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

FORM SD
SPECIALIZED DISCLOSURE REPORT

SolarEdge Technologies Inc.
(Exact name of registrant as specified in its charter)

Delaware
(State or other jurisdiction of incorporation)

001-36894
(Commission file number)

1 HaMada Street
Herziliya Pituach, Israel
(Address of principal executive offices)

4673335
(Zip code)

Ronen Faier
972 (9) 957-6620
(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:

- Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2023.
- Rule 13q-1 under the Securities Exchange Act (17 CFR 240.13q-1) for the fiscal year ended.
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Section 1 - Conflict Minerals Disclosures

Item 1.01 and 1.02 Conflict Minerals Disclosure and Report

SolarEdge Technologies, Inc. (the “Company”) evaluated its current products and determined that certain products it manufactures or contracts to manufacture contain conflict minerals originating in the Democratic Republic of the Congo or adjoining countries. As a result, the Company has prepared, and is filing with this Form, a Conflict Minerals Report.

A copy of the Company’s Conflict Minerals Report for the calendar year ended December 31, 2023 is provided as Exhibit 1.01 to the Specialized Disclosure Report and is publicly available on the Company’s corporate website at <http://investors.solaredge.com/phoenix.zhtml?c=253935&p=irol-govHighlights>

Section 2 – Resource Extraction Issuer Disclosure

Item 2.01 Resource Extraction Issuer Disclosure and Report

Not applicable.

Section 3 – Exhibits

Item 3.01 Exhibits

| Exhibit Number | Description |
|---------------------------|--------------------|
|---------------------------|--------------------|

| | |
|----------------------|---|
| 1.01 | Conflicts Minerals Report for the reporting period January 1, 2023 to December 31, 2023 |
|----------------------|---|

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.

SolarEdge Technologies Inc.

By: */s/ Rachel Prishkolnik*
Rachel Prishkolnik
VP General Counsel & Corporate Secretary

Dated: May 31, 2024



SolarEdge Technologies, Inc.

Conflict Minerals Report For the calendar year ended December 31, 2023

1. Introduction

SolarEdge Technologies, Inc., together with its wholly-owned subsidiaries (“SolarEdge” or the “Company,” “we,” “our” or “us”), has prepared this Conflict Minerals Report pursuant to Rule 13p-1 under the Securities Exchange Act of 1934 and the requirements of Form SD (collectively, the “Rule”).

We are a leading provider of an optimized inverter solution that changed the way power is harvested and managed in photovoltaic (also known as PV) systems. Our direct current or DC, optimized inverter system maximizes power generation while lowering the cost of energy produced by the PV system, for improved return on investment, or RoI. Additional benefits of the DC optimized inverter system include comprehensive and advanced safety features, improved design flexibility, and improved operating and maintenance, or O&M, with module-level and remote monitoring. The typical SolarEdge optimized inverter system consists of inverters, power optimizers, a communication device which enables access to a cloud-based monitoring platform and in many cases, additional smart energy management solutions. Our solutions address a broad range of solar market segments, from residential solar installations to commercial and small utility scale solar installations.

Since introducing the optimized inverter solution in 2010, SolarEdge has expanded its activity to other areas of smart energy technology, both through organic growth and through acquisitions. By leveraging world-class engineering capabilities and with a relentless focus on innovation, SolarEdge now offers energy solutions which include not only residential, commercial, and large-scale PV systems but also product offerings in the areas of residential batteries, energy storage systems, or ESS, and backup, electric vehicle, or EV components and charging capabilities, home energy management, grid services and virtual power plants and lithium-ion batteries.

We were founded in 2006 and began commercial shipments in 2010. As of December 31, 2023, we have shipped in the aggregate approximately 125.1 million power optimizers, and 5.6 million inverters. Over 3.7 million installations, many of which may include multiple inverters, are currently connected to, and monitored through, our cloud-based monitoring platform. Our products have been installed in solar PV systems in 140 countries.

2. Overview; Applicability of Conflict Minerals Rule to SolarEdge

SolarEdge has performed an internal assessment and determined that certain Conflict Minerals are necessary to the functionality or production of our products. Accordingly, for the purposes of this assessment, all of the products that were in production in the calendar year 2023 were considered (the “Covered Products”).

SolarEdge is several levels removed from the mining of minerals (Conflict Minerals or otherwise). We also do not make purchases of raw ore or unrefined minerals and make no purchases in the Democratic Republic of Congo (“DRC”) or an adjoining country (together, the “Covered Countries”). SolarEdge therefore has limited influence over the sourcing of the necessary Conflict Minerals in the products that it manufactures or contracts to manufacture (we sometimes refer herein to these products that contain necessary Conflict Minerals as “in-scope products”). In addition, due to its position in the supply chain, SolarEdge depends upon its suppliers for information concerning the origin of the Conflict Minerals contained in its in-scope products. However, through the efforts described in this Conflict Minerals Report, SolarEdge seeks to ensure that its suppliers source responsibly. Minerals including tantalum, tin, tungsten and gold (“3TG”) are classified as “Conflict Minerals” and are necessary to the functionality or production of certain products that we manufacture or contract to manufacture. As such, we are subject to the Rule with respect to those necessary Conflict Minerals. The Rule requires us to conduct in good faith a reasonable country of origin inquiry (“RCOI”) into those necessary Conflict Minerals to determine whether they originated in the Covered Countries or are from recycled or scrap sources. If, as a result of our RCOI procedures, we know that any of our necessary Conflict Minerals originated in a covered country and are not from recycled or scrap materials, or if we have reason to believe that our necessary Conflict Minerals may have originated in a covered country and have reason to believe that they may not be from recycled or scrap sources, then we are required to exercise due diligence to determine the source and chain of custody of such Conflict Minerals to conclude if they are DRC conflict-free or not.

3. Description of Product Identification and RCOI Processes

We have concluded that, during the 2023 calendar year, we have manufactured and contracted to manufacture products containing certain Conflict Minerals that were necessary to the functionality or production of such products. As such, we conducted an RCOI process to determine whether any of the Conflict Minerals originated, or may have originated, in the Covered Countries and whether such Conflict Minerals originated from recycled or scrap sources.

We conducted an assessment to determine which of our direct suppliers may be providing components of our products that are likely to contain Conflict Minerals. We employed a collaborative process to identify the applicable list of components and suppliers to focus our efforts, consulting with members of our supply chain department including suppliers, senior management and other individuals familiar with the manufacturing and component sourcing processes. We verified with such personnel that the population of components and suppliers was complete and comprehensive for our 2023 products. We then identified the list of suppliers that we directly procured materials from (“tier one” or “direct” suppliers) to survey. This list includes suppliers that supplied components to our third-party equipment manufacturers on our behalf and those suppliers from whom we purchased components directly, all between January 1, 2023 and December 31, 2023.

We used a Conflict Minerals Reporting Template (the “CMRT” or the “Template”), which was developed by the Responsible Minerals Initiative (RMI) (formerly the Conflict-Free Sourcing Initiative) to facilitate disclosure and communication of information regarding smelters that provide material to a company’s supply chain. Our RCOI consisted of surveying tier one suppliers confirmed to have supplied products or components to us that contain Conflict Minerals that are used to manufacture our products.

SolarEdge identified 726 suppliers (the “Suppliers”) that provided components for products manufactured during the calendar year 2023. Of those Suppliers, SolarEdge’s outreach was to all suppliers that provided components, parts or products that SolarEdge determined contained or potentially contained necessary Conflict Minerals. In connection with its scoping determination, SolarEdge reviewed product specifications, supply chain records and bills of material, made internal engineering and supplier inquiries, commissioned Assent Compliance (“Assent”), an independent third-party consultant, and made use of other information known to it regarding the materials composition of its products. Suppliers providing submissions that include smelters of high risk are instructed to undertake an independent risk mitigation. Examples include a submission of a product level CMRT to better identify the connection to products that they supply to SolarEdge. Suppliers are given clear performance objectives and reasonable timeframes with the goal of eliminating smelters of concern from the supply chain. In addition, suppliers are guided to educational resources on mitigating risk identified through the CMRT collection process.

SolarEdge is a part of an industry-wide outreach initiative targeting smelters and refiners who have not participated in an industry recognized responsible minerals audit/assessment program. Through this initiative, which is operated by our responsible sourcing vendor, Assent, along with over 100 downstream (by several tiers) customers, and encourage to participate in a recognized program, in order to assure their responsible conduct.

4. Reasonable Country of Origin Inquiry (RCOI)

As required by the Rule, SolarEdge conducted a “reasonable country of origin inquiry” with respect to calendar year 2023. Our outreach included 726 suppliers that provided components, parts or products that SolarEdge determined contained or potentially contained necessary Conflict Minerals incorporated into products manufactured by us. In connection with this examination, SolarEdge reviewed product specifications, supply chain records and bills of material, made internal engineering and supplier inquiries and utilized other information known to us regarding the materials composition of our products.

In order to identify the source of those components, parts and products, SolarEdge sent letters to its suppliers, informing them of the Rule and SolarEdge's policy on Conflict Minerals, asking them to comply with the Rule. We also requested that suppliers upload completed CMRTs versions 6.22, 6.3 and 6.31 directly to ACM, a software-as-a-service (SaaS) platform provided by Assent that enables users to complete and track supplier communications, for validation, assessment and management. The goal of data validation is to increase the accuracy of submissions and identify any contradictory answers in the CMRT. The results of data validation contribute to the program’s health assessment and are shared with the suppliers to ensure they understand areas that require further clarifications or improvement. Training and education to guide suppliers on best practices and use of the CMRT template was included. Since some suppliers may remain unresponsive to feedback, we track program gaps to account for future improvement opportunities. We also enabled suppliers to contact SolarEdge directly and provide a CMRT report using versions 6.22, 6.3 and 6.31. We used these methods to query and transmit sourcing information along the supply chain. The CMRT includes questions regarding a company’s conflict-free policy, engagement with its direct suppliers, and a listing of the smelters the company and its suppliers use. The total number of Suppliers who delivered satisfactory CMRT was 352.

We compared the smelters and refiners identified in the surveys against the lists of facilities which have received a conflict free designation by the Responsible Minerals Assurance Process (“RMAP”), a program of RMI, or other independent third-party audit program. We rely on the RMAP as an independent third-party audit solution through which mineral sources are identified and independently evaluated. We do not have a direct relationship with smelters and refiners, and do not perform direct audits of these entities within the supply chain.

When suppliers provided us with chain surveys containing incomplete or potentially inaccurate information, we followed up with such suppliers to seek additional clarifying information. Unresponsive suppliers were contacted on a regular basis both by automatic emails, manual outreach, and in certain nonresponsive cases, through telephone.

For 2023, SolarEdge identified 369 smelters and refiners that processed or may have processed the necessary Conflict Minerals contained in our in-scope products, as described in the Smelter and Refiner list attached as Annex A as well as in the Country-of-Origin Information attached as Annex B.

Pursuant to the Conflict Minerals Rule, based on the results of its reasonable country of origin inquiry, SolarEdge was required to conduct due diligence for 2023. Because we were unable to identify the source of all products in our supply chain, our reasonable country of origin inquiry utilized the same processes and procedures as our due diligence. These processes and procedures are described below.

5. Due Diligence

Design of Due Diligence

SolarEdge utilizes due diligence measures relating to Conflict Minerals that are intended to conform with, in all material respects, the criteria set forth in the Organization for Economic Co-operation and Development’s Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including the Supplement on Tin, Tantalum and Tungsten and the Supplement on Gold (Third Edition 2016) (the “OECD Guidance”). The OECD Guidance has established a five-step framework for due diligence as a basis for responsible global supply chain management of minerals from conflict-affected and high-risk areas. Our Conflict Minerals due diligence process includes: a Conflict Minerals Policy, a governance charter with cross-functional internal compliance team, from our legal, purchasing, environmental health, safety departments, and senior executives. This internal compliance team is responsible for working with our third party auditors, communicating with suppliers, undertaking the due diligence compliance process and measurement, record-keeping and escalation procedures. We report to the Audit Committee and the Board of Directors with respect to our due diligence process and compliance obligations. Selected elements of our program design are discussed below.

Due Diligence Performed

Step 1: Establish Strong Company Management Systems

In 2021 we published our supplier code of conduct ("SCoC"), which includes provisions regarding, among others, ethics, safety, environmental protection, human rights, and fair employment. As of April 2024, over 230 active key suppliers have signed their acknowledgment of the SCoC terms. SolarEdge has also adopted a Conflict Mineral Policy which provides further clarification to the principles of the SCoC Code of Conduct and SolarEdge's human rights approach regarding illegal trade of natural resources.

SolarEdge's Code of Conduct defines the company's overall principles and commitment towards legal compliance, ethical conduct, human rights, anti-corruption work and environmental protection. These high expectations extend to SolarEdge's partners, subcontractors and suppliers, whom we encourage to strive beyond merely fulfilling legal compliance. SolarEdge has adopted a Conflict Mineral Policy which provides further clarification to the principles of the Code of Conduct and SolarEdge's human rights approach regarding illegal trade of natural resources.

As part of our policy, SolarEdge is committed to respect human rights and the environment in accordance with accepted international conventions and practices, and we strive to ensure that all materials used in our products come from socially and environmentally responsible sources.

We communicate our policy to our suppliers, and it is available at http://media.corporate-ir.net/media_files/IROL/25/253935/SolarEdge_CM%20Policy_comments_%20v7%20clean.pdf (the "Conflict Minerals Policy"). In addition, in support of our compliance efforts, we have established a steering committee for enforcement of this Conflict Minerals Policy. The steering committee team consists of senior staff under SolarEdge's legal department, supply chain management group and core technologies. The team members have been made aware of the Conflict Minerals Rule, the OECD Guidance, SolarEdge's Conflict Minerals Policy and governance charter and have established SolarEdge's procedures for reviewing and validating supplier responses to its inquiries.

The SolarEdge Conflict Minerals Policy includes a grievance mechanism whereby employees and suppliers can report suspected violations of the policy.

SolarEdge also utilizes an independent third-party consultant to advise it on certain aspects of its compliance, as well as a third-party software provider as a basis to enhance the supplier data collection process and help minimize responsible sourcing risks.

The following steps have also been adopted:

1. Implementing a system of controls and transparency over the mineral supply chain through the use of the CMRT.
2. Maintaining records relating to our Conflict Minerals program for 5 years. We store all of the information and findings in a database that can be audited by internal or external parties.
3. Implementing standard contract language requiring suppliers to agree to timely respond and conduct an appropriate due diligence inquiry following any request by SolarEdge for information on any goods delivered containing Conflict Minerals, as defined under the Rule.

Step 2. Identify and Assess Risks in the Supply Chain

To assist us with our supply chain due diligence, we engaged an independent third-party consultant for conducting outreach to our Suppliers and archiving responses from Suppliers. We conducted a supply chain survey requesting direct suppliers to identify smelters and refiners and country of origin, through use of the Template.

We, in conjunction with our independent third-party consultant, reviewed our entire known component and outsourced manufacturing supply chain for the calendar year 2023, which consisted of approximately 814 suppliers. Our outreach included 726 Suppliers that provided components, parts or products that were determined by SolarEdge to contain or potentially contain necessary Conflict Minerals and that were incorporated into products manufactured by us. The responses were reviewed against criteria developed internally and, where necessary, we reached out for further engagement and to receive additional information from our suppliers. These criteria included untimely or incomplete responses, as well as inconsistencies within the data reported in the Template. We worked directly with these suppliers to receive revised responses.

We compared the RMI validated smelter list against those smelters identified by our suppliers and, as described in our Conflict Minerals Policy, SolarEdge does not purchase Conflict Minerals directly from mines, smelters or refiners. Tracing minerals to their sources is a challenge that requires us to rely on our suppliers in our efforts to achieve supply chain transparency, including for obtaining information regarding the origin of the Conflict Minerals.

Risk mitigation activities are initiated whenever a supplier's CMRT reports a facility of concern. Suppliers with submissions that included any smelters of concern were immediately provided with feedback instructing the supplier to take their own independent risk mitigation activities. Examples include a submission of a product level CMRT to better identify the connection to products that they supply to SolarEdge. Suppliers are given clear performance objectives and within reasonable timeframes with the ultimate goal of elimination of smelters of concern from the supply chain. In addition, suppliers are guided to the educational resources on mitigating the risk identified through the CMRT collection process.

Step 3. Design and Implement a Strategy to Respond to Identified Risks

We work with a significant number of suppliers and they are diverse in terms of size. Based on our research from publicly available data, 64 of our 371 Suppliers that replied, (or 17.2%), are also SEC registrants and subject to the Rule. After SolarEdge receives CMRT responses from Suppliers, it reviews the responses. SolarEdge follows up with Suppliers whose CMRT appears to be incomplete or contain errors or inaccuracies, requesting that the Supplier submit a revised response. For illustration purposes, the following are some of the steps that SolarEdge takes in this process: 1) verifying smelters according to RMI smelters list; 2) validating questions in the CMRT file and ensuring that the answers are logical and reasonable, and 3) verifying and cross checking between the smelter location and the RMI smelter approved list. Any smelter's location in the DRC which is not RMI approved is flagged for further review.

If a completed CMRT indicates a smelter or refiner, SolarEdge reviews this information against the Standard Smelter Names tab of the CMRT and the lists of "compliant" and "active" smelters and refiners published by the RMI. If an indicated smelter or refiner is not listed on the Standard Smelter Names tab or the Commerce Department List, or listed as compliant by the RMI, SolarEdge requests the assistance of the supplier or contacts the listed entity to attempt to determine whether that entity is actually a smelter or refiner, the mine or location of origin of the Conflict Minerals processed by the smelter or refiner and whether it is known to obtain Conflict Minerals from sources that directly or indirectly finance or benefit armed groups in any of the Covered Countries.

As part of our risk assessment, SolarEdge identified three potential smelters in the supply chains of SolarEdge suppliers as high-risk during the 2023 survey and due diligence process because of a lack of audit validation and/or otherwise considered high risk. This determination was based upon information gathered from the CMRT and the RMI database, analysis by Assent, and independent research. We contacted each supplier that reported smelters deemed as high-risk to gather additional information on which of their suppliers reported these smelters and whether those suppliers were providing material for products sold to SolarEdge, and we were unable to confirm that these smelters were in our product supply chain.

SolarEdge monitors smelter and refiner validation progress by the RMI or other cross-recognized smelter and refiner responsible sourcing audit programs. If suppliers or smelter and refiners fail to meet SolarEdge's standards, we communicate the need to improve, in accordance with the framework of progressive improvement under the OECD Guidance. Any concerns with supplier responses throughout the data collection process are brought to the attention of Solar Edge's internal compliance team for further review and action.

In alignment with OECD Guidance, SolarEdge shares the names of smelter and refiners provided to us that have not been validated to the RMI for validation and audit. To help determine the reasonable country of origin for the 3TG in our supply chain, we continue to monitor and rely upon the RMI's progress in identifying and validating smelter and refiners.

SolarEdge reports back to senior management, summarizing our risk mitigation efforts.

Step 4. Independent Third-Party Audit of Smelter/Refiner's Due Diligence Practices

SolarEdge does not have a direct relationship with 3TG smelters and refiners. As a result, SolarEdge does not perform direct audits of these entities within its supply chain, but rather relies on due diligence performed by organizations such as the Responsible Minerals Assurance Process ("RMAP"). Our independent third-party service provider, Assent, also directly contacted smelters and refiners that are not currently enrolled in the RMAP to encourage their participation and gather information regarding each facilities' sourcing practices on behalf of its compliance partners. SolarEdge is a signatory of this communication in accordance with the requirements of downstream companies detailed in the OECD Guidance.

Step 5. Report Annually on Supply Chain Due Diligence

SolarEdge files a Form SD and, to the extent required, a Conflict Minerals Report, with the Securities and Exchange Commission and makes these filings publicly available on the Company's corporate website at <https://investors.solaredge.com/search?query=conflict+minerals&op=Search>

6. Results of Assessment

Based on the information obtained through the due diligence process described above, we do not have sufficient information to determine the products containing Conflict Minerals and/or the country of origin of the Conflict Minerals in those products and/or the facilities used to process Conflict Minerals in those products.

Tracing minerals back to the mine of origin is a complex aspect of responsible sourcing in our supply chain. By adopting methodology outlined by the RMI's joint industry programs and outreach initiatives and requiring that our Suppliers conform with standards that meet the OECD guidelines and report to us using the Template, we have determined that seeking information about 3TG smelters and refiners in our supply chain represents the most reasonable effort we can make to determine the mines or location of origin of the 3TG in our supply chain and responses to such inquiries represent the most reasonable source information available. Through this joint industry effort, we have made reasonable efforts to make a reasonable determination of the mines or locations of origin of the 3TG in our supply chain. We were unable, however, to ascertain the specific country of origin and/or chain of custody of all necessary Conflict Minerals processed by the facilities that contributed to our Covered Products.

SolarEdge approached 726 suppliers and 364 suppliers (or 50.1% responded). Out of these:

Number of suppliers who provided data at a company level: 279 (76.6%)

Number of suppliers who provided data at a product level: 63 (17.3%)

Number of suppliers which provided data according to a custom-made description: 22 (6.0%)

Number of suppliers which were classified as "Free no 3TG": 115 (31.5%)

Number of suppliers which were classified as "Non-DRC 3TGs": 114 (31.2%)

Number of suppliers which were classified as "DRC conflict free" (from DRC, all SORs are certified): 84 (23.0%)

Number of suppliers which were classified as "DRC Conflict Undeterminable": 52 (14.2%)

A smelter and refiner list attached as Annex A and corresponding country of origin information is attached as Annex B.

Smelters and refiners verified as conflict-free or in the audit process (232):

| | Conformant & Active | Total |
|--------------|---------------------|------------|
| Tin | 70 (79.5%) | 88 |
| Tantalum | 34 (94.4%) | 36 |
| Tungsten | 35 (66.0%) | 53 |
| Gold | 93 (53.4%) | 174 |
| Total | 232 (66.1%) | 351 |

Status of identified smelters and refiners:

| RMI Audit Status | Amount | Percentage |
|--|------------|---------------|
| Active | 8 | 2.2% |
| Communication Suspended - Not Interested | 7 | 1.9% |
| Conformant | 232 | 64.1% |
| In Communication | 1 | 0.3% |
| Non-Conformant | 30 | 8.3% |
| Outreach Required | 62 | 17.1% |
| RMI Due Diligence Review - Unable to Proceed | 22 | 6.1% |
| Total | 362 | 100.0% |

7. Improvement to Mitigate Risks

As we further develop our due diligence program, we intend to enhance supplier communication and escalation processes to improve due diligence data accuracy and completion and continue to influence additional smelters to be designated as “conflict-free”, where possible. To the extent we are not able to determine in the future that we are sourcing from non-conflict-free smelters, we plan to move toward using conflict-free smelters within a reasonable time frame. We also intend to request of any of our suppliers, that we have reason to believe are supplying us with 3TG from sources that may support conflict in the Covered Countries that they establish an alternative source of 3TG that does not support such conflict, as provided in the OECD guidance.

We understand that supply chain due diligence is a dynamic process and requires on-going risk monitoring. Therefore, after implementing our risk mitigation strategy, SolarEdge intends to go back to Step 2 of the OECD guidelines to ensure effective management of risks.

Cautionary Note on Forward-Looking Statements

This Report contains forward-looking statements within the meaning of Section 21E of the Securities Exchange Act of 1934, as amended, and other federal securities laws. Investors are cautioned that statements in this Report that are not strictly historical statements, including without limitation, SolarEdge’s intentions, expectations, and future results regarding further supplier engagement, and risk mitigation efforts and strategy, constitute forward-looking statements that involve risks and uncertainties. Actual results could differ materially from the forward-looking statements. Risks and uncertainties that could cause actual results to differ include, without limitation, risks and uncertainties associated with the progress of industry and other supply chain transparency, and smelter or refiner validation programs for Conflict Minerals (including the possibility of inaccurate information, fraud and other irregularities), inadequate supplier education and knowledge, limitations on the ability or willingness of suppliers to provide more accurate, complete, and detailed information, and limitations on SolarEdge’s ability to verify the accuracy or completeness of any information received from Suppliers or others.

| Smelter Name | RMI Smelter Id | Metal | Smelter Facility Location (Country) | Audit Status |
|---|----------------|----------|-------------------------------------|-------------------|
| A.L.M.T. Corp. | CID000004 | Tungsten | Japan | Conformant |
| Advanced Chemical Company | CID000015 | Gold | United States Of America | Active |
| Aida Chemical Industries Co., Ltd. | CID000019 | Gold | Japan | Conformant |
| Agosi AG | CID000035 | Gold | Germany | Conformant |
| Almalyk Mining and Metallurgical Complex (AMMC) | CID000041 | Gold | Uzbekistan | Conformant |
| AngloGold Ashanti Corrego do Sitio Mineracao | CID000058 | Gold | Brazil | Conformant |
| Argor-Heraeus S.A. | CID000077 | Gold | Switzerland | Conformant |
| Asahi Pretec Corp. | CID000082 | Gold | Japan | Conformant |
| Asaka Riken Co., Ltd. | CID000090 | Gold | Japan | Conformant |
| Atasay Kuyumculuk Sanayi Ve Ticaret A.S. | CID000103 | Gold | Turkey | Outreach Required |
| Kennametal Huntsville | CID000105 | Tungsten | United States Of America | Conformant |
| Aurubis AG | CID000113 | Gold | Germany | Conformant |
| Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | CID000128 | Gold | Philippines | Conformant |
| Boliden AB | CID000157 | Gold | Sweden | Conformant |
| C. Hafner GmbH + Co. KG | CID000176 | Gold | Germany | Conformant |
| Caridad | CID000180 | Gold | Mexico | Outreach Required |
| CCR Refinery - Glencore Canada Corporation | CID000185 | Gold | Canada | Conformant |
| Cendres + Metaux S.A. | CID000189 | Gold | Switzerland | Non Conformant |
| Yunnan Copper Industry Co., Ltd. | CID000197 | Gold | China | Outreach Required |
| Guangdong Xianglu Tungsten Co., Ltd. | CID000218 | Tungsten | China | Conformant |
| Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | CID000228 | Tin | China | Conformant |
| Chimet S.p.A. | CID000233 | Gold | Italy | Conformant |

¹ Certain of our suppliers reported the presence of the following SORs in their supply chains: African Gold Refinery, which was sanctioned by the United States Department of Treasury, Office of Foreign Assets Control (“OFAC”) on March 17, 2022, JSC Uralelectromed, which was sanctioned by OFAC on July 20, 2023, and OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet), which was sanctioned in the United Kingdom on November 8, 2023. Because of the over-reporting nature of the industry CMRT information collection process, and the nature of our supply chains, we are unable to confirm whether these, or any, specific SORs are or were active in our supply chains. Our policy is to comply with all applicable sanctions laws, and we do not have any direct transactions or contractual relationships, nor are we, to the best of our knowledge, engaging in indirect transactions, with these entities.

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|---|-----------|----------|----------------------------------|--|
| Chongyi Zhangyuan Tungsten Co., Ltd. | CID000258 | Tungsten | China | Conformant |
| Chugai Mining | CID000264 | Gold | Japan | Conformant |
| CNMC (Guangxi) PGMA Co., Ltd. | CID000281 | Tungsten | China | Outreach Required |
| Guangdong Rising Rare Metals-EO Materials Ltd. | CID000291 | Tantalum | China | Conformant |
| Alpha | CID000292 | Tin | United States Of America | Conformant |
| PT Aries Kencana Sejahtera | CID000309 | Tin | Indonesia | Conformant |
| PT Premium Tin Indonesia | CID000313 | Tin | Indonesia | Conformant |
| Daye Non-Ferrous Metals Mining Ltd. | CID000343 | Gold | China | Outreach Required |
| DSC (Do Sung Corporation) | CID000359 | Gold | Korea, Republic Of | Conformant |
| Dowa | CID000401 | Gold | Japan | Conformant |
| Dowa | CID000402 | Tin | Japan | Conformant |
| Eco-System Recycling Co., Ltd. East Plant | CID000425 | Gold | Japan | Conformant |
| EM Vinto | CID000438 | Tin | Bolivia (Plurinational State Of) | Conformant |
| Estanho de Rondonia S.A. | CID000448 | Tin | Brazil | Conformant |
| F&X Electro-Materials Ltd. | CID000460 | Tantalum | China | Conformant |
| Fenix Metals | CID000468 | Tin | Poland | Conformant |
| JSC Novosibirsk Refinery | CID000493 | Gold | Russian Federation | RMI Due Diligence Review - Unable to Proceed |
| Refinery of Seemine Gold Co., Ltd. | CID000522 | Gold | China | Outreach Required |
| Gejiu Non-Ferrous Metal Processing Co., Ltd. | CID000538 | Tin | China | Conformant |
| Gejiu Zili Mining And Metallurgy Co., Ltd. | CID000555 | Tin | China | Non Conformant |
| Global Tungsten & Powders LLC | CID000568 | Tungsten | United States Of America | Conformant |
| XIMEI RESOURCES (GUANGDONG) LIMITED | CID000616 | Tantalum | China | Conformant |
| Guoda Safina High-Tech Environmental Refinery Co., Ltd. | CID000651 | Gold | China | Outreach Required |
| Hangzhou Fuchunjiang Smelting Co., Ltd. | CID000671 | Gold | China | Outreach Required |
| LT Metal Ltd. | CID000689 | Gold | Korea, Republic Of | Conformant |
| Heimerle + Meule GmbH | CID000694 | Gold | Germany | Conformant |
| Heraeus Metals Hong Kong Ltd. | CID000707 | Gold | China | Conformant |
| Heraeus Germany GmbH Co. KG | CID000711 | Gold | Germany | Conformant |
| Hunan Chenzhou Mining Co., Ltd. | CID000766 | Tungsten | China | Conformant |
| Hunan Chenzhou Mining Co., Ltd. | CID000767 | Gold | China | Outreach Required |
| Hunan Jintai New Material Co., Ltd. | CID000769 | Tungsten | China | Non Conformant |

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| Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd. | CID000773 | Gold | China | Outreach Required |
| HwaSeong CJ CO., LTD. | CID000778 | Gold | Korea, Republic Of | Communication Suspended - Not Interested |
| Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | CID000801 | Gold | China | Conformant |
| Ishifuku Metal Industry Co., Ltd. | CID000807 | Gold | Japan | Conformant |
| Istanbul Gold Refinery | CID000814 | Gold | Turkey | Conformant |
| Japan Mint | CID000823 | Gold | Japan | Conformant |
| Japan New Metals Co., Ltd. | CID000825 | Tungsten | Japan | Conformant |
| Jiangxi Copper Co., Ltd. | CID000855 | Gold | China | Conformant |
| JiuJiang JinXin Nonferrous Metals Co., Ltd. | CID000914 | Tantalum | China | Conformant |
| Jiujiang Tanbre Co., Ltd. | CID000917 | Tantalum | China | Conformant |
| Asahi Refining USA Inc. | CID000920 | Gold | United States Of America | Conformant |
| Asahi Refining Canada Ltd. | CID000924 | Gold | Canada | Conformant |
| JSC Ekaterinburg Non-Ferrous Metal Processing Plant | CID000927 | Gold | Russian Federation | RMI Due Diligence Review - Unable to Proceed |
| JSC Uralelectromed | CID000929 | Gold | Russian Federation | RMI Due Diligence Review - Unable to Proceed |
| JX Nippon Mining & Metals Co., Ltd. | CID000937 | Gold | Japan | Conformant |
| Gejiu Kai Meng Industry and Trade LLC | CID000942 | Tin | China | Non Conformant |
| Kazakhmys Smelting LLC | CID000956 | Gold | Kazakhstan | Outreach Required |
| Kazzinc | CID000957 | Gold | Kazakhstan | Conformant |
| Kennametal Fallon | CID000966 | Tungsten | United States Of America | Conformant |
| Kennecott Utah Copper LLC | CID000969 | Gold | United States Of America | Conformant |
| Kojima Chemicals Co., Ltd. | CID000981 | Gold | Japan | Conformant |
| Kyrgyzaltyn JSC | CID001029 | Gold | Kyrgyzstan | Non Conformant |
| L'azurde Company For Jewelry | CID001032 | Gold | Saudi Arabia | RMI Due Diligence Review - Unable to Proceed |
| Lingbao Gold Co., Ltd. | CID001056 | Gold | China | Outreach Required |
| Lingbao Jinyuan Tonghui Refinery Co., Ltd. | CID001058 | Gold | China | Outreach Required |
| China Tin Group Co., Ltd. | CID001070 | Tin | China | Conformant |
| AMG Brasil | CID001076 | Tantalum | Brazil | Conformant |
| LS-NIKKO Copper Inc. | CID001078 | Gold | Korea, Republic Of | Conformant |
| Luoyang Zijin Yinhui Gold Refinery Co., Ltd. | CID001093 | Gold | China | Outreach Required |

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| Malaysia Smelting Corporation (MSC) | CID001105 | Tin | Malaysia | Conformant |
| Materion | CID001113 | Gold | United States Of America | Conformant |
| Matsuda Sangyo Co., Ltd. | CID001119 | Gold | Japan | Conformant |
| Metallic Resources, Inc. | CID001142 | Tin | United States Of America | Conformant |
| Metalor Technologies (Suzhou) Ltd. | CID001147 | Gold | China | Conformant |
| Metalor Technologies (Hong Kong) Ltd. | CID001149 | Gold | China | Conformant |
| Metalor Technologies (Singapore) Pte., Ltd. | CID001152 | Gold | Singapore | Conformant |
| Metalor Technologies S.A. | CID001153 | Gold | Switzerland | Conformant |
| Metalor USA Refining Corporation | CID001157 | Gold | United States Of America | Conformant |
| Metalurgica Met-Mex Penoles S.A. De C.V. | CID001161 | Gold | Mexico | Conformant |
| Metallurgical Products India Pvt., Ltd. | CID001163 | Tantalum | India | Conformant |
| Mineracao Taboca S.A. | CID001173 | Tin | Brazil | Conformant |
| Mineracao Taboca S.A. | CID001175 | Tantalum | Brazil | Conformant |
| Minsur | CID001182 | Tin | Peru | Conformant |
| Mitsubishi Materials Corporation | CID001188 | Gold | Japan | Conformant |
| Mitsubishi Materials Corporation | CID001191 | Tin | Japan | Conformant |
| Mitsui Mining and Smelting Co., Ltd. | CID001192 | Tantalum | Japan | Conformant |
| Mitsui Mining and Smelting Co., Ltd. | CID001193 | Gold | Japan | Conformant |
| NPM Silmet AS | CID001200 | Tantalum | Estonia | Conformant |
| Moscow Special Alloys Processing Plant | CID001204 | Gold | Russian Federation | RMI Due Diligence Review - Unable to Proceed |
| Nadir Metal Rafineri San. Ve Tic. A.S. | CID001220 | Gold | Turkey | Conformant |
| Jiangxi New Nanshan Technology Ltd. | CID001231 | Tin | China | Conformant |
| Navoi Mining and Metallurgical Combinat | CID001236 | Gold | Uzbekistan | Conformant |
| Nihon Material Co., Ltd. | CID001259 | Gold | Japan | Conformant |
| Ningxia Orient Tantalum Industry Co., Ltd. | CID001277 | Tantalum | China | Conformant |
| Novosibirsk Tin Combine | CID001305 | Tin | Russian Federation | RMI Due Diligence Review - Unable to Proceed |
| O.M. Manufacturing (Thailand) Co., Ltd. | CID001314 | Tin | Thailand | Conformant |
| Ohura Precious Metal Industry Co., Ltd. | CID001325 | Gold | Japan | Conformant |

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| OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | CID001326 | Gold | Russian Federation | RMI Due Diligence Review - Unable to Proceed |
| Operaciones Metalurgicas S.A. | CID001337 | Tin | Bolivia (Plurinational State Of) | Conformant |
| MKS PAMP SA | CID001352 | Gold | Switzerland | Conformant |
| Penglai Penggang Gold Industry Co., Ltd. | CID001362 | Gold | China | Outreach Required |
| Prioksky Plant of Non-Ferrous Metals | CID001386 | Gold | Russian Federation | RMI Due Diligence Review - Unable to Proceed |
| PT Aneka Tambang (Persero) Tbk | CID001397 | Gold | Indonesia | Conformant |
| PT Artha Cipta Langgeng | CID001399 | Tin | Indonesia | Conformant |
| PT Babel Inti Perkasa | CID001402 | Tin | Indonesia | Conformant |
| PT Babel Surya Alam Lestari | CID001406 | Tin | Indonesia | Conformant |
| PT Bangka Tin Industry | CID001419 | Tin | Indonesia | Active |
| PT Belitung Industri Sejahtera | CID001421 | Tin | Indonesia | Conformant |
| PT Bukit Timah | CID001428 | Tin | Indonesia | Conformant |
| PT Mitra Stania Prima | CID001453 | Tin | Indonesia | Conformant |
| PT Panca Mega Persada | CID001457 | Tin | Indonesia | Outreach Required |
| PT Prima Timah Utama | CID001458 | Tin | Indonesia | Conformant |
| PT Refined Bangka Tin | CID001460 | Tin | Indonesia | Conformant |
| PT Sariwiguna Binasentosa | CID001463 | Tin | Indonesia | Conformant |
| PT Stanindo Inti Perkasa | CID001468 | Tin | Indonesia | Conformant |
| PT Timah Tbk Kundur | CID001477 | Tin | Indonesia | Conformant |
| PT Timah Tbk Mentok | CID001482 | Tin | Indonesia | Conformant |
| PT Timah Nusantara | CID001486 | Tin | Indonesia | Conformant |
| PT Tinindo Inter Nusa | CID001490 | Tin | Indonesia | Conformant |
| PT Tommy Utama | CID001493 | Tin | Indonesia | Conformant |
| PX Precinox S.A. | CID001498 | Gold | Switzerland | Conformant |
| QuantumClean | CID001508 | Tantalum | United States Of America | Conformant |
| Rand Refinery (Pty) Ltd. | CID001512 | Gold | South Africa | Conformant |
| Yanling Jincheng Tantalum & Niobium Co., Ltd. | CID001522 | Tantalum | China | Conformant |
| Royal Canadian Mint | CID001534 | Gold | Canada | Conformant |
| Rui Da Hung | CID001539 | Tin | Taiwan, Province Of China | Conformant |
| Sabin Metal Corp. | CID001546 | Gold | United States Of America | Communication Suspended - Not Interested |
| Samduck Precious Metals | CID001555 | Gold | Korea, Republic Of | Non Conformant |

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| Samwon Metals Corp. | CID001562 | Gold | Korea, Republic Of | Communication Suspended - Not Interested |
| SEMPSA Joyeria Plateria S.A. | CID001585 | Gold | Spain | Conformant |
| Shandong Tiancheng Biological Gold Industrial Co., Ltd. | CID001619 | Gold | China | Outreach Required |
| Shandong Zhaojin Gold & Silver Refinery Co., Ltd. | CID001622 | Gold | China | Conformant |
| Sichuan Tianze Precious Metals Co., Ltd. | CID001736 | Gold | China | Conformant |
| SOE Shyolkovsky Factory of Secondary Precious Metals | CID001756 | Gold | Russian Federation | RMI Due Diligence Review - Unable to Proceed |
| Solar Applied Materials Technology Corp. | CID001761 | Gold | Taiwan, Province Of China | Conformant |
| Solikamsk Magnesium Works OAO | CID001769 | Tantalum | Russian Federation | RMI Due Diligence Review - Unable to Proceed |
| Sumitomo Metal Mining Co., Ltd. | CID001798 | Gold | Japan | Conformant |
| Super Dragon Technology Co., Ltd. | CID001810 | Gold | Taiwan, Province Of China | Outreach Required |
| Taki Chemical Co., Ltd. | CID001869 | Tantalum | Japan | Conformant |
| Tanaka Kikinzoku Kogyo K.K. | CID001875 | Gold | Japan | Conformant |
| Telex Metals | CID001891 | Tantalum | United States Of America | Conformant |
| Thaisarco | CID001898 | Tin | Thailand | Conformant |
| Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | CID001908 | Tin | China | Non Conformant |
| Great Wall Precious Metals Co., Ltd. of CBPM | CID001909 | Gold | China | Outreach Required |
| Shandong Gold Smelting Co., Ltd. | CID001916 | Gold | China | Conformant |
| Tokuriki Honten Co., Ltd. | CID001938 | Gold | Japan | Conformant |
| Tongling Nonferrous Metals Group Co., Ltd. | CID001947 | Gold | China | Outreach Required |
| Torecom | CID001955 | Gold | Korea, Republic Of | Conformant |
| Ulba Metallurgical Plant JSC | CID001969 | Tantalum | Kazakhstan | Conformant |
| Umicore S.A. Business Unit Precious Metals Refining | CID001980 | Gold | Belgium | Conformant |
| United Precious Metal Refining, Inc. | CID001993 | Gold | United States Of America | Conformant |
| Valcambi S.A. | CID002003 | Gold | Switzerland | Conformant |
| VQB Mineral and Trading Group JSC | CID002015 | Tin | Viet Nam | Outreach Required |
| Western Australian Mint (T/a The Perth Mint) | CID002030 | Gold | Australia | Conformant |
| White Solder Metalurgia e Mineracao Ltda. | CID002036 | Tin | Brazil | Conformant |
| Wolfram Bergbau und Hutten AG | CID002044 | Tungsten | Austria | Conformant |

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| Xiamen Tungsten Co., Ltd. | CID002082 | Tungsten | China | Conformant |
| Yamakin Co., Ltd. | CID002100 | Gold | Japan | Conformant |
| Yokohama Metal Co., Ltd. | CID002129 | Gold | Japan | Conformant |
| Yunnan Chengfeng Non-ferrous Metals Co., Ltd. | CID002158 | Tin | China | Conformant |
| Tin Smelting Branch of Yunnan Tin Co., Ltd. | CID002180 | Tin | China | Conformant |
| Zhongyuan Gold Smelter of Zhongjin Gold Corporation | CID002224 | Gold | China | Conformant |
| Gold Refinery of Zijin Mining Group Co., Ltd. | CID002243 | Gold | China | Conformant |
| Morris and Watson | CID002282 | Gold | New Zealand | Outreach Required |
| SAFINA A.S. | CID002290 | Gold | Czechia | Conformant |
| Guangdong Jinding Gold Limited | CID002312 | Gold | China | Outreach Required |
| Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. | CID002313 | Tungsten | China | Communication Suspended - Not Interested |
| Umicore Precious Metals Thailand | CID002314 | Gold | Thailand | Non Conformant |
| Ganzhou Jiangwu Ferrotungsten Co., Ltd. | CID002315 | Tungsten | China | Conformant |
| Jiangxi Yaosheng Tungsten Co., Ltd. | CID002316 | Tungsten | China | Conformant |
| Jiangxi Xinsheng Tungsten Industry Co., Ltd. | CID002317 | Tungsten | China | Conformant |
| Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | CID002318 | Tungsten | China | Conformant |
| Malipo Haiyu Tungsten Co., Ltd. | CID002319 | Tungsten | China | Conformant |
| Xiamen Tungsten (H.C.) Co., Ltd. | CID002320 | Tungsten | China | Conformant |
| Jiangxi Gan Bei Tungsten Co., Ltd. | CID002321 | Tungsten | China | Conformant |
| CV Venus Inti Perkasa | CID002455 | Tin | Indonesia | Conformant |
| Magnu's Minerais Metais e Ligas Ltda. | CID002468 | Tin | Brazil | Conformant |
| PT Tirus Putra Mandiri | CID002478 | Tin | Indonesia | Communication Suspended - Not Interested |
| Hengyang King Xing Lifeng New Materials Co., Ltd. | CID002492 | Tantalum | China | Conformant |
| Ganzhou Seadragon W & Mo Co., Ltd. | CID002494 | Tungsten | China | Conformant |
| Melt Metais e Ligas S.A. | CID002500 | Tin | Brazil | Non Conformant |
| Asia Tungsten Products Vietnam Ltd. | CID002502 | Tungsten | Viet Nam | Conformant |
| PT ATD Makmur Mandiri Jaya | CID002503 | Tin | Indonesia | Conformant |
| D Block Metals, LLC | CID002504 | Tantalum | United States Of America | Conformant |
| FIR Metals & Resource Ltd. | CID002505 | Tantalum | China | Conformant |

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| Jiujiang Zhongao Tantalum & Niobium Co., Ltd. | CID002506 | Tantalum | China | Conformant |
| XinXing HaoRong Electronic Material Co., Ltd. | CID002508 | Tantalum | China | Conformant |
| MMTC-PAMP India Pvt., Ltd. | CID002509 | Gold | India | Conformant |
| KGHM Polska Miedz Spolka Akcyjna | CID002511 | Gold | Poland | Conformant |
| Jiangxi Dinghai Tantalum & Niobium Co., Ltd. | CID002512 | Tantalum | China | Conformant |
| Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch | CID002513 | Tungsten | China | Conformant |
| Fidelity Printers and Refiners Ltd. | CID002515 | Gold | Zimbabwe | RMI Due Diligence Review - Unable to Proceed |
| Singway Technology Co., Ltd. | CID002516 | Gold | Taiwan, Province Of China | Non Conformant |
| O.M. Manufacturing Philippines, Inc. | CID002517 | Tin | Philippines | Conformant |
| Shandong Humon Smelting Co., Ltd. | CID002525 | Gold | China | Outreach Required |
| Shenzhen Zhonghenglong Real Industry Co., Ltd. | CID002527 | Gold | China | Outreach Required |
| KEMET de Mexico | CID002539 | Tantalum | Mexico | Conformant |
| H.C. Starck Tungsten GmbH | CID002541 | Tungsten | Germany | Conformant |
| TANIOBIS Smelting GmbH & Co. KG | CID002542 | Tungsten | Germany | Conformant |
| Masan High-Tech Materials | CID002543 | Tungsten | Viet Nam | Conformant |
| TANIOBIS Co., Ltd. | CID002544 | Tantalum | Thailand | Conformant |
| TANIOBIS GmbH | CID002545 | Tantalum | Germany | Conformant |
| Materion Newton Inc. | CID002548 | Tantalum | United States Of America | Conformant |
| TANIOBIS Japan Co., Ltd. | CID002549 | Tantalum | Japan | Conformant |
| TANIOBIS Smelting GmbH & Co. KG | CID002550 | Tantalum | Germany | Conformant |
| Jiangwu H.C. Starck Tungsten Products Co., Ltd. | CID002551 | Tungsten | China | Conformant |
| Global Advanced Metals Boyertown | CID002557 | Tantalum | United States Of America | Conformant |
| Global Advanced Metals Aizu | CID002558 | Tantalum | Japan | Conformant |
| Al Etihad Gold Refinery DMCC | CID002560 | Gold | United Arab Emirates | Non Conformant |
| Emirates Gold DMCC | CID002561 | Gold | United Arab Emirates | Non Conformant |
| International Precious Metal Refiners | CID002562 | Gold | United Arab Emirates | Outreach Required |
| Kaloti Precious Metals | CID002563 | Gold | United Arab Emirates | RMI Due Diligence Review - Unable to Proceed |
| Sudan Gold Refinery | CID002567 | Gold | Sudan | Outreach Required |
| CV Ayi Jaya | CID002570 | Tin | Indonesia | Conformant |

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| Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | CID002572 | Tin | Viet Nam | Non Conformant |
| Nghe Tinh Non-Ferrous Metals Joint Stock Company | CID002573 | Tin | Viet Nam | Outreach Required |
| Tuyen Quang Non-Ferrous Metals Joint Stock Company | CID002574 | Tin | Viet Nam | Outreach Required |
| T.C.A S.p.A | CID002580 | Gold | Italy | Conformant |
| REMONDIS PMR B.V. | CID002582 | Gold | Netherlands | Conformant |
| Fujairah Gold FZC | CID002584 | Gold | United Arab Emirates | Outreach Required |
| Industrial Refining Company | CID002587 | Gold | Belgium | Non Conformant |
| Shirpur Gold Refinery Ltd. | CID002588 | Gold | India | Outreach Required |
| Niagara Refining LLC | CID002589 | Tungsten | United States Of America | Conformant |
| PT Rajehan Ariq | CID002593 | Tin | Indonesia | Conformant |
| Korea Zinc Co., Ltd. | CID002605 | Gold | Korea, Republic Of | Conformant |
| Marsam Metals | CID002606 | Gold | Brazil | Non Conformant |
| TOO Tau-Ken-Altyn | CID002615 | Gold | Kazakhstan | Conformant |
| China Molybdenum Tungsten Co., Ltd. | CID002641 | Tungsten | China | Conformant |
| Hydrometallurg, JSC | CID002649 | Tungsten | Russian Federation | RMI Due Diligence Review - Unable to Proceed |
| PT Cipta Persada Mulia | CID002696 | Tin | Indonesia | Conformant |
| An Vinh Joint Stock Mineral Processing Company | CID002703 | Tin | Viet Nam | Outreach Required |
| Resind Industria e Comercio Ltda. | CID002706 | Tin | Brazil | Conformant |
| Resind Industria e Comercio Ltda. | CID002707 | Tantalum | Brazil | Conformant |
| Abington Reldan Metals, LLC | CID002708 | Gold | United States Of America | Conformant |
| Unecha Refractory metals plant | CID002724 | Tungsten | Russian Federation | Non Conformant |
| Shenzhen CuiLu Gold Co., Ltd. | CID002750 | Gold | China | Outreach Required |
| Super Ligas | CID002756 | Tin | Brazil | Conformant |
| Albino Mountinho Lda. | CID002760 | Gold | Portugal | Outreach Required |
| SAAMP | CID002761 | Gold | France | Non Conformant |
| L'Orfebre S.A. | CID002762 | Gold | Andorra | Conformant |
| 8853 S.p.A. | CID002763 | Gold | Italy | Non Conformant |
| Italpreziosi | CID002765 | Gold | Italy | Conformant |
| Aurubis Beerse | CID002773 | Tin | Belgium | Conformant |
| Aurubis Berango | CID002774 | Tin | Spain | Conformant |
| PT Bangka Prima Tin | CID002776 | Tin | Indonesia | Conformant |
| WIELAND Edelmetalle GmbH | CID002778 | Gold | Germany | Conformant |

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| Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH | CID002779 | Gold | Austria | Conformant |
| PT Sukses Inti Makmur | CID002816 | Tin | Indonesia | Conformant |
| Philippine Chuangxin Industrial Co., Inc. | CID002827 | Tungsten | Philippines | Conformant |
| ACL Metais Eireli | CID002833 | Tungsten | Brazil | Non Conformant |
| PT Menara Cipta Mulia | CID002835 | Tin | Indonesia | Conformant |
| Jiangxi Tuohong New Raw Material | CID002842 | Tantalum | China | Conformant |
| HuiChang Hill Tin Industry Co., Ltd. | CID002844 | Tin | China | Conformant |
| Moliren Ltd. | CID002845 | Tungsten | Russian Federation | RMI Due Diligence Review - Unable to Proceed |
| AU Traders and Refiners | CID002850 | Gold | South Africa | Non Conformant |
| GGC Gujrat Gold Centre Pvt. Ltd. | CID002852 | Gold | India | Non Conformant |
| Sai Refinery | CID002853 | Gold | India | Outreach Required |
| Modeltech Sdn Bhd | CID002857 | Gold | Malaysia | Non Conformant |
| Modeltech Sdn Bhd | CID002858 | Tin | Malaysia | Non Conformant |
| Bangalore Refinery | CID002863 | Gold | India | Active |
| Kyshtym Copper-Electrolytic Plant ZAO | CID002865 | Gold | Russian Federation | RMI Due Diligence Review - Unable to Proceed |
| Degussa Sonne / Mond Goldhandel GmbH | CID002867 | Gold | Germany | Outreach Required |
| Pease & Curren | CID002872 | Gold | United States Of America | Communication Suspended - Not Interested |
| JALAN & Company | CID002893 | Gold | India | Outreach Required |
| SungEel HiMetal Co., Ltd. | CID002918 | Gold | Korea, Republic Of | Conformant |
| Planta Recuperadora de Metales SpA | CID002919 | Gold | Chile | Conformant |
| ABC Refinery Pty Ltd. | CID002920 | Gold | Australia | Outreach Required |
| Safimet S.p.A | CID002973 | Gold | Italy | Non Conformant |
| Guangdong Hanhe Non-Ferrous Metal Co., Ltd. | CID003116 | Tin | China | Conformant |
| State Research Institute Center for Physical Sciences and Technology | CID003153 | Gold | Lithuania | Outreach Required |
| African Gold Refinery | CID003185 | Gold | Uganda | RMI Due Diligence Review - Unable to Proceed |
| Gold Coast Refinery | CID003186 | Gold | Ghana | Outreach Required |
| NH Recytech Company | CID003189 | Gold | Korea, Republic Of | Conformant |
| Chifeng Dajingzi Tin Industry Co., Ltd. | CID003190 | Tin | China | Conformant |

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| PT Bangka Serumpun | CID003205 | Tin | Indonesia | Conformant |
| Pongpipat Company Limited | CID003208 | Tin | Myanmar | Outreach Required |
| QG Refining, LLC | CID003324 | Gold | United States Of America | Outreach Required |
| Tin Technology & Refining | CID003325 | Tin | United States Of America | Conformant |
| Dijllah Gold Refinery FZC | CID003348 | Gold | United Arab Emirates | Outreach Required |
| Dongguan CiEXPO Environmental Engineering Co., Ltd. | CID003356 | Tin | China | Non Conformant |
| Ma'anshan Weitai Tin Co., Ltd. | CID003379 | Tin | China | Non Conformant |
| PT Rajawali Rimba Perkasa | CID003381 | Tin | Indonesia | Conformant |
| CGR Metalloys Pvt Ltd. | CID003382 | Gold | India | Outreach Required |
| Sovereign Metals | CID003383 | Gold | India | Outreach Required |
| Luna Smelter, Ltd. | CID003387 | Tin | Rwanda | Conformant |
| Yunnan Yunfan Non-ferrous Metals Co., Ltd. | CID003397 | Tin | China | Conformant |
| Lianyou Metals Co., Ltd. | CID003407 | Tungsten | Taiwan, Province Of China | Conformant |
| JSC "Kirovgrad Hard Alloys Plant" | CID003408 | Tungsten | Russian Federation | RMI Due Diligence Review - Unable to Proceed |
| Precious Minerals and Smelting Limited | CID003409 | Tin | India | Active |
| Gejiu City Fuxiang Industry and Trade Co., Ltd. | CID003410 | Tin | China | Outreach Required |
| NPP Tyazhmetprom LLC | CID003416 | Tungsten | Russian Federation | RMI Due Diligence Review - Unable to Proceed |
| Hubei Green Tungsten Co., Ltd. | CID003417 | Tungsten | China | Conformant |
| Eco-System Recycling Co., Ltd. North Plant | CID003424 | Gold | Japan | Conformant |
| Eco-System Recycling Co., Ltd. West Plant | CID003425 | Gold | Japan | Conformant |
| Albasteel Industria e Comercio de Ligas Para Fundicao Ltd. | CID003427 | Tungsten | Brazil | Non Conformant |
| PT Mitra Sukses Globalindo | CID003449 | Tin | Indonesia | Conformant |
| Augmont Enterprises Private Limited | CID003461 | Gold | India | Non Conformant |
| Kundan Care Products Ltd. | CID003463 | Gold | India | Outreach Required |
| Cronimet Brasil Ltda | CID003468 | Tungsten | Brazil | Conformant |
| CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda | CID003486 | Tin | Brazil | Conformant |
| Emerald Jewel Industry India Limited (Unit 1) | CID003487 | Gold | India | Outreach Required |
| Emerald Jewel Industry India Limited (Unit 2) | CID003488 | Gold | India | Outreach Required |
| Emerald Jewel Industry India Limited (Unit 3) | CID003489 | Gold | India | Outreach Required |

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| Emerald Jewel Industry India Limited (Unit 4) | CID003490 | Gold | India | Outreach Required |
| K.A. Rasmussen | CID003497 | Gold | Norway | Outreach Required |
| Alexy Metals | CID003500 | Gold | United States Of America | Non Conformant |
| CRM Synergies | CID003524 | Tin | Spain | Conformant |
| MD Overseas | CID003548 | Gold | India | Outreach Required |
| Artek LLC | CID003553 | Tungsten | Russian Federation | RMI Due Diligence Review - Unable to Proceed |
| Metallix Refining Inc. | CID003557 | Gold | United States Of America | Outreach Required |
| Metal Concentrators SA (Pty) Ltd. | CID003575 | Gold | South Africa | Conformant |
| Fabrica Auricchio Industria e Comercio Ltda. | CID003582 | Tin | Brazil | Conformant |
| RFH Yancheng Jinye New Material Technology Co., Ltd. | CID003583 | Tantalum | China | Conformant |
| Fujian Xinlu Tungsten Co., Ltd. | CID003609 | Tungsten | China | Conformant |
| OOO "Technolom" 2 | CID003612 | Tungsten | Russian Federation | RMI Due Diligence Review - Unable to Proceed |
| OOO "Technolom" 1 | CID003614 | Tungsten | Russian Federation | RMI Due Diligence Review - Unable to Proceed |
| WEEEREFINING | CID003615 | Gold | France | Conformant |
| Gold by Gold Colombia | CID003641 | Gold | Colombia | Conformant |
| LLC Vostok | CID003643 | Tungsten | Russian Federation | RMI Due Diligence Review - Unable to Proceed |
| YUDU ANSHENG TUNGSTEN CO., LTD. | CID003662 | Tungsten | China | Outreach Required |
| Dongwu Gold Group | CID003663 | Gold | China | Outreach Required |
| Sam Precious Metals | CID003666 | Gold | United Arab Emirates | Outreach Required |
| DS Myanmar | CID003831 | Tin | Myanmar | Conformant |
| PT Putera Sarana Shakti (PT PSS) | CID003868 | Tin | Indonesia | Conformant |
| 5D Production OU | CID003926 | Tantalum | Estonia | Outreach Required |
| HANNAE FOR T Co., Ltd. | CID003978 | Tungsten | Korea, Republic Of | Outreach Required |
| Tungsten Vietnam Joint Stock Company | CID003993 | Tungsten | Viet Nam | Conformant |
| Coimpa Industrial LTDA | CID004010 | Gold | Brazil | Conformant |
| Nam Viet Cromit Joint Stock Company | CID004034 | Tungsten | Viet Nam | Outreach Required |
| PowerX Ltd. | CID004054 | Tantalum | Rwanda | Conformant |
| DONGKUK INDUSTRIES CO., LTD. | CID004060 | Tungsten | Korea, Republic Of | Outreach Required |
| Mining Minerals Resources SARL | CID004065 | Tin | Congo, Democratic Republic Of The | Conformant |

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|---|-----------|----------|--|--|
| Lianyou Resources Co., Ltd. | CID004397 | Tungsten | Taiwan, Province Of China | Conformant |
| Shinwon Tungsten (Fujian Shanghang) Co., Ltd. | CID004430 | Tungsten | China | Conformant |
| Malaysia Smelting Corporation Berhad (Port Klang) | CID004434 | Tin | Malaysia | In Communication |
| GG Refinery Ltd. | CID004506 | Gold | Tanzania, United Republic Of | Active |
| Soft Metais Ltda. | CID001758 | Tin | Brazil | Conformant |
| C.I Metales Procesados Industriales SAS | CID003421 | Gold | Colombia | Non Conformant |
| Sellem Industries Ltd. | CID003540 | Gold | Mauritania | Communication Suspended - Not Interested |
| Changsha South Tantalum Niobium Co., Ltd. | CID000211 | Tantalum | China | Conformant |
| Exotech Inc. | CID000456 | Tantalum | United States Of America | Outreach Required |
| Feinhutte Halsbrucke GmbH | CID000466 | Tin | Germany | Conformant |
| Zhuzhou Cemented Carbide Group Co., Ltd. | CID002232 | Tantalum | China | Conformant |
| Plansee SE Reutte | CID002556 | Tantalum | Austria | Conformant |
| Avon Specialty Metals Ltd | CID002704 | Tungsten | United Kingdom Of Great Britain And Northern Ireland | Conformant |
| Jiujiang Janny New Material Co., Ltd. | CID003191 | Tantalum | China | Conformant |
| Ganzhou Sunny Non-Ferrous Metals Co., Ltd. | CID003580 | Tungsten | China | Conformant |
| Kenee Mining Corporation Vietnam | CID004619 | Tungsten | Viet Nam | Active |
| Sanher Tungsten Vietnam Co., Ltd. | CID002538 | Tungsten | Viet Nam | Non Conformant |
| RFH Recycling Metals Co., Ltd. | CID003159 | Tantalum | China | Conformant |
| TRATHO Metal Quimica | CID003474 | Tin | Brazil | Conformant |
| V&D New Materials (Jiangsu) Co., Ltd. | CID003498 | Tantalum | China | Conformant |
| Rian Resources SDN. BHD. | CID003581 | Tin | Malaysia | Conformant |
| XIMEI RESOURCES(GUIZHOU) TECHNOLOGY CO., LTD. | CID003973 | Tantalum | China | Conformant |
| Takehara PVD Materials Plant / PVD Materials Division of MITSUI MINING & SMELTING CO., LTD. | CID004403 | Tin | Japan | Active |
| KP Sanghvi International Airport | CID004433 | Gold | India | Active |

Countries of Origin

| Gold mines' country of origin |
|-------------------------------|
| Andorra |
| Australia |
| Austria |
| Belgium |
| Brazil |
| Canada |
| Chile |
| China |
| Colombia |
| Czechia |
| France |
| Germany |
| Ghana |
| India |
| Indonesia |
| Italy |
| Japan |
| Kazakhstan |
| Korea, Republic Of |
| Kyrgyzstan |
| Lithuania |
| Malaysia |
| Mauritania |
| Mexico |
| Netherlands |
| New Zealand |
| Norway |
| Philippines |
| Poland |
| Portugal |
| Russian Federation |

| |
|------------------------------|
| Saudi Arabia |
| Singapore |
| South Africa |
| Spain |
| Sudan |
| Sweden |
| Switzerland |
| Taiwan, Province Of China |
| Tanzania, United Republic Of |
| Thailand |
| Turkey |
| Uganda |
| United Arab Emirates |
| United States Of America |
| Uzbekistan |
| Zambia |
| Zimbabwe |
| (blank) |

| Tantalum mines' country of origin |
|--|
| Austria |
| Brazil |
| China |
| Estonia |
| Germany |
| India |
| Japan |
| Kazakhstan |
| Mexico |
| North Macedonia |
| Russian Federation |
| Rwanda |
| Thailand |
| United Kingdom Of Great Britain And Northern Ireland |
| United States Of America |
| (blank) |

| Tin mines' country of origin |
|--|
| Belgium |
| Bolivia (Plurinational State Of) |
| Brazil |
| Canada |
| China |
| Congo, Democratic Republic Of The |
| Germany |
| India |
| Indonesia |
| Italy |
| Japan |
| Korea, Republic Of |
| Malaysia |
| Myanmar |
| Peru |
| Philippines |
| Poland |
| Russian Federation |
| Rwanda |
| Singapore |
| Spain |
| Taiwan, Province Of China |
| Thailand |
| United Kingdom Of Great Britain And Northern Ireland |
| United States Of America |
| Viet Nam |
| (blank) |

| Tungsten mines' country of origin |
|--|
| Austria |
| Brazil |
| China |
| Germany |
| India |
| Japan |
| Korea, Republic Of |
| Philippines |
| Russian Federation |
| Taiwan, Province Of China |
| United Kingdom Of Great Britain And Northern Ireland |
| United States Of America |
| Viet Nam |
| Grand Total |