

# ACER INCORPORATED 2024 RESPONSIBLE MINERALS REPORT

## **Introduction**

Acer has had a long-standing commitment to ensuring the responsible sourcing of minerals in its supply chain. Our journey began in 2009, when Acer first engaged its suppliers to determine the source of conflict minerals. Shortly after that, Acer joined the Responsible Minerals Initiative (RMI) and was involved in the pilot of the first version of the Conflict Minerals Reporting Template (CMRT) and supported the development of the Responsible Minerals Assurance Process (RMAP). In 2014, Acer released its first conflict minerals report and later that year joined the Public-Private Alliance for Responsible Minerals Trade (PPA) to help support in-region programs that seek to develop minerals tracing systems and spur economic development. For the past two years, Acer has achieved its goal of having 100% of its 3TG SORs conformant or participating in an OECD-aligned 3<sup>rd</sup> party assessment program. For more information, please visit Acer's Responsible Minerals Program.

Acer has developed this RMR, covering the period from January 1 to December 31 of 2024, for the purpose of describing our due diligence efforts on the source and chain of custody of the gold, columbite-tantalite (coltan), cassiterite, wolframite, tantalum, tin, and tungsten (collectively referred to as "3TG") contained in our products that we have reason to believe may have originated from the Democratic Republic of the Congo ("DRC") or an adjoining country (collectively defined as the "Covered Countries") and may not have come from recycled or scrap sources. In addition, this report includes a description of our due diligence efforts to address cobalt in the lithium-ion battery supply chain and mica in coatings. All have been determined to originate from CAHRAs or other areas deemed to be high risk to Acer. Cobalt, mica, and 3TG have all been identified by Acer as priority minerals.

Throughout the report, various terms will be used to describe the minerals due diligence programs for Acer. The term "responsible minerals" generally refers to Acer's minerals due diligence programs. The term "priority minerals" includes minerals that Acer has determined to exist in its supply chain and have a risk of originating from CAHRAS, and finally, "conflict minerals", which refers specifically to the portion of our program and activities related to the sourcing of 3TG from the DRC.

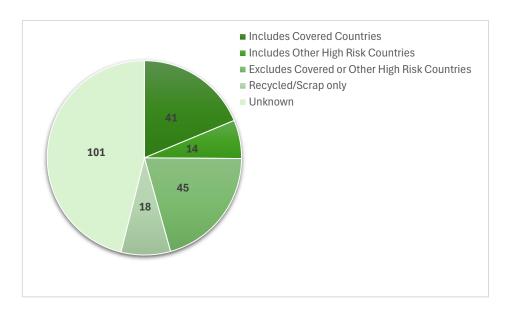
Founded in 1976, Acer is one of the world's top ICT companies with a presence in more than 160 countries. As Acer evolves with the industry and changing lifestyles, it is focused on enabling a world where hardware, software and services will fuse with one another, creating ecosystems and opening up new possibilities for consumers and businesses alike. Acer's 7,700 employees are dedicated to the research, design, marketing, sale, and support of products and solutions that break barriers between people and technology. Please visit <a href="www.acer-group.com">www.acer-group.com</a> for more information.

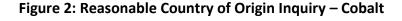
## Reasonable Country of Origin Inquiry (RCOI)

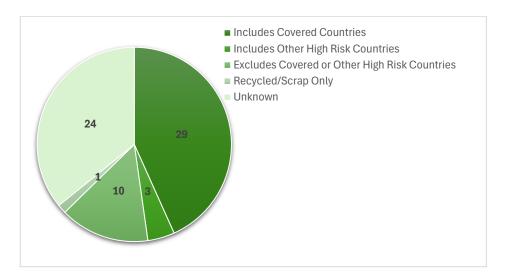
Acer conducted a reasonable country of origin inquiry (RCOI) that employed a combination of measures to determine whether the necessary 3TG and cobalt in Acer's products originated from Covered Countries or other high-risk countries. As a member of the RMI, Acer's primary means of determining country of origin of necessary 3TG and cobalt was by conducting a supply-chain survey with direct suppliers using the CMRT and EMRT. The smelters or refiners (SORs) that were identified as part of this supply chain survey were compared to the list of known SORs that is maintained by the RMI and those that have had their mines of origin verified by an OECD-aligned 3<sup>rd</sup> party assessment program such as the RMAP, London Bullion Market Association's *Responsible Gold Programme* (LBMA), or Responsible Jewelry Council's *Chain-of-Custody Certification Program* (RJC) and made available to RMI members.

When country of origin is unable to be determined from the validation programs mentioned above, Acer turns to other forms of due diligence to conduct its RCOI. This includes direct contact with the SORs, review of outreach and due diligence efforts by industry-led programs, such as the RMI, or outreach results shared by Acer's direct suppliers. In 2024, Acer was able to identify 219 3TG and 67 cobalt SORs in its supply chain. The results of Acer's RCOI are provided in Figures 1 & 2.

Figure 1: Reasonable Country of Origin Inquiry – 3TG







Due to the results of its RCOI, Acer has reason to believe that in some cases, its necessary 3TG and cobalt may have originated in the DRC, Covered Countries, or other high-risk countries and that they may not be from recycled or scrap sources. Consequently, Acer has exercised due diligence on the source and chain of custody of its necessary 3TG and cobalt that conforms to a nationally or internationally recognized due diligence framework and describes those activities in this RMR.

## **Design of Acer's Due Diligence Measures**

Acer developed and implemented a responsible minerals due diligence program to help protect human rights, avoid contributing to conflict, and to minimize social/economic and environmental risks when sourcing any priority minerals. Acer designed and continues to implement its due diligence measures in accordance with the internationally recognized due diligence framework in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("OECD Guidance") and related Supplements for each of the minerals as they relate to downstream companies in the supply chain.

As a brand company, Acer's supply chain has multiple tiers between the company and the mines. Acer does not purchase raw ore or unrefined 3TG or other priority minerals, and does not directly purchase materials in the DRC, Covered Countries, or other CAHRAS. The origin of 3TG and other priority minerals cannot be determined with any certainty once the raw ores are smelted, refined, and converted to ingots, bullion or other mineral containing derivatives. The SORs are consolidating points for raw ore and are in the best position in the supply chain to know the origin of the ores. Our supplier engagement includes the suppliers with which Acer has a direct relationship and has influence over purchasing decisions. These suppliers are considered first tier, and we rely on them to help us identify and assess the risk in the supply chain and provide information on the SORs that supply the priority minerals contained in our products. We also require our first-tier suppliers to pass on Acer's requirements regarding

responsible minerals sources and chains of custody to their own suppliers. In this manner, we work to promote responsible sourcing across our direct and indirect supply chains.

Acer's due diligence includes the following elements of the 5-Step OECD Framework:

mechanism.

- Establish strong company management systems;
   Adopt and commit to a supply chain policy for identifying and managing risks, structure internal management systems to support supply chain due diligence, establish a system of controls and transparency over the supply chain, strengthen company engagement with suppliers, and establish a grievance
- Identify and assess risks in the supply chain;
   Identify the SORs in the supply chain, identify the scope of the risk assessment of the mineral supply chain,
   assess whether the SORs have carried out all elements of due diligence, and where necessary, carry out joint spot checks at the mineral SOR's own facilities.
- 3. Design and implement a strategy to respond to identified risks;
  Report findings to designated senior management, devise and adopt a risk management plan, implement the risk management plan, monitor and track performance of risk mitigation, report back to designated senior management and consider suspending or discontinuing engagement with a supplier after failed attempts at mitigation, and undertake additional fact and risk assessments for risks requiring mitigation or after a change of circumstances.
- 4. Carry out independent third-party audit of smelter/refiner's due diligence practices; Plan an independent third-party audit of the SOR's due diligence.
- Report annually on supply chain due diligence.
   Annually report or integrate, where practicable, into annual sustainability or corporate responsibility reports, additional information on due diligence.

# **Description of Due Diligence Measures Performed**

During the reporting period, Acer performed the following due diligence measures:

- 1. Established strong company management systems
  - Continued support of the cross-functional Responsible Minerals Program Management Team that includes oversight by senior staff to manage all aspects of Acer's responsible minerals due diligence

- program. The management team includes Purchasing, Supply Chain Management, Product Management, Legal and the Environmental, Social, and Governance group.
- Continued to make updates to the internal data management and reporting system (Acer
  Responsible Supply Chain Management System ARSM) to increase the ease of use and to enable
  efficiencies for Acer and its supply chain during supply chain data transfer, supplier engagement and
  capacity building, and the identification and mitigation of risks.
- Updated publicly available responsible minerals policy to reflect due diligence program expansion to
  include new minerals, aluminum, copper, graphite, lithium, and nickel in 2025, and to include the
  development of action plans to address SORs that are not participating in an OECD-aligned 3rd party
  assessment program. The policy provides overall guidance to Acer's responsible minerals program
  and outlines Acer's commitments during the sourcing of minerals (policy available on Acer's
  sustainability website).
- Revised Acer's Responsible Minerals Procedure and Risk Management plan to reflect the additional
  minerals planned in 2025, described above, to bolster Acer's priority minerals determination
  assessment, and to clarify Acer's escalation steps to address unresponsive suppliers, including score
  card impacts and potentially seeking alternative sources of parts and minerals.
- Continued to maintain and monitor a grievance mechanism via whistleblower.acer@acer.com to be
  used specifically by any interested party (e.g. affected person or whistleblower) to raise concerns
  regarding business conduct in Acer's supply chain, including in relation to the extraction and supply
  of minerals.
- Continued to provide capacity building through our annual supplier ESG communication meeting and added functionality to the ARSM system to enable capacity building materials distribution and notifications. Acer provided follow-up training on the ARSM system, updated expectations on achieving program goals, and the global trend to all of the internal personnel with responsibility over responsible minerals program activities as well as all of the 1<sup>st</sup> tier suppliers over which Acer has direct influence.

#### 2. Identify and assess risks in the supply chain

- Conducted Acer's annual conflict minerals survey, requesting information on 3TG sourcing in Acer's supply chain using the CMRT and received 100% direct supplier response rate.
- Conducted Acer's annual cobalt and mica survey using the RMI Extended Minerals Reporting
  Template (EMRT). Acer's lithium-ion battery, hard drive, and final assembly suppliers were surveyed
  for cobalt and we received a 100% response rate. Acer surveyed its final assembly manufacturers
  for mica from coatings suppliers and also received a 100% response rate.
- Consolidated the supplier survey responses for 3TG, cobalt, and mica and compared the results with the RMI known SOR lists and the RMAP to verify true SORs, SOR status, mines of origin, RMAP conformant status, and conflict-free status for 3TG.

- Shared lists of 3TG, cobalt, and mica SORs with the RMI to assist the RMI with maintaining an up-todate list of current SORs.
- Acer continues to conduct audits to verify the presence of an implemented due diligence program, including the existence of their own conflict or responsible minerals policies, evidence of the design and implementation of supply chain due diligence program that includes a risk management plan to identify and mitigate risks, and existence of conflict or responsible minerals reporting. In 2024, Acer audits did not result in any findings.
- Acer continued using the Standards Comparison and Risk Readiness Assessment (RRA) tool offered through the Responsible Business Alliance (RBA). The tool allows Acer to compare suppliers' performance across many different standards, initiatives and certifications, improving our ability to assess and manage risk in our minerals supply chain. Acer continues to request that the SORs in its supply chain register in the RRA system and complete and share the RRA results with us. At the time of the writing of this report, Acer has received RRAs from 188 SOR facilities.

#### 3. Design and implement a strategy to respond to identified risks

- Continued our supplier engagement and feedback process through our internal data management system to enable more effective supplier engagement.
- Continued direct participation in the RMI's Smelter Engagement Team by conducting research on global alleged SORs to help determine if they meet the definition of SORs and if they are eligible for the RMAP program.
- Continued engaging SORs directly for both 3TG, cobalt, and mica to encourage participation in the RMAP and to provide pressure on SORs to remain engaged in the program. In 2024, Acer reached out to 10 SORs directly to encourage participation in the RMAP program.
- Following the submissions of their CMRTs and EMRTs to Acer, suppliers continue to receive the "Smelter Action Required List", which is required to be completed as soon as possible. The suppliers are requested to review the actions required list, taking actions to engage their smelters, and provide an updated report through the ARSM platform. For those suppliers that don't respond with the required actions, the issue is escalated to Acer Purchasing for them to discuss the pending actions with the suppliers.
- Continued our practice from last year of engaging suppliers to provide plans to address high risk SORs and to demand that suppliers cease sourcing materials from certain high risk SORs that have chosen not to participate in the RMAP over the long term or have allowed their conformant status to lapse. In 2024, Acer continued distributing a high risk prohibited SOR list to suppliers that is updated on a quarterly basis. During the 2024 reporting cycle, Acer identified 12 SORs that fit this high-risk category and have directed that they are removed from Acer's supply chain.
- Continued to measure conflict minerals key performance indicators (KPIs) within Acer's supplier ESG scorecard to minimize risk by driving better due diligence and reporting within the supply chain. The majority of Acer suppliers fall into the "good" category. Most of the suppliers that need

improvement are due to late submission of their reporting templates. A summary of the results of our supplier CSR scorecards is provided in Table 1.

**Table 1: ESG Scorecard Results** 

Score Category	Suppliers
Needs Improvement	5.5%
Good	94.5%

- The RMI monitors the Grievance and Complaints Mechanism cases and will periodically raise them
  with membership during SET meetings if they are within the membership's area of influence. Acer
  shall seek to respond to any incidents that are within its area of influence and may provide support
  to the RMI as necessary.
- 4. Carry out independent third-party audit of smelter/refiner's due diligence practices
  - Continued support of the RMAP (member ID: ACER) as an active member of the RBA.
- 5. Report annually on supply chain due diligence
  - Published an updated list of known SORs (3TG, cobalt, and mica) that have been identified in Acer's supply chain as a result of its due diligence measures (see Appendix C).
  - Reported on Acer's supply chain due diligence via this RMR.

## **In-Region Clean Minerals Trade**

Acer continues to believe that projects and organizations that seek to boost economic development, help stabilize the Great Lakes Region, as well as develop systems that feed into the RMAP tools and processes are essential. In addition, Acer realizes that mining is an intensive process involving social and environmental risks that must be managed and involves metals and minerals that extend beyond 3TG and the DRC. As a result, Acer follows and/or supports the organizations below.

- Monitors the activities of the ICGLR-OECD-UN Joint Forum on Responsible Mineral Supply Chains to learn about experiences with regards to implementing the OECD Guidance and opportunities to contribute to in-region programs.
- Acer continued its involvement in the PPA, a multi-sector and multi-stakeholder advocacy group
  that aims to publicize the issue of conflict minerals in the Democratic Republic of the Congo and the
  African Great Lakes Region and propose supply chain solutions. In November of 2024, Acer attended

the thirteenth annual multi-stakeholder membership meeting and was among 34 attendees. The meeting objectives were to connect, network, and build relationships among responsible sourcing and sustainability leaders withing the membership; reflect on the PPA's progress and evolving context driving the revised operational and strategic approach; learn by sharing knowledge on key challenges and solutions in the sector; and identify impactful actions for the PPA members to collaborate on undertaking in the coming year and beyond. The meeting also featured presentations on the state of the PPA and project updates and included membership discussions and feedback.

# **Results of Due Diligence Measures**

As a result of its due diligence measures in 2024, Acer was able to identify 219 unique 3TG, 67 cobalt, and 6 mica SORs in its supply chain that it has reason to believe are legitimate SORs. Acer based this decision on the information received through the consolidation of its supplier survey responses and industry information made available to it through its RMI membership and working group participation.

For the 2024 reporting year, Acer is also providing an update to its progress year-over-year (Figures 3, 4, & 5), which includes the historical results for 3TG, cobalt, mica, and individual metal performance for the current reporting year (Figure 6). All charts include the SOR status as of December 31, 2024 and clearly show the sustained progress Acer has made as a result of its due diligence efforts.

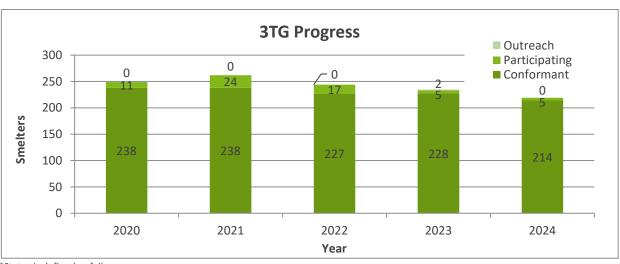


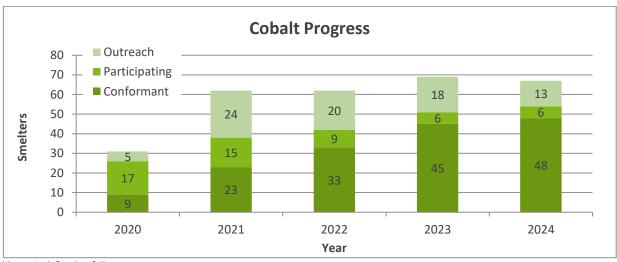
Figure 3: 3TG Progress

\*Status is defined as follows:

Conformant: Smelters or refiners that are conformant to the Responsible Minerals Assurance Process (RMAP) assessment protocols or have been validated by a similar assessment program (e.g., the London Bullion Market Association's *Responsible Gold Programme* or the Responsible Jewelry Council's *Chain-of-Custody Certification Program*)

Participating: Smelters or refiners that have committed to undergo an RMAP audit and are Active or In-Progress Outreach: Smelters or refiners that have not agreed to participate, but Acer is assisting with targeted outreach \*\* Totals include smelters or refiners of gold, tantalum, tin, and tungsten.

Figure 4: Cobalt Progress



<sup>\*</sup>Status is defined as follows:

Conformant: Refiners that are conformant to the Responsible Minerals Assurance Process (RMAP) assessment protocol Participating: Refiners that have committed to undergo an RMAP audit and are Active or In-Progress Outreach: Refiners that have not agreed to participate, but Acer is assisting with targeted outreach

Figure 5: Mica Progress



<sup>\*</sup>Status is defined as follows:

Conformant: Refiners that are conformant to the Responsible Minerals Assurance Process (RMAP) assessment protocol Participating: Refiners that have committed to undergo an RMAP audit and are Active or In-Progress Outreach: Refiners that have not agreed to participate, but Acer is assisting with targeted outreach

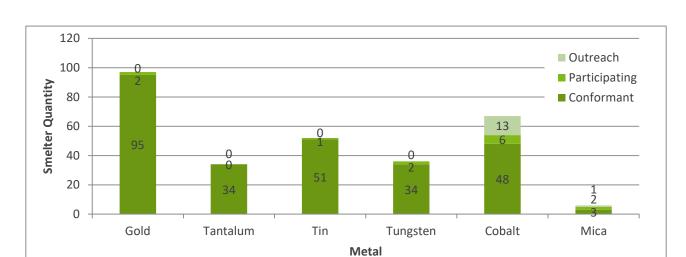


Figure 6: 2024 Status, by metal

\*Status is defined as follows:

Conformant: Smelters or refiners that are compliant with the Responsible Minerals Assurance Process (RMAP) assessment protocols or have been validated by a similar assessment program (e.g., the London Bullion Market Association's *Responsible Gold Programme* or the Responsible Jewelry Council's *Chain-of-Custody Certification Program*)

Participating: Smelters and refiners that have committed to undergo an RMAP audit and are Active or In-Progress Outreach: Smelters or refiners that have not agreed to participate, but Acer is assisting with targeted outreach

Acer included the following appendices to this RMR that provide additional details on the direct suppliers and SORs in Acer's supply chain:

- Appendix A 3TG Supply Chain Indicators additional metrics Acer has identified to track progress within its
   3TG supply chain.
- Appendix B Other Minerals Supply Chain Indicators additional metrics Acer has identified to track progress within its cobalt and mica supply chains.
- Appendix C Smelter or Refiner List– the complete list of SORs that were confirmed to be part of Acer's supply chain during the 2024 reporting period.

For 2024, Acer achieved 100% of its 3TG SORs at either conformant to or participating in an OECD-aligned 3<sup>rd</sup> party assessment program with the goal of becoming conformant. For cobalt, we achieved 81% conformant or participating. Acer continues to believe that the supply chain is dynamic and that the supply chain composition and assessment status is continually changing. Acer will maintain the goal of having 100% of its 3TG SORs either conformant to or participating in an OECD-aligned 3<sup>rd</sup> party assessment program moving forward into 2025, and will increase its goal to 75% of its cobalt SORs either conformant or participating. It is important for Acer to continue to work with its suppliers and conduct due diligence on the minerals supply chains, ensuring that risks are identified and mitigated and that the SORs maintain their assessment conformant status.

## **Future Due Diligence and Risk Mitigation Measures**

Acer will continue to take steps during the next reporting period to improve the due diligence conducted and further mitigate the risk in its supply chain, including:

- Continue to review and update Acer's policies, procedures, risk-management plans, and program metrics to
  ensure they remain progressive, drive continuous improvement, and are tailored accordingly to account for
  additional risks specific to other priority minerals and CAHRAs identified by Acer.
- Support the development of due diligence processes, tools and audit programs for other priority minerals through multi-stakeholder processes, such as those coordinated by the RMI.
- Continue to work with suppliers to increase the accuracy of SOR identification, support SOR engagement, and drive them to source from SORs with a RMAP-conformant status.
- Continue to encourage SORs to participate in the RMAP, with the goal of obtaining a conformant status.
- Continue participation on the RMI Smelter Engagement Team
- Continue supplier audits to evaluate responsible minerals policies and practices within the supply chain downstream from the SORs.
- Continue to measure and grade the due diligence performance of our direct suppliers through our corporate social responsibility scorecard, to prioritize responsible minerals and drive continuous improvement.
- Continue to support in-region projects and organizations that seek to boost economic development, mitigate social and environmental risks, as well as develop systems that feed into the RMAP tools and processes.
- For 2024, our targets are: 100% of 3TG and 75% of cobalt SORs are either conformant to or participating in an OECD-aligned 3<sup>rd</sup> party assessment program.
- Continue improving the identification of mica processors in our supply chain, while adding aluminum,
   copper, graphite, lithium, and nickel to our responsible minerals due diligence program.

Appendix A – 3TG Supply Chain Indicators

Appendix A = 31d Supply			Result		
Indicator	2020	2021	2022	2023	2024
Number of supplier audits conducted	93	89	98	74	111
Number of suppliers in compliance with Acer's program	92	89	98	74	111
Percentage of suppliers that have adopted a conflict minerals policy	100%	100%	100%	100%	100%
<ul> <li>Policy is publicly available on supplier's website</li> </ul>	92%	91%	81%	80%	90%
Suppliers that have required their direct suppliers to source from SORs validated by an independent third-party audit	92%	98%	96%	100%	100%
Percentage of validated SORs in the supply chain that are known to not be sourcing from covered countries	48%	35%	29%	30%	27%
Percentage of validated SORs in the supply chain that are known to be sourcing from covered countries	20%	17%	17%	17%	19%
Quantity of SORs that are known to be sourcing from covered countries (Percentage that are validated)	46 (100%)	44 (100%)	41 (100%)	39 (100%)	39 (100%)
Percentage of Conformant or Participating Smelters (DRC conflict-free)	100%	100%	100%	99%	100%

<u>Appendix B – Other Minerals Supply Chain Indicators</u>

Appendix D Cure in	merais Supply Chain mulcators
Indicator	Result
indicator	2024
Number of supplier audits conducted	111
Number of suppliers in compliance with Acer's program	111
Percentage of suppliers that have adopted a responsible minerals policy	95%
<ul> <li>Policy is publicly available on supplier's website</li> </ul>	76%
Suppliers that have required their direct suppliers to source from SORs validated by an independent third-party audit	76%
Percentage of validated SORs in the supply chain that are known to not be sourcing from covered or other high-risk countries	15%
Percentage of validated SORs in the supply chain that are known to be sourcing from covered or other high-risk countries	48%
Quantity of SORs that are known to be sourcing from covered or other high-risk countries (Percentage that are validated)	32 (100%)
Percentage of Conformant or Participating Smelters	81%

# Appendix C – Smelter or Refiner List

As part of Acer's responsible minerals due diligence efforts, we have published a list of the tantalum, tin, tungsten, gold, cobalt, and mica SORs that have been confirmed to be present in our supply chain. On an annual basis, this list will be updated with the latest status. For the most current information on each SOR, please visit the Responsible Minerals Initiative website at <a href="https://www.responsiblemineralsinitiative.org">www.responsiblemineralsinitiative.org</a>.

Metal	Smelter or Refiner Name	Country	Status* (2023/12/31)	Status* (2024/12/31)
Gold	Abington Reldan Metals, LLC	UNITED STATES OF AMERICA	Conformant	Conformant
Gold	Advanced Chemical Company	UNITED STATES OF AMERICA	Participating	Conformant
Gold	Agosi AG	GERMANY	Conformant	Conformant
Gold	Aida Chemical Industries Co., Ltd.	JAPAN	Conformant	Conformant
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN	Conformant	Conformant
Gold	AngloGold Ashanti Corrego do Sitio Mineracao	BRAZIL	Conformant	Conformant
Gold	Argor-Heraeus S.A.	SWITZERLAND	Conformant	Conformant
Gold	ASAHI METALFINE, Inc.	JAPAN	Conformant	Conformant
Gold	Asahi Refining Canada Ltd.	CANADA	Conformant	Conformant
Gold	Asahi Refining USA Inc.	UNITED STATES OF AMERICA	Conformant	Conformant
Gold	Asaka Riken Co., Ltd.	JAPAN	Conformant	Conformant
Gold	Aurubis AG	GERMANY	Conformant	Conformant
Gold	Bangalore Refinery	INDIA	Outreach	Participating
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES	Conformant	Conformant
Gold	Boliden Ronnskar	SWEDEN	Conformant	Conformant
Gold	C. Hafner GmbH + Co. KG	GERMANY	Conformant	Conformant
Gold	CCR Refinery - Glencore Canada Corporation	CANADA	Conformant	Conformant
Gold	Chimet S.p.A.	ITALY	Conformant	Conformant
Gold	Chugai Mining	JAPAN	Conformant	Conformant
Gold	Coimpa Industrial LTDA	BRAZIL	Conformant	Conformant
Gold	Dowa	JAPAN	Conformant	Conformant
Gold	DSC (Do Sung Corporation)	SOUTH KOREA	Conformant	Conformant
Gold	Eco-System Recycling Co., Ltd. East Plant	JAPAN	Conformant	Conformant
Gold	Eco-System Recycling Co., Ltd. North Plant	JAPAN	Conformant	Conformant
Gold	Eco-System Recycling Co., Ltd. West Plant	JAPAN	Conformant	Conformant
Gold	Elite Industech Co., Ltd.	TAIWAN	NA***	Conformant
Gold	GG Refinery Ltd.	TANZANIA	Participating	Conformant
Gold	Gold by Gold Colombia	COLOMBIA	Conformant	Conformant
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CHINA	Conformant	Conformant
Gold	Heimerle + Meule GmbH	GERMANY	Conformant	Conformant
Gold	Heraeus Germany GmbH Co. KG	GERMANY	Conformant	Conformant
Gold	Heraeus Metals Hong Kong Ltd.	CHINA	Conformant	Conformant
Gold	Impala Platinum - Base Metal Refinery (BMR)	SOUTH AFRICA	Participating	Conformant
Gold	Impala Platinum - Platinum Metals Refinery (PMR)	SOUTH AFRICA	Participating	Participating
Gold	Impala Platinum - Rustenburg Smelter	SOUTH AFRICA	Participating	Conformant
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CHINA	Conformant	Conformant
Gold	Ishifuku Metal Industry Co., Ltd.	JAPAN	Conformant	Conformant
Gold	Istanbul Gold Refinery	TURKEY	Conformant	Conformant
Gold	Italpreziosi	ITALY	Conformant	Conformant

Metal	Smelter or Refiner Name	Country	Status* (2023/12/31)	Status* (2024/12/31)
Gold	Japan Mint	JAPAN	Conformant	Conformant
Gold	Jiangxi Copper Co., Ltd.	CHINA	Conformant	Conformant
Gold	JX Nippon Mining & Metals Co., Ltd.	JAPAN	Conformant	Conformant
Gold	Kazzinc	KAZAKHSTAN	Conformant	Conformant
Gold	Kennecott Utah Copper LLC	UNITED STATES OF AMERICA	Conformant	Conformant
Gold	KGHM Polska Miedz Spolka Akcyjna	POLAND	Conformant	Conformant
Gold	Kojima Chemicals Co., Ltd.	JAPAN	Conformant	Conformant
Gold	Korea Zinc Co., Ltd.	SOUTH KOREA	Conformant	Conformant
Gold	L'Orfebre S.A.**	ANDORRA	Conformant	Conformant
Gold	LS MnM Inc.	SOUTH KOREA	Conformant	Conformant
Gold	LT Metal Ltd.	SOUTH KOREA	Conformant	Conformant
Gold	Materion	UNITED STATES OF AMERICA	Conformant	Conformant
Gold	Matsuda Sangyo Co., Ltd.	JAPAN	Conformant	Conformant
Gold	Metal Concentrators SA (Pty) Ltd.	SOUTH AFRICA	Conformant	Conformant
Gold	Metalor Technologies (Hong Kong) Ltd.	CHINA	Conformant	Conformant
Gold	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE	Conformant	Conformant
Gold	Metalor Technologies (Suzhou) Ltd.	CHINA	Conformant	Conformant
Gold	Metalor Technologies S.A.	SWITZERLAND	Conformant	Conformant
Gold	Metalor USA Refining Corporation	UNITED STATES OF AMERICA	Conformant	Conformant
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	MEXICO	Conformant	Conformant
Gold	Mitsubishi Materials Corporation	JAPAN	Conformant	Conformant
Gold	Mitsui Mining and Smelting Co., Ltd.	JAPAN	Conformant	Conformant
Gold	MKS PAMP SA	SWITZERLAND	Conformant	Conformant
Gold	MMTC-PAMP India Pvt., Ltd.	INDIA	Conformant	Conformant
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	TURKEY	Conformant	Conformant
Gold	Navoi Mining and Metallurgical Combinat	UZBEKISTAN	Conformant	Conformant
Gold	NH Recytech Company	SOUTH KOREA	Conformant	Conformant
Gold	Nihon Material Co., Ltd.	JAPAN	Conformant	Conformant
Gold	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	AUSTRIA	Conformant	Conformant
Gold	Ohura Precious Metal Industry Co., Ltd.	JAPAN	Conformant	Conformant
Gold	Planta Recuperadora de Metales SpA	CHILE	Conformant	Conformant
Gold	PT Aneka Tambang (Persero) Tbk	INDONESIA	Conformant	Conformant
Gold	PX Precinox S.A.	SWITZERLAND	Conformant	Conformant
Gold	Rand Refinery (Pty) Ltd.	SOUTH AFRICA	Conformant	Conformant
Gold	REMONDIS PMR B.V.	NETHERLANDS	Conformant	Conformant
Gold	Royal Canadian Mint	CANADA	Conformant	Conformant
Gold	SAFINA A.S.	CZECHIA	Conformant	Conformant
Gold	SEMPSA Joyeria Plateria S.A.	SPAIN	Conformant	Conformant
Gold	Shandong Gold Smelting Co., Ltd.	CHINA	Conformant	Conformant
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CHINA	Conformant	Conformant
Gold	Sichuan Tianze Precious Metals Co., Ltd.	CHINA	Conformant	Conformant
Gold	Solar Applied Materials Technology Corp.	TAIWAN	Conformant	Conformant
Gold	Sumitomo Metal Mining Co., Ltd.	JAPAN	Conformant	Conformant
Gold	SungEel HiMetal Co., Ltd.	SOUTH KOREA	Conformant	Conformant
Gold	T.C.A S.p.A	ITALY	Conformant	Conformant

Metal	Smelter or Refiner Name	Country	Status* (2023/12/31)	Status* (2024/12/31)
Gold	Tanaka Kikinzoku Kogyo K.K.	JAPAN	Conformant	Conformant
Gold	Tokuriki Honten Co., Ltd.	JAPAN	Conformant	Conformant
Gold	TOO Tau-Ken-Altyn	KAZAKHSTAN	Conformant	Conformant
Gold	Torecom**	SOUTH KOREA	Conformant	Conformant
Gold	Umicore S.A. Business Unit Precious Metals Refining	BELGIUM	Conformant	Conformant
Gold	United Precious Metal Refining, Inc.	UNITED STATES OF AMERICA	Conformant	Conformant
Gold	Valcambi S.A.	SWITZERLAND	Conformant	Conformant
Gold	WEEEREFINING	FRANCE	Conformant	Conformant
Gold	Western Australian Mint (T/a The Perth Mint)	AUSTRALIA	Conformant	Conformant
Gold	WIELAND Edelmetalle GmbH	GERMANY	Conformant	Conformant
Gold	Yamakin Co., Ltd.	JAPAN	Conformant	Conformant
Gold	Yokohama Metal Co., Ltd.	JAPAN	Conformant	Conformant
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA	Conformant	Conformant
Tantalum	AMG Brasil	BRAZIL	Conformant	Conformant
Tantalum	D Block Metals, LLC	UNITED STATES OF AMERICA	Conformant	Conformant
Tantalum	F&X Electro-Materials Ltd.	CHINA	Conformant	Conformant
Tantalum	FIR Metals & Resource Ltd.	CHINA	Conformant	Conformant
Tantalum	Global Advanced Metals Aizu	JAPAN	Conformant	Conformant
Tantalum	Global Advanced Metals Boyertown	UNITED STATES OF AMERICA	Conformant	Conformant
Tantalum	Guangdong Rising Rare Metals-EO Materials Ltd.	CHINA	Participating	Conformant
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA	Conformant	Conformant
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHINA	Conformant	Conformant
Tantalum	Jiangxi Tuohong New Raw Material	CHINA	Conformant	Conformant
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINA	Conformant	Conformant
Tantalum	Jiujiang Tanbre Co., Ltd.	CHINA	Conformant	Conformant
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA	Conformant	Conformant
Tantalum	KEMET de Mexico	MEXICO	Conformant	Conformant
Tantalum	Materion Newton Inc.	UNITED STATES OF AMERICA	Conformant	Conformant
Tantalum	Metallurgical Products India Pvt., Ltd.	INDIA	Conformant	Conformant
Tantalum	Mineracao Taboca S.A.	BRAZIL	Conformant	Conformant
Tantalum	Mitsui Mining and Smelting Co., Ltd.	JAPAN	Conformant	Conformant
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA	Conformant	Conformant
Tantalum	NPM Silmet AS	ESTONIA	Conformant	Conformant
Tantalum	PowerX Ltd.	RWANDA	Conformant	Conformant
Tantalum	QuantumClean	UNITED STATES OF AMERICA	Conformant	Conformant
Tantalum	Resind Industria e Comercio Ltda.	BRAZIL	Conformant	Conformant
Tantalum	RFH Yancheng Jinye New Material Technology Co., Ltd.	CHINA	Conformant	Conformant
Tantalum	Taki Chemical Co., Ltd.	JAPAN	Conformant	Conformant
Tantalum	TANIOBIS Co., Ltd.	THAILAND	Conformant	Conformant
Tantalum	TANIOBIS GmbH	GERMANY	Conformant	Conformant
Tantalum	TANIOBIS Japan Co., Ltd.	JAPAN	Conformant	Conformant
Tantalum	TANIOBIS Smelting GmbH & Co. KG	GERMANY	Conformant	Conformant
Tantalum	Telex Metals	UNITED STATES OF AMERICA	Conformant	Conformant
Tantalum	Ulba Metallurgical Plant JSC	KAZAKHSTAN	Conformant	Conformant
Tantalum	XIMEI RESOURCES (GUANGDONG) LIMITED	CHINA	Conformant	Conformant

Metal	Smelter or Refiner Name	Country	Status* (2023/12/31)	Status* (2024/12/31)
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	CHINA	Conformant	Conformant
Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	CHINA	Conformant	Conformant
Tin	Alpha Assembly Solutions Inc	UNITED STATES OF AMERICA	Conformant	Conformant
Tin	Aurubis Beerse	BELGIUM	Conformant	Conformant
Tin	Aurubis Berango	SPAIN	Conformant	Conformant
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CHINA	Conformant	Conformant
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CHINA	Conformant	Conformant
Tin	China Tin Group Co., Ltd.	CHINA	Conformant	Conformant
Tin	CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda	BRAZIL	Conformant	Conformant
Tin	CRM Synergies	SPAIN	Conformant	Conformant
Tin	Dowa	JAPAN	Conformant	Conformant
Tin	EM Vinto	BOLIVIA	Conformant	Conformant
Tin	Estanho de Rondonia S.A.	BRAZIL	Conformant	Conformant
Tin	Fabrica Auricchio Industria e Comercio Ltda.**	BRAZIL	Conformant	Conformant
Tin	Fenix Metals	POLAND	Conformant	Conformant
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA	Conformant	Conformant
Tin	Global Advanced Metals Greenbushes Pty Ltd.	AUSTRALIA	NA***	Conformant
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CHINA	Conformant	Conformant
Tin	HuiChang Hill Tin Industry Co., Ltd.	CHINA	Conformant	Conformant
Tin	Jiangxi New Nanshan Technology Ltd.	CHINA	Conformant	Conformant
Tin	Luna Smelter, Ltd.	RWANDA	Conformant	Conformant
Tin	Magnu's Minerais Metais e Ligas Ltda.	BRAZIL	Conformant	Conformant
Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA	Conformant	Conformant
Tin	Malaysia Smelting Corporation Berhad (Port Klang)	MALAYSIA	Participating	Conformant
Tin	Metallic Resources, Inc.	UNITED STATES OF AMERICA	Conformant	Conformant
Tin	Mineracao Taboca S.A.	BRAZIL	Conformant	Conformant
Tin	Mining Minerals Resources SARL	DEMOCRATIC REPUBLIC OF THE CONGO	Conformant	Conformant
Tin	Minsur	PERU	Conformant	Conformant
Tin	Mitsubishi Materials Corporation	JAPAN	Conformant	Conformant
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND	Conformant	Conformant
Tin	O.M. Manufacturing Philippines, Inc.	PHILIPPINES	Conformant	Conformant
Tin	Operaciones Metalurgicas S.A.	BOLIVIA	Conformant	Conformant
Tin	Precious Minerals and Smelting Limited**	INDIA	Participating	Participating
Tin	PT ATD Makmur Mandiri Jaya	INDONESIA	Conformant	Conformant
Tin	PT Bangka Prima Tin	INDONESIA	Conformant	Conformant
Tin	PT Cipta Persada Mulia	INDONESIA	Conformant	Conformant
Tin	PT Mitra Stania Prima	INDONESIA	Conformant	Conformant
Tin	PT Mitra Sukses Globalindo	INDONESIA	Conformant	Conformant
Tin	PT Premium Tin Indonesia	INDONESIA	Conformant	Conformant
Tin	PT Putera Sarana Shakti (PT PSS)	INDONESIA	Conformant	Conformant
Tin	PT Rajehan Ariq	INDONESIA	Conformant	Conformant
Tin	PT Timah Tbk Kundur	INDONESIA	Conformant	Conformant
Tin	PT Timah Tbk Mentok	INDONESIA	Conformant	Conformant
	Resind Industria e Comercio Ltda.	BRAZIL	Conformant	Conformant

Metal	Smelter or Refiner Name	Country	Status* (2023/12/31)	Status* (2024/12/31)
Tin	Rui Da Hung	TAIWAN	Conformant	Conformant
Tin	Super Ligas	BRAZIL	Conformant	Conformant
Tin	Takehara PVD Materials Plant / PVD Materials Division of MITSUI MINING & SMELTING CO., LTD.	JAPAN	Outreach	Conformant
Tin	Thaisarco	THAILAND	Conformant	Conformant
Tin	Tin Smelting Branch of Yunnan Tin Co., Ltd.	CHINA	Conformant	Conformant
Tin	Tin Technology & Refining	UNITED STATES OF AMERICA	Conformant	Conformant
Tin	White Solder Metalurgia e Mineracao Ltda.	BRAZIL	Conformant	Conformant
Tin	Woodcross Smelting Company Limited	UGANDA	Outreach	Conformant
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA	Conformant	Conformant
Tin	Yunnan Yunfan Non-ferrous Metals Co., Ltd.	CHINA	Conformant	Conformant
Tungsten	A.L.M.T. Corp.	JAPAN	Conformant	Conformant
Tungsten	Asia Tungsten Products Vietnam Ltd.	VIET NAM	Conformant	Conformant
Tungsten	China Molybdenum Tungsten Co., Ltd.	CHINA	Conformant	Conformant
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA	Conformant	Conformant
Tungsten	Cronimet Brasil Ltda	BRAZIL	Conformant	Conformant
Tungsten	Fujian Xinlu Tungsten Co., Ltd.	CHINA	Conformant	Conformant
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHINA	Conformant	Conformant
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA	Conformant	Conformant
Tungsten	Global Tungsten & Powders LLC	UNITED STATES OF AMERICA	Conformant	Conformant
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CHINA	Conformant	Conformant
Tungsten	H.C. Starck Tungsten GmbH	GERMANY	Conformant	Conformant
Tungsten	Hubei Green Tungsten Co., Ltd.	CHINA	Conformant	Conformant
Tungsten	Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch	CHINA	Conformant	Conformant
Tungsten	Japan New Metals Co., Ltd.	JAPAN	Conformant	Conformant
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA	Conformant	Conformant
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CHINA	Conformant	Conformant
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHINA	Conformant	Conformant
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CHINA	Conformant	Conformant
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CHINA	Conformant	Conformant
Tungsten	Kenee Mining Corporation Vietnam	VIET NAM	Participating	Participating
Tungsten	Kennametal Fallon	UNITED STATES OF AMERICA	Conformant	Conformant
Tungsten	Kennametal Huntsville	UNITED STATES OF AMERICA	Conformant	Conformant
Tungsten	Lianyou Metals Co., Ltd.	TAIWAN	Conformant	Conformant
Tungsten	Lianyou Resources Co., Ltd.	TAIWAN	Participating	Conformant
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CHINA	Conformant	Conformant
Tungsten	Masan High-Tech Materials	VIET NAM	Conformant	Conformant
Tungsten	Niagara Refining LLC	UNITED STATES OF AMERICA	Conformant	Conformant
Tungsten	Philippine Bonway Manufacturing Industrial Corporation	PHILIPPINES	NA***	Conformant
Tungsten	Philippine Carreytech Metal Corp.	PHILIPPINES	Outreach	Participating
Tungsten	Philippine Chuangxin Industrial Co., Inc.	PHILIPPINES	Conformant	Conformant
Tungsten	Shinwon Tungsten (Fujian Shanghang) Co., Ltd.	CHINA	Conformant	Conformant
Tungsten	TANIOBIS Smelting GmbH & Co. KG	GERMANY	Conformant	Conformant
Tungsten	Tungsten Vietnam Joint Stock Company	VIET NAM	Conformant	Conformant

Metal	Smelter or Refiner Name	Country	Status* (2023/12/31)	Status* (2024/12/31)
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CHINA	Conformant	Conformant
Tungsten	Xiamen Tungsten Co., Ltd.	CHINA	Conformant	Conformant
Cobalt	Anhui Hanrui New Material Co., Ltd.	CHINA	Conformant	Conformant
Cobalt	Chemaf Etoile	DEMOCRATIC REPUBLIC OF THE CONGO	Conformant	Conformant
Cobalt	Compagnie de Tifnout Tiranimine	MOROCCO	Conformant	Conformant
Cobalt	Cosmo Chemical, Ltd.**	SOUTH KOREA	Conformant	Conformant
Cobalt	Dynatec Madagascar Company	MADAGASCAR	Conformant	Conformant
Cobalt	Eti Bakir A.S	TURKEY	Conformant	Conformant
Cobalt	Fairsky Industrial Co., Limited	CHINA	Outreach	Outreach
Cobalt	Fujian Evergreen New Energy Technology Co.	CHINA	Participating	Conformant
Cobalt	Ganzhou Highpower Technology Co., Ltd.	CHINA	Conformant	Conformant
Cobalt	Ganzhou Tengyuan Cobalt New Material Co., Ltd.	CHINA	Conformant	Conformant
Cobalt	Gem (Jiangsu) Cobalt Industry Co., Ltd.	CHINA	Conformant	Conformant
Cobalt	Glencore Nikkelverk Refinery	NORWAY	Outreach	Outreach
Cobalt	Guangdong Fangyuan New Materials Group Co., Ltd.**	CHINA	Participating	Participating
Cobalt	Guangdong Jiana Energy Technology Co., Ltd.	CHINA	Conformant	Conformant
Cobalt	Guangxi Yinyi Advanced Material Co., Ltd.	CHINA	Conformant	Conformant
Cobalt	Guizhou CNGR Resource Recycling Industry Development Co., Ltd.	CHINA	Conformant	Conformant
Cobalt	Guizhou Red Star Electronic Material Co., Ltd.	CHINA	Outreach	Participating
Cobalt	Harima Refinery, Sumitomo Metal Mining	JAPAN	Conformant	Conformant
Cobalt	Hunan Brunp Recycling Technology Co., Ltd.	CHINA	Outreach	Participating
Cobalt	Hunan CNGR New Energy Science & Technology Co., Ltd.	CHINA	Conformant	Conformant
Cobalt	Hunan Yacheng New Energy Co., Ltd.	CHINA	Conformant	Conformant
Cobalt	ICoNiChem	UNITED KINGDOM	Participating	Participating
Cobalt	Impala Platinum - Base Metal Refinery (BMR)	SOUTH AFRICA	Participating	Conformant
Cobalt	Impala Platinum - Rustenburg Smelter	SOUTH AFRICA	Participating	Conformant
Cobalt	Jiangsu Xiongfeng Technology Co., Ltd.	CHINA	Conformant	Conformant
Cobalt	Jiangxi Jiangwu Cobalt Industrial Co., Ltd.	CHINA	Conformant	Conformant
Cobalt	Jiangxi Miracle Golden Tiger Cobalt Co. Ltd.	CHINA	Conformant	Conformant
Cobalt	Jiangxi Ruida New Energy Technology Co., Ltd.	CHINA	Participating	Participating
Cobalt	Jingmen GEM Co., Ltd.	CHINA	Conformant	Conformant
Cobalt	Kamoto Copper Company	DEMOCRATIC REPUBLIC OF THE CONGO	Conformant	Conformant
Cobalt	Kisanfu Mining (Kimin)	DEMOCRATIC REPUBLIC OF THE CONGO	Conformant	Conformant
Cobalt	La Compagnie de Traitement des Rejets de Kingamyambo S.A. (Metalkol S.A.)	DEMOCRATIC REPUBLIC OF THE CONGO	Conformant	Conformant
Cobalt	Lanzhou Jinchuan Advanced Materials Technology Co., Ltd.	CHINA	Conformant	Conformant
Cobalt	Lianyou Resources Co., Ltd.	TAIWAN	Participating	Conformant
Cobalt	LUILU RESSOURCES SAS	DEMOCRATIC REPUBLIC OF THE CONGO	Participating	Participating
Cobalt	Mechema Chemicals (Thailand) Co., Ltd.	THAILAND	Outreach	Outreach
Cobalt	Mechema Chemicals shang-yu	CHINA	Outreach	Outreach
Cobalt	Mechema Korea, Co., Ltd.	SOUTH KOREA	Outreach	Outreach
Cobalt	Mechema Taiwan Plant 1	TAIWAN	Outreach	Outreach
Cobalt	Mechema Taiwan Plant 2	TAIWAN	Conformant	Conformant
Cobalt	METAL MINES SARL	DEMOCRATIC REPUBLIC OF THE CONGO	Outreach	Outreach

Metal	Smelter or Refiner Name	Country	Status* (2023/12/31)	Status* (2024/12/31)
Cobalt	Mine de Bou-Azzer	MOROCCO	Conformant	Conformant
Cobalt	MKM - La Miniere de Kalumbwe Myunga	DEMOCRATIC REPUBLIC OF THE CONGO	Outreach	Outreach
Cobalt	Murrin Murrin Nickel Cobalt Plant	AUSTRALIA	Conformant	Conformant
Cobalt	Mutanda Mining SPRL	DEMOCRATIC REPUBLIC OF THE CONGO	Conformant	Conformant
Cobalt	Niihama Nickel Refinery, Sumitomo Metal Mining	JAPAN	Conformant	Conformant
Cobalt	Ningbo Yanmen Chemical Co., Ltd.	CHINA	Outreach	Outreach
Cobalt	NORILSK NICKEL HARJAVALTA OY	FINLAND	Conformant	Conformant
Cobalt	Port Colborne Refinery	CANADA	Conformant	Conformant
Cobalt	PT Mechema Indonesia	INDONESIA	Outreach	Outreach
Cobalt	PT QMB New Energy Materials	INDONESIA	Outreach	Conformant
Cobalt	Quzhou Huayou Cobalt New Material Co., Ltd.	CHINA	Conformant	Conformant
Cobalt	Ruashi Mining SAS	DEMOCRATIC REPUBLIC OF THE CONGO	Outreach	Outreach
Cobalt	Societe pour le Traitment du Terril de Lubumbashi (STL)	DEMOCRATIC REPUBLIC OF THE CONGO	Conformant	Conformant
Cobalt	SungEel HiTech Co., Ltd.	SOUTH KOREA	Conformant	Conformant
Cobalt	Tenke Fungurume Mining SA	DEMOCRATIC REPUBLIC OF THE CONGO	Participating	Conformant
Cobalt	Tianjin Maolian Science & Technology Co., Ltd.	CHINA	Conformant	Conformant
Cobalt	Umicore Finland Oy	FINLAND	Conformant	Conformant
Cobalt	Umicore Olen	BELGIUM	Conformant	Conformant
Cobalt	Uranus Chemicals	TAIWAN	Conformant	Conformant
Cobalt	Vale - Long Harbour Processing Plant (LHPP)	CANADA	Outreach	Conformant
Cobalt	Xiangtan Huacheng Nickel Cobalt New Material Co., Ltd.	CHINA	Outreach	Outreach
Cobalt	XTC New Energy Materials (Xiamen) LTD.	CHINA	Outreach	Outreach
Cobalt	Zhejiang Greatpower Cobalt Materials Co., Ltd.	CHINA	Conformant	Conformant
Cobalt	Zhejiang Huayou Cobalt Company Limited	CHINA	Conformant	Conformant
Cobalt	Zhejiang New Era Zhongneng Technology Co., Ltd.	CHINA	Conformant	Conformant
Cobalt	Zhuhai Kelixin Metal Materials Co., Ltd.	CHINA	Conformant	Conformant
Mica	DARUKA MINCHEM PVT.LTD**	INDIA	Participating	Participating
Mica	Imerys Mica Kings Mountain, Inc.	UNITED STATES OF AMERICA	Outreach	Outreach
Mica	Mica Electrical Material (Luhe) Co., Ltd.	CHINA	Outreach	Participating
Mica	Yamaguchi Mica	JAPAN	Participating	Conformant
Mica	Yamaguchi Mica Co., Ltd. Shinshiro Factory	JAPAN	Participating	Conformant
Mica	Yamaguchi Mica Co., Ltd. Toyohashi Factory	JAPAN	Participating	Conformant

<sup>\*</sup>Status is defined as follows:

<sup>-</sup> Conformant: Smelters or refiners that are compliant with the Responsible Minerals Assurance Process (RMAP) assessment protocols or have been validated by a similar validation program (e.g., the London Bullion Market Association's Responsible Gold Programme or the Responsible Jewelry Council's Chain-of-Custody Certification Program)

<sup>-</sup> Participating: Smelters or refiners that have committed to undergo an RMAP audit and are Active or In-Progress

<sup>-</sup> Outreach: Smelters or refiners that have not agreed to participate, but Acer is assisting with targeted outreach

<sup>\*\*</sup>SORs that were conformant or participating in 2024 but became non conformant in 2025. Acer is in the process of working with its suppliers to remove the SORs from its supply chain.

<sup>\*\*\*</sup>The smelter was not identified as a smelter by the RMI or Acer on or before 12/31/2023. The smelter did not have a status until 2024.

## **Countries of Origin**

Countries of origin for minerals processed by 3TG and cobalt smelters or refiners in Acer's supply chain, which are based on sourcing information disclosed during the RMAP third-party auditing process, may have originated from the following countries, as well as from recycled and scrap sources.

## Countries of Origin - 3TG

Andorra Dominican Republic Antigua and Barbuda Ecuador Argentina Egypt Australia El Salvador Austria Estonia **Bahamas** Ethiopia Barbados Finland Belgium France Benin Germany Bolivia Greece Bosnia and Herzegovina Grenada Brazil Guatemala Bulgaria Guyana Burkina Faso Honduras Burundi Hong Kong Cameroon Hungary Canada India Cayman Islands Indonesia Chile Ireland China Israel Colombia Italy Costa Rica Jamaica Côte d'Ivoire Japan Croatia Jordan

Malaysia Sierra Leone Mali Singapore Malta Sint Maarten Mexico Slovakia Mongolia South Africa Morocco South Korea Mozambique Spain Myanmar Sweden Namibia Switzerland Netherlands Taiwan New Zealand Tanzania Nicaragua Thailand Niger Trinidad and Tobago Nigeria Tunisia Turkey Oman Panama Uganda Papua New Guinea Ukraine Peru United Arab Emirates

**Philippines United Kingdom** United States of America Poland Portugal Uruguay Uzbekistan Puerto Rico Romania Venezuela Russia\* Vietnam Rwanda Zambia Saint Kitts and Nevis Zimbabwe

Democratic Republic of the Congo Lithuania Saint Vincent and Grenadines

Denmark Luxembourg Senegal
Dominica Madagascar Serbia

Laos

Latvia

#### Countries of Origin - Cobalt

Curacao

Czech Republic

Australia France Malaysia South Korea Austria Taiwan Germany Morocco New Caledonia Turkey Brazil Hungary Canada India Papua New Guinea United States of America

China Indonesia Philippines Zambia

Democratic Republic of the Congo Japan Russia\* Zimbabwe

Finland Madagascar Singapore

<sup>\*</sup>Acer does not source minerals directly from Russia. The RMI provides general country of origin information to Acer and may include countries that are not specific to Acer's supply chain.