

---

---

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

**FORM SD  
SPECIALIZED DISCLOSURE REPORT**

**AudioCodes Ltd.**

(Exact name of registrant as specified in its charter)

**ISRAEL**

(State or other jurisdiction of  
incorporation or organization)

**0-30070**

(Commission file number)

6 Ofra Haza Street, Or Yehuda, Israel

(Address of principal executive offices)

Ofer Nimtsovich, 972-3-9764000

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

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

☒ Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period  
from January 1 to December 31, 2024.

---

---

---

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

This Specialized Disclosure Report on Form SD (this “Form SD”) of AudioCodes Ltd. (“AudioCodes,” “we,” “us,” or “our”) for the year ended December 31, 2024 is presented to comply with Rule 13p-1 under the Securities Exchange Act of 1934, as amended.

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

AudioCodes evaluated its current product lines and determined that certain products we manufacture or contract to manufacture contain tin, tungsten, tantalum and/or gold, which are defined as “conflict minerals” by the United States Securities and Exchange Commission, that are necessary to the functionality or production of our products. Accordingly, AudioCodes is filing this disclosure along with a Conflict Minerals Report to disclose the measures we have taken to determine the origin of the conflict minerals used in our products.

#### **Conflict Minerals Disclosure**

We undertook due diligence measures, including surveying our direct suppliers through an industry-standard survey template for conflict minerals, to try to determine the sources of these minerals, which we purchase through a complex supply chain. Currently, we do not have sufficient information from all our suppliers or other sources to determine the country of origin of the conflict minerals used in our products or identify the facilities used to process those conflict minerals.

A copy of our Conflict Minerals Report is filed as Exhibit 1.01 hereto. Our Conflict Minerals Report, as well as our Conflict Minerals Policy, are publicly available on our website at <https://www.audiocodes.com/corporate/audiocodes-going-sustainable> under the heading “Conflict Minerals”. Except as expressly provided herein, the information on, or that can be accessed through, our website is not part of (nor is it included in) this Form SD.

### **Item 1.02 Exhibit**

See Item 2.01 below.

## **Section 2 – Exhibits**

### **Item 2.01. Exhibits**

[Exhibit 1.01 - Conflict Minerals Report as required by Items 1.01 and 1.02 of this Form SD.](#)

---

## **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.

AUDIOCODES LTD.

By: /s/ Ofer Nimtsovich

Name: Ofer Nimtsovich

Title: Chief Operating Officer (COO)

May 21, 2025

---

**AudioCodes Ltd.**  
**Conflict Minerals Report**  
**For The Year Ended December 31, 2024**

**1. Introduction**

This is the Conflict Minerals Report (this “Report”) for AudioCodes Ltd. (herein referred to as “AudioCodes,” the “Company,” “we,” “us” or “our”) filed with the United States Securities and Exchange Commission (the “SEC”) pursuant to Rule 13p-1 under the Securities Exchange Act of 1934, as amended (the “Rule”), for the reporting period from January 1, 2024 to December 31, 2024. The Rule was adopted by the SEC to implement reporting and disclosure requirements related to conflict minerals as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, as amended. The Rule imposes certain reporting obligations on SEC registrants whose manufactured products contain conflict minerals which are necessary to the functionality or production of their products. “Conflict minerals” are defined as cassiterite, columbite-tantalite, gold, wolframite and their derivatives, which are limited to tin, tantalum, tungsten and gold for the purpose of this assessment.

If a registrant can establish that the conflict minerals in its products originated from sources other than the Democratic Republic of the Congo (the “DRC”) or an adjoining country (collectively, the “Covered Countries”), or from recycled and scrap sources, the registrant must submit a specialized disclosure report under Form SD that describes the steps that the registrant took to determine the origin of the conflict minerals in its products.

If a registrant has reason to believe that any of the conflict minerals in its supply chain may have originated in a Covered Country, or if the registrant is unable to determine the country of origin of those conflict minerals, then the registrant must exercise due diligence on the conflict minerals’ source and chain of custody, and the registrant must annually submit a Conflict Minerals Report to the SEC that includes a description of those due diligence measures.

This Report is not audited by an independent private sector auditor in reliance on recent SEC guidance to the effect that the requirement of such an audit has been stayed except if the registrant elects to describe its products as “DRC conflict-free” in its Conflicts Minerals Report.

---

## **2. Company Overview**

This Report has been prepared by AudioCodes. The information includes the activities of all of our majority-owned subsidiaries that are required to be consolidated.

AudioCodes designs, develops and sells advanced Voice over-IP (VoIP) and converged VoIP and data networking solutions, products and applications that facilitate secured, resilient and high-quality Unified Communications (UC) and Contact Center (CC) services whether deployed on-premises or delivered from the cloud. Providing IP Phones, Customer Premise Equipment (CPE), and cloud-based platforms and applications, our solutions and products are geared to meet the growing needs of enterprises and service providers realigning their operations towards the transition to All-IP networks and hosted business services. AudioCodes is a VoIP technology market leader focused on converged VoIP and data communications offering technology, products and solutions for Enterprise Unified Communications, contact centers, service provider business services, mobile VoIP and Cloud virtualized Data Centers. Our products are deployed globally in enterprise, service provider cloud networks. AudioCodes' products include IP phones, session border controllers (SBC), media gateways, Multi-Service Business Routers (MSBRs), residential gateways, media servers, mobile communications solutions, value added applications, life cycle management solutions and professional services. AudioCodes high definition (HD) VoIP technologies and products provide enhanced intelligibility and a better end user experience in emerging voice communications services.

## **3. Products Overview**

Our principal hardware product lines are essentially classified into the following categories: session border controllers, media gateways, multi-service business routers, IP phones, cloud connector appliances, survivable branch appliances, call recorders, fax servers and SOHO routers.

## **4. Supply Chain Overview**

Because our supply chain is complex, AudioCodes relies upon our suppliers to provide information with respect to the origin of the conflict minerals contained in components and materials supplied

to us, including sources of conflict minerals that are supplied to them from sub-tier suppliers. Our suppliers are expected to provide conflict minerals sourcing information to us pursuant to our Conflict Minerals Policy.

We have performed a comprehensive analysis of the components used in our products, and the role that suppliers play throughout our manufacturing and product delivery processes. We defined the scope of our conflict minerals due diligence by identifying and contacting our current suppliers that provide components or engage in manufacturing activities that are likely to contain conflict minerals. We adopted the standard Conflict Mineral Reporting Templates (“CMRT”) established by the Conflict Free Sourcing Initiative (the “CFSI”) and sent our conflict minerals due diligence communication survey to these suppliers.

With respect to the Organisation for Economic Cooperation and Development (“OECD”) requirement to strengthen engagement with suppliers, we have engaged a third-party data collection vendor to conduct, collect and archive suppliers’ responses. Feedback from this engagement has allowed us to render the conclusions and statements in this Report.

---



## **5. Reasonable Country of Origin Inquiry (“RCOI”) and RCOI Conclusion**

**5.1** We conducted an analysis of our products and found that “conflict minerals” (as defined under the Rule), including tin, tantalum, tungsten and gold, can be found in our products and are necessary to the functionality or production of those products. Therefore, we are subject to the reporting obligations of the Rule.

**5.2** A list of all the suppliers and manufacturers that AudioCodes contracts with during the period covered by this Report to purchase all the items used in constructing its products was prepared by our Purchasing Department. The list was then reviewed and non-relevant suppliers and manufacturers of items which definitively do not contain tin, tantalum, tungsten or gold were deleted. The final list was evaluated by our Purchasing Director and Quality Assurance & Environmental Management Manager.

**5.3** Due to the breadth and complexity of AudioCodes’ products and supply chain, it will take time for many of our suppliers to verify the origin of all conflict minerals. Using our supply chain due diligence processes and efforts, we hope to further develop transparency into our supply chain.

**5.4** Steps conducted this year include:

- a. Performing internal applicability assessments of products and suppliers to determine which products and/or suppliers actually contain (or may contain) necessary conflict minerals.
- b. Supplier engagement:
  - Solicitation of survey responses from specified suppliers;
  - Assessment of suppliers’ responses, including identifying inconsistent, incomplete or inaccurate responses;

- Engaging our Purchasing Department to directly contact and make follow-up inquiries of non-responsive suppliers; and
  - As part of our validation process, circulation of training materials to suppliers, including an overview of the law and instructions on how to complete the CMRT, if relevant.
- c. As part of our effort to identify smelters and refiners, suppliers were requested to complete CMRTs template of version 6.01 or above.
-

**5.5** Currently, we do not have sufficient information from our suppliers to determine the country of origin of all the conflict minerals used in our products or the facilities used to process those conflict minerals. Therefore, we cannot exclude the possibility that some of these conflict minerals may have originated in the DRC or an adjoining country, and are not from recycled or scrap sources. Based on this result, AudioCodes conducted due diligence activities on the conflict minerals' source and chain of custody and have described these activities in this Report.

## **6. Due Diligence Design**

**6.1** Our due diligence processes and efforts have been developed in conjunction with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the "OECD Guidance") and the related supplements for gold, tin, tantalum and tungsten.

## **7. Due Diligence Performed**

### **7.1 Establish Strong Company Management Systems**

#### **7.1.1 Conflict Minerals Policy**

AudioCodes is committed to working collaboratively with our global supply chain to ensure compliance with the SEC's conflict minerals rules (including the Rule). Our conflict minerals policy is publicly available on our website at <https://www.audiocodes.com/corporate/audiocodes-going-sustainable> under the heading "Conflict Minerals Act". Except as expressly provided herein, the information on, or that can be accessed through, our website is not part of (nor is it included in) this Report.

#### **7.1.2 Internal Team**

AudioCodes has established a task force with representatives from our Legal, Finance, Purchasing and Quality departments to implement our conflict minerals compliance policy. Senior management is briefed about the results of our due diligence efforts on a regular basis.

### **7.1.3 Control Systems**

AudioCodes has established our due diligence compliance process and set forth documentation and record maintenance mechanisms to ensure the retention of relevant documentation in a structured electronic database. Database content enables real-time identification of all countries of origin of the minerals as well as the status of smelters and refiners. Since our databases are regularly backed up, this data retention ensures availability with no significant time limitation.

Company-level CMRT are amended by AudioCodes on a monthly basis, as our sub-contractor collects new and/or corrected suppliers' reports. AudioCodes makes its latest company-level CMRT available to its customers upon request.

---

#### **7.1.4 Supplier Engagement**

AudioCodes' Requirements from AudioCodes' Suppliers Process Specification (P-08-03E) (the "Process Specification") includes a paragraph detailing our mandatory requirement to comply with the Rule and to strictly follow the framework established by the OECD. The Process Specification is referenced in each purchase order issued to our suppliers. Except as expressly provided herein, the information on, or that can be accessed through, our website is not part of (nor is it included in) this Report.

#### **7.1.5 Grievance Mechanism**

Grievance mechanism & reporting are defined in our Conflict Minerals Policy.

### **7.2 Identify and Assess Risk in the Supply Chain**

**7.2.1** As part of our risk-based approach, AudioCodes identified the suppliers from which it made purchases over a specified amount during the year ended 2024. While trying to move towards the goal of being a conflict minerals-free company, we assessed two primary risks in our supply chain: (1) the risk of not receiving prompt and accurate information from a particular supplier; and (2) the risk of not being able to readily replace a particular supplier. The result was the segmentation of our suppliers into three categories/levels of risks—"high", "medium" and "low"—enabling the Company to focus and tailor its risk mitigation efforts according to the supplier's level of risk.

**7.2.2** Our Purchasing Department was engaged to urge and make follow-up inquiries of reluctant suppliers and to focus our escalation efforts, with a priority on the "high" risk suppliers.

**7.2.3** To the best of our knowledge and efforts, we have identified most of the smelters and refiners in our supply chain.

### **7.3 Design and Implement Strategy to Respond to Risks**

- 7.3.1** Suppliers are requested to supply their conflict minerals compliance declarations using the CMRT template. Such declarations are reviewed by AudioCodes (or its assigned sub-contractor) and verified for completeness and inconsistencies.
- 7.3.2** Any declaration determined to be inconsistent or missing data is returned to the supplier to be corrected and completed.
- 7.3.3** We also track smelters and refiners that have not received a conflict-free designation based on the CFSI/CFSP or other independent third-party validation program, and compare smelters and refiners identified by the supply chain survey against the list of facilities that have received a “conflict free” designation.
-

**7.3.4** Red flags analysis on the topics listed below were defined to better identify suspicious behavior and activities:

- a. Data completion;
- b. Locations of mineral origin; and
- c. Existence of Company Policy.

**7.3.5** Our escalation process was documented and implemented, which defines how to address non-responsive and problematic suppliers. The escalation process defines the conditions under which our Purchasing Department should ultimately consider suspending or discontinuing engagement with such suppliers.

**7.3.6** Our VP, Operations, was informed of (i) the risk analysis efforts and results and (ii) the actions taken in response to such analysis and results.

**7.4 Carrying Out of Independent Third-Party Audit of Supply Chain Due Diligence at Identified Points in the Supply Chain**

**7.4.1** AudioCodes does not have a direct relationship with smelters and refiners of conflict minerals, nor do we perform direct audits of these entities that provide our supply chain with conflict minerals. However, we do rely upon the industry efforts and tools (for example, the CFSI CMRT) in our evaluations.

**7.5 Report Annually on Supply Chain Due Diligence**

**7.5.1** AudioCodes' CMRT is amended on a monthly basis and is available to all requestors. The Company's annual Conflict Minerals Report is made available on AudioCodes' website at <https://www.audiocodes.com/corporate/audiocodes-going-sustainable> under the heading "Conflict Minerals Act" and filed with the SEC on Form SD. Except as expressly provided herein, the information on, or that can be accessed through, our website is not part of (nor is it included in) this Report.

## **8. Results of Assessments**

### **8.1 Survey Responses**

**8.1.1** Because of our size, the breadth and complexity of our products, and constant changes to our supply chain in the ordinary course of business, it is difficult to identify entities downstream from our direct suppliers. We therefore rely on our direct suppliers to provide us with information about the source of conflict minerals contained in the components supplied to us. Our direct suppliers are similarly reliant upon information provided by their suppliers.

**8.1.2** Despite receiving responses from suppliers listing the smelter's or refiner's names in their supply chain, a few suppliers were unable to accurately report which specific smelters were part of the supply chain of the components that were sold to AudioCodes in the year ended 2024. Therefore, we are not able to determine the facilities that processed the conflict minerals in such products.

---



**8.1.3** We received responses from 100% of the suppliers we surveyed. We reviewed the responses against criteria we developed to determine which responses necessitated further engagement with such suppliers. These criteria included untimely or incomplete responses, as well as inconsistencies within the data reported in the template. We are collaborating directly with these suppliers to have them provide updated responses.

**8.1.4** Most CMRTs were reported at the company level (see the table immediately below):

| <b>Declaration Scopes of Delivered Consolidated Manufacturers</b> |     |
|---|-----|
| Reported at company level   | 61% |
| Reported user defined   | 16% |
| Reported product list/product                                     | 23% |

**8.1.5** As of the date hereof, the responses received from our suppliers can be further categorized as described in the table immediately below. CMRTs with major issues are CMRTs with (i) significant incompleteness, (ii) inaccuracies or (iii) contradictory information submitted. For example, tantalum, tin, gold or tungsten were declared used, but no smelters were entered for these metals.

| <b>Consolidated Manufacturers Sub-Collection Status</b> |      |
|---|------|
| MFRs delivered satisfactory CMRT                        | 100% |
| MFRs delivered CMRT with major issues                   | 0%   |
| MFRs whose CMRT was escalated*                          | 0%   |
| MFRs still in process                                   | 0%   |

\* Manufacturer (“MFR”) with at least one or multiple escalations (but no major issues noted). Escalated by the subcontractor to AudioCodes to supply enhanced/corrected contact information, to contact the MFR directly or otherwise, due to the MFR’s poor responsiveness.

**8.1.6** The smelter analysis of the responsive MFR is set forth below. The list of smelters is set forth in Appendix A attached hereto. The list of the countries of origin of mines is set forth in Appendix B attached hereto.

| <b>Smelters Analysis</b>   |     |
|--|-----|
| With certification   |     |
| Certified smelters - CFSP/RJC/LBMA/DMCC <sup>(1)</sup>                             | 59% |
| Non-certified smelters - CFSP/RJC/LBMA/DMCC <sup>(1)</sup>                         | 41% |
| Legitimacy of smelters (out of the total number of smelters analyzed)              |     |
| Number of alleged smelters-<br>FSI/RJC/LBMA/DMCC/DOC/APPLE/INTEL/GS <sup>(1)</sup> | 88% |
| Unknown smelters   | 12% |

(1) Initials of credible sources for conflict minerals information (organizations or company names).

---

**8.1.7** Based on the information obtained through the due diligence process, AudioCodes does not have sufficient information as of the date hereof to determine the country of origin of all the conflict minerals contained in our products.

**8.1.8** The majority of the responses we received provided data at a company or divisional level or, as described above, were unable to specify the smelters or refiners used for components supplied to AudioCodes. We are therefore unable to determine whether any of the conflict minerals reported by the suppliers were contained in components or parts supplied to us, or to validate that any of these smelters or refiners are actually within our supply chain.

**8.1.9** We do not gather information from our suppliers on a continuous, real-time basis.

**8.1.10** The Company can only provide reasonable, but not absolute, assurances regarding the source and chain of custody of the necessary conflict minerals, since the information is obtained from direct and secondary suppliers and independent third-party audit programs.

## **8.2 Efforts to Determine Country of Origin of Mine or Conflict Minerals**

**8.2.1** Tracing materials back to their mine of origin is a complex aspect of responsible sourcing in our supply chain. By adopting a methodology based on the OECD Guidance and the CFSI template, we have determined that the information we gathered from the smelters and refiners in our supply chain represents the most reasonable known mine of origin information available to us.

## **9. Continuous Improvement Efforts to Mitigate Risks**

**9.1** AudioCodes will continue working with its global supply chain to ensure responsible sourcing and compliance with international regulations.

**9.2** AudioCodes will strengthen communications with suppliers in order to improve the number of suppliers that respond to the company's supply chain surveys.

**9.3** AudioCodes will analyze its database and sort out all non-active parts, to focus on an accurate suppliers' database.

## **10. Cautionary Statement Concerning Forward-Looking Statements**

This Report contains “forward-looking statements” within the meaning of U.S. federal securities laws. These forward-looking statements can generally be identified as such because the context of the statement will include words such as “may,” “will,” “intends,” “plans,” “believes,” “anticipates,” “expects,” “estimates,” “predicts,” “potential,” “continue,” or “opportunity,” the negative of these words or words of similar import. Examples of forward-looking statements include, but are not limited to, statements relating to our future plans, and any other statement that does not directly relate to any historical or current fact. Forward-looking statements are based on our current expectations and assumptions, which may not prove to be accurate. Forward-looking statements are subject to risks, uncertainties and other factors that could cause actual results to differ substantially and materially from those stated in such statements, including, but not limited to, the risks described in our Form 20-F and other filings we make with the SEC from time to time. As a result, these statements speak only as of the date they are made and we undertake no obligation to update or revise any forward-looking statement, except as required by U.S. federal securities laws. AudioCodes may not update these forward-looking statements, even if its situation changes in the future. AudioCodes’ management cautions against putting undue reliance on forward-looking statements or projecting any future results based on such statements or present or prior earnings levels.

---

## Appendix A: Smelters List

### 1. GOLD

| <b>Met<br/>al</b> | <b>Smelter Name</b>                                | <b>Country</b>              |
|-------------------|--|-----------------------------|
| Gold              | 8853 S.p.A.  | ITALY                       |
| Gold              | ABC Refinery Pty Ltd.                              | AUSTRALIA                   |
| Gold              | Abington Reldan Metals, LLC                        | UNITED STATES OF<br>AMERICA |
| Gold              | Advanced Chemical Company                          | UNITED STATES OF<br>AMERICA |
| Gold              | Agosi AG   | GERMANY                     |
| Gold              | Aida Chemical Industries Co., Ltd.                 | JAPAN                       |
| Gold              | Al Etihad Gold Refinery DMCC                       | UNITED ARAB EMIRATES        |
| Gold              | Albino Mountinho Lda.                              | PORTUGAL                    |
| Gold              | Alexy Metals                                       | UNITED STATES OF<br>AMERICA |
| Gold              | Almalyk Mining and Metallurgical Complex<br>(AMMC) | UZBEKISTAN                  |
| Gold              | AngloGold Ashanti Corrego do Sitio Mineracao       | BRAZIL                      |
| Gold              | Argor-Heraeus S.A.                                 | SWITZERLAND                 |
| Gold              | Asahi Pretec Corp.                                 | JAPAN                       |
| Gold              | Asahi Refining Canada Ltd.                         | CANADA                      |
| Gold              | Asahi Refining USA Inc.                            | UNITED STATES OF<br>AMERICA |
| Gold              | Asaka Riken Co., Ltd.                              | JAPAN                       |
| Gold              | Atasay Kuyumculuk Sanayi Ve Ticaret A.S.           | TURKEY                      |
| Gold              | Attero Recycling Pvt Ltd                           | INDIA                       |
| Gold              | AU Traders and Refiners                            | SOUTH AFRICA                |

| <b>Met<br/>al</b> | <b>Smelter Name</b>   | <b>Country</b> |
|-------------------|---|----------------|
| Gold              | Augmont Enterprises Private Limited                           | INDIA          |
| Gold              | Aurubis AG  | GERMANY        |
| Gold              | Bangalore Refinery  | INDIA          |
| Gold              | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | PHILIPPINES    |
| Gold              | Boliden Ronnskar  | SWEDEN         |
| Gold              | C. Hafner GmbH + Co. KG                                       | GERMANY        |
| Gold              | Caridad   | MEXICO         |
| Gold              | CCR Refinery - Glencore Canada Corporation                    | CANADA         |
| Gold              | Cendres + Metaux S.A.   | SWITZERLAND    |
| Gold              | CGR Metalloys Pvt Ltd.  | INDIA          |
| Gold              | Chimet S.p.A.   | ITALY          |
| Gold              | Chugai Mining   | JAPAN          |
| Gold              | Coimpa Industrial LTDA  | BRAZIL         |
| Gold              | Daye Non-Ferrous Metals Mining Ltd.                           | CHINA          |
| Gold              | Degussa Sonne / Mond Goldhandel GmbH                          | GERMANY        |

|          |   |                              |
|----------|---|------------------------------|
| Gol<br>d | Dijllah Gold Refinery FZC                     | UNITED ARAB EMIRATES         |
| Gol<br>d | Dongwu Gold Group                             | CHINA                        |
| Gol<br>d | Dowa  | JAPAN                        |
| Gol<br>d | DSC (Do Sung Corporation)                     | KOREA, REPUBLIC OF           |
| Gol<br>d | Eco-System Recycling Co., Ltd. East Plant     | JAPAN                        |
| Gol<br>d | Eco-System Recycling Co., Ltd. North Plant    | JAPAN                        |
| Gol<br>d | Eco-System Recycling Co., Ltd. West Plant     | JAPAN                        |
| Gol<br>d | Elite Industech Co., Ltd.                     | TAIWAN, PROVINCE OF<br>CHINA |
| Gol<br>d | Emerald Jewel Industry India Limited (Unit 1) | INDIA                        |
| Gol<br>d | Emerald Jewel Industry India Limited (Unit 2) | INDIA                        |
| Gol<br>d | Emerald Jewel Industry India Limited (Unit 3) | INDIA                        |
| Gol<br>d | Emerald Jewel Industry India Limited (Unit 4) | INDIA                        |
| Gol<br>d | Emirates Gold DMCC                            | UNITED ARAB EMIRATES         |
| Gol<br>d | Fidelity Printers and Refiners Ltd.           | ZIMBABWE                     |
| Gol<br>d | Fujairah Gold FZC                             | UNITED ARAB EMIRATES         |

|          |  |                                 |
|----------|--|---------------------------------|
| Gol<br>d | GG Refinery Ltd.   | TANZANIA, UNITED<br>REPUBLIC OF |
| Gol<br>d | GGC Gujrat Gold Centre Pvt. Ltd.                           | INDIA                           |
| Gol<br>d | Gold by Gold Colombia                                      | COLOMBIA                        |
| Gol<br>d | Gold Coast Refinery  | GHANA                           |
| Gol<br>d | Great Wall Precious Metals Co., Ltd. of CBPM               | CHINA                           |
| Gol<br>d | Guangdong Jinding Gold Limited                             | CHINA                           |
| Gol<br>d | Guoda Safina High-Tech Environmental Refinery<br>Co., Ltd. | CHINA                           |
| Gol<br>d | Hangzhou Fuchunjiang Smelting Co., Ltd.                    | CHINA                           |
| Gol<br>d | Heimerle + Meule GmbH                                      | GERMANY                         |
| Gol<br>d | Heraeus Germany GmbH Co. KG                                | GERMANY                         |
| Gol<br>d | Heraeus Metals Hong Kong Ltd.                              | CHINA                           |
| Gol<br>d | Hunan Chenzhou Mining Co., Ltd.                            | CHINA                           |
| Gol<br>d | Hunan Guiyang yinxing Nonferrous Smelting<br>Co., Ltd.     | CHINA                           |
| Gol<br>d | HwaSeong CJ Co., Ltd.                                      | KOREA, REPUBLIC OF              |
| Gol<br>d | Impala Refineries – Base Metals Refinery (BMR)             | SOUTH AFRICA                    |
| Gol<br>d | Impala Refineries – Platinum Metals Refinery (PMR)         | SOUTH AFRICA                    |
| Gol<br>d | Impala Rustenburg  | SOUTH AFRICA                    |



|          |  |                      |
|----------|--|----------------------|
| Gol<br>d | Inca One (Chala One Plant)   | PERU                 |
| Gol<br>d | Inca One (Koricancha Plant)  | PERU                 |
| Gol<br>d | Industrial Refining Company  | BELGIUM              |
| Gol<br>d | Inner Mongolia Qiankun Gold and Silver Refinery<br>Share Co., Ltd. | CHINA                |
| Gol<br>d | International Precious Metal Refiners                              | UNITED ARAB EMIRATES |
| Gol<br>d | Ishifuku Metal Industry Co., Ltd.                                  | JAPAN                |
| Gol<br>d | Istanbul Gold Refinery   | TURKEY               |
| Gol<br>d | Italpreziosi   | ITALY                |
| Gol<br>d | JALAN & Company  | INDIA                |

---

|      |  |                          |
|------|--|--------------------------|
| Gold | Japan Mint                                   | JAPAN                    |
| Gold | Jiangxi Copper Co., Ltd.                     | CHINA                    |
| Gold | JX Nippon Mining & Metals Co., Ltd.          | JAPAN                    |
| Gold | K.A. Rasmussen                               | NORWAY                   |
| Gold | Kaloti Precious Metals                       | UNITED ARAB EMIRATES     |
| Gold | Kazakhmys Smelting LLC                       | KAZAKHSTAN               |
| Gold | Kazzinc                                      | KAZAKHSTAN               |
| Gold | Kennecott Utah Copper LLC                    | UNITED STATES OF AMERICA |
| Gold | KGHM Polska Miedz Spolka Akcyjna             | POLAND                   |
| Gold | Kojima Chemicals Co., Ltd.                   | JAPAN                    |
| Gold | Korea Zinc Co., Ltd.                         | KOREA, REPUBLIC OF       |
| Gold | Kundan Care Products Ltd.                    | INDIA                    |
| Gold | Kyrgyzaltyn JSC                              | KYRGYZSTAN               |
| Gold | L'azurde Company For Jewelry                 | SAUDI ARABIA             |
| Gold | Lingbao Gold Co., Ltd.                       | CHINA                    |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd.   | CHINA                    |
| Gold | L'Orfebre S.A.                               | ANDORRA                  |
| Gold | LS MnM Inc.                                  | KOREA, REPUBLIC OF       |
| Gold | LT Metal Ltd.                                | KOREA, REPUBLIC OF       |
| Gold | Luoyang Zijin Yinhui Gold Refinery Co., Ltd. | CHINA                    |
| Gold | Marsam Metals                                | BRAZIL                   |
| Gold | Materion                                     | UNITED STATES OF AMERICA |
| Gold | Matsuda Sangyo Co., Ltd.                     | JAPAN                    |
| Gold | MD Overseas                                  | INDIA                    |
| Gold | Metal Concentrators SA (Pty) Ltd.            | SOUTH AFRICA             |
| Gold | Metallix Refining Inc.                       | UNITED STATES OF AMERICA |
| Gold | Metalor Technologies (Hong Kong) Ltd.        | CHINA                    |
| Gold | Metalor Technologies (Singapore) Pte., Ltd.  | SINGAPORE                |
| Gold | Metalor Technologies (Suzhou) Ltd.           | CHINA                    |
| Gold | Metalor Technologies S.A.                    | SWITZERLAND              |

|      |  |                          |
|------|--|--------------------------|
| Gold | Metalor USA Refining Corporation         | UNITED STATES OF AMERICA |
| Gold | Metalurgica Met-Mex Penoles S.A. De C.V. | MEXICO                   |
| Gold | Mitsubishi Materials Corporation         | JAPAN                    |
| Gold | Mitsui Mining and Smelting Co., Ltd.     | JAPAN                    |
| Gold | MKS PAMP SA                              | SWITZERLAND              |
| Gold | MMTC-PAMP India Pvt., Ltd.               | INDIA                    |
| Gold | Modeltech Sdn Bhd                        | MALAYSIA                 |
| Gold | Morris and Watson                        | NEW ZEALAND              |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.S.   | TURKEY                   |
| Gold | Navoi Mining and Metallurgical Combinat  | UZBEKISTAN               |
| Gold | NH Recytech Company                      | KOREA, REPUBLIC OF       |

---

|          |   |                          |
|----------|---|--------------------------|
| Gol<br>d | Nihon Material Co., Ltd.                                    | JAPAN                    |
| Gol<br>d | Ogussa Österreichische Gold- und Silber-Scheideanstalt GmbH | AUSTRIA                  |
| Gol<br>d | Ohura Precious Metal Industry Co., Ltd.                     | JAPAN                    |
| Gol<br>d | Pease & Curren  | UNITED STATES OF AMERICA |
| Gol<br>d | Penglai Penggang Gold Industry Co., Ltd.                    | CHINA                    |
| Gol<br>d | Planta Recuperadora de Metales SpA                          | CHILE                    |
| Gol<br>d | PT Aneka Tambang (Persero) Tbk                              | INDONESIA                |
| Gol<br>d | PX Precinox S.A.  | SWITZERLAND              |
| Gol<br>d | QG Refining, LLC  | UNITED STATES OF AMERICA |
| Gol<br>d | Rand Refinery (Pty) Ltd.                                    | SOUTH AFRICA             |
| Gol<br>d | Refinery of Seemine Gold Co., Ltd.                          | CHINA                    |
| Gol<br>d | REMONDIS PMR B.V.   | NETHERLANDS              |
| Gol<br>d | Royal Canadian Mint   | CANADA                   |
| Gol<br>d | SAAMP   | FRANCE                   |
| Gol<br>d | Sabin Metal Corp.   | UNITED STATES OF AMERICA |

|          |  |                              |
|----------|--|------------------------------|
| Gol<br>d | Safimet S.p.A  | ITALY                        |
| Gol<br>d | Safina a.s.  | CZECHIA                      |
| Gol<br>d | Sai Refinery   | INDIA                        |
| Gol<br>d | Sam Precious Metals  | UNITED ARAB<br>EMIRATES      |
| Gol<br>d | Samduck Precious Metals  | KOREA, REPUBLIC OF           |
| Gol<br>d | SAMWON METALS Corp.  | KOREA, REPUBLIC OF           |
| Gol<br>d | SEMPSA Joyeria Plateria S.A.                                       | SPAIN                        |
| Gol<br>d | Shandong gold smelting Co., Ltd.                                   | CHINA                        |
| Gol<br>d | Shandong Humon Smelting Co., Ltd.                                  | CHINA                        |
| Gol<br>d | Shandong Tiancheng Biological Gold Industrial<br>Co., Ltd.         | CHINA                        |
| Gol<br>d | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.                  | CHINA                        |
| Gol<br>d | Shenzhen CuiLu Gold Co., Ltd.                                      | CHINA                        |
| Gol<br>d | SHENZHEN JINJUNWEI RESOURCE<br>COMPREHENSIVE DEVELOPMENT CO., LTD. | CHINA                        |
| Gol<br>d | Shenzhen Zhonghenglong Real Industry Co., Ltd.                     | CHINA                        |
| Gol<br>d | Shirpur Gold Refinery Ltd.   | INDIA                        |
| Gol<br>d | Sichuan Tianze Precious Metals Co., Ltd.                           | CHINA                        |
| Gol<br>d | Singway Technology Co., Ltd.                                       | TAIWAN, PROVINCE OF<br>CHINA |

|          |   |                              |
|----------|---|------------------------------|
| Gol<br>d | Solar Applied Materials Technology Corp.                                | TAIWAN, PROVINCE OF<br>CHINA |
| Gol<br>d | Sovereign Metals  | INDIA                        |
| Gol<br>d | State Research Institute Center for Physical Sciences<br>and Technology | LITHUANIA                    |
| Gol<br>d | Sudan Gold Refinery   | SUDAN                        |
| Gol<br>d | Sumitomo Metal Mining Co., Ltd.   | JAPAN                        |
| Gol<br>d | SungEel HiMetal Co., Ltd.   | KOREA, REPUBLIC OF           |
| Gol<br>d | Super Dragon Technology Co., Ltd.                                       | TAIWAN, PROVINCE OF<br>CHINA |
| Gol<br>d | T.C.A S.p.A   | ITALY                        |

---

|          |   |                          |
|----------|---|--------------------------|
| Gol<br>d | Tanaka Kikinzoku Kogyo K.K.                         | JAPAN                    |
| Gol<br>d | Tokuriki Honten Co., Ltd.                           | JAPAN                    |
| Gol<br>d | Tongling Nonferrous Metals Group Co., Ltd.          | CHINA                    |
| Gol<br>d | TOO Tau-Ken-Altyn                                   | KAZAKHSTAN               |
| Gol<br>d | Torecom   | KOREA, REPUBLIC OF       |
| Gol<br>d | Umicore Precious Metals Thailand                    | THAILAND                 |
| Gol<br>d | Umicore S.A. Business Unit Precious Metals Refining | BELGIUM                  |
| Gol<br>d | United Precious Metal Refining, Inc.                | UNITED STATES OF AMERICA |
| Gol<br>d | Valcambi S.A.                                       | SWITZERLAND              |
| Gol<br>d | WEEEREFINING  | FRANCE                   |
| Gol<br>d | Western Australian Mint (T/a The Perth Mint)        | AUSTRALIA                |
| Gol<br>d | WIELAND Edelmetalle GmbH                            | GERMANY                  |
| Gol<br>d | Yamakin Co., Ltd.                                   | JAPAN                    |
| Gol<br>d | Yokohama Metal Co., Ltd.                            | JAPAN                    |
| Gol<br>d | Yunnan Copper Industry Co., Ltd.                    | CHINA                    |

|          |  |       |
|----------|--|-------|
| Gol<br>d | Zhongyuan Gold Smelter of Zhongjin Gold<br>Corporation | CHINA |
|----------|--|-------|

---



## 2. TANTALUM

| <b>Metal</b> | <b>Smelter Name</b>                               | <b>Country</b>           |
|--------------|---|--------------------------|
| Tantalum     | 5D Production OU                                  | ESTONIA                  |
| Tantalum     | AMG Brasil  | BRAZIL                   |
| Tantalum     | D Block Metals, LLC                               | UNITED STATES OF AMERICA |
| Tantalum     | F&X Electro-Materials Ltd.                        | CHINA                    |
| Tantalum     | FIR Metals & Resource Ltd.                        | CHINA                    |
| Tantalum     | Global Advanced Metals Aizu                       | JAPAN                    |
| Tantalum     | Global Advanced Metals Boyertown                  | UNITED STATES OF AMERICA |
| Tantalum     | Guangdong Rising Rare Metals-EO Materials Ltd.    | CHINA                    |
| Tantalum     | Hengyang King Xing Lifeng New Materials Co., Ltd. | CHINA                    |
| Tantalum     | Jiangxi Dinghai Tantalum & Niobium Co., Ltd.      | CHINA                    |
| Tantalum     | Jiangxi Tuohong New Raw Material                  | CHINA                    |
| Tantalum     | JiuJiang JinXin Nonferrous Metals Co., Ltd.       | CHINA                    |
| Tantalum     | Jiujiang Tanbre Co., Ltd.                         | CHINA                    |
| Tantalum     | Jiujiang Zhongao Tantalum & Niobium Co., Ltd.     | CHINA                    |

|          |  |                          |
|----------|--|--------------------------|
| Tantalum | KEMET de Mexico                                      | MEXICO                   |
| Tantalum | Materion Newton Inc.                                 | UNITED STATES OF AMERICA |
| Tantalum | Metallurgical Products India Pvt., Ltd.              | INDIA                    |
| Tantalum | Mineracao Taboca S.A.                                | BRAZIL                   |
| Tantalum | Mitsui Mining and Smelting Co., Ltd.                 | JAPAN                    |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd.           | CHINA                    |
| Tantalum | NPM Silmet AS  | ESTONIA                  |
| Tantalum | PowerX Ltd.  | RWANDA                   |
| Tantalum | QuantumClean   | UNITED STATES OF AMERICA |
| Tantalum | Resind Industria e Comercio Ltda.                    | BRAZIL                   |
| Tantalum | RFH Yancheng JinYE New Material Technology Co., Ltd. | CHINA                    |
| Tantalum | Taki Chemical Co., Ltd.                              | JAPAN                    |
| Tantalum | TANIOBIS Co., Ltd.                                   | THAILAND                 |
| Tantalum | TANIOBIS GmbH  | GERMANY                  |
| Tantalum | TANIOBIS Japan Co., Ltd.                             | JAPAN                    |
| Tantalum | TANIOBIS Smelting GmbH & Co. KG                      | GERMANY                  |
| Tantalum | Telex Metals   | UNITED STATES OF AMERICA |

|          |   |            |
|----------|---|------------|
| Tantalum | Ulba Metallurgical Plant JSC                  | KAZAKHSTAN |
| Tantalum | XIMEI RESOURCES (GUANGDONG) LIMITED           | CHINA      |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd. | CHINA      |
| Tantalum | Yanling Jincheng Tantalum & Niobium Co., Ltd. | CHINA      |

---

### 3. TIN

| <b>Metal</b> | <b>Smelter Name</b>   | <b>Country</b>                      |
|--------------|---|-------------------------------------|
| Tin          | Alpha   | UNITED STATES OF AMERICA            |
| Tin          | An Vinh Joint Stock Mineral Processing Company  | VIETNAM                             |
| Tin          | Aurubis Beerse  | BELGIUM                             |
| Tin          | Aurubis Berango   | SPAIN                               |
| Tin          | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.                                     | CHINA                               |
| Tin          | Chifeng Dajingzi Tin Industry Co., Ltd.   | CHINA                               |
| Tin          | China Tin Group Co., Ltd.   | CHINA                               |
| Tin          | CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda          | BRAZIL                              |
| Tin          | CRM Synergies   | SPAIN                               |
| Tin          | CV Ayi Jaya   | INDONESIA                           |
| Tin          | CV Venus Inti Perkasa   | INDONESIA                           |
| Tin          | Dongguan CiEXPO Environmental Engineering Co., Ltd.                                   | CHINA                               |
| Tin          | Dowa  | JAPAN                               |
| Tin          | DS Myanmar  | MYANMAR                             |
| Tin          | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | VIETNAM                             |
| Tin          | EM Vinto  | BOLIVIA<br>(PLURINATIONAL STATE OF) |
| Tin          | Estanho de Rondonia S.A.  | BRAZIL                              |
| Tin          | Fabrica Auricchio Industria e Comercio Ltda.  | BRAZIL                              |
| Tin          | Fenix Metals  | POLAND                              |
| Tin          | Gejiu City Fuxiang Industry and Trade Co., Ltd.                                       | CHINA                               |
| Tin          | Gejiu Kai Meng Industry and Trade LLC   | CHINA                               |

|     |   |                             |
|-----|---|-----------------------------|
| Tin | Gejiu Non-Ferrous Metal Processing Co., Ltd.      | CHINA                       |
| Tin | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.    | CHINA                       |
| Tin | Gejiu Zili Mining And Metallurgy Co., Ltd.        | CHINA                       |
| Tin | Global Advanced Metals Greenbushes Pty Ltd.       | AUSTRALIA                   |
| Tin | Guangdong Hanhe Non-Ferrous Metal Co., Ltd.       | CHINA                       |
| Tin | HuiChang Hill Tin Industry Co., Ltd.              | CHINA                       |
| Tin | Jiangxi New Nanshan Technology Ltd.               | CHINA                       |
| Tin | Luna Smelter, Ltd.                                | RWANDA                      |
| Tin | Ma'anshan Weitai Tin Co., Ltd.                    | CHINA                       |
| Tin | Magnu's Minerais Metais e Ligas Ltda.             | BRAZIL                      |
| Tin | Malaysia Smelting Corporation (MSC)               | MALAYSIA                    |
| Tin | Malaysia Smelting Corporation Berhad (Port Klang) | MALAYSIA                    |
| Tin | Melt Metais e Ligas S.A.                          | BRAZIL                      |
| Tin | Metallic Resources, Inc.                          | UNITED STATES OF<br>AMERICA |
| Tin | Mineracao Taboca S.A.                             | BRAZIL                      |

---

|     |  |  |
|-----|--|--|
| Tin | Mining Minerals Resources SARL                   | CONGO, DEMOCRATIC<br>REPUBLIC OF THE   |
| Tin | Minsur   | PERU                                   |
| Tin | Mitsubishi Materials Corporation                 | JAPAN                                  |
| Tin | Modeltech Sdn Bhd                                | MALAYSIA                               |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company | VIETNAM                                |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd.          | THAILAND                               |
| Tin | O.M. Manufacturing Philippines, Inc.             | PHILIPPINES                            |
| Tin | Operaciones Metalurgicas S.A.                    | BOLIVIA<br>(PLURINATIONAL<br>STATE OF) |
| Tin | Pongpipat Company Limited                        | MYANMAR                                |
| Tin | Precious Minerals and Smelting Limited           | INDIA                                  |
| Tin | PT Aries Kencana Sejahtera                       | INDONESIA                              |
| Tin | PT Artha Cipta Langgeng                          | INDONESIA                              |
| Tin | PT ATD Makmur Mandiri Jaya                       | INDONESIA                              |
| Tin | PT Babel Inti Perkasa                            | INDONESIA                              |
| Tin | PT Babel Surya Alam Lestari                      | INDONESIA                              |
| Tin | PT Bangka Prima Tin                              | INDONESIA                              |
| Tin | PT Bangka Serumpun                               | INDONESIA                              |
| Tin | PT Bangka Tin Industry                           | INDONESIA                              |
| Tin | PT Belitung Industri Sejahtera                   | INDONESIA                              |
| Tin | PT Bukit Timah                                   | INDONESIA                              |
| Tin | PT Cipta Persada Mulia                           | INDONESIA                              |
| Tin | PT Menara Cipta Mulia                            | INDONESIA                              |
| Tin | PT Mitra Stania Prima                            | INDONESIA                              |
| Tin | PT Mitra Sukses Globalindo                       | INDONESIA                              |
| Tin | PT Panca Mega Persada                            | INDONESIA                              |
| Tin | PT Premium Tin Indonesia                         | INDONESIA                              |
| Tin | PT Prima Timah Utama                             | INDONESIA                              |

|     |                                  |           |
|-----|----------------------------------|-----------|
| Tin | PT Putera Sarana Shakti (PT PSS) | INDONESIA |
| Tin | PT Rajawali Rimba Perkasa        | INDONESIA |
| Tin | PT Rajehan Ario                  | INDONESIA |
| Tin | PT REFINED BANGKA TIN            | INDONESIA |
| Tin | PT Sariwiguna Binasentosa        | INDONESIA |
| Tin | PT Stanindo Inti Perkasa         | INDONESIA |
| Tin | PT Sukses Inti Makmur (SIM)      | INDONESIA |
| Tin | PT Timah Nusantara               | INDONESIA |
| Tin | PT Timah Tbk Kundur              | INDONESIA |
| Tin | PT Timah Tbk Mentok              | INDONESIA |
| Tin | PT Tinindo Inter Nusa            | INDONESIA |
| Tin | PT Tirus Putra Mandiri           | INDONESIA |
| Tin | PT Tommy Utama                   | INDONESIA |

|     |   |                           |
|-----|---|---------------------------|
| Tin | Resind Industria e Comercio Ltda.   | BRAZIL                    |
| Tin | Rui Da Hung   | TAIWAN, PROVINCE OF CHINA |
| Tin | Super Ligas   | BRAZIL                    |
| Tin | Takehara PVD Materials Plant / PVD Materials Division of MITSUI MINING & SMELTING CO., LTD. | JAPAN                     |
| Tin | Thaisarco   | THAILAND                  |
| Tin | Tin Smelting Branch of Yunnan Tin Co., Ltd.   | CHINA                     |
| Tin | Tin Technology & Refining   | UNITED STATES OF AMERICA  |
| Tin | Tuyen Quang Non-Ferrous Metals Joint Stock Company  | VIETNAM                   |
| Tin | VQB Mineral and Trading Group JSC   | VIETNAM                   |
| Tin | White Solder Metalurgia e Mineracao Ltda.   | BRAZIL                    |
| Tin | Woodcross Smelting Company Limited  | UGANDA                    |
| Tin | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.   | CHINA                     |
| Tin | Yunnan Yunfan Non-ferrous Metals Co., Ltd.  | CHINA                     |

---



#### 4. TUNGSTEN

| <b>Metal</b> | <b>Smelter Name</b>   | <b>Country</b>           |
|--------------|---|--------------------------|
| Tungsten     | A.L.M.T. Corp.  | JAPAN                    |
| Tungsten     | ACL Metais Eireli   | BRAZIL                   |
| Tungsten     | Albasteel Industria e Comercio de Ligas Para Fundicao Ltd.                        | BRAZIL                   |
| Tungsten     | Asia Tungsten Products Vietnam Ltd.   | VIETNAM                  |
| Tungsten     | China Molybdenum Tungsten Co., Ltd.   | CHINA                    |
| Tungsten     | Chongyi Zhangyuan Tungsten Co., Ltd.  | CHINA                    |
| Tungsten     | CNMC (Guangxi) PGMA Co., Ltd.   | CHINA                    |
| Tungsten     | Cronimet Brasil Ltda  | BRAZIL                   |
| Tungsten     | DONGKUK INDUSTRIES CO., LTD.  | KOREA, REPUBLIC OF       |
| Tungsten     | Fujian Xinlu Tungsten Co., Ltd.   | CHINA                    |
| Tungsten     | Ganzhou Jiangwu Ferrotungsten Co., Ltd.   | CHINA                    |
| Tungsten     | Ganzhou Seadragon W & Mo Co., Ltd.  | CHINA                    |
| Tungsten     | Global Tungsten & Powders LLC   | UNITED STATES OF AMERICA |
| Tungsten     | Guangdong Xianglu Tungsten Co., Ltd.  | CHINA                    |
| Tungsten     | H.C. Starck Tungsten GmbH   | GERMANY                  |
| Tungsten     | HANNAE FOR T Co., Ltd.  | KOREA, REPUBLIC OF       |
| Tungsten     | Hubei Green Tungsten Co., Ltd.  | CHINA                    |
| Tungsten     | Hunan Chenzhou Mining Co., Ltd.   | CHINA                    |
| Tungsten     | Hunan Jintai New Material Co., Ltd.   | CHINA                    |
| Tungsten     | Hunan Shizhuyuan Nonferrous Metals Co., Ltd.<br>Chenzhou Tungsten Products Branch | CHINA                    |
| Tungsten     | Japan New Metals Co., Ltd.  | JAPAN                    |
| Tungsten     | Jiangwu H.C. Starck Tungsten Products Co., Ltd.                                   | CHINA                    |
| Tungsten     | Jiangxi Gan Bei Tungsten Co., Ltd.  | CHINA                    |

| <b>Metal</b> | <b>Smelter Name</b>   | <b>Country</b>            |
|--------------|---|---------------------------|
| Tungsten     | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.         | CHINA                     |
| Tungsten     | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | CHINA                     |
| Tungsten     | Jiangxi Xinsheng Tungsten Industry Co., Ltd.                  | CHINA                     |
| Tungsten     | Jiangxi Yaosheng Tungsten Co., Ltd.                           | CHINA                     |
| Tungsten     | Kenee Mining Corporation Vietnam                              | VIETNAM                   |
| Tungsten     | Kennametal Fallon   | UNITED STATES OF AMERICA  |
| Tungsten     | Kennametal Huntsville   | UNITED STATES OF AMERICA  |
| Tungsten     | Lianyou Metals Co., Ltd.                                      | TAIWAN, PROVINCE OF CHINA |
| Tungsten     | Lianyou Resources Co., Ltd.                                   | TAIWAN, PROVINCE OF CHINA |
| Tungsten     | Malipo Haiyu Tungsten Co., Ltd.                               | CHINA                     |
| Tungsten     | Masan High-Tech Materials                                     | VIETNAM                   |

|          |   |                          |
|----------|---|--------------------------|
| Tungsten | Nam Viet Cromit Joint Stock Company           | VIETNAM                  |
| Tungsten | Niagara Refining LLC                          | UNITED STATES OF AMERICA |
| Tungsten | Philippine Chuangxin Industrial Co., Inc.     | PHILIPPINES              |
| Tungsten | Shinwon Tungsten (Fujian Shanghang) Co., Ltd. | CHINA                    |
| Tungsten | TANIOBIS Smelting GmbH & Co. KG               | GERMANY                  |
| Tungsten | Tungsten Vietnam Joint Stock Company          | VIETNAM                  |
| Tungsten | Wolfram Bergbau und Hutten AG                 | AUSTRIA                  |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd.              | CHINA                    |
| Tungsten | Xiamen Tungsten Co., Ltd.                     | CHINA                    |
| Tungsten | YUDU ANSHENG TUNGSTEN CO., LTD.               | CHINA                    |

---

## Appendix B: Mines Country of Origin List

|                              |
|------------------------------|
| Andorra                      |
| Argentina                    |
| Australia                    |
| Austria                      |
| Belarus                      |
| Belgium                      |
| Bolivia                      |
| Brazil                       |
| Burundi                      |
| Cambodia                     |
| Canada                       |
| Chile                        |
| China                        |
| Colombia                     |
| Democratic Republic of Congo |
| Ecuador                      |
| Egypt                        |
| Estonia                      |
| Ethiopia                     |
| France                       |
| Germany                      |
| Ghana                        |
| Guinea                       |
| Guyana                       |
| Hong Kong                    |
| Hungary                      |
| India                        |
| Indonesia                    |

|            |
|------------|
| Ireland    |
| Italy      |
| Japan      |
| Kazakhstan |
| Korea      |
| Luxembourg |
| Madagascar |
| Malaysia   |
| Mexico     |
| Mongolia   |
| Morocco    |

---

|                  |
|------------------|
| Mozambique       |
| Myanmar          |
| Namibia          |
| Netherlands      |
| Nicaragua        |
| Nigeria          |
| Panama           |
| Papua New Guinea |
| Peru             |
| Philippines      |
| Poland           |
| Portugal         |
| Russia           |
| Rwanda           |
| Saudi Arabia     |
| Sierra Leone     |
| Singapore        |
| Slovakia         |
| South Africa     |
| Spain            |
| Sudan            |
| Sweden           |
| Switzerland      |
| Taiwan           |
| Tanzania         |
| Thailand         |
| Togo             |
| Turkey           |
| Uganda           |
| United Kingdom   |

|                          |
|--------------------------|
| United States of America |
| Uzbekistan               |
| Vietnam                  |
| Zambia                   |
| Zimbabwe                 |

---