As filed with the Securities and Exchange Commission on May 26, 2023

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

FORM SD (SPECIALIZED DISCLOSURE REPORT)

EMCORE CORPORATION

(Exact Name of Registrant as Specified in its Charter)

<u>New Jersey</u>

(State or other jurisdiction of incorporation)

001-36632 (Commission file number)

2015 W. Chestnut Street, Alhambra, CA 91803

(Address of principal executive offices, including zip code)



Ryan Hochgesang VP, General Counsel (626) 293-3400

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

The rule pursuant to which this form is being filed, and 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, 2022.

Rule 13q-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the fiscal year ended December 31, 2022.

INFORMATION TO BE INCLUDED IN THIS REPORT

SECTION 1 - CONFLICT MINERALS DISCLOSURE

Item 1.01 Conflict Minerals Disclosure and Report

In accordance with the disclosure requirements promulgated by the U.S. Securities and Exchange Commission, EMCORE Corporation has prepared a Conflict Minerals Report for the calendar year ended December 31, 2022. The Conflict Minerals Report is publicly available at the following Internet website: http://www.emcore.com/our-company/quality-management/supply-chain-management/.

Item 1.02 Exhibit

The Conflict Minerals Report required by Item 1.01 is provided as Exhibit 1.01 to this Form SD.

SECTION 2 - RESOURCE EXTRACTION ISSUER DISCLOSURE

Item 2.01 Resource Extraction Issuer Disclosure and Report

Not applicable.

SECTION 3 – EXHIBITS

Item 3.01 Exhibits

The following Exhibit is filed as part of this report.

Exhibit 1.01 - Conflict Minerals Report

SIGNATURE

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 hereunto duly authorized.

EMCORE CORPORATION

Dated: <u>May 26, 2023</u>

By: /s/ Tom Minichiello Name: Tom Minichiello Title: Chief Financial Officer

Conflict Minerals Disclosure

I. Introduction

EMCORE Corporation is providing this Conflict Minerals Report ("CMR") for calendar year 2022, as an Exhibit to Form SD, pursuant to Rule 13p-1 under the Securities Exchange Act of 1934 (the "Rule"), as amended. The Rule requires disclosure of certain information when a company manufactures or contracts to manufacture a product and any "conflict mineral" specified in the Rule is necessary for the functionality or production of such product. Conflict Minerals are defined by paragraph (d)(3) of Form SD as columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives, which are limited to tantalum, tin, and tungsten, or any other mineral or its derivatives determined by the U.S. Secretary of State to be financing conflict in the Covered Countries (collectively, "Conflict Minerals" or "3TG"). The "Covered Countries" for purposes of the Rule and this CMR are the Democratic Republic of the Congo ("DRC") and any country that shares an internationally recognized border with the DRC.

As used in this document, "Emcore," the "Company" and the words "we," "our," and "us" refer to EMCORE Corporation and its subsidiaries.

II. <u>Overview</u>

Company Profile

We are a leading provider of inertial navigation products for the aerospace and defense markets, and have also been a manufacturer of lasers and optical subsystems for use in the Cable TV ("CATV") industry. We leverage industry-leading Photonic Integrated Chip (PIC), Quartz MEMS, and Lithium Niobate chip-level technology to deliver state-of-the-art component and system-level products across our end-market applications. Over the last three years, we have expanded our scale and portfolio of inertial sensor products through the acquisitions of Systron Donner Inertial, Inc. in June 2019, the Space and Navigation business of L3Harris Technologies, Inc. in April 2022, and the FOG and Inertial Navigation Systems business of KVH Industries, Inc. in August 2022. We have vertically-integrated manufacturing capability at our headquarters in Alhambra, CA, and at our facilities in Budd Lake, NJ, Concord, CA, and Tinley Park, IL (the "Tinley Park Facility"). Our manufacturing facilities maintain ISO 9001 quality management certification, and we are AS9100 aerospace quality certified at our facilities in Budd Lake and Concord. These facilities support our vertically-integrated manufacturing strategy for quartz, FOG, and Ring Laser Gyro products for navigation systems.

As described in this CMR, certain of our operations manufacture, or contract to manufacture, products that contain 3TGs that are necessary to the functionality or production of those products. However, we do not directly source 3TGs from mines, smelters or refiners. We believe that, in most cases, we are several steps removed in the supply chain from these market participants, limiting our influence over their sourcing. We must therefore rely on our direct suppliers to provide information regarding the origin of necessary 3TGs that are included in our products, including sources of 3TGs that are supplied to them by sub-tier suppliers.

Conflict Minerals Policy

We are committed to responsible sourcing from our suppliers and each supplier is required to provide information about their Conflict Minerals programs and sourcing practices related to 3TGs by submitting a CMRT. At our request, each of our suppliers shall permit us to assess its practices and procedures and shall provide us with any information reasonably requested. In addition, each supplier agrees to provide information to us necessary for us to comply with our conflict minerals reporting requirements, including without limitation information under the Responsible Minerals Initiative's ("RMI") Conflict Minerals Reporting Template ("CMRT"). Our Conflict Minerals Policy is available on our corporate website at http://emcore.com/our-company/quality-management/supply-chain-management.

III. <u>Reasonable Country of Origin Inquiry Information</u>

We have conducted a good faith reasonable country of origin inquiry ("RCOI") to determine whether the 3TGs included in and necessary to the functionality of our products described under "Product Description" in Section V below originated in the Covered Countries or came from recycled or scrap sources. We engaged a leading 3TGs data management consultant (the "Consultant") to assist us in conducting this RCOI. We utilized a software-as-a-service (SaaS) platform provided by the Consultant to complete and track supplier communications, as well as allow suppliers to upload completed CMRTs for validation, assessment and management. The platform also provides functionality that meets the OECD Guidance process expectations by evaluating the quality of each supplier response and assigning a health score based on the supplier's declaration of process engagement. Additionally, the metrics provided in this report, as well as the step-by-step process for supplier engagement and upstream due diligence investigations performed, are managed through this platform.

The use of the CMRT allowed for some elimination of irrelevant suppliers. We also periodically reviewed the supplier list to ensure that irrelevant or "out of scope" suppliers were removed from the survey process. Our program continues to include automated data validation on all submitted CMRTs. The goal of data validation is to increase the accuracy of submissions and identify any contradictory answers in the CMRT. This data validation is based on questions within the declaration tab of the CMRT which helps to identify areas that require further classification or risk assessment, as well as understand the due diligence efforts of the Tier 1 suppliers. The results of this data validation contribute to the program's health assessment and are shared with the suppliers to ensure they understand areas that require clarification or improvement.

All submitted forms are accepted and classified as valid or invalid so that data is still retained. Suppliers are contacted in regard to invalid forms and are encouraged to submit a valid form. Suppliers are also provided with guidance on how to correct these validation errors in the form of feedback to their CMRT submission, training courses and direct engagement help through the Consultant's multilingual Supplier Experience team. Since some suppliers may remain unresponsive to feedback, we track program gaps to account for future improvement opportunities. As of May 12, 2023, there were 11 invalid supplier submissions that could not be corrected.

The Consultant compared the list of smelters and refiners provided in our suppliers' responses to the lists of smelters maintained by the RMI and, if a supplier indicated that a facility was certified as conflict-free, confirmed that the facility was listed on RMI's list of validated conflict free smelters and refiners of 3TGs.

To the extent applicable, our RCOI utilized the same processes and procedures for our due diligence described in Section IV below. This RCOI process included conducting an inquiry of our direct suppliers using a mechanism common in the technology industry: the CMRT version 6.01. Based on the results of our RCOI, we are required to exercise due diligence on the source and chain of custody of the necessary 3TGs contained in our products. Our due diligence efforts are discussed further in Section IV of this CMR.

IV. <u>Due Diligence Process and Measures Performed</u>

Based on the results of our RCOI, the Consultant engaged by us also assisted us in conducting due diligence on the source and chain of custody of 3TGs in our products. Our due diligence measures are designed to attempt to ascertain the facilities used to process any 3TGs in our products, the country of origin of any 3TGs in our products and the mine(s) or location of origin with the greatest possible specificity.

The design of our due diligence system, its conformity with an internationally-recognized due diligence framework, and a description of the measures we have undertaken to exercise our due diligence, are detailed below.

Our due diligence measures have been designed to conform in all material respects to the internationally- recognized due diligence framework of the Organization for Economic Co-operation and Development ("OECD") *Due Diligence Guidance for Responsible Supply Chain of Minerals from Conflict- Affected and High-Risk Areas* (Second Edition), and its related supplements. This OECD framework ("Framework") is the only due diligence framework recognized by the Securities and Exchange Commission ("SEC") to date. The Framework stresses five main areas of Due Diligence design, detailed below in IV(a) – (e).

Due diligence requires our necessary reliance on data provided by direct suppliers and third-party audit programs. There is a risk of incomplete or inaccurate data as the process cannot fully be owned by us. However, through continued outreach and process validation, this aligns with industry standards and market expectations for downstream companies' due diligence.

a. Establish Strong Company Management Systems

First, we have assigned a Director of Supply Chain Management to (i) manage the 3TGs compliance program, (ii) liaise with the Consultant, (iii) conduct reviews of collected data, and (iv) make decisions regarding the due diligence program, including risk mitigation. Second, we have requested that suppliers of goods incorporated into our products provide us with CMRTs for their products (*see* below, Section IV(b & c)). Third, our position statement with respect to 3TGs, which is located on our website (https://emcore.com/our-company/quality-management/supply-chain-management/), encourages our suppliers to source responsibly, through their sub-suppliers and on down through their own supply chains. In this position statement, we encourage our suppliers and their sub suppliers to use smelters or refiners ("smelters" or "SORs") that are conformant to assessment protocols for conflict-free sourcing wherever possible. Using its Responsible Minerals Assurance Process ("RMAP") audit program, the RMI, an organization founded by members of the Electronic Industry Citizen Coalition ("EICC") and the Global e-Sustainability Initiative ("GeSI"), is taking action to address responsible sourcing, using independent third-party audits to identify smelters and refiners that have systems in place to assure sourcing of only conflict-free materials.

We also leverage the Consultant's managed services in order to work with dedicated program specialists who support our conflict minerals program. We communicate regularly with the Consultant's team in order to receive updates on program status. Each member of the Consultant's customer success team is trained in conflict minerals compliance and understands the intricacies of the CMRT and conflict minerals reporting, as well as Section 1502 of the Dodd-Frank Act.

Grievance Mechanisms

We established multiple longstanding grievance mechanisms whereby employees and suppliers can report violations of our policies, including with respect to conflict minerals. Suppliers and others outside of Emcore may contact our conflict minerals team to communicate with us, including to report grievances. In addition, our employees may anonymously report suspected violations using our anonymous ethics hotline, either via our website at https://emcore.ethicspoint.com or by calling 1-833-626-1524 in the United States, or with the associated country code outside the United States, and 10-800-711-0887 or 10-800-110-0812 in China.

Maintain Records

We have adopted a policy to retain relevant conflict minerals related documentation for a period of 5 years, including supplier responses to CMRTs, and implemented this policy through the Consultant. The Consultant stores all of the information and findings from this process in a database that can be audited by internal or external parties.



b. Identify and Assess Risk in the Supply Chain

To obtain chain of custody declarations from our suppliers, we utilize the CMRT described above. This CMRT is distributed to all of our suppliers, with regular and persistent follow-ups ("Escalations"), to ensure maximum compliance and feedback. The CMRT includes questions on (i) the use and origin of 3TGs in our components, (ii) supplier engagement with their sub-tier suppliers, and (iii) smelters and points of origin of the constituent 3TGs. The Consultant provides suppliers with guidance and requirements to prepare them ahead of time for full compliance in completing the CMRT, our principal information-gathering step on the origin, source and chain of custody of 3TGs contained in components and materials supplied to us. This kit includes materials to educate suppliers about the SEC rule on 3TGs, responsible supply chain management, and a letter that suppliers can use if they need to request information from their sub-tier suppliers.

The CMRT responses are only a first step in our engagement with suppliers. The responses from suppliers are then individually validated and examined both for completeness and any internal inconsistencies between the data they provide. Any of these issues are resolved with our suppliers by phone and email. This follow-up to incomplete or invalid information is described further in Section IVI, below.

To the extent that a completed response identified a smelter or refiner, the Consultant determined if the smelter had been audited against a standard in conformance with the OECD Guidance, such as the Responsible Minerals Assurance Process ("RMAP"). We do not have a direct relationship with smelters and refiners and do not perform direct audits of these entities within the supply chain. Smelters that have completed an RMAP audit are considered to be DRC-conflict free. In cases where the smelter's due diligence practices have not been audited against the RMAP standard or they are considered non-conformant by RMAP, follow-ups are made to suppliers reporting those facilities. Smelters are then assessed for the potential for sourcing risk. We also attempted to ascertain whether the smelter or refiner information provided was specific to the products supplied to us to determine whether the identified smelters are in our supply chain.

Each facility that meets the RMI definition of a smelter or refiner of a 3TGs mineral is assessed according to red flag indicators defined in the OECD Guidance. The Consultant uses numerous factors to determine the level of risk that each smelter poses to the supply chain by identifying red flags. These factors include:

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

As part of our risk management plan under the OECD Guidance, when facilities with red flags were reported on a CMRT by one of the suppliers surveyed, risk mitigation activities are initiated. Through the Consultant's software, submissions that include any smelters of concern immediately produce a receipt instructing the supplier to take their own risk mitigation actions, including submission of a product specific CMRT to better identify the connection to products that they supply to us, and escalating up to removal of these red flag smelters from their supply chain. In addition, suppliers are guided to the educational materials on mitigating the risks identified through the data collection process.

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

As outlined above, we have developed processes for Escalations and supplier engagement. This allows us to direct needed questions and follow-up to suppliers based on their varying responses to the CMRT. Escalations are used when, among other issues, suppliers are late in responding, have incomplete information, provide feedback inconsistent with prior responses, or when other issues are identified. An Escalation may include individual written requests for information, conference calls and meetings. Each Escalation is dated and tagged in our data management system for a variety of further actions. These actions might include direct supplier contact through our business channels, changes of scope of the diligence request, reformatting supplier responses into the correct format, time extensions for delayed responses, follow-up with alternative contacts in the supplying organization, or the dropping of outdated component parts from our products list.

d. Carry Out Independent Third Party Audit of Supply Chain Due Diligence at Identified Points in the Supply Chain

Because we do not source 3TG directly from smelters or refiners, we rely on third parties, including the RMI, to coordinate and conduct third party audits of these facilities. We utilize the published results of these third-party audits to determine whether a specified smelter or refiner processes 3TG that directly or indirectly finances or benefits armed groups. The Consultant also directly contacts smelters and refiners that are not currently enrolled in the RMAP to encourage their participation and gather information regarding each facilities' sourcing practices on behalf of its compliance partners.

e. Report on Supply Chain Due Diligence

Our Form SD and this CMR are both available under "Quality Management" in the "Company" section of our website at http://www.<u>emcore.com/our-company/quality-management/</u>. We will file a Form SD (and CMRs, as necessary) with the SEC on an annual basis, pursuant to Rule 13p-1 of the Securities Exchange Act of 1934, as amended.

V. <u>Due Diligence Results</u>

a. Supply Chain Outreach Results

Supply chain outreach is required to identify the upstream sources of origin of tin, tantalum, tungsten and gold. Following the industry standard process, CMRTs are sent to and requested from Tier 1 suppliers, who are expected to follow this process until the smelter and refiner sources are identified. As of May 12, 2023, there were 375 suppliers in scope of the conflict minerals program and 320 provided a completed CMRT. Our total response rate for this reporting year was 85.3%.

b. Upstream Data Transparency

All smelters and refiners listed by suppliers in completed CMRTs, which appear on the RMI-maintained smelters list, are attached in Appendix A. As is a common practice when requests are sent upstream in the supply chain, those who purchase materials from smelters may not be able to discern exactly which companies' product lines the materials may end up in. As a result, those providing the smelters and refiners have the practice of listing all smelters and refiners they may purchase from within the reporting period. Therefore, the smelters or refiners (as sources) listed in Appendix A are likely to be more comprehensive than the list of smelters or refiners which actually processed the 3TGs contained in our products.

Although the potential for over-reporting is understood, we have taken measures to validate these sources of origin against validated audit programs intended to verify the material types and mine sources of origin for these smelters and refiners. Suppliers that identified these specific smelters of concern on their CMRT were contacted in accordance with the OECD Guidance to inform them of the potential for risk, and to evaluate whether or not these smelters could be connected to our products. The suppliers were asked to complete a user-defined or product-level CMRT specific to the materials, products or piece parts purchased by us, rather than a company-level CMRT, to better identify the connection to products that they supply to us. Other suppliers were evaluated internally to determine if they were in fact still active suppliers. If not, they were removed from the scope of data collection.

c. Countries of Origin

Appendix B includes an aggregated list of countries of origin from which the reported facilities collectively source 3TGs, based on information provided through the CMRT data collection process, from direct smelter outreach and the RMAP. As mentioned in the above section, it is understood that many responses may provide more data than can be directly linked to products sold by us. Therefore, Appendix B may contain more countries than those that our products are being sourced from. We have taken, or intend to take, the following steps to improve the due diligence conducted to further mitigate any risk that the necessary 3TGs in our products could benefit armed groups in the DRC or adjoining countries:

- · Continue to evaluate upstream sources through a broader set of tools to evaluate risk. These include, but are not limited to:
 - o Using a comprehensive smelter and refiner library with detailed status and notes for each listing.
 - o Scanning for credible media on each smelter and refiner to flag risk issues.
 - o Comparing the list of smelters and refiners against government watch and denied parties lists.
- Engage with suppliers more closely and provide more information and training resources regarding responsible sourcing of 3TGs.
- Encourage suppliers to have due diligence procedures in place for their supply chains to improve the content of the responses from such suppliers.
- Continue to include a conflict minerals flow-down clause in new or renewed supplier contracts, as well as included in the terms and conditions of each purchase order issued.
- Following the OECD Guidance process, increase the emphasis on clean and validated smelter and refiner information from the supply chain through feedback and detailed smelter analysis.

d. Smelter & Refiner Risk Evaluation

Understanding the risks associated with the smelters and refiners potentially providing material into our supply chain is an important part of the due diligence process. Through the Consultant, comprehensive and ongoing analysis is conducted by the Consultant's smelter library manager to assess sourcing risk. This information is used to:

- Provide suppliers with feedback.
- · Determine the effectiveness of our overall program.
- · Conduct outreach to smelters, refiners and their respective associations.
- · Provide detailed analysis in this report.

The following risk categories are used for smelter evaluation and risk determination:

- Geo-risk
 - Whether the mineral originated from or has been transported through a conflict-affected area as defined by Section 1502 of the Dodd-Frank Act (the DRC and its nine adjoining countries: Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia).
- · Audit status
 - o Whether the refiner's due diligence practices has been audited against a standard in conformance with the OECD Guidance.
 - The Consultant relies on the RMI audit standard, including cross-recognition of the London Bullion Market Association ("LBMA") Good Delivery Program and the Responsible Jewelry Council Chain of Custody Certification, which are developed according to global standards, including the OECD Guidance.



· Sourcing risk

o Whether evidence of any other red flag that is supported by credible sources has been identified.

VI. <u>Product Description; Processing Facilities</u>

Product Description – Our business is of a broad portfolio of compound semiconductor-based products for the Aerospace and Defense market and, historically, the Broadband market.

• Inertial Navigation Products

These include products ranging from tactical to navigational grade gyros (including fiber optics gyroscopes, ring laser gyroscopes and Quartz MEMS gyroscopes), accelerometers, IMU and INS that have broad application within the aerospace and defense markets, including guidance, navigation, control, pointing, and stabilization applications in commercial and military aircraft, unmanned aerial systems, unmanned autonomous vehicles, land vehicles, precision guided weapons, and industrial and marine.

Defense Optoelectronics Products

These include transmitters, receivers, subsystems, and systems that transport ultra-broadband, wideband radio frequency and microwave signals between satellite hub equipment and antenna dishes, with applications including satellite antenna remoting and signal distribution, inter- and intra-facility links, site diversity systems, high-performance supertrunking links, electronic warfare systems, and radar testing.

<u>Cable TV Lasers and Transmitters Products</u>

These include forward and return-path 1310 nm and 1550 nm distributed feedback analog lasers, optical receivers optimized for CATV, data over cable service interface specification 3.1 and wireless, broadband photodiodes used in forward-and return-path broadband, subassembly components, analog fiber-optic transmitters, quadrature amplitude modulation transmitters, and CATV fiber amplifiers.

• Optical Sensing Products

These include narrow linewidth 1310 and 1550 nm DFB lasers optimized for Light Detecting and Ranging ("LiDAR") and distributed sensing applications and a continuous wavelength, coherent optical source laser for frequency modulation continuous wavelength ("FMCW") sensing LiDAR applications.

Data Center Chips

These include custom chip devices tailored to specific customer requirements and applications for linear, coherent laser sources.

Processing Facilities – Based on our RCOI or due diligence process, as applicable, and the information received from our suppliers, the facilities listed on Appendix A were identified by our suppliers as the smelters and refiners that processed the 3TG present in and necessary to the functionality of products manufactured by us in the calendar year 2022.

Due to our position in the supply chain, which we discuss above, we rely on our suppliers for accurate smelter and refiner information. Our due diligence measures cannot provide adequate certainty regarding the source and chain of custody of the necessary 3TGs contained in our in-scope products. The information from our suppliers is still evolving and may contain company level declarations. As such, this smelter list is presented in good faith as the best information we have to date. This list may contain smelters that are not in our supply chain and there may be other smelters not yet identified in our due diligence process. We will continue to update the list as our information and the relevant third-party data from RMI, LBMA, and RJC improves.



VII. <u>Future Due Diligence</u>

We will continue to communicate our expectations and information requirements to our direct suppliers. Over time, we anticipate that the amount of information globally on the traceability and sourcing of the necessary 3TGs in our products will increase and improve our knowledge. We will continue to make inquiries to our direct suppliers and undertake additional risk assessments when potentially relevant changes in facts or circumstances are identified. If we become aware of a supplier whose due diligence needs improvement, we may continue the trade relationship while that supplier improves its compliance program. We expect our suppliers to take similar measures with their suppliers to ensure alignment throughout the supply chain.

In addition to those above, we will undertake the following steps during the next compliance period:

- Continue to collect responses from suppliers using the most recent revision of the CMRT.
- Engage with suppliers that did not provide a response in 2022 or provided incomplete responses to help with our data collections for 2023.
- Monitor and track performance of risk mitigation efforts.
- Compare and validate RCOI results to information collected via independent conflict-free smelter validation programs such as the RMI.

<u>Appendix A</u>

Smelter and Refiner Information

| Metal | Standard Smelter Name | Smelter ID | RMI Audit Status* |
|----------|---|------------|-------------------|
| Tin | Alpha | CID000292 | Conformant |
| Tin | EM Vinto | CID000438 | Conformant |
| Tin | PT Stanindo Inti Perkasa | CID001468 | Conformant |
| Tin | PT Timah Tbk Kundur | CID001477 | Conformant |
| Tin | PT Timah Tbk Mentok | CID001482 | Conformant |
| Tin | PT Tinindo Inter Nusa | CID001490 | Non Conformant |
| Tantalum | Telex Metals | CID001891 | Conformant |
| Tin | Thaisarco | CID001898 | Conformant |
| Gold | United Precious Metal Refining, Inc. | CID001993 | Conformant |
| Tin | White Solder Metalurgia e Mineracao Ltda. | CID002036 | Conformant |
| Tin | Tin Smelting Branch of Yunnan Tin Co., Ltd. | CID002180 | Conformant |
| Gold | Geib Refining Corporation | CID002459 | Conformant |
| Tin | Magnu's Minerais Metais e Ligas Ltda. | CID002468 | Conformant |
| Tin | Aurubis Beerse | CID002773 | Conformant |
| Tin | PT Menara Cipta Mulia | CID002835 | Conformant |
| Tin | Guangdong Hanhe Non-Ferrous Metal Co., Ltd. | CID003116 | Conformant |
| Tin | Chifeng Dajingzi Tin Industry Co., Ltd. | CID003190 | Conformant |
| Tungsten | A.L.M.T. Corp. | CID000004 | Conformant |
| Gold | Advanced Chemical Company | CID000015 | Conformant |
| Gold | Aida Chemical Industries Co., Ltd. | CID000019 | Conformant |
| Gold | Agosi AG | CID000035 | Conformant |
| Gold | Almalyk Mining and Metallurgical Complex (AMMC) | CID000041 | Conformant |
| Gold | AngloGold Ashanti Corrego do Sitio Mineracao | CID000058 | Conformant |
| Gold | Argor-Heraeus S.A. | CID000077 | Conformant |
| Gold | Asahi Pretec Corp. | CID000082 | Conformant |
| Gold | Asaka Riken Co., Ltd. | CID000090 | Conformant |
| Gold | Atasay Kuyumculuk Sanayi Ve Ticaret A.S. | CID000103 | Outreach Required |
| Tungsten | Kennametal Huntsville | CID000105 | Conformant |
| Gold | Aurubis AG | CID000113 | Conformant |
| Gold | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | CID000128 | Conformant |
| Gold | Boliden AB | CID000157 | Conformant |
| Gold | C. Hafner GmbH + Co. KG | CID000176 | Conformant |
| Gold | Caridad | CID000180 | Outreach Required |
| Gold | CCR Refinery - Glencore Canada Corporation | CID000185 | Conformant |
| Gold | Cendres + Metaux S.A. | CID000189 | Non Conformant |
| Gold | Yunnan Copper Industry Co., Ltd. | CID000197 | Outreach Required |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd. | CID000218 | Conformant |

| Tin | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | CID000228 | Conformant |
|----------|---|-----------|---|
| Gold | Chimet S.p.A. | CID000233 | Conformant |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd. | CID000258 | Conformant |
| Gold | Chugai Mining | CID000264 | Conformant |
| Tungsten | CNMC (Guangxi) PGMA Co., Ltd. | CID000281 | Outreach Required |
| Tin | PT Aries Kencana Sejahtera | CID000309 | Conformant |
| Tin | PT Premium Tin Indonesia | CID000313 | Conformant |
| Gold | Daye Non-Ferrous Metals Mining Ltd. | CID000343 | In Communication |
| Gold | DSC (Do Sung Corporation) | CID000359 | Conformant |
| Gold | Dowa | CID000401 | Conformant |
| Tin | Dowa | CID000402 | Conformant |
| Gold | Eco-System Recycling Co., Ltd. East Plant | CID000425 | Conformant |
| Tin | Estanho de Rondonia S.A. | CID000448 | Conformant |
| Tantalum | F&X Electro-Materials Ltd. | CID000460 | Conformant |
| Gold | JSC Novosibirsk Refinery | CID000493 | RMI Due Diligence Review |
| 0.11 | | CIDOOCEDD | - Unable to Proceed |
| Gold | Refinery of Seemine Gold Co., Ltd. | CID000522 | Outreach Required |
| Tin | Gejiu Zili Mining And Metallurgy Co., Ltd. | CID000555 | Non Conformant |
| Tungsten | Global Tungsten & Powders LLC | CID000568 | Conformant |
| Tantalum | XIMEI RESOURCES (GUANGDONG) LIMITED | CID000616 | Conformant |
| Gold | Guoda Safina High-Tech Environmental Refinery Co., Ltd. | CID000651 | Outreach Required |
| Gold | Hangzhou Fuchunjiang Smelting Co., Ltd. | CID000671 | Outreach Required |
| Gold | LT Metal Ltd. | CID000689 | Conformant |
| Gold | Heimerle + Meule GmbH | CID000694 | Conformant |
| Gold | Heraeus Metals Hong Kong Ltd. | CID000707 | Conformant |
| Gold | Heraeus Germany GmbH Co. KG | CID000711 | Conformant |
| Tungsten | Hunan Chenzhou Mining Co., Ltd. | CID000766 | Conformant |
| Gold | Hunan Chenzhou Mining Co., Ltd. | CID000767 | Outreach Required |
| Tungsten | Hunan Jintai New Material Co., Ltd. | CID000769 | Non Conformant |
| Gold | Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd. | CID000773 | Outreach Required |
| Gold | HwaSeong CJ CO., LTD. | CID000778 | Communication Suspended - Not Interested |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | CID000801 | Conformant |
| Gold | Ishifuku Metal Industry Co., Ltd. | CID000807 | Conformant |
| Gold | Istanbul Gold Refinery | CID000814 | Conformant |
| Gold | Japan Mint | CID000823 | Conformant |
| Tungsten | Japan New Metals Co., Ltd. | CID000825 | Conformant |
| Gold | Jiangxi Copper Co., Ltd. | CID000855 | Conformant |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd. | CID000875 | Conformant |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd. | CID000914 | Conformant |
| Tantalum | Jiujiang Tanbre Co., Ltd. | CID000917 | Conformant |
| Gold | Asahi Refining USA Inc. | CID000920 | Conformant |
| Gold | Asahi Refining Canada Ltd. | CID000924 | Conformant |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant | CID000927 | RMI Due Diligence Review - Unable to Proceed |

| Gold | JSC Uralelectromed | CID000929 | RMI Due Diligence Review - Unable to Proceed |
|----------|---|-----------|---|
| Gold | JX Nippon Mining & Metals Co., Ltd. | CID000937 | Conformant |
| Tin | Gejiu Kai Meng Industry and Trade LLC | CID000942 | Non Conformant |
| Gold | Kazakhmys Smelting LLC | CID000956 | In Communication |
| Gold | Kazzinc | CID000957 | Conformant |
| Tungsten | Kennametal Fallon | CID000966 | Conformant |
| Gold | Kennecott Utah Copper LLC | CID000969 | Conformant |
| Gold | Kojima Chemicals Co., Ltd. | CID000981 | Conformant |
| Gold | Kyrgyzaltyn JSC | CID001029 | Non Conformant |
| Gold | L'azurde Company For Jewelry | CID001032 | RMI Due Diligence Review - Unable to Proceed |
| Gold | Lingbao Gold Co., Ltd. | CID001056 | Outreach Required |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd. | CID001058 | Outreach Required |
| Tantalum | AMG Brasil | CID001076 | Conformant |
| Gold | LS-NIKKO Copper Inc. | CID001078 | Conformant |
| Gold | Luoyang Zijin Yinhui Gold Refinery Co., Ltd. | CID001093 | Outreach Required |
| Gold | Materion | CID001113 | Conformant |
| Gold | Matsuda Sangyo Co., Ltd. | CID001119 | Conformant |
| Gold | Metalor Technologies (Suzhou) Ltd. | CID001147 | Conformant |
| Gold | Metalor Technologies (Hong Kong) Ltd. | CID001149 | Conformant |
| Gold | Metalor Technologies (Singapore) Pte., Ltd. | CID001152 | Conformant |
| Gold | Metalor Technologies S.A. | CID001153 | Conformant |
| Gold | Metalor USA Refining Corporation | CID001157 | Conformant |
| Gold | Metalurgica Met-Mex Penoles S.A. De C.V. | CID001161 | Conformant |
| Tantalum | Metallurgical Products India Pvt., Ltd. | CID001163 | Conformant |
| Tantalum | Mineracao Taboca S.A. | CID001175 | Conformant |
| Gold | Mitsubishi Materials Corporation | CID001188 | Conformant |
| Tantalum | Mitsui Mining and Smelting Co., Ltd. | CID001192 | Conformant |
| Gold | Mitsui Mining and Smelting Co., Ltd. | CID001193 | Conformant |
| Tantalum | NPM Silmet AS | CID001200 | Conformant |
| Gold | Moscow Special Alloys Processing Plant | CID001204 | RMI Due Diligence Review - Unable to Proceed |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.S. | CID001220 | Conformant |
| Tin | Jiangxi New Nanshan Technology Ltd. | CID001231 | Conformant |
| Gold | Navoi Mining and Metallurgical Combinat | CID001236 | Conformant |
| Gold | Nihon Material Co., Ltd. | CID001259 | Conformant |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd. | CID001277 | Conformant |
| Tin | Novosibirsk Tin Combine | CID001305 | RMI Due Diligence Review - Unable to Proceed |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd. | CID001314 | Conformant |
| Gold | Ohura Precious Metal Industry Co., Ltd. | CID001325 | Conformant |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | CID001326 | RMI Due Diligence Review - Unable to Proceed |
| Gold | MKS PAMP SA | CID001352 | Conformant |
| Gold | Penglai Penggang Gold Industry Co., Ltd. | CID001362 | Outreach Required |

| Gold | Prioksky Plant of Non-Ferrous Metals | CID001386 | RMI Due Diligence Review - Unable to Proceed |
|----------|---|-----------|---|
| Gold | PT Aneka Tambang (Persero) Tbk | CID001397 | Conformant |
| Tin | PT Artha Cipta Langgeng | CID001399 | Conformant |
| Tin | PT Babel Inti Perkasa | CID001402 | Conformant |
| Tin | PT Babel Surya Alam Lestari | CID001406 | Conformant |
| Tin | PT Bangka Tin Industry | CID001419 | In Communication |
| Tin | PT Belitung Industri Sejahtera | CID001421 | Active |
| Tin | PT Bukit Timah | CID001428 | Conformant |
| Tin | PT Panca Mega Persada | CID001457 | In Communication |
| Tin | PT Prima Timah Utama | CID001458 | Conformant |
| Tin | PT Sariwiguna Binasentosa | CID001463 | Conformant |
| Tin | PT Timah Nusantara | CID001486 | Active |
| Tin | PT Tommy Utama | CID001493 | Conformant |
| Gold | PX Precinox S.A. | CID001498 | Conformant |
| Tantalum | QuantumClean | CID001508 | Conformant |
| Gold | Rand Refinery (Pty) Ltd. | CID001500 | Conformant |
| Tantalum | Yanling Jincheng Tantalum & Niobium Co., Ltd. | CID001512 | Conformant |
| Gold | Royal Canadian Mint | CID001522 | Conformant |
| Tin | Rui Da Hung | CID001534 | Conformant |
| Gold | Sabin Metal Corp. | CID001535 | Communication Suspended |
| Golu | Sabili Metal Colp. | CID001340 | - Not Interested |
| Gold | Samduck Precious Metals | CID001555 | Non Conformant |
| Gold | Samwon Metals Corp. | CID001562 | Communication Suspended - Not Interested |
| Gold | SEMPSA Joyeria Plateria S.A. | CID001585 | Conformant |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | CID001619 | Outreach Required |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd. | CID001622 | Conformant |
| Gold | Sichuan Tianze Precious Metals Co., Ltd. | CID001736 | Conformant |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals | CID001756 | RMI Due Diligence Review - Unable to Proceed |
| Gold | Solar Applied Materials Technology Corp. | CID001761 | Conformant |
| Tantalum | Solikamsk Magnesium Works OAO | CID001769 | RMI Due Diligence Review - Unable to Proceed |
| Gold | Sumitomo Metal Mining Co., Ltd. | CID001798 | Conformant |
| Gold | Super Dragon Technology Co., Ltd. | CID001810 | Outreach Required |
| Tantalum | Taki Chemical Co., Ltd. | CID001869 | Conformant |
| Gold | Tanaka Kikinzoku Kogyo K.K. | CID001875 | Conformant |
| Tin | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | CID001908 | Non Conformant |
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM | CID001909 | Outreach Required |
| Gold | Shandong Gold Smelting Co., Ltd. | CID001916 | Conformant |
| Gold | Tokuriki Honten Co., Ltd. | CID001938 | Conformant |
| Gold | Tongling Nonferrous Metals Group Co., Ltd. | CID001947 | Outreach Required |
| Gold | Torecom | CID001955 | Conformant |
| ' | | CID001969 | Conformant |
| Tantalum | Ulba Metallurgical Plant JSC | | Conformant |

| Gold | Valcambi S.A. | CID002003 | Conformant |
|----------|--|-----------|---|
| Tin | VQB Mineral and Trading Group JSC | CID002015 | Outreach Required |
| Gold | Western Australian Mint (T/a The Perth Mint) | CID002030 | Conformant |
| Tungsten | Wolfram Bergbau und Hutten AG | CID002044 | Conformant |
| Tungsten | Xiamen Tungsten Co., Ltd. | CID002082 | Conformant |
| Gold | Yamakin Co., Ltd. | CID002100 | Conformant |
| Gold | Yokohama Metal Co., Ltd. | CID002129 | Conformant |
| Tin | Yunnan Chengfeng Non-ferrous Metals Co., Ltd. | CID002158 | Conformant |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | CID002224 | Conformant |
| Gold | Gold Refinery of Zijin Mining Group Co., Ltd. | CID002243 | Conformant |
| Gold | Morris and Watson | CID002282 | In Communication |
| Gold | SAFINA A.S. | CID002290 | Conformant |
| Gold | Guangdong Jinding Gold Limited | CID002312 | Outreach Required |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. | CID002313 | Communication Suspended - Not Interested |
| Gold | Umicore Precious Metals Thailand | CID002314 | Non Conformant |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd. | CID002315 | Conformant |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd. | CID002316 | Conformant |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd. | CID002317 | Conformant |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | CID002318 | Conformant |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd. | CID002319 | Conformant |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd. | CID002320 | Conformant |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd. | CID002321 | Conformant |
| Tin | CV Venus Inti Perkasa | CID002455 | Conformant |
| Tin | PT Tirus Putra Mandiri | CID002478 | In Communication |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd. | CID002492 | Conformant |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd. | CID002494 | Conformant |
| Tin | Melt Metais e Ligas S.A. | CID002500 | Non Conformant |
| Tungsten | Asia Tungsten Products Vietnam Ltd. | CID002502 | Conformant |
| Tin | PT ATD Makmur Mandiri Jaya | CID002503 | Conformant |
| Tantalum | D Block Metals, LLC | CID002504 | Conformant |
| Tantalum | FIR Metals & Resource Ltd. | CID002505 | Conformant |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd. | CID002506 | Conformant |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd. | CID002508 | Conformant |
| Gold | MMTC-PAMP India Pvt., Ltd. | CID002509 | Conformant |
| Gold | KGHM Polska Miedz Spolka Akcyjna | CID002511 | Conformant |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd. | CID002512 | Conformant |
| Tungsten | Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch | CID002513 | Conformant |
| Gold | Fidelity Printers and Refiners Ltd. | CID002515 | RMI Due Diligence Review - Unable to Proceed |
| Gold | Singway Technology Co., Ltd. | CID002516 | Non Conformant |
| Tin | O.M. Manufacturing Philippines, Inc. | CID002517 | Conformant |
| Gold | Shandong Humon Smelting Co., Ltd. | CID002525 | Outreach Required |
| Gold | Shenzhen Zhonghenglong Real Industry Co., Ltd. | CID002527 | Outreach Required |

| Tantalum | KEMET de Mexico | CID002539 | Conformant |
|----------|--|-----------|--------------------------|
| Tungsten | H.C. Starck Tungsten GmbH | CID002541 | Conformant |
| Tungsten | TANIOBIS Smelting GmbH & Co. KG | CID002542 | Conformant |
| Tungsten | Masan High-Tech Materials | CID002543 | Conformant |
| Tantalum | TANIOBIS Co., Ltd. | CID002544 | Conformant |
| Tantalum | TANIOBIS GmbH | CID002545 | Conformant |
| Tantalum | Materion Newton Inc. | CID002548 | Conformant |
| Tantalum | TANIOBIS Japan Co., Ltd. | CID002549 | Conformant |
| Tantalum | TANIOBIS Smelting GmbH & Co. KG | CID002550 | Conformant |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd. | CID002551 | Conformant |
| Tantalum | Global Advanced Metals Boyertown | CID002557 | Conformant |
| Tantalum | Global Advanced Metals Aizu | CID002558 | Conformant |
| Gold | Al Etihad Gold Refinery DMCC | CID002560 | Conformant |
| Gold | Emirates Gold DMCC | CID002561 | Conformant |
| Gold | International Precious Metal Refiners | CID002562 | In Communication |
| Gold | Kaloti Precious Metals | CID002563 | RMI Due Diligence Review |
| Golu | Kalou Frecious Metals | CID002303 | - Unable to Proceed |
| Gold | Sudan Gold Refinery | CID002567 | Outreach Required |
| Tin | CV Ayi Jaya | CID002570 | Conformant |
| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | CID002572 | Non Conformant |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company | CID002573 | Outreach Required |
| Tin | Tuyen Quang Non-Ferrous Metals Joint Stock Company | CID002574 | Outreach Required |
| Gold | T.C.A S.p.A | CID002580 | Conformant |
| Gold | REMONDIS PMR B.V. | CID002582 | Conformant |
| Gold | Fujairah Gold FZC | CID002584 | Outreach Required |
| Gold | Industrial Refining Company | CID002587 | Non Conformant |
| Gold | Shirpur Gold Refinery Ltd. | CID002588 | Outreach Required |
| Tungsten | Niagara Refining LLC | CID002589 | Conformant |
| Gold | Korea Zinc Co., Ltd. | CID002605 | Conformant |
| Gold | Marsam Metals | CID002606 | Non Conformant |
| Gold | TOO Tau-Ken-Altyn | CID002615 | Conformant |
| Tungsten | China Molybdenum Tungsten Co., Ltd. | CID002641 | Conformant |
| Tungsten | Ganzhou Haichuang Tungsten Co., Ltd. | CID002645 | Conformant |
| Tungsten | Hydrometallurg, JSC | CID002649 | RMI Due Diligence Review |
| Tin | PT Cipta Persada Mulia | CID002696 | Conformant |
| Tin | An Vinh Joint Stock Mineral Processing Company | CID002703 | Outreach Required |
| Tin | Resind Industria e Comercio Ltda. | CID002706 | Conformant |
| Tantalum | Resind Industria e Comercio Ltda. | CID002707 | Conformant |
| Gold | Abington Reldan Metals, LLC | CID002708 | Conformant |
| Tungsten | Unecha Refractory metals plant | CID002724 | Non Conformant |
| Gold | Shenzhen CuiLu Gold Co., Ltd. | CID002750 | Outreach Required |
| Tin | Super Ligas | CID002756 | Active |
| Gold | Albino Mountinho Lda. | CID002760 | Outreach Required |

| Gold | SAAMP | CID002761 | Conformant |
|----------|--|-----------|---|
| Gold | L'Orfebre S.A. | CID002762 | Conformant |
| Gold | 8853 S.p.A. | CID002763 | Non Conformant |
| Gold | Italpreziosi | CID002765 | Conformant |
| Tin | Aurubis Berango | CID002774 | Conformant |
| Tin | PT Bangka Prima Tin | CID002776 | Conformant |
| Gold | WIELAND Edelmetalle GmbH | CID002778 | Conformant |
| Gold | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH | CID002779 | Conformant |
| Tin | PT Sukses Inti Makmur | CID002816 | Conformant |
| Tungsten | Philippine Chuangxin Industrial Co., Inc. | CID002827 | Conformant |
| Tungsten | ACL Metais Eireli | CID002833 | Non Conformant |
| Tantalum | Jiangxi Tuohong New Raw Material | CID002842 | Conformant |
| Tungsten | Moliren Ltd. | CID002845 | RMI Due Diligence Review - Unable to Proceed |
| Gold | AU Traders and Refiners | CID002850 | Non Conformant |
| Gold | GGC Gujrat Gold Centre Pvt. Ltd. | CID002852 | Active |
| Gold | Sai Refinery | CID002853 | Outreach Required |
| Gold | Modeltech Sdn Bhd | CID002855 | Non Conformant |
| Tin | Modeltech Sdn Bhd | CID002858 | Non Conformant |
| | Bangalore Refinery | CID002858 | |
| Gold | | | Conformant |
| Gold | Kyshtym Copper-Electrolytic Plant ZAO | CID002865 | RMI Due Diligence Review - Unable to Proceed |
| Gold | Degussa Sonne / Mond Goldhandel GmbH | CID002867 | Outreach Required |
| Gold | Pease & Curren | CID002872 | Communication Suspended - Not Interested |
| Gold | JALAN & Company | CID002893 | Outreach Required |
| Gold | SungEel HiMetal Co., Ltd. | CID002918 | Conformant |
| Gold | Planta Recuperadora de Metales SpA | CID002919 | Conformant |
| Gold | ABC Refinery Pty Ltd. | CID002920 | Outreach Required |
| Gold | Safimet S.p.A | CID002973 | Non Conformant |
| Gold | State Research Institute Center for Physical Sciences and Technology | CID003153 | Outreach Required |
| Gold | African Gold Refinery | CID003185 | RMI Due Diligence Review - Unable to Proceed |
| Gold | Gold Coast Refinery | CID003186 | Outreach Required |
| Gold | NH Recytech Company | CID003189 | Conformant |
| Tin | PT Bangka Serumpun | CID003205 | Conformant |
| Tin | Pongpipat Company Limited | CID003208 | Outreach Required |
| Gold | QG Refining, LLC | CID003324 | Outreach Required |
| Tin | Tin Technology & Refining | CID003325 | Conformant |
| Gold | Dijllah Gold Refinery FZC | CID003348 | Outreach Required |
| Tin | Dongguan CiEXPO Environmental Engineering Co., Ltd. | CID003356 | Non Conformant |
| Tin | PT Rajawali Rimba Perkasa | CID003381 | Conformant |
| Gold | CGR Metalloys Pvt Ltd. | CID003382 | Outreach Required |
| Gold | Sovereign Metals | CID003383 | Outreach Required |
| Tin | Luna Smelter, Ltd. | CID003387 | Conformant |

| Tin | Yunnan Yunfan Non-ferrous Metals Co., Ltd. | CID003397 | Non Conformant |
|----------|---|-----------|---|
| Tungsten | Lianyou Metals Co., Ltd. | CID003407 | Conformant |
| Tungsten | JSC "Kirovgrad Hard Alloys Plant" | CID003408 | RMI Due Diligence Review - Unable to Proceed |
| Tin | Precious Minerals and Smelting Limited | CID003409 | Non Conformant |
| Tin | Gejiu City Fuxiang Industry and Trade Co., Ltd. | CID003410 | Outreach Required |
| Tungsten | NPP Tyazhmetprom LLC | CID003416 | RMI Due Diligence Review - Unable to Proceed |
| Tungsten | Hubei Green Tungsten Co., Ltd. | CID003417 | Conformant |
| Gold | C.I Metales Procesados Industriales SAS | CID003421 | Active |
| Gold | Eco-System Recycling Co., Ltd. North Plant | CID003424 | Conformant |
| Gold | Eco-System Recycling Co., Ltd. West Plant | CID003425 | Conformant |
| Tungsten | Albasteel Industria e Comercio de Ligas Para Fundicao Ltd. | CID003427 | Non Conformant |
| Tin | PT Mitra Sukses Globalindo | CID003449 | Conformant |
| Gold | Augmont Enterprises Private Limited | CID003461 | Active |
| Gold | Kundan Care Products Ltd. | CID003463 | In Communication |
| Tungsten | Cronimet Brasil Ltda | CID003468 | Conformant |
| Tin | CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda | CID003486 | Conformant |
| Gold | Emerald Jewel Industry India Limited (Unit 1) | CID003487 | In Communication |
| Gold | Emerald Jewel Industry India Limited (Unit 2) | CID003488 | In Communication |
| Gold | Emerald Jewel Industry India Limited (Unit 3) | CID003489 | In Communication |
| Gold | Emerald Jewel Industry India Limited (Unit 4) | CID003490 | In Communication |
| Gold | K.A. Rasmussen | CID003497 | Outreach Required |
| Gold | Alexy Metals | CID003500 | Conformant |
| Tin | CRM Synergies | CID003524 | Conformant |
| Gold | Sancus ZFS (L'Orfebre, SA) | CID003529 | Conformant |
| Gold | Sellem Industries Ltd. | CID003540 | Communication Suspended |
| | | | - Not Interested |
| Gold | MD Overseas | CID003548 | In Communication |
| Tungsten | Artek LLC | CID003553 | RMI Due Diligence Review - Unable to Proceed |
| Gold | Metallix Refining Inc. | CID003557 | In Communication |
| Gold | Metal Concentrators SA (Pty) Ltd. | CID003575 | Conformant |
| Tin | Fabrica Auricchio Industria e Comercio Ltda. | CID003582 | Conformant |
| Tantalum | RFH Yancheng Jinye New Material Technology Co., Ltd. | CID003583 | Conformant |
| Tungsten | Fujian Xinlu Tungsten Co., Ltd. | CID003609 | Conformant |
| Tungsten | OOO "Technolom" 2 | CID003612 | RMI Due Diligence Review - Unable to Proceed |
| Tungsten | OOO "Technolom" 1 | CID003614 | RMI Due Diligence Review - Unable to Proceed |
| Gold | WEEEREFINING | CID003615 | Active |
| Gold | Gold by Gold Colombia | CID003641 | Conformant |
| Tungsten | LLC Vostok | CID003643 | RMI Due Diligence Review - Unable to Proceed |
| Tungsten | YUDU ANSHENG TUNGSTEN CO., LTD. | CID003662 | Outreach Required |
| Gold | Dongwu Gold Group | CID003663 | Outreach Required |
| Tin | DS Myanmar | CID003831 | Conformant |

| Tin | PT Putera Sarana Shakti (PT PSS) | CID003868 | Conformant |
|----------|----------------------------------|-----------|-------------------|
| Tantalum | 5D Production OU | CID003926 | Outreach Required |
| Tungsten | HANNAE FOR T Co., Ltd. | CID003978 | Outreach Required |
| Tin | PT Rajehan Ariq | CID002593 | Conformant |
| Tungsten | DONGKUK INDUSTRIES CO., LTD. | CID004060 | In Communication |
| Gold | Coimpa Industrial LTDA | CID004010 | Active |

* The information in this column is based on smelter or refiner information made publicly available by RMI as of May 11, 2022. The terms used have the following meanings:

- "Conformant" means that a smelter or refiner participates in and has been listed as "Conformant" to the assessment protocols of the Responsible Minerals Assurance Process ("RMAP").
- "Non-Conformant" means that a smelter's or refiner's systems, processes and practices materially deviate from the requirements of the Standard, or the auditee refuses to participate in the assessment process or does not provide adequate access to facilities to complete the assessment.
- "Active" means that the facility is in one of the stages of the audit cycle, anywhere from completion of the necessary documents to scheduling the audit date to enacting corrective actions in the post-audit phase.
- "Not Enrolled" refers to smelters that are not currently participating in the RMAP. Included in this category are facilities that the RMI is currently reaching out to, those that are communicating with the RMI regarding participation in an audit, those that have refused to participate, and those that have not completed the mandatory annual re-audit and those that failed to meet the assessment protocols to pass as audit. The following sub-statuses roll up into the "Not Enrolled" category; "Communication Suspended Not Interested"; "Due Diligence Vetting Process"; "In Communication"; "Outreach Required"; and "RMI Due Diligence Review Unable to Proceed"



APPENDIX B - Countries of Origin

The information provided in this Appendix is based on the information collected from our suppliers and is provided in good faith. We will continue to update it as our due diligence process and third-party data evolves.

| Afghanistan |
|---|
| Ãland Islands |
| Albania |
| American Samoa |
| Andorra |
| Angola |
| Argentina |
| Armenia |
| Aruba |
| Australia |
| Austria |
| Azerbaijan |
| Bahamas |
| Barbados |
| Belarus |
| Belgium |
| Benin |
| Bermuda |
| Bolivia (Plurinational State of) |
| Brazil |
| Bulgaria |
| Burkina Faso |
| Burundi |
| Cambodia |
| Canada |
| Central African Republic |
| Chile |
| China |
| Colombia |
| Congo |
| Czechia |
| DRC or an adjoining country (Covered Countries) |
| Djibouti |
| Dominica |

| Dominican Republic |
|--------------------|
| Ecuador |
| Egypt |
| Eritrea |
| Estonia |
| Ethiopia |
| Finland |
| France |
| Georgia |
| Germany |
| Ghana |
| Guam |
| Guatemala |
| Guinea |
| Guyana |
| Honduras |
| Hong Kong |
| Hungary |
| India |
| Indonesia |
| Ireland |
| Israel |
| Italy |
| Japan |
| Jersey |
| Kazakhstan |
| Kenya |
| Korea, Republic Of |
| Kyrgyzstan |
| Liberia |
| Liechtenstein |
| Lithuania |
| Luxembourg |
| Madagascar |
| Malaysia |
| Mali |
| Mauritania |
| Mexico |
| Mongolia |

| Morocco |
|----------------------|
| Mozambique |
| |
| Myanmar Namibia |
| Netherlands |
| |
| New Zealand |
| Nicaragua |
| Niger |
| Nigeria |
| Norway |
| Panama |
| Papua New Guinea |
| Peru |
| Philippines |
| Poland |
| Portugal |
| Russian Federation |
| Rwanda |
| Samoa |
| Saudi Arabia |
| Senegal |
| Sierra Leone |
| Singapore |
| Slovakia |
| Slovenia |
| South Africa |
| South Sudan |
| Spain |
| Sudan |
| Suriname |
| Sweden |
| Switzerland |
| Taiwan |
| Tajikistan |
| Tanzania |
| Thailand |
| Turkey |
| Uganda |
| United Arab Emirates |
| United Kingdom |
| USA |
| Uzbekistan |
| Vietnam |
| Zambia |
| Zimbabwe |
| |