



## ACER INCORPORATED 2014 CONFLICT MINERALS REPORT

### **Introduction**

Acer has developed this Conflict Minerals Report (CMR), covering the period from January 1 to December 31 of 2014, 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.

Established in 1976, Acer is dedicated to the research, design, marketing, sale and support of innovative products and services that enhance people's lives. Acer employs 7,000 people and ranks No. 4 for total PCs globally (IDC 2014). Revenues for 2014 reached US\$10.39 billion. Please visit [www.acer.com](http://www.acer.com) 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 in Acer’s products originated from the Covered Countries. As a member of the Conflict-Free Sourcing Initiative (CFSI), Acer’s primary means of determining country of origin of necessary 3TG was by conducting a supply-chain survey with direct suppliers using the CFSI Conflict Minerals Reporting Template (CMRT). 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 CFSI and those that have had their mines of origin verified by the [Conflict-Free Smelter program \(CFSP\)](#).

Due to the results of its RCOI, Acer has reason to believe that its necessary 3TG may have originated in the Democratic Republic of the Congo or an adjoining country and has reason to believe 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 that conforms to a nationally or internationally recognized due diligence framework, and describes those activities in this CMR.

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

Acer developed and implemented a due diligence program to help protect human rights and to avoid contributing to conflict as a result of its sourcing decisions. Acer designed its due diligence measures to be in conformance 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, and does not purchase materials in the DRC or an adjoining country. The origin of 3TG cannot be determined with any certainty once the raw ores are smelted, refined and converted to ingots, bullion or other conflict mineral containing derivatives. The SORs are consolidating points for raw ore and are in the best position in the total 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 3TG contained in our products.

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

1. 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 transparency in the supply chain, strengthen company engagement with suppliers, and establish a grievance mechanism.
2. 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; and  
Plan an independent third party audit of the SOR's due diligence.
5. 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 an internal team that includes oversight by senior staff to manage all aspects of Acer's conflict minerals due diligence program;
  - Reviewed Acer's conflict minerals policy to ensure continued relevancy in the second year of the program ([available on Acer's sustainability website](#));
  - Revised Acer's internal conflict minerals procedure to reflect minor changes to terminology, SOR information tracking and identification procedures, and to set a goal to achieve conflict-free status in 2016;
  - Continued to maintain and monitor a grievance mechanism via Acer's general corporate responsibility email address ([cr@acer.com](mailto:cr@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; and
  - Provided follow-up training on its conflict minerals policy and procedure to all of the internal personnel with responsibility over conflict 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 third conflict minerals survey, requesting information on Acer's supply chain using the CMRT and received 87% direct supplier response rate. Due to the onboarding of several new suppliers with limited conflict minerals experience, Acer was unable to achieve a 100% response rate in 2014. Acer will continue to build capacity with these suppliers to ensure a response during the next survey round;
- Consolidated the supplier survey responses and compared the results with the CFSI known SOR lists and the CFSP to verify true SORs, mines of origin, and to determine the conflict-free status; and
- Added additional check points to Acer's routine audits of direct suppliers to verify the presence of an implemented due diligence program, including the existence of their own conflict minerals policy, evidence of the design and implementation of supply chain due diligence program that includes a risk management plan to identify and address red flags, and existence of conflict minerals reporting; and
- Continued conducting research on alleged SORs, contacting them via telephone and/or email to verify them as true SORs, identifying SOR alias names and relating them to alleged or true SORs, contacting alleged SORs via telephone, email or conduct onsite visits to encourage them to cooperate with the CFSI and participate in the CFSP, and assisting SORs with initiating participation in the CFSP.

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

- Provided supplier feedback to improve the response rate as well as improve the accuracy of the smelter identification information; and
- Implemented conflict minerals key performance indicators (KPIs) within Acer's supplier scorecard to minimize risk by driving better due diligence and reporting within the supply chain.

4. Carry out independent third-party audit of smelter/refiner's due diligence practices

- Continued financial support of the CFSP as an active member of the EICC.

5. Report annually on supply chain due diligence

- Published an updated list of known SORs that have been identified in Acer's supply chain as a result of its due diligence measures, which now includes the status of each SOR (see Appendix B); and
- Reported on Acer's supply chain due diligence via this CMR.

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

Acer continues to believe that projects and organizations that seek to boost economic development and help stabilize the Great Lakes Region, as well as develop systems that feed into the CFSI tools and processes are essential. As a result, Acer continues to support the organizations below.

- *ICGLR-OECD-UN Joint Forum on Responsible Mineral Supply Chains* to learn and share experiences with regards to implementing the OECD Guidance and learning more about opportunities to contribute to in-region programs;
- *Public-Private Alliance for Responsible Minerals Trade (PPA)*, an organization whose goal is to award funding for in-region programs that seek to spur economic development and develop minerals tracing systems; and

### **Results of Due Diligence Measures**

As a result of its due diligence measures in 2014, Acer was able to identify 257 unique SORs in its supply chain that it has reason to believe are legitimate SORs. Acer based this decision off of the information received through the consolidation of its supplier survey responses and industry information made available to it through its CFSI membership and working group participation.

For the 2014 reporting year, Acer is providing additional detail regarding the known SORs in its supply chain. Table 1 includes a summary of the progress year-over-year and Table 2 includes individual metal performance for the current reporting year. Both tables include the SOR status

as of April 20, 2015 and clearly show the excellent progress Acer has made as a result of its due diligence efforts.

**Table 1: Progress**

Status*	2013	2014
<b>Compliant</b>	68 (38%)	152 (59%)
<b>Participating</b>	37 (20%)	40 (16%)
<b>Outreach</b>	76 (42%)	65 (25%)
<b>Total</b>	181	257

\*Status is defined as follows:

Compliant: Smelters or refiners that are compliant with the Conflict-Free Smelter Program (CFSP) 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*)

Participating: Smelters and refiners that have committed to undergo a CFSP audit or that are in communication

Outreach: Smelters or refiners that have not agreed to participate, but Acer is assisting with targeted outreach

**Table 2: 2014 Status, by metal**

Metal	Status*		
	Compliant	Participating	Outreach
<b>Tantalum</b>	39	0	0
<b>Tin</b>	35	18	25
<b>Tungsten</b>	14	16	3
<b>Gold</b>	64	6	37
<b>Total</b>	152	40	65

\*Status is defined as follows:

Compliant: Smelters or refiners that are compliant with the Conflict-Free Smelter Program (CFSP) 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*)

Participating: Smelters and refiners that have committed to undergo a CFSP audit or that are in communication


Outreach: Smelters or refiners that have not agreed to participate, but Acer is assisting with targeted outreach

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

- Appendix A – Supply Chain Indicators – additional metrics Acer has identified to track progress within its supply chain.
- Appendix B – Smelter/Refiner List & Countries of Origin – the complete list of SORs that were confirmed to be part of Acer’s supply chain during the 2014 reporting period, including their location and status. The list also includes the known countries of origin for those SORs whose 3TG sourcing origins have been validated by the CFSP.

## **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 working with suppliers to increase the accuracy of SOR identification, support SOR engagement, and drive them to source from SORs with a conflict-free status;
  - Continue to identify and engage true SORs to encourage them to participate in the CFSP, with the goal of obtaining a conflict-free status;
  - Continue supplier audits to evaluate conflict minerals policies and practices within the supply chain downstream from the SORs.
  - Continue to refine conflict minerals due diligence KPIs included in Acer's direct supplier corporate social responsibility scorecard, to prioritize conflict minerals and drive continuous improvement; and
  - Formalize risk management plan and develop internal KPIs to measure performance against the plan.
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## **Appendix A – Supply Chain Indicators**

<b>Indicator</b>	<b>Result</b>
<b>Number of supplier audits conducted</b>	72
<b>Number of suppliers in compliance with Acer's policy or program</b>	63
<b>Percentage of suppliers that have adopted a conflict minerals policy</b>	1. 96% suppliers have a policy in place that includes DRC conflict-free sourcing 2. 81% suppliers have a policy publicly available on their websites.
<b>Suppliers that have required their direct suppliers to source from smelters validated by an independent third party audit</b>	60%
<b>Percentage of validated smelters in the supply chain that are known to not be sourcing from covered countries</b>	39%
<b>Percentage of validated smelters in the supply chain that are known to be sourcing from covered countries</b>	8%
<b>Quantity of smelters that are known to be sourcing from covered countries (Percentage that are validated)</b>	20 (100%)



## Appendix B – Smelter/Refiner List

As part of Acer’s conflict minerals due diligence efforts, we have published a list of the tantalum, tin, tungsten and gold smelters/refiners 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 smelter/refiner, please visit the Conflict-Free Sourcing Initiative website at [www.conflictreesourcinginitiative.org](http://www.conflictreesourcinginitiative.org).

\*Each status is defined as follows:

Compliant: Smelters or refiners that are compliant with the Conflict-Free Smelter Program (CFSP) 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*)

Participating: Smelters and refiners that have committed to undergo a CFSP audit or that are in communication

Outreach: Smelters or refiners that have not agreed to participate, but Acer is assisting with targeted outreach

Metal	Smelter Name	Status*	Country
Gold	Aida Chemical Industries Co. Ltd.	Compliant	JAPAN
Gold	Allgemeine Gold-und Silberscheideanstalt A.G.	Compliant	GERMANY
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	Outreach	UZBEKISTAN
Gold	AngloGold Ashanti Córrego do Sítio Mineração	Compliant	BRAZIL
Gold	Argor-Heraeus SA	Compliant	SWITZERLAND
Gold	Asahi Pretec Corporation	Compliant	JAPAN
Gold	Asaka Riken Co Ltd	Participating	JAPAN
Gold	Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	Compliant	TURKEY
Gold	Aurubis AG	Compliant	GERMANY
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	Outreach	PHILIPPINES
Gold	Bauer Walser AG	Outreach	GERMANY
Gold	Boliden AB	Compliant	SWEDEN
Gold	C. Hafner GmbH + Co. KG	Compliant	GERMANY
Gold	Caridad	Outreach	MEXICO
Gold	CCR Refinery – Glencore Canada Corporation	Compliant	CANADA
Gold	Cendres + Métaux SA	Participating	SWITZERLAND
Gold	Chimet S.p.A.	Compliant	ITALY
Gold	Chugai Mining	Outreach	JAPAN
Gold	Daejin Indus Co. Ltd	Outreach	KOREA, REPUBLIC OF
Gold	Daye Non-Ferrous Metals Mining Ltd.	Outreach	CHINA
Gold	Do Sung Corporation	Outreach	KOREA, REPUBLIC OF
Gold	Doduco	Outreach	GERMANY
Gold	Dowa	Compliant	JAPAN
Gold	Eco-System Recycling Co., Ltd.	Compliant	JAPAN
Gold	FAGGI ENRICO SPA	Outreach	ITALY
Gold	FSE Novosibirsk Refinery	Outreach	RUSSIAN FEDERATION
Gold	Gansu Seemine Material Hi-Tech Co Ltd	Outreach	CHINA
Gold	Geib Refining Corporation	Outreach	UNITED STATES
Gold	Guangdong Jinding Gold Limited	Outreach	CHINA
Gold	Hangzhou Fuchunjiang Smelting Co., Ltd.	Outreach	CHINA
Gold	Heimerle + Meule GmbH	Compliant	GERMANY

<b>Metal</b>	<b>Smelter Name</b>	<b>Status*</b>	<b>Country</b>
Gold	Heraeus Ltd. Hong Kong	Compliant	HONG KONG
Gold	Heraeus Precious Metals GmbH & Co. KG	Compliant	GERMANY
Gold	Hunan Chenzhou Mining Group Co., Ltd.	Outreach	CHINA
Gold	Hwasung CJ Co. Ltd	Outreach	KOREA, REPUBLIC OF
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Company Limited	Outreach	CHINA
Gold	Ishifuku Metal Industry Co., Ltd.	Compliant	JAPAN
Gold	Istanbul Gold Refinery	Compliant	TURKEY
Gold	Japan Mint	Compliant	JAPAN
Gold	Jiangxi Copper Company Limited	Outreach	CHINA
Gold	Johnson Matthey Inc	Compliant	UNITED STATES
Gold	Johnson Matthey Ltd	Compliant	CANADA
Gold	JSC Ekaterinburg Non-Ferrous Metal Processing Plant	Compliant	RUSSIAN FEDERATION
Gold	JSC Uralelectromed	Outreach	RUSSIAN FEDERATION
Gold	JX Nippon Mining & Metals Co., Ltd.	Compliant	JAPAN
Gold	Kazzinc Ltd	Compliant	KAZAKHSTAN
Gold	Kennecott Utah Copper LLC	Compliant	UNITED STATES
Gold	Kojima Chemicals Co., Ltd	Compliant	JAPAN
Gold	Korea Metal Co. Ltd	Outreach	KOREA, REPUBLIC OF
Gold	Kyrgyzaltyn JSC	Outreach	KYRGYZSTAN
Gold	L' azurde Company For Jewelry	Compliant	SAUDI ARABIA
Gold	Lingbao Gold Company Limited	Outreach	CHINA
Gold	Lingbao Jinyuan Tonghui Refinery Co. Ltd.	Outreach	CHINA
Gold	LS-NIKKO Copper Inc.	Compliant	KOREA, REPUBLIC OF
Gold	Luoyang Zijin Yinhui Metal Smelt Co Ltd	Outreach	CHINA
Gold	Materion	Compliant	UNITED STATES
Gold	Matsuda Sangyo Co., Ltd.	Compliant	JAPAN
Gold	Metalor Technologies (Hong Kong) Ltd	Compliant	HONG KONG
Gold	Metalor Technologies (Singapore) Pte. Ltd.	Compliant	SINGAPORE
Gold	Metalor Technologies (Suzhou) Ltd.	Outreach	CHINA
Gold	Metalor Technologies SA	Compliant	SWITZERLAND
Gold	Metalor USA Refining Corporation	Compliant	UNITED STATES
Gold	METALÚRGICA MET-MEX PEÑÓLES, S.A. DE C.V	Compliant	MEXICO
Gold	Mitsubishi Materials Corporation	Compliant	JAPAN
Gold	Mitsui Mining and Smelting Co., Ltd.	Compliant	JAPAN
Gold	Moscow Special Alloys Processing Plant	Outreach	RUSSIAN FEDERATION
Gold	Nadir Metal Rafineri San. Ve Tic. A.Ş.	Compliant	TURKEY
Gold	Navoi Mining and Metallurgical Combinat	Outreach	UZBEKISTAN
Gold	Nihon Material Co. LTD	Compliant	JAPAN
Gold	Ohio Precious Metals, LLC	Compliant	UNITED STATES
Gold	Ohura Precious Metal Industry Co., Ltd	Compliant	JAPAN

<b>Metal</b>	<b>Smelter Name</b>	<b>Status*</b>	<b>Country</b>
Gold	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastvetmet)	Compliant	RUSSIAN FEDERATION
Gold	OJSC Kolyma Refinery	Outreach	RUSSIAN FEDERATION
Gold	PAMP SA	Compliant	SWITZERLAND
Gold	Penglai Penggang Gold Industry Co Ltd	Outreach	CHINA
Gold	Prioksky Plant of Non-Ferrous Metals	Outreach	RUSSIAN FEDERATION
Gold	PT Aneka Tambang (Persero) Tbk	Compliant	INDONESIA
Gold	PX Précinox SA	Compliant	SWITZERLAND
Gold	Rand Refinery (Pty) Ltd	Compliant	SOUTH AFRICA
Gold	Royal Canadian Mint	Compliant	CANADA
Gold	Sabin Metal Corp.	Participating	UNITED STATES
Gold	SAMWON METALS Corp.	Outreach	KOREA, REPUBLIC OF
Gold	Schone Edelmetaal	Compliant	NETHERLANDS
Gold	SEMPSA Joyería Platería SA	Compliant	SPAIN
Gold	Shandong Tiancheng Biological Gold Industrial Co., Ltd.	Outreach	CHINA
Gold	Shandong Zhaojin Gold & Silver Refinery Co. Ltd	Compliant	CHINA
Gold	So Accurate Group, Inc.	Outreach	UNITED STATES
Gold	SOE Shyolkovsky Factory of Secondary Precious Metals	Participating	RUSSIAN FEDERATION
Gold	Solar Applied Materials Technology Corp.	Compliant	TAIWAN
Gold	Sumitomo Metal Mining Co., Ltd.	Compliant	JAPAN
Gold	Tanaka Kikinzoku Kogyo K.K.	Compliant	JAPAN
Gold	The Great Wall Gold and Silver Refinery of China	Outreach	CHINA
Gold	The Refinery of Shandong Gold Mining Co. Ltd	Compliant	CHINA
Gold	Tokuriki Honten Co., Ltd	Compliant	JAPAN
Gold	Tongling nonferrous Metals Group Co.,Ltd	Outreach	CHINA
Gold	Torecom	Participating	KOREA, REPUBLIC OF
Gold	Umicore Brasil Ltda	Compliant	BRAZIL
Gold	Umicore Precious Metals Thailand	Compliant	THAILAND
Gold	Umicore SA Business Unit Precious Metals Refining	Compliant	BELGIUM
Gold	United Precious Metal Refining, Inc.	Compliant	UNITED STATES
Gold	Valcambi SA	Compliant	SWITZERLAND
Gold	Western Australian Mint trading as The Perth Mint	Compliant	AUSTRALIA
Gold	YAMAMOTO PRECIOUS METAL CO., LTD.	Compliant	JAPAN
Gold	Yokohama Metal Co Ltd	Participating	JAPAN
Gold	Yunnan Copper Industry Co Ltd	Outreach	CHINA
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	Compliant	CHINA
Gold	Zijin Mining Group Co. Ltd	Compliant	CHINA
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	Compliant	CHINA
Tantalum	Conghua Tantalum and Niobium Smeltry	Compliant	CHINA
Tantalum	Duoluoshan	Compliant	CHINA
Tantalum	Exotech Inc.	Compliant	UNITED STATES

<b>Metal</b>	<b>Smelter Name</b>	<b>Status*</b>	<b>Country</b>
Tantalum	F&X Electro-Materials Ltd.	Compliant	CHINA
Tantalum	Global Advanced Metals Aizu	Compliant	UNITED STATES
Tantalum	Global Advanced Metals Boyertown	Compliant	UNITED STATES
Tantalum	Guangdong Zhiyuan New Material Co., Ltd.	Compliant	CHINA
Tantalum	Guizhou Zhenhua Xinyun Technology Ltd., Kaili branch	Compliant	CHINA
Tantalum	H.C. Starck Co., Ltd.	Compliant	THAILAND
Tantalum	H.C. Starck GmbH Goslar	Compliant	GERMANY
Tantalum	H.C. Starck GmbH Laufenburg	Compliant	GERMANY
Tantalum	H.C. Starck Hermsdorf GmbH	Compliant	GERMANY
Tantalum	H.C. Starck Inc.	Compliant	UNITED STATES
Tantalum	H.C. Starck Ltd.	Compliant	JAPAN
Tantalum	H.C. Starck Smelting GmbH & Co.KG	Compliant	GERMANY
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	Compliant	CHINA
Tantalum	Hi-Temp Specialty Metals, Inc.	Compliant	UNITED STATES
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	Compliant	CHINA
Tantalum	Jiujiang Tanbre Co., Ltd.	Compliant	CHINA
Tantalum	KEMET Blue Metals	Compliant	MEXICO
Tantalum	KEMET Blue Powder	Compliant	UNITED STATES
Tantalum	King-Tan Tantalum Industry Ltd	Compliant	CHINA
Tantalum	LSM Brasil S.A.	Compliant	BRAZIL
Tantalum	Metallurgical Products India (Pvt.) Ltd.	Compliant	INDIA
Tantalum	Mineração Taboca S.A.	Compliant	BRAZIL
Tantalum	Mitsui Mining & Smelting	Compliant	JAPAN
Tantalum	Molycorp Silmet A.S.	Compliant	ESTONIA
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	Compliant	CHINA
Tantalum	Plansee SE Liezen	Compliant	AUSTRIA
Tantalum	Plansee SE Reutte	Compliant	AUSTRIA
Tantalum	QuantumClean	Compliant	UNITED STATES
Tantalum	RFH Tantalum Smeltry Co., Ltd	Compliant	CHINA
Tantalum	Solikamsk Magnesium Works OAO	Compliant	RUSSIAN FEDERATION
Tantalum	Taki Chemicals	Compliant	JAPAN
Tantalum	Telex	Compliant	UNITED STATES
Tantalum	Ulba	Compliant	KAZAKHSTAN
Tantalum	Yichun Jin Yang Rare Metal Co., Ltd	Compliant	CHINA
Tantalum	Zhuzhou Cement Carbide	Compliant	CHINA
Tin	Alpha	Compliant	UNITED STATES
Tin	China Tin Group Co., Ltd.	Participating	CHINA
Tin	CNMC (Guangxi) PGMA Co. Ltd.	Outreach	CHINA
Tin	Cooper Santa	Participating	BRAZIL
Tin	CV Gita Pesona	Participating	INDONESIA
Tin	CV Makmur Jaya	Outreach	INDONESIA

<b>Metal</b>	<b>Smelter Name</b>	<b>Status*</b>	<b>Country</b>
Tin	CV Serumpun Sebalai	Participating	INDONESIA
Tin	CV United Smelting	Compliant	INDONESIA
Tin	Dowa	Compliant	JAPAN
Tin	EM Vinto	Compliant	BOLIVIA
Tin	Estanho de Rondônia S.A.	Outreach	BRAZIL
Tin	Feinhütte Halsbrücke GmbH	Outreach	GERMANY
Tin	Fenix Metals	Participating	POLAND
Tin	Gejiu Kai Meng Industry and Trade LLC	Outreach	CHINA
Tin	Gejiu Non-Ferrous Metal Processing Co. Ltd.	Compliant	CHINA
Tin	Gejiu Zi-Li	Outreach	CHINA
Tin	Huichang Jinshunda Tin Co. Ltd	Outreach	CHINA
Tin	Jiangxi Ketai Advanced Material Co., Ltd.	Compliant	CHINA
Tin	Linwu Xianggui Smelter Co	Outreach	CHINA
Tin	Magnu's Minerais Metais e Ligas LTDA	Compliant	BRAZIL
Tin	Malaysia Smelting Corporation (MSC)	Compliant	MALAYSIA
Tin	Melt Metais e Ligas S/A	Compliant	BRAZIL
Tin	Metallic Resources Inc	Outreach	USA
Tin	Metallo Chimique	Compliant	BELGIUM
Tin	Mineração Taboca S.A.	Compliant	BRAZIL
Tin	Minsur	Compliant	PERU
Tin	Mitsubishi Materials Corporation	Compliant	JAPAN
Tin	Nankang Nanshan Tin Manufactory Co., Ltd	Outreach	CHINA
Tin	Nghe Tinh Non-Ferrous Metals Joint Stock Company	Participating	VIETNAM
Tin	Novosibirsk Integrated Tin Works	Outreach	RUSSIAN FEDERATION
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	Participating	THAILAND
Tin	O.M. Manufacturing Philippines, Inc.	Participating	PHILIPPINES
Tin	Operaciones Metalurgical S.A.	Compliant	BOLIVIA
Tin	PT Alam Lestari Kencana	Outreach	INDONESIA
Tin	PT Aries Kencana Sejahtera	Participating	INDONESIA
Tin	PT Artha Cipta Langgeng	Compliant	INDONESIA
Tin	PT ATD Makmur Mandiri Jaya	Compliant	INDONESIA
Tin	PT Babel Inti Perkasa	Compliant	INDONESIA
Tin	PT Babel Surya Alam Lestari	Outreach	INDONESIA
Tin	PT Bangka Kudai Tin	Outreach	INDONESIA
Tin	PT Bangka Putra Karya	Compliant	INDONESIA
Tin	PT Bangka Timah Utama Sejahtera	Outreach	INDONESIA
Tin	PT Bangka Tin Industry	Compliant	INDONESIA
Tin	PT Belitung Industri Sejahtera	Compliant	INDONESIA
Tin	PT BilliTin Makmur Lestari	Participating	INDONESIA
Tin	PT Bukit Timah	Compliant	INDONESIA
Tin	PT DS Jaya Abadi	Compliant	INDONESIA

<b>Metal</b>	<b>Smelter Name</b>	<b>Status*</b>	<b>Country</b>
Tin	PT Eunindo Usaha Mandiri	Compliant	INDONESIA
Tin	PT Fang Di MulTindo	Outreach	INDONESIA
Tin	PT HANJAYA PERKASA METALS	Outreach	INDONESIA
Tin	PT HP Metals Indonesia	Outreach	INDONESIA
Tin	PT Inti Stania Prima	Participating	INDONESIA
Tin	PT JusTindo	Participating	INDONESIA
Tin	PT Karimun Mining	Participating	INDONESIA
Tin	PT Koba Tin	Outreach	INDONESIA
Tin	PT Mitra Stania Prima	Compliant	INDONESIA
Tin	PT Panca Mega Persada	Compliant	INDONESIA
Tin	PT Pelat Timah Nusantara Tbk	Outreach	INDONESIA
Tin	PT Prima Timah Utama	Compliant	INDONESIA
Tin	PT REFINED BANGKA TIN	Compliant	INDONESIA
Tin	PT Sariwiguna Binasentosa	Compliant	INDONESIA
Tin	PT Seirama Tin investment	Outreach	INDONESIA
Tin	PT Stanindo Inti Perkasa	Compliant	INDONESIA
Tin	PT Sumber Jaya Indah	Participating	INDONESIA
Tin	PT Supra Sukses Trinusa	Outreach	INDONESIA
Tin	PT Tambang Timah	Compliant	INDONESIA
Tin	PT Timah (Persero), Tbk	Compliant	INDONESIA
Tin	PT Tinindo Inter Nusa	Compliant	INDONESIA
Tin	PT Tommy Utama	Outreach	INDONESIA
Tin	PT Yinchendo Mining Industry	Outreach	INDONESIA
Tin	Rui Da Hung	Participating	TAIWAN
Tin	Soft Metais, Ltda.	Participating	BRAZIL
Tin	Thaisarco	Compliant	THAILAND
Tin	The Gejiu cloud new colored electrolytic	Outreach	CHINA
Tin	VQB Mineral and Trading Group JSC	Participating	VIETNAM
Tin	White Solder Metalurgia e Mineração Ltda.	Compliant	BRAZIL
Tin	Yunnan Chengfeng Non-ferrous Metals Co.,Ltd.	Participating	CHINA
Tin	Yunnan Tin Company, Ltd.	Compliant	CHINA
Tungsten	A.L.M.T. TUNGSTEN Corp.	Participating	JAPAN
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.	Compliant	CHINA
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	Participating	CHINA
Tungsten	Dayu Weiliang Tungsten Co., Ltd.	Participating	CHINA
Tungsten	Fujian Jinxin Tungsten Co., Ltd.	Compliant	CHINA
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	Compliant	CHINA
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	Compliant	CHINA
Tungsten	Ganzhou Non-ferrous Metals Smelting Co., Ltd.	Participating	CHINA
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	Compliant	CHINA
Tungsten	Global Tungsten & Powders Corp.	Compliant	UNITED STATES

<b>Metal</b>	<b>Smelter Name</b>	<b>Status*</b>	<b>Country</b>
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	Participating	CHINA
Tungsten	H.C. Starck GmbH	Participating	GERMANY
Tungsten	H.C. Starck Smelting GmbH & Co.KG	Participating	GERMANY
Tungsten	Hunan Chenzhou Mining Group Co., Ltd.	Outreach	CHINA
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.	Compliant	CHINA
Tungsten	Japan New Metals Co., Ltd.	Compliant	JAPAN
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	Participating	CHINA
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	Compliant	CHINA
Tungsten	Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.	Outreach	CHINA
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	Participating	CHINA
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	Participating	CHINA
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	Participating	CHINA
Tungsten	JSC Pobedit	Participating	RUSSIAN FEDERATION
Tungsten	Kennametal Fallon	Participating	UNITED STATES
Tungsten	Kennametal Huntsville	Participating	UNITED STATES
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	Compliant	CHINA
Tungsten	Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC	Participating	VIETNAM
Tungsten	Tejing (Vietnam) Tungsten Co., Ltd.	Outreach	VIETNAM
Tungsten	Vietnam Youngsun Tungsten Industry Co., Ltd	Compliant	VIETNAM
Tungsten	Wolfram Bergbau und Hütten AG	Compliant	AUSTRIA
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	Compliant	CHINA
Tungsten	Xiamen Tungsten Co., Ltd.	Compliant	CHINA
Tungsten	Xinhai Rendan Shaoguan Tungsten Co., Ltd.	Participating	CHINA

Countries of origin for the minerals processed by these smelters may include:

Angola, Argentina, Australia, Austria, Belgium, Bolivia, Brazil, Burundi, Canada, Central African Republic, Chile, China, Colombia, Côte D'Ivoire, Czech Republic, Democratic Republic of Congo, Djibouti, Egypt, Estonia, Ethiopia, France, Germany, Guyana, Hungary, India, Indonesia, Ireland, Israel, Japan, Kazakhstan, Kenya, Laos, Luxembourg, Madagascar, Malaysia, Mongolia, Mozambique, Myanmar, Namibia, Netherlands, Nigeria, Peru, Portugal, Republic of Congo, Russia, Rwanda, Sierra Leone, Singapore, Slovakia, South Africa, South Korea, South Sudan, Spain, Suriname, Switzerland, Taiwan, Tanzania, Uganda, United Kingdom, United States, Vietnam, Zambia, Zimbabwe