMRTs, we cannot definitely determine their connection to the Covered Products.

Each facility that meets the RMI definition of a smelter or refiner of a 3TG mineral is assessed according to red flag indicators defined in the OECD Guidance. Five factors are used to determine the level of risk that each smelter poses to the supply chain:

- 1) Geographic proximity to the DRC and covered countries;
- 2) Known mineral source country of origin;
- 3) Responsible Minerals Assurance Process (RMAP) audit status;
- 4) Credible evidence of unethical or conflict sourcing; and
- 5) Peer Assessments conducted by credible third-party sources.

Based on these criteria the following facilities have been identified with red-flag risks in their supply chain:

- Tony Goetz NV - CID002587
- African Gold Refinery Limited (AGR) - CID003185

- Kaloti Precious Metals - CID002563
- Universal Precious Metals Refining Zambia - CID002854
- Sudan Gold Refinery - CID002567
- Fidelity Printers – CID002515

As part of our risk management plan under the OECD Guidance, when these facilities were reported on a CMRT by one of the suppliers surveyed, risk mitigation activities are initiated. Through our Assent Compliance, submissions that include any of the above facilities immediately produce a receipt instructing the supplier to take their own risk mitigation actions, including submission of a product specific CMRT to better identify the connection to products that they supply to the Company, and escalating up to removal of these red flag smelters from their supply chain.

As per the OECD Guidance, risk mitigation will depend on the supplier's specific context. Suppliers are given clear performance objectives within reasonable timeframes with the goal of progressive elimination of these red flags from the supply chain.

Suppliers are also evaluated on their Conflict Minerals program strength (further assisting in identifying risk in the supply chain). Evaluating and tracking the strength of such Conflict Minerals program can assist in making key risk mitigation decisions as the program progresses. The criteria used to evaluate the strength of the supplier's Conflict Minerals program are:

- Does the supplier have a Conflict Minerals policy in place that prohibits the procurement of 3TGs from sources that directly or indirectly finance or benefit armed groups in the Covered Countries?
- Has the supplier implemented due diligence measures to implement such policy?
- Does the supplier verify due diligence information received from its suppliers?
- Does the supplier's verification process include corrective action management?

When suppliers meet or exceed those criteria (Yes to at least A, E, G, H on the CMRT 5.12), they are deemed to have a strong program. When suppliers do not meet those criteria, they are deemed to have a weak program.

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

As per the OECD Guidance, risk mitigation will depend on the supplier's specific role in the supply chain. When a high-risk smelting facility is reported on a CMRT by a supplier surveyed, risk mitigation will include:

- Requesting the supplier to submit product specific CMRT to better identify the connection to products that they supply to the Company;
- Guiding suppliers to the Assent University learning platform to access educational materials on mitigating the risk of smelters or refiners on the supply chain; and
- If necessary, requesting all our suppliers whom we have reason to believe are supplying us with 3TGs from sources that may directly or indirectly finance or benefit armed groups in the Covered Countries to establish an alternative source of 3TGs that does not support such conflict, as provided in the OECD guidance. To date, we have found no instances where it was necessary to terminate a contract or find a replacement material or supplier for issues relating to Conflict Minerals.

3.4. Third-Party Audit of Supply Chain Due Diligence

As a downstream purchaser of 3TGs, our due diligence process is based on the necessity of relying on data obtained from our direct suppliers. We also rely on information collected and provided by other external audit programs. As such, we have not conducted third-party audits of any smelters or refiners.

Assent also directly contacts smelters and refiners that are not currently enrolled in the RMAP to encourage their participation and gather information regarding each facilities' sourcing practices on behalf of its

compliance partners. The Company is a signatory of this communication in accordance with the requirements of downstream companies detailed in the OECD Guidance.

3.5. Report on Supply Chain Due Diligence

This Conflict Minerals Report is on file with the SEC and is publicly available on our web site at

<https://www.entegris.com/content/dam/web/about-us/corporate-overview/documents/report-conflict-minerals.pdf>

4. Due Diligence Results

Attached as Appendix A is a list of all the smelters and refiners listed by our suppliers in their completed CMRTs that appear on the lists of smelters maintained by the RMI. Since many of the CMRTs we received from our suppliers were made on a company or division level basis, rather than on a product-level basis, we are not able to identify which smelters or refiners listed on Appendix A processed the 3TGs contained in our products. Therefore, our list of processing smelters and refiners disclosed in Appendix A may contain more facilities than those that processed the Conflict Minerals contained in our products. The current efforts focus on gathering smelter information via the CMRT and, as the program progresses, requiring full completion of all necessary smelter identification information which will enable the validation and disclosure of the smelters as well as the tracing of 3TGs to their location of origin. Seeking information about 3TG smelters and refiners in our supply chain represents the most reasonable effort we can make to determine the mines or locations of origin of 3TGs in our supply chain.

Certain of the responses provided by suppliers to the CMRT did include the names of facilities listed by the suppliers as smelters or refiners. We do not typically have a direct relationship with 3TG smelters and refiners and do not perform or direct audits of these entities within our supply chain. Assent Compliance, our third-party compliance partner, compared these facilities listed in the responses to the list of smelters maintained by the RMI and, if a supplier indicated that the facility was certified as “RMAP Conformant”, Assent Compliance confirmed that the facility was, in fact, listed as such by RMI.

As of May 22, 2020, we have validated 307 smelters or refiners and are working to validate the additional smelter and refiner entries from the submitted CMRTs. The table set forth on Appendix A to this CMR lists the valid smelters identified by suppliers we surveyed. Not all of these facilities have necessarily processed 3TGs contained in our products covered by this Conflict Minerals Report. This is because our suppliers generally provided information via the CMRT at the company or divisional level, and generally did not limit their CMRT responses to information relating to 3TGs in specific products supplied to us.

Based on the information provided by our suppliers in their CMRT's, we are aware that there are 235 smelters that are certified “Conflict-Free”, and 7 smelters are active in the RMAP third-party audit process. Many suppliers are still unable to provide the smelters or refiners used for materials supplied to us. Furthermore, many of the responses provided at the company or division level indicated an “unknown” status in terms of determining the origin of 3TGs.

Based on our due diligence, the products that we manufacture or contract to manufacture which contain 3TGs are classified as “DRC conflict undeterminable” in 2019 as information on sources remains incomplete at this time.

5. Additional Risk Mitigation Steps

In keeping with our commitment to continual improvement, our Product Stewardship Team performed a review of our internal program in the first quarter of 2020. Observations and recommendations have been summarized and integrated the Conflict Minerals Action Plan for the remainder of the year.

The Company intends to take the following steps to improve the RCOI and due diligence conducted to further identify and mitigate the risk that our products contain Conflict Minerals from sources that support conflict in the Covered Countries:

- Further collaboration with our third-party compliance partner, Assent, to raise supplier survey response rates, as well as implement best practice supplier education and engagement initiatives.
- Increase the response rate from our suppliers to 90%.
- Engage, as needed, with suppliers and direct them to training resources to increase knowledge, increase response rates, and improve the reliability of responses.
- Continue to work with the company supply chain managers to increase their understanding of the program and the need for continuous improvement.
- If applicable, upon learning of a supplier found to be supplying 3TGs from sources that support conflict in the Covered Countries, establish an alternative source that does not support such conflict.
- Continue to monitor the OECD and relevant trade associations to incorporate best practices to improve our processes and leverage our supply chain in accordance with OECD Guidance.
- Investigate and act on recommendations from our internal review process.

Appendix A

| Metal | Standard Smelter Name | Smelter Facility Location | Smelter ID |
|-------|---|---------------------------|------------|
| Gold | 8853 S.p.A. | ITALY | CID002763 |
| Gold | Abington Reldan Metals, LLC | UNITED STATES OF AMERICA | CID002708 |
| Gold | Advanced Chemical Company | UNITED STATES OF AMERICA | CID000015 |
| Gold | African Gold Refinery | UGANDA | CID003185 |
| Gold | Aida Chemical Industries Co., Ltd. | JAPAN | CID000019 |
| Gold | Al Etihad Gold Refinery DMCC | UNITED ARAB EMIRATES | CID002560 |
| Gold | Allgemeine Gold-und Silberscheideanstalt A.G. | GERMANY | CID000035 |
| Gold | Almalyk Mining and Metallurgical Complex (AMMC) | UZBEKISTAN | CID000041 |
| Gold | AngloGold Ashanti Corrego do Sitio Mineracao | BRAZIL | CID000058 |
| Gold | Argor-Heraeus S.A. | SWITZERLAND | CID000077 |
| Gold | Asahi Pretec Corp. | JAPAN | CID000082 |
| Gold | Asahi Refining Canada Ltd. | CANADA | CID000924 |
| Gold | Asahi Refining USA Inc. | UNITED STATES OF AMERICA | CID000920 |
| Gold | Asaka Riken Co., Ltd. | JAPAN | CID000090 |
| Gold | Atasay Kuyumculuk Sanayi Ve Ticaret A.S. | TURKEY | CID000103 |
| Gold | AU Traders and Refiners | SOUTH AFRICA | CID002850 |
| Gold | Aurubis AG | GERMANY | CID000113 |
| Gold | Bangalore Refinery | INDIA | CID002863 |
| Gold | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | PHILIPPINES | CID000128 |
| Gold | Boliden AB | SWEDEN | CID000157 |
| Gold | C. Hafner GmbH + Co. KG | GERMANY | CID000176 |
| Gold | C.I Metales Procesados Industriales SAS | COLOMBIA | CID003421 |
| Gold | Caridad | MEXICO | CID000180 |
| Gold | CCR Refinery - Glencore Canada Corporation | CANADA | CID000185 |
| Gold | Cendres + Metaux S.A. | SWITZERLAND | CID000189 |
| Gold | CGR Metalloys Pvt Ltd. | INDIA | CID003382 |
| Gold | Chimet S.p.A. | ITALY | CID000233 |
| Gold | Chugai Mining | JAPAN | CID000264 |
| Gold | Daye Non-Ferrous Metals Mining Ltd. | CHINA | CID000343 |

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| Gold | Degussa Sonne / Mond Goldhandel GmbH | GERMANY | CID002867 |
| Gold | Dijllah Gold Refinery FZC | UNITED ARAB EMIRATES | CID003348 |
| Gold | DODUCO Contacts and Refining GmbH | GERMANY | CID000362 |
| Gold | Dowa | JAPAN | CID000401 |
| Gold | DS PRETECH Co., Ltd. | KOREA, REPUBLIC OF | CID003195 |
| Gold | DSC (Do Sung Corporation) | KOREA, REPUBLIC OF | CID000359 |
| Gold | Eco-System Recycling Co., Ltd. East Plant | JAPAN | CID000425 |
| Gold | Eco-System Recycling Co., Ltd. North Plant | JAPAN | CID003424 |
| Gold | Eco-System Recycling Co., Ltd. West Plant | JAPAN | CID003425 |
| Gold | Emirates Gold DMCC | UNITED ARAB EMIRATES | CID002561 |
| Gold | Fidelity Printers and Refiners Ltd. | ZIMBABWE | CID002515 |
| Gold | Fujairah Gold FZC | UNITED ARAB EMIRATES | CID002584 |
| Gold | GCC Gujrat Gold Centre Pvt. Ltd. | INDIA | CID002852 |
| Gold | Geib Refining Corporation | UNITED STATES OF AMERICA | CID002459 |
| Gold | Gold Coast Refinery | GHANA | CID003186 |
| Gold | Gold Refinery of Zijin Mining Group Co., Ltd. | CHINA | CID002243 |
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM | CHINA | CID001909 |
| Gold | Guangdong Jinding Gold Limited | CHINA | CID002312 |
| Gold | Guoda Safina High-Tech Environmental Refinery Co., Ltd. | CHINA | CID000651 |
| Gold | Hangzhou Fuchunjiang Smelting Co., Ltd. | CHINA | CID000671 |
| Gold | Heimerle + Meule GmbH | GERMANY | CID000694 |
| Gold | Heraeus Metals Hong Kong Ltd. | CHINA | CID000707 |
| Gold | Heraeus Precious Metals GmbH & Co. KG | GERMANY | CID000711 |
| Gold | Hunan Chenzhou Mining Co., Ltd. | CHINA | CID000767 |
| Gold | Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd. | CHINA | CID000773 |
| Gold | HwaSeong CJ CO., LTD. | KOREA, REPUBLIC OF | CID000778 |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | CHINA | CID000801 |
| Gold | International Precious Metal Refiners | UNITED ARAB EMIRATES | CID002562 |
| Gold | Ishifuku Metal Industry Co., Ltd. | JAPAN | CID000807 |
| Gold | Istanbul Gold Refinery | TURKEY | CID000814 |
| Gold | Italpreziosi | ITALY | CID002765 |
| Gold | JALAN & Company | INDIA | CID002893 |
| Gold | Japan Mint | JAPAN | CID000823 |
| Gold | Jiangxi Copper Co., Ltd. | CHINA | CID000855 |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant | RUSSIAN FEDERATION | CID000927 |
| Gold | JSC Uralelectromed | RUSSIAN FEDERATION | CID000929 |
| Gold | JX Nippon Mining & Metals Co., Ltd. | JAPAN | CID000937 |
| Gold | Kaloti Precious Metals | UNITED ARAB EMIRATES | CID002563 |
| Gold | Kazakhmys Smelting LLC | KAZAKHSTAN | CID000956 |
| Gold | Kazzinc | KAZAKHSTAN | CID000957 |
| Gold | Kennecott Utah Copper LLC | UNITED STATES OF AMERICA | CID000969 |
| Gold | KGHM Polska Miedz Spolka Akcyjna | POLAND | CID002511 |
| Gold | Kojima Chemicals Co., Ltd. | JAPAN | CID000981 |
| Gold | Korea Zinc Co., Ltd. | KOREA, REPUBLIC OF | CID002605 |
| Gold | Kundan Care Products Ltd. | INDIA | CID003463 |
| Gold | Kyrgyzaltyn JSC | KYRGYZSTAN | CID001029 |
| Gold | Kyshtym Copper-Electrolytic Plant ZAO | RUSSIAN FEDERATION | CID002865 |
| Gold | L'azurde Company For Jewelry | SAUDI ARABIA | CID001032 |

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| Gold | Lingbao Gold Co., Ltd. | CHINA | CID001056 |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd. | CHINA | CID001058 |
| Gold | L'Orfebre S.A. | ANDORRA | CID002762 |
| Gold | LS-NIKKO Copper Inc. | KOREA, REPUBLIC OF | CID001078 |
| Gold | LT Metal Ltd. | KOREA, REPUBLIC OF | CID000689 |
| Gold | Luoyang Zijin Yinhui Gold Refinery Co., Ltd. | CHINA | CID001093 |
| Gold | Marsam Metals | BRAZIL | CID002606 |
| Gold | Materion | UNITED STATES OF AMERICA | CID001113 |
| Gold | Matsuda Sangyo Co., Ltd. | JAPAN | CID001119 |
| Gold | Metalor Technologies (Hong Kong) Ltd. | CHINA | CID001149 |
| Gold | Metalor Technologies (Singapore) Pte., Ltd. | SINGAPORE | CID001152 |
| Gold | Metalor Technologies (Suzhou) Ltd. | CHINA | CID001147 |
| Gold | Metalor Technologies S.A. | SWITZERLAND | CID001153 |
| Gold | Metalor USA Refining Corporation | UNITED STATES OF AMERICA | CID001157 |
| Gold | Metalurgica Met-Mex Penoles S.A. De C.V. | MEXICO | CID001161 |
| Gold | Mitsubishi Materials Corporation | JAPAN | CID001188 |
| Gold | Mitsui Mining and Smelting Co., Ltd. | JAPAN | CID001193 |
| Gold | MMTC-PAMP India Pvt., Ltd. | INDIA | CID002509 |
| Gold | Modeltech Sdn Bhd | MALAYSIA | CID002857 |
| Gold | Morris and Watson | NEW ZEALAND | CID002282 |
| Gold | Moscow Special Alloys Processing Plant | RUSSIAN FEDERATION | CID001204 |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.S. | TURKEY | CID001220 |
| Gold | Navoi Mining and Metallurgical Combinat | UZBEKISTAN | CID001236 |
| Gold | NH Recytech Company | KOREA, REPUBLIC OF | CID003189 |
| Gold | Nihon Material Co., Ltd. | JAPAN | CID001259 |
| Gold | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH | AUSTRIA | CID002779 |
| Gold | Ohura Precious Metal Industry Co., Ltd. | JAPAN | CID001325 |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | RUSSIAN FEDERATION | CID001326 |
| Gold | OJSC Novosibirsk Refinery | RUSSIAN FEDERATION | CID000493 |
| Gold | PAMP S.A. | SWITZERLAND | CID001352 |
| Gold | Pease & Curren | UNITED STATES OF AMERICA | CID002872 |
| Gold | Penglai Penggang Gold Industry Co., Ltd. | CHINA | CID001362 |
| Gold | Planta Recuperadora de Metales SpA | CHILE | CID002919 |
| Gold | Prioksky Plant of Non-Ferrous Metals | RUSSIAN FEDERATION | CID001386 |
| Gold | PT Aneka Tambang (Persero) Tbk | INDONESIA | CID001397 |
| Gold | PX Precinox S.A. | SWITZERLAND | CID001498 |
| Gold | QG Refining, LLC | UNITED STATES OF AMERICA | CID003324 |
| Gold | Rand Refinery (Pty) Ltd. | SOUTH AFRICA | CID001512 |
| Gold | Refinery of Seemine Gold Co., Ltd. | CHINA | CID000522 |
| Gold | REMONDIS PMR B.V. | NETHERLANDS | CID002582 |
| Gold | Royal Canadian Mint | CANADA | CID001534 |
| Gold | SAAMP | FRANCE | CID002761 |
| Gold | Sabin Metal Corp. | UNITED STATES OF AMERICA | CID001546 |
| Gold | Safimet S.p.A | ITALY | CID002973 |
| Gold | SAFINA A.S. | CZECH REPUBLIC | CID002290 |
| Gold | Sai Refinery | INDIA | CID002853 |
| Gold | Samduck Precious Metals | KOREA, REPUBLIC OF | CID001555 |
| Gold | Samwon Metals Corp. | KOREA, REPUBLIC OF | CID001562 |

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| Gold | SAXONIA Edelmetalle GmbH | GERMANY | CID002777 |
| Gold | SEMPSA Joyeria Plateria S.A. | SPAIN | CID001585 |
| Gold | Shandong Humon Smelting Co., Ltd. | CHINA | CID002525 |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | CHINA | CID001619 |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd. | CHINA | CID001622 |
| Gold | Shirpur Gold Refinery Ltd. | INDIA | CID002588 |
| Gold | Sichuan Tianze Precious Metals Co., Ltd. | CHINA | CID001736 |
| Gold | Singway Technology Co., Ltd. | TAIWAN, PROVINCE OF CHINA | CID002516 |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals | RUSSIAN FEDERATION | CID001756 |
| Gold | Solar Applied Materials Technology Corp. | TAIWAN, PROVINCE OF CHINA | CID001761 |
| Gold | Sovereign Metals | INDIA | CID003383 |
| Gold | State Research Institute Center for Physical Sciences and Technology | LITHUANIA | CID003153 |
| Gold | Sudan Gold Refinery | SUDAN | CID002567 |
| Gold | Sumitomo Metal Mining Co., Ltd. | JAPAN | CID001798 |
| Gold | SungEel HiMetal Co., Ltd. | KOREA, REPUBLIC OF | CID002918 |
| Gold | T.C.A S.p.A | ITALY | CID002580 |
| Gold | Tanaka Kikinzoku Kogyo K.K. | JAPAN | CID001875 |
| Gold | The Refinery of Shandong Gold Mining Co., Ltd. | CHINA | CID001916 |
| Gold | Tokuriki Honten Co., Ltd. | JAPAN | CID001938 |
| Gold | Tongling Nonferrous Metals Group Co., Ltd. | CHINA | CID001947 |
| Gold | Tony Goetz NV | BELGIUM | CID002587 |
| Gold | TOO Tau-Ken-Altyr | KAZAKHSTAN | CID002615 |
| Gold | Torecom | KOREA, REPUBLIC OF | CID001955 |
| Gold | Umicore Brasil Ltda. | BRAZIL | CID001977 |
| Gold | Umicore Precious Metals Thailand | THAILAND | CID002314 |
| Gold | Umicore S.A. Business Unit Precious Metals Refining | BELGIUM | CID001980 |
| Gold | United Precious Metal Refining, Inc. | UNITED STATES OF AMERICA | CID001993 |
| Gold | Valcambi S.A. | SWITZERLAND | CID002003 |
| Gold | Western Australian Mint (T/a The Perth Mint) | AUSTRALIA | CID002030 |
| Gold | WIELAND Edelmetalle GmbH | GERMANY | CID002778 |
| Gold | Yamakin Co., Ltd. | JAPAN | CID002100 |
| Gold | Yokohama Metal Co., Ltd. | JAPAN | CID002129 |
| Gold | Yunnan Copper Industry Co., Ltd. | CHINA | CID000197 |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | CHINA | CID002224 |
| Tantalum | Asaka Riken Co., Ltd. | JAPAN | CID000092 |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd. | CHINA | CID000211 |
| Tantalum | CP Metals Inc. | UNITED STATES OF AMERICA | CID003402 |
| Tantalum | D Block Metals, LLC | UNITED STATES OF AMERICA | CID002504 |
| Tantalum | Exotech Inc. | UNITED STATES OF AMERICA | CID000456 |
| Tantalum | F&X Electro-Materials Ltd. | CHINA | CID000460 |
| Tantalum | FIR Metals & Resource Ltd. | CHINA | CID002505 |
| Tantalum | Global Advanced Metals Aizu | JAPAN | CID002558 |
| Tantalum | Global Advanced Metals Boyertown | UNITED STATES OF AMERICA | CID002557 |
| Tantalum | Guangdong Zhiyuan New Material Co., Ltd. | CHINA | CID000616 |
| Tantalum | H.C. Starck Co., Ltd. | THAILAND | CID002544 |
| Tantalum | H.C. Starck Hermsdorf GmbH | GERMANY | CID002547 |
| Tantalum | H.C. Starck Inc. | UNITED STATES OF AMERICA | CID002548 |
| Tantalum | H.C. Starck Ltd. | JAPAN | CID002549 |

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| Tantalum | H.C. Starck Smelting GmbH & Co. KG | GERMANY | CID002550 |
| Tantalum | H.C. Starck Tantalum and Niobium GmbH | GERMANY | CID002545 |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd. | CHINA | CID002492 |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd. | CHINA | CID002512 |
| Tantalum | Jiangxi Tuohong New Raw Material | CHINA | CID002842 |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd. | CHINA | CID000914 |
| Tantalum | Jiujiang Tanbre Co., Ltd. | CHINA | CID000917 |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd. | CHINA | CID002506 |
| Tantalum | KEMET Blue Metals | MEXICO | CID002539 |
| Tantalum | LSM Brasil S.A. | BRAZIL | CID001076 |
| Tantalum | Metallurgical Products India Pvt., Ltd. | INDIA | CID001163 |
| Tantalum | Mineracao Taboca S.A. | BRAZIL | CID001175 |
| Tantalum | Mitsui Mining and Smelting Co., Ltd. | JAPAN | CID001192 |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd. | CHINA | CID001277 |
| Tantalum | NPM Silmet AS | ESTONIA | CID001200 |
| Tantalum | PRG Dooel | NORTH MACEDONIA, REPUBLIC OF | CID002847 |
| Tantalum | QuantumClean | UNITED STATES OF AMERICA | CID001508 |
| Tantalum | Resind Industria e Comercio Ltda. | BRAZIL | CID002707 |
| Tantalum | Solikamsk Magnesium Works OAO | RUSSIAN FEDERATION | CID001769 |
| Tantalum | Taki Chemical Co., Ltd. | JAPAN | CID001869 |
| Tantalum | Telex Metals | UNITED STATES OF AMERICA | CID001891 |
| Tantalum | Ulba Metallurgical Plant JSC | KAZAKHSTAN | CID001969 |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd. | CHINA | CID002508 |
| Tantalum | Yanling Jincheng Tantalum & Niobium Co., Ltd. | CHINA | CID001522 |
| Tin | Alpha | UNITED STATES OF AMERICA | CID000292 |
| Tin | An Vinh Joint Stock Mineral Processing Company | VIET NAM | CID002703 |
| Tin | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | CHINA | CID000228 |
| Tin | Chifeng Dajingzi Tin Industry Co., Ltd. | CHINA | CID003190 |
| Tin | China Tin Group Co., Ltd. | CHINA | CID001070 |
| Tin | Dongguan CiEXPO Environmental Engineering Co., Ltd. | CHINA | CID003356 |
| Tin | Dowa | JAPAN | CID000402 |
| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | VIET NAM | CID002572 |
| Tin | EM Vinto | BOLIVIA (PLURINATIONAL STATE OF) | CID000438 |
| Tin | Estanho de Rondonia S.A. | BRAZIL | CID000448 |
| Tin | Fenix Metals | POLAND | CID000468 |
| Tin | Gejiu City Fuxiang Industry and Trade Co., Ltd. | CHINA | CID003410 |
| Tin | Gejiu Kai Meng Industry and Trade LLC | CHINA | CID000942 |
| Tin | Gejiu Non-Ferrous Metal Processing Co., Ltd. | CHINA | CID000538 |
| Tin | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | CHINA | CID001908 |
| Tin | Gejiu Zili Mining And Metallurgy Co., Ltd. | CHINA | CID000555 |
| Tin | Guangdong Hanhe Non-Ferrous Metal Co., Ltd. | CHINA | CID003116 |
| Tin | Guanyang Guida Nonferrous Metal Smelting Plant | CHINA | CID002849 |
| Tin | HuiChang Hill Tin Industry Co., Ltd. | CHINA | CID002844 |
| Tin | Huichang Jinshunda Tin Co., Ltd. | CHINA | CID000760 |
| Tin | Jiangxi New Nanshan Technology Ltd. | CHINA | CID001231 |
| Tin | Luna Smelter, Ltd. | RWANDA | CID003387 |
| Tin | Ma'anshan Weitai Tin Co., Ltd. | CHINA | CID003379 |
| Tin | Magnu's Minerais Metais e Ligas Ltda. | BRAZIL | CID002468 |

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| Tin | Malaysia Smelting Corporation (MSC) | MALAYSIA | CID001105 |
| Tin | Melt Metais e Ligas S.A. | BRAZIL | CID002500 |
| Tin | Metallic Resources, Inc. | UNITED STATES OF AMERICA | CID001142 |
| Tin | Metallo Belgium N.V. | BELGIUM | CID002773 |
| Tin | Metallo Spain S.L.U. | SPAIN | CID002774 |
| Tin | Mineracao Taboca S.A. | BRAZIL | CID001173 |
| Tin | Minsur | PERU | CID001182 |
| Tin | Mitsubishi Materials Corporation | JAPAN | CID001191 |
| Tin | Modeltech Sdn Bhd | MALAYSIA | CID002858 |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company | VIET NAM | CID002573 |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd. | THAILAND | CID001314 |
| Tin | O.M. Manufacturing Philippines, Inc. | PHILIPPINES | CID002517 |
| Tin | Operaciones Metalurgicas S.A. | BOLIVIA (PLURINATIONAL STATE OF) | CID001337 |
| Tin | Pongpipat Company Limited | MYANMAR | CID003208 |
| Tin | Precious Minerals and Smelting Limited | INDIA | CID003409 |
| Tin | PT Artha Cipta Langgeng | INDONESIA | CID001399 |
| Tin | PT ATD Makmur Mandiri Jaya | INDONESIA | CID002503 |
| Tin | PT Menara Cipta Mulia | INDONESIA | CID002835 |
| Tin | PT Mitra Stania Prima | INDONESIA | CID001453 |
| Tin | PT Refined Bangka Tin | INDONESIA | CID001460 |
| Tin | PT Timah Tbk Kundur | INDONESIA | CID001477 |
| Tin | PT Timah Tbk Mentok | INDONESIA | CID001482 |
| Tin | Resind Industria e Comercio Ltda. | BRAZIL | CID002706 |
| Tin | Rui Da Hung | TAIWAN, PROVINCE OF CHINA | CID001539 |
| Tin | Soft Metais Ltda. | BRAZIL | CID001758 |
| Tin | Super Ligas | BRAZIL | CID002756 |
| Tin | Thai Nguyen Mining and Metallurgy Co., Ltd. | VIET NAM | CID002834 |
| Tin | Thaisarco | THAILAND | CID001898 |
| Tin | Tin Technology & Refining | UNITED STATES OF AMERICA | CID003325 |
| Tin | Tuyen Quang Non-Ferrous Metals Joint Stock Company | VIET NAM | CID002574 |
| Tin | White Solder Metalurgia e Mineracao Ltda. | BRAZIL | CID002036 |
| Tin | Yunnan Chengfeng Non-ferrous Metals Co., Ltd. | CHINA | CID002158 |
| Tin | Yunnan Tin Company Limited | CHINA | CID002180 |
| Tin | Yunnan Yunfan Non-ferrous Metals Co., Ltd. | CHINA | CID003397 |
| Tungsten | A.L.M.T. Corp. | JAPAN | CID000004 |
| Tungsten | ACL Metais Eireli | BRAZIL | CID002833 |
| Tungsten | Albasteel Industria e Comercio de Ligas Para Fundicao Ltd. | BRAZIL | CID003427 |
| Tungsten | Asia Tungsten Products Vietnam Ltd. | VIET NAM | CID002502 |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd. | CHINA | CID002513 |
| Tungsten | China Molybdenum Co., Ltd. | CHINA | CID002641 |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd. | CHINA | CID000258 |
| Tungsten | CNMC (Guangxi) PGMA Co., Ltd. | CHINA | CID000281 |
| Tungsten | CP Metals Inc. | UNITED STATES OF AMERICA | CID003448 |
| Tungsten | Fujian Ganmin RareMetal Co., Ltd. | CHINA | CID003401 |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd. | CHINA | CID000499 |
| Tungsten | Ganzhou Haichuang Tungsten Co., Ltd. | CHINA | CID002645 |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd. | CHINA | CID000875 |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd. | CHINA | CID002315 |

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| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd. | CHINA | CID002494 |
| Tungsten | GEM Co., Ltd. | CHINA | CID003417 |
| Tungsten | Global Tungsten & Powders Corp. | UNITED STATES OF AMERICA | CID000568 |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd. | CHINA | CID000218 |
| Tungsten | H.C. Starck Smelting GmbH & Co. KG | GERMANY | CID002542 |
| Tungsten | H.C. Starck Tungsten GmbH | GERMANY | CID002541 |
| Tungsten | Hunan Chenzhou Mining Co., Ltd. | CHINA | CID000766 |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji | CHINA | CID002579 |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd. | CHINA | CID000769 |
| Tungsten | Hunan Litian Tungsten Industry Co., Ltd. | CHINA | CID003182 |
| Tungsten | Hydrometallurg, JSC | RUSSIAN FEDERATION | CID002649 |
| Tungsten | Japan New Metals Co., Ltd. | JAPAN | CID000825 |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd. | CHINA | CID002551 |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd. | CHINA | CID002321 |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. | CHINA | CID002313 |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | CHINA | CID002318 |
| Tungsten | Jiangxi Xianglu Tungsten Co., Ltd. | CHINA | CID002647 |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd. | CHINA | CID002317 |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd. | CHINA | CID002316 |
| Tungsten | JSC "Kirovgrad Hard Alloys Plant" | RUSSIAN FEDERATION | CID003408 |
| Tungsten | Kennametal Fallon | UNITED STATES OF AMERICA | CID000966 |
| Tungsten | Kennametal Huntsville | UNITED STATES OF AMERICA | CID000105 |
| Tungsten | KGETS Co., Ltd. | KOREA, REPUBLIC OF | CID003388 |
| Tungsten | Lianyou Metals Co., Ltd. | TAIWAN, PROVINCE OF CHINA | CID003407 |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd. | CHINA | CID002319 |
| Tungsten | Masan Tungsten Chemical LLC (MTC) | VIET NAM | CID002543 |
| Tungsten | Moliren Ltd. | RUSSIAN FEDERATION | CID002845 |
| Tungsten | Niagara Refining LLC | UNITED STATES OF AMERICA | CID002589 |
| Tungsten | NPP Tyazhmetprom LLC | RUSSIAN FEDERATION | CID003416 |
| Tungsten | Philippine Chuangxin Industrial Co., Inc. | PHILIPPINES | CID002827 |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd. | VIET NAM | CID001889 |
| Tungsten | Unecha Refractory metals plant | RUSSIAN FEDERATION | CID002724 |
| Tungsten | Wolfram Bergbau und Hutten AG | AUSTRIA | CID002044 |
| Tungsten | Woltech Korea Co., Ltd. | KOREA, REPUBLIC OF | CID002843 |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd. | CHINA | CID002320 |
| Tungsten | Xiamen Tungsten Co., Ltd. | CHINA | CID002082 |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd. | CHINA | CID002830 |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd. | CHINA | CID002095 |