

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

Form SD

Specialized Disclosure Report

Baker Hughes Holdings LLC

State of incorporation/organization:

Delaware

Commission File Number:

1-9397

IRS Employer Identification Number:

76-0207995

Address of principal executive offices:

17021 Aldine Westfield
Houston TX 77073

Person to contact in connection with this report:

Regina Jones
Chief Legal Officer
(713) 439-8600

Rule pursuant to which this form is being filed:

- Rule 13p-1, 17 CFR 240.13p-1 – Securities Exchange Act, 15 U.S.C 78m(p) – Section 1502, Dodd-Frank Act
- Securities Exchange Act, 15 U.S.C 78m(q) – Section 1504, Dodd-Frank Act

Period to which the information in this form applies:

January 1, 2019 to December 31, 2019

Section 1 – Conflict Minerals Disclosures

ITEM 1.01 CONFLICT MINERALS DISCLOSURE AND REPORT

REASONABLE COUNTRY OF ORIGIN INQUIRY

Determinations made.

Baker Hughes Holdings LLC (“Baker Hughes,” “Company,” “we,” “our” and “us”), a Delaware limited liability company, determined that we obtained in calendar year 2019 conflict minerals necessary for the production of certain products manufactured or contracted to be manufactured for sale by the Company.

Description of inquiry.

The Company’s inquiry is described in this Specialized Disclosure Report, which includes our Conflict Minerals Report (the “Report”) attached to this Form SD as **Exhibit 1.01**.

Additional information on the Company’s conflict minerals compliance program can be found at the following web page: <https://www.bhge.com/corporate-responsibility/people/suppliers>

Results of inquiry.

The Company received information regarding conflict minerals in our supply chain from 252 relevant suppliers. Approximately 23% of the responding suppliers furnished relevant materials to the Company with the Democratic Republic of Congo (“DRC”) or an adjoining country (collectively, “DRC Region”) as the country of origin. Approximately 77% of the responding suppliers furnished relevant materials to the Company originating either outside of the DRC Region or from recycled or scrap sources. A table listing all originating countries and recycled or scrap sources for each Conflict Mineral is set forth as Schedule 1 to the Report.

CONFLICT MINERALS DISCLOSURE

A copy of this Form SD and the Report, for the calendar year ended December 31, 2019, are available for access by all interested parties on the Company’s public Internet website: <https://www.bhge.com/corporate-responsibility/people/suppliers>

CONFLICT MINERALS REPORT

The Company has filed the Report, which is attached as **Exhibit 1.01**, contemporaneously with this Form SD.

Section 2 – Exhibits

ITEM 2.01 EXHIBITS

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 duly authorized undersigned.

Baker Hughes Holdings LLC

/s/ Lee Whitley

May 29, 2020

Lee Whitley

Vice President and Corporate Secretary

Exhibit 1.01

Conflict Minerals Report

This Report has been prepared pursuant to Rule 13p-1 of the Securities Exchange Act of 1934, as amended (“Rule 13p-1”) for the reporting period from January 1 to December 31, 2019. The Company is an energy technology company that provides solutions for energy and industrial customers worldwide.

The Company’s supply chain is both global and complex, and there are multiple tiers of suppliers between the Company and the original sources of minerals used in the Company’s products. Therefore, the Company relied on its direct suppliers to provide information about the origin of conflict minerals in the raw materials and components it purchased for use in the manufacture of, or contracts to manufacture, products that the Company offers for sale.

The Report contains forward-looking statements within the meaning of Section 27A of the Securities Act of 1933, as amended, and Section 21E of the Securities Exchange Act of 1934, as amended, (each a “forward-looking statement”). The words “will,” “intend,” “anticipate,” “believe,” “ensure,” “expect,” “if,” “estimate,” “project,” “foresee,” “predict,” “outlook,” “aim,” “could,” “should,” “potential,” “would,” “may,” “probable,” “likely,” and similar expressions, and the negative thereof, are intended to identify forward-looking statements. These forward-looking statements are also affected by the risk factors described in the Company’s Annual Report on Form 10-K for the year ended December 31, 2019, Quarterly Report on Form 10-Q for the quarter ended March 31, 2020, recent Current Reports on Form 8-K, and other Securities and Exchange Commission filings available through the Company’s website at: <https://investors.bakerhughes.com/> or through the SEC’s Electronic Data Gathering and Analysis Retrieval (“EDGAR”) system at: www.sec.gov. The Company undertakes no obligation to publicly update or revise any forward-looking statement.

Reasonable Country of Origin Inquiry

Management Systems

The Company is committed to the responsible sourcing of raw materials and components necessary to the production or functionality of our products, and we have publicly posted this policy. The policy, including the commitment to establishing a conflict-free supply chain, may be found at: <https://www.bhge.com/corporate-responsibility/people/suppliers>

In accordance with Rule 13p-1, the Company undertook a reasonable country of origin inquiry to determine the origin of the conflict minerals necessary to the production or functionality of the products we offered for sale during the reporting period. The Company undertook the following as part of that inquiry:

- utilized the Company’s existing mechanisms for reporting conflict minerals concerns, allowing contact by telephone, email and online, for both the public and internal reporters;
- identified those products we manufactured or contracted to manufacture that we reasonably believed contained one or more conflict minerals (defined as cassiterite, columbite-tantalite, gold, wolframite, and their derivatives, which are limited to tin, tantalum, tungsten, and gold collectively, the “Conflict Minerals” or sometimes “conflict minerals” or “3TGs”), by first eliminating those products that were not subject to Rule 13p-1, including tool rentals, tools used in performance of our services, chemicals, and fluids;
- using lessons learned during the previous reporting period, we prioritized our project scoping process to help identify relevant raw materials or components used in the manufacture or contract for manufacture of the products specifically identified in the step above;
- identified 442 suppliers that provided the materials or components specifically identified and prioritized in the previous step;
- engaged the services of a third-party conflict minerals service provider to create and maintain a supplier engagement portal;
- using the third-party conflict minerals service provider’s technology platform, contacted the identified suppliers;
- informed relevant suppliers of the Company’s expectations regarding supplier conflict minerals policy, due diligence processes, and responses to the Company’s requests for information;

- requested these suppliers to determine which of the materials or components they provided to the Company contained one or more conflict minerals;
- requested these suppliers to in turn require their suppliers to comply with the Company's conflict minerals requirements;
- requested these suppliers to develop a policy and management system covering conflict minerals and to require their suppliers to in turn adopt similar policies and systems;
- informed these suppliers of the informational and instructional materials available on our third-party conflict minerals service provider's Conflict Minerals Resource Center web page, the Conflict Minerals Reporting Template ("CMRT") questionnaire, and due diligence guidelines;
- requested confirmation from these suppliers of the presence of every necessary conflict mineral in the raw materials or components they supplied to the Company, and information regarding the origin of those minerals;
- established a deadline of May 6, 2020 to provide the requested conflict minerals information and documentation;
- followed up with unresponsive suppliers by having the Company's third-party service provider send up to three email messages;
- reviewed the responses compiled for each responding supplier to determine existence of a conflict minerals policy, due diligence process, and pass-through requirements for successive supplier tiers;
- reviewed the responses compiled for each responding supplier to determine which smelters or refiners ("SORs") were the source of necessary conflict minerals contained in the raw materials or components supplied to the Company;
- received completed questionnaires from 69% of the identified suppliers contacted by our third-party conflict minerals service provider; and
- identified six SORs that pose a high risk of obtaining 3TGs from non-conflict free sources in the DRC Region.

The Company's representatives have also participated in monthly Responsible Minerals Initiative Multi-Stakeholder Group (MSG) calls, as well as attended various webinars, to enable us to consider best practices and to explore opportunities to participate in responsible sourcing and supply chain transparency. Additionally, a representative of the Company's Conflict Minerals Management Team attended and participated in a panel discussion at a Conflict Minerals and Supply Chain conference, to consider and offer insight into the continued development of best practices.

The Company's responding relevant suppliers identified 303 verified SORs believed to be the source of necessary conflict minerals contained in the raw materials or components supplied to the Company. Of those supplier-identified SORs, 13 were identified as sourcing from mines in the DRC Region; however, each of these SORs reported their source of minerals were conflict-free. Additionally, 12 SORs were identified as noncompliant with or not enrolled in a verification program; and 5 SORs were undergoing review or were being vetted by a verification process.

The due diligence undertaken is more fully described below.

Design of Due Diligence

The Company's due diligence was designed in conformance with an internationally recognized due diligence framework: the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Second Edition). OECD Step 1 is addressed above, under the heading "Reasonable Country of Origin Inquiry." and Steps 2 – 5 are addressed below in the subheadings under "Due Diligence Measures Undertaken."

Due Diligence Measures Undertaken

- Identification and Assessment of Risks in the Supply Chain

The Company determined that approximately 2% of the identified SORs in our global supply chain required due diligence on source and chain of custody of conflict minerals provided to the Company based upon the applicability of one or more of the following criteria:

- reported sourcing conflict minerals from the conflict area that were not verified as conflict-free;
- provided data on SORs that self-report sourcing from a mine located in the conflict area;
- provided data on SORs that were reported by independent entities to source from a mine located in the conflict area;
- indicated that the SOR named by the supplier passed materials through a known or suspected country for smuggling, export out of other countries, or the transit of materials containing conflict minerals; or
- provided information about an SOR indicating the origin of the materials was not from a country known to hold reserves.

Response to Identified Risks

The Company undertook the following measures during due diligence on the source and chain of custody of the conflict minerals:

- independently verified all SOR information submitted by suppliers in their CMRTs, checking against the third-party conflict minerals service provider's independent smelter research, including:
 - merged duplicate submissions following verification of overlapping company information;
 - eliminated submissions with garbage characters and obvious misspellings;
 - validated named entities as actual SORs; and
 - confirmed that each facility is a legitimate SOR of 3TGs;
- gathered information on legitimate SORs in the SOR databases from several sources, including without limitation the third-party service provider's independent research, Responsible Minerals Initiative ("RMI"), London Bullion Market Association ("LBMA"), the Dubai Multi Commodities Centre ("DMCC"), the Responsible Jewellery Council ("RJC"), the US Department of Commerce ("DoC"), and the US Geological Survey ("USGS") (the "Third-Party Database");
- if a supplier did not provide a proper identification number issued by a validating entity, such as RMI or LBMA, we requested the supplier to provide the following information:
 - the metal processed by the facility;
 - the city, province/state and country where the facility is located;
 - the name and email address for the designated contact at the facility;
 - the recycled and scrap status of metals, minerals or ores processed by the facility;
 - if the facility sources all of its metals, minerals or ores solely from recycled or scrap materials, the country of origin of those materials; and
 - if the facility does not source all materials solely from recycled or scrap providers, the location of mines from which the facility sources its metals, minerals or ores;
- labeled as "Valid" those SOR submissions from suppliers that matched the Third-Party Database of legitimate SORs and performed additional verification:
 - inquired whether the SOR has been audited by one or more recognized certification entities, such as RMI, LBMA, DMCC, or RJC, and if not, whether they undergo another form of an independent audit; and
 - those SORs that have not undergone a certification audit were asked if they plan to undertake a certification process in the future;
- labeled as "Invalid" those SORs submitted by a supplier that matched the Third-Party Database list of facilities known not to be a legitimate facility, or a common erroneous or inoperative name;
- labeled as "Undetermined" those SORs submitted by a supplier that did not match either the legitimate or non-legitimate lists in the Third-Party Database;
- identified suppliers that submitted SOR names determined to be Invalid or Undetermined for future contact to correct or amend the pertinent information;
- for each Valid SOR, we assigned a risk rating of low, medium or high, based on the following factors:
 - whether the facility has or has not already successfully undergone a certification audit by a recognized entity;
 - whether the facility is registered with a certification body, and if so, is progressing toward completing an audit process by that body;

- whether the facility is proximate to, conducts conflict mineral transactions with entities within, or transports materials through any of the following:
 - a Level 1 country, with known active ore production and not identified as either conflict regions or plausible countries engaged in smuggling materials containing conflict minerals;
 - a Level 2 country, known to or plausibly believed to be engaged in smuggling, export out of a Level 3 country, or as a transit for materials containing conflict minerals; or
 - a Level 3 country, the DRC or one of its nine adjoining countries, Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia, collectively referred to as "covered countries" in Section 1502 of the Dodd Frank Act;
- for each supplier, calculated a cumulative SOR risk, either low, medium, or high, summarizing the risk that the supplier poses to the Company's supply chain, based on the chances that the supplier furnishes 3TGs that may originate from non-conflict free sources:
 - obtained the value of the cumulative SOR risk for each supplier by collecting the risk ratings of all SORs associated with the supplier; and
 - for each supplier, assigned the overall risk rating equal to the risk rating level with the most SORs at that level;

Independent Audit of SOR Due Diligence Practices

- The Company became a participating member of the Responsible Minerals Initiative (RMI) as of July 2017, and supports efforts by the RMI to promote smelter and refiner registration, audit and verification of conflict status.

Annual Report on Supply Due Diligence

- The Company annually reports on our global supply chain due diligence and makes the current and historical reports available on our public website: <https://www.bhge.com/corporate-responsibility/people/suppliers>

Independent Private Sector Audit

The Company is not subject to an independent private sector audit of the Report.

Results of Due Diligence Undertaken and Processing Facilities

Based on the Company's due diligence efforts to date, the Company does not have sufficient information to fully determine each processing facility utilized to produce the conflict minerals used in each of the Company's relevant products. However, Schedule 2 below lists the processing facilities that source minerals from the DRC for which the Company has been able to confirm the information provided by our suppliers.

Based on the Company's due diligence efforts to date, the Company does not have sufficient information to fully determine the country of origin of the conflict minerals in each of our relevant products, or whether the conflict minerals in each of our products were from recycled or scrap sources. However, Schedule 1 below lists the countries of origin, by pertinent mineral, for which the Company has been able to confirm the information provided by our suppliers.

The efforts to determine the origin of conflict minerals are more fully described in the section entitled "Due Diligence Measures Undertaken."

Risk Mitigation

With respect to those products the Company manufactures or contracts to be manufactured for sale that contain necessary conflict minerals, the Company plans to undertake the following steps to mitigate the risk that our necessary conflict minerals could unintentionally benefit armed groups:

- improve processes to identify the presence of necessary conflict minerals in products we manufacture or contract to be manufactured and offer for sale by:

- seeking to increase our supplier response rate in reporting period 2020, while recognizing that response rates will depend on supplier cooperation;
 - continue communication with suppliers and spread best practices learned during the execution of the 3TG due diligence process in 2019 in order to improve the percentage of relevant suppliers responding to Baker Hughes' supply chain surveys and the quality of their responses;
 - continue the identification of and communication with smelters and refiners in Baker Hughes' supply chain, both directly and indirectly through Baker Hughes' relevant suppliers, in order to continue to increase the number of smelters and refiners that participate in RMI's Responsible Minerals Assurance Process (RMAP);
 - continue to participate in industry initiatives encouraging responsible supply chains; and
 - as new relevant suppliers are added to the Baker Hughes' supply chain, work with these suppliers to help ensure that they understand our compliance requirements, the requirements of the Conflict Minerals Rule and the OECD Guidance.
- continue to assess the presence of necessary conflict minerals in our relevant supply chain;
 - continue to perform due diligence on the necessary conflict minerals supplied to us to determine their origin;
 - continue to clearly communicate to suppliers our expectations with regard to compliance with the Company's stated policies, performance, transparency and responsible sourcing practices;
 - engage with our suppliers to properly identify and obtain relevant information from "Invalid" or "Undetermined" SORs in our supply chain;
 - engage with suppliers identified as sourcing from high-risk SORs, including those not enrolled in or compliant with a verification program, to encourage them to source from conflict-free SORs or mines and obtain from their applicable SORs or mines conflict-free designations from recognized certification programs;
 - continue to engage with suppliers that did not respond to our request for conflict minerals information for the reporting period 2019, ultimately seeking to engage as many of those suppliers as possible during the reporting year 2020 to:
 - determine the reasons for past failures to respond,
 - address supplier concerns and questions as appropriate, and
 - offer suppliers resources, including educational and other guidance materials, to facilitate future responses;
 - follow up with all high and medium cumulative risk suppliers in order to assist them in understanding their risk level and the future implications their risk level could have on the Company's conflict minerals program;
 - suppliers potentially sourcing from high-risk and non-conflict free SORs, to verify actual relevant mineral sources,
 - suppliers actually sourcing from high-risk and non-conflict free SORs, to work toward sourcing from alternative sources,
 - suppliers with weak conflict minerals programs, to provide information, education and training to support strengthening their programs, and
 - suppliers failing to respond to multiple past conflict minerals information requests, to prioritize understanding of and compliance with our due diligence program requirements;
 - conduct analysis and verification of origin information provided by our suppliers;
 - design and implement, as appropriate, an audit process to verify SOR and country of origin information provided by our suppliers;
 - continue to actively participate in the RMI's efforts to improve and expand engagement of SORs by independent certifying organizations;
 - monitor the activities, initiatives and programs of DRC regional governments and agencies, international bodies, and non-governmental organizations that are aimed at minimizing or eliminating the benefit to relevant armed groups derived from conflict minerals, and, where practicable, to support or implement those activities, initiatives or programs;
 - seek, where practicable, alternative suppliers that responsibly source necessary conflict minerals, which may include sources within the conflict area that do not benefit armed groups; and

- continue to participate in local and national industry groups, as well as non-governmental organizations, such as the Responsible Sourcing Network Multi-Stakeholder Group, to develop best practices regarding responsible sourcing and supply chain transparency.

Products Description

The Company's products covered by this Report that are considered to contain necessary conflict minerals include the following:

Oilfield Equipment – includes blowout preventers; control systems; marine drilling risers; wellhead connectors; diverters; control systems; manifolds; connections; wellheads; specialty connectors & pipes; advanced flexible pipe products including risers, flowlines, and fluid transfer lines and jumpers; flow equipment; valves; and actuators used for deepwater drilling, subsea production systems (SPS), flexible pipe systems, and onshore wellheads.

Turbomachinery & Process Solutions - includes mechanical-drive, compression and power-generation applications across the oil and gas industry, as well as products used to serve the downstream segments of the industry including drivers, driven equipment, and flow control systems.

Oilfield Services - includes products for on and offshore operations across the lifecycle of a well, ranging from drilling, evaluation, completion, production, and intervention, including diamond and tri-cone drill bits, directional drilling technology, measurement while drilling and logging while drilling systems, completions tools and systems, wellbore intervention tools and services, and artificial lift systems.

Digital Solutions – includes condition monitoring, inspection technologies, measurement, sensing, and pipeline solutions.

Schedule 1

The information in this Schedule is solely an aggregation of data provided by verified SORs identified by the Company's suppliers. This is not a confirmation of conflict minerals actually contained in the Company's products. Additionally, since this aggregation depends on self-identification by SORs, the following lists are not a confirmation or verification of every country of origin.

COUNTRIES OF ORIGIN - TANTALUM

| | | | |
|--------------------------------|-------------|-------------------|----------------|
| Angola * | Egypt | Luxembourg | Singapore |
| Argentina | Estonia | Madagascar | Slovakia |
| Australia | Ethiopia | Malaysia | Slovenia |
| Austria | France | Mali | South Africa |
| Belarus | Germany | Mexico | South Sudan * |
| Belgium | Ghana | Mongolia | Spain |
| Bolivia | Guinea | Mozambique | Suriname |
| Brazil | Guyana | Myanmar | Switzerland |
| Burundi * | Hungary | Namibia | Tanzania * |
| Cambodia | India | Netherlands | Thailand |
| Canada | Indonesia | Niger | USA |
| Central African Republic * | Ireland | Nigeria | Uganda * |
| Chile | Israel | Peru | United Kingdom |
| China | Italy | Philippines | Viet Nam |
| Colombia | Ivory Coast | Poland | Zambia * |
| Czech Republic | Japan | Portugal | Zimbabwe |
| Democratic Republic of Congo * | Kazakhstan | Republic Of Korea | |
| Djibouti | Kenya | Russia | |
| Ecuador | Kyrgyzstan | Rwanda * | Recycle/Scrap |
| | Laos | Sierra Leone | |

* = DRC Region countries

COUNTRIES OF ORIGIN - TIN

| | | | |
|--------------------------------|-------------|-------------------|----------------|
| Angola | Egypt | Mexico | South Africa |
| Argentina | Estonia | Mongolia | South Sudan * |
| Australia | Ethiopia | Morocco | Spain |
| Austria | France | Mozambique | Suriname |
| Belgium | Germany | Myanmar | Sweden |
| Bermuda | Guyana | Namibia | Switzerland |
| Bolivia | Hungary | Netherlands | Tanzania * |
| Brazil | India | Niger | Thailand |
| Burundi * | Indonesia | Nigeria | Turkey |
| Cambodia | Ireland | Papua New Guinea | USA |
| Canada | Israel | Peru | Uganda * |
| Central African Republic * | Ivory Coast | Philippines | United Kingdom |
| Chile | Japan | Poland | Uzbekistan |
| China | Kazakhstan | Portugal | Viet Nam |
| Colombia | Kenya | Republic Of Korea | Zambia * |
| Czech Republic | Kyrgyzstan | Russia | Zimbabwe |
| Democratic Republic of Congo * | Laos | Rwanda * | |
| Djibouti | Luxembourg | Sierra Leone | |
| Ecuador | Madagascar | Singapore | Recycle/Scrap |
| | Malaysia | Slovakia | |

* = DRC Region countries

COUNTRIES OF ORIGIN - TUNGSTEN

| | | | |
|--------------------------------|-------------|-------------------|----------------|
| Angola | Djibouti | Luxembourg | Sierra Leone |
| Argentina | Ecuador | Madagascar | Singapore |
| Australia | Egypt | Malaysia | Slovakia |
| Austria | Estonia | Mexico | South Sudan * |
| Belgium | Ethiopia | Mongolia | Spain |
| Boliva | France | Mozambique | Suriname |
| Bolivia | Germany | Myanmar | Switzerland |
| Brazil | Guinea | Namibia | Tanzania * |
| Burundi * | Guyana | Netherlands | Thailand |
| Cambodia | Hungary | Niger | USA |
| Canada | India | Nigeria | Uganda * |
| Central African Republic * | Indonesia | Papua New Guinea | United Kingdom |
| Chile | Ireland | Peru | Viet Nam |
| China | Israel | Philippines | Zambia * |
| Colombia | Ivory Coast | Portugal | Zimbabwe |
| Czech Republic | Japan | Republic Of Korea | |
| Democratic Republic of Congo * | Kazakhstan | Russia | |
| | Laos | Rwanda * | Recycle/Scrap |

* = DRC Region countries

COUNTRIES OF ORIGIN - GOLD

| | | | |
|--------------------------------|-------------|-------------------|----------------------|
| Afghanistan | Ecuador | Luxembourg | Slovakia |
| Albania | Egypt | Madagascar | South Africa |
| Angola * | England | Malaysia | South Sudan * |
| Argentina | Estonia | Mali | Spain |
| Armenia | Ethiopia | Mauritania | Sudan |
| Australia | Finland | Mexico | Suri |
| Austria | France | Mongolia | Suriname |
| Belgium | Germany | Mozambique | Sweden |
| Bermuda | Ghana | Myanmar | Switzerland |
| Bolivia | Guinea | Namibia | Tanzania * |
| Bolivia | Guyana | Netherlands | Thailand |
| Brazil | Hungary | New Zealand | Turkey |
| Bulgaria | India | Niger | USA |
| Burundi * | Indonesia | Nigeria | Uganda * |
| Cambodia | Ireland | Papua New Guinea | United Arab Emirates |
| Canada | Israel | Peru | United Kingdom |
| Central African Republic * | Italy | Philippines | Uzbekistan |
| Chile | Ivory Coast | Poland | Viet Nam |
| China | Japan | Portugal | Zambia * |
| Colombia | Kazakhstan | Republic of Korea | Zimbabwe |
| Czech Republic | Kenya | Russia | |
| Democratic Republic of Congo * | Kyrgyzstan | Rwanda * | |
| Djibouti | Laos | Saudi Arabia | |
| Dominican Republic | Liberia | Sierra Leone | Recycle/Scrap |
| | Lithuania | Singapore | |

* = DRC Region countries

Schedule 2

Smelters or Refiners with Identified Mineral Sources

The information in this Schedule is solely an aggregation of data provided by verified SORs identified by the Company's suppliers. This is not a confirmation of conflict minerals actually contained in the Company's products. Additionally, since this aggregation depends on self-identification by SORs, the following lists are not a confirmation or verification of every country of origin.

| Smelter ID | Standard Smelter Name | Metal | Conflict Free? * | Smelter Facility Location | Source from DRC? |
|------------|---------------------------------------------------------------|-------|------------------|---------------------------|------------------|
| CID002763 | 8853 S.p.A. | Gold | Yes | ITALY | Unknown |
| CID002708 | Abington Reldan Metals, LLC | Gold | Unknown | UNITED STATES OF AMERICA | Unknown |
| CID000015 | Advanced Chemical Company | Gold | Yes | UNITED STATES OF AMERICA | No |
| CID003185 | African Gold Refinery ** | Gold | Unknown | UGANDA | Unknown |
| CID000019 | Aida Chemical Industries Co., Ltd. | Gold | Yes | JAPAN | No |
| CID002560 | Al Etihad Gold Refinery DMCC | Gold | Yes | UNITED ARAB EMIRATES | Unknown |
| CID000035 | Allgemeine Gold-und Silberscheideanstalt A.G. | Gold | Yes | GERMANY | Unknown |
| CID000041 | Almalyk Mining and Metallurgical Complex (AMMC) | Gold | Yes | UZBEKISTAN | Unknown |
| CID000058 | AngloGold Ashanti Corrego do Sitio Mineracao | Gold | Yes | BRAZIL | Unknown |
| CID000077 | Argor-Heraeus S.A. | Gold | Yes | SWITZERLAND | Unknown |
| CID000082 | Asahi Pretec Corp. | Gold | Yes | JAPAN | Unknown |
| CID000924 | Asahi Refining Canada Ltd. | Gold | Yes | CANADA | Unknown |
| CID000920 | Asahi Refining USA Inc. | Gold | Yes | UNITED STATES OF AMERICA | Unknown |
| CID000090 | Asaka Riken Co., Ltd. | Gold | Yes | JAPAN | No |
| CID000103 | Atasay Kuyumculuk Sanayi Ve Ticaret A.S. | Gold | Unknown | TURKEY | Unknown |
| CID002850 | AU Traders and Refiners | Gold | Yes | SOUTH AFRICA | Unknown |
| CID000113 | Aurubis AG | Gold | Yes | GERMANY | Unknown |
| CID002863 | Bangalore Refinery | Gold | Yes | INDIA | No |
| CID000128 | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | Gold | Yes | PHILIPPINES | Unknown |
| CID000157 | Boliden AB | Gold | Yes | SWEDEN | Unknown |
| CID000176 | C. Hafner GmbH + Co. KG | Gold | Yes | GERMANY | Unknown |
| CID003421 | C.I Metales Procesados Industriales SAS | Gold | Unknown | COLOMBIA | Unknown |
| CID000180 | Caridad | Gold | Unknown | MEXICO | Unknown |
| CID000185 | CCR Refinery - Glencore Canada Corporation | Gold | Yes | CANADA | Unknown |
| CID000189 | Cendres + Metaux S.A. | Gold | Yes | SWITZERLAND | No |
| CID003382 | CGR Metalloys Pvt Ltd. | Gold | Unknown | INDIA | Unknown |
| CID000233 | Chimet S.p.A. | Gold | Yes | ITALY | Unknown |
| CID000264 | Chugai Mining | Gold | Yes | JAPAN | No |
| CID000343 | Daye Non-Ferrous Metals Mining Ltd. | Gold | Unknown | CHINA | Unknown |
| CID002867 | Degussa Sonne / Mond Goldhandel GmbH | Gold | Unknown | GERMANY | Unknown |
| CID003348 | Dijllah Gold Refinery FZC | Gold | Unknown | UNITED ARAB EMIRATES | Unknown |
| CID000362 | DODUCO Contacts and Refining GmbH | Gold | Yes | GERMANY | No |
| CID000401 | Dowa | Gold | Yes | JAPAN | No |
| CID003195 | DS PRETECH Co., Ltd. | Gold | Yes | KOREA, REPUBLIC OF | No |
| CID000359 | DSC (Do Sung Corporation) | Gold | Yes | KOREA, REPUBLIC OF | No |
| CID000425 | Eco-System Recycling Co., Ltd. East Plant | Gold | Yes | JAPAN | No |

| Smelter ID | Standard Smelter Name | Metal | Conflict Free? * | Smelter Facility Location | Source from DRC? |
|------------|-----------------------------------------------------------------|-------|------------------|---------------------------|------------------|
| CID003424 | Eco-System Recycling Co., Ltd. North Plant | Gold | Yes | JAPAN | No |
| CID003425 | Eco-System Recycling Co., Ltd. West Plant | Gold | Yes | JAPAN | No |
| CID002561 | Emirates Gold DMCC | Gold | Yes | UNITED ARAB EMIRATES | No |
| CID002515 | Fidelity Printers and Refiners Ltd. ** | Gold | Unknown | ZIMBABWE | Unknown |
| CID002584 | Fujairah Gold FZC | Gold | Unknown | UNITED ARAB EMIRATES | Unknown |
| CID002852 | GCC Gujrat Gold Centre Pvt. Ltd. | Gold | Unknown | INDIA | Unknown |
| CID002459 | Geib Refining Corporation | Gold | Yes | UNITED STATES OF AMERICA | No |
| CID003186 | Gold Coast Refinery | Gold | Unknown | GHANA | Unknown |
| CID002243 | Gold Refinery of Zijin Mining Group Co., Ltd. | Gold | Yes | CHINA | Unknown |
| CID001909 | Great Wall Precious Metals Co., Ltd. of CBPM | Gold | Unknown | CHINA | Unknown |
| CID002312 | Guangdong Jinding Gold Limited | Gold | Unknown | CHINA | Unknown |
| CID000651 | Guoda Safina High-Tech Environmental Refinery Co., Ltd. | Gold | Unknown | CHINA | Unknown |
| CID000671 | Hangzhou Fuchunjiang Smelting Co., Ltd. | Gold | Unknown | CHINA | Unknown |
| CID000694 | Heimerle + Meule GmbH | Gold | Yes | GERMANY | Unknown |
| CID000707 | Heraeus Metals Hong Kong Ltd. | Gold | Yes | CHINA | Unknown |
| CID000711 | Heraeus Precious Metals GmbH & Co. KG | Gold | Yes | GERMANY | Unknown |
| CID000767 | Hunan Chenzhou Mining Co., Ltd. | Gold | Unknown | CHINA | Unknown |
| CID000773 | Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd. | Gold | Unknown | CHINA | Unknown |
| CID000778 | HwaSeong CJ CO., LTD. | Gold | Unknown | KOREA, REPUBLIC OF | Unknown |
| CID000801 | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | Gold | Yes | CHINA | Unknown |
| CID002562 | International Precious Metal Refiners | Gold | Unknown | UNITED ARAB EMIRATES | Unknown |
| CID000807 | Ishifuku Metal Industry Co., Ltd. | Gold | Yes | JAPAN | Unknown |
| CID000814 | Istanbul Gold Refinery | Gold | Yes | TURKEY | Unknown |
| CID002765 | Italpreziosi | Gold | Yes | ITALY | Unknown |
| CID002893 | JALAN & Company | Gold | Unknown | INDIA | Unknown |
| CID000823 | Japan Mint | Gold | Yes | JAPAN | Unknown |
| CID000855 | Jiangxi Copper Co., Ltd. | Gold | Yes | CHINA | Unknown |
| CID000927 | JSC Ekaterinburg Non-Ferrous Metal Processing Plant | Gold | Unknown | RUSSIAN FEDERATION | Unknown |
| CID000929 | JSC Uralelectromed | Gold | Yes | RUSSIAN FEDERATION | Unknown |
| CID000937 | JX Nippon Mining & Metals Co., Ltd. | Gold | Yes | JAPAN | Unknown |
| CID002563 | Kaloti Precious Metals ** | Gold | Unknown | UNITED ARAB EMIRATES | Unknown |
| CID000956 | Kazakhmys Smelting LLC | Gold | Unknown | KAZAKHSTAN | Unknown |
| CID000957 | Kazzinc | Gold | Yes | KAZAKHSTAN | Unknown |
| CID000969 | Kennecott Utah Copper LLC | Gold | Yes | UNITED STATES OF AMERICA | Unknown |
| CID002511 | KGHM Polska Miedz Spolka Akcyjna | Gold | Yes | POLAND | Unknown |
| CID000981 | Kojima Chemicals Co., Ltd. | Gold | Yes | JAPAN | No |
| CID002605 | Korea Zinc Co., Ltd. | Gold | Yes | KOREA, REPUBLIC OF | No |
| CID001029 | Kyrgyzaltyn JSC | Gold | Yes | KYRGYZSTAN | Unknown |
| CID002865 | Kyshtym Copper-Electrolytic Plant ZAO | Gold | Unknown | RUSSIAN FEDERATION | Unknown |
| CID001032 | L'azurde Company For Jewelry | Gold | Unknown | SAUDI ARABIA | Unknown |
| CID001056 | Lingbao Gold Co., Ltd. | Gold | Unknown | CHINA | Unknown |
| CID001058 | Lingbao Jinyuan Tonghui Refinery Co., Ltd. | Gold | Unknown | CHINA | Unknown |
| CID002762 | L'Orfebre S.A. | Gold | Yes | ANDORRA | No |

| Smelter ID | Standard Smelter Name | Metal | Conflict Free? * | Smelter Facility Location | Source from DRC? |
|------------|-----------------------------------------------------------------------------|-------|------------------|---------------------------|------------------|
| CID001078 | LS-NIKKO Copper Inc. | Gold | Yes | KOREA, REPUBLIC OF | Unknown |
| CID000689 | LT Metal Ltd. | Gold | Yes | KOREA, REPUBLIC OF | No |
| CID001093 | Luoyang Zijin Yinhui Gold Refinery Co., Ltd. | Gold | Unknown | CHINA | Unknown |
| CID002606 | Marsam Metals | Gold | Yes | BRAZIL | No |
| CID001113 | Materion | Gold | Yes | UNITED STATES OF AMERICA | No |
| CID001119 | Matsuda Sangyo Co., Ltd. | Gold | Yes | JAPAN | Unknown |
| CID001149 | Metalor Technologies (Hong Kong) Ltd. | Gold | Yes | CHINA | Unknown |
| CID001152 | Metalor Technologies (Singapore) Pte., Ltd. | Gold | Yes | SINGAPORE | Unknown |
| CID001147 | Metalor Technologies (Suzhou) Ltd. | Gold | Yes | CHINA | No |
| CID001153 | Metalor Technologies S.A. | Gold | Yes | SWITZERLAND | Unknown |
| CID001157 | Metalor USA Refining Corporation | Gold | Yes | UNITED STATES OF AMERICA | Unknown |
| CID001161 | Metalurgica Met-Mex Penoles S.A. De C.V. | Gold | Yes | MEXICO | Unknown |
| CID001188 | Mitsubishi Materials Corporation | Gold | Yes | JAPAN | Unknown |
| CID001193 | Mitsui Mining and Smelting Co., Ltd. | Gold | Yes | JAPAN | Unknown |
| CID002509 | MMTC-PAMP India Pvt., Ltd. | Gold | Yes | INDIA | Unknown |
| CID002857 | Modeltech Sdn Bhd | Gold | Unknown | MALAYSIA | Unknown |
| CID002282 | Morris and Watson | Gold | Unknown | NEW ZEALAND | Unknown |
| CID001204 | Moscow Special Alloys Processing Plant | Gold | Yes | RUSSIAN FEDERATION | Unknown |
| CID001220 | Nadir Metal Rafineri San. Ve Tic. A.S. | Gold | Yes | TURKEY | Unknown |
| CID001236 | Navoi Mining and Metallurgical Combinat | Gold | Unknown | UZBEKISTAN | Unknown |
| CID003189 | NH Recytech Company | Gold | Unknown | KOREA, REPUBLIC OF | Unknown |
| CID001259 | Nihon Material Co., Ltd. | Gold | Yes | JAPAN | Unknown |
| CID002779 | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH | Gold | Yes | AUSTRIA | Unknown |
| CID001325 | Ohura Precious Metal Industry Co., Ltd. | Gold | Yes | JAPAN | No |
| CID001326 | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | Gold | Yes | RUSSIAN FEDERATION | Unknown |
| CID000493 | OJSC Novosibirsk Refinery | Gold | Yes | RUSSIAN FEDERATION | Unknown |
| CID001352 | PAMP S.A. | Gold | Yes | SWITZERLAND | Unknown |
| CID002872 | Pease & Curren | Gold | Unknown | UNITED STATES OF AMERICA | Unknown |
| CID001362 | Penglai Penggang Gold Industry Co., Ltd. | Gold | Unknown | CHINA | Unknown |
| CID002919 | Planta Recuperadora de Metales SpA | Gold | Yes | CHILE | No |
| CID001386 | Prioksky Plant of Non-Ferrous Metals | Gold | Yes | RUSSIAN FEDERATION | Unknown |
| CID001397 | PT Aneka Tambang (Persero) Tbk | Gold | Yes | INDONESIA | Unknown |
| CID001498 | PX Precinox S.A. | Gold | Yes | SWITZERLAND | Unknown |
| CID003324 | QG Refining, LLC | Gold | Unknown | UNITED STATES OF AMERICA | Unknown |
| CID001512 | Rand Refinery (Pty) Ltd. | Gold | Yes | SOUTH AFRICA | Unknown |
| CID000522 | Refinery of Seemine Gold Co., Ltd. | Gold | Unknown | CHINA | Unknown |
| CID002582 | REMONDIS PMR B.V. | Gold | Yes | NETHERLANDS | No |
| CID001534 | Royal Canadian Mint | Gold | Yes | CANADA | Unknown |
| CID002761 | SAAMP | Gold | Yes | FRANCE | Unknown |
| CID001546 | Sabin Metal Corp. | Gold | Unknown | UNITED STATES OF AMERICA | Unknown |
| CID002973 | Safimet S.p.A | Gold | Yes | ITALY | No |
| CID002290 | SAFINA A.S. | Gold | Unknown | CZECH REPUBLIC | Unknown |
| CID002853 | Sai Refinery | Gold | Unknown | INDIA | Unknown |
| CID001555 | Samduck Precious Metals | Gold | Yes | KOREA, REPUBLIC OF | No |
| CID001562 | Samwon Metals Corp. | Gold | Unknown | KOREA, REPUBLIC OF | Unknown |

| Smelter ID | Standard Smelter Name | Metal | Conflict Free? * | Smelter Facility Location | Source from DRC? |
|------------|----------------------------------------------------------------------|----------|------------------|---------------------------|------------------|
| CID002777 | SAXONIA Edelmetalle GmbH | Gold | Yes | GERMANY | No |
| CID001585 | SEMPA Joyeria Plateria S.A. | Gold | Yes | SPAIN | Unknown |
| CID002525 | Shandong Humon Smelting Co., Ltd. | Gold | Unknown | CHINA | Unknown |
| CID001619 | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | Gold | Unknown | CHINA | Unknown |
| CID001622 | Shandong Zhaojin Gold & Silver Refinery Co., Ltd. | Gold | Yes | CHINA | Unknown |
| CID001736 | Sichuan Tianze Precious Metals Co., Ltd. | Gold | Yes | CHINA | Unknown |
| CID002516 | Singway Technology Co., Ltd. | Gold | Yes | TAIWAN, PROVINCE OF CHINA | No |
| CID001756 | SOE Shyolkovsky Factory of Secondary Precious Metals | Gold | Yes | RUSSIAN FEDERATION | Unknown |
| CID001761 | Solar Applied Materials Technology Corp. | Gold | Yes | TAIWAN, PROVINCE OF CHINA | Unknown |
| CID003383 | Sovereign Metals | Gold | Unknown | INDIA | Unknown |
| CID003153 | State Research Institute Center for Physical Sciences and Technology | Gold | Unknown | LITHUANIA | Unknown |
| CID002567 | Sudan Gold Refinery ** | Gold | Unknown | SUDAN | Unknown |
| CID001798 | Sumitomo Metal Mining Co., Ltd. | Gold | Yes | JAPAN | Unknown |
| CID002918 | SungEel HiMetal Co., Ltd. | Gold | Yes | KOREA, REPUBLIC OF | No |
| CID002580 | T.C.A S.p.A | Gold | Yes | ITALY | Unknown |
| CID001875 | Tanaka Kikinzoku Kogyo K.K. | Gold | Yes | JAPAN | Unknown |
| CID001916 | The Refinery of Shandong Gold Mining Co., Ltd. | Gold | Yes | CHINA | Unknown |
| CID001938 | Tokuriki Honten Co., Ltd. | Gold | Yes | JAPAN | Unknown |
| CID001947 | Tongling Nonferrous Metals Group Co., Ltd. | Gold | Unknown | CHINA | Unknown |
| CID002587 | Tony Goetz NV | Gold | Unknown | BELGIUM | Unknown |
| CID002615 | TOO Tau-Ken-Altyn | Gold | Yes | KAZAKHSTAN | Unknown |
| CID001955 | Torecom | Gold | Yes | KOREA, REPUBLIC OF | No |
| CID001977 | Umicore Brasil Ltda. | Gold | Yes | BRAZIL | Unknown |
| CID002314 | Umicore Precious Metals Thailand | Gold | Yes | THAILAND | Unknown |
| CID001980 | Umicore S.A. Business Unit Precious Metals Refining | Gold | Yes | BELGIUM | Unknown |
| CID001993 | United Precious Metal Refining, Inc. | Gold | Yes | UNITED STATES OF AMERICA | No |
| CID002003 | Valcambi S.A. | Gold | Yes | SWITZERLAND | Unknown |
| CID002030 | Western Australian Mint (T/a The Perth Mint) | Gold | Yes | AUSTRALIA | Unknown |
| CID002778 | WIELAND Edelmetalle GmbH | Gold | Yes | GERMANY | No |
| CID002100 | Yamakin Co., Ltd. | Gold | Yes | JAPAN | No |
| CID002129 | Yokohama Metal Co., Ltd. | Gold | Yes | JAPAN | No |
| CID000197 | Yunnan Copper Industry Co., Ltd. | Gold | Unknown | CHINA | Unknown |
| CID002224 | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | Gold | Yes | CHINA | Unknown |
| CID000092 | Asaka Riken Co., Ltd. | Tantalum | Yes | JAPAN | No |
| CID000211 | Changsha South Tantalum Niobium Co., Ltd. | Tantalum | Yes | CHINA | No |
| CID003402 | CP Metals Inc. | Tantalum | Yes | UNITED STATES OF AMERICA | Unknown |
| CID002504 | D Block Metals, LLC | Tantalum | Yes | UNITED STATES OF AMERICA | No |
| CID000456 | Exotech Inc. | Tantalum | Yes | UNITED STATES OF AMERICA | No |
| CID000460 | F&X Electro-Materials Ltd. | Tantalum | Yes | CHINA | Yes |
| CID002505 | FIR Metals & Resource Ltd. | Tantalum | Yes | CHINA | No |
| CID002558 | Global Advanced Metals Aizu | Tantalum | Yes | JAPAN | No |
| CID002557 | Global Advanced Metals Boyertown | Tantalum | Yes | UNITED STATES OF AMERICA | Yes |
| CID000616 | Guangdong Zhiyuan New Material Co., Ltd. | Tantalum | Yes | CHINA | Yes |

| Smelter ID | Standard Smelter Name | Metal | Conflict Free? * | Smelter Facility Location | Source from DRC? |
|------------|---------------------------------------------------------------------------------------|----------|------------------|----------------------------------|------------------|
| CID002544 | H.C. Starck Co., Ltd. | Tantalum | Yes | THAILAND | Yes |
| CID002547 | H.C. Starck Hermsdorf GmbH | Tantalum | Yes | GERMANY | No |
| CID002548 | H.C. Starck Inc. | Tantalum | Yes | UNITED STATES OF AMERICA | No |
| CID002549 | H.C. Starck Ltd. | Tantalum | Yes | JAPAN | No |
| CID002550 | H.C. Starck Smelting GmbH & Co. KG | Tantalum | Yes | GERMANY | Yes |
| CID002545 | H.C. Starck Tantalum and Niobium GmbH | Tantalum | Yes | GERMANY | Yes |
| CID002492 | Hengyang King Xing Lifeng New Materials Co., Ltd. | Tantalum | Yes | CHINA | No |
| CID002512 | Jiangxi Dinghai Tantalum & Niobium Co., Ltd. | Tantalum | Yes | CHINA | No |
| CID002842 | Jiangxi Tuohong New Raw Material | Tantalum | Yes | CHINA | No |
| CID000914 | JiuJiang JinXin Nonferrous Metals Co., Ltd. | Tantalum | Yes | CHINA | Yes |
| CID000917 | Jiujiang Tanbre Co., Ltd. | Tantalum | Yes | CHINA | No |
| CID002506 | Jiujiang Zhongao Tantalum & Niobium Co., Ltd. | Tantalum | Yes | CHINA | No |
| CID002539 | KEMET Blue Metals | Tantalum | Yes | MEXICO | No |
| CID001076 | LSM Brasil S.A. | Tantalum | Yes | BRAZIL | No |
| CID001163 | Metallurgical Products India Pvt., Ltd. | Tantalum | Yes | INDIA | No |
| CID001175 | Mineracao Taboca S.A. | Tantalum | Yes | BRAZIL | No |
| CID001192 | Mitsui Mining and Smelting Co., Ltd. | Tantalum | Yes | JAPAN | No |
| CID001277 | Ningxia Orient Tantalum Industry Co., Ltd. | Tantalum | Yes | CHINA | No |
| CID001200 | NPM Silmet AS | Tantalum | Yes | ESTONIA | Yes |
| CID002847 | PRG Doel | Tantalum | Yes | NORTH MACEDONIA, REPUBLIC OF | No |
| CID001508 | QuantumClean | Tantalum | Yes | UNITED STATES OF AMERICA | No |
| CID002707 | Resind Industria e Comercio Ltda. | Tantalum | Yes | BRAZIL | No |
| CID001769 | Solikamsk Magnesium Works OAO | Tantalum | Yes | RUSSIAN FEDERATION | No |
| CID001869 | Taki Chemical Co., Ltd. | Tantalum | Yes | JAPAN | No |
| CID001891 | Telex Metals | Tantalum | Yes | UNITED STATES OF AMERICA | No |
| CID001969 | Ulba Metallurgical Plant JSC | Tantalum | Yes | KAZAKHSTAN | Yes |
| CID002508 | XinXing HaoRong Electronic Material Co., Ltd. | Tantalum | Yes | CHINA | No |
| CID001522 | Yanling Jincheng Tantalum & Niobium Co., Ltd. | Tantalum | Yes | CHINA | No |
| CID000292 | Alpha | Tin | Yes | UNITED STATES OF AMERICA | No |
| CID002703 | An Vinh Joint Stock Mineral Processing Company | Tin | Unknown | VIETNAM | Unknown |
| CID000228 | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | Tin | Yes | CHINA | No |
| CID003190 | Chifeng Dajingzi Tin Industry Co., Ltd. | Tin | Yes | CHINA | No |
| CID001070 | China Tin Group Co., Ltd. | Tin | Yes | CHINA | No |
| CID003356 | Dongguan CiEXPO Environmental Engineering Co., Ltd. | Tin | Unknown | CHINA | Unknown |
| CID000402 | Dowa | Tin | Yes | JAPAN | No |
| CID002572 | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | Tin | Unknown | VIETNAM | Unknown |
| CID000438 | EM Vinto | Tin | Yes | BOLIVIA (PLURINATIONAL STATE OF) | No |
| CID000448 | Estanho de Rondonia S.A. | Tin | Unknown | BRAZIL | Unknown |
| CID000468 | Fenix Metals | Tin | Yes | POLAND | No |
| CID003410 | Gejiu City Fuxiang Industry and Trade Co., Ltd. | Tin | Unknown | CHINA | Unknown |

| Smelter ID | Standard Smelter Name | Metal | Conflict Free? * | Smelter Facility Location | Source from DRC? |
|------------|----------------------------------------------------|-------|------------------|----------------------------------|------------------|
| CID000942 | Gejiu Kai Meng Industry and Trade LLC | Tin | Yes | CHINA | No |
| CID000538 | Gejiu Non-Ferrous Metal Processing Co., Ltd. | Tin | Yes | CHINA | No |
| CID001908 | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | Tin | Yes | CHINA | No |
| CID000555 | Gejiu Zili Mining And Metallurgy Co., Ltd. | Tin | Yes | CHINA | No |
| CID003116 | Guangdong Hanhe Non-Ferrous Metal Co., Ltd. | Tin | Yes | CHINA | No |
| CID002849 | Guanyang Guida Nonferrous Metal Smelting Plant | Tin | Yes | CHINA | No |
| CID002844 | HuiChang Hill Tin Industry Co., Ltd. | Tin | Yes | CHINA | No |
| CID000760 | Huichang Jinshunda Tin Co., Ltd. | Tin | Yes | CHINA | No |
| CID001231 | Jiangxi New Nanshan Technology Ltd. | Tin | Yes | CHINA | No |
| CID003387 | Luna Smelter, Ltd. | Tin | Yes | RWANDA | Unknown |
| CID003379 | Ma'anshan Weitai Tin Co., Ltd. | Tin | Yes | CHINA | No |
| CID002468 | Magnu's Minerais Metais e Ligas Ltda. | Tin | Yes | BRAZIL | No |
| CID001105 | Malaysia Smelting Corporation (MSC) | Tin | Yes | MALAYSIA | Yes |
| CID002500 | Melt Metais e Ligas S.A. | Tin | Yes | BRAZIL | No |
| CID001142 | Metallic Resources, Inc. | Tin | Yes | UNITED STATES OF AMERICA | No |
| CID002773 | Metallo Belgium N.V. | Tin | Yes | BELGIUM | No |
| CID002774 | Metallo Spain S.L.U. | Tin | Yes | SPAIN | No |
| CID001173 | Mineracao Taboca S.A. | Tin | Yes | BRAZIL | No |
| CID001182 | Minsur | Tin | Yes | PERU | No |
| CID001191 | Mitsubishi Materials Corporation | Tin | Yes | JAPAN | No |
| CID002858 | Modeltech Sdn Bhd | Tin | Unknown | MALAYSIA | Unknown |
| CID002573 | Nghe Tinh Non-Ferrous Metals Joint Stock Company | Tin | Unknown | VIETNAM | Unknown |
| CID001314 | O.M. Manufacturing (Thailand) Co., Ltd. | Tin | Yes | THAILAND | No |
| CID002517 | O.M. Manufacturing Philippines, Inc. | Tin | Yes | PHILIPPINES | No |
| CID001337 | Operaciones Metalurgicas S.A. | Tin | Yes | BOLIVIA (PLURINATIONAL STATE OF) | No |
| CID003208 | Pongpipat Company Limited | Tin | Unknown | MYANMAR | Unknown |
| CID003409 | Precious Minerals and Smelting Limited | Tin | Unknown | INDIA | Unknown |
| CID001399 | PT Artha Cipta Langgeng | Tin | Yes | INDONESIA | No |
| CID002503 | PT ATD Makmur Mandiri Jaya | Tin | Yes | INDONESIA | No |
| CID002835 | PT Menara Cipta Mulia | Tin | Yes | INDONESIA | Unknown |
| CID001453 | PT Mitra Stania Prima | Tin | Yes | INDONESIA | No |
| CID001460 | PT Refined Bangka Tin | Tin | Yes | INDONESIA | No |
| CID001477 | PT Timah Tbk Kundur | Tin | Yes | INDONESIA | No |
| CID001482 | PT Timah Tbk Mentok | Tin | Yes | INDONESIA | No |
| CID002706 | Resind Industria e Comercio Ltda. | Tin | Yes | BRAZIL | No |
| CID001539 | Rui Da Hung | Tin | Yes | TAIWAN, PROVINCE OF CHINA | No |
| CID001758 | Soft Metais Ltda. | Tin | Yes | BRAZIL | No |
| CID002756 | Super Ligas | Tin | Unknown | BRAZIL | Unknown |
| CID002834 | Thai Nguyen Mining and Metallurgy Co., Ltd. | Tin | Yes | VIETNAM | No |
| CID001898 | Thaisarco | Tin | Yes | THAILAND | Yes |
| CID003325 | Tin Technology & Refining | Tin | Yes | UNITED STATES OF AMERICA | No |
| CID002574 | Tuyen Quang Non-Ferrous Metals Joint Stock Company | Tin | Unknown | VIETNAM | Unknown |
| CID002036 | White Solder Metalurgia e Mineracao Ltda. | Tin | Yes | BRAZIL | No |
| CID002158 | Yunnan Chengfeng Non-ferrous Metals Co., Ltd. | Tin | Yes | CHINA | No |
| CID002180 | Yunnan Tin Company Limited | Tin | Yes | CHINA | No |

| Smelter ID | Standard Smelter Name | Metal | Conflict Free? * | Smelter Facility Location | Source from DRC? |
|------------|---------------------------------------------------------------|----------|------------------|---------------------------|------------------|
| CID003397 | Yunnan Yunfan Non-ferrous Metals Co., Ltd. | Tin | Yes | CHINA | No |
| CID000004 | A.L.M.T. Corp. | Tungsten | Yes | JAPAN | No |
| CID002833 | ACL Metais Eireli | Tungsten | Yes | BRAZIL | No |
| CID003427 | Albasteel Industria e Comercio de Ligas Para Fundicao Ltd. | Tungsten | Unknown | BRAZIL | Unknown |
| CID002502 | Asia Tungsten Products Vietnam Ltd. | Tungsten | Yes | VIETNAM | Yes |
| CID002513 | Chenzhou Diamond Tungsten Products Co., Ltd. | Tungsten | Yes | CHINA | No |
| CID002641 | China Molybdenum Co., Ltd. | Tungsten | Unknown | CHINA | Unknown |
| CID000258 | Chongyi Zhangyuan Tungsten Co., Ltd. | Tungsten | Yes | CHINA | No |
| CID000281 | CNMC (Guangxi) PGMA Co., Ltd. | Tungsten | Unknown | CHINA | Unknown |
| CID003448 | CP Metals Inc. | Tungsten | Unknown | UNITED STATES OF AMERICA | Unknown |
| CID003401 | Fujian Ganmin RareMetal Co., Ltd. | Tungsten | Yes | CHINA | No |
| CID000499 | Fujian Jinxin Tungsten Co., Ltd. | Tungsten | Yes | CHINA | No |
| CID002645 | Ganzhou Haichuang Tungsten Co., Ltd. | Tungsten | Yes | CHINA | No |
| CID000875 | Ganzhou Huaxing Tungsten Products Co., Ltd. | Tungsten | Yes | CHINA | No |
| CID002315 | Ganzhou Jiangwu Ferrotungsten Co., Ltd. | Tungsten | Yes | CHINA | No |
| CID002494 | Ganzhou Seadragon W & Mo Co., Ltd. | Tungsten | Yes | CHINA | No |
| CID000568 | Global Tungsten & Powders Corp. | Tungsten | Yes | UNITED STATES OF AMERICA | No |
| CID000218 | Guangdong Xianglu Tungsten Co., Ltd. | Tungsten | Yes | CHINA | No |
| CID002542 | H.C. Starck Smelting GmbH & Co. KG | Tungsten | Yes | GERMANY | No |
| CID002541 | H.C. Starck Tungsten GmbH | Tungsten | Yes | GERMANY | No |
| CID000766 | Hunan Chenzhou Mining Co., Ltd. | Tungsten | Yes | CHINA | No |
| CID002579 | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji | Tungsten | Yes | CHINA | No |
| CID000769 | Hunan Chunchang Nonferrous Metals Co., Ltd. | Tungsten | Yes | CHINA | No |
| CID003182 | Hunan Litian Tungsten Industry Co., Ltd. | Tungsten | Yes | CHINA | No |
| CID002649 | Hydrometallurg, JSC | Tungsten | Yes | RUSSIAN FEDERATION | No |
| CID000825 | Japan New Metals Co., Ltd. | Tungsten | Yes | JAPAN | No |
| CID002551 | Jiangwu H.C. Starck Tungsten Products Co., Ltd. | Tungsten | Yes | CHINA | No |
| CID002321 | Jiangxi Gan Bei Tungsten Co., Ltd. | Tungsten | Yes | CHINA | No |
| CID002313 | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. | Tungsten | Unknown | CHINA | Unknown |
| CID002318 | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | Tungsten | Yes | CHINA | No |
| CID002647 | Jiangxi Xianglu Tungsten Co., Ltd. | Tungsten | Unknown | CHINA | Unknown |
| CID002317 | Jiangxi Xincheng Tungsten Industry Co., Ltd. | Tungsten | Yes | CHINA | No |
| CID002316 | Jiangxi Yaosheng Tungsten Co., Ltd. | Tungsten | Yes | CHINA | No |
| CID003408 | JSC "Kirovgrad Hard Alloys Plant" | Tungsten | Unknown | RUSSIAN FEDERATION | Unknown |
| CID000966 | Kennametal Fallon | Tungsten | Yes | UNITED STATES OF AMERICA | No |
| CID000105 | Kennametal Huntsville | Tungsten | Yes | UNITED STATES OF AMERICA | No |
| CID003388 | KGETS Co., Ltd. | Tungsten | Yes | KOREA, REPUBLIC OF | No |
| CID003407 | Lianyou Metals Co., Ltd. | Tungsten | Yes | TAIWAN, PROVINCE OF CHINA | No |
| CID002319 | Malipo Haiyu Tungsten Co., Ltd. | Tungsten | Yes | CHINA | No |
| CID002543 | Masan Tungsten Chemical LLC (MTC) | Tungsten | Yes | VIETNAM | No |
| CID002845 | Moliren Ltd. | Tungsten | Yes | RUSSIAN FEDERATION | No |

| Smelter ID | Standard Smelter Name | Metal | Conflict Free? * | Smelter Facility Location | Source from DRC? |
|------------|-------------------------------------------------------------|----------|------------------|---------------------------|------------------|
| CID002589 | Niagara Refining LLC | Tungsten | Yes | UNITED STATES OF AMERICA | No |
| CID002827 | Philippine Chuangxin Industrial Co., Inc. | Tungsten | Yes | PHILIPPINES | No |
| CID001889 | Tejing (Vietnam) Tungsten Co., Ltd. | Tungsten | Yes | VIET NAM | No |
| CID002724 | Unecha Refractory metals plant | Tungsten | Yes | RUSSIAN FEDERATION | No |
| CID002044 | Wolfram Bergbau und Hutten AG | Tungsten | Yes | AUSTRIA | No |
| CID002843 | Woltech Korea Co., Ltd. | Tungsten | Yes | KOREA, REPUBLIC OF | No |
| CID002320 | Xiamen Tungsten (H.C.) Co., Ltd. | Tungsten | Yes | CHINA | Yes |
| CID002082 | Xiamen Tungsten Co., Ltd. | Tungsten | Yes | CHINA | No |
| CID002830 | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd. | Tungsten | Yes | CHINA | No |
| CID002095 | Xinhai Rendan Shaoguan Tungsten Co., Ltd. | Tungsten | Yes | CHINA | No |

* = SOR certified as conflict free by the Responsible Minerals Initiative or an equivalent independent third party certification program during reporting period 2019.

** = SOR identified as posing a high risk of sourcing from mines benefiting armed groups engaged in conflict in the DRC Region during reporting period 2019.