

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

**FORM SD  
SPECIALIZED DISCLOSURE REPORT**

**American Superconductor Corporation**

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

**Delaware**

**0-19672**

**04-2959321**

(State or other jurisdiction of  
incorporation or organization)

(Commission  
File Number)

(IRS Employer  
Identification No.)

**114 East Main Street,  
Ayer, Massachusetts**

**01432**

(Address of principal executive offices)

(Zip code)

**(978) 842-3000**

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

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

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2017.

Under the final rule, a company that uses any of the designated minerals is required to conduct a reasonable 'country of origin' inquiry that must be performed in good faith and be reasonably designed to determine whether any of its minerals originated in the covered countries or are from scrap or recycled sources.

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**Section 1 – Conflict Minerals Disclosure**

**ITEM 1.01 – Conflicts Minerals Disclosure and Report**

**Conflict Minerals Disclosure**

A copy of The Company’s Conflict Minerals Report is provided as Exhibit 1.01 hereto and is publicly available at <http://ir.amsc.com/governance.cfm>

**ITEM 1.02 – Exhibit**

**Exhibit 1.01 – Conflict Minerals Report is attached per Section 1.**

**Section 2 – Exhibits**

**Item 2.01 Exhibits**

Exhibit 1.01 – Conflict Minerals Report as required by Item 1.01 and 1.02 of this Form.

**SIGNATURES**

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

American Superconductor Corporation  
(Registrant)

/s/ John W. Kosiba, Jr.  
By John W. Kosiba, Jr., Senior Vice President and Chief Financial Officer

May 25, 2018  
(Date)



## AMSC CONFLICT MINERALS REPORT

For the year ended December 31, 2017

### *INTRODUCTION AND SUMMARY*

This AMSC Conflict Minerals Report (this “Report”) has been prepared in accordance with Section 13(p) of the Securities Exchange Act of 1934, as amended (the “Exchange Act”) and Rule 13p-1 (the “Rule”) promulgated thereunder, for the reporting period from January 1, 2017 to December 31, 2017.

This Report relates to the process undertaken for AMSC products that were manufactured during calendar year 2017 and that contain or are believed to contain conflict minerals that are necessary to the functionality or production of our products. The term “conflict minerals” is defined in Section 13(p) of the Exchange Act as (A) cassiterite, columbite-tantalite (coltan), gold, wolframite, and their derivatives, as limited by the Rule, tin, tantalum, tungsten, and gold (the “3TGs”); or (B) any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of Congo (“DRC”) or any adjoining country that shares an internationally recognized border with the DRC. This Report includes a discussion of our conflict minerals program, reasonable country of origin inquiry (“RCOI”), due diligence procedures performed, and the disclosures required by the Securities and Exchange Commission (the “SEC”). AMSC is required to file this Report with the SEC because based on our RCOI and further due diligence, we have reason to believe that the 3TGs used in our products may originate in the DRC or certain countries that share an internationally-recognized border with the DRC and that they may not be from recycled or scrap sources. The adjoining countries are: the Republic of the Congo, Angola, Burundi, Central African Republic, Rwanda, Tanzania, Uganda, and Zambia (together with the DRC, the “Covered Countries”).

Based on its assessment of survey responses received from our suppliers, AMSC determined that the majority of the materials used in the production of its products do not contain 3TGs sourced from the Covered Countries. However, from our RCOI we could not determine that the remainder of the 3TGs used in the production of our products did not originate from the Covered Countries.

### *COMPANY OVERVIEW*

American Superconductor Corporation (together with its subsidiaries, “AMSC ®” or the “Company”) was founded on April 9, 1987. We are a leading provider of megawatt-scale solutions that lower the cost of wind power and enhance the performance of the power grid. In the wind power market, we enable manufacturers to field highly competitive wind turbines through our advanced power electronics products, engineering, and support services. In the power grid market, we enable electric utilities, industrial facilities, and renewable energy project developers to connect, transmit and distribute power through our transmission planning services and power electronics, and superconductor-based products. Our wind and power grid products and services provide exceptional reliability, security, efficiency, and affordability to our customers.

### *PRODUCT DESCRIPTIONS*

We segment our operations into two market-facing business units: Wind and Grid.

- *Wind.* Through our Windtec Solutions™, our Wind business segment enables manufacturers to field wind turbines with exceptional power output, reliability, and affordability. We supply advanced power electronics and control systems, license our highly engineered wind turbine designs, and provide extensive customer support services to wind turbine manufacturers. Our design portfolio includes a broad range of drive trains and power ratings of 2 megawatts (“MW”) and higher. We provide a broad range of power electronics and software-based control systems that are highly integrated and designed for optimized performance, efficiency, and grid compatibility.
- *Grid.* Through our Gridtec Solutions™, our Grid business segment enables electric utilities and renewable energy project developers to connect, transmit and distribute power with exceptional efficiency, reliability, security and affordability. We provide planning services that allow us to identify power grid congestion, poor power quality, and other risks, which help us, determine how our solutions can improve network performance. These services often lead to sales of our grid interconnection solutions for wind farms and solar power plants, power quality systems and transmission and distribution cable systems. We also sell ship protection products to the U.S. Navy.

We have determined that virtually all of our products may contain 3TGs.

The Company has disclosed the information above, along with a copy of this Report, publicly on its website, <http://ir.amsc.com/governance.cfm>.

### ***RCOI***

The Conflict Mineral Rule requires us to conduct in good faith an RCOI reasonably designed to determine whether any of our 3TGs originated in the Covered Countries, are from recycled or scrap sources. Phase one of our conflict minerals compliance program included a comprehensive screening of our product families. This screening, which mainly consisted of a detailed engineering review of our bill of materials, determined that virtually all of our products may contain 3TGs.

Phase two of our conflict minerals compliance program included AMSC engineers’ conducting a detailed bill of material review to ascertain if any of our components contain, or are believed to contain, 3TGs. All parts identified through the screening and detailed bill of material review, including purchased components, are screened and reviewed as described below.

To determine whether any 3TGs in our products originated in the Covered Countries, we retained a third-party service provider, Assent Compliance (“Assent”), to assist us in collecting and reviewing data from our supply chain. Suppliers of purchased parts or components that are believed to contain 3TG via the engineering reviews described above and survey are required by the supply chain to disclose the source of origin using the RBA-GeSI Conflict Minerals Reporting Template (“CMRT”) detailing the unique smelter ID number of every source of material procured.

Disclosure requests are first requested of suppliers based on delivery quantities from the supplier in addition to the period deliveries were received. Current products manufactured in the last year and related deliveries are prioritized based on quantities used in production and the likelihood suppliers are available to respond. Responses received from suppliers in North America continue to be generally more complete and often indicate that they are more conflict free than those from other parts of the world. Due to the unpredictability of response rates and the completeness of the responses, the Company

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continues to update its due diligence process to assure the highest response rate and most valid answers reasonably possible. Our efforts to achieve complete transparency in our supply chain are made more difficult due to the fact that a significant portion of our supply chain is not required to file reports with the SEC under Sections 13(a) or 14(b) of the Exchange Act, and is therefore not concerned by reporting obligations pursuant to Rule 13p-1 thereunder.

We contacted our suppliers via the Assent Compliance Manager, a SaaS platform provided by Assent that enables its users to complete and track supplier communications and allows suppliers to upload completed CMRTs forms directly to the platform for assessment, reporting and management. Assent requested that suppliers complete the Conflict Minerals Reporting Template “CMRT” forms and included training and education on the completion of the CMRT form in its electronic communications to suppliers. Assent monitored and tracked all of these communications in Assent’s system for future reporting and transparency.

Assent periodically informed the Company of the response rate of suppliers during the inquiry process. AMSC directly contacted suppliers that were unresponsive to Assent’s communications during the RCOI and requested such suppliers to complete the CMRT and submit such form to Assent. Suppliers requesting additional information regarding the CMRT were encouraged to review informational materials prepared by Assent and to contact Assent with further questions.

Our program continues to include automated data validation on all submitted CMRTs. The goal of data validation is to increase the accuracy of submissions and identify any contradictory answers in the CMRT. This data validation is based on:

- Questions 1 and 2 are minimum requirements for the CMRT
  - If suppliers state (via Q1 and Q2) that their products do not contain 3TGs necessary to the function or production of said products, then no further information is required and no further data validation is completed.
- Question 3 – Do any of your 3TGs originate from the covered countries?
  - Any supplier that has any 3TGs from the covered countries, even 1 positive response from their supply chain must answer yes.
- Question 4– is 100% of the 3TG in question from a recycled source?
- Question 5 – Have you received info from all relevant 3TG Suppliers?
  - If you are not at 100%, then you can’t make definitive statements for Questions 3, 4 and 6
- Question 6 – Have you identified all your Smelters and refiners?
  - If the answer here is yes, then question 5 must be yes. This also impacts question 3.

All submitted forms are accepted and classified as valid or invalid so that data is retained. Suppliers are contacted in regard to invalid forms and are encouraged to submit a valid form.

## DESIGN OF DUE DILIGENCE

AMSC undertook due diligence on the source and chain of custody of the 3TG has been designed to conform to the Organization of Economic Cooperation and Development “OECD” Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas (Second Edition) (including the supplements on Gold and on Tin, Tungsten and Tantalum) (“OECD Guidance”) being adopted, and described below.

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We developed our due diligence process to address each of the five steps as outlined by the OECD Guidance, 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.

## DUE DILIGENCE PERFORMED

### *Step 1: Company Management System*

#### Internal Team

Senior management is involved with the overall execution of our program. The team consists mainly of members of the Procurement and Sourcing team. This team is responsible for providing all supplier data to Assent and coordination of issues and other tasks that may arise. The team is also responsible for following up with non-responsive suppliers. The team also reviews along with senior management and the Director of Internal Audit, periodic progress and status reports provided by Assent.

#### Control Systems

The Company expects all of its suppliers to have policies and procedures in place to ensure that any 3TGs used in the production of the products sold to AMSC are DRC conflict-free. This means that the products must not contain 3TGs that directly or indirectly finance or benefit armed groups in the Covered Countries. These expectations are communicated directly to suppliers.

Other controls include, but are not limited to, our Code of Business Conduct and Ethics that outlines certain expected behaviors for all employees. In addition, we rely on our direct suppliers to provide information on the origin of the 3TG contained in components and materials supplied to us – including sources of 3TG that are supplied to them from lower tier suppliers.

#### Supplier Engagement

Suppliers requiring outreach for reasons such as unresponsiveness response or other matters are called, emailed and written to. Every effort possible is made to contact and manage issues with suppliers. Suppliers not responding are dealt with as a risk to the company and are subject to our termination of relationship with the supplier.

We continue to put a strong emphasis on supplier education and training. To accomplish this, we utilized Assent's learning management system, Assent University, to enroll all our in-scope suppliers in Conflict Minerals training courses. All training is tracked and evaluated based on completion.

#### Grievance Mechanism

AMSC maintains a Global Hotline and an intranet based Hotline reporting portal for all employees. The Hotline is available for use with respect to conflict minerals. An independent company (the, "Contractor") receives calls and electronically submitted tips and issues. The Contractor will notify the President, CFO, General Counsel, and Chair of the Audit Committee of the Board of Directors of any calls or other submissions. Upon notification, we evaluate the best method of investigation, evaluation, and if required resolution of any matters. A quarterly report of any activity received by the Contractor is also provided to us and further disclosed and if required reviewed by the Audit Committee during their quarterly meetings.

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## Maintain Records

Our Service Provider retains conflict minerals related documents, including supplier responses to CMRTs. This information is stored in a database hosted by our Service Provider.

### *Step 2: Identifying and Assessing Risks in Our Supply Chain*

To identify and assess risks in our supply chain related to conflict minerals, we reviewed and assessed all CMRTs submitted to us. We used Assent's software to collect and manage the information from our supply chain. The primary risk we identified with respect to the data we collected from our supply chain for reporting year 2017 related to the nature of the responses we received. A large number of the responses we received were company-level CMRTs or did not specify the smelters or refiners used for the 3TGs in the components supplied to us. For those who did provide smelter or refiner information, this data was assessed for risk level and suppliers were made aware of any risk that their CMRT submission may include.

Additionally, suppliers are evaluated on program strength (further assisting in identifying risk in the supply chain). Evaluating and tracking the strength of the program meets the OECD Guidance and can assist in making key risk mitigation decisions as the program progresses. The criteria used to evaluate the strength of the program are:

- A. Have you established a conflict minerals sourcing policy?
- E. Have you implemented due diligence measures for conflict-free sourcing?
- G. Do you review due diligence information received from your suppliers against your company's expectations?
- H. Does your review process include corrective action management?

When suppliers meet or exceed those criteria (Yes to at least A, E, G and H), they are deemed to have a strong program. When suppliers do not meet those criteria, they are deemed to have a weak program. As of May 4<sup>th</sup>, 2018, 30 suppliers were identified as having a weak program.

### *Step 3: Designing and Implementing a Response to Identified Risks*

The Company deals with each supplier on an individual basis as our response to suppliers is dependent on the risk(s) identified and exposure. Factors considered include the overall willingness of the supplier to mitigate risk as well as our ability to procure alternative suppliers. Our response is measured and does include termination of our relationship, if necessary.

### *Step 4: Independent Third-Party Audits of Smelter's and Refiner's Due Diligence Practices.*

We do not have a direct relationship with any 3TG smelters or refiners and do not perform or direct audits of these entities within our supply chain.

### *Step 5: Publicly Report Our Supply Chain Due Diligence*

We have published our Form SD for the year ended December 31, 2017 and this Report on our website, <http://ir.amsc.com/governance.cfm>. Information found on or accessed through our website is not considered part of this Report and is not incorporated by reference herein.

## Due Diligence Results

### *Survey Results*

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As of May 4, 2018, our overall response rate was 76% for this reporting year. Five suppliers were unable to correct their CMRT and as such, are still listed as invalid submissions. Of the 113 originally surveyed suppliers for our combined product mix, 17 have reported that the 3TG used in the products that we purchase from them were not sourced from a Covered Country. 29 suppliers indicate that the products they provide to us contain 3TGs, of which based on due diligence we have not been able to determine whether such 3TGs may have been sourced from the Covered Countries.

From the responses that we received, we identified 5 smelters that potentially posed a risk. These concerns stem from (i) proximity to the DRC and Covered Countries, (ii) Responsible Minerals Assurance Process RMAP audit status, (iii) known or plausible evidence of unethical or conflict sourcing. For suppliers that identified these specific smelters of concern on their CMRT, we created a due diligence plan. These suppliers were contacted by Assent on behalf of AMSC to mitigate these risks in the supply chain. The suppliers were asked to provide a revised company level, product specific or, user-defined CMRT that does not contain the 5 red flagged smelters identified in their CMRTs submitted to AMSC initially. The suppliers were also asked to conduct additional due diligence to confirm the presence of gold or the presence of any of these flagged facilities in the chain of custody for the part or parts supplied to AMSC.

### *Smelters and Refiners*

Assent compared the list of smelters and refiners provided in our suppliers' responses to the lists of smelters maintained by the Responsible Minerals Initiative ("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 3TG. Our suppliers identified a total of 315 legitimate smelters and refiners that appear on the lists maintained by RMI. Based on the smelter list provided by suppliers via the CMRT and publicly available information, we have identified 256 smelters and refiners that are deemed RMAP Compliant – this indicates these smelters or refiners are compliant with the RMAP assessment protocols. A further 8X smelters or refiners 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 actually processed the 3TG contained in our products. All smelters and refiners identified by our suppliers that we believe may source 3TG from the Covered Countries appear on RMI's list of validated conflict free smelters and refiners.

Attached, as Appendix A is a list of all of the smelters and refiners listed by our suppliers in their completed CMRTs that appear on the lists of smelters maintained by the RMI as legitimate. Since most 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 actually 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 actually processed the 3TG contained in our products.

### *Risk Mitigation*

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AMSC has taken significant steps to improve the due diligence process and is committed to continuous process improvement and taking additional steps to mitigate the risk that its necessary conflict minerals benefit armed groups. These steps include implementing a:

- Continuous internal oversight and review process of responses;
- Continuous risk based evaluation of bills of material to confirm suspect materials;
- Risk based selection of suppliers providing suspect materials for current products;
- Process for requesting declarations and after a reasonable period with no response, second requests;
- Detailed inspection of responses and following up on inconsistencies, missing information, or possible inaccuracies of information; and
- For suppliers not responding to second requests, phone call follow-up and escalation to the VP, Operations, is mandatory.

Non-responding suppliers face discontinuation of their supply service to AMSC. The Company will keep improving its due diligence measures by working more closely with suppliers to help them understand and satisfy AMSC’s requirements fully.

#### Appendix A: List of Smelters and Refiners

This list includes all of the smelters and refiners listed by our suppliers in their completed CMRTs that appear on the lists of smelters maintained by the RMI. Since most 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 below actually processed the 3TGs contained in our products. Therefore, our list of processing smelters and refiners disclosed here may contain more facilities than those that actually processed the conflict minerals contained in our products. The efforts described above under “Due Diligence Performed” represent our efforts to determine the location of origin of our conflict minerals.

| <b>Metal</b> | <b>Standard Smelter Name</b>                    | <b>Smelter Facility Location</b> | <b>Smelter ID</b> |
|--------------|---|----------------------------------|-------------------|
| Gold         | Abington Reldan Metals, LLC                     | UNITED STATES                    | CID002708         |
| Gold         | Advanced Chemical Company                       | UNITED STATES                    | CID000015         |
| Gold         | Aida Chemical Industries Co., Ltd.              | JAPAN                            | CID000019         |
| Gold         | Al Etihad Gold LLC                              | 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 Córrego do Sítio Mineração    | 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                    | 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 | Caridad   | MEXICO               | CID000180 |
| Gold | CCR Refinery - Glencore Canada Corporation                      | CANADA               | CID000185 |
| Gold | Cendres + Métaux S.A.   | SWITZERLAND          | CID000189 |
| Gold | Chimet S.p.A.   | ITALY                | CID000233 |
| Gold | Chugai Mining   | JAPAN                | CID000264 |
| Gold | Daejin Indus Co., Ltd.  | KOREA, REPUBLIC OF   | CID000328 |
| Gold | Daye Non-Ferrous Metals Mining Ltd.                             | CHINA                | CID000343 |
| Gold | Degussa Sonne / Mond Goldhandel GmbH                            | GERMANY              | CID002867 |
| Gold | DODUCO Contacts and Refining GmbH                               | GERMANY              | CID000362 |
| Gold | Dowa  | JAPAN                | CID000401 |
| Gold | DSC (Do Sung Corporation)                                       | KOREA, REPUBLIC OF   | CID000359 |
| Gold | Eco-System Recycling Co., Ltd.                                  | JAPAN                | CID000425 |
| Gold | Elemetal Refining, LLC  | UNITED STATES        | CID001322 |
| Gold | Emirates Gold DMCC  | UNITED ARAB EMIRATES | CID002561 |
| Gold | Fidelity Printers and Refiners Ltd.                             | ZIMBABWE             | CID002515 |
| Gold | GCC Gujrat Gold Centre Pvt. Ltd.                                | INDIA                | CID002852 |
| Gold | Geib Refining Corporation                                       | UNITED STATES        | CID002459 |
| 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 | HeeSung   | KOREA, REPUBLIC OF   | CID000689 |
| 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 | Hwasung CJ Co., Ltd.  | KOREA, REPUBLIC OF   | CID000778 |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | CHINA                | CID000801 |
| Gold | Ishifuku Metal Industry Co., Ltd.                               | JAPAN                | CID000807 |
| Gold | Istanbul Gold Refinery  | TURKEY               | CID000814 |
| Gold | Italpreziosi  | ITALY                | CID002765 |

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|------|---|----------------------|-----------|
| 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        | 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 | Kyrgyzaltyn JSC                                     | KYRGYZSTAN           | CID001029 |
| Gold | Kyshtym Copper-Electrolytic Plant ZAO               | RUSSIAN FEDERATION   | CID002865 |
| Gold | L'azurde Company For Jewelry                        | SAUDI ARABIA         | CID001032 |
| 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 | Luoyang Zijin Yinhuai Gold Refinery Co., Ltd.       | CHINA                | CID001093 |
| Gold | Marsam Metals                                       | BRAZIL               | CID002606 |
| Gold | Materion  | UNITED STATES        | 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        | CID001157 |
| Gold | Metalúrgica Met-Mex Peñoles 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 | Morris and Watson Gold Coast                        | AUSTRALIA            | CID002866 |
| Gold | Moscow Special Alloys Processing Plant              | RUSSIAN FEDERATION   | CID001204 |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.Ş.              | TURKEY               | CID001220 |
| Gold | Navoi Mining and Metallurgical Combinat             | UZBEKISTAN           | CID001236 |
| Gold | Nihon Material Co., Ltd.                            | JAPAN                | CID001259 |

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|------|---|--------------------|-----------|
| Gold | Ögussa Österreichische 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      | 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 Précinox S.A.  | SWITZERLAND        | CID001498 |
| Gold | Rand Refinery (Pty) Ltd.  | SOUTH AFRICA       | CID001512 |
| Gold | Refinery of Seemine Gold Co., Ltd.  | CHINA              | CID000522 |
| Gold | Remondis Argentia B.V.  | NETHERLANDS        | CID002582 |
| Gold | Republic Metals Corporation   | UNITED STATES      | CID002510 |
| Gold | Royal Canadian Mint   | CANADA             | CID001534 |
| Gold | SAAMP   | FRANCE             | CID002761 |
| Gold | Sabin Metal Corp.   | UNITED STATES      | 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 |
| Gold | SAXONIA Edelmetalle GmbH  | GERMANY            | CID002777 |
| Gold | Schone Edelmetaal B.V.  | NETHERLANDS        | CID001573 |
| Gold | SEMPSA Joyeria Plateria S.A.  | SPAIN              | CID001585 |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd.                     | CHINA              | CID001619 |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.                           | CHINA              | CID001622 |
| Gold | Sichuan Tianze Precious Metals Co., Ltd.                                    | CHINA              | CID001736 |
| Gold | Singway Technology Co., Ltd.  | TAIWAN             | CID002516 |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals                        | RUSSIAN FEDERATION | CID001756 |
| Gold | Solar Applied Materials Technology Corp.                                    | TAIWAN             | CID001761 |
| 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 HiTech  | KOREA, REPUBLIC OF | CID002918 |
| Gold | T.C.A S.p.A   | ITALY              | CID002580 |
| Gold | Tanaka Kikinzoku Kogyo K.K.   | JAPAN              | CID001875 |

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| 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-Altyin                                  | 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      | CID001993 |
| Gold     | Universal Precious Metals Refining Zambia           | ZAMBIA             | CID002854 |
| Gold     | Valcambi S.A.                                       | SWITZERLAND        | CID002003 |
| Gold     | Western Australian Mint trading as The Perth Mint   | AUSTRALIA          | CID002030 |
| Gold     | WIELAND Edelmetalle GmbH                            | GERMANY            | CID002778 |
| Gold     | Yamamoto Precious Metal 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 | D Block Metals, LLC                                 | UNITED STATES      | CID002504 |
| Tantalum | Duoluoshan  | CHINA              | CID000410 |
| Tantalum | Exotech Inc.  | UNITED STATES      | 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      | CID002557 |
| Tantalum | Guangdong Rising Rare Metals-EO Materials Ltd.      | CHINA              | CID000291 |
| 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      | CID002548 |
| Tantalum | H.C. Starck Ltd.                                    | JAPAN              | CID002549 |
| 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 |

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| 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 | KEMET Blue Powder                                 | UNITED STATES      | CID002568 |
| Tantalum | King-Tan Tantalum Industry Ltd.                   | CHINA              | CID000973 |
| 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 | Power Resources Ltd.                              | MACEDONIA          | CID002847 |
| Tantalum | QuantumClean                                      | UNITED STATES      | CID001508 |
| Tantalum | Resind Industria e Comercio Ltda.                 | BRAZIL             | CID002707 |
| Tantalum | RFH Tantalum Smeltry Co., Ltd.                    | CHINA              | CID001522 |
| Tantalum | Solikamsk Magnesium Works OAO                     | RUSSIAN FEDERATION | CID001769 |
| Tantalum | Taki Chemicals                                    | JAPAN              | CID001869 |
| Tantalum | Telex Metals                                      | UNITED STATES      | CID001891 |
| Tantalum | Ulba Metallurgical Plant JSC                      | KAZAKHSTAN         | CID001969 |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd.     | CHINA              | CID002508 |
| Tantalum | Yichun Jin Yang Rare Metal Co., Ltd.              | CHINA              | CID002307 |
| Tin      | Alpha   | UNITED STATES      | CID000292 |
| Tin      | An Vinh Joint Stock Mineral Processing Company    | VIET NAM           | CID002703 |
| Tin      | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | CHINA              | CID000228 |
| Tin      | China Tin Group Co., Ltd.                         | CHINA              | CID001070 |
| Tin      | CNMC (Guangxi) PGMA Co., Ltd.                     | CHINA              | CID000278 |
| Tin      | CV Ayi Jaya                                       | INDONESIA          | CID002570 |
| Tin      | CV Dua Sekawan                                    | INDONESIA          | CID002592 |
| Tin      | CV Gita Pesona                                    | INDONESIA          | CID000306 |
| Tin      | CV Tiga Sekawan                                   | INDONESIA          | CID002593 |
| Tin      | CV United Smelting                                | INDONESIA          | CID000315 |
| Tin      | CV Venus Inti Perkasa                             | INDONESIA          | CID002455 |
| Tin      | Dowa  | JAPAN              | CID000402 |

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| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | VIET NAM      | CID002572 |
| Tin | EM Vinto  | BOLIVIA       | CID000438 |
| Tin | Estanho de Rondônia S.A.  | BRAZIL        | CID000448 |
| Tin | Fenix Metals  | POLAND        | CID000468 |
| Tin | Gejiu Fengming Metallurgy Chemical Plant  | CHINA         | CID002848 |
| Tin | Gejiu Jinye Mineral Company   | CHINA         | CID002859 |
| 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 Limited Company                                     | 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 Ketai Advanced Material Co., Ltd.   | CHINA         | CID000244 |
| Tin | Jiangxi New Nanshan Technology Ltd.   | CHINA         | CID001231 |
| Tin | Magnu's Minerais Metais e Ligas Ltda.   | BRAZIL        | CID002468 |
| Tin | Malaysia Smelting Corporation (MSC)   | MALAYSIA      | CID001105 |
| Tin | Melt Metais e Ligas S.A.  | BRAZIL        | CID002500 |
| Tin | Metallic Resources, Inc.  | UNITED STATES | 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 Metalurgical S.A.   | BOLIVIA       | CID001337 |
| Tin | PT Aries Kencana Sejahtera  | INDONESIA     | CID000309 |
| Tin | PT Artha Cipta Langgeng   | INDONESIA     | CID001399 |
| Tin | PT ATD Makmur Mandiri Jaya  | INDONESIA     | CID002503 |
| Tin | PT Babel Inti Perkasa   | INDONESIA     | CID001402 |
| Tin | PT Bangka Prima Tin   | INDONESIA     | CID002776 |
| Tin | PT Bangka Serumpun  | INDONESIA     | CID003205 |
| Tin | PT Bangka Tin Industry  | INDONESIA     | CID001419 |

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| Tin      | PT Belitung Industri Sejahtera                     | INDONESIA | CID001421 |
| Tin      | PT Bukit Timah                                     | INDONESIA | CID001428 |
| Tin      | PT DS Jaya Abadi                                   | INDONESIA | CID001434 |
| Tin      | PT Eunindo Usaha Mandiri                           | INDONESIA | CID001438 |
| Tin      | PT Inti Stania Prima                               | INDONESIA | CID002530 |
| Tin      | PT Karimun Mining                                  | INDONESIA | CID001448 |
| Tin      | PT Kijang Jaya Mandiri                             | INDONESIA | CID002829 |
| Tin      | PT Lautan Harmonis Sejahtera                       | INDONESIA | CID002870 |
| Tin      | PT Menara Cipta Mulia                              | INDONESIA | CID002835 |
| Tin      | PT Mitra Stania Prima                              | INDONESIA | CID001453 |
| Tin      | PT O.M. Indonesia                                  | INDONESIA | CID002757 |
| Tin      | PT Panca Mega Persada                              | INDONESIA | CID001457 |
| Tin      | PT Premium Tin Indonesia                           | INDONESIA | CID000313 |
| Tin      | PT Prima Timah Utama                               | INDONESIA | CID001458 |
| Tin      | PT Refined Bangka Tin                              | INDONESIA | CID001460 |
| Tin      | PT Sariwiguna Binasentosa                          | INDONESIA | CID001463 |
| Tin      | PT Stanindo Inti Perkasa                           | INDONESIA | CID001468 |
| Tin      | PT Sukses Inti Makmur                              | INDONESIA | CID002816 |
| Tin      | PT Sumber Jaya Indah                               | INDONESIA | CID001471 |
| Tin      | PT Timah (Persero) Tbk Kunder                      | INDONESIA | CID001477 |
| Tin      | PT Timah (Persero) Tbk Mentok                      | INDONESIA | CID001482 |
| Tin      | PT Tinindo Inter Nusa                              | INDONESIA | CID001490 |
| Tin      | PT Tommy Utama                                     | INDONESIA | CID001493 |
| Tin      | Resind Industria e Comercio Ltda.                  | BRAZIL    | CID002706 |
| Tin      | Rui Da Hung  | TAIWAN    | CID001539 |
| Tin      | Soft Metais Ltda.                                  | BRAZIL    | CID001758 |
| Tin      | Super Ligas  | Brazil    | CID002756 |
| Tin      | Thaisarco  | THAILAND  | CID001898 |
| Tin      | Tuyen Quang Non-Ferrous Metals Joint Stock Company | VIET NAM  | CID002574 |
| Tin      | White Solder Metalurgia e Mineração Ltda.          | BRAZIL    | CID002036 |
| Tin      | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.      | CHINA     | CID002158 |
| Tin      | Yunnan Tin Company Limited                         | CHINA     | CID002180 |
| Tungsten | A.L.M.T. TUNGSTEN Corp.                            | JAPAN     | CID000004 |
| Tungsten | ACL Metais Eireli                                  | BRAZIL    | CID002833 |
| Tungsten | Asia Tungsten Products Vietnam Ltd.                | VIET NAM  | CID002502 |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd.       | CHINA     | CID002513 |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd.               | CHINA     | CID000258 |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd.                   | CHINA     | CID000499 |
| Tungsten | Ganzhou Haichuang Tungsten Co., Ltd.               | CHINA     | CID002645 |

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| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd.                   | CHINA              | CID000875 |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd.                       | CHINA              | CID002315 |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd.                            | CHINA              | CID002494 |
| Tungsten | Ganzhou Yatai Tungsten Co., Ltd.                              | CHINA              | CID002536 |
| Tungsten | Global Tungsten & Powders Corp.                               | UNITED STATES      | 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 Dayu Longxintai Tungsten Co., Ltd.                    | CHINA              | CID002647 |
| 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 Xinsheng Tungsten Industry Co., Ltd.                  | CHINA              | CID002317 |
| Tungsten | Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd.          | CHINA              | CID002535 |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd.                           | CHINA              | CID002316 |
| Tungsten | Kennametal Fallon   | UNITED STATES      | CID000966 |
| Tungsten | Kennametal Huntsville   | UNITED STATES      | CID000105 |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd.                               | CHINA              | CID002319 |
| Tungsten | Moliren Ltd   | RUSSIAN FEDERATION | CID002845 |
| Tungsten | Niagara Refining LLC  | UNITED STATES      | CID002589 |
| Tungsten | Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC     | VIET NAM           | CID002543 |
| Tungsten | Philippine Chuangxin Industrial Co., Inc.                     | PHILIPPINES        | CID002827 |
| Tungsten | South-East Nonferrous Metal Company Limited of Hengyang City  | CHINA              | CID002815 |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd.                           | VIET NAM           | CID001889 |
| Tungsten | Unecha Refractory metals plant                                | RUSSIAN FEDERATION | CID002724 |
| Tungsten | Vietnam Youngsun Tungsten Industry Co., Ltd.                  | VIET NAM           | CID002011 |

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| Tungsten | Wolfram Bergbau und Hütten 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 |

## Appendix B – Countries of Origin

This list of potential countries of origin is populated based on publicly available information, our RCOI and due diligence. It is important to note that this is also based on company level responses and therefore, it is not certain which of these countries of origin can be linked to our products.

Argentina, Australia, Austria, Benin, Bolivia (Plurinational State of), Brazil, Burkina Faso, Burundi, Cambodia, Canada, Chile, China, Colombia, Congo, Democratic Republic of the, Ecuador, Eritrea, Ethiopia, France, Germany, Ghana, Guatemala, Guinea, Guyana, Honduras, India, Indonesia, Japan, Kazakhstan, Laos, Madagascar, Malaysia, Mali, Mexico, Mongolia, Mozambique, Myanmar, Namibia, Nicaragua, Nigeria, Panama, Peru, Portugal, Russian Federation, Rwanda, Senegal, Sierra Leone, South Africa, Spain, Thailand, Togo, Uganda, United Kingdom of Great Britain and Northern Ireland, United States of America, Uzbekistan, Viet Nam, Zimbabwe