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

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**Form SD**

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Specialized Disclosure Report

**Allot Communications Ltd.**

**Israel**  
(State or other jurisdiction of incorporation)

**001-33129**  
(Commission File Number)

**N/A**  
(I.R.S. Employer Identification No.)

**22 Hanagar Street  
Neve Ne'eman Industrial Zone B  
Hod-Hasharon 4501317  
Israel**

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

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2017.

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## SECTION 1 – CONFLICT MINERALS DISCLOSURE

### Item 1.01 Conflict Minerals Disclosure and Report

#### *Introduction*

This Specialized Disclosure Form (“Form SD”) of Allot Communications Ltd. (the “Company,” “we,” or “us”) is filed pursuant to Rule 13p-1 (the “Rule”) promulgated under the Securities Exchange Act of 1934, as amended (the “Exchange Act”), for the reporting period from January 1 to December 31, 2017.

The Rule requires disclosure of certain information when a company manufactures or contracts to manufacture products for which the minerals specified in the Rule are necessary to the functionality or production of those products. The specified minerals are gold, columbite-tantalite (coltan), cassiterite and wolframite, including their derivatives, which are limited to tantalum, tin and tungsten (collectively, the “Conflict Minerals”), that originated in the Democratic Republic of the Congo (“DRC”) and certain adjoining countries (collectively with the DRC, the “Covered Countries”).

#### *Conclusion Based on Reasonable Country of Origin Inquiry*

In accordance with the Rule, the Company has concluded in good faith that during the year ended December 31, 2017:

- Certain of the Company’s operations manufactured, or contracted to manufacture, products (the “Covered Products”) for which the Conflict Minerals are necessary to the functionality or production of those products.
- Based on the Company’s good faith reasonable country of origin inquiry regarding the Conflict Minerals, which was designed to determine whether any of the Conflict Minerals contained in the Company’s Covered Products originated in the Covered Countries and whether any of the Conflict Minerals contained in the Covered Products are or may be from recycled or scrap sources, the Company had reason to believe that (i) the Conflict Minerals contained in its Covered Products may have originated in the Covered Countries and (ii) such Conflict Minerals may not be from recycled or scrap sources.

On the basis of these conclusions, the Company proceeded to exercise due diligence with respect to the source and chain of custody of the Conflict Minerals contained in its Covered Products. The Conflict Minerals Report describing the Company’s due diligence efforts is attached as Exhibit 1.01 to this Form SD for the reporting period from January 1 to December 31, 2017. This Conflict Minerals Report has not been subject to an independent private sector audit.

Countries of origin identified as a result of the Company’s reasonable country of origin inquiry include, to the extent known, Australia, Austria, Belgium, Bolivia, Brazil, Canada, China, Czech Republic, Estonia, France, Germany, India, Indonesia, Italy, Japan, Kazakhstan, Republic of Korea, Kyrgyzstan, Macedonia, Malaysia, Mexico, Netherlands, New Zealand, Peru, Philippines, Poland, Russian Federation, Rwanda, Saudi Arabia, Singapore, South Africa, Spain, Sudan, Sweden, Switzerland, Taiwan, Province Of China, Thailand, Turkey, United Arab Emirates, United States Of America, Uzbekistan, Viet Nam, Zambia and Zimbabwe.

## ***Conflict Minerals Disclosure***

A copy of the Company's Conflict Minerals Report is filed as Exhibit 1.01 to this Form SD, and is publicly available on the Company's website at <http://investors.allot.com/sec.cfm>. Unless otherwise stated in this Form SD and the Conflict Minerals Report filed as Exhibit 1.01 hereto, any documents, third-party materials or references to websites (including the Company's) are not incorporated by reference in, or considered to be a part of, this Form SD and the attached Conflict Minerals Report.

## ***Forward-Looking Statements***

In addition to historical facts, this Form SD and the attached Conflict Minerals Report contain forward-looking statements within the meaning of Section 27A of the U.S. Securities Act of 1933, as amended, Section 21E of the U.S. Securities Exchange Act of 1934, as amended, and the safe harbor provisions of the U.S. Private Securities Litigation Reform Act of 1995. We have based these forward-looking statements on our current expectations and projections about future events. Forward-looking statements include all statements that are not historical facts and can be identified by terms such as "anticipates," "believes," "could," "seeks," "estimates," "expects," "intends," "may," "plans," "potential," "predicts," "projects," "should," "will," "would" or similar expressions that convey uncertainty of future events or outcomes and the negatives of those terms. All forward-looking statements in this Form SD and the attached Conflict Minerals Report reflect our current views about future events, are based on assumptions and are subject to risks and uncertainties that could cause our actual results to differ materially from future results expressed or implied by the forward-looking statements. Many of these factors are beyond our ability to control or predict. Important factors that could cause actual outcomes to differ materially from those contained in any forward-looking statement include those described in the Company's reports, including its annual report on Form 20-F for the fiscal year ended December 31, 2017, and other forms filed by the Company with or furnished by the Company to the Securities and Exchange Commission. You should not put undue reliance on any forward-looking statements. Unless we are required to do so under U.S. federal securities laws or other applicable laws, we do not intend to update or revise any forward-looking statements.

## **Item 1.02 Exhibit**

As specified in Section 2, Item 2.01 of this Form SD, the Company is hereby filing its Conflict Minerals Report as Exhibit 1.01 to this Form SD.

**SECTION 2 – EXHIBITS**

The following exhibit is filed as part of this report.

| <b>Exhibit No.</b> | <b>Description</b>                                    |
|--------------------|---|
| 1.01               | Conflict Minerals Report of Allot Communications Ltd. |

**SIGNATURES**

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

Allot Communications Ltd.

By: /s/ Rael Kolevsohn  
Rael Kolevsohn, General Counsel

May 10, 2018

**EXHIBIT INDEX**

| <b><u>Exhibit No.</u></b> | <b><u>Description</u></b>                             |
|---------------------------|---|
| 1.01                      | Conflict Minerals Report of Allot Communications Ltd. |

**Allot Communications Ltd.**

**Conflict Minerals Report  
For the reporting period from January 1 to December 31, 2017**

**INTRODUCTION**

This Conflict Minerals Report (the “Report”) of Allot Communications Ltd. (“Allot,” “Company,” “we” or “us”) has been prepared pursuant to Rule 13p-1 and Form SD (collectively, the “Rule”) promulgated under the Securities Exchange Act of 1934, as amended, for the reporting period between January 1 and December 31, 2017 (the “2017 calendar year”). The Rule requires disclosure of certain information when a company manufactures or contracts to manufacture products and the minerals specified in the Rule are necessary to the functionality or production of those products. The specified minerals are gold, columbite-tantalite (coltan), cassiterite and wolframite, including their derivatives, which are limited to tantalum, tin and tungsten (collectively, the “Conflict Minerals”), that originated in the Democratic Republic of the Congo (“DRC”) and certain adjoining countries (collectively with the DRC, the “Covered Countries”).

**REASONABLE COUNTRY OF ORIGIN INQUIRY**

Pursuant to the Rule, the Company conducted a good faith reasonable country of origin inquiry (“RCOI”) regarding the Conflict Minerals. This good faith RCOI was reasonably designed to determine whether any of the Conflict Minerals originated in the Covered Countries or whether any of the Conflict Minerals may be from recycled or scrap sources. Following this inquiry, the Company had reason to believe that during the calendar year 2017:

- Allot has manufactured or contracted to manufacture products as to which Conflict Minerals are necessary to the functionality or production of those products; and
- Based on its good faith reasonable country of origin inquiry, Allot has reason to believe that certain of the Conflict Minerals necessary to the functionality or production of such products may have originated from the Covered Countries and has reason to believe that those minerals may not be solely from recycled or scrap sources.

Therefore, the Company had performed due diligence on the source and chain of custody of the Conflict Minerals. There is significant overlap between the Company’s RCOI efforts and its due diligence measures performed. The due diligence measures performed by the Company are discussed below.

Allot is filing this Report with its Form SD as required under the Rule. This Report has not been subject to an independent private sector audit.

**PART I. DESCRIPTION OF THE COMPANY’S PRODUCTS COVERED BY THIS REPORT**

Allot is a provider of leading innovative network intelligence and security solutions for mobile and fixed service providers as well as enterprises worldwide. Allot’s solutions are deployed globally for network and application analytics, traffic control and shaping, network-based security including mobile security, DDoS protection, IoT security, and more. As described in this Report, during the reporting period between January 1 and December 31, 2017, certain of the Company’s operations manufactured, or contracted to manufacture, products for which the Conflict Minerals are necessary to the functionality or production of those products (collectively, the “Covered Products”).

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During the 2017 calendar year, the Covered Products included the following:

- Allot Service Gateway, Sigma E, Allot Service Gateway Tera
  - o Highly scalable mobile platforms that enable Internet providers to manage high-speed broadband performance and to control infrastructure and operating costs; and
  
- NetEnforcer Device Family
  - o Purpose-built devices for monitoring and managing data traffic on enterprise, cloud and broadband service provider networks that provide essential visibility, policy enforcement and traffic steering for a wide range of networks.

## **PART II. THE COMPANY'S DUE DILIGENCE PROCESS**

The Company's due diligence measures have been designed to conform to the five-step framework laid out by the Organization for Economic Co-operation and Development in its OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition (2016) including the related supplements on gold, tin, tantalum and tungsten (collectively, the "OECD Guidance").

### **OECD Guidance Step 1: Establish strong company management systems for conflict minerals supply chain due diligence and reporting compliance.**

*Adopt and commit to a supply chain policy for minerals originating from conflict-affected and high-risk areas.*

The Company has adopted a policy statement relating to the Conflict Minerals (the "Policy"), which incorporates the standards set forth in the OECD Guidance. Specifically, the Policy states that the Company supports the actions of governments and organizations to increase supply chain transparency and enable companies to source conflict-free minerals. Further, the Company has initiated a comprehensive process to meet its regulatory obligations related to the sourcing of Conflict Minerals, taking steps to expand its supply chain due diligence measures and internal controls for the Conflict Minerals.

The Policy is available on the Company's website at <http://www.allot.com/company/get-to-know-allot/quality-management/>.

*Structure internal management systems to support supply chain due diligence.*

The Company's compliance with the Policy and the Rule is overseen by the head of the Company's engineering department. A team of subject matter experts from relevant departments within the Company, including the engineering, quality assurance and legal departments, is collectively responsible for implementing the Company's conflict minerals strategy and compliance processes and for training employees outside of the team on their roles and responsibilities in connection with the compliance program. Additionally, this team meets regularly to assess the progress of the Company's compliance program and reports to management from time to time. As in past years, the team reported progress and results of its due diligence efforts to management at review sessions held at various times throughout the 2017 calendar year.

*Establish a system of controls and transparency over the Conflict Mineral supply chain.*

The Company has established a system of controls to promote transparency over its conflict minerals supply chain by utilizing the Conflict Minerals Reporting Template (as further described below), which is designed to facilitate the transfer of information through the supply chain regarding each mineral's country of origin and the smelters and refiners being utilized for the mineral.

To educate its senior management regarding sourcing practices, the Company has from time to time participated in various focus groups and forums relating to responsible sourcing of Conflict Minerals, including several presentations given by the Institute of Printed Circuits, ILTAM – The Israeli Users' Association of Advanced Technologies in Hi-Tech Integrated Systems.

Consistent with the Company's commitment to sourcing products from suppliers that share its values with regard to human rights, ethics and social and environmental responsibility, as outlined in the Policy, and in compliance with the Rule, the Company has undertaken a multi-stage diligence inquiry to verify the possible sources of the Conflict Minerals contained in the products manufactured or contracted to be manufactured by the Company. The team overseeing the Company's conflict minerals strategy and compliance program led this inquiry, with each focus group listed below tasked with specific responsibilities relating to the due diligence efforts:

- Engineering focus group
  - Identifying and providing information regarding all parts and components used in all products manufactured or contracted to be manufactured by the Company, and all raw materials used in the manufacturing process.
  - Establishing and implementing a new and advance module, within our new Product Lifecycle Management system for tracking and reporting various Green standards data.
  - Finding substitutions for Part, in which their manufacturers fail to comply to the regulation.
  
- Quality Assurance focus group
  - Ensuring that the Company's Policy is addressed and implemented by suppliers in contracts and purchase orders.
  - Promoting transparency and ensuring that information concerning the Company's compliance is available to customers and sales personnel.
  
- Legal focus group
  - Ensuring that the Company complies with relevant laws, regulations and contractual obligations, including the related reporting requirements, contract reviews and other issues.

*Strengthen the Company's engagement with suppliers.*

The Company informs its in-scope manufacturers and suppliers of its materials disclosure requirements, including its compliance with the OECD Guidance and the Rule, and of specification updates that the Company communicates and tracks electronically. Moreover, under the terms of the Company's purchase order and contract terms and conditions, manufacturers and suppliers are expressly required to procure the Conflict Minerals from sources that have been verified as conflict-free and to support the supply chain due diligence process employed by the Company.

*Establish a Company-level grievance mechanism.*

The Company maintains an open reporting system through which employees and third parties may report concerns about potential or actual violations of the Policy. Concerns may be reported anonymously or for attribution through several channels, including through an employee's immediate manager or the Company's legal department.

## **OECD Guidance Step 2: Identify and assess risks in the Company's supply chain.**

### *Identify risks in the supply chain.*

The Company does not purchase Conflict Minerals directly from mines, smelters or refiners. The Company's supply chain with respect to the Covered Products is complex, with multiple intermediaries and third parties in the supply chain between the Company's manufacture of the Covered Products and the original sources of Conflict Minerals. As a result, the Company designed its due diligence to conform to the requirements of the Rule and the OECD Guidance, as applicable for downstream companies. The Company relied and continues to rely on its suppliers to provide information regarding the origin of Conflict Minerals included in the Covered Products. Because the Company believes that the smelters and refiners of the Conflict Minerals are best situated to identify the sources of Conflict Minerals, the Company relied on its linkages to suppliers to identify the applicable smelters and refiners of Conflict Minerals in the Company's supply chain.

The first step in the Company's due diligence process was to determine which products manufactured or contracted to be manufactured by the Company during the 2017 calendar year may fall within the scope of the Rule and which first-tier suppliers and manufacturers the Company ought to engage in its due diligence efforts.

- The engineering focus group reviewed the catalog of the products manufactured or contracted to be manufactured by the Company in the 2017 calendar year to determine which components contain Conflict Minerals necessary to the functionality or production of the products. The Company's Product Lifecycle Management software was used to generate a list of all of the components of these products. Based on the components used in products manufactured or contracted to be manufactured by the Company, the Covered Products were identified. The Covered Products are listed in Part I of this Report.
- The engineering focus group also generated through the Company's Product Lifecycle Management system, a list of the manufacturers or suppliers of the components of the Covered Products, allowing the engineering focus group to identify the Company's first-tier manufacturers and suppliers.
- Based on the engineering focus group's findings, the Company engaged during the 2017 calendar year an expert-consulting agency, GreenSoft Technology, Inc., in order to gather relevant information needed for updating the Company's Product Governance and Compliance module. This module stores information, such as documents received from manufacturers and suppliers, reflecting active components used by the Company and the degree to which the Company's manufacturers and suppliers adhere to relevant laws. In recording this data, the system ensures a fixed tracking of sources of components and raw materials.

Once the final first-tier manufacturer and supplier list was confirmed, all manufacturers and suppliers identified in connection with the Covered Products were then contacted by GreenSoft Technology, Inc. and provided with a supply chain survey in the form of the Conflict Minerals Reporting Template (the "Template") of the Responsible Business Alliance (formerly the Electronic Industry Citizenship Coalition, or the "EEIC") (the "RBA"). The RBA oversees the Responsible Minerals Initiative (formerly the Conflict-Free Sourcing Initiative, or the "CFSI") (the "RMI"). The Company modeled its survey after version 4.01b of the Template. In its cover letter enclosing the survey, GreenSoft Technology, Inc. (i) reiterated the requirements of the Rule and its applicability to the Company, (ii) expressed the company's goal to become a "conflict free" company and its expectation that its suppliers take similar measures with their suppliers, and (iii) requested that each recipient manufacturer or supplier complete the survey for all products supplied to the Company during the 2017 calendar year.

As set forth in the Template and the OECD Guidance, manufacturers and suppliers which completed the survey, made representations or provided information regarding the following:

- the country of origin for the Conflict Minerals contained in the components or products provided by the solicited manufacturer or supplier to the Company;
- whether such Conflict Minerals directly or indirectly finance armed conflict in the Covered Countries;
- all of the smelters in the manufacturer or supplier's supply chain for such Conflict Minerals;

- whether such smelters have been validated as in compliance with the RMI's Responsible Minerals Assurance Process (formerly the Conflict-Free Smelter Program, or the "CFSP") (the "RMAP");
- whether the manufacturer or supplier has its own Conflict Minerals policy that requires its own direct suppliers to be DRC conflict-free; and
- whether the manufacturer or supplier uses the Template with its own suppliers to gather similar information.

*Assess risk in the supply chain.*

The information in the surveys received from manufacturers and suppliers was compared against the RMAP's "conformant" and "active" smelters list. The Company adopted the following multi-step process to evaluate the surveys:

- If correctly completed, each survey identified the smelters and refiners within the solicited supplier's or manufacturer's supply chain. Thus, the Company compared each completed survey against the RMAP's "conformant" and "active" smelters list to determine whether the smelters or refiners associated with the surveyed supplier or manufacturer qualified as "conformant" or "active." The RMAP is a program in which the RMI uses independent third-party auditors to audit the source, including origin of mines and chain of custody, of the Conflict Minerals processed by smelters and refiners which agree to undergo an audit or to take part in a cross-certification program.
  - The smelter or refiner is considered RMAP "conformant" if the audited smelter or refiner (i) completes an independent third-party audit, (ii) adheres to the RMAP's assessment protocols by disclosing to auditors the identities and locations of the mines from which it sources Conflict Minerals, (iii) has been found by its independent third-party auditor to possess the systems and processes to support responsible sourcing of Conflict Minerals and can provide evidence to support its sourcing activities and (iv) maintains good standing in the program, through a continual validation process. The RMI's RMAP "conformant" list (formerly the CFSI's CFSP Conflict-Free Smelter List) includes the names, locations and links to conflict minerals policies of all smelters and refiners deemed compliant with the RMAP's assessment protocols. Smelters and refiners with a "re-audit in progress" are still considered to be RMAP "conformant."
  - Smelters and refiners labeled as RMAP "active" by the RMI (formerly CFSP "active," as determined by the CFSI) have committed to undergo an audit which may be in progress, or are participating in one of the cross-recognized certification programs, namely, the London Bullion Market Association Responsible Gold Certification or Responsible Jewelry Program Chain-of-Custody Certification. "Active" smelters and refiners may be at various stages of the audit cycle, anywhere from completion of the necessary documents to scheduling the audit date to enacting corrective actions in the post-audit phase, but may not retain their "active" status if, among other things, they are unresponsive to requests for re-audit or corrective action past a certain time.
  - Downstream smelters or refiners may not take part in the RMAP. However, they may participate in the RMI's Downstream Audit Program, an independent validation of companies' sourcing practices outside of the RMAP audit process.
- The Company worked with individual manufacturers and suppliers that had questions or concerns regarding the survey modeled after the Template or regarding the Rule.
- Manufacturers and suppliers that returned surveys that appeared to be incomplete or incorrect were contacted again with a follow-up request to provide the missing information or to correct the inaccuracies.
- Manufacturers and suppliers that failed to respond to the follow-up request were issued an official notification by the Company's senior officers informing them that continued refusal could result in cancellation of all contractual engagements.

All completed surveys received from suppliers were stored electronically in a central location accessible to authorized employees of the Company involved in the due diligence process and will be retained in accordance with the Company's document retention guidelines.

Following the process outlined above, as of December 31, 2017, the Company received completed survey responses from approximately 91% of manufacturers and suppliers on the list responsible for manufactured parts used in the Covered Products included in the supply chain survey. The Company relied on the completed surveys it received from its manufacturers and suppliers as the main source of documentation supporting the representations made by such parties regarding the source and chain of custody of relevant Conflict Minerals.

**OECD Guidance Step 3: Design and implement a strategy to respond to identified risks.**

*Report findings to designated senior management.*

The team overseeing the Company's conflict minerals strategy and compliance program reported its due diligence findings to senior management overseeing the supply chain and engineering departments, including the Corporate Quality Assistant Vice President and the Vice President for Operations. All completed surveys from manufacturers and suppliers were stored electronically in a central location accessible to authorized employees in the Company's engineering and legal departments. The Company's quality assurance department was involved in the design and was responsible for the internal audit of the due diligence process.

*Devise, adopt and implement a risk management plan.*

In light of the complexity of the Company's and its suppliers' supply chains, the Company is currently unable to assess adequately all of the risks in its supply chain. However, the Company has taken and continues to take steps to manage risks, including:

- engaging with manufacturers and suppliers to obtain current, accurate and complete information about the Company's supply chains;
- encouraging manufacturers and suppliers to implement responsible sourcing and—based on the Company's status as a downstream company with limited control over smelters and refiners—asking manufacturers and suppliers to encourage smelters and refiners to obtain a "conflict-free" or otherwise RMAP "conformant" designation from an independent, third-party auditor;
- taking part in industry initiatives promoting "conflict-free" supply chains; and
- advocating that our industry membership organizations develop and implement due diligence capability training modules in cooperation with relevant international organizations, non-governmental organizations, stakeholders and other experts.

*Monitor risk mitigation efforts and report back to designated senior management.*

To monitor and track performance of risk management efforts, the Company relies on supplier survey updates and supplier RMAP updates. The status was communicated in meetings of the internal team charged with executing the Company's Conflict Minerals strategy and compliance processes.

The Company employs an escalation process whereby it promptly engages directly with suppliers or manufacturers upon obtaining any information that may indicate that such suppliers or manufacturers may be sourcing Conflict Minerals from any of the Covered Countries. Various steps taken by the Company in such instances may include requiring a contracted supplier or manufacturer to find an alternative source for the Covered Minerals for use in products or components supplied to the Company, or, if appropriate in light of all relevant factors, suspending or terminating a contractual relationship with the supplier or manufacturer. The Company's risk management plan is ultimately to discontinue doing business with any supplier found to be purchasing the Conflict Minerals, the trading of which directly or indirectly finance or benefit armed groups in the Covered Countries, after attempts at corrective actions are not successful.

*Undertake additional fact and risk assessments for risks requiring mitigation, or after a change in circumstances.*

To undertake additional fact and risk assessments for risks requiring mitigation or after a change of circumstances, the Company relies on the supplier re-approval process as governed by its Policy.

**OECD Guidance Step 4: Carry out independent third-party audit of smelter/refiner’s due diligence practices.**

Due to the Company’s position in the supply chain, the Company does not have a direct relationship with smelters and refiners, nor does it perform direct audits of the smelters and refiners that provide its supply chain with the Conflict Minerals contained in the Company’s Covered Products. The Company relies upon industry efforts to influence smelters and refiners to undergo audits and become certified through the RMAP.

**OECD Guidance Step 5: Report annually on supply chain due diligence.**

The Company has filed with the Securities and Exchange Commission its specialized disclosure report on Form SD, which includes this Conflict Minerals Report as Exhibit 1.01, for the reporting period from January 1 to December 31, 2017. In accordance with OECD Guidance and the Rule, the Company has also made these disclosures available on its website at <http://investors.allot.com/sec.cfm>.

**PART III. THE COMPANY’S DUE DILIGENCE FINDINGS AND CONCLUSIONS**

**Country of Origin of the Conflict Minerals in the Covered Products**

Based on the information obtained by the Company during the due diligence process, the Company does not have sufficient information, with respect to the Covered Products, to determine the country of origin of all of the Conflict Minerals in all the Covered Products. However, based on the information that has been obtained, to the extent reasonably determinable by the Company, with respect to the smelters and refineries identified by the Company, such countries of origin are believed to include, to the extent known, Australia, Austria, Belgium, Bolivia, Brazil, Canada, China, Czech Republic, Estonia, France, Germany, India, Indonesia, Italy, Japan, Kazakhstan, Republic of Korea, Kyrgyzstan, Macedonia, Malaysia, Mexico, Netherlands, New Zealand, Peru, Philippines, Poland, Russian Federation, Rwanda, Saudi Arabia, Singapore, South Africa, Spain, Sudan, Sweden, Switzerland, Taiwan, Province Of China, Thailand, Turkey, United Arab Emirates, United States Of America, Uzbekistan, Viet Nam, Zambia and Zimbabwe.

**Facilities Used to Process the Conflict Minerals in the Covered Products**

Following the process outlined above, the Company received responses from approximately 91% of the surveyed suppliers. Therefore, the Company was unable to conclusively determine the origin of all the Conflict Minerals contained in the Covered Products.

However, based on the information that was provided by the Company’s suppliers and otherwise obtained through the due diligence process, the Company believes that, to the extent reasonably determinable by the Company, the facilities that were used to process the Conflict Minerals contained in the Covered Products during the covered period included the smelters and refineries listed on [Appendix A](#) to this Report. The smelters and refiners that the Company has been able to determine as RMAP “conformant” are identified by an asterisk in Appendix A (Smelters which are in “active” RMAP status are identified by two asterisks). The smelters and refiners identified in Appendix A to this Report were identified by our suppliers and the Company cannot be certain that these smelters and refiners were in fact in the Company’s supply chain during the period covered by this Report.

#### **PART IV. IMPLEMENTATION OF STRATEGIES TO RESPOND TO IDENTIFIED RISKS AND FUTURE STEPS**

We have taken, and intend to continue to take, steps to improve our due diligence processes and to minimize the risk that our necessary conflict minerals benefit armed groups. Going forward, the Company plans to continue to engage with its manufacturers and suppliers to obtain current, accurate and complete information about its supply chains and will continue to improve its due diligence efforts to ensure responsible sourcing in compliance with the Policy. The Company also intends to continue its engagement with industry programs, stakeholders and groups to encourage the further adoption, improvement and reliability of relevant programs, tools and standards. The Company intends to monitor the performance and efficiency of its due diligence efforts, to maintain its risk management plan including due diligence reviews of suppliers, smelters and refiners sourcing from the Covered Countries and to establish procedures designed to account for any new risks in the risk management plan. The Company also plans to continue to encourage its suppliers to use conflict-free or otherwise RMAP “conformant” smelters and refiners as capacity becomes available. The Company may also elect to contact smelter and refiner facilities that have not received a “conflict-free” or otherwise RMAP “conformant” designation from an independent third-party audit program, such as the RMAP, to encourage their participation in such a program, request country of origin and chain of custody information, and encourage their participation in an independent third-party audit program, such as the RMAP.

CURRENTLY KNOWN SMELTER AND REFINERY LIST

| Metal | Smelter Name   | Smelter Country          |
|-------|--|--------------------------|
| Gold  | Asahi Pretec Corp.*  | JAPAN                    |
| Gold  | Ishifuku Metal Industry Co., Ltd.*                             | JAPAN                    |
| Gold  | JX Nippon Mining & Metals Co., Ltd.*                           | JAPAN                    |
| Gold  | Matsuda Sangyo Co., Ltd.*                                      | JAPAN                    |
| Gold  | Mitsubishi Materials Corporation*                              | JAPAN                    |
| Gold  | Mitsui Mining and Smelting Co., Ltd.*                          | JAPAN                    |
| Gold  | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.*             | CHINA                    |
| Gold  | Sumitomo Metal Mining Co., Ltd.*                               | JAPAN                    |
| Gold  | Tanaka Kikinzoku Kogyo K.K.*                                   | JAPAN                    |
| Gold  | Tokuriki Honten Co., Ltd.*                                     | JAPAN                    |
| Gold  | Nihon Material Co., Ltd.*                                      | JAPAN                    |
| Gold  | Aida Chemical Industries Co., Ltd.*                            | JAPAN                    |
| Gold  | Allgemeine Gold-und Silberscheideanstalt A.G.*                 | GERMANY                  |
| Gold  | Argor-Heraeus S.A.*  | SWITZERLAND              |
| Gold  | Asahi Refining Canada Ltd.*                                    | CANADA                   |
| Gold  | Asahi Refining USA Inc.*                                       | UNITED STATES OF AMERICA |
| Gold  | Asaka Riken Co., Ltd.*   | JAPAN                    |
| Gold  | Aurubis AG*  | GERMANY                  |
| Gold  | Bangko Sentral ng Pilipinas (Central Bank of the Philippines)* | PHILIPPINES              |
| Gold  | Boliden AB*  | SWEDEN                   |
| Gold  | C. Hafner GmbH + Co. KG*                                       | GERMANY                  |
| Gold  | CCR Refinery - Glencore Canada Corporation*                    | CANADA                   |
| Gold  | Chimet S.p.A.*   | ITALY                    |
| Gold  | Dowa*  | JAPAN                    |
| Gold  | Eco-System Recycling Co., Ltd.*                                | JAPAN                    |
| Gold  | Elemental Refining, LLC*                                       | UNITED STATES OF AMERICA |
| Gold  | Heimerle + Meule GmbH*   | GERMANY                  |
| Gold  | Heraeus Precious Metals GmbH & Co. KG*                         | GERMANY                  |
| Gold  | Istanbul Gold Refinery*  | TURKEY                   |
| Gold  | Kennecott Utah Copper LLC*                                     | UNITED STATES OF AMERICA |
| Gold  | Kojima Chemicals Co., Ltd.*                                    | JAPAN                    |
| Gold  | LS-NIKKO Copper Inc.*  | KOREA, REPUBLIC OF       |
| Gold  | Materion*  | UNITED STATES OF AMERICA |
| Gold  | Metalor Technologies (Hong Kong) Ltd.*                         | CHINA                    |
| Gold  | Metalor Technologies S.A.*                                     | SWITZERLAND              |
| Gold  | Metalor USA Refining Corporation*                              | UNITED STATES OF AMERICA |
| Gold  | Ohura Precious Metal Industry Co., Ltd.*                       | JAPAN                    |
| Gold  | PAMP S.A.*   | SWITZERLAND              |

\* RMAP “conformant,” based on RMI

\*\* RMAP - “active” list

|      |  |                           |
|------|--|---------------------------|
| Gold | Rand Refinery (Pty) Ltd.*  | SOUTH AFRICA              |
| Gold | Republic Metals Corporation*   | UNITED STATES OF AMERICA  |
| Gold | Royal Canadian Mint*   | CANADA                    |
| Gold | Solar Applied Materials Technology Corp.*                                    | TAIWAN, PROVINCE OF CHINA |
| Gold | The Refinery of Shandong Gold Mining Co., Ltd.*                              | CHINA                     |
| Gold | Umicore S.A. Business Unit Precious Metals Refining*                         | BELGIUM                   |
| Gold | United Precious Metal Refining, Inc.*  | UNITED STATES OF AMERICA  |
| Gold | Valcambi S.A.*   | SWITZERLAND               |
| Gold | YAMAMOTO PRECIOUS METAL CO., LTD.*   | JAPAN                     |
| Gold | Yokohama Metal Co., Ltd.*  | JAPAN                     |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation*                         | CHINA                     |
| Gold | Atasay Kuyumculuk Sanayi Ve Ticaret A.S.                                     | TURKEY                    |
| Gold | Jiangxi Copper Co., Ltd.*  | CHINA                     |
| Gold | Metalor Technologies (Singapore) Pte., Ltd.*                                 | SINGAPORE                 |
| Gold | PT Aneka Tambang (Persero) Tbk*  | INDONESIA                 |
| Gold | Samduck Precious Metals*   | KOREA, REPUBLIC OF        |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals*                        | RUSSIAN FEDERATION        |
| Gold | Umicore Brasil Ltda.*  | BRAZIL                    |
| Gold | Umicore Precious Metals Thailand*  | THAILAND                  |
| Gold | Almalyk Mining and Metallurgical Complex (AMMC)*                             | UZBEKISTAN                |
| Gold | Daejin Indus Co., Ltd.*  | KOREA, REPUBLIC OF        |
| Gold | Daye Non-Ferrous Metals Mining Ltd.*   | CHINA                     |
| Gold | DSC (Do Sung Corporation)*   | KOREA, REPUBLIC OF        |
| Gold | DODUCO GmbH*   | GERMANY                   |
| Gold | OJSC Novosibirsk Refinery*   | RUSSIAN FEDERATION        |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.*             | CHINA                     |
| Gold | Japan Mint*  | JAPAN                     |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant*                         | RUSSIAN FEDERATION        |
| Gold | JSC Uralelectromed*  | RUSSIAN FEDERATION        |
| Gold | Kazzinc*   | KAZAKHSTAN                |
| Gold | Moscow Special Alloys Processing Plant*                                      | RUSSIAN FEDERATION        |
| Gold | Navoi Mining and Metallurgical Combinat*                                     | UZBEKISTAN                |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)* | RUSSIAN FEDERATION        |
| Gold | Prioksky Plant of Non-Ferrous Metals*  | RUSSIAN FEDERATION        |
| Gold | Schone Edelmetaal B.V.*  | NETHERLANDS               |
| Gold | Torecom*   | KOREA, REPUBLIC OF        |
| Gold | SAXONIA Edelmetalle GmbH*  | GERMANY                   |
| Gold | WIELAND Edelmetalle GmbH*  | GERMANY                   |
| Gold | Caridad  | MEXICO                    |
| Gold | Chugai Mining  | JAPAN                     |
| Gold | Emirates Gold DMCC*  | UNITED ARAB EMIRATES      |

\* RMAP "conformant," based on RMI

\*\* RMAP - "active" list

|      |   |                           |
|------|---|---------------------------|
| Gold | Gansu Seemine Material Hi-Tech Co., Ltd.                | CHINA                     |
| Gold | Geib Refining Corporation*                              | UNITED STATES OF AMERICA  |
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM*           | CHINA                     |
| Gold | Guangdong Jinding Gold Limited                          | CHINA                     |
| Gold | Guoda Safina High-Tech Environmental Refinery Co., Ltd. | CHINA                     |
| Gold | Hangzhou Fuchunjiang Smelting Co., Ltd.                 | CHINA                     |
| Gold | Hunan Chenzhou Mining Co., Ltd.                         | CHINA                     |
| Gold | HwaSeong CJ Co., Ltd.                                   | KOREA, REPUBLIC OF        |
| Gold | Kaloti Precious Metals                                  | UNITED ARAB EMIRATES      |
| Gold | Kazakhmys Smelting LLC                                  | KAZAKHSTAN                |
| Gold | Singway Technology Co., Ltd.*                           | TAIWAN, PROVINCE OF CHINA |
| Gold | So Accurate Group, Inc.                                 | UNITED STATES OF AMERICA  |
| Gold | T.C.A S.p.A*  | ITALY                     |
| Gold | Tongling Nonferrous Metals Group Co., Ltd.              | CHINA                     |
| Gold | Tony Goetz NV*  | BELGIUM                   |
| Gold | Yunnan Copper Industry Co., Ltd.                        | CHINA                     |
| Gold | Kyrgyzaltyn JSC*  | KYRGYZSTAN                |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd.              | CHINA                     |
| Gold | Penglai Penggang Gold Industry Co., Ltd.                | CHINA                     |
| Gold | Sabin Metal Corp.                                       | UNITED STATES OF AMERICA  |
| Gold | SAMWON METALS Corp.                                     | KOREA, REPUBLIC OF        |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | CHINA                     |
| Gold | Sichuan Tianze Precious Metals Co., Ltd.*               | CHINA                     |
| Gold | Luoyang Zijin Yinhui Gold Refinery Co., Ltd.            | CHINA                     |
| Gold | Metalor Technologies (Suzhou) Ltd.*                     | CHINA                     |
| Gold | Morris and Watson                                       | NEW ZEALAND               |
| Gold | Advanced Chemical Company*                              | UNITED STATES OF AMERICA  |
| Gold | L'azurde Company For Jewelry*                           | SAUDI ARABIA              |
| Gold | Lingbao Gold Co., Ltd.                                  | CHINA                     |
| Gold | Korea Zinc Co., Ltd.*                                   | KOREA, REPUBLIC OF        |
| Gold | MMTC-PAMP India Pvt., Ltd.*                             | INDIA                     |
| Gold | SAAMP*  | FRANCE                    |
| Gold | Remondis Argentia B.V.                                  | NETHERLANDS               |
| Gold | AU Traders and Refiners*                                | SOUTH AFRICA              |
| Gold | AURA-II   | UNITED STATES OF AMERICA  |
| Gold | Bangalore Refinery**                                    | INDIA                     |
| Gold | Modeltech Sdn Bhd**                                     | MALAYSIA                  |
| Gold | Sai Refinery  | INDIA                     |
| Gold | Universal Precious Metals Refining Zambia               | ZAMBIA                    |
| Gold | Safina a.s.   | CZECH REPUBLIC            |
| Gold | TOO Tau-Ken-Altyn                                       | KAZAKHSTAN                |

\* RMAP “conformant,” based on RMI

\*\* RMAP - “active” list

|          |  |                          |
|----------|--|--------------------------|
| Gold     | Abington Reldan Metals, LLC**                                | UNITED STATES OF AMERICA |
| Gold     | Fidelity Printers and Refiners Ltd.                          | ZIMBABWE                 |
| Gold     | Sudan Gold Refinery  | SUDAN                    |
| Gold     | Bauer Walser AG*   | GERMANY                  |
| Gold     | AngloGold Ashanti Corrego do Sitio Mineracao*                | BRAZIL                   |
| Gold     | Heraeus Metals Hong Kong Ltd.*                               | CHINA                    |
| Gold     | SEMPA Joyeria Plateria S.A.*                                 | SPAIN                    |
| Gold     | Western Australian Mint (T/a The Perth Mint)*                | AUSTRALIA                |
| Gold     | Cendres + Metaux S.A.*                                       | SWITZERLAND              |
| Gold     | Metalurgica Met-Mex Penoles S.A. De C.V.*                    | MEXICO                   |
| Gold     | Nadir Metal Rafineri San. Ve Tic. A.S.*                      | TURKEY                   |
| Gold     | PX Precinox S.A.*  | SWITZERLAND              |
| Gold     | Gold Refinery of Zijin Mining Group Co., Ltd.*               | CHINA                    |
| Gold     | KGHM Polska Miedz Spolka Akcyjna**                           | POLAND                   |
| Gold     | Al Etihad Gold LLC   | UNITED ARAB EMIRATES     |
| Gold     | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH* | AUSTRIA                  |
| Gold     | GCC Gujrat Gold Centre Pvt. Ltd.                             | INDIA                    |
| Gold     | Korea Metal Co., Ltd.  | KOREA, REPUBLIC OF       |
| Gold     | OJSC Kolyma Refinery   | RUSSIAN FEDERATION       |
| Gold     | Faggi Enrico S.p.A.  | ITALY                    |
| Gold     | Henan Yuguang Gold & Lead Co., Ltd.                          | CHINA                    |
| Gold     | K.A Rasmussen as   | NORWAY                   |
| Gold     | Shandong Yanggu Xiangguang Co. Ltd.                          | CHINA                    |
| Gold     | Shandong zhongkuang group co., LTD                           | CHINA                    |
| Gold     | KYSHTYM COPPER-ELECTROLYTIC PLANT ZAO                        | RUSSIAN FEDERATION       |
| Gold     | Morris and Watson Gold Coast                                 | AUSTRALIA                |
| Gold     | HeeSung Metal Ltd.*  | KOREA, REPUBLIC OF       |
| Gold     | Italpreziosi*  | ITALY                    |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd.*                  | CHINA                    |
| Tantalum | F&X Electro-Materials Ltd.*                                  | CHINA                    |
| Tantalum | Global Advanced Metals Boyertown*                            | UNITED STATES OF AMERICA |
| Tantalum | H.C. Starck Co., Ltd.*                                       | THAILAND                 |
| Tantalum | H.C. Starck GmbH Laufenburg                                  | GERMANY                  |
| Tantalum | H.C. Starck Hermsdorf GmbH*                                  | GERMANY                  |
| Tantalum | H.C. Starck Inc.*  | UNITED STATES OF AMERICA |
| Tantalum | H.C. Starck Ltd.*  | JAPAN                    |
| Tantalum | H.C. Starck Smelting GmbH & Co. KG*                          | GERMANY                  |
| Tantalum | Solikamsk Magnesium Works OAO*                               | RUSSIAN FEDERATION       |
| Tantalum | Taki Chemical Co., Ltd.*                                     | JAPAN                    |
| Tantalum | Ulba Metallurgical Plant JSC*                                | KAZAKHSTAN               |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd.*                   | CHINA                    |

\* RMAP “conformant,” based on RMI

\*\* RMAP - “active” list

|          |  |                                  |
|----------|--|----------------------------------|
| Tantalum | Conghua Tantalum and Niobium Smeltry*                | CHINA                            |
| Tantalum | D Block Metals, LLC*                                 | UNITED STATES OF AMERICA         |
| Tantalum | Duoluoshan*  | CHINA                            |
| Tantalum | Exotech Inc.*  | UNITED STATES OF AMERICA         |
| Tantalum | Global Advanced Metals Aizu*                         | JAPAN                            |
| Tantalum | Guangdong Zhiyuan New Material Co., Ltd.*            | CHINA                            |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd.*   | CHINA                            |
| Tantalum | Hi-Temp Specialty Metals, Inc.*                      | UNITED STATES OF AMERICA         |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd.*         | CHINA                            |
| Tantalum | LSM Brasil S.A.*                                     | BRAZIL                           |
| Tantalum | Mitsui Mining and Smelting Co., Ltd.*                | JAPAN                            |
| Tantalum | Plansee SE Liezen                                    | AUSTRIA                          |
| Tantalum | Plansee SE Reutte                                    | AUSTRIA                          |
| Tantalum | Telex Metals*  | UNITED STATES OF AMERICA         |
| Tantalum | Yichun Jin Yang Rare Metal Co., Ltd.*                | CHINA                            |
| Tantalum | Zhuzhou Cemented Carbide Group Co., Ltd.*            | CHINA                            |
| Tantalum | King-Tan Tantalum Industry Ltd.*                     | CHINA                            |
| Tantalum | Metallurgical Products India Pvt., Ltd.*             | INDIA                            |
| Tantalum | QuantumClean*  | UNITED STATES OF AMERICA         |
| Tantalum | RFH Tantalum Smeltry Co., Ltd.*                      | CHINA                            |
| Tantalum | FIR Metals & Resource Ltd.*                          | CHINA                            |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd.*        | CHINA                            |
| Tantalum | Jiangxi Tuohong New Raw Material*                    | CHINA                            |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd.*       | CHINA                            |
| Tantalum | KEMET Blue Metals*                                   | MEXICO                           |
| Tantalum | KEMET Blue Powder*                                   | UNITED STATES OF AMERICA         |
| Tantalum | Tranzact, Inc.*                                      | UNITED STATES OF AMERICA         |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd.*       | CHINA                            |
| Tantalum | Power Resources Ltd.*                                | MACEDONIA                        |
| Tantalum | H.C. Starck Tantalum and Niobium GmbH*               | GERMANY                          |
| Tantalum | Jiujiang Nonferrous Metals Smelting Company Limited  | CHINA                            |
| Tantalum | Mineracao Taboca S.A.*                               | BRAZIL                           |
| Tantalum | NPM Silmet AS*                                       | ESTONIA                          |
| Tantalum | Resind Industria e Comercio Ltda.*                   | BRAZIL                           |
| Tantalum | Guizhou Zhenhua Xinyun Technology Ltd., Kaili branch | CHINA                            |
| Tantalum | E.S.R. Electronics                                   | UNITED STATES OF AMERICA         |
| Tantalum | Advanced Metallurgical Group N.V. (AMG)              | UNITED STATES OF AMERICA         |
| Tin      | Malaysia Smelting Corporation (MSC)*                 | MALAYSIA                         |
| Tin      | Minsur*  | PERU                             |
| Tin      | Operaciones Metalurgical S.A.*                       | BOLIVIA (PLURINATIONAL STATE OF) |
| Tin      | Thaisarco*   | THAILAND                         |

\* RMAP “conformant,” based on RMI

\*\* RMAP - “active” list

|     |   |                                  |
|-----|---|----------------------------------|
| Tin | Alpha*  | UNITED STATES OF AMERICA         |
| Tin | China Tin Group Co., Ltd.*  | CHINA                            |
| Tin | CV Serumpun Sebalai*  | INDONESIA                        |
| Tin | CV United Smelting*   | INDONESIA                        |
| Tin | Dowa*   | JAPAN                            |
| Tin | EM Vinto*   | BOLIVIA (PLURINATIONAL STATE OF) |
| Tin | Fenix Metals*   | POLAND                           |
| Tin | Gejiu Non-Ferrous Metal Processing Co., Ltd.*   | CHINA                            |
| Tin | Magnu's Minerai's Metais e Ligas Ltda.*   | BRAZIL                           |
| Tin | Metallo-Chimique N.V.*  | BELGIUM                          |
| Tin | Mitsubishi Materials Corporation*   | JAPAN                            |
| Tin | O.M. Manufacturing Philippines, Inc.*   | PHILIPPINES                      |
| Tin | PT Aries Kencana Sejahtera*   | INDONESIA                        |
| Tin | PT Artha Cipta Langgeng*  | INDONESIA                        |
| Tin | PT Babel Inti Perkasa*  | INDONESIA                        |
| Tin | PT Bangka Tin Industry*   | INDONESIA                        |
| Tin | PT Belitung Industri Sejahtera*   | INDONESIA                        |
| Tin | PT Bukit Timah*   | INDONESIA                        |
| Tin | PT DS Jaya Abadi*   | INDONESIA                        |
| Tin | PT Eunindo Usaha Mandiri*   | INDONESIA                        |
| Tin | PT Inti Stania Prima*   | INDONESIA                        |
| Tin | PT Justindo   | INDONESIA                        |
| Tin | PT Mitra Stania Prima*  | INDONESIA                        |
| Tin | PT Panca Mega Persada*  | INDONESIA                        |
| Tin | PT Prima Timah Utama*   | INDONESIA                        |
| Tin | PT REFINED BANGKA TIN*  | INDONESIA                        |
| Tin | PT Sariwiguna Binasentosa*  | INDONESIA                        |
| Tin | PT Stanindo Inti Perkasa*   | INDONESIA                        |
| Tin | PT Timah (Persero) Tbk Kundur*  | INDONESIA                        |
| Tin | PT Timah (Persero) Tbk Mentok*  | INDONESIA                        |
| Tin | PT Tinindo Inter Nusa*  | INDONESIA                        |
| Tin | PT Wahana Perkit Jaya   | INDONESIA                        |
| Tin | Rui Da Hung*  | TAIWAN, PROVINCE OF CHINA        |
| Tin | Soft Metais Ltda.*  | BRAZIL                           |
| Tin | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.**   | CHINA                            |
| Tin | Yunnan Tin Company Limited*   | CHINA                            |
| Tin | An Vinh Joint Stock Mineral Processing Company  | VIET NAM                         |
| Tin | CV Ayi Jaya*  | INDONESIA                        |
| Tin | CV Gita Pesona*   | INDONESIA                        |
| Tin | CV Venus Inti Perkasa*  | INDONESIA                        |
| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company** | VIET NAM                         |

\* RMAP "conformant," based on RMI

\*\* RMAP - "active" list

|     |  |                          |
|-----|--|--------------------------|
| Tin | Elmet S.L.U.*                                      | SPAIN                    |
| Tin | Gejiu Kai Meng Industry and Trade LLC**            | CHINA                    |
| Tin | Jiangxi Ketai Advanced Material Co., Ltd.*         | CHINA                    |
| Tin | Melt Metais e Ligas S.A.*                          | BRAZIL                   |
| Tin | Metallic Resources, Inc.*                          | UNITED STATES OF AMERICA |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company   | VIET NAM                 |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd.*           | THAILAND                 |
| Tin | PT ATD Makmur Mandiri Jaya*                        | INDONESIA                |
| Tin | PT Bangka Prima Tin*                               | INDONESIA                |
| Tin | PT Cipta Persada Mulia*                            | INDONESIA                |
| Tin | PT Sumber Jaya Indah*                              | INDONESIA                |
| Tin | Tuyen Quang Non-Ferrous Metals Joint Stock Company | VIET NAM                 |
| Tin | VQB Mineral and Trading Group JSC*                 | VIET NAM                 |
| Tin | PT Sukses Inti Makmur*                             | INDONESIA                |
| Tin | PT Karimun Mining*                                 | INDONESIA                |
| Tin | CV Dua Sekawan*                                    | INDONESIA                |
| Tin | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.**   | CHINA                    |
| Tin | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.* | CHINA                    |
| Tin | CV Tiga Sekawan*                                   | INDONESIA                |
| Tin | Gejiu Fengming Metallurgy Chemical Plant*          | CHINA                    |
| Tin | Gejiu Jinye Mineral Company*                       | CHINA                    |
| Tin | Guanyang Guida Nonferrous Metal Smelting Plant*    | CHINA                    |
| Tin | HuiChang Hill Tin Industry Co., Ltd.*              | CHINA                    |
| Tin | Modeltech Sdn Bhd**                                | MALAYSIA                 |
| Tin | Nankang Nanshan Tin Manufactory Co., Ltd.**        | CHINA                    |
| Tin | PT Kijang Jaya Mandiri*                            | INDONESIA                |
| Tin | PT O.M. Indonesia*                                 | INDONESIA                |
| Tin | PT Tommy Utama*                                    | INDONESIA                |
| Tin | CNMC (Guangxi) PGMA Co., Ltd.                      | CHINA                    |
| Tin | Gejiu Zili Mining And Metallurgy Co., Ltd.         | CHINA                    |
| Tin | Huichang Jinshunda Tin Co., Ltd.**                 | CHINA                    |
| Tin | Phoenix Metal Ltd.                                 | RWANDA                   |
| Tin | An Thai Minerals Co., Ltd.                         | VIET NAM                 |
| Tin | PT Tirus Putra Mandiri                             | INDONESIA                |
| Tin | Cooperativa Metalurgica de Rondonia Ltda.          | BRAZIL                   |
| Tin | Mineracao Taboca S.A.*                             | BRAZIL                   |
| Tin | PT BilliTin Makmur Lestari                         | INDONESIA                |
| Tin | White Solder Metalurgia e Mineracao Ltda.*         | BRAZIL                   |
| Tin | Resind Industria e Comercio Ltda.*                 | BRAZIL                   |
| Tin | Estanho de Rondonia S.A.                           | BRAZIL                   |
| Tin | PT Lautan Harmonis Sejahtera*                      | INDONESIA                |

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|          |  |                          |
|----------|--|--------------------------|
| Tin      | PT Menara Cipta Mulia*                                     | INDONESIA                |
| Tin      | Feinhütte Halsbrücke GmbH                                  | GERMANY                  |
| Tin      | Linwu Xianggui Ore Smelting Co., Ltd.                      | CHINA                    |
| Tin      | Metahub Industries Sdn. Bhd.                               | MALAYSIA                 |
| Tin      | Novosibirsk Processing Plant Ltd.                          | RUSSIAN FEDERATION       |
| Tin      | PT Alam Lestari Kencana                                    | INDONESIA                |
| Tin      | PT Bangka Kudai Tin  | INDONESIA                |
| Tin      | PT Bangka Putra Karya                                      | INDONESIA                |
| Tin      | PT Bangka Timah Utama Sejahtera                            | INDONESIA                |
| Tin      | PT Fang Di MulTindo  | INDONESIA                |
| Tin      | PT Seirama Tin investment                                  | INDONESIA                |
| Tin      | PT Pelat Timah Nusantara Tbk                               | INDONESIA                |
| Tin      | Super Ligas  | BRAZIL                   |
| Tin      | CIMSA, S.A.  | SPAIN                    |
| Tin      | Hayes Metals Pty Ltd                                       | NEW ZEALAND              |
| Tin      | Hongqiao Metals (Kunshan) Co., Ltd.                        | CHINA                    |
| Tin      | Shaoxing Tianlong Tin Materials Co., Ltd                   | CHINA                    |
| Tin      | Hunan Xianghualing Tin Co. Ltd                             | CHINA                    |
| Tin      | Jewish Xinmao Tin Co., Ltd.                                | CHINA                    |
| Tin      | Zhongshan Jinye Smelting Co., Ltd                          | CHINA                    |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd.*                      | CHINA                    |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd.*               | CHINA                    |
| Tungsten | Xiamen Tungsten Co., Ltd.*                                 | CHINA                    |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd.*                          | CHINA                    |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd.*               | CHINA                    |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd.*                        | CHINA                    |
| Tungsten | Global Tungsten & Powders Corp.*                           | UNITED STATES OF AMERICA |
| Tungsten | H.C. Starck Smelting GmbH & Co. KG*                        | GERMANY                  |
| Tungsten | Japan New Metals Co., Ltd.*                                | JAPAN                    |
| Tungsten | A.L.M.T. TUNGSTEN Corp.*                                   | JAPAN                    |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd.*              | CHINA                    |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd.*                          | CHINA                    |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd.*                      | CHINA                    |
| Tungsten | Hydrometallurg, JSC*                                       | RUSSIAN FEDERATION       |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd.*           | CHINA                    |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd.*                       | CHINA                    |
| Tungsten | Kennametal Huntsville*                                     | UNITED STATES OF AMERICA |
| Tungsten | Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC* | VIET NAM                 |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd.*                       | VIET NAM                 |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji*           | CHINA                    |
| Tungsten | Niagara Refining LLC*                                      | UNITED STATES OF AMERICA |

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\*\* RMAP - “active” list

|          |  |                          |
|----------|--|--------------------------|
| Tungsten | Hunan Chenzhou Mining Co., Ltd.                                | CHINA                    |
| Tungsten | Kennametal Fallon*   | UNITED STATES OF AMERICA |
| Tungsten | Vietnam Youngsun Tungsten Industry Co., Ltd.*                  | VIET NAM                 |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd.*                     | CHINA                    |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd.*                       | CHINA                    |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd.*                  | CHINA                    |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.* | CHINA                    |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd.*                               | CHINA                    |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd.*                            | CHINA                    |
| Tungsten | Dayu Weiliang Tungsten Co., Ltd.                               | CHINA                    |
| Tungsten | Ganzhou Yatai Tungsten Co., Ltd.                               | CHINA                    |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.          | CHINA                    |
| Tungsten | Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd.*          | CHINA                    |
| Tungsten | Asia Tungsten Products Vietnam Ltd.*                           | VIET NAM                 |
| Tungsten | Philippine Chuangxin Industrial Co., Inc.*                     | PHILIPPINES              |
| Tungsten | South-East Nonferrous Metal Company Limited of Hengyang City*  | CHINA                    |
| Tungsten | ACL Metais Eireli  | BRAZIL                   |
| Tungsten | Jiangxi Dayu Longxintai Tungsten Co., Ltd.                     | CHINA                    |
| Tungsten | Woltech Korea Co., Ltd.*                                       | KOREA, REPUBLIC OF       |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.*   | CHINA                    |
| Tungsten | Unecha Refractory metals plant*                                | RUSSIAN FEDERATION       |
| Tungsten | H.C. Starck Tungsten GmbH*                                     | GERMANY                  |
| Tungsten | Ganzhou Non-ferrous Metals Smelting Co., Ltd.                  | CHINA                    |
| Tungsten | Pobedit, JSC   | RUSSIAN FEDERATION       |
| Tungsten | Wolfram Bergbau und Hutten AG*                                 | AUSTRIA                  |
| Tungsten | Ganzhou Grand Sea W& Mo Group Co., Ltd.                        | CHINA                    |
| Tungsten | Moliren Ltd.*  | RUSSIAN FEDERATION       |
| Tungsten | Ganzhou Haichuang Tungsten Industry Co., Ltd.                  | CHINA                    |
| Tungsten | Dayu Jincheng Tungsten Industry Co., Ltd.                      | CHINA                    |
| Tungsten | Ganxian Shirui New Material Co., Ltd.                          | CHINA                    |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Yanglin             | CHINA                    |
| Tungsten | Sanher Tungsten Vietnam Co., Ltd.                              | VIET NAM                 |

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