

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 of incorporation or organization) | (Commission File Number) | (IRS Employer Identification No.) |
| 60th Floor, The Center 99 Queen's Road Central Hong Kong, China | | N/A |
| (Address of principal executive offices) | | (Postal Code) |

Grace Wong
Company Secretary
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:

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2019.

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 conducted by China Mobile, and the results thereof, are described in the Conflict Minerals Report, which 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 report.

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/ Yang Jie
YANG Jie
Executive Director and Chairman

Date: May 20, 2020

EXHIBIT 1.01 – CONFLICT MINERALS REPORT

China Mobile Limited

Conflict Minerals Report

For The Year Ended December 31, 2019

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, 2019 (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”) contain 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.

We provide full communications services, including mobile, wireline broadband and Internet of Things (“IoT”) services, in all 31 provinces, autonomous regions and directly-administered municipalities in Mainland China as well as in Hong Kong Special Administrative Region. Based on publicly available information, we are the leading provider of telecommunications and related services in Mainland China and the largest provider of telecommunications and related services in the world as measured by the total number of mobile customers as of December 31, 2019. As of March 31, 2020, our total number of mobile customers reached approximately 946 million.

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 certain of our wholly-owned subsidiaries and business units (collectively, the “Device Subsidiaries”) to be manufactured by third parties. China Mobile has determined that “conflict minerals” (also referred to herein as “3TG”) are necessary to the functionality or production of certain Products that China Mobile engaged third party manufacturers to produce during the Reporting Period. See “III. Product Description.”

B. Reasonable Country of Origin Inquiry

In accordance with the Conflict Minerals Rule, China Mobile’s compliance procedure includes a reasonable country of origin inquiry (“RCOI”) seeking to identify the location of the smelter/refiner facilities used to refine or process the 3TG used in Products. 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 RCOI focused on its direct suppliers.

Specifically, in January 2020, China Mobile coordinated with each of its consolidated subsidiaries and requested 159 direct suppliers to complete a Conflict Minerals Reporting Template (the “CMRT”). Each of these direct suppliers supplied Products, some of which were manufactured by certain of these suppliers, to China Mobile during the Reporting Period. The CMRT was developed by the Responsible Minerals Initiative (“RMI”, see <http://www.responsiblemineralsinitiative.org/>) to assist companies in determining the smelter/refiner facilities contributing 3TG to their products and requests information regarding the supplier’s own “conflict minerals” diligence policies, in addition to the identification of smelter/refiner facilities within the supply chain, and the country of origin of the 3TG used by such facilities. Based on responses received from these direct suppliers, China Mobile identified that Products of 129 direct suppliers contained 3TG during the Reporting Period. China Mobile then further assessed such direct suppliers’ CMRT responses using data provided by RMI and identified that Products supplied by two suppliers contained conflict minerals that were originated from the Democratic Republic of the Congo (the “DRC”) or an adjoining country as defined in the instructions to Form SD (together with DRC, the “Covered Countries”) and were not from recycled or scrap sources. However, there remains a risk that conflict minerals used in Products supplied by other suppliers may have originated in a Covered Country and may not be from recycled or scrap sources due to, among others, the incompleteness of the direct suppliers’ CMRT responses. See “II. Due Diligence—B. Due Diligence Measures—(ii) Identify and assess risks in the supply chain”. Therefore, China Mobile conducted due diligence on the source and chain of custody of the conflict minerals contained in Products supplied to it by its direct suppliers for the Reporting Period.

II. Due Diligence

A. Design of Due Diligence

In addition to China Mobile’s compliance with the due diligence required by the Conflict Minerals Rule, China Mobile has adopted a five-step framework recommended by the Organization for Economic Co-operation and Development in its Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition (2016)) (the “OECD Guidance”) as applicable for “downstream companies” (as 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 a comprehensive compliance program:
 - 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. The policy communicates China Mobile’s goal to procure and use materials free from conflict minerals originated from Covered Countries and the source-tracing supply chain inquiries and cooperation with suppliers to achieve such goal. The guidelines lay out certain detailed steps and specific measures China Mobile is required to undertake to carry out conflict minerals due diligence. The policy and guidelines can be found at <https://www.chinamobileltd.com/en/about/sd.php>.

- b. In March 2017, China Mobile established a working group to handle conflict minerals related matters. The team includes representatives from China Mobile’s Legal and Regulatory Department and the Device Subsidiaries. In addition, China Mobile’s 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 uses its direct suppliers’ CMRT responses to determine the chain of custody of 3TG contained in Products.
 - d. The Device Subsidiaries communicate to their suppliers about China Mobile’s policies and guidelines in connection with the Conflict Mineral Rule and require the suppliers not to purchase conflict minerals originated in Covered Countries and to extend such requirements to their suppliers. Moreover, China Mobile Device, Government and Enterprise Service Company (“G&E”) and China Mobile Online Services Co., Ltd. (“OSC”) have incorporated a term on conflict minerals into certain 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. China Mobile IoT Company Limited (“China Mobile IoT”) intends to incorporate such term to their supplier contracts in a step-by-step manner. MIGU Co., Ltd. (“MIGU”), has added such term in the technical specifications in the annex of some of their supplier contracts. China Mobile (Suzhou) Software Technology Co., Ltd. (“Suzhou R&D”) and China Mobile (Hangzhou) Information Technology Company Limited (“Hangzhou R&D”) communicate with their respective suppliers about our RCOI and require them to incorporate a term into their contracts or sign a commitment not to purchase conflict minerals originated in Covered Countries.
 - e. China Mobile organizes internal trainings among China Mobile group companies for issues ranging from the Conflict Mineral Rule and disclosure requirements thereunder to China Mobile’s conflict minerals policies and related due diligence guidelines. China Mobile also conveys such compliance requirements to its suppliers as appropriate.
- (ii) Identify and assess risks in the supply chain:
- a. In each January, China Mobile coordinated with each of its consolidated subsidiaries to identify the Devices Subsidiaries for the preceding year and requests the direct suppliers from which the Device Subsidiaries procured any Product containing 3TG that have been contracted out by China Mobile for manufacturing during the preceding year to respond to the supply chain survey.

During the Reporting Period, China Mobile had seven Device Subsidiaries, namely (i) China Mobile Device, an entity engaged in the procurement and distribution of mobile telephones, tablets and other devices; (ii) MIGU, an entity established for the provision, operation and service integration of digital content products, which includes

music, video, reading, games and animation businesses; (iii) China Mobile IoT, 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 vehicles, smart home devices and smart wearables; (iv) G&E, an entity mainly engaged 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; (v) Hangzhou R&D, an entity that engages in developing network equipment as well as providing information technology support for mobile terminals, software and related services; (vi) Suzhou R&D, an entity engaged in business development, software sales, system integration and others in the fields of cloud computing, big data and IT support; and (vii) OSC, an entity that mainly provides customers with digital and intelligent services. China Mobile requested each of the direct suppliers to such Device Subsidiaries for Products containing 3TG to respond to the supply chain survey.

- b. China Mobile adopted the CMRT 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 results of the supply chain survey are reported annually to the Audit Committee under the board of directors of China Mobile.

After assessing the risks in its supply chain during the Reporting Period, 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 measures to respond to and mitigate identified risks:
 - a. To evaluate and respond to identified risks, China Mobile relies on the suppliers' responses to the CMRT. Since 2015, China Mobile has compared the names of the smelters and refiners identified in such responses against RMI's Conformant Smelters & Refiners Lists, which set forth smelters and refiners that had successfully completed an assessment against RMI's applicable responsible minerals assurance process standard ("RMAP") or an equivalent cross-recognized assessment.
 - b. Pursuant to China Mobile's policies and guidelines regarding conflict minerals, for suppliers that procured 3TGs from smelters and refiners that are not included in RMI's Conformant Smelters & Refiners List or if China Mobile becomes aware of any Product containing 3TG originated from the Covered Countries, China Mobile shall temporarily suspend trade with the relevant suppliers in order to achieve measurable risk mitigation, or terminate commercial relationships with such suppliers after risk mitigation attempts fail or where risk mitigation is not feasible. As of the filing date of this report, we have identified two such suppliers.
- (iv) Carry out independent third party audit of the due diligence practices in the supply chain:

As a downstream supplier of finished products, China Mobile has no direct commercial relationships with smelters or refiners. China Mobile's due diligence efforts rely on cross-industry initiatives, such as RMI, to conduct audits of the due diligence practices at identified points of the smelters and refiners in the supply chain.

(v) Report annually on supply chain due diligence:

China Mobile reports 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 process and to further mitigate any risk that conflict minerals 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 directs them to obtain responses from all lower tier suppliers subject to the RCOI survey, and to improve the accuracy and completeness of the contents 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.
- (iv) China Mobile conducts multiple checks on RCOI survey responses from direct suppliers to improve accuracy of those responses.

III. Product Description

Based on the due diligence efforts described above, China Mobile is unable to determine the source of the conflict minerals used in the following Products:

| Product / Model | Description |
|---|--|
| N5 / N5 Pro / M970 / A5 / A6 / K3 | Mobile Phone |
| CM201-2 / MIGU / M301A / M301H | Set-Top Box |
| H1s-2 / H1Ne / H10g-01 / H10g-ins / H2-3s / H2-2 / H2-2s / GM220-S / GM620 / GS2101 / GS3101 / P2Sg / P33g / S21g-01 / S21g-ins / SE-CPBGG00 / SE-CPBMS00 / SE-CPBLG00 / SE-CPBNG00 | Smart Internet Gateway |
| FR01 / FG1201 | 5G CPE |
| T1X43 / T1X49 / T1X55 | Smart TV |
| LDY-A1 / MIGU / OB-01 / SL1 | Smart Speaker |
| OE-01 | Smart Pen |
| L-el213 / L-el290 / L-el420 / L-r1 | Electronic Shelf Label |
| BC-Metal | General Server |
| Arcvideo Director / Arcvideo Direct Terminal / and-Backpack / and-Belt-bag | All-In-One Live Broadcast and Direct Hub |
| AH-LINK022 / AN1202L / AN1209 / AN1301M / AN1301P / W1 / W2 | Router |
| C12 / C13 / C31 / H31 / H51 / P21 | Cloud Video Conference Terminal |
| D33 | Desktop Video Conference Terminal |
| C12 / C2X / C31 / D12 / D22 / H11 / H12 / S11 / S12 | Walkie talkie |
| H32 | e-Learning Terminal |
| MIGU | Smart Body Fat Scale |
| A10 | Remote Controller |
| A2X / E2X / C12 / C12e / C13 / C13c / C13e / C15 / C15_4G / C16 / C20 / C23 / C31 / C31PRO / C37 / C50 / C52 / C53 / C70 / C71 / C72_4G / C73 / C80 / N80 / N2X / S2X / V1 | IP Camera |
| C01 / C03 / D02 / D03 / D06 | Car Locator |
| CR03 | Driving Recorder |
| IMU-AL03 / IMU-AL06 / M5310-A / M5311 / M5312 / M5313 / M5330 / ML302 / ML303 / W01D / W02S / W03S | Module |
| MW1 | MESH-ODM |
| C2 / CW1A / CW2A | Kid Watch |
| W1A | Sport Watch |
| T1A | Telephone |
| ED1A | ETC |
| NS1A | Smoke Detector |
| DWE1A | WIFI Amplifier |

| Product / Model | Description |
|---|-------------------------------|
| SE-D11 | Mobile Phone Wireless Charger |
| F2A | Femtocell |
| AH-PLC001-EN21 | Electricity Cat |
| D2 / H1 / M1 / M1F / M2 / M3 / M4A / M4B / P1 / P2 / R1 / R2 / R4 | Face Scanner |
| SE-LC-P-S01 / SE-LC-P-S01X / SE-LC-P-D01 / SE-LC-P-D01X / SE-LC-G-S01 / SE-LC-G-S01X / SE-LC-G-D01 / SE-LC-G-D01X / SE-LC-N-S01 / SE-LC-N-S01X / SE-LC-N-D01 / SE-LC-N-D01X | Street light controller |

As part of its due diligence, China Mobile endeavors to determine the countries of origin of the necessary conflict minerals in Products with the greatest possible specificity. Based on the information provided by the 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 Products include those countries listed in Annex II below.

Annex I

| METAL | SMELTER OR REFINER NAME | FACILITY LOCATION | CONFLICT-FREE STATUS¹ |
|--------------|---|--------------------------|---|
| Gold | 8853 S.p.A. | Italy | Conflict-free |
| Gold | Abington Reldan Metals, LLC | USA | Unknown |
| Gold | Advanced Chemical Company | USA | Conflict-free |
| Gold | Aida Chemical Industries Co., Ltd. | Japan | Conflict-free |
| Gold | Al Etihad Gold LLC | United Arab Emirates | Unknown |
| 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 Corrego do Sitio 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 | Asahi Refining Canada Ltd. | Canada | Conflict-free |
| Gold | Asaka Riken Co., Ltd. | Japan | Conflict-free |
| Gold | ASUSTeK Computer Inc. | China | Unknown |
| Gold | Atasay Kuyumculuk Sanayi Ve Ticaret A.S. | Turkey | Unknown |
| Gold | Aurubis AG | Germany | Conflict-free |
| Gold | AU Traders and Refiners | South Africa | 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 | Conflict-free |
| Gold | Daejin Indus Co., Ltd. | South Korea | Unknown |
| Gold | Daye Non-Ferrous Metals Mining Ltd. | China | Unknown |
| Gold | Degussa Sonne / Mond Goldhandel GmbH | Germany | Unknown |
| Gold | DSC (Do Sung Corporation) | South Korea | Conflict-free |
| Gold | DODUCO Contacts and Refining GmbH | Germany | Conflict-free |
| Gold | Dowa | Japan | Conflict-free |

¹ This categorization is based on the RMI standards. All RMI-Conflict-free smelters or refiners are listed here as conflict-free.

| | | | |
|------|---|----------------------|---------------|
| Gold | DS PRETECH Co., Ltd. | South Korea | Conflict-free |
| Gold | Eco-System Recycling Co., Ltd. | Japan | Conflict-free |
| Gold | Elemetal Refining, LLC | USA | Conflict-free |
| Gold | Emirates Gold DMCC | United Arab Emirates | Conflict-free |
| Gold | FSE Novosibirsk Refinery | Russia | Unknown |
| 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 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. | South Korea | Unknown |
| Gold | Heimerle + Meule GmbH | Germany | Conflict-free |
| Gold | Heraeus Ltd. Hong Kong | China | Unknown |
| Gold | Heraeus Metals Hong Kong Ltd. | China | Conflict-free |
| Gold | Heraeus Precious Metals GmbH & Co. KG | Germany | Conflict-free |
| Gold | Hunan Chenzhou Mining Co., Ltd. | China | Unknown |
| Gold | Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd. | China | Unknown |
| Gold | HwaSeong CJ CO., LTD. | South Korea | 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 | JSC Ekaterinburg Non-Ferrous Metal Processing Plant | Russia | Unknown |
| Gold | JSC Uralelectromed | Russia Federation | Conflict-free |
| Gold | JX Nippon Mining & Metals Co., Ltd. | Japan | Conflict-free |
| Gold | Kazakhmys Smelting LLC | Kazakhstan | Unknown |
| Gold | Kazzinc | Kazakhstan | Conflict-free |
| Gold | Kennecott Utah Copper LLC | USA | Conflict-free |
| Gold | KGHM Polska Miedz Spolka Akcyjna | Poland | Conflict-free |
| Gold | Kojima Chemicals Co., Ltd. | Japan | Conflict-free |
| Gold | Korea Zinc Co., Ltd. | South Korea | 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. | South Korea | 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 (Hong Kong) Ltd. | China | Conflict-free |
| Gold | Metalor Technologies (Singapore) Pte., Ltd. | Singapore | Conflict-free |
| Gold | Metalor Technologies (Suzhou) Ltd. | China | Conflict-free |
| Gold | Metalor Technologies S.A. | Switzerland | 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 | Morris and Watson Gold Coast | Australia | 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 | NH Recytech Company | South Korea | Unknown |
| Gold | Nihon Material Co., Ltd. | Japan | Conflict-free |
| Gold | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH | Austria | Conflict-free |
| Gold | OJSC Novosibirsk Refinery | Russia | Conflict-free |
| Gold | Ohura Precious Metal Industry Co., Ltd. | Japan | Conflict-free |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | Russia | Conflict-free |
| Gold | PAMP S.A. | Switzerland | Conflict-free |
| Gold | Pease & Curren | USA | Unknown |
| 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 | Planta Recuperadora de Metales SpA | Chile | Conflict-free |
| Gold | QG Refining, LLC | USA | Unknown |
| 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 | SAFINA A.S. | Czechia | Unknown |
| Gold | Sai Refinery | India | Unknown |
| Gold | Samduck Precious Metals | South Korea | Conflict-free |
| Gold | Samwon Metals Corp. | South Korea | 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 | Shenzhen Jiazhichun Technology Co., Ltd. | China | Unknown |
| Gold | Shenzhen Lianheshengxin Technology Co., Ltd. | China | Unknown |
| Gold | Shenzhen Ruijun Technology Co., Ltd. | China | Unknown |
| Gold | Sichuan Tianze Precious Metals Co., Ltd. | China | Conflict-free |
| Gold | Singway Technology Co., Ltd. | Taiwan, China | Conflict-free |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals | Russia | Conflict-free |
| Gold | Solar Applied Materials Technology Corp. | Taiwan, China | Conflict-free |
| Gold | State Research Institute Center for Physical Sciences and Technology | Lithuania | Unknown |
| Gold | Sumitomo Metal Mining Co., Ltd. | Japan | Conflict-free |
| Gold | SungEel HiMetal Co., Ltd. | South Korea | Conflict-free |
| Gold | Tanaka Denshi Kogyo K.K. | Japan | Conflict-free |
| Gold | Tanaka Kikinzoku Kogyo K.K. | Japan | Conflict-free |
| Gold | T.C.A S.p.A | Italy | Conflict-free |
| Gold | T-Chip Intelligent Technology Co., Ltd. | China | Unknown |
| Gold | The Great Wall Gold and Silver Refinery of China | China | Unknown |
| Gold | The Refinery of Shandong Gold Mining Co., Ltd. | China | Conflict-free |
| Gold | Tianjin Liwei Technology Co., Ltd. | China | Unknown |
| 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 | South Korea | 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 | Conflict-free |
| Gold | Yokohama Metal Co., Ltd. | Japan | Conflict-free |
| Gold | Yunnan Copper Industry Co., Ltd. | China | Conflict-free |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | China | Conflict-free |
| Tantalum | Asaka Riken Co., Ltd. | Japan | Conflict-free |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd. | China | Conflict-free |

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|----------|---|------------|---------------|
| Tantalum | D Block Metals, LLC | USA | Conflict-free |
| Tantalum | Douluoshan Sapphire Rare Metal Co Ltd | 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 |
| 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 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 | Jiangxi Dinghai Tantalum & Niobium Co., Ltd. | China | Conflict-free |
| Tantalum | Jiangxi King-Tan Tantalum Industry Ltd. | China | Unknown |
| Tantalum | Jiangxi Tuohong New Raw Material | China | Conflict-free |
| Tantalum | Jiujiang Janny New Material Co., Ltd. | China | Unknown |
| 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 | Jiujiang Janny New Material Co., Ltd. | China | Unknown |
| Tantalum | KEMET Blue Metals | Mexico | Conflict-free |
| Tantalum | KEMET Blue Powder | USA | Conflict-free |
| 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 | Ningxia Orient Tantalum Industry Co., Ltd. | China | Conflict-free |
| Tantalum | NPM Silmet AS | Estonia | Conflict-free |
| Tantalum | Power Resources Ltd. | Macedonia | Unknown |
| Tantalum | QuantumClean | USA | Conflict-free |
| Tantalum | Resind Industria e Comercio Ltda. | Brazil | 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 | Yanling Jincheng Tantalum & Niobium Co., Ltd. | China | Conflict-free |
| Tin | Alpha | USA | Conflict-free |
| Tin | Alpha Metals | China | Unknown |

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|-----|---|-----------|---------------|
| Tin | An Vinh Joint Stock Mineral Processing Company | Viet Nam | Unknown |
| Tin | ASUSTeK Computer Inc. | China | Unknown |
| Tin | Brand RBT | Indonesia | Unknown |
| Tin | Chengfeng Metals Co Pte Ltd | China | Conflict-free |
| 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 | 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 | Cookson | USA | Unknown |
| Tin | CV Ayi Jaya | Indonesia | Conflict-free |
| Tin | CV Dua Sekawan | Indonesia | Conflict-free |
| Tin | CV Gita Pesona | Indonesia | Conflict-free |
| Tin | CV Dua Sekawan | Indonesia | Conflict-free |
| Tin | CV Tiga Sekawan | Indonesia | Unknown |
| Tin | CV United Smelting | Indonesia | Conflict-free |
| Tin | CV Venus Inti Perkasa | Indonesia | Conflict-free |
| Tin | Dongguan CiEXPO Environmental Engineering Co., Ltd. | China | Unknown |
| Tin | Dowa | Japan | Conflict-free |
| Tin | Dowa Metaltech Co., Ltd. | Japan | Unknown |
| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | Viet Nam | Unknown |
| Tin | EM Vinto | Bolivia | Conflict-free |
| Tin | ENAF | Bolivia | Conflict-free |
| Tin | Estanho de Rondonia S.A. | Brazil | Unknown |
| Tin | Fenix Metals | Poland | Conflict-free |
| Tin | Gejiu City Datun Chengfeng Smelter | China | Unknown |
| Tin | Gejiu Fengming Metallurgy Chemical Plant | China | Conflict-free |
| Tin | Gejiu Jinye Mineral Company | China | Unknown |
| 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 | 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 Ketai Advanced Material Co., Ltd. | China | Unknown |
| Tin | Jiangxi New Nanshan Technology Ltd. | China | Conflict-free |
| Tin | Kai Unita Trade Limited Liability | China | Unknown |

| | Company | | |
|-----|--|-------------|---------------|
| Tin | Magnu's Minerais Metais e Ligas Ltda. | Brazil | Conflict-free |
| Tin | Malaysia Smelting Corporation (MSC) | Malaysia | Conflict-free |
| Tin | Ma'anshan Weitai Tin Co., Ltd. | China | Conflict-free |
| Tin | Melt Metais e Ligas S.A. | Brazil | 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 | Metallic Resources, Inc. | USA | Conflict-free |
| Tin | Mineracao Taboca S.A. | Brazil | Conflict-free |
| Tin | Mitsubishi Materials Corporation | Japan | Conflict-free |
| Tin | Minsur | Peru | Conflict-free |
| Tin | Modeltech Sdn Bhd | Malaysia | Unknown |
| Tin | Nankang Nanshan Tin Manufactory Co., Ltd. | China | Unknown |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company | Viet Nam | Unknown |
| Tin | OMSA | Bolivia | Conflict-free |
| Tin | O.M. Manufacturing Philippines, Inc. | Philippines | Conflict-free |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd. | Thailand | Conflict-free |
| Tin | Operaciones Metalurgical S.A. | Bolivia | Conflict-free |
| Tin | Pongpipat Company Limited | Myanmar | Unknown |
| 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 Babel Surya Alam Lestari | 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 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 |
| Tin | PT Prima Timah Utama | Indonesia | Conflict-free |
| Tin | PT Rajawali Rimba Perkasa | Indonesia | Conflict-free |
| Tin | PT Rajehan Ariq | 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 |

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| 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 Tirus Putra Mandiri | Indonesia | Conflict-free |
| Tin | PT Tommy Utama | Indonesia | Conflict-free |
| Tin | Resind Industria e Comercio Ltda. | Brazil | Conflict-free |
| Tin | Rui Da Hung | Taiwan, China | Conflict-free |
| Tin | Shenzhen Lianheshengxin Technology Co., Ltd. | China | Unknown |
| Tin | Shenzhen Master Wireless Technology Co., Ltd. | China | Unknown |
| Tin | Shenzhen Ruijun Technology Co., Ltd. | China | Unknown |
| Tin | Shenzhen Yongrui Motor Co., Ltd. | China | Unknown |
| Tin | Soft Metais Ltda. | Brazil | Conflict-free |
| Tin | Super Ligas | Brazil | Unknown |
| Tin | Super Micro Computer, Inc. | China | Unknown |
| Tin | T-Chip Intelligent Technology Co., Ltd. | China | Unknown |
| Tin | Thai Nguyen Mining and Metallurgy Co., Ltd. | Viet Nam | Conflict-free |
| Tin | Thailand Smelting & Refining Co Ltd | Thailand | Conflict-free |
| Tin | Thaisarco | Thailand | Conflict-free |
| Tin | Tianjin Liwei Technology Co., Ltd. | China | Unknown |
| Tin | Tin Technology & Refining | USA | Conflict-free |
| Tin | Tuyen Quang Non-Ferrous Metals Joint Stock Company | 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 | Yunnan Yunfan Non-ferrous Metals Co., Ltd. | China | Conflict-free |
| Tin | Yuntinic Resources | China | Unknown |
| Tungsten | A.L.M.T. Corp. | Japan | Conflict-free |
| Tungsten | A.L.M.T. TUNGSTEN Corp. | Japan | Unknown |
| Tungsten | ACL Metais Eireli | Brazil | Conflict-free |
| Tungsten | Asia Tungsten Products Vietnam Ltd. | Vietnam | Conflict-free |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd. | China | Conflict-free |
| Tungsten | China MuYe Tungsten Co., Ltd. | China | Unknown |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd. | China | Conflict-free |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd. | China | Conflict-free |
| Tungsten | Ganzhou Haichuang 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 | Global Tungsten & Powders Corp. | USA | Conflict-free |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd. | China | Conflict-free |
| Tungsten | Hunan Chenzhou Mining Co., Ltd. | China | Conflict-free |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., | China | Conflict-free |

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| | Ltd. Wuji | | |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd. | China | Conflict-free |
| Tungsten | Hunan Litian Tungsten Industry Co., Ltd. | China | Conflict-free |
| Tungsten | H.C. Starck Tungsten GmbH | Germany | Conflict-free |
| Tungsten | H.C. Starck Smelting GmbH & Co. KG | Germany | Conflict-free |
| Tungsten | Hydrometallurg, JSC | Russia | 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 Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | China | Conflict-free |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. | China | Unknown |
| Tungsten | Jiangxi Tungsten Co Ltd | China | Conflict-free |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd. | China | Conflict-free |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd. | China | Conflict-free |
| Tungsten | Kennametal Fallon | USA | Conflict-free |
| Tungsten | Kennametal Huntsville | USA | Conflict-free |
| Tungsten | KGETS Co., Ltd. | South Korea | Conflict-free |
| Tungsten | Lianyou Metals Co., Ltd. | Taiwan, China | Conflict-free |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd. | China | Conflict-free |
| Tungsten | Moliren Ltd. | Russia | Conflict-free |
| Tungsten | Masan Tungsten Chemical LLC (MTC) | Viet Nam | 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 | Unknown |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd. | Viet Nam | Conflict-free |
| Tungsten | Unecha Refractory metals plant | Russia | Conflict-free |
| Tungsten | Vietnam Youngsun Tungsten Industry Co., Ltd. | Viet Nam | Unknown |
| Tungsten | Wolfram Bergbau und Hutten AG | Austria | Conflict-free |
| Tungsten | Woltech Korea Co., Ltd. | South Korea | Conflict-free |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd. | China | Conflict-free |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd. | China | Conflict-free |
| Tungsten | Xiamen Tungsten Co., Ltd. | China | Conflict-free |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd. | China | Conflict-free |

Annex II

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|----------------------|---------------|
| Andorra | Angola |
| Austria | Australia |
| Belgium | Bolivia |
| Brazil | Canada |
| Chile | China |
| Czechia | Estonia |
| France | Germany |
| India | Indonesia |
| Italy | Japan |
| Kazakhstan | Kyrgyzstan |
| Lithuania | Macedonia |
| Malaysia | Mexico |
| Myanmar | Netherlands |
| New Zealand | Peru |
| Philippines | Poland |
| Russian Federation | Saudi Arabia |
| Singapore | South Korea |
| Spain | Sweden |
| Switzerland | Taiwan, China |
| Thailand | Turkey |
| United Arab Emirates | USA |
| Uzbekistan | Viet Nam |