

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

**FORM SD
SPECIALIZED DISCLOSURE REPORT**

KOHL'S CORPORATION

(Exact name of registrant as specified in its charter)

Wisconsin

001-11084

39-1630919

(State or other jurisdiction of
incorporation or organization)

(Commission
File Number)

(IRS Employer
Identification No.)

N56 W17000 Ridgewood Drive
Menomonee Falls, Wisconsin

53051

(Address of principal executive offices)

(Zip Code)

Jason J. Kelroy (SEVP, General Counsel & Corporate Secretary)

(262) 703-7000

(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, 2020

Section 1 - Conflict Minerals Disclosure
Item 1.01 Conflict Minerals Disclosure and Report

As provided for in Rule 13p-1 under the Securities Exchange Act of 1934, as amended, and Form SD, a Conflict Minerals Report is provided as an exhibit to this Form SD and is available at the following website: <https://investors.kohls.com/corporate-governance/governance-documents/default.aspx>.

The information contained on our website is not incorporated by reference into this Form SD or our Conflict Minerals Report and should not be considered part of this report or the Conflict Minerals Report.

Item 1.02 Exhibit

The Conflict Minerals Report described in Item 1.01 is filed as Exhibit 1.01 to this Form SD.

Section 2 - Exhibits

Item 2.01 Exhibits

Exhibit 1.01 - Conflict Minerals Report for the calendar year ended December 31, 2020.

SIGNATURES

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

Kohl's Corporation

/s/ Jason J. Kelroy

By: Jason J. Kelroy

Title: Senior Executive Vice President,
General Counsel & Corporate Secretary

May 26, 2021

Date

EXHIBIT INDEX

| Exhibit | Description |
|-----------------------------|--|
| <u>1.01</u> | Conflict Minerals Report for the calendar year ended December 31, 2020 |

Conflict Minerals Report

Kohl's Corporation has included this Conflict Minerals Report as an exhibit to its Form SD for calendar year 2020, as provided for in Rule 13p-1 under the Securities Exchange Act of 1934, as amended (collectively, the "Conflict Minerals Rule"). The date of filing of this Conflict Minerals Report is May 26, 2021.

Unless the context indicates otherwise, the terms "Kohl's," "we," "us" and "our" refer to Kohl's Corporation and its consolidated subsidiaries.

As used herein and consistent with the Conflict Minerals Rule, "Conflict Minerals" or "3TG" are columbite-tantalite (coltan), cassiterite, gold, wolframite and the derivatives tantalum, tin and tungsten, without regard to the location of origin of the minerals or derivative metals.

Forward-Looking Statements

This document contains "forward-looking statements" made within the meaning of the Private Securities Litigation Reform Act of 1995. Words such as "believes," "anticipates," "plans," "may," "intends," "will," "should," "expects" and similar expressions or the use of the future tense are intended to identify forward-looking statements. In addition, any statements that do not relate to historical or current facts or matters are forward-looking statements. Statements concerning current conditions may also be forward-looking if they imply a continuation of current conditions. Examples of forward-looking statements within this document include, but are not limited to, statements concerning the additional steps that we intend to take to mitigate the risk that our necessary 3TG benefit armed groups.

Forward-looking statements are subject to risks and uncertainties that could cause actual actions or performance to differ materially from those expressed in the forward-looking statements. These risks and uncertainties include, but are not limited to: (1) the continued implementation of satisfactory traceability and other compliance measures by our direct and indirect suppliers on a timely basis or at all; (2) whether smelters and refiners and other market participants responsibly source 3TG; and (3) political and regulatory developments, whether in the Democratic Republic of the Congo ("DRC") or an adjoining country (collectively, the "Covered Countries"), the United States or elsewhere. You are cautioned not to place undue reliance on these forward-looking statements, which speak only as of the date of the filing of this document. We do not intend, and undertake no obligation, to publish revised forward-looking statements to reflect events or circumstances after the date of the filing of this document or to reflect the occurrence of unanticipated events.

Applicability of the Conflict Minerals Rule to Our Company

Kohl's is a leading omnichannel retailer. As of January 30, 2021, we operated 1,162 Kohl's department stores, a website (www.kohls.com) and 12 FILA outlets. Our Kohl's stores and website sell moderately-priced private and national brand apparel, footwear, accessories, beauty, and home products. Our Kohl's stores generally carry a consistent merchandise assortment with some differences attributable to local preferences. Our website includes merchandise that is available in our stores, as well as merchandise that is available only online. Many of the products that we sell are third-party, national brand products that are available from many retailers, including Kohl's, and therefore not in-scope for purposes of our Conflict Minerals Rule compliance. Our private portfolio includes well-known established brands such as Apt. 9, Croft & Barrow, Jumping Beans, SO, and Sonoma Goods for Life, and exclusive brands that are developed and marketed through agreements with nationally-recognized brands such as Food Network, LC Lauren Conrad, and Simply Vera Vera Wang.

We believe that we are subject to the Conflict Minerals Rule because of the degree of influence that we exercise over some of the materials, parts or components of some of the private portfolio products that are manufactured for us and that contain necessary 3TG. However, for some of our private portfolio products, we

exercise no influence over the materials, parts or components of the products. Our involvement with those products is limited to having the manufacturer affix our portfolio brand name to the products. Those products and the related suppliers are therefore not in-scope for purposes of our compliance with the Conflict Minerals Rule. We do not manufacture any products.

We do not directly source 3TG from mines, smelters or refiners and believe that we are many levels removed from these market participants. However, through the efforts described below, we seek to ensure that our private portfolio suppliers' sourcing practices are consistent with our Conflict Minerals Policy described below.

For 2020, notwithstanding our due diligence efforts discussed herein, we were unable to determine the origin of at least a portion of the necessary 3TG in each of the products that we contracted to manufacture. However, none of the necessary 3TG contained in our in-scope products were determined by us to directly or indirectly finance or benefit armed groups in a Covered Country. We did not conclude that any of our products were "DRC conflict free." The terms "armed group" and "DRC conflict free" have the meanings contained in the Conflict Minerals Rule.

Our Conflict Minerals Policy

We are committed to sourcing products from companies that share our values around human rights, ethics and environmental responsibility. To this end, we have adopted a company policy for the 3TG that are in our supply chain ("Conflict Minerals Policy"). The Conflict Minerals Policy includes, but is not limited to, our expectations that our suppliers:

1. Adopt and maintain a policy to reasonably assure that the 3TG in the products supplied to Kohl's are conflict free.
2. Establish their own due diligence programs to ensure conflict-free supply chains and take any other steps necessary to abide by the contractual certifications, warranties, covenants and representations provided to Kohl's. Supplier due diligence programs are expected to be designed in conformity with the Organisation for Economic Co-operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
3. Cooperate with our 3TG due diligence process, including by providing us, from time to time, with written certifications and other information concerning the origin of 3TG included in products supplied to Kohl's. As part of our process, suppliers of Kohl's proprietary-brand products will be expected to complete the Responsible Minerals Initiative's (the "RMI") Conflict Minerals Reporting Template ("CMRT").
4. Support industry efforts to enhance traceability and responsible practices in global mineral supply chains.

Under our Conflict Minerals Policy, we reserve the right to require from any supplier at any time such additional information, certifications and documentation as we deem necessary to monitor or assess compliance with the Conflict Minerals Policy or other contractual certifications, warranties, covenants and representations provided to us.

We do not seek to embargo the Covered Countries and encourage our suppliers to continue to source responsibly from the Covered Countries.

Reasonable Country of Origin Inquiry Information

As required by the Conflict Minerals Rule, for 2020, we conducted a “reasonable country of origin inquiry” (“RCOI”). For our RCOI, to the extent applicable, we utilized the same processes and procedures as for our due diligence, in particular Steps 1 and 2 of the design framework contemplated in the Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including the Supplement on Tin, Tantalum and Tungsten and the Supplement on Gold (Third Edition) (the “OECD Guidance”). The OECD Guidance is described below in this Conflict Minerals Report. The specific goal of our RCOI was to determine whether the 3TG in our in-scope products originated in a Covered Country.

Inquiries were made of all suppliers that provided Kohl’s with private portfolio products during 2020, regardless of whether the degree of influence we actually exercised over the materials, parts or components of the products brought them in-scope for purposes of our compliance with the Conflict Minerals Rule. We refer below to our suppliers of private portfolio products for 2020 as “Suppliers.” For 2020, we reached out to 374 Suppliers.

The Suppliers identified to us 328 different smelters and refiners as potentially having processed the necessary 3TG contained in our potentially in-scope products. 232 of the smelters and refiners were listed as Conformant (as defined herein) by the RMI. Based on our RCOI, we concluded that 120 of these 328 smelters and refiners sourced entirely from outside of the Covered Countries. Our conclusion was based on information made available by the RMI to its members.

Based on the results of our RCOI, we conducted due diligence for 2020. These due diligence efforts are discussed below.

We use a third-party service provider (the “Service Provider”) to assist us with the collection, review, validation and analysis of the information received from the Suppliers. Some of the compliance activities described in this Conflict Minerals Report were performed by the Service Provider on our behalf.

Due Diligence Measures

Design Framework

We designed our due diligence measures relating to 3TG to conform with, in all material respects, the criteria set forth in the OECD Guidance.

Selected Elements of Design Framework and Due Diligence Program

The OECD Guidance established a five-step framework for due diligence as a basis for responsible global supply chain management of minerals from conflict-affected and high-risk areas. Selected elements of our due diligence program are discussed below. However, these are not all of the elements of the program that we have put in place to help ensure that the 3TG contained in our products are responsibly sourced. The headings below conform to the headings used in the OECD Guidance for each of the five steps.

1. *OECD Guidance Step One: “Establish strong company management systems”*
 - a. We have a Conflict Minerals Policy. The Conflict Minerals Policy is posted on our website at <https://corporate.kohls.com/content/dam/kohlscorp/investors/corporate-governance/ConflictMineralsPolicyMay2014.pdf>. The information contained on our website is not incorporated by reference into this Conflict Minerals Report or the Form SD and should not be considered part of this Conflict Minerals Report or the Form SD. The Conflict Minerals Policy is summarized earlier in this Conflict Minerals Report.

- b. We have a working group led by our Legal team at the direction of our Senior Executive Vice President, General Counsel. Some of the functional areas participating in the working group include Legal, Product Development and Social Compliance. We also include merchants and sourcing personnel in the compliance process. We supplement our compliance efforts with specialist outside counsel and the Service Provider.
- c. We communicate to our relevant merchants and other selected internal personnel our commitment to compliance with the Conflict Minerals Rule. We do so by email, telephone and in-person meetings. In addition, our senior leadership, selected Product Development team members, merchants and selected other internal personnel are educated and briefed on the Conflict Minerals Rule and our compliance plan.
- d. Kohl's Terms of Engagement and our Merchandise Purchase Order Terms & Conditions, pursuant to which Kohl's purchases products, contain terms to clarify our 3TG compliance expectations and drive compliance, including a provision requiring all suppliers to certify, warrant, covenant and represent that all merchandise sold to Kohl's will be free of any 3TG financing conflict in a Covered Country.
- e. Through the Service Provider, we use the CMRT developed by the RMI to identify smelters and refiners in our supply chain.
- f. Records of due diligence processes, findings and resulting decisions and any other business records relating to 3TG due diligence are retained for at least five years. These records are retained on our behalf by the Service Provider and are generally stored in an electronic format.
- g. We have mechanisms for employees, suppliers and other interested parties to report potential violations of our Conflict Minerals Policy, including email and telephone hotline reporting mechanisms. The email address is Factory.Compliance@Kohls.com and the hotline number is (800) 837-7297.

2. OECD Guidance Step Two: "Identify and assess risk in the supply chain"

- a. For 2020, the Service Provider requested by email that the Suppliers provide us with information, through the completion of a CMRT, concerning the usage and source of 3TG in their products, as well as information concerning the Suppliers' related compliance measures. Both we and the Service Provider followed up multiple times, if required, by email or phone with Suppliers that did not respond to the request within the specified time frame.
- b. Through the Service Provider, compliance training and other compliance resources were made available to the Suppliers. The training program was intended to help ensure the quality and completeness of the CMRTs received from the Suppliers. An email also was sent to Suppliers that described our compliance program requirements and included a link to the Service Provider's on-line supplier education portal and contact email addresses and telephone numbers for obtaining answers to questions and/or guidance on completing our survey request.
- c. The Service Provider reviewed the responses received from Suppliers for plausibility, consistency and gaps. It follows up by email or phone with Suppliers that submitted a response that triggered any one of seven specified quality control flags. Responses were received from 97% of the Suppliers.

- d. Smelter and refiner information provided by Suppliers was reviewed against the Service Provider's internal database. To the extent not in that database, it requests that the supplier confirm that the listed entity is a smelter or refiner.
- e. Smelter and refiner information also was reviewed by the Service Provider against the lists of Conformant and Active (as defined herein), or the equivalent, smelters and refiners published by the RMI, the London Bullion Market Association ("LBMA") and the Responsible Jewellery Council ("RJC").
- f. To the extent that a smelter or refiner identified by a supplier is not listed as Conformant or the equivalent by an independent third-party, the Service Provider attempts to contact the smelter or refiner to gain more information about its sourcing practices, including countries of origin and transfer and whether there are internal due diligence procedures in place or other processes that the smelter or refiner takes to track the chain of custody on the source of its 3TG. Internet research is also performed to determine whether there are any outside sources of information regarding the smelter's or refiner's sourcing practices. For 2020, of the 328 smelters and refiners identified by Suppliers as having potentially supplied 3TG contained in our in-scope products, 232 were listed as Conformant by the RMI as of April 30, 2021.
- g. If a supplier is unable to provide a CMRT, the Service Provider requests information on the suppliers' Tier 2 suppliers. The Tier 2 suppliers, and subsequent tiers of suppliers as identified to the Service Provider, are then contacted by the Service Provider following the procedures described above.
- h. Based on the information furnished by our suppliers, the Service Provider and other information known to us, we assess the risks of adverse impacts.

3. *OECD Guidance Step Three: "Design and implement a strategy to respond to identified risks"*

- a. Our Senior Executive Vice President, General Counsel charged with managing our 3TG compliance strategy periodically reports the findings of our supply chain risk assessment to other members of our senior leadership and to our Board of Directors or its Audit Committee.
- b. We address identified risks on a case-by-case basis. This flexible approach enables us to tailor the response to the risks identified.
- c. In addition, to the extent that identified smelters and refiners are not listed as Conformant, we seek to exercise leverage over these smelters and refiners to become Conformant through our participation in and support of the RMI. In addition, we also utilize information provided by the RMI to its members to monitor smelter and refiner improvement.

4. *OECD Guidance Step Four: "Carry out independent third-party audit of supply chain due diligence at identified points in the supply chain"*

- a. In connection with our due diligence, we utilize and rely on information made available by the RMI concerning independent third-party audits of smelters and refiners to assess smelter and refiner due diligence and to determine whether the smelter or refiner is Conformant.
- b. We also support independent third-party audits by being a member of the RMI.

5. *OECD Guidance Step 5: “Report on supply chain due diligence”*

- a. We file a Form SD and a Conflict Minerals Report with the Securities and Exchange Commission, and make available on our website information from the Form SD and the Conflict Minerals Report.
- b. We include information concerning 3TG compliance in our Corporate Social Responsibility Report, which we make publicly available on our website.

Product and Smelter and Refiner Information

In-Scope Products

See “Applicability of the Conflict Minerals Rule to Our Company” for further information concerning our potentially in-scope products. For a further discussion of our products generally, see our Annual Report on Form 10-K for the fiscal year ended January 30, 2021. The information contained in our Form 10-K is not incorporated by reference into this Conflict Minerals Report or our Form SD and should not be considered part of this Conflict Minerals Report or our Form SD.

Identified Smelters and Refiners

The following table summarizes the smelter and refiner information provided by the Suppliers. See Annex A for a list of identified smelters and refiners and country of origin information. Annex A also contains additional information relating to the data presented in the table. The number of smelters and refiners reflected in the table exceeds the number of unique Conformant smelters and refiners reported because some smelters and refiners processed more than one 3TG mineral.

| | Conformant | Active | Smelter Look-Up Tab List Only |
|----------|------------|--------|-------------------------------|
| Tantalum | 37 | 0 | 4 |
| Tin | 52 | 7 | 28 |
| Tungsten | 41 | 1 | 6 |
| Gold | 103 | 2 | 55 |

We endeavored to determine the mine or location of origin of the necessary 3TG contained in our in-scope products by requesting that the Suppliers provide us with a completed CMRT and through the other procedures followed by us and the Service Provider that are described in this Conflict Minerals Report.

None of the necessary 3TG contained in our in-scope products were determined by us to directly or indirectly finance or benefit armed groups in the Covered Countries. However, we did not have sufficient information to determine whether or not any of our products were “DRC conflict free.” The terms “armed group” and “DRC conflict free” have the meanings contained in the Conflict Minerals Rule.

Due to our position in the supply chain, which is discussed earlier in this Conflict Minerals Report, we rely on our suppliers for accurate smelter and refiner information and our RCOI and due diligence measures do not provide absolute certainty regarding the source and chain of custody of the necessary 3TG contained in our in-scope products.

Future Risk Mitigation Efforts

We intend to take the following additional steps for 2021, either directly or through the Service Provider, to mitigate the risk that the necessary 3TG in our in-scope products benefit armed groups:

1. Continue to encourage Suppliers that provided company level information for 2020 to provide product level information for 2021;
2. Continue to engage with Suppliers that provided incomplete responses or that did not provide responses for 2020 to help ensure that they provide requested information for 2021; and
3. Continue to communicate to new in-scope supplier our sourcing expectations, including through the dissemination of the Conflict Minerals Policy to them.

All of the foregoing steps are in addition to the other steps that we took in respect of 2020, which we intend to continue to take in respect of 2021, to the extent applicable.

Annex A

Capitalized terms used and not otherwise defined in this Annex have the meanings set forth in the Conflict Minerals Report of which this Annex is a part.

Smelters and Refiners

In connection with our reasonable country of origin inquiry or due diligence, as applicable, the Suppliers identified to us the smelters and refiners listed below as having potentially processed the necessary 3TG contained in our in-scope products in 2020. Please see the notes that accompany the table for additional information concerning the data in the table.

| Mineral | Smelter or Refiner Name | SOR Location | Status |
|---------|---|----------------------|-------------------------------|
| Gold | 8853 S.p.A. | Italy | Conformant |
| Gold | Abington Reldan Metals, LLC | United States | Smelter Look-Up List Tab Only |
| Gold | Advanced Chemical Company | United States | Conformant |
| Gold | African Gold Refinery | Uganda | Smelter Look-Up List Tab Only |
| Gold | Aida Chemical Industries Co., Ltd. | Japan | Conformant |
| Gold | Al Etihad Gold Refinery DMCC | United Arab Emirates | Conformant |
| Gold | Allgemeine Gold-und Silberscheideanstalt A.G. | Germany | Conformant |
| Gold | Almalyk Mining and Metallurgical Complex (AMMC) | Uzbekistan | Conformant |
| Gold | AngloGold Ashanti Corrego do Sitio Mineracao | Brazil | Conformant |
| Gold | Argor-Heraeus S.A. | Switzerland | Conformant |
| Gold | Asahi Pretec Corp. | Japan | Conformant |
| Gold | Asahi Refining Canada Ltd. | Canada | Conformant |
| Gold | Asahi Refining USA Inc. | United States | Conformant |
| Gold | Asaka Riken Co., Ltd. | Japan | Conformant |
| Gold | Atasay Kuyumculuk Sanayi Ve Ticaret A.S. | Turkey | Smelter Look-Up List Tab Only |
| Gold | AU Traders and Refiners | South Africa | Conformant |
| Gold | Aurubis AG | Germany | Conformant |
| Gold | Bangalore Refinery | India | Conformant |
| Gold | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | Philippines | Conformant |
| Gold | Boliden AB | Sweden | Conformant |
| Gold | C. Hafner GmbH + Co. KG | Germany | Conformant |
| Gold | Caridad | Mexico | Smelter Look-Up List Tab Only |
| Gold | CCR Refinery - Glencore Canada Corporation | Canada | Conformant |
| Gold | Cendres + Metaux S.A. | Switzerland | Conformant |
| Gold | CGR Metalloys Pvt Ltd. | India | Smelter Look-Up List Tab Only |
| Gold | Chimet S.p.A. | Italy | Conformant |
| Gold | Chugai Mining | Japan | Conformant |
| Gold | Daejin Indus Co., Ltd. | Korea, Republic of | Smelter Look-Up List Tab Only |
| Gold | Daye Non-Ferrous Metals Mining Ltd. | China | Smelter Look-Up List Tab Only |
| Gold | Degussa Sonne / Mond Goldhandel GmbH | Germany | Smelter Look-Up List Tab Only |
| Gold | Dijllah Gold Refinery FZC | United Arab Emirates | Smelter Look-Up List Tab Only |

| | | | |
|------|---|----------------------|-------------------------------|
| Gold | DODUCO Contacts and Refining GmbH | Germany | Conformant |
| Gold | Dowa | Japan | Conformant |
| Gold | DS PRETECH Co., Ltd. | Korea, Republic of | Conformant |
| Gold | DSC (Do Sung Corporation) | Korea, Republic of | Conformant |
| Gold | Eco-System Recycling Co., Ltd. East Plant | Japan | Conformant |
| Gold | Emirates Gold DMCC | United Arab Emirates | Conformant |
| Gold | Fidelity Printers and Refiners Ltd. | Zimbabwe | Smelter Look-Up List Tab Only |
| Gold | Fujairah Gold FZC | United Arab Emirates | Smelter Look-Up List Tab Only |
| Gold | GCC Gujrat Gold Centre Pvt. Ltd. | India | Smelter Look-Up List Tab Only |
| Gold | Geib Refining Corporation | United States | Conformant |
| Gold | Gold Refinery of Zijin Mining Group Co., Ltd. | China | Conformant |
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM | China | Smelter Look-Up List Tab Only |
| Gold | Guangdong Jinding Gold Limited | China | Smelter Look-Up List Tab Only |
| Gold | Guoda Safina High-Tech Environmental Refinery Co., Ltd. | China | Smelter Look-Up List Tab Only |
| Gold | Hangzhou Fuchunjiang Smelting Co., Ltd. | China | Smelter Look-Up List Tab Only |
| Gold | Heimerle + Meule GmbH. | Germany | Conformant |
| Gold | Heraeus Metals Hong Kong Ltd. | China | Conformant |
| Gold | Heraeus Precious Metals GmbH & Co. KG | Germany | Active |
| Gold | HONGYANG SURFACE TREATMENT CO. LTD | China | Smelter Look-Up List Tab Only |
| Gold | Hunan Chenzhou Mining Co., Ltd. | China | Smelter Look-Up List Tab Only |
| Gold | Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd. | China | Smelter Look-Up List Tab Only |
| Gold | HwaSeong CJ CO., LTD. | Korea, Republic of | Smelter Look-Up List Tab Only |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | China | Conformant |
| Gold | International Precious Metal Refiners | United Arab Emirates | Active |
| Gold | Ishifuku Metal Industry Co., Ltd. | Japan | Conformant |
| Gold | Istanbul Gold Refinery | Turkey | Conformant |
| Gold | Italpreziosi | Italy | Conformant |
| Gold | Japan Mint | Japan | Conformant |
| Gold | Jiangxi Copper Co., Ltd. | China | Conformant |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant | Russian Federation | Smelter Look-Up List Tab Only |
| Gold | JSC Uralelectromed | Russian Federation | Conformant |
| Gold | JX Nippon Mining & Metals Co., Ltd. | Japan | Conformant |
| Gold | Kaloti Precious Metals | United Arab Emirates | Smelter Look-Up List Tab Only |
| Gold | Kazakhmys Smelting LLC | Kazakhstan | Smelter Look-Up List Tab Only |
| Gold | Kazzinc | Kazakhstan | Conformant |
| Gold | Kennecott Utah Copper LLC | United States | Conformant |
| Gold | KGHM Polska Miedz Spolka Akcyjna | Poland | Conformant |
| Gold | Kojima Chemicals Co., Ltd. | Japan | Conformant |
| Gold | Korea Zinc Co., Ltd. | Korea, Republic of | Conformant |
| Gold | Kyrgyzaltyn JSC | Kyrgyzstan | Conformant |
| | | | |

| | | | |
|------|---|--------------------|-------------------------------|
| Gold | Kyshtym Copper-Electrolytic Plant ZAO | Russian Federation | Smelter Look-Up List Tab Only |
| Gold | L'azurde Company For Jewelry | Saudi Arabia | Smelter Look-Up List Tab Only |
| Gold | Lingbao Gold Co., Ltd. | China | Smelter Look-Up List Tab Only |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd. | China | Smelter Look-Up List Tab Only |
| Gold | L'Orfebre S.A. | Andorra | Conformant |
| Gold | LS-NIKKO Copper Inc. | Korea, Republic of | Conformant |
| Gold | LT Metal Ltd. | Korea, Republic of | Conformant |
| Gold | Luoyang Zijin Yinhui Gold Refinery Co., Ltd. | China | Smelter Look-Up List Tab Only |
| Gold | Marsam Metals | Brazil | Conformant |
| Gold | Materion | United States | Conformant |
| Gold | Matsuda Sangyo Co., Ltd. | Japan | Conformant |
| Gold | Metalor Technologies (Hong Kong) Ltd. | China | Conformant |
| Gold | Metalor Technologies (Singapore) Pte., Ltd. | Singapore | Conformant |
| Gold | Metalor Technologies (Suzhou) Ltd. | China | Conformant |
| Gold | Metalor Technologies S.A. | Switzerland | Conformant |
| Gold | Metalor USA Refining Corporation | United States | Conformant |
| Gold | Metalurgica Met-Mex Penoles S.A. De C.V. | Mexico | Conformant |
| Gold | Mitsubishi Materials Corporation | Japan | Conformant |
| Gold | Mitsui Mining and Smelting Co., Ltd. | Japan | Conformant |
| Gold | MMTC-PAMP India Pvt., Ltd. | India | Conformant |
| Gold | Modeltech Sdn Bhd | Malaysia | Smelter Look-Up List Tab Only |
| Gold | Morris and Watson | New Zealand | Smelter Look-Up List Tab Only |
| Gold | Morris and Watson Gold Coast | Australia | Smelter Look-Up List Tab Only |
| Gold | Moscow Special Alloys Processing Plant | Russian Federation | Conformant |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.S. | Turkey | Conformant |
| Gold | Namiwa Kin-Eki Co | Japan | Smelter Look-Up List Tab Only |
| Gold | Navoi Mining and Metallurgical Combinat | Uzbekistan | Conformant |
| Gold | NH Recytech Company | Korea, Republic of | Smelter Look-Up List Tab Only |
| Gold | Nihon Material Co., Ltd. | Japan | Conformant |
| Gold | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH | Austria | Conformant |
| Gold | Ohura Precious Metal Industry Co., Ltd. | Japan | Conformant |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | Russian Federation | Conformant |
| Gold | OJSC Novosibirsk Refinery | Russian Federation | Conformant |
| Gold | PAMP S.A. | Switzerland | Conformant |
| Gold | Pease & Curren | United States | Smelter Look-Up List Tab Only |
| Gold | Penglai Penggang Gold Industry Co., Ltd. | China | Smelter Look-Up List Tab Only |
| Gold | Planta Recuperadora de Metales SpA | Chile | Conformant |
| Gold | Prioksky Plant of Non-Ferrous Metals | Russian Federation | Conformant |
| Gold | PT Aneka Tambang (Persero) Tbk | Indonesia | Conformant |
| Gold | PX Precinox S.A. | Switzerland | Conformant |
| | | | |

| | | | |
|------|--|--------------------|-------------------------------|
| Gold | QG Refining, LLC | United States | Smelter Look-Up List Tab Only |
| Gold | Rand Refinery (Pty) Ltd. | South Africa | Conformant |
| Gold | Refinery of Seemine Gold Co., Ltd. | China | Smelter Look-Up List Tab Only |
| Gold | REMONDIS PMR B.V. | Netherlands | Conformant |
| Gold | Royal Canadian Mint | Canada | Conformant |
| Gold | SAAMP | France | Conformant |
| Gold | Sabin Metal Corp. | United States | Smelter Look-Up List Tab Only |
| Gold | Safimet S.p.A | Italy | Conformant |
| Gold | SAFINA A.S. | Czech Republic | Conformant |
| Gold | Sai Refinery | India | Smelter Look-Up List Tab Only |
| Gold | Samduck Precious Metals | Korea, Republic of | Conformant |
| Gold | SAMWON METALS Corp. | Korea, Republic of | Smelter Look-Up List Tab Only |
| Gold | SANMENXIA CHAOYANG TECHNOLOGY CO.,LTD | China | Smelter Look-Up List Tab Only |
| Gold | SAXONIA Edelmetalle GmbH | Germany | Conformant |
| Gold | SEMPSA Joyeria Plateria S.A. | Spain | Conformant |
| Gold | Shandong Humon Smelting Co., Ltd. | China | Smelter Look-Up List Tab Only |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | China | Smelter Look-Up List Tab Only |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd. | China | Conformant |
| Gold | Sichuan Tianze Precious Metals Co., Ltd. | China | Conformant |
| Gold | Singway Technology Co., Ltd. | Taiwan | Conformant |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals | Russian Federation | Conformant |
| Gold | Solar Applied Materials Technology Corp. | Taiwan | Conformant |
| Gold | Sovereign Metals | India | Smelter Look-Up List Tab Only |
| Gold | State Research Institute Center for Physical Sciences and Technology | Lithuania | Smelter Look-Up List Tab Only |
| Gold | Sudan Gold Refinery | Sudan | Smelter Look-Up List Tab Only |
| Gold | Sumitomo Metal Mining Co., Ltd. | Japan | Conformant |
| Gold | SungEel HiMetal Co., Ltd. | Korea, Republic of | Conformant |
| Gold | T.C.A S.p.A | Italy | Smelter Look-Up List Tab Only |
| Gold | Tanaka Kikinzoku Kogyo K.K. | Japan | Conformant |
| Gold | The Refinery of Shandong Gold Mining Co., Ltd. | China | Conformant |
| Gold | Tianjin Jingruida Flatware Co.,LTD | China | Smelter Look-Up List Tab Only |
| Gold | Tokuriki Honten Co., Ltd. | Japan | Conformant |
| Gold | Tongling Nonferrous Metals Group Co., Ltd. | China | Smelter Look-Up List Tab Only |
| Gold | Tony Goetz NV | Belgium | Smelter Look-Up List Tab Only |
| Gold | TOO Tau-Ken-Altyn | Kazakhstan | Conformant |
| Gold | Torecom | Korea, Republic of | Conformant |
| Gold | Umicore Brasil Ltda. | Brazil | Smelter Look-Up List Tab Only |
| Gold | UMICORE GAHANOTECHNIK GmbH. | Germany | Smelter Look-Up List Tab Only |
| Gold | Umicore Precious Metals Thailand | Thailand | Conformant |
| Gold | Umicore S.A. Business Unit Precious Metals | Belgium | Conformant |

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| | Refining | | |
| Gold | United Precious Metal Refining, Inc. | United States | Conformant |
| Gold | Universal Precious Metals Refining Zambia | Zambia | Smelter Look-Up List Tab Only |
| Gold | Valcambi S.A. | Switzerland | Conformant |
| Gold | Western Australian Mint (T/a The Perth Mint) | Australia | Conformant |
| Gold | WIELAND Edelmetalle GmbH | Germany | Smelter Look-Up List Tab Only |
| Gold | Yamakin Co., Ltd. | Japan | Conformant |
| Gold | Yokohama Metal Co., Ltd. | Japan | Conformant |
| Gold | Yunnan Copper Industry Co., Ltd. | China | Smelter Look-Up List Tab Only |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | China | Conformant |
| Tantalum | Asaka Riken Co., Ltd. | Japan | Conformant |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd. | China | Conformant |
| Tantalum | CP Metals Inc. | United States | Smelter Look-Up List Tab Only |
| Tantalum | D Block Metals, LLC | United States | Conformant |
| Tantalum | Exotech Inc. | United States | Conformant |
| Tantalum | F&X Electro-Materials Ltd. | China | Conformant |
| Tantalum | FIR Metals & Resource Ltd. | China | Conformant |
| Tantalum | Global Advanced Metals Aizu | Japan | Conformant |
| Tantalum | Global Advanced Metals Boyertown | United States | Conformant |
| Tantalum | Guangdong Rising Rare Metals-EO Materials Ltd. | China | Conformant |
| Tantalum | Guangdong Zhiyuan New Material Co., Ltd. | China | Smelter Look-Up List Tab Only |
| Tantalum | H.C. Starck Hermsdorf GmbH | Germany | Conformant |
| Tantalum | H.C. Starck Inc. | United States | Conformant |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd. | China | Conformant |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd. | China | Conformant |
| Tantalum | Jiangxi Tuohong New Raw Material | China | Conformant |
| Tantalum | Jiujiang Janny New Material Co., Ltd. | China | Smelter Look-Up List Tab Only |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd. | China | Conformant |
| Tantalum | Jiujiang Tanbre Co., Ltd. | China | Conformant |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd. | China | Conformant |
| Tantalum | KEMET Blue Metals | Mexico | Conformant |
| Tantalum | Kemet Blue Powder | United States | Smelter Look-Up List Tab Only |
| Tantalum | LSM Brasil S.A. | Brazil | Conformant |
| Tantalum | Meta Materials | Macedonia, The Former Yugoslav Republic Of | Conformant |
| Tantalum | Metallurgical Products India Pvt., Ltd. | India | Conformant |
| Tantalum | Mineracao Taboca S.A. | Brazil | Conformant |
| Tantalum | Mitsui Mining and Smelting Co., Ltd. | Japan | Conformant |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd. | China | Conformant |
| Tantalum | NPM Silmet AS | Estonia | Conformant |
| Tantalum | QuantumClean | United States | Conformant |
| Tantalum | Resind Industria e Comercio Ltda. | Brazil | Conformant |

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| Tantalum | Solikamsk Magnesium Works OAO | Russian Federation | Conformant |
| Tantalum | Taki Chemical Co., Ltd. | Japan | Conformant |
| Tantalum | TANIOBIS Co., Ltd. | Thailand | Conformant |
| Tantalum | TANIOBIS GmbH | Germany | Conformant |
| Tantalum | TANIOBIS Japan Co., Ltd. | Japan | Conformant |
| Tantalum | TANIOBIS Smelting GmbH & Co. KG | Germany | Conformant |
| Tantalum | Telex Metals | United States | Conformant |
| Tantalum | Ulba Metallurgical Plant JSC | Kazakhstan | Conformant |
| Tantalum | XinXing Haorong Electronic Material Co., Ltd. | China | Conformant |
| Tantalum | Yanling Jincheng Tantalum & Niobium Co., Ltd. | China | Conformant |
| Tin | Alpha | United States | Conformant |
| Tin | An Vinh Joint Stock Mineral Processing Company | Viet Nam | Smelter Look-Up List Tab Only |
| Tin | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | China | Conformant |
| Tin | Chifeng Dajingzi Tin Industry Co., Ltd. | China | Conformant |
| Tin | China Tin Group Co., Ltd. | China | Conformant |
| Tin | CV Ayi Jaya | Indonesia | Active |
| Tin | CV Dua Sekawan | Indonesia | Smelter Look-Up List Tab Only |
| Tin | CV Gita Pesona | Indonesia | Smelter Look-Up List Tab Only |
| Tin | CV United Smelting | Indonesia | Smelter Look-Up List Tab Only |
| Tin | CV Venus Inti Perkasa | Indonesia | Active |
| Tin | Dongguan CiEXPO Environmental Engineering Co., Ltd. | China | Smelter Look-Up List Tab Only |
| Tin | Dowa | Japan | Conformant |
| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | Viet Nam | Smelter Look-Up List Tab Only |
| Tin | EM Vinto | Bolivia | Conformant |
| Tin | Estanho de Rondonia S.A. | Brazil | Active |
| Tin | Fenix Metals | Poland | Conformant |
| Tin | Gejiu City Fuxiang Industry and Trade Co., Ltd. | China | Smelter Look-Up List Tab Only |
| Tin | Gejiu Fengming Metallurgy Chemical Plant | China | Conformant |
| Tin | Gejiu Kai Meng Industry and Trade LLC | China | Conformant |
| Tin | Gejiu Non-Ferrous Metal Processing Co., Ltd. | China | Conformant |
| Tin | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | China | Conformant |
| Tin | Gejiu Zili Mining And Metallurgy Co., Ltd. | China | Conformant |
| Tin | Guangdong Hanhe Non-Ferrous Metal Co., Ltd. | China | Conformant |
| Tin | Guanyang Guida Nonferrous Metal Smelting Plant | China | Conformant |
| Tin | HuiChang Hill Tin Industry Co., Ltd. | China | Conformant |
| Tin | Huichang Jinshunda Tin Co., Ltd. | China | Conformant |
| Tin | Jiangxi New Nanshan Technology Ltd. | China | Conformant |
| Tin | Ma'anshan Weitai Tin Co., Ltd. | China | Conformant |
| Tin | Magnu's Minerai's Metais e Ligas Ltda. | Brazil | Conformant |
| Tin | Malaysia Smelting Corporation (MSC) | Malaysia | Conformant |
| Tin | Melt Metais e Ligas S.A. | Brazil | Conformant |

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| Tin | Metallic Resources, Inc. | United States | Conformant |
| Tin | Metallo Belgium N.V. | Belgium | Conformant |
| Tin | Metallo Spain S.L.U. | Spain | Conformant |
| Tin | Mineracao Taboca S.A. | Brazil | Conformant |
| Tin | Minsur | Peru | Conformant |
| Tin | Mitsubishi Materials Corporation | Japan | Conformant |
| Tin | Modeltech Sdn Bhd | Malaysia | Smelter Look-Up List Tab Only |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company | Viet Nam | Smelter Look-Up List Tab Only |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd. | Thailand | Conformant |
| Tin | O.M. Manufacturing Philippines, Inc. | Philippines | Conformant |
| Tin | Operaciones Metalurgicas S.A. | Bolivia | Conformant |
| Tin | Pongpipat Company Limited | Myanmar | Smelter Look-Up List Tab Only |
| Tin | PT Aries Kencana Sejahtera | Indonesia | Active |
| Tin | PT Artha Cipta Langgeng | Indonesia | Conformant |
| Tin | PT ATD Makmur Mandiri Jaya | Indonesia | Conformant |
| Tin | PT Babel Inti Perkasa | Indonesia | Smelter Look-Up List Tab Only |
| Tin | PT Babel Surya Alam Lestari | Indonesia | Conformant |
| Tin | PT Bangka Prima Tin | Indonesia | Smelter Look-Up List Tab Only |
| Tin | PT Bangka Tin Industry | Indonesia | Smelter Look-Up List Tab Only |
| Tin | PT Bangka Serumpun | Indonesia | Conformant |
| Tin | PT Belitung Industri Sejahtera | Indonesia | Smelter Look-Up List Tab Only |
| Tin | PT Bukit Timah | Indonesia | Active |
| Tin | PT DS Jaya Abadi | Indonesia | Smelter Look-Up List Tab Only |
| Tin | PT Inti Stania Prima | Indonesia | Smelter Look-Up List Tab Only |
| Tin | PT Karimun Mining | Indonesia | Smelter Look-Up List Tab Only |
| Tin | PT Kijang Jaya Mandiri | Indonesia | Smelter Look-Up List Tab Only |
| Tin | PT Menara Cipta Mulia | Indonesia | Conformant |
| Tin | PT Mitra Stania Prima | Indonesia | Conformant |
| Tin | PT Panca Mega Persada | Indonesia | Smelter Look-Up List Tab Only |
| Tin | PT Premium Tin Indonesia | Indonesia | Smelter Look-Up List Tab Only |
| Tin | PT Prima Timah Utama | Indonesia | Conformant |
| Tin | PT Rajawali Rimba Perkasa | Indonesia | Conformant |
| Tin | PT Refined Bangka Tin | Indonesia | Conformant |
| Tin | PT Sariwiguna Binasentosa | Indonesia | Smelter Look-Up List Tab Only |
| Tin | PT Stanindo Inti Perkasa | Indonesia | Conformant |
| Tin | PT Sukses Inti Makmur | Indonesia | Active |
| Tin | PT Sumber Jaya Indah | Indonesia | Smelter Look-Up List Tab Only |
| Tin | PT Timah Tbk Kundur | Indonesia | Conformant |
| Tin | PT Tinindo Inter Nusa | Indonesia | Conformant |
| Tin | PT Tirus Putra Mandiri | Indonesia | Smelter Look-Up |

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| Tin | PT Tommy Utama | Indonesia | Smelter Look-Up List Tab Only |
| Tin | Resind Industria e Comercio Ltda. | Brazil | Conformant |
| Tin | Rui Da Hung | Taiwan | Conformant |
| Tin | Shenzhen XingHongTai Tin Company | China | Smelter Look-Up List Tab Only |
| Tin | Soft Metais Ltda. | Brazil | Conformant |
| Tin | Super Ligas | Brazil | Active |
| Tin | Thai Nguyen Mining and Metallurgy Co., Ltd. | Viet Nam | Conformant |
| Tin | Thaisarco | Thailand | Conformant |
| Tin | Tianjin Furen Industrial Group CO., Ltd. | China | Smelter Look-Up List Tab Only |
| Tin | Tin Technology & Refining | United States | Conformant |
| Tin | Tuyen Quang Non-Ferrous Metals Joint Stock Company | Viet Nam | Smelter Look-Up List Tab Only |
| Tin | White Solder Metalurgia e Mineracao Ltda. | Brazil | Conformant |
| Tin | Yunnan Chengfeng Non-ferrous Metals Co., Ltd. | China | Conformant |
| Tin | Yunnan Tin Company Limited | China | Conformant |
| Tin | Yunnan Yunfan Non-ferrous Metals Co., Ltd. | China | Conformant |
| Tin | Yushan xuang Dajin metalwork LTD | China | Smelter Look-Up List Tab Only |
| Tungsten | A.L.M.T. TUNGSTEN Corp. | Japan | Conformant |
| Tungsten | ACL Metais Eireli | Brazil | Conformant |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd. | China | Conformant |
| Tungsten | China Molybdenum Co., Ltd. | China | Smelter Look-Up List Tab Only |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd. | China | Conformant |
| Tungsten | CNMC (Guangxi) PGMA Co., Ltd. | China | Smelter Look-Up List Tab Only |
| Tungsten | Fujian Ganmin RareMetal Co., Ltd. | China | Conformant |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd. | China | Smelter Look-Up List Tab Only |
| Tungsten | Ganzhou Haichuang Tungsten Co., Ltd. | China | Conformant |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd. | China | Conformant |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd. | China | Conformant |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd. | China | Conformant |
| Tungsten | Global Tungsten & Powders Corp. | United States | Conformant |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd. | China | Conformant |
| Tungsten | H.C. Starck Tungsten GmbH | Germany | Conformant |
| Tungsten | Hunan Chenzhou Mining Co., Ltd. | China | Conformant |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji | China | Conformant |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd. | China | Conformant |
| Tungsten | Hunan Litian Tungsten Industry Co., Ltd. | China | Conformant |
| Tungsten | Hydrometallurg, JSC | Russian Federation | Conformant |
| Tungsten | Japan New Metals Co., Ltd. | Japan | Conformant |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd. | China | Conformant |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd. | China | Conformant |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. | China | Smelter Look-Up List Tab Only |

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| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | China | Conformant |
| Tungsten | Jiangxi Xianglu Tungsten Co., Ltd. | China | Smelter Look-Up List Tab Only |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd. | China | Conformant |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd. | China | Conformant |
| Tungsten | JSC "Kirovgrad Hard Alloys Plant" | Russian Federation | Active |
| Tungsten | Kennametal Fallon | United States | Conformant |
| Tungsten | Kennametal Huntsville | United States | Conformant |
| Tungsten | KGETS CO., LTD. | Korea, Republic of | Conformant |
| Tungsten | Lianyou Metals Co., Ltd. | Taiwan | Conformant |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd. | China | Conformant |
| Tungsten | Masan Tungsten Chemical LLC (MTC) | Viet Nam | Conformant |
| Tungsten | Moliren Ltd. | Russian Federation | Conformant |
| Tungsten | Niagara Refining LLC | United States | Conformant |
| Tungsten | Philippine Chuangxin Industrial Co., Inc. | Philippines | Conformant |
| Tungsten | South-East Nonferrous Metal Company Limited of Hengyang City | China | Conformant |
| Tungsten | TANIOBIS Smelting GmbH & Co. KG | Germany | Conformant |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd. | Viet Nam | Conformant |
| Tungsten | Unecha Refractory Metals Plant | Russian Federation | Conformant |
| Tungsten | Wolfram Bergbau und Hutten AG | Austria | Conformant |
| Tungsten | Woltech Korea Co., Ltd. | Korea, Republic of | Conformant |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd. | China | Conformant |
| Tungsten | Xiamen Tungsten Co., Ltd. | China | Conformant |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd. | China | Conformant |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd. | China | Smelter Look-Up List Tab Only |

We note the following in connection with the above table:

- a) Not all of the included smelters and refiners may have processed the necessary 3TG contained in our in-scope products, since most Suppliers reported at a “company level,” meaning that they reported the 3TG contained in all of their products, not just those in the products that they sold to us. Some Suppliers also may have reported smelters and refiners that were not in our supply chain due to over-inclusiveness in the information received from their suppliers or for other reasons. In addition, the smelters and refiners reflected above may not include all of the smelters and refiners in our supply chain, since some Suppliers did not identify all of the smelters and refiners used to process the necessary 3TG content contained in our in-scope products, and not all of the Suppliers responded to our inquiries.
- b) The table only includes entities that were listed as smelters or refiners by the RMI.
- c) Smelter or refiner status information in the table is as of April 30, 2021.
- d) “Conformant” means that a smelter has successfully completed an assessment against the applicable Responsible Minerals Assurance Process (“RMAP”) standard or an equivalent cross-recognized assessment. Smelters and refiners listed as “re-audit in progress” are still considered to be Conformant. Included smelters and refiners were not necessarily Conformant for all or part of 2020 and may not continue to be Conformant for any future period.
- e) “Active” means that the smelter or refiner has committed to undergo an RMAP assessment, completed the relevant documents, and scheduled the on-site assessment. These may be in the pre-assessment, assessment, or corrective-action phases of the assessment.
- f) “Smelter Look-up Tab Only” means that a smelter or refiner is listed on the Smelter Look-up tab list of the CMRT, but is not listed as “Conformant” or “Active.” The RMI notes on its website that the operational impacts of COVID-19 have led to postponements of some RMAP assessments. The RMI

website also notes that, due to the eligibility criteria for an RMAP assessment, smelters are sometimes removed from the Conformant list because they are no longer operational and not because they are non-conformant to the standard.

- g) Smelter or refiner status reflected in the table is based solely on information made publicly available by the RMI, without independent verification by us.
- h) Smelter and refiner country location is based on information published by the RMI, without independent verification by us.

Country of Origin Information

The identified countries of origin of the 3TG processed by the Conformant smelters and refiners listed in the table above may have included the countries listed below, as well as other countries, based on information provided by the RMI to its members. The Company has not been able to reliably determine the country of origin of any of the other smelters or refiners listed in the table.

| | | | |
|-----------------------------------|---------------|------------------|--------------------------|
| Argentina | Finland | Mexico | Slovakia |
| Australia | France | Mongolia | Solomon Islands |
| Austria | French Guiana | Morocco | Somaliland |
| Azerbaijan | Georgia | Mozambique | South Africa |
| Benin | Germany | Myanmar | Spain |
| Bolivia | Ghana | Namibia | Suriname |
| Botswana | Guatemala | Netherlands | Swaziland |
| Brazil | Guinea | New Zealand | Sweden |
| Burkina Faso | Guyana | Nicaragua | Taiwan |
| Burundi* | Honduras | Niger | Tajikistan |
| Canada | India | Nigeria | Tanzania* |
| Chile | Indonesia | Papua New Guinea | Thailand |
| China | Ivory Coast | Peru | Turkey |
| Colombia | Japan | Philippines | Uganda* |
| Cyprus | Kazakhstan | Portugal | United Kingdom |
| Democratic Republic of the Congo* | Kenya | Puerto Rico | United States of America |
| Dominican Republic | Laos | Russia | Uruguay |
| Ecuador | Liberia | Rwanda* | Uzbekistan |
| Egypt | Madagascar | Saudi Arabia | Vietnam |
| Eritrea | Malaysia | Senegal | Zambia* |
| Ethiopia | Mali | Serbia | Zimbabwe |
| Fiji | Mauritania | Sierra Leone | |

* Represents a Covered Country.

Alternatively, or in addition, some of the Conformant smelters and refiners may have sourced from recycled or scrap sources.

