

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

FORM SD  
Specialized Disclosure Report

---

# China Mobile Limited

---

(Exact name of registrant as specified in its charter)

|   |                             |                                      |
|---|-----------------------------|--------------------------------------|
| Hong Kong, China  | 1-14696                     | Not Applicable                       |
| (State or other jurisdiction<br>of incorporation or organization) | (Commission<br>File Number) | (IRS Employer<br>Identification No.) |

|   |               |
|---|---------------|
| 60th Floor, The Center<br>99 Queen's Road Central<br>Hong Kong, China | N/A           |
| (Address of principal executive offices)                              | (Postal Code) |

|  |
|--|
| Grace Wong<br>Company Secretary<br>Telephone: (852) 3121-8888  |
| (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:

X  Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2018.

## **Section 1 – Conflict Minerals Disclosure**

### **Item 1.01 Conflict Minerals Disclosure and Report**

#### **Conflict Minerals Disclosure**

China Mobile Limited (“China Mobile”) is filing a Conflict Minerals Report, attached as Exhibit 1.01 to this Form SD. China Mobile has also posted the Conflict Minerals Report to its corporate website at <http://www.chinamobileltd.com/en/ir/sec.php>. The content of such website is not a part of this Form SD. The reasonable country of origin inquiry and related due diligence procedures employed by China Mobile, and the results thereof, are described in the Conflict Minerals Report, which report is incorporated into this Item 1.01 by reference.

#### **Item 1.02 Exhibit**

China Mobile has filed, as an exhibit to this Form SD, the Conflict Minerals Report required by Item 1.01.

## **Section 2 – Exhibits**

### **Item 2.01 Exhibits**

The following exhibit is filed as part of this Form:

**EXHIBIT 1.01 – CONFLICT MINERALS REPORT**, as required by Items 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 undersigned thereunto duly authorized.

CHINA MOBILE LIMITED  
(Registrant)

By: /s/ LI Yue  
LI Yue  
Executive Director & Chief Executive Officer

Date: May 29, 2019

**EXHIBIT 1.01 – CONFLICT MINERALS REPORT**

**China Mobile Limited**

**Conflict Minerals Report**

**For The Year Ended December 31, 2018**

This Conflict Minerals Report for China Mobile Limited (together with its consolidated subsidiaries, “China Mobile,” “we,” or “our”) is provided in accordance with Rule 13p-1 under the Securities Exchange Act of 1934, as amended (“Rule 13p-1”), for the reporting period from January 1 to December 31, 2018 (the “Reporting Period”).

**I. Background**

**A. Identification of Products Containing Conflict Minerals**

Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and the rules promulgated by the United States Securities and Exchange Commission (“SEC”) thereunder (collectively, the “Conflict Minerals Rule”) impose disclosure and due diligence requirements on SEC-reporting issuers that manufacture or contract to manufacture products that contain “conflict minerals” that are necessary to the functionality or production of those products. Conflict minerals are defined under the Conflict Minerals Rule to include tin, tantalum, tungsten and gold.

China Mobile is a telecommunications services provider, operating mainly in the People’s Republic of China. In its ordinary course of business, China Mobile and its subsidiaries engage in the sale of certain telecommunications equipment and terminals (“Products”). No Products are manufactured by China Mobile, but some Products are contracted by China Mobile Group Device Company Limited (“China Mobile Device”), MIGU Co., Ltd. (“MIGU”), China Mobile IoT Company Limited (“China Mobile IoT”), Government and Enterprise Service Company (“G&E”), China Mobile (Hangzhou) Information Technology Company Limited (“Hangzhou R&D”) and China Mobile (Suzhou) Software Technology Co., Ltd. (“Suzhou R&D”), all of which are our wholly-owned subsidiaries, together, “Device Subsidiaries,” to be manufactured by third parties. See “Product Description.” China Mobile has determined that “conflict minerals” (also referred to herein as “3TG”) are necessary to the functionality or production of certain Products contracted by China Mobile to be manufactured by third parties on or after January 1, 2018.

**B. Reasonable Country of Origin Inquiry**

China Mobile has conducted an inquiry that was designed to determine whether any of the 3TG in Products originated in the Democratic Republic of the Congo (the “DRC”) or an adjoining country as defined in the instructions to Form SD (collectively together with the DRC, the “Covered Countries”) or is from recycled or scrap sources. If, based on such inquiry, China Mobile knows or has reason to believe that any of the necessary conflict minerals contained in Products originated or may have originated in a Covered Country, and knows or has reason to believe that those necessary conflict minerals may not be solely from recycled or scrap sources, China Mobile will conduct due diligence to determine if the necessary conflict minerals contained in those Products did or did not directly or indirectly finance or benefit armed groups in the Covered Countries. Products which do not contain necessary conflict minerals that directly or indirectly finance or benefit armed groups in the Covered Countries are considered “DRC conflict free” by China Mobile after conducting its due diligence inquiry. As China Mobile is a downstream supplier of finished products and does not purchase from, and has no established commercial relationships with, smelters or refiners of conflict minerals, China Mobile’s reasonable country of origin inquiry (“RCOI”) focused on its direct suppliers. China Mobile was able to identify all of its direct suppliers of Products containing 3TG that have been contracted out by China Mobile to third party manufacturers. There were 132 direct suppliers identified in such inquiry during the Reporting Period.

For the RCOI survey, China Mobile adopted the Conflict Minerals Reporting Template (the “Conflict Minerals Reporting Template”) published by the Conflict-Free Sourcing Initiative (“CFSI”). China Mobile sent the template to the 132 identified direct suppliers and received responses from 123 of them. China Mobile further checked the names of the smelters and refiners identified in such responses against the CFSI Smelter Reference List and the list of smelters that have received a “conflict free” designation from the Conflict Free Smelter Program (“CFSP”) of CFSI (“CFSP-compliant Smelter List”) to determine whether any of the conflict minerals might originate in a Covered Country. The result of the RCOI survey did not reveal any conflict minerals that are used in Products and originated in a Covered Country and that are not from recycled or scrap sources. However, there was a risk that conflict minerals used in Products may have originated in a Covered Country and may not be from recycled or scrap sources. Therefore, as required by Item 1.01(c) of Form SD, we conducted due diligence on the source and chain of custody of the conflict minerals contained in Products supplied to us by our direct suppliers for the Reporting Period.

## **II. Due Diligence**

### **A. Design of Due Diligence**

China Mobile has undertaken due diligence measures to investigate the source and chain of custody of the 3TG in Products. China Mobile’s conflict minerals due diligence measures are being designed in conformance with the Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition (2016) (the “OECD Guidance”), an internationally recognized due diligence framework, as applicable for tin, tantalum, tungsten, gold and “downstream companies,” as such term is defined in the OECD Guidance.

The OECD Guidance sets forth the following five steps for establishing a responsible supply chain: (i) establishing strong company management systems, (ii) identifying and assessing risks in the supply chain, (iii) designing and implementing a strategy to respond to identified risks, (iv) carrying out independent third party audit of supply chain due diligence at identified points in the supply chain, and (v) reporting annually on supply chain due diligence.

### **B. Due Diligence Measures**

- (i) Establish strong company management systems:
  - a. China Mobile published the Policy for a Responsible Supply Chain of Conflict Minerals and Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas in 2016, aiming at responsible procurement. The policy sets forth China Mobile’s goal to procure and use materials free from conflict minerals originated from Covered Countries and to achieve such goal by conducting source-tracing supply chain inquiries and strengthening cooperation with suppliers. The guidelines lay out certain detailed steps and specific measures China Mobile is required to undertake to carry out conflict minerals due diligence.
  - b. Since February 2016, the discipline, inspection and audit department of China Mobile Device has become a member of the conflict minerals working group and led the relevant due diligence work in order to streamline the conflict minerals due diligence procedures. In addition, since February 2016, conflict minerals research briefings have become part of the regular agenda at the general managers’ meeting and the reports of briefings are submitted regularly for the review and approval by the management of China Mobile Device. Since March 2017 China Mobile also established a dedicated team of personnel for handling this conflict minerals matter. This team comprises of personnel from China Mobile’s Legal and Regulatory Department, procurement division and the Device Subsidiaries. As the lead department in charge of compliance management, the Legal and Regulatory Department formulated a five-year compliance program in 2016 and required the relevant subsidiaries to initiate the process of establishing its conflict minerals compliance mechanism in accordance with the Conflict Minerals Rule as soon as practicable.

- c. China Mobile gathers information using the CFSI Conflict Minerals Reporting Template sent to its direct suppliers to determine the chain of custody of 3TG contained in Products.
  - d. The Device Subsidiaries communicated and will continue to communicate to their suppliers that China Mobile based on its policy does not purchase nor support use of conflict minerals originated in Covered Countries, and required its suppliers not to purchase conflict minerals originated in Covered Countries and to commit to extending such requirements to their suppliers. Moreover, China Mobile Device and Hangzhou R&D have incorporated a term on conflict minerals into their supplier contracts whereby the suppliers represent to China Mobile that their products and packaging do not contain any conflict minerals originated in any Covered Country. In November 2018, G&E issued its standard supplier contract with such terms expressly incorporated. China Mobile IoT intends to incorporate such term to their supplier contracts in a step-by-step manner. MIGU has added such term in the technical specifications in the annex of some of their supplier contracts. Suzhou R&D communicates with its suppliers about our ROCI and requires them to incorporate a term into their contracts or sign a commitment not to purchase conflict minerals originated in Covered Countries.
  - e. China Mobile communicated with and educated relevant personnel from China Mobile group companies and suppliers regarding the SEC conflict minerals disclosure requirements and China Mobile's conflict minerals policy. China Mobile also communicated its guidelines for conflict minerals due diligence procedures to China Mobile group companies.
- (ii) Identify and assess risks in the supply chain:
- a. China Mobile Device is an entity engaging in the procurement and distribution of mobile telephones, tablets and other devices. China Mobile IoT is an entity that operates IoT network and OneNET, an IoT open platform, designs and develops IoT modules and chips, develops IoT solutions and featured IoT products such as Internet of vehicle, smart home devices and smart wearables. Hangzhou R&D is an entity that engages in developing network equipment as well as providing information technology support for mobile terminals, software and related services. Suzhou R&D is an entity engaging in business development, software sales, system integration and others in the fields of cloud computing, big data and IT support. G&E mainly engages in the sales of information technology products to, and providing end-to-end services for, corporate customers such as governmental agencies and large enterprises, and nationwide corporate product integration and promotion. MIGU is established for the provision, operation and service integration of digital content products, which includes music, video, reading, games and animation businesses. China Mobile has requested the direct suppliers from which the Device Subsidiaries procured any Product containing 3TG that have been contracted by China Mobile to be manufactured by third parties to respond to the supply chain survey.
  - b. China Mobile adopted the Conflict Minerals Reporting Template published by CFSI for purposes of the supply chain survey. China Mobile followed up with direct suppliers to obtain complete responses to the supply chain survey, verified the collected responses, and inquired about any discrepancies in the response provided. The status of the supply chain survey and due diligence has been reported to China Mobile's Legal and Regulatory Department, which is considering actions to mitigate the supply chain risks identified, such as those described in “– Risk Mitigation Steps China Mobile Takes”. In assessing the risk in its supply chain, China Mobile concluded that because suppliers of certain Products containing 3TG may have provided incomplete information regarding metal origins and conflict-free sourcing to China Mobile and the reliability of the information provided has yet to be verified, there could be risks that certain 3TG used in the manufacturing might have originated in the Covered Countries and may not have originated from recycled or scrap sources.

- (iii) Design and implement a strategy to respond to identified risks:
  - a. In accordance with China Mobile’s guidelines for conflict minerals due diligence procedures, findings of the supply chain risk assessment are reported annually to the designated senior management and the Audit Committee of China Mobile.
  - b. To evaluate and respond to identified risks, China Mobile relies on the suppliers’ responses to the Conflict Minerals Reporting Template, CFSI Smelter Reference List and the CFSP-compliant Smelter List. Since 2015, China Mobile has compared the names of the smelters and refiners identified in such responses against the CFSI Smelter Reference List and the CFSP-compliant Smelter List to identify the smelters and refiners that had not received a “conflict free” designation from CFSP and followed up with the suppliers to obtain further information on the identified smelters and refiners.
  - c. Pursuant to its Policy for a Responsible Supply chain of Conflict Minerals and its guidelines for conflict minerals due diligence procedures, China Mobile shall temporarily suspend trade in order to achieve measurable risk mitigation, or terminate its relationship with a supplier after risk mitigation attempts fail or where risk mitigation is not feasible, and terminate as soon as commercially practicable a procurement plan if China Mobile becomes aware of any procured material containing conflict minerals originated from Covered Countries. As of the filing date of this report, we have not identified any such suppliers.
- (iv) Carry out independent third party audit of supply chain due diligence at identified points in the supply chain:
  - a. As a downstream supplier of finished products, China Mobile has no direct commercial relationships with smelters. In addition, for production completed during the Reporting Period, China Mobile did not receive sufficient information from its direct suppliers regarding the identity of smelters from which the minerals were derived.
  - b. China Mobile’s due diligence efforts rely on cross-industry initiatives, such as the CFSI, to conduct audits of the due diligence practices of the smelters and refiners.
- (v) Report annually on supply chain due diligence:
  - a. China Mobile is reporting annually on its supply chain due diligence by preparing this Conflict Minerals Report to disclose the description of the measures taken to determine the source and chain of custody of any of the necessary conflict minerals contained in China Mobile’s products, as well as the results of China Mobile’s due diligence. This Conflict Minerals Report is available on China Mobile’s corporate website (<http://www.chinamobileltd.com/en/ir/sec.php>). The information contained in such website is not a part of this Form SD.

### **C. Risk Mitigation Steps China Mobile Takes**

The due diligence process discussed above is an ongoing process. At this time, China Mobile takes the following actions to improve the due diligence conducted to further mitigate any risk that conflict minerals in Products necessary to the functionality or production of Products could benefit or finance armed groups in the Covered Countries.

- (i) China Mobile supports cross-industry initiatives to define and improve industry best practices and improve China Mobile’s influence and leverage over the supply chain in accordance with the OECD Guidance.

- (ii) China Mobile works with its direct suppliers and direct them to obtain responses from all lower tier suppliers subject to the RCOI survey, and to improve the content of the RCOI survey responses.
- (iii) China Mobile communicates its policy regarding conflict minerals to its suppliers and strives to incorporate such policy into future contract terms and specifications with its suppliers. China Mobile also explains the procedures of its RCOI survey in the supplier meetings and requests suppliers to cooperate with its effort to identify the source of the necessary conflict minerals.

### III. Product Description

Based on the due diligence efforts as described above in this report, China Mobile has determined the following Products to be “DRC conflict free” for the Reporting Period:

| <b>Product/Model</b>   | <b>Description</b>          |
|--|-----------------------------|
| CM101s / CM101s-2 / CM101s-3 /<br>CM101s-4 / CM201z / CM201-1 /<br>CM201-2 / GM219-S / GM220-S /<br>GM620-S / CM301 / M301A / M301H /<br>HM201 / HM301 | Set-Top Box                 |
| H1s-3 / GM219-S / GM619 / GM619-H /<br>GM219-S / GM220-S / GM620-S   | Smart Internet Gateway      |
| H10g-02  | Merging Internet Gateway    |
| TB2301   | Cast to TV                  |
| GS2101 / GS3101 / GM220-S / GM620  | GPON ONU                    |
| P21 / C12  | Video Conferencing Terminal |
| D13  | HD IP Video Phone           |
| V21  | Voice Conferencing Terminal |
| MGG2000  | Smart Scale                 |
| MG100 / MG101 / MG2000   | Internet Set-Top Box        |
| M5310 / M5310-A / M6311 / M6311-R /<br>M6312 / M6313 / M8312 / CM51 / CM02<br>/ M5330 / M6220 / NB-T03H / NB-T03Q<br>/ NB-T04H / NB-T04Q               | Module                      |
| DFN8L 3X3 SE-SIM   | Security Chip               |
| C60 / A21  | Smart Speaker               |
| SCM901   | Smart Mirror                |
| MS18-2 / Basic Version / Customized<br>Versions A/B/C/D  | Smart Door Lock             |

|  |                                |
|--|--------------------------------|
| C10 / C21 / C12 / C12e / C13 / C15         | IP Camera                      |
| NB-T02A                                    | Handheld Test Terminal         |
| DP1A / DP1B                                | Power Line Communication Modem |
| DWE1A                                      | Wi-Fi Amplifier                |
| AN1201                                     | Router                         |
| USIM Card 2*2                              | USIM                           |
| Mini Signal Indicator (Dual / Single Mode) | Mini Signal Booster            |
| SL10994A                                   | Car Positioning Terminal       |

The suppliers of the Products listed above have identified the smelters and refiners in the supply chain that are sources of the necessary conflict minerals for the Products listed above. All of these smelters and refiners have received a “conflict free” designation from CFSP, and as a result of this finding, China Mobile came to its reasonable determination that the Products listed above are DRC conflict free.

China Mobile is unable to determine the source of the conflict minerals used in the following Products:

| <b>Product/Model</b>  | <b>Description</b>              |
|---|---------------------------------|
| A4 / A4s / A5 / N3 / N5   | Mobile Phone                    |
| F1 / F1s / T1A  | Telephone                       |
| CM101h / CM102 / CM201-1 / CM201-2 / M101 / HM201 / M301H         | Set-Top Box                     |
| H1s-2 / H1NE / H10E / GM219-S / GM220-S / GM619 / GM620 / GM619-H | Smart Internet Gateway          |
| AN1207M / AN1206M / AN1208M                                       | Power Adapter Near End          |
| AN1207S / AN1206S / AN1208S                                       | Power Adapter Rear End          |
| AN1307 / AN1305   | In-Wall Access Point            |
| AN1308 / AN1306 / HN130   | Power over Ethernet Switch      |
| H10g-01 / S21g / H10g-INS I / H10g-INS II                         | Merging Internet Gateway        |
| A11 / A13 / C13c / E1   | IP Camera                       |
| C11 / C13 / C31 / H21   | Cloud Video Conference Terminal |
| P1 / CM02   | Smart Rear-View Mirror          |
| CMS1 / CMS2 / D02 / XCWS-D02-XD                                   | Driving Recorder                |
| MGA1000   | Earphone                        |
| E10 / P10   | Live Broadcasting Box           |
| C21 / D31   | Conferencing Terminal           |
| MGM2018 / Xiao Yan / SL1 / SL2                                    | Speaker                         |

| <b>Product/Model</b>  | <b>Description</b>                    |
|---|---------------------------------------|
| HN100 / HN120 / HN140 / HN330 / HN350 / HN400 / MW1 / ZY366 / ZY369 / ZY368 | Router                                |
| IMU-AL03 / IMU-AL06 / V1.0 (No. 10) /5330-A / M5330-STD / M5330-GNSS        | Module                                |
| AH-PLC001   | Power Line Adapter                    |
| F1A / F02A  | Femtocell                             |
| NH1A  | NB-IoT Smart Bracelet                 |
| W2A   | Monitoring Bracelet                   |
| NT1A  | NB-IoT Thermometer                    |
| NP1A  | PM2.5 Detector                        |
| SP-IOB-01 / SP-IOB-02 / FL1   | Smart Door Lock                       |
| CMIOT-YG-CD-B-01 / CMIOT-YG-CD-B-02 / NS1A                                  | Smoke Detector                        |
| CW1A  | Kids' Watch                           |
| W1A   | Sport Watch                           |
| DWE1A   | Wi-Fi Amplifier                       |
| AP02A   | Handheld Antenna Measuring Instrument |
| GS2101 / GS3101   | GPON ONU                              |
| C216B / CN18SX / CN18DX / C217X / C2167GX / C417M-D / C417M-DX              | Communication Chip                    |
| DFN8L eSIM  | eSIM                                  |
| DMU   | Vehicle Datalogic                     |
| Veneer X  | 4G Core Board                         |
| CMIOT-AF-BJ-Y-01  | One-Touch Alarming Terminal           |
| SE-LC-P-S01 / SE-LC-G-S01 / SE-LC-N-S01                                     | PLC / GPRS / NB-IoT Single Lamp       |
| SE-LC-P-D01/ SE-LC-G-D01/ SE-LC-N-D01                                       | PLC / GPRS / NB-IoT Dual Lamp         |
| HCX-IOV-NB2   | Car Positioning Terminal              |
| SmartDAS-RFID / SmartDAS-RFID/WLAN  | Inter-Frequency Combiner              |
| SmartDAS-01-BG / SmartDAS-01-ZQ / SmartDAS-02-ZQ / SmartDAS-GW-2G           | Smart Indoor Sub-Antenna              |
| AH-YXM01  | Smart Speaker Wi-Fi Board             |
| RE300   | Repeater/Hotspot                      |
| DST1A / DST2A   | Locator                               |
| ED1B  | ETC                                   |

China Mobile's efforts to determine the mine or location of origin with the greatest possible specificity are part of its due diligence, as described above in this report. Based on the information provided by suppliers, China Mobile believes that the facilities used to process the necessary conflict minerals in Products include the smelters and refiners listed in Annex I below.

Based on the due diligence efforts as described above in this report, China Mobile was not able to obtain sufficient information to conclusively determine the countries of origin of the necessary conflict minerals in its Products mentioned above or whether such necessary conflict minerals are from recycled or scrap sources. However, based on the information provided by suppliers, China Mobile believes that the countries of origin of the necessary conflict minerals contained in its products include those countries listed in Annex II below.

**Annex I**

| <b>METAL</b> | <b>SMELTER OR REFINER NAME</b>                                | <b>FACILITY LOCATION</b> | <b>CONFLICT-FREE STATUS<sup>1</sup></b> |
|--------------|---|--------------------------|---|
| Gold         | Advanced Chemical Company                                     | USA                      | Conflict-Free                           |
| Gold         | AGR (Perth Mint Australia)                                    | Australia                | Unknown                                 |
| Gold         | Aida Chemical Industries Co., Ltd.                            | Japan                    | Conflict-Free                           |
| Gold         | Al Etihad Gold Refinery DMCC                                  | United Arab Emirates     | Conflict-Free                           |
| Gold         | Allgemeine Gold-und Silberscheideanstalt A.G.                 | Germany                  | Conflict-Free                           |
| Gold         | Almalyk Mining and Metallurgical Complex (AMMC)               | Uzbekistan               | Conflict-Free                           |
| Gold         | AngloGold Ashanti Córrego do Sítio Mineracao                  | Brazil                   | Conflict-Free                           |
| Gold         | Argor-Heraeus S.A.  | Switzerland              | Conflict-Free                           |
| Gold         | Asahi Pretec Corp.  | Japan                    | Conflict-Free                           |
| Gold         | Asahi Refining USA Inc.                                       | USA                      | Conflict-Free                           |
| Gold         | Asaka Riken Co., Ltd.   | Japan                    | Conflict-Free                           |
| Gold         | Atasay Kuyumculuk Sanayi Ve Ticaret A.S.                      | Turkey                   | Unknown                                 |
| Gold         | AU Traders and Refiners                                       | South Africa             | Conflict-Free                           |
| Gold         | Aurubis AG  | Germany                  | Conflict-Free                           |
| Gold         | Bangalore Refinery  | India                    | Conflict-Free                           |
| Gold         | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | Philippines              | Conflict-Free                           |
| Gold         | Boliden AB  | Sweden                   | Conflict-Free                           |
| Gold         | Caridad   | Mexico                   | Unknown                                 |
| Gold         | C. Hafner GmbH + Co. KG                                       | Germany                  | Conflict-Free                           |
| Gold         | CCR Refinery - Glencore Canada Corporation                    | Canada                   | Conflict-Free                           |
| Gold         | Cendres + Metaux S.A.   | Switzerland              | Conflict-Free                           |
| Gold         | Chimet S.p.A.   | Italy                    | Conflict-Free                           |
| Gold         | Chugai Mining   | Japan                    | Unknown                                 |
| Gold         | Daejin Indus Co., Ltd.  | Korea, Republic Of       | Conflict-Free                           |
| Gold         | Daye Non-Ferrous Metals Mining Ltd.                           | China                    | Unknown                                 |
| Gold         | DSC (Do Sung Corporation)                                     | Korea, Republic Of       | Conflict-Free                           |
| Gold         | DODUCO Contacts and Refining GmbH                             | Germany                  | Conflict-Free                           |
| Gold         | Dowa  | Japan                    | Conflict-Free                           |

<sup>1</sup> This categorization is based on the CFSP standards. All CFSP-compliant smelters or refiners are listed here as conflict-free.

| <b>METAL</b> | <b>SMELTER OR REFINER NAME</b>                                  | <b>FACILITY LOCATION</b> | <b>CONFLICT-FREE STATUS<sup>1</sup></b> |
|--------------|---|--------------------------|---|
| Gold         | Eco-System Recycling Co., Ltd.                                  | Japan                    | Conflict-Free                           |
| Gold         | Elemetal Refining, LLC  | USA                      | Unknown                                 |
| Gold         | Emirates Gold DMCC  | United Arab Emirates     | Conflict-Free                           |
| Gold         | GCC Gujrat Gold Centre Pvt. Ltd.                                | India                    | Unknown                                 |
| Gold         | Geib Refining Corporation                                       | USA                      | Conflict-Free                           |
| Gold         | Gold Refinery of Zijin Mining Group Co., Ltd.                   | China                    | Conflict-Free                           |
| Gold         | Great Wall Precious Metals Co., Ltd. of CBPM                    | China                    | Unknown                                 |
| Gold         | Guangdong Gaoyao Co   | China                    | Unknown                                 |
| Gold         | Guangdong Jinding Gold Limited                                  | China                    | Unknown                                 |
| Gold         | Guoda Safina High-Tech Environmental Refinery Co., Ltd.         | China                    | Unknown                                 |
| Gold         | Hangzhou Fuchunjiang Smelting Co., Ltd.                         | China                    | Unknown                                 |
| Gold         | HeeSung Metal Ltd.  | Korea, Republic Of       | Conflict-Free                           |
| Gold         | Heimerle + Meule GmbH   | Germany                  | Conflict-Free                           |
| Gold         | Heraeus Ltd. Hong Kong  | China                    | Unknown                                 |
| Gold         | Heraeus Precious Metals GmbH & Co. KG                           | Germany                  | Conflict-Free                           |
| Gold         | Heraeus Metals Hong Kong Ltd.                                   | China                    | Conflict-Free                           |
| Gold         | Hunan Chenzhou Mining Co., Ltd.                                 | China                    | Unknown                                 |
| Gold         | Hwasung CJ Co., Ltd.  | Korea, Republic Of       | Unknown                                 |
| Gold         | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | China                    | Conflict-Free                           |
| Gold         | Ishifuku Metal Industry Co., Ltd.                               | Japan                    | Conflict-Free                           |
| Gold         | Istanbul Gold Refinery  | Turkey                   | Conflict-Free                           |
| Gold         | Italpreziosi  | Italy                    | Conflict-Free                           |
| Gold         | Japan Mint  | Japan                    | Conflict-Free                           |
| Gold         | Jiangxi Copper Co., Ltd.  | China                    | Conflict-Free                           |
| Gold         | Johnson Matthey Inc   | USA                      | Unknown                                 |
| Gold         | Johnson Matthey Canada  | Canada                   | Unknown                                 |
| Gold         | JSC Ekaterinburg Non-Ferrous Metal Processing Plant             | Russia                   | Unknown                                 |
| Gold         | JSC Uralelectromed  | Russia                   | Conflict-Free                           |
| Gold         | JX Nippon Mining & Metals Co., Ltd.                             | Japan                    | Conflict-Free                           |
| Gold         | Kazakhmys Smelting LLC  | Kazakhstan               | Unknown                                 |
| Gold         | Kazzinc   | Kazakhstan               | Conflict-Free                           |

| <b>METAL</b> | <b>SMELTER OR REFINER NAME</b>                              | <b>FACILITY LOCATION</b> | <b>CONFLICT-FREE STATUS<sup>1</sup></b> |
|--------------|---|--------------------------|---|
| Gold         | Kennecott Utah Copper LLC                                   | USA                      | Conflict-Free                           |
| Gold         | KGHM Polska Miedz Spolka Akcyjna                            | Poland                   | Unknown                                 |
| Gold         | Kojima Chemicals Co., Ltd.                                  | Japan                    | Conflict-Free                           |
| Gold         | Korea Zinc Co., Ltd.  | Korea,<br>Republic Of    | Conflict-Free                           |
| Gold         | Kyrgyzaltyn JSC   | Kyrgyzstan               | Conflict-Free                           |
| Gold         | Kyshtym Copper-Electrolytic Plant ZAO                       | Russia                   | Unknown                                 |
| Gold         | L'azurde Company For Jewelry                                | Saudi Arabia             | Unknown                                 |
| Gold         | Lingbao Gold Co., Ltd.                                      | China                    | Unknown                                 |
| Gold         | Lingbao Jinyuan Tonghui Refinery Co., Ltd.                  | China                    | Unknown                                 |
| Gold         | L'Orfebvre S.A.   | Andorra                  | Conflict-Free                           |
| Gold         | LS-NIKKO Copper Inc.  | Korea,<br>Republic Of    | Conflict-Free                           |
| Gold         | Luoyang Zijin Yinhui Gold Refinery Co., Ltd.                | China                    | Unknown                                 |
| Gold         | Marsam Metals   | Brazil                   | Conflict-Free                           |
| Gold         | Materion  | USA                      | Conflict-Free                           |
| Gold         | Matsuda Sangyo Co., Ltd.                                    | Japan                    | Conflict-Free                           |
| Gold         | Metalor Technologies S.A.                                   | Switzerland              | Conflict-Free                           |
| Gold         | Metalor Technologies (Singapore) Pte., Ltd.                 | Singapore                | Conflict-Free                           |
| Gold         | Metalor Technologies (Suzhou) Ltd.                          | China                    | Conflict-Free                           |
| Gold         | Metalor USA Refining Corporation                            | USA                      | Conflict-Free                           |
| Gold         | Metalurgica Met-Mex Penoles S.A. De C.V.                    | Mexico                   | Conflict-Free                           |
| Gold         | Mitsubishi Materials Corporation                            | Japan                    | Conflict-Free                           |
| Gold         | Mitsui Mining and Smelting Co., Ltd.                        | Japan                    | Conflict-Free                           |
| Gold         | MMTC-PAMP India Pvt., Ltd.                                  | India                    | Conflict-Free                           |
| Gold         | Modeltech Sdn Bhd   | Malaysia                 | Unknown                                 |
| Gold         | Morris and Watson   | New Zealand              | Unknown                                 |
| Gold         | Moscow Special Alloys Processing Plant                      | Russia                   | Conflict-Free                           |
| Gold         | Nadir Metal Rafineri San. Ve Tic. A.S.                      | Turkey                   | Conflict-Free                           |
| Gold         | Navoi Mining and Metallurgical Combinat                     | Uzbekistan               | Unknown                                 |
| Gold         | Nihon Material Co., Ltd.                                    | Japan                    | Conflict-Free                           |
| Gold         | Norddeutsche Affinererie AG                                 | Germany                  | Unknown                                 |
| Gold         | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH | Austria                  | Conflict-Free                           |
| Gold         | Ohura Precious Metal Industry Co., Ltd.                     | Japan                    | Conflict-Free                           |

| <b>METAL</b> | <b>SMELTER OR REFINER NAME</b>  | <b>FACILITY LOCATION</b> | <b>CONFLICT-FREE STATUS<sup>1</sup></b> |
|--------------|---|--------------------------|---|
| Gold         | OJSC Novosibirsk Refinery   | Russia                   | Conflict-Free                           |
| Gold         | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | Russia                   | Conflict-Free                           |
| Gold         | PAMP S.A.   | Switzerland              | Conflict-Free                           |
| Gold         | Penglai Penggang Gold Industry Co., Ltd.                                    | China                    | Unknown                                 |
| Gold         | Planta Recuperadora de Metales SpA  | Chile                    | Conflict-Free                           |
| Gold         | Prioksky Plant of Non-Ferrous Metals  | Russia                   | Conflict-Free                           |
| Gold         | PT Aneka Tambang (Persero) Tbk  | Indonesia                | Conflict-Free                           |
| Gold         | PX Precinox S.A.  | Switzerland              | Conflict-Free                           |
| Gold         | Rand Refinery (Pty) Ltd.  | South Africa             | Conflict-Free                           |
| Gold         | Refinery of Seemine Gold Co., Ltd.  | China                    | Unknown                                 |
| Gold         | Remondis PMR B.V.   | Netherlands              | Conflict-Free                           |
| Gold         | Republic Metals Corporation   | USA                      | Unknown                                 |
| Gold         | Royal Canadian Mint   | Canada                   | Conflict-Free                           |
| Gold         | SAAMP   | France                   | Conflict-Free                           |
| Gold         | Sabin Metal Corp.   | USA                      | Unknown                                 |
| Gold         | Safimet S.p.A   | Italy                    | Conflict-Free                           |
| Gold         | Samduck Precious Metals   | Korea,<br>Republic Of    | Unknown                                 |
| Gold         | SAMWON Metals Corp.   | Korea,<br>Republic Of    | Unknown                                 |
| Gold         | SAXONIA Edelmetalle GmbH  | Germany                  | Conflict-Free                           |
| Gold         | Schone Edelmetaal B.V.  | Netherlands              | Unknown                                 |
| Gold         | SEMPSA Joyeria Plateria S.A.  | Spain                    | Conflict-Free                           |
| Gold         | Shandong Tiancheng Biological Gold Industrial Co., Ltd.                     | China                    | Unknown                                 |
| Gold         | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.                           | China                    | Conflict-Free                           |
| Gold         | Sichuan Tianze Precious Metals Co., Ltd.                                    | China                    | Conflict-Free                           |
| Gold         | Singway Technology Co., Ltd.  | Taiwan                   | Conflict-Free                           |
| Gold         | SOE Shyolkovsky Factory of Secondary Precious Metals                        | Russia                   | Conflict-Free                           |
| Gold         | Solar Applied Materials Technology Corp.                                    | Taiwan                   | Conflict-Free                           |
| Gold         | Sumitomo Metal Mining Co., Ltd.   | Japan                    | Conflict-Free                           |
| Gold         | SungEel HiMetal Co., Ltd.   | Korea,<br>Republic Of    | Conflict-Free                           |
| Gold         | Tanaka Kikinzoku Kogyo K.K.   | Japan                    | Conflict-Free                           |
| Gold         | Tanaka Denshi Kogyo K.K.  | Japan                    | Unknown                                 |

| <b>METAL</b> | <b>SMELTER OR REFINER NAME</b>                      | <b>FACILITY LOCATION</b> | <b>CONFLICT-FREE STATUS<sup>1</sup></b> |
|--------------|---|--------------------------|---|
| Gold         | T.C.A S.p.A   | Italy                    | Conflict-Free                           |
| Gold         | The Refinery of Shandong Gold Mining Co., Ltd.      | China                    | Conflict-Free                           |
| Gold         | Tokuriki Honten Co., Ltd.                           | Japan                    | Conflict-Free                           |
| Gold         | Tongling Nonferrous Metals Group Co., Ltd.          | China                    | Unknown                                 |
| Gold         | TOO Tau-Ken-Altyn                                   | Kazakhstan               | Unknown                                 |
| Gold         | Torecom   | Korea, Republic Of       | Conflict-Free                           |
| Gold         | Umicore Brasil Ltda.                                | Brazil                   | Conflict-Free                           |
| Gold         | Umicore Precious Metals Thailand                    | Thailand                 | Conflict-Free                           |
| Gold         | Umicore S.A. Business Unit Precious Metals Refining | Belgium                  | Conflict-Free                           |
| Gold         | United Precious Metal Refining, Inc.                | USA                      | Conflict-Free                           |
| Gold         | Valcambi S.A.                                       | Switzerland              | Conflict-Free                           |
| Gold         | Western Australian Mint (T/a The Perth Mint)        | Australia                | Conflict-Free                           |
| Gold         | WIELAND Edelmetalle GmbH                            | Germany                  | Conflict-Free                           |
| Gold         | Yamakin Co., Ltd.                                   | Japan                    | Conflict-Free                           |
| Gold         | Yamamoto Precious Metal Co., Ltd.                   | Japan                    | Unknown                                 |
| Gold         | YangTai ZHAOJIN Kanfort Precious Metal Co., Ltd     | China                    | Unknown                                 |
| Gold         | Yokohama Metal Co., Ltd.                            | Japan                    | Conflict-Free                           |
| Gold         | Yunnan Copper Industry Co., Ltd.                    | China                    | Unknown                                 |
| Gold         | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | China                    | Conflict-Free                           |
| Tin          | Alpha   | USA                      | Conflict-Free                           |
| Tin          | An Vinh Joint Stock Mineral Processing Company      | Viet Nam                 | Unknown                                 |
| Tin          | Chengfeng Metals Co Pte Ltd                         | China                    | Unknown                                 |
| Tin          | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.   | China                    | Conflict-Free                           |
| Tin          | Chifeng Dajingzi Tin Industry Co., Ltd.             | China                    | Conflict-Free                           |
| Tin          | China Rare Metal Material Co., Ltd.                 | China                    | Conflict-Free                           |
| Tin          | China Tin (Hechi)                                   | China                    | Unknown                                 |
| Tin          | China Tin Lai Ben Smelter Co., Ltd.                 | China                    | Unknown                                 |
| Tin          | China Tin Group Co., Ltd.                           | China                    | Conflict-Free                           |
| Tin          | CNMC (Guangxi) PGMA Co., Ltd.                       | China                    | Unknown                                 |
| Tin          | Cooperativa Metalurgica de Rondônia Ltda.           | Brazil                   | Unknown                                 |
| Tin          | CooperMetal   | Brazil                   | Unknown                                 |
| Tin          | Coopersanta   | Brazil                   | Unknown                                 |
| Tin          | CV Ayi Jaya   | Indonesia                | Conflict-Free                           |

| <b>METAL</b> | <b>SMELTER OR REFINER NAME</b>  | <b>FACILITY LOCATION</b> | <b>CONFLICT-FREE STATUS<sup>1</sup></b> |
|--------------|---|--------------------------|---|
| Tin          | CV Dua Sekawan  | Indonesia                | Conflict-Free                           |
| Tin          | CV Gita Pesona  | Indonesia                | Conflict-Free                           |
| Tin          | CV Serumpun Sebalai   | Indonesia                | Unknown                                 |
| Tin          | CV Tiga Sekawan   | Indonesia                | Unknown                                 |
| Tin          | CV United Smelting  | Indonesia                | Conflict-Free                           |
| Tin          | CV Venus Inti Perkasa   | Indonesia                | Conflict-Free                           |
| Tin          | Dowa  | Japan                    | Conflict-Free                           |
| Tin          | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | Viet Nam                 | Unknown                                 |
| Tin          | Electroloy Metal (Shenzhen) Co.,Ltd   | China                    | Unknown                                 |
| Tin          | EM Vinto  | Bolivia                  | Conflict-Free                           |
| Tin          | ENAF  | Bolivia                  | Unknown                                 |
| Tin          | Estanho de Rondonia S.A.  | Brazil                   | Unknown                                 |
| Tin          | Fenix Metals  | Poland                   | Conflict-Free                           |
| Tin          | Geiju City Datun Chengfeng Smelter  | China                    | Unknown                                 |
| Tin          | Gejiu Fengming Metallurgy Chemical Plant  | China                    | Conflict-Free                           |
| Tin          | Gejiu Jinye Mineral Company Ltd.  | China                    | Conflict-Free                           |
| Tin          | Gejiu Kai Meng Industry and Trade LLC   | China                    | Conflict-Free                           |
| Tin          | Gejiu Non-Ferrous Metal Processing Co., Ltd.  | China                    | Conflict-Free                           |
| Tin          | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.  | China                    | Conflict-Free                           |
| Tin          | Gejiu Zili Mining And Metallurgy Co., Ltd.  | China                    | Conflict-Free                           |
| Tin          | Guangdong Hanhe Non-Ferrous Metal Co., Ltd.   | China                    | Conflict-Free                           |
| Tin          | GuangXi China Tin   | China                    | Unknown                                 |
| Tin          | Guanyang Guida Nonferrous Metal Smelting Plant  | China                    | Conflict-Free                           |
| Tin          | HuiChang Hill Tin Industry Co., Ltd.  | China                    | Conflict-Free                           |
| Tin          | Huichang Jinshunda Tin Co., Ltd.  | China                    | Conflict-Free                           |
| Tin          | Indonesian State Tin Corporation Mentok Smelter                                       | Indonesia                | Unknown                                 |
| Tin          | Jiangxi Dinghai Tantalum & Niobium Co., LTD   | China                    | Unknown                                 |
| Tin          | Jiangxi Ketai Advanced Material Co., Ltd.   | China                    | Unknown                                 |
| Tin          | Jiangxi New Nanshan Technology Ltd.   | China                    | Conflict-Free                           |
| Tin          | Magnu's Minerai's Metais e Ligas Ltda.  | Brazil                   | Conflict-Free                           |
| Tin          | Malaysia Smelting Corporation (MSC)   | Malaysia                 | Conflict-Free                           |
| Tin          | Melt Metais e Ligas S.A.  | Brazil                   | Conflict-Free                           |
| Tin          | Mentok Smelter  | Indonesia                | Unknown                                 |

| <b>METAL</b> | <b>SMELTER OR REFINER NAME</b>                   | <b>FACILITY LOCATION</b> | <b>CONFLICT-FREE STATUS<sup>1</sup></b> |
|--------------|--|--------------------------|---|
| Tin          | Metallic Resources, Inc.                         | USA                      | Conflict-Free                           |
| Tin          | Metallo Belgium N.V.                             | Belgium                  | Conflict-Free                           |
| Tin          | Metallo-Chimique N.V.                            | Belgium                  | Unknown                                 |
| Tin          | Metallo Spain S.L.U.                             | Spain                    | Conflict-Free                           |
| Tin          | Metalurgical S.A.                                | Bolivia                  | Conflict-Free                           |
| Tin          | Mineracao Taboca S.A.                            | Brazil                   | Conflict-Free                           |
| Tin          | Minsur   | Peru                     | Conflict-free                           |
| Tin          | Mitsubishi Materials Corporation                 | Japan                    | Conflict-free                           |
| Tin          | Modeltech Sdn Bhd                                | Malaysia                 | Conflict-Free                           |
| Tin          | Nankang Nanshan Tin Manufactory Co., Ltd.        | China                    | Unknown                                 |
| Tin          | Nghe Tinh Non-Ferrous Metals Joint Stock Company | Viet Nam                 | Unknown                                 |
| Tin          | O.M. Manufacturing (Thailand) Co., Ltd.          | Thailand                 | Conflict-Free                           |
| Tin          | O.M. Manufacturing Philippines, Inc.             | Philippines              | Conflict-Free                           |
| Tin          | Operaciones Metalurgical S.A.                    | Bolivia                  | Conflict-Free                           |
| Tin          | PT Aries Kencana Sejahtera                       | Indonesia                | Conflict-Free                           |
| Tin          | PT Artha Cipta Langgeng                          | Indonesia                | Conflict-Free                           |
| Tin          | PT ATD Makmur Mandiri Jaya                       | Indonesia                | Conflict-Free                           |
| Tin          | PT Babel Inti Perkasa                            | Indonesia                | Conflict-Free                           |
| Tin          | PT Bangka Prima Tin                              | Indonesia                | Conflict-Free                           |
| Tin          | PT Bangka Serumpun                               | Indonesia                | Conflict-Free                           |
| Tin          | PT Bangka Tin Industry                           | Indonesia                | Conflict-Free                           |
| Tin          | PT Belitung Industri Sejahtera                   | Indonesia                | Conflict-Free                           |
| Tin          | PT Bukit Timah                                   | Indonesia                | Conflict-Free                           |
| Tin          | PT DS Jaya Abadi                                 | Indonesia                | Conflict-Free                           |
| Tin          | PT Eunindo Usaha Mandiri                         | Indonesia                | Unknown                                 |
| Tin          | PT Inti Stania Prima                             | Indonesia                | Conflict-Free                           |
| Tin          | PT JusTindo                                      | Indonesia                | Unknown                                 |
| Tin          | PT Karimun Mining                                | Indonesia                | Conflict-Free                           |
| Tin          | PT Kijang Jaya Mandiri                           | Indonesia                | Conflict-Free                           |
| Tin          | PT Lautan Harmonis Sejahtera                     | Indonesia                | Conflict-Free                           |
| Tin          | PT Menara Cipta Mulia                            | Indonesia                | Conflict-Free                           |
| Tin          | PT Mitra Stania Prima                            | Indonesia                | Conflict-Free                           |
| Tin          | PT Panca Mega Persada                            | Indonesia                | Conflict-Free                           |
| Tin          | PT Premium Tin Indonesia                         | Indonesia                | Conflict-Free                           |

| <b>METAL</b> | <b>SMELTER OR REFINER NAME</b>                     | <b>FACILITY LOCATION</b> | <b>CONFLICT-FREE STATUS<sup>1</sup></b> |
|--------------|--|--------------------------|---|
| Tin          | PT Prima Timah Utama                               | Indonesia                | Conflict-Free                           |
| Tin          | PT Refined Bangka Tin                              | Indonesia                | Conflict-Free                           |
| Tin          | PT Sariwiguna Binasentosa                          | Indonesia                | Conflict-Free                           |
| Tin          | PT Stanindo Inti Perkasa                           | Indonesia                | Conflict-Free                           |
| Tin          | PT Sukses Inti Makmur                              | Indonesia                | Conflict-Free                           |
| Tin          | PT Sumber Jaya Indah                               | Indonesia                | Conflict-Free                           |
| Tin          | PT Tambang Timah                                   | Indonesia                | Unknown                                 |
| Tin          | PT Timah (Persero) Tbk Kundur                      | Indonesia                | Conflict-Free                           |
| Tin          | PT Timah (Persero) Tbk Mentok                      | Indonesia                | Conflict-Free                           |
| Tin          | PT Tinindo Inter Nusa                              | Indonesia                | Conflict-Free                           |
| Tin          | PT Tommy Utama                                     | Indonesia                | Conflict-Free                           |
| Tin          | PT Wahana Perkit Jaya                              | Indonesia                | Unknown                                 |
| Tin          | Resind Industria e Comercio Ltda.                  | Brazil                   | Conflict-Free                           |
| Tin          | Rui Da Hung  | Taiwan                   | Conflict-Free                           |
| Tin          | Soft Metais Ltda.                                  | Brazil                   | Conflict-Free                           |
| Tin          | Super Ligas  | Brazil                   | Unknown                                 |
| Tin          | Thaisarco  | Thailand                 | Conflict-Free                           |
| Tin          | Tuyen Quang Non-Ferrous Metals Joint Stock Company | Viet Nam                 | Unknown                                 |
| Tin          | VQB Mineral and Trading Group JSC                  | Viet Nam                 | Unknown                                 |
| Tin          | White Solder Metalurgia e Mineracao Ltda.          | Brazil                   | Conflict-Free                           |
| Tin          | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.      | China                    | Conflict-Free                           |
| Tin          | Yunnan Tin Company Limited                         | China                    | Conflict-Free                           |
| Tin          | Yuntinic Resources                                 | China                    | Unknown                                 |
| Tantalum     | Asaka Riken Co., Ltd.                              | Japan                    | Conflict-Free                           |
| Tantalum     | Cabot  | USA                      | Unknown                                 |
| Tantalum     | Changsha South Tantalum Niobium Co., Ltd.          | China                    | Conflict-Free                           |
| Tantalum     | Conghua Tantalum and Niobium Smeltry               | China                    | Unknown                                 |
| Tantalum     | D Block Metals, LLC                                | USA                      | Conflict-Free                           |
| Tantalum     | Douluoshan Sapphire Rare Metal Co Ltd              | China                    | Unknown                                 |
| Tantalum     | Duoluoshan   | China                    | Unknown                                 |
| Tantalum     | Exotech Inc.                                       | USA                      | Conflict-Free                           |
| Tantalum     | F&X Electro-Materials Ltd.                         | China                    | Conflict-Free                           |
| Tantalum     | FIR Metals & Resource Ltd.                         | China                    | Conflict-Free                           |

| <b>METAL</b> | <b>SMELTER OR REFINER NAME</b>                    | <b>FACILITY LOCATION</b> | <b>CONFLICT-FREE STATUS<sup>1</sup></b> |
|--------------|---|--------------------------|---|
| Tantalum     | Global Advanced Metals Aizu                       | Japan                    | Conflict-Free                           |
| Tantalum     | Global Advanced Metals Boyertown                  | USA                      | Conflict-Free                           |
| Tantalum     | Guangdong Rising Rare Metals-EO Materials Ltd.    | China                    | Conflict-Free                           |
| Tantalum     | Guangdong Zhiyuan New Material Co., Ltd.          | China                    | Conflict-Free                           |
| Tantalum     | H.C. Starck Co., Ltd.                             | Thailand                 | Conflict-Free                           |
| Tantalum     | H.C. Starck GmbH Goslar                           | Germany                  | Unknown                                 |
| Tantalum     | H.C. Starck Hermsdorf GmbH                        | Germany                  | Conflict-Free                           |
| Tantalum     | H.C. Starck Inc.                                  | USA                      | Conflict-Free                           |
| Tantalum     | H.C. Starck Ltd.                                  | Japan                    | Conflict-Free                           |
| Tantalum     | H.C. Starck Smelting GmbH & Co. KG                | Germany                  | Conflict-Free                           |
| Tantalum     | H.C. Starck Tantalum and Niobium GmbH             | Germany                  | Conflict-Free                           |
| Tantalum     | Hengyang King Xing Lifeng New Materials Co., Ltd. | China                    | Conflict-Free                           |
| Tantalum     | Hi-Temp Specialty Metals, Inc.                    | USA                      | Unknown                                 |
| Tantalum     | Jiangxi Dinghai Tantalum & Niobium Co., Ltd.      | China                    | Conflict-Free                           |
| Tantalum     | Jiangxi Tuohong New Raw Material                  | China                    | Conflict-Free                           |
| Tantalum     | Jiujiang Janny New Material Co., Ltd.             | China                    | Conflict-Free                           |
| Tantalum     | JiuJiang JinXin Nonferrous Metals Co., Ltd.       | China                    | Conflict-Free                           |
| Tantalum     | Jiujiang Tanbre Co., Ltd.                         | China                    | Conflict-Free                           |
| Tantalum     | Jiujiang Zhongao Tantalum & Niobium Co., Ltd.     | China                    | Conflict-Free                           |
| Tantalum     | Johnson Matthey Inc                               | USA                      | Unknown                                 |
| Tantalum     | KEMET Blue Metals                                 | Mexico                   | Conflict-Free                           |
| Tantalum     | KEMET Blue Powder                                 | USA                      | Conflict-Free                           |
| Tantalum     | King-Tan Tantalum Industry Ltd.                   | China                    | Unknown                                 |
| Tantalum     | LSM Brasil S.A.                                   | Brazil                   | Conflict-Free                           |
| Tantalum     | Metallurgical Products India Pvt., Ltd.           | India                    | Conflict-Free                           |
| Tantalum     | Mineracao Taboca S.A.                             | Brazil                   | Conflict-Free                           |
| Tantalum     | Mitsui Mining and Smelting Co., Ltd.              | Japan                    | Conflict-Free                           |
| Tantalum     | Molycorp Silmet A.S.                              | Estonia                  | Unknown                                 |
| Tantalum     | NPM Silmet AS                                     | Estonia                  | Conflict-Free                           |
| Tantalum     | Ningxia Orient Tantalum Industry Co., Ltd.        | China                    | Conflict-Free                           |
| Tantalum     | Plansee SE Liezen                                 | Austria                  | Unknown                                 |
| Tantalum     | Plansee SE Reutte                                 | Austria                  | Unknown                                 |
| Tantalum     | Power Resources Ltd.                              | Macedonia                | Conflict-Free                           |
| Tantalum     | QuantumClean                                      | USA                      | Conflict-Free                           |

| <b>METAL</b> | <b>SMELTER OR REFINER NAME</b>  | <b>FACILITY LOCATION</b> | <b>CONFLICT-FREE STATUS<sup>1</sup></b> |
|--------------|---|--------------------------|---|
| Tantalum     | Resind Industria e Comercio Ltda.   | Brazil                   | Conflict-Free                           |
| Tantalum     | RFH Tantalum Smeltery Co., Ltd./Yanling Jincheng Tantalum & Niobium Co., Ltd. | China                    | Conflict-Free                           |
| Tantalum     | Solikamsk Magnesium Works OAO   | Russia                   | Conflict-Free                           |
| Tantalum     | Taki Chemical Co., Ltd.   | Japan                    | Conflict-Free                           |
| Tantalum     | Telex Metals  | USA                      | Conflict-Free                           |
| Tantalum     | Ulba Metallurgical Plant JSC  | Kazakhstan               | Conflict-Free                           |
| Tantalum     | XinXing HaoRong Electronic Material Co., Ltd.                                 | China                    | Conflict-Free                           |
| Tantalum     | Yichun Jin Yang Rare Metal Co., Ltd.  | China                    | Unknown                                 |
| Tantalum     | Zhuzhou Cemented Carbide  | China                    | Unknown                                 |
| Tungsten     | A.L.M.T. TUNGSTEN Corp.   | Japan                    | Unknown                                 |
| Tungsten     | ACL Metais Eireli   | Brazil                   | Conflict-Free                           |
| Tungsten     | Asia Tungsten Products Vietnam Ltd.   | Viet Nam                 | Unknown                                 |
| Tungsten     | Chenzhou Diamond Tungsten Products Co., Ltd.                                  | China                    | Conflict-Free                           |
| Tungsten     | China Minmetals Corp.   | China                    | Unknown                                 |
| Tungsten     | Chongyi Zhangyuan Tungsten Co., Ltd.  | China                    | Conflict-Free                           |
| Tungsten     | Fujian Jinxin Tungsten Co., Ltd.  | China                    | Conflict-Free                           |
| Tungsten     | Ganzhou Huaxing Tungsten Products Co., Ltd.                                   | China                    | Conflict-Free                           |
| Tungsten     | Ganzhou Jiangwu Ferrotungsten Co., Ltd.                                       | China                    | Conflict-Free                           |
| Tungsten     | Ganzhou Seadragon W & Mo Co., Ltd.  | China                    | Conflict-Free                           |
| Tungsten     | Ganzhou Yatai Tungsten Co., Ltd.  | China                    | Unknown                                 |
| Tungsten     | Global Tungsten & Powders Corp.   | USA                      | Conflict-Free                           |
| Tungsten     | Guangdong Xianglu Tungsten Co., Ltd.  | China                    | Conflict-Free                           |
| Tungsten     | H.C. Starck Smelting GmbH & Co. KG  | Germany                  | Conflict-Free                           |
| Tungsten     | H.C. Starck Tungsten GmbH   | Germany                  | Conflict-Free                           |
| Tungsten     | Hunan Chenzhou Mining Co., Ltd.   | China                    | Conflict-Free                           |
| Tungsten     | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji                               | China                    | Conflict-Free                           |
| Tungsten     | Hunan Chunchang Nonferrous Metals Co., Ltd.                                   | China                    | Conflict-Free                           |
| Tungsten     | Hydrometallurg, JSC   | Russian                  | Conflict-Free                           |
| Tungsten     | Japan New Metals Co., Ltd.  | Japan                    | Conflict-Free                           |
| Tungsten     | Jiangwu H.C. Starck Tungsten Products Co., Ltd.                               | China                    | Conflict-Free                           |
| Tungsten     | Jiangxi Dayu Longxintai Tungsten Co., Ltd.                                    | China                    | Unknown                                 |
| Tungsten     | Jiangxi Gan Bei Tungsten Co., Ltd.  | China                    | Conflict-Free                           |
| Tungsten     | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.                         | China                    | Unknown                                 |

| <b>METAL</b> | <b>SMELTER OR REFINER NAME</b>                                | <b>FACILITY LOCATION</b> | <b>CONFLICT-FREE STATUS<sup>1</sup></b> |
|--------------|---|--------------------------|---|
| Tungsten     | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | China                    | Conflict-Free                           |
| Tungsten     | Jiangxi Xinsheng Tungsten Industry Co., Ltd.                  | China                    | Conflict-Free                           |
| Tungsten     | Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd.          | China                    | Unknown                                 |
| Tungsten     | Jiangxi Yaosheng Tungsten Co., Ltd.                           | China                    | Conflict-Free                           |
| Tungsten     | Kennametal Fallon   | USA                      | Conflict-Free                           |
| Tungsten     | Kennametal Huntsville   | USA                      | Conflict-Free                           |
| Tungsten     | Malipo Haiyu Tungsten Co., Ltd.                               | China                    | Conflict-Free                           |
| Tungsten     | Moliren Ltd.  | Russian                  | Conflict-Free                           |
| Tungsten     | Niagara Refining LLC  | USA                      | Conflict-Free                           |
| Tungsten     | Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC     | Viet Nam                 | Unknown                                 |
| Tungsten     | Philippine Chuangxin Industrial Co., Inc.                     | Philippines              | Conflict-Free                           |
| Tungsten     | South-East Nonferrous Metal Company Limited of Hengyang City  | China                    | Conflict-Free                           |
| Tungsten     | Tejing (Vietnam) Tungsten Co., Ltd.                           | Viet Nam                 | Conflict-Free                           |
| Tungsten     | Unecha Refractory metals plant                                | Russian                  | Conflict-Free                           |
| Tungsten     | Vietnam Youngsun Tungsten Industry Co., Ltd.                  | Viet Nam                 | Unknown                                 |
| Tungsten     | Wolfram Bergbau und Hutten AG                                 | Austria                  | Conflict-Free                           |
| Tungsten     | Wolfram JSC   | Russia                   | Unknown                                 |
| Tungsten     | Woltech Korea Co., Ltd.                                       | Korea, Republic Of       | Conflict-Free                           |
| Tungsten     | Xiamen Tungsten Co., Ltd.                                     | China                    | Conflict-Free                           |
| Tungsten     | Xiamen Tungsten (H.C.) Co., Ltd.                              | China                    | Conflict-Free                           |
| Tungsten     | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.   | China                    | Conflict-Free                           |
| Tungsten     | Xinhai Rendan Shaoguan Tungsten Co., Ltd.                     | China                    | Conflict-Free                           |

## Annex II

|                    |                      |
|--------------------|----------------------|
| USA                | Australia            |
| Japan              | United Arab Emirates |
| Germany            | Uzbekistan           |
| Brazil             | Switzerland          |
| Turkey             | South Africa         |
| India              | Philippines          |
| Sweden             | Mexico               |
| Canada             | Italy                |
| Korea, Republic Of | Peru                 |
| Russia             | Kazakhstan           |
| Poland             | Kyrgyzstan           |
| Saudi Arabia       | Singapore            |
| Bolivia            | Malaysia             |
| New Zealand        | Chile                |
| Austria            | Netherlands          |
| Indonesia          | Spain                |
| France             | Thailand             |
| Taiwan             | Viet Nam             |
| Belgium            | Macedonia            |