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SMART Technologies ULC 2022 Conflict Minerals Report

Introduction

Conflict minerals are defined as cassiterite, columbite-tantalite (coltan), gold, wolframite, and their derivatives, which are limited to gold, tin, tantalum and tungsten (the 3TGs). Historically, the trading of these minerals has been connected to financing and benefitting armed groups in the Democratic Republic of the Congo (DRC) and the nine adjoining countries, known as the Covered Countries. SMART Technologies ULC (SMART) is committed to ensuring the responsible sourcing of conflict minerals used in its products and conducts an annual survey of suppliers to determine if any 3TG material may have originated in the Covered Countries. SMART conducts due diligence at the smelter level for all sources of conflict minerals which may have originated in the Covered Countries.

This report outlines the policies and procedures used to conduct supply chain due diligence on the conflict minerals in SMART's products for the year ended December 31, 2022. This process was developed according to the OECD Due Diligence Guidance for Responsible Supply Chain of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance).

Step One: Establish Strong Company Management Systems

- *Step 1A - Adopt, and clearly communicate to suppliers and the public, a company policy for the supply chain of minerals originating from conflict-affected and high-risk areas.*
 - We adopted a Conflict Minerals Policy that is publicly available at <https://www.smarttech.com/en/about/environmental-commitment>. SMART's position on conflict minerals is communicated to suppliers annually in our conflict minerals survey request.
- *Step 1B - Structure internal management to support supply chain due diligence.*
 - SMART's Conflict Minerals Team is made up of members from the Environmental Compliance and Procurement departments. Additionally, SMART has retained a third-party service provider to assist with smelter due diligence and risk identification.
- *Step 1C - Establish a system of transparency, information collection and control over the supply chain.*
 - SMART has developed a comprehensive internal process for its Conflict Minerals Program. SMART conducted a Reasonable Country of Origin Inquiry (RCOI) on the source of conflict minerals used in SMART's products, including a due diligence and risk identification process. Full details on supply chain data gathering are included in "Step Two" of this Report. SMART has a system in place to retain conflict minerals records for five years.
- *Step 1D - Strengthen company engagement with suppliers. We engage directly with suppliers during the RCOI process.*



- Our Supplier Code of Conduct requires suppliers to track and report on the use of conflict minerals in their products by providing SMART with a complete Conflict Minerals Reporting Template (CMRT) upon request. SMART has implemented a plan to improve the quantity and quality of supplier responses year-over-year by providing training to suppliers who provide incomplete or inaccurate smelter data.
- *Step 1E - Establish a company level grievance mechanism.*
 - SMART has an internal Whistleblower Policy that allows employees to voice concerns about suspected violations of our Conflict Minerals Policy without fear of retribution.

Step Two: Identify and Assess Risk in the Supply Chain

We designed our RCOI process in accordance with Step 2A and 2B of the OECD Guidance. Our RCOI process involved two stages:

- Stage 1 - Supplier RCOI (Step 2A of the OECD Guidance)
- Stage 2 - Smelter RCOI (Step 2B of the OECD Guidance)

Supplier RCOI

We designed our supplier RCOI process to identify the smelters in our supply chain. Our supplier RCOI process for the 2022 reporting period included:

- Developing a list of suppliers providing 3TG containing components
- Contacting each supplier and requesting conflict minerals data using the industry-standard CMRT
- Reviewing supplier responses for accuracy and completeness
- Aggregating supplier-provided smelters into a single unique list of smelters meeting the definition of a smelter under one of three Responsible Minerals Assurance Process (RMAP) standards
- Providing training for suppliers who do not provide accurate or complete responses

Through the supplier RCOI process we identified 329 Smelters in our supply chain for the 2022 reporting period. A list of the smelters reported in SMART's supply chain can be found at the end of this report.

Smelter RCOI and Due Diligence

SMART's smelter RCOI and due diligence processes were designed to meet the criteria of Step 2 of the OECD Guidance. For the 2022 reporting period, SMART's smelter RCOI and Due Diligence processes were executed by a third-party with deep expertise in this area.

We engaged with each smelter identified in our supply chain to determine whether or not they sourced from the Covered Countries. For smelters that confirmed they did not source from the Covered Countries, but who were not recognized as conformant to the RMAP, we reviewed publicly available information to determine whether there was any contrary evidence that contradicted the smelter's declaration. In doing so, we reviewed sources such as NGO publications, including the Enough Project, Global Witness, Southern Africa Resource Watch and Radio Okapi. We also consulted the most recent United Nations Group of Experts reports on the DRC and performed public internet searches.

If smelters did not respond to our inquiry, we reviewed the same publicly available sources to determine whether there was reason to believe the smelter may have sourced from the Covered Countries during the reporting period.

We categorize smelters that are sourcing (or that we have reason to believe may be sourcing) from the Covered Countries and not currently RMAP Conformant as high-risk. In 2022, risk mitigation was conducted on smelters categorized as high-risk. Full details on risk mitigation are described in “Step Three” of this report.

Step Three: Design and Implement a Strategy to Respond to Identified Risks

Risk Mitigation

SMART conducted risk mitigation on smelters that were not recognized as conformant to the RMAP and were sourcing (or there is a reason to believe they may be sourcing) from the DRC or surrounding countries. SMART’S risk mitigation was designed in accordance with Step 3B of the OECD Guidance. SMART’s risk mitigation process included the following:

- Additional due diligence to determine if there was any reason to believe the smelter directly or indirectly finances or benefits armed groups in the Covered Countries;
- Verification with internal stakeholders and relevant suppliers of whether 3TGs from the specific smelter were actually in SMART’s supply chain during the reporting period; and
- If necessary and where possible, direct engagement with smelters that are not conformant to encourage them to join the RMAP.
- Development of a process to follow-up with supplier’s reporting high-risk smelters to request removal of these facilities from the supply chain.
- Results were reported to the Senior Management Representative Scott Willcocks, VP Operations.

For the 2022 reporting period, SMART focused escalations on suppliers who reported high-risk smelters that are known bad actors and have been flagged consistently over the years.

Improvement Plan

SMART is taking and will continue to take the following steps to improve the due diligence conducted to further mitigate risk that the necessary conflict minerals in SMART’s products could directly or indirectly benefit or finance armed groups in the Covered Countries:

- Including a conflict minerals clause in all new and renewing supplier agreements and confirming the supplier’s ability to participate in SMART’s annual conflict minerals program as part of onboarding.
- Continuing to drive our suppliers to obtain current, accurate, and complete information about the smelters in their supply chain and providing training to suppliers where necessary.
- Engaging smelters sourcing from the Covered Countries to be audited and conformant to a protocol recognized by the RMAP.
- Follow up in 2023 on smelters requiring risk mitigation.

Step Four: Carry Out Independent Third-Part Audit of Supply Chain Due Diligence at Identified Points in the Supply Chain

SMART relies on the public RMAP Active and Conformant lists published by the Responsible Minerals Initiative (RMI) as part of the risk assessment for smelters reported in SMART's supply chain. Smelters on the RMAP Conformant lists have been audited by a third party against one of three RMAP Standards and assures the smelter's management systems are aligned with the OECD Guidance. SMART has a method for monitoring the RMAP Conformant smelter lists and updating due diligence information on an annual basis through its third-party service provider.

SMART has confidence in the RMAP process as it is rigorously governed. Details are on the RMI site at <https://www.responsiblemineralsinitiative.org/about/governance/>.

Step Five: Report on Supply Chain Due Diligence

SMART has no legal requirement to report annually on its Conflict Minerals Program. In keeping with the company's dedication to compliance and corporate social responsibility, SMART has voluntarily published this Conflict Minerals Report to the company website. SMART will update the report on an annual basis to reflect our most recent conflict minerals campaign.

Smelters and Refiners

Metal	Standard Smelter Name	Smelter ID	Country of Operation
Gold	8853 S.p.A.	CID002763	ITALY
Gold	ABC Refinery Pty Ltd.	CID002920	AUSTRALIA
Gold	Abington Reldan Metals, LLC	CID002708	UNITED STATES OF AMERICA
Gold	Advanced Chemical Company	CID000015	UNITED STATES OF AMERICA
Gold	Agosi AG	CID000035	GERMANY
Gold	Aida Chemical Industries Co., Ltd.	CID000019	JAPAN
Gold	Al Etihad Gold Refinery DMCC	CID002560	UNITED ARAB EMIRATES
Gold	Alexy Metals	CID003500	UNITED STATES OF AMERICA
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	CID000041	UZBEKISTAN
Gold	AngloGold Ashanti Córrego do Sítio Mineração	CID000058	BRAZIL
Gold	Argor-Heraeus S.A.	CID000077	SWITZERLAND
Gold	Asahi Pretec Corp.	CID000082	JAPAN
Gold	Asahi Refining Canada Ltd.	CID000924	CANADA
Gold	Asahi Refining USA Inc.	CID000920	UNITED STATES OF AMERICA
Gold	Asaka Riken Co., Ltd.	CID000090	JAPAN
Gold	Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	CID000103	TURKEY
Gold	AU Traders and Refiners	CID002850	SOUTH AFRICA
Gold	Augmont Enterprises Private Limited	CID003461	INDIA

Gold	Aurubis AG	CID000113	GERMANY
Gold	Bangalore Refinery	CID002863	INDIA
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	CID000128	PHILIPPINES
Gold	Boliden AB	CID000157	SWEDEN
Gold	C. Hafner GmbH + Co. KG	CID000176	GERMANY
Gold	C.I Metales Procesados Industriales SAS	CID003421	COLOMBIA
Gold	Caridad	CID000180	MEXICO
Gold	CCR Refinery - Glencore Canada Corporation	CID000185	CANADA
Gold	Cendres + Métaux S.A.	CID000189	SWITZERLAND
Gold	CGR Metalloys Pvt Ltd.	CID003382	INDIA
Gold	Chimet S.p.A.	CID000233	ITALY
Gold	Chugai Mining	CID000264	JAPAN
Gold	Daye Non-Ferrous Metals Mining Ltd.	CID000343	CHINA
Gold	Degussa Sonne / Mond Goldhandel GmbH	CID002867	GERMANY
Gold	Dongwu Gold Group	CID003663	CHINA
Gold	Dowa	CID000401	JAPAN
Gold	DSC (Do Sung Corporation)	CID000359	KOREA, REPUBLIC OF
Gold	Eco-System Recycling Co., Ltd. East Plant	CID000425	JAPAN
Gold	Eco-System Recycling Co., Ltd. North Plant	CID003424	JAPAN
Gold	Eco-System Recycling Co., Ltd. West Plant	CID003425	JAPAN
Gold	Emerald Jewel Industry India Limited (Unit 1)	CID003487	INDIA
Gold	Emerald Jewel Industry India Limited (Unit 2)	CID003488	INDIA
Gold	Emerald Jewel Industry India Limited (Unit 3)	CID003489	INDIA
Gold	Emerald Jewel Industry India Limited (Unit 4)	CID003490	INDIA
Gold	Emirates Gold DMCC	CID002561	UNITED ARAB EMIRATES
Gold	Geib Refining Corporation	CID002459	UNITED STATES OF AMERICA
Gold	GGC Gujrat Gold Centre Pvt. Ltd.	CID002852	INDIA
Gold	Gold by Gold Colombia	CID003641	COLOMBIA
Gold	Gold Coast Refinery	CID003186	GHANA
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CID002243	CHINA
Gold	Great Wall Precious Metals Co., Ltd. of CBPM	CID001909	CHINA
Gold	Guangdong Jinding Gold Limited	CID002312	CHINA
Gold	Guoda Safina High-Tech Environmental Refinery Co., Ltd.	CID000651	CHINA
Gold	Hangzhou Fuchunjiang Smelting Co., Ltd.	CID000671	CHINA
Gold	Heimerle + Meule GmbH	CID000694	GERMANY
Gold	Henan Yuguang Gold & Lead Co., Ltd.	CID002519	CHINA

Gold	Heraeus Germany GmbH Co. KG	CID000711	GERMANY
Gold	Heraeus Metals Hong Kong Ltd.	CID000707	CHINA
Gold	Hunan Chenzhou Mining Co., Ltd.	CID000767	CHINA
Gold	Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd.	CID000773	CHINA
Gold	HwaSeong CJ Co., Ltd.	CID000778	KOREA, REPUBLIC OF
Gold	Industrial Refining Company	CID002587	BELGIUM
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CID000801	CHINA
Gold	Ishifuku Metal Industry Co., Ltd.	CID000807	JAPAN
Gold	Istanbul Gold Refinery	CID000814	TURKEY
Gold	Italpreziosi	CID002765	ITALY
Gold	JALAN & Company	CID002893	INDIA
Gold	Japan Mint	CID000823	JAPAN
Gold	Jiangxi Copper Co., Ltd.	CID000855	CHINA
Gold	JSC Ekaterinburg Non-Ferrous Metal Processing Plant	CID000927	RUSSIAN FEDERATION
Gold	JSC Novosibirsk Refinery	CID000493	RUSSIAN FEDERATION
Gold	JSC Uralelectromed	CID000929	RUSSIAN FEDERATION
Gold	JX Nippon Mining & Metals Co., Ltd.	CID000937	JAPAN
Gold	K.A. Rasmussen	CID003497	NORWAY
Gold	Kazakhmys Smelting LLC	CID000956	KAZAKHSTAN
Gold	Kazzinc	CID000957	KAZAKHSTAN
Gold	Kennecott Utah Copper LLC	CID000969	UNITED STATES OF AMERICA
Gold	KGHM Polska Miedź Spółka Akcyjna	CID002511	POLAND
Gold	Kojima Chemicals Co., Ltd.	CID000981	JAPAN
Gold	Korea Zinc Co., Ltd.	CID002605	KOREA, REPUBLIC OF
Gold	Kundan Care Products Ltd.	CID003463	INDIA
Gold	Kyrgyzaltyn JSC	CID001029	KYRGYZSTAN
Gold	L'azurde Company For Jewelry	CID001032	SAUDI ARABIA
Gold	L'Orfebres S.A.	CID002762	ANDORRA
Gold	Lingbao Gold Co., Ltd.	CID001056	CHINA
Gold	Lingbao Jinyuan Tonghui Refinery Co., Ltd.	CID001058	CHINA
Gold	LS-NIKKO Copper Inc.	CID001078	KOREA, REPUBLIC OF
Gold	LT Metal Ltd.	CID000689	KOREA, REPUBLIC OF
Gold	Luoyang Zijin Yinhuai Gold Refinery Co., Ltd.	CID001093	CHINA
Gold	Marsam Metals	CID002606	BRAZIL

Gold	Materion	CID001113	UNITED STATES OF AMERICA
Gold	Matsuda Sangyo Co., Ltd.	CID001119	JAPAN
Gold	MD Overseas	CID003548	INDIA
Gold	Metal Concentrators SA (Pty) Ltd.	CID003575	SOUTH AFRICA
Gold	Metallix Refining Inc.	CID003557	UNITED STATES OF AMERICA
Gold	Metalor Technologies (Hong Kong) Ltd.	CID001149	CHINA
Gold	Metalor Technologies (Singapore) Pte., Ltd.	CID001152	SINGAPORE
Gold	Metalor Technologies (Suzhou) Ltd.	CID001147	CHINA
Gold	Metalor Technologies S.A.	CID001153	SWITZERLAND
Gold	Metalor USA Refining Corporation	CID001157	UNITED STATES OF AMERICA
Gold	Metalúrgica Met-Mex Peñoles S.A. De C.V.	CID001161	MEXICO
Gold	Mitsubishi Materials Corporation	CID001188	JAPAN
Gold	Mitsui Mining and Smelting Co., Ltd.	CID001193	JAPAN
Gold	MKS PAMP SA	CID001352	SWITZERLAND
Gold	MMTC-PAMP India Pvt., Ltd.	CID002509	INDIA
Gold	Modeltech Sdn Bhd	CID002857	MALAYSIA
Gold	Morris and Watson	CID002282	NEW ZEALAND
Gold	Moscow Special Alloys Processing Plant	CID001204	RUSSIAN FEDERATION
Gold	Nadir Metal Rafineri San. Ve Tic. A.Ş.	CID001220	TURKEY
Gold	Navoi Mining and Metallurgical Combinat	CID001236	UZBEKISTAN
Gold	NH Recytech Company	CID003189	KOREA, REPUBLIC OF
Gold	Nihon Material Co., Ltd.	CID001259	JAPAN
Gold	Ögussa Österreichische Gold- und Silber-Scheideanstalt GmbH	CID002779	AUSTRIA
Gold	Ohura Precious Metal Industry Co., Ltd.	CID001325	JAPAN
Gold	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	CID001326	RUSSIAN FEDERATION
Gold	Pease & Curren	CID002872	UNITED STATES OF AMERICA
Gold	Penglai Penggang Gold Industry Co., Ltd.	CID001362	CHINA
Gold	Planta Recuperadora de Metales SpA	CID002919	CHILE
Gold	Prioksky Plant of Non-Ferrous Metals	CID001386	RUSSIAN FEDERATION
Gold	PT Aneka Tambang (Persero) Tbk	CID001397	INDONESIA
Gold	PX Précinox S.A.	CID001498	SWITZERLAND
Gold	QG Refining, LLC	CID003324	UNITED STATES OF AMERICA
Gold	Rand Refinery (Pty) Ltd.	CID001512	SOUTH AFRICA
Gold	Refinery of Seemine Gold Co., Ltd.	CID000522	CHINA

Gold	REMONDIS PMR B.V.	CID002582	NETHERLANDS
Gold	Royal Canadian Mint	CID001534	CANADA
Gold	SAAMP	CID002761	FRANCE
Gold	Sabin Metal Corp.	CID001546	UNITED STATES OF AMERICA
Gold	Safimet S.p.A	CID002973	ITALY
Gold	SAFINA A.S.	CID002290	CZECHIA
Gold	Sai Refinery	CID002853	INDIA
Gold	Samduck Precious Metals	CID001555	KOREA, REPUBLIC OF
Gold	SAMWON Metals Corp.	CID001562	KOREA, REPUBLIC OF
Gold	Sancus ZFS (L'Orfebre, SA)	CID003529	COLOMBIA
Gold	Sellem Industries Ltd.	CID003540	MAURITANIA
Gold	SEMPSA Joyería Platería S.A.	CID001585	SPAIN
Gold	Shandong Gold Smelting Co., Ltd.	CID001916	CHINA
Gold	Shandong Humon Smelting Co., Ltd.	CID002525	CHINA
Gold	Shandong Tiancheng Biological Gold Industrial Co., Ltd.	CID001619	CHINA
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CID001622	CHINA
Gold	Shenzhen CuiLu Gold Co., Ltd.	CID002750	CHINA
Gold	Shenzhen Zhonghenglong Real Industry Co., Ltd.	CID002527	CHINA
Gold	Sichuan Tianze Precious Metals Co., Ltd.	CID001736	CHINA
Gold	Singway Technology Co., Ltd.	CID002516	TAIWAN, PROVINCE OF CHINA
Gold	SOE Shyolkovsky Factory of Secondary Precious Metals	CID001756	RUSSIAN FEDERATION
Gold	Solar Applied Materials Technology Corp.	CID001761	TAIWAN, PROVINCE OF CHINA
Gold	Sovereign Metals	CID003383	INDIA
Gold	State Research Institute Center for Physical Sciences and Technology	CID003153	LITHUANIA
Gold	Sumitomo Metal Mining Co., Ltd.	CID001798	JAPAN
Gold	SungEel HiMetal Co., Ltd.	CID002918	KOREA, REPUBLIC OF
Gold	Super Dragon Technology Co., Ltd.	CID001810	TAIWAN, PROVINCE OF CHINA
Gold	T.C.A S.p.A	CID002580	ITALY
Gold	Tanaka Kikinzoku Kogyo K.K.	CID001875	JAPAN
Gold	Tokuriki Honten Co., Ltd.	CID001938	JAPAN
Gold	Tongling Nonferrous Metals Group Co., Ltd.	CID001947	CHINA
Gold	TOO Tau-Ken-Altyn	CID002615	KAZAKHSTAN


Gold	Torecom	CID001955	KOREA, REPUBLIC OF
Gold	Umicore Precious Metals Thailand	CID002314	THAILAND
Gold	Umicore S.A. Business Unit Precious Metals Refining	CID001980	BELGIUM
Gold	United Precious Metal Refining, Inc.	CID001993	UNITED STATES OF AMERICA
Gold	Valcambi S.A.	CID002003	SWITZERLAND
Gold	Value Trading	CID003617	BELGIUM
Gold	WEEEREFINING	CID003615	FRANCE
Gold	Western Australian Mint (T/a The Perth Mint)	CID002030	AUSTRALIA
Gold	WIELAND Edelmetalle GmbH	CID002778	GERMANY
Gold	Yamakin Co., Ltd.	CID002100	JAPAN
Gold	Yokohama Metal Co., Ltd.	CID002129	JAPAN
Gold	Yunnan Copper Industry Co., Ltd.	CID000197	CHINA
Gold	Zhongkuang Gold Industry Co., Ltd.	CID002214	CHINA
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CID002224	CHINA
Tantalum	AMG Brasil	CID001076	BRAZIL
Tantalum	D Block Metals, LLC	CID002504	UNITED STATES OF AMERICA
Tantalum	F&X Electro-Materials Ltd.	CID000460	CHINA
Tantalum	FIR Metals & Resource Ltd.	CID002505	CHINA
Tantalum	Global Advanced Metals Aizu	CID002558	JAPAN
Tantalum	Global Advanced Metals Boyertown	CID002557	UNITED STATES OF AMERICA
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CID002492	CHINA
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CID002512	CHINA
Tantalum	Jiangxi Tuohong New Raw Material	CID002842	CHINA
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CID000914	CHINA
Tantalum	Jiujiang Tanbre Co., Ltd.	CID000917	CHINA
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CID002506	CHINA
Tantalum	KEMET de Mexico	CID002539	MEXICO
Tantalum	Materion Newton Inc.	CID002548	UNITED STATES OF AMERICA
Tantalum	Metallurgical Products India Pvt., Ltd.	CID001163	INDIA
Tantalum	Mineração Taboca S.A.	CID001175	BRAZIL
Tantalum	Mitsui Mining and Smelting Co., Ltd.	CID001192	JAPAN
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CID001277	CHINA
Tantalum	NPM Silmet AS	CID001200	ESTONIA
Tantalum	QuantumClean	CID001508	UNITED STATES OF AMERICA

Tantalum	Resind Indústria e Comércio Ltda.	CID002707	BRAZIL
Tantalum	RFH Yancheng Jinye New Material Technology Co., Ltd.	CID003583	CHINA
Tantalum	Solikamsk Magnesium Works OAO	CID001769	RUSSIAN FEDERATION
Tantalum	Taki Chemical Co., Ltd.	CID001869	JAPAN
Tantalum	TANIOBIS Co., Ltd.	CID002544	THAILAND
Tantalum	TANIOBIS GmbH	CID002545	GERMANY
Tantalum	TANIOBIS Japan Co., Ltd.	CID002549	JAPAN
Tantalum	TANIOBIS Smelting GmbH & Co. KG	CID002550	GERMANY
Tantalum	Telex Metals	CID001891	UNITED STATES OF AMERICA
Tantalum	Ulba Metallurgical Plant JSC	CID001969	KAZAKHSTAN
Tantalum	XIMEI RESOURCES (GUANGDONG) LIMITED	CID000616	CHINA
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	CID002508	CHINA
Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	CID001522	CHINA
Tin	Alpha	CID000292	UNITED STATES OF AMERICA
Tin	An Vinh Joint Stock Mineral Processing Company	CID002703	VIET NAM
Tin	Aurubis Beerse	CID002773	BELGIUM
Tin	Aurubis Berango	CID002774	SPAIN
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CID000228	CHINA
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CID003190	CHINA
Tin	China Tin Group Co., Ltd.	CID001070	CHINA
Tin	CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda	CID003486	BRAZIL
Tin	CRM Synergies	CID003524	SPAIN
Tin	CV Ayi Jaya	CID002570	INDONESIA
Tin	CV Venus Inti Perkasa	CID002455	INDONESIA
Tin	Dongguan CiEXPO Environmental Engineering Co., Ltd.	CID003356	CHINA
Tin	Dowa	CID000402	JAPAN
Tin	Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company	CID002572	VIET NAM
Tin	EM Vinto	CID000438	BOLIVIA (PLURINATIONAL STATE OF)
Tin	Estanho de Rondônia S.A.	CID000448	BRAZIL
Tin	Fabrica Auricchio Industria e Comercio Ltda.	CID003582	BRAZIL
Tin	Fenix Metals	CID000468	POLAND
Tin	Gejiu City Fuxiang Industry and Trade Co., Ltd.	CID003410	CHINA
Tin	Gejiu Kai Meng Industry and Trade LLC	CID000942	CHINA
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CID000538	CHINA

Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	CID001908	CHINA
Tin	Gejiu Zili Mining And Metallurgy Co., Ltd.	CID000555	CHINA
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CID003116	CHINA
Tin	Jiangxi New Nanshan Technology Ltd.	CID001231	CHINA
Tin	Luna Smelter, Ltd.	CID003387	RWANDA
Tin	Magnu's Minerais Metais e Ligas Ltda.	CID002468	BRAZIL
Tin	Malaysia Smelting Corporation (MSC)	CID001105	MALAYSIA
Tin	Melt Metais e Ligas S.A.	CID002500	BRAZIL
Tin	Metallic Resources, Inc.	CID001142	UNITED STATES OF AMERICA
Tin	Mineração Taboca S.A.	CID001173	BRAZIL
Tin	Minsur	CID001182	PERU
Tin	Mitsubishi Materials Corporation	CID001191	JAPAN
Tin	Modeltech Sdn Bhd	CID002858	MALAYSIA
Tin	Nghe Tinh Non-Ferrous Metals Joint Stock Company	CID002573	VIET NAM
Tin	Novosibirsk Tin Combine	CID001305	RUSSIAN FEDERATION
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	CID001314	THAILAND
Tin	O.M. Manufacturing Philippines, Inc.	CID002517	PHILIPPINES
Tin	Operaciones Metalúrgicas S.A.	CID001337	BOLIVIA (PLURINATIONAL STATE OF)
Tin	Pongpipat Company Limited	CID003208	MYANMAR
Tin	Precious Minerals and Smelting Limited	CID003409	INDIA
Tin	PT Aries Kencana Sejahtera	CID000309	INDONESIA
Tin	PT Artha Cipta Langgeng	CID001399	INDONESIA
Tin	PT ATD Makmur Mandiri Jaya	CID002503	INDONESIA
Tin	PT Babel Inti Perkasa	CID001402	INDONESIA
Tin	PT Babel Surya Alam Lestari	CID001406	INDONESIA
Tin	PT Bangka Prima Tin	CID002776	INDONESIA
Tin	PT Bangka Serumpun	CID003205	INDONESIA
Tin	PT Bangka Tin Industry	CID001419	INDONESIA
Tin	PT Belitung Industri Sejahtera	CID001421	INDONESIA
Tin	PT Bukit Timah	CID001428	INDONESIA
Tin	PT Cipta Persada Mulia	CID002696	INDONESIA
Tin	PT Menara Cipta Mulia	CID002835	INDONESIA
Tin	PT Mitra Stania Prima	CID001453	INDONESIA
Tin	PT Mitra Sukses Globalindo	CID003449	INDONESIA
Tin	PT Panca Mega Persada	CID001457	INDONESIA
Tin	PT Premium Tin Indonesia	CID000313	INDONESIA

Tin	PT Prima Timah Utama	CID001458	INDONESIA
Tin	PT Putera Sarana Shakti (PT PSS)	CID003868	INDONESIA
Tin	PT Rajawali Rimba Perkasa	CID003381	INDONESIA
Tin	PT Refined Bangka Tin	CID001460	INDONESIA
Tin	PT Sariwiguna Binasantosa	CID001463	INDONESIA
Tin	PT Stanindo Inti Perkasa	CID001468	INDONESIA
Tin	PT Sukses Inti Makmur	CID002816	INDONESIA
Tin	PT Timah Nusantara	CID001486	INDONESIA
Tin	PT Timah Tbk Kundur	CID001477	INDONESIA
Tin	PT Timah Tbk Mentok	CID001482	INDONESIA
Tin	PT Tinindo Inter Nusa	CID001490	INDONESIA
Tin	PT Tirus Putra Mandiri	CID002478	INDONESIA
Tin	PT Tommy Utama	CID001493	INDONESIA
Tin	Resind Indústria e Comércio Ltda.	CID002706	BRAZIL
Tin	Rui Da Hung	CID001539	TAIWAN, PROVINCE OF CHINA
Tin	Super Ligas	CID002756	BRAZIL
Tin	Thaisarco	CID001898	THAILAND
Tin	Tin Smelting Branch of Yunnan Tin Co., Ltd.	CID002180	CHINA
Tin	Tin Technology & Refining	CID003325	UNITED STATES OF AMERICA
Tin	Tuyen Quang Non-Ferrous Metals Joint Stock Company	CID002574	VIET NAM
Tin	VQB Mineral and Trading Group JSC	CID002015	VIET NAM
Tin	White Solder Metalurgia e Mineração Ltda.	CID002036	BRAZIL
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CID002158	CHINA
Tin	Yunnan Yunfan Non-ferrous Metals Co., Ltd.	CID003397	CHINA
Tungsten	A.L.M.T. Corp.	CID000004	JAPAN
Tungsten	ACL Metais Eireli	CID002833	BRAZIL
Tungsten	Albasteel Industria e Comercio de Ligas Para Fundicao Ltd.	CID003427	BRAZIL
Tungsten	Asia Tungsten Products Vietnam Ltd.	CID002502	VIET NAM
Tungsten	China Molybdenum Tungsten Co., Ltd.	CID002641	CHINA
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CID000258	CHINA
Tungsten	CNMC (Guangxi) PGMA Co., Ltd.	CID000281	CHINA
Tungsten	Cronimet Brasil Ltda	CID003468	BRAZIL
Tungsten	Fujian Xinlu Tungsten Co., Ltd.	CID003609	CHINA
Tungsten	Ganzhou Haichuang Tungsten Co., Ltd.	CID002645	CHINA
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	CID000875	CHINA
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CID002315	CHINA

Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CID002494	CHINA
Tungsten	Global Tungsten & Powders LLC.	CID000568	UNITED STATES OF AMERICA
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CID000218	CHINA
Tungsten	H.C. Starck Tungsten GmbH	CID002541	GERMANY
Tungsten	Hubei Green Tungsten Co., Ltd.	CID003417	CHINA
Tungsten	Hunan Chenzhou Mining Co., Ltd.	CID000766	CHINA
Tungsten	Hunan Jintai New Material Co., Ltd.	CID000769	CHINA
Tungsten	Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch	CID002513	CHINA
Tungsten	Hydrometallurg, JSC	CID002649	RUSSIAN FEDERATION
Tungsten	Japan New Metals Co., Ltd.	CID000825	JAPAN
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CID002551	CHINA
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CID002321	CHINA
Tungsten	Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.	CID002313	CHINA
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CID002318	CHINA
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CID002317	CHINA
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CID002316	CHINA
Tungsten	JSC "Kirovgrad Hard Alloys Plant"	CID003408	RUSSIAN FEDERATION
Tungsten	Kennametal Fallon	CID000966	UNITED STATES OF AMERICA
Tungsten	Kennametal Huntsville	CID000105	UNITED STATES OF AMERICA
Tungsten	Lianyou Metals Co., Ltd.	CID003407	TAIWAN, PROVINCE OF CHINA
Tungsten	LLC Vostok	CID003643	RUSSIAN FEDERATION
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CID002319	CHINA
Tungsten	Masan High-Tech Materials	CID002543	VIET NAM
Tungsten	Moliren Ltd.	CID002845	RUSSIAN FEDERATION
Tungsten	Niagara Refining LLC	CID002589	UNITED STATES OF AMERICA
Tungsten	NPP Tyazhmetprom LLC	CID003416	RUSSIAN FEDERATION
Tungsten	OOO "Technolom" 1	CID003614	RUSSIAN FEDERATION
Tungsten	OOO "Technolom" 2	CID003612	RUSSIAN FEDERATION
Tungsten	Philippine Chuangxin Industrial Co., Inc.	CID002827	PHILIPPINES
Tungsten	TANIOBIS Smelting GmbH & Co. KG	CID002542	GERMANY
Tungsten	Unecha Refractory Metals Plant	CID002724	RUSSIAN



			FEDERATION
Tungsten	Wolfram Bergbau und Hütten AG	CID002044	AUSTRIA
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CID002320	CHINA
Tungsten	Xiamen Tungsten Co., Ltd.	CID002082	CHINA
Tungsten	Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.	CID002830	CHINA