



## ACER INCORPORATED 2017 RESPONSIBLE MINERALS REPORT

### **Introduction**

Acer has developed this Responsible Minerals Report (RMR), covering the period from January 1 to December 31 of 2017, 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, Acer began investigating potential due diligence practices to address other priority minerals in Acer’s supply chain that have been determined to originate from Conflict-Affected and High-Risk Areas (CAHRA). These include the cobalt supply chain as well as tin sourced from Indonesia (priority minerals). The efforts associated with developing these due diligence practices are also described in this report.

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 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, today Acer is one of the world’s top ICT companies and has a presence in over 160 countries. As Acer looks into the future, it is focused on enabling a world where hardware, software and services will infuse with one another to open up new possibilities for consumers and businesses alike. From service-oriented technologies to the Internet of Things to gaming and virtual reality, Acer’s 7,000+ employees are dedicated to the research, design, marketing, sale, and support of products and solutions that break barriers between people and technology. Please visit [www.acer.com](http://www.acer.com) for more information.

### **Reasonable Country of Origin Inquiry (RCOI)**

For Conflict Minerals, 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 Responsible Minerals Initiative (RMI), formerly 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 RMI 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 RMI and those that have had their mines of origin verified by the Responsible Minerals Assurance Process (RMAP), formerly the Conflict-Free Smelter program (CFSP).

When country of origin is unable to be determined from the CMRT or validated by the RMAP, Acer turns to other forms of due diligence to conduct its RCOI. This includes direct contact with the SORs, review of audit reports from supply chain validation programs similar to the RMAP, or review of outreach efforts by industry-led programs, such as the RMI. In 2017, Acer was able to identify 298 SORs in its supply chain. Out of 298 total SORs, 248 were validated by the RMAP. Of the remaining 50 SORs, Acer was able to determine the country of origin for 20, leaving 30 that remain unknown.

Due to the results of its RCOI, Acer has reason to believe that in some cases, its necessary 3TG may have originated in the DRC or Covered Countries 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 RMR.

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

Acer developed and implemented a responsible minerals due diligence program to help protect human rights and to avoid contributing to conflict in the DRC or Covered Countries as a result of its decision when sourcing the necessary 3TG for the manufacture of its products. In 2017, Acer began the process to expand the program to address child labor in the DRC related to cobalt mining and the environmental impacts and safety concerns of tin mining in Indonesia. We are still actively in the middle of this program transition as new processes, tools, verification programs are being developed and piloted. 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 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.

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 controls and transparency over 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;  
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 responsible minerals due diligence program;
- Revised Acer's conflict minerals policy and internal procedures to broaden the scope of Acer's due diligence program to include a focus on other priority minerals that may have originated from CAHRAs. The revised documents, now titled Responsible Minerals Policy and Responsible Minerals Procedure, were necessary to ensure continued relevancy as the program continues to become more progressive (policy [available on Acer's sustainability website](#));
- 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;
- Continued to review the RMI Grievance and Complaints Mechanism results to be informed of the issues and the steps taken to address the matters, as well as identify any issues where Acer may directly support; and
- Through the annual supplier CSR communication meeting, Acer provided follow-up training on its responsible minerals policy, procedure 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 sixth conflict minerals survey, requesting information on Acer's supply chain using the CMRT and received 100% direct supplier response rate. Acer will continue to build capacity with these suppliers to ensure a response during the

next survey round. We increased the response rate from 95% to 98% in 2017. For the suppliers that did not respond, we deducted points from their 2017 CSR scorecard to guide them to take actions to complete the CMRT;

- Contributed to the development and initial pilot of the RMI Cobalt Reporting Template (CRT) and identified an initial list of the cobalt refiners in Acer's supply chain;
- Consolidated the supplier survey responses and compared the results with the RMI known SOR lists and the RMAP to verify true SORs, mines of origin, and to determine the conflict-free status for 3TG;
- 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. Acer identified two suppliers via audits that one did not have evidence of a conflict minerals policy and the other did not have due diligence procedures in place. Acer worked with the suppliers to establish conflict minerals policies and due diligence procedures to identify 3TG smelters and eliminate conflict SORs from the supply chain. Acer continues to monitor, audit and measure the due diligence performance of our direct suppliers.
- Continued conducting research on alleged SORs, identifying SOR alias names and relating them to alleged or true SORs, contacting them via telephone and/or email to verify them as true SORs and to encourage them to cooperate with the RMI and participate in the RMAP, and assisting SORs with initiating participation in the RMAP; and
- Continued to direct suppliers to cease sourcing materials from high-risk SORs that choose not to participate in the RMAP.
- Acer began 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. At the time of the writing of this report, Acer has connections with 86 smelters and has received 81 RRAs.

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

- Continued our supplier feedback process, which includes specific line-by-line status of each SOR identified by our suppliers asking them to review and engage with whom we identified for “Outreach” as part of Acer’s conflict minerals due diligence process;
- Continued to measure conflict minerals key performance indicators (KPIs) within Acer’s supplier CSR scorecard to minimize risk by driving better due diligence and reporting within the supply chain. Acer saw an improvement of the scores for “good “category, on average, from 9.2 to 9.3. A summary of the results of our supplier CSR scorecards is provided in Table 1 below; and

**Table 1: CSR Scorecard Results**

Score Category	Score	Suppliers
Needs improvement immediately	<7	0%
Needs Improvement	7-8	12%
Good	9-10	88%

- Updated Acer’s risk management plan to begin the broadening of the scope to include other priority minerals and to maintain consistency with the types of risks identified through Acer’s due diligence program. The plan includes a list of conditions which constitute high risk conditions for Acer, recommended mitigation actions and KPIs, where applicable, to measure progress.
- Continued reviewing the RMI’s Grievance & Complaints Mechanism report to identify potential issues that may exist in Acer’s supply chain and to support mitigation where applicable.
- On April 6, 2018, at the time of the writing of this RMR, the US Government designated seven Russian oligarchs and 12 companies they own or control, 17 senior Russian government officials, and a state-owned Russian weapons trading company and its subsidiary, a Russian bank. The individual Viktor Vekselberg and company RENOVA GROUP was designated on the Specially Designated Nationals and Blocked Persons list (SDN list) and was subjected to sanctions by the US Government. The Renova Group is in direct control of the gold refiners JSC Ekaterinburg Non-Ferrous Metal Processing Plant (CID000927) and Safina A.S. (CID002290). As a result, the refiners were removed from the RMI’s Conformant List. Immediately following this designation, Acer requested that all suppliers

immediately cease all business with these refiners, in the manufacture of Acer products.

4. Carry out independent third-party audit of smelter/refiner's due diligence practices
  - Continued financial support of the RMAP as an active member of the RBA.
5. Report annually on supply chain due diligence
  - Published an updated list of known SORs, which now include cobalt refiners, that have been identified in Acer's supply chain as a result of its due diligence measures, along with a status of each SOR (see Appendix B); and
  - 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 CFSI 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.

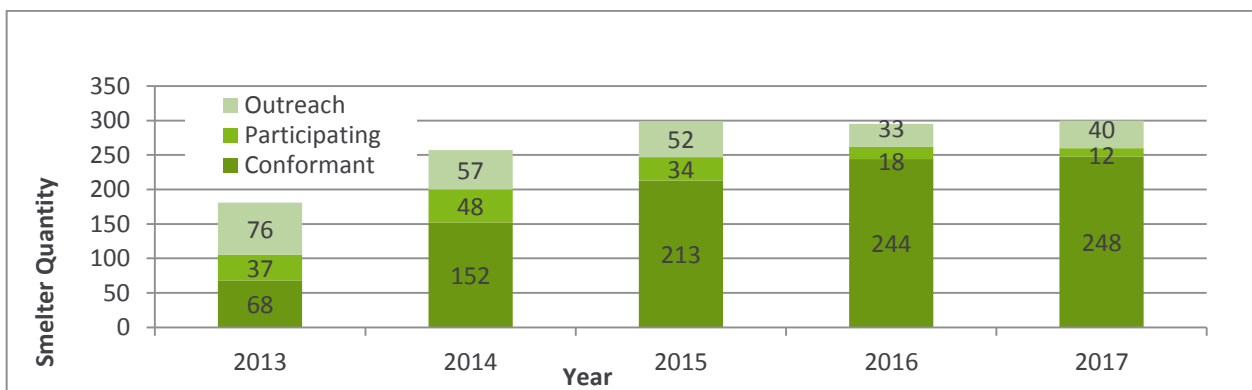
- Monitors the activities of the *ICGLR-OECD-UN Joint Forum on Responsible Mineral Supply Chains* to learn about experiences with regards to implementing the OECD Guidance and opportunities to contribute to in-region programs; and
- Contributes funding and participates as a member of the *Public-Private 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

## **Results of Due Diligence Measures**

As a result of its due diligence measures in 2017, Acer was able to identify 298 unique 3TG and 2 cobalt 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 RMI membership and working group participation.

For the 2017 reporting year, Acer is also providing an update to its progress year-over-year (Figure 1) and individual metal performance for the current reporting year (Figure 2). Both charts include the SOR status as of April 23, 2018 and clearly show the excellent progress Acer has made as a result of its due diligence efforts.

**Figure 1: Progress**



\*Status is defined as follows:

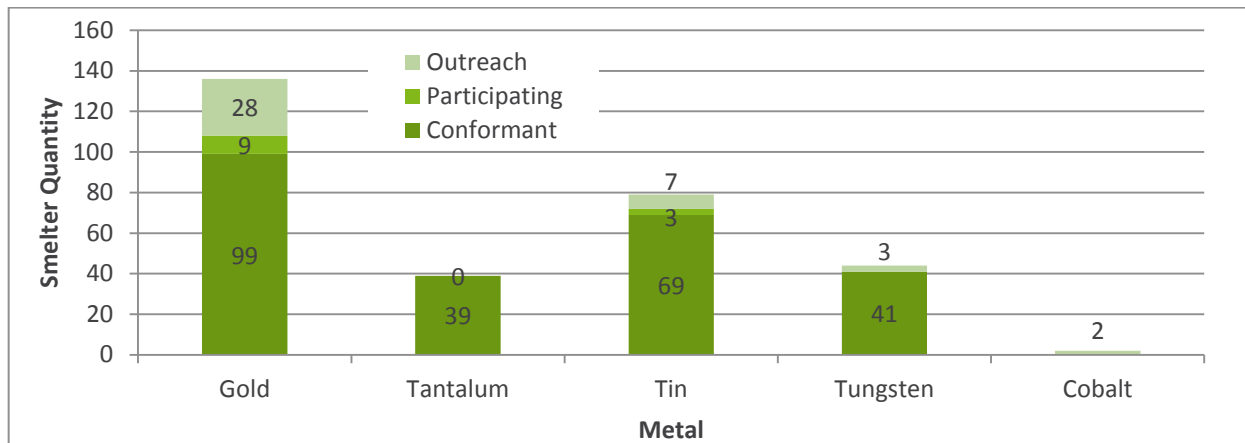
**Conformant:** Smelters or refiners that are compliant with the Responsible Minerals Assurance Process (RMAP) assessment protocols or have been validated by a similar validation program (e.g., the London Bullion Market Association's *Responsible Gold Programme* or the Responsible Jewelry Council's *Chain-of-Custody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

**Participating:** Smelters and refiners that have committed to undergo an RMAP audit or that are in communication

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



**Figure 2: 2017 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 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 an RMAP 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 RMR 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 3TG 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 2017 reporting period, including their location and status. The list also includes the known countries of origin for those SORs whose mineral sourcing origins have been validated by the RMAP.

While experiencing success, we have also begun to realize the challenge associated with the smelters that have yet to cooperate and those that have participated in the past, but may waiver on participation in the future. The supply chain is very dynamic and due diligence is an ongoing process that if working properly will continue to identify risks and opportunities for mitigation. It has become apparent to Acer, that a quantitative goal of 100% conformant smelters is a moving target and is not the right measure of success for our program. Alternatively, a qualitative measure of the ability of our due diligence process to identify and respond to risks is preferred and will be implemented going forward.

Acer will always reach toward the goal of having 100% of smelters engaged in the RMAP, either compliant or participating in the process with the goal of becoming compliant. However, due to the dynamic nature of our supply chain and the existence of a due diligence process that identifies risk mitigation opportunities, it is realistic to assume that there may always be a number of smelters that require outreach or are in the process of being added or removed from the supply chain. In 2018, we will set the target that 90% of smelters are RMAP compliant and 95% are either RMAP compliant or participating. This allows for a small quantity of smelters to be in the risk mitigation or transition phase, which is a more realistic assessment of the supply chain characteristics.

### **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 supplier audits to evaluate responsible minerals policies and practices within the supply chain downstream from the SORs; and
- 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

## **Appendix A – Supply Chain Indicators**

<b>Indicator</b>	<b>Result</b>			
	2014	2015	2016	2017
<b>Number of supplier audits conducted</b>	72	71	70	71
<b>Number of suppliers in compliance with Acer's policy or program</b>	63	65	66	69
<b>Percentage of suppliers that have adopted a conflict minerals policy</b>	96%	97%	98%	100%
<b>- Policy is publically available on supplier's website</b>	81%	78%	84%	86%
<b>Suppliers that have required their direct suppliers to source from smelters validated by an independent third party audit</b>	60%	100%	100%	100%
<b>Percentage of validated smelters in the supply chain that are known to not be sourcing from covered countries</b>	39%	52%	60%	56%
<b>Percentage of validated smelters in the supply chain that are known to be sourcing from covered countries</b>	8%	11%	18%	13%
<b>Quantity of smelters that are known to be sourcing from covered countries (Percentage that are validated)</b>	20 (100%)	23 (100%)	43 (100%)	40 (100%)

## Appendix B – Smelter/Refiner List

As part of Acer’s responsible minerals due diligence efforts, we have published a list of the tantalum, tin, tungsten, gold and cobalt 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 Responsible Minerals Initiative website at [www.responsiblemineralsinitiative.org](http://www.responsiblemineralsinitiative.org)

\*Each 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 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 an RMAP audit or that are in communication

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

<b>Metal</b>	<b>Smelter Name</b>	<b>Status*</b>	<b>Country</b>
Gold	Abington Reldan Metals, LLC	Outreach	UNITED STATES OF AMERICA
Gold	Advanced Chemical Company	Conformant	UNITED STATES OF AMERICA
Gold	Aida Chemical Industries Co., Ltd.	Conformant	JAPAN
Gold	Al Etihad Gold LLC	Conformant	UNITED ARAB EMIRATES
Gold	Allgemeine Gold-und Silberscheideanstalt A.G.	Conformant	GERMANY
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	Conformant	UZBEKISTAN
Gold	AngloGold Ashanti Corrego do Sitio Mineracao	Conformant	BRAZIL
Gold	Argor-Heraeus S.A.	Conformant	SWITZERLAND
Gold	Asahi Pretec Corp.	Conformant	JAPAN
Gold	Asahi Refining Canada Ltd.	Conformant	CANADA
Gold	Asahi Refining USA Inc.	Conformant	UNITED STATES OF AMERICA
Gold	Asaka Riken Co., Ltd.	Conformant	JAPAN
Gold	Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	Outreach	TURKEY
Gold	AU Traders and Refiners	Conformant	SOUTH AFRICA
Gold	Aurubis AG	Conformant	GERMANY
Gold	Bangalore Refinery	Participating	INDIA
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	Conformant	PHILIPPINES
Gold	Boliden AB	Conformant	SWEDEN
Gold	C. Hafner GmbH + Co. KG	Conformant	GERMANY

<b>Metal</b>	<b>Smelter Name</b>	<b>Status*</b>	<b>Country</b>
Gold	Caridad	Outreach	MEXICO
Gold	CCR Refinery - Glencore Canada Corporation	Conformant	CANADA
Gold	Cendres + Metaux S.A.	Conformant	SWITZERLAND
Gold	Chimet S.p.A.	Conformant	ITALY
Gold	Chugai Mining	Participating	JAPAN
Gold	Daejin Indus Co., Ltd.	Conformant	KOREA, REPUBLIC OF
Gold	Daye Non-Ferrous Metals Mining Ltd.	Participating	CHINA
Gold	Degussa Sonne / Mond Goldhandel GmbH	Outreach	GERMANY
Gold	DODUCO Contacts and Refining GmbH	Conformant	GERMANY
Gold	Dowa	Conformant	JAPAN
Gold	DSC (Do Sung Corporation)	Conformant	KOREA, REPUBLIC OF
Gold	Eco-System Recycling Co., Ltd.	Conformant	JAPAN
Gold	Elemental Refining, LLC	Outreach	UNITED STATES OF AMERICA
Gold	Emirates Gold DMCC	Conformant	UNITED ARAB EMIRATES
Gold	GCC Gujrat Gold Centre Pvt. Ltd.	Outreach	INDIA
Gold	Geib Refining Corporation	Conformant	UNITED STATES OF AMERICA
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	Conformant	CHINA
Gold	Great Wall Precious Metals Co., Ltd. of CBPM	Outreach	CHINA
Gold	Guangdong Jinding Gold Limited	Outreach	CHINA
Gold	Guoda Safina High-Tech Environmental Refinery Co., Ltd.	Outreach	CHINA
Gold	Hangzhou Fuchunjiang Smelting Co., Ltd.	Outreach	CHINA
Gold	HeeSung Metal Ltd.	Conformant	KOREA, REPUBLIC OF
Gold	Heimerle + Meule GmbH	Conformant	GERMANY
Gold	Heraeus Metals Hong Kong Ltd.	Conformant	CHINA
Gold	Heraeus Precious Metals GmbH & Co. KG	Conformant	GERMANY

<b>Metal</b>	<b>Smelter Name</b>	<b>Status*</b>	<b>Country</b>
Gold	Hunan Chenzhou Mining Co., Ltd.	Outreach	CHINA
Gold	HwaSeong CJ CO., LTD.	Outreach	KOREA, REPUBLIC OF
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	Conformant	CHINA
Gold	Ishifuku Metal Industry Co., Ltd.	Conformant	JAPAN
Gold	Istanbul Gold Refinery	Conformant	TURKEY
Gold	Italpreziosi	Conformant	ITALY
Gold	Japan Mint	Conformant	JAPAN
Gold	Jiangxi Copper Co., Ltd.	Conformant	CHINA
Gold	JSC Ekaterinburg Non-Ferrous Metal Processing Plant	Conformant	RUSSIAN FEDERATION
Gold	JSC Uralelectromed	Conformant	RUSSIAN FEDERATION
Gold	JX Nippon Mining & Metals Co., Ltd.	Conformant	JAPAN
Gold	Kazakhmys Smelting LLC	Participating	KAZAKHSTAN
Gold	Kazzinc	Conformant	KAZAKHSTAN
Gold	Kennecott Utah Copper LLC	Conformant	UNITED STATES OF AMERICA
Gold	KGHM Polska Miedz Spolka Akcyjna	Participating	POLAND
Gold	Kojima Chemicals Co., Ltd.	Conformant	JAPAN
Gold	Korea Zinc Co., Ltd.	Conformant	KOREA, REPUBLIC OF
Gold	Kyrgyzaltyn JSC	Conformant	KYRGYZSTAN
Gold	Lingbao Gold Co., Ltd.	Outreach	CHINA
Gold	Lingbao Jinyuan Tonghui Refinery Co., Ltd.	Outreach	CHINA
Gold	L'Orfebre S.A.	Participating	ANDORRA
Gold	LS-NIKKO Copper Inc.	Conformant	KOREA, REPUBLIC OF
Gold	Luoyang Zijin Yinhui Gold Refinery Co., Ltd.	Outreach	CHINA
Gold	Marsam Metals	Conformant	BRAZIL
Gold	Materion	Conformant	UNITED STATES OF AMERICA

<b>Metal</b>	<b>Smelter Name</b>	<b>Status*</b>	<b>Country</b>
Gold	Matsuda Sangyo Co., Ltd.	Conformant	JAPAN
Gold	Metalor Technologies (Hong Kong) Ltd.	Conformant	CHINA
Gold	Metalor Technologies (Singapore) Pte., Ltd.	Conformant	SINGAPORE
Gold	Metalor Technologies (Suzhou) Ltd.	Conformant	CHINA
Gold	Metalor Technologies S.A.	Conformant	SWITZERLAND
Gold	Metalor USA Refining Corporation	Conformant	UNITED STATES OF AMERICA
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	Conformant	MEXICO
Gold	Mitsubishi Materials Corporation	Conformant	JAPAN
Gold	Mitsui Mining and Smelting Co., Ltd.	Conformant	JAPAN
Gold	MMTC-PAMP India Pvt., Ltd.	Conformant	INDIA
Gold	Modeltech Sdn Bhd	Participating	MALAYSIA
Gold	Morris and Watson	Outreach	NEW ZEALAND
Gold	Morris and Watson Gold Coast	Outreach	AUSTRALIA
Gold	Moscow Special Alloys Processing Plant	Conformant	RUSSIAN FEDERATION
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	Conformant	TURKEY
Gold	Navoi Mining and Metallurgical Combinat	Outreach	UZBEKISTAN
Gold	Nihon Material Co., Ltd.	Conformant	JAPAN
Gold	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	Conformant	AUSTRIA
Gold	Ohura Precious Metal Industry Co., Ltd.	Conformant	JAPAN
Gold	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	Conformant	RUSSIAN FEDERATION
Gold	OJSC Novosibirsk Refinery	Conformant	RUSSIAN FEDERATION
Gold	PAMP S.A.	Conformant	SWITZERLAND
Gold	Penglai Penggang Gold Industry Co., Ltd.	Outreach	CHINA
Gold	Prioksky Plant of Non-Ferrous Metals	Conformant	RUSSIAN FEDERATION
Gold	PT Aneka Tambang (Persero) Tbk	Conformant	INDONESIA

<b>Metal</b>	<b>Smelter Name</b>	<b>Status*</b>	<b>Country</b>
Gold	PX Precinox S.A.	Conformant	SWITZERLAND
Gold	Rand Refinery (Pty) Ltd.	Conformant	SOUTH AFRICA
Gold	Refinery of Seemine Gold Co., Ltd.	Outreach	CHINA
Gold	Remondis Argentia B.V.	Participating	NETHERLANDS
Gold	Republic Metals Corporation	Conformant	UNITED STATES OF AMERICA
Gold	Royal Canadian Mint	Conformant	CANADA
Gold	SAAMP	Conformant	FRANCE
Gold	Sabin Metal Corp.	Outreach	UNITED STATES OF AMERICA
Gold	SAFINA A.S.	Participating	CZECH REPUBLIC
Gold	Sai Refinery	Outreach	INDIA
Gold	Samduck Precious Metals	Conformant	KOREA, REPUBLIC OF
Gold	Samwon Metals Corp.	Outreach	KOREA, REPUBLIC OF
Gold	SAXONIA Edelmetalle GmbH	Conformant	GERMANY
Gold	Schone Edelmetaal B.V.	Conformant	NETHERLANDS
Gold	SEMPA Joyeria Plateria S.A.	Conformant	SPAIN
Gold	Shandong Tiancheng Biological Gold Industrial Co., Ltd.	Outreach	CHINA
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	Conformant	CHINA
Gold	Sichuan Tianze Precious Metals Co., Ltd.	Conformant	CHINA
Gold	Singway Technology Co., Ltd.	Conformant	TAIWAN
Gold	SOE Shyolkovsky Factory of Secondary Precious Metals	Conformant	RUSSIAN FEDERATION
Gold	Solar Applied Materials Technology Corp.	Conformant	TAIWAN
Gold	Sudan Gold Refinery	Outreach	SUDAN
Gold	Sumitomo Metal Mining Co., Ltd.	Conformant	JAPAN
Gold	SungEel HiMetal Co., Ltd.	Conformant	KOREA, REPUBLIC OF
Gold	T.C.A S.p.A	Conformant	ITALY



<b>Metal</b>	<b>Smelter Name</b>	<b>Status*</b>	<b>Country</b>
Gold	Tanaka Kikinzoku Kogyo K.K.	Conformant	JAPAN
Gold	The Refinery of Shandong Gold Mining Co., Ltd.	Conformant	CHINA
Gold	Tokuriki Honten Co., Ltd.	Conformant	JAPAN
Gold	Tongling Nonferrous Metals Group Co., Ltd.	Outreach	CHINA
Gold	Tony Goetz NV	Outreach	BELGIUM
Gold	Torecom	Conformant	KOREA, REPUBLIC OF
Gold	Umicore Brasil Ltda.	Conformant	BRAZIL
Gold	Umicore Precious Metals Thailand	Conformant	THAILAND
Gold	Umicore S.A. Business Unit Precious Metals Refining	Conformant	BELGIUM
Gold	United Precious Metal Refining, Inc.	Conformant	UNITED STATES OF AMERICA
Gold	Valcambi S.A.	Conformant	SWITZERLAND
Gold	Western Australian Mint (T/a The Perth Mint)	Conformant	AUSTRALIA
Gold	WIELAND Edelmetalle GmbH	Conformant	GERMANY
Gold	Yamakin Co., Ltd.	Conformant	JAPAN
Gold	Yokohama Metal Co., Ltd.	Conformant	JAPAN
Gold	Yunnan Copper Industry Co., Ltd.	Outreach	CHINA
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	Conformant	CHINA
Tantalum	Asaka Riken Co., Ltd.	Conformant	JAPAN
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	Conformant	CHINA
Tantalum	D Block Metals, LLC	Conformant	UNITED STATES OF AMERICA
Tantalum	Exotech Inc.	Conformant	UNITED STATES OF AMERICA
Tantalum	F&X Electro-Materials Ltd.	Conformant	CHINA
Tantalum	FIR Metals & Resource Ltd.	Conformant	CHINA
Tantalum	Global Advanced Metals Aizu	Conformant	JAPAN
Tantalum	Global Advanced Metals Boyertown	Conformant	UNITED STATES OF AMERICA

<b>Metal</b>	<b>Smelter Name</b>	<b>Status*</b>	<b>Country</b>
Tantalum	Guangdong Rising Rare Metals-EO Materials Ltd.	Conformant	CHINA
Tantalum	Guangdong Zhiyuan New Material Co., Ltd.	Conformant	CHINA
Tantalum	H.C. Starck Co., Ltd.	Conformant	THAILAND
Tantalum	H.C. Starck Hermsdorf GmbH	Conformant	GERMANY
Tantalum	H.C. Starck Inc.	Conformant	UNITED STATES OF AMERICA
Tantalum	H.C. Starck Ltd.	Conformant	JAPAN
Tantalum	H.C. Starck Smelting GmbH & Co. KG	Conformant	GERMANY
Tantalum	H.C. Starck Tantalum and Niobium GmbH	Conformant	GERMANY
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	Conformant	CHINA
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	Conformant	CHINA
Tantalum	Jiangxi Tuohong New Raw Material	Conformant	CHINA
Tantalum	Jiujiang JinXin Nonferrous Metals Co., Ltd.	Conformant	CHINA
Tantalum	Jiujiang Nonferrous Metals Smelting Company Limited	Conformant	CHINA
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	Conformant	CHINA
Tantalum	KEMET Blue Metals	Conformant	MEXICO
Tantalum	KEMET Blue Powder	Conformant	UNITED STATES OF AMERICA
Tantalum	LSM Brasil S.A.	Conformant	BRAZIL
Tantalum	Metallurgical Products India Pvt., Ltd.	Conformant	INDIA
Tantalum	Mineracao Taboca S.A.	Conformant	BRAZIL
Tantalum	Mitsui Mining and Smelting Co., Ltd.	Conformant	JAPAN
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	Conformant	CHINA
Tantalum	NPM Silmet AS	Conformant	ESTONIA
Tantalum	Power Resources Ltd.	Conformant	MACEDONIA, THE FORMER YUGOSLAV REPUBLIC OF
Tantalum	QuantumClean	Conformant	UNITED STATES OF AMERICA
Tantalum	Resind Industria e Comercio Ltda.	Conformant	BRAZIL

<b>Metal</b>	<b>Smelter Name</b>	<b>Status*</b>	<b>Country</b>
Tantalum	RFH Tantalum Smeltery Co., Ltd./Yanling Jincheng Tantalum & Niobium Co., Ltd.	Conformant	CHINA
Tantalum	Solikamsk Magnesium Works OAO	Conformant	RUSSIAN FEDERATION
Tantalum	Taki Chemical Co., Ltd.	Conformant	JAPAN
Tantalum	Telex Metals	Conformant	UNITED STATES OF AMERICA
Tantalum	Ulba Metallurgical Plant JSC	Conformant	KAZAKHSTAN
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	Conformant	CHINA
Tin	Alpha	Conformant	UNITED STATES OF AMERICA
Tin	An Vinh Joint Stock Mineral Processing Company	Outreach	VIET NAM
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	Conformant	CHINA
Tin	China Tin Group Co., Ltd.	Conformant	CHINA
Tin	CNMC (Guangxi) PGMA Co., Ltd.	Outreach	CHINA
Tin	CV Ayi Jaya	Conformant	INDONESIA
Tin	CV Dua Sekawan	Conformant	INDONESIA
Tin	CV Gita Pesona	Conformant	INDONESIA
Tin	CV Serumpun Sebalai	Conformant	INDONESIA
Tin	CV Tiga Sekawan	Conformant	INDONESIA
Tin	CV United Smelting	Conformant	INDONESIA
Tin	CV Venus Inti Perkasa	Conformant	INDONESIA
Tin	Dowa	Conformant	JAPAN
Tin	Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company	Outreach	VIET NAM
Tin	EM Vinto	Conformant	BOLIVIA (PLURINATIONAL STATE OF)
Tin	Estanho de Rondonia S.A.	Outreach	BRAZIL
Tin	Fenix Metals	Conformant	POLAND
Tin	Gejiu Fengming Metallurgy Chemical Plant	Conformant	CHINA

<b>Metal</b>	<b>Smelter Name</b>	<b>Status*</b>	<b>Country</b>
Tin	Gejiu Jinye Mineral Company	Conformant	CHINA
Tin	Gejiu Kai Meng Industry and Trade LLC	Conformant	CHINA
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	Conformant	CHINA
Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	Conformant	CHINA
Tin	Gejiu Zili Mining And Metallurgy Co., Ltd.	Participating	CHINA
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	Conformant	CHINA
Tin	Guanyang Guida Nonferrous Metal Smelting Plant	Conformant	CHINA
Tin	HuiChang Hill Tin Industry Co., Ltd.	Conformant	CHINA
Tin	Huichang Jinshunda Tin Co., Ltd.	Conformant	CHINA
Tin	Jiangxi Ketai Advanced Material Co., Ltd.	Conformant	CHINA
Tin	Magnu's Minerais Metais e Ligas Ltda.	Conformant	BRAZIL
Tin	Malaysia Smelting Corporation (MSC)	Conformant	MALAYSIA
Tin	Melt Metais e Ligas S.A.	Conformant	BRAZIL
Tin	Metallic Resources, Inc.	Conformant	UNITED STATES OF AMERICA
Tin	Metallo Belgium N.V.	Conformant	BELGIUM
Tin	Metallo Spain S.L.U.	Conformant	SPAIN
Tin	Mineracao Taboca S.A.	Conformant	BRAZIL
Tin	Minsur	Conformant	PERU
Tin	Mitsubishi Materials Corporation	Conformant	JAPAN
Tin	Modeltech Sdn Bhd	Participating	MALAYSIA
Tin	Nankang Nanshan Tin Manufactory Co., Ltd.	Participating	CHINA
Tin	Nghe Tinh Non-Ferrous Metals Joint Stock Company	Outreach	VIET NAM
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	Conformant	THAILAND
Tin	O.M. Manufacturing Philippines, Inc.	Conformant	PHILIPPINES
Tin	Operaciones Metalurgical S.A.	Conformant	BOLIVIA (PLURINATIONAL STATE OF)

<b>Metal</b>	<b>Smelter Name</b>	<b>Status*</b>	<b>Country</b>
Tin	PT Aries Kencana Sejahtera	Conformant	INDONESIA
Tin	PT Artha Cipta Langgeng	Conformant	INDONESIA
Tin	PT ATD Makmur Mandiri Jaya	Conformant	INDONESIA
Tin	PT Babel Inti Perkasa	Conformant	INDONESIA
Tin	PT Bangka Prima Tin	Conformant	INDONESIA
Tin	PT Bangka Tin Industry	Conformant	INDONESIA
Tin	PT Belitung Industri Sejahtera	Conformant	INDONESIA
Tin	PT Bukit Timah	Conformant	INDONESIA
Tin	PT DS Jaya Abadi	Conformant	INDONESIA
Tin	PT Eunindo Usaha Mandiri	Conformant	INDONESIA
Tin	PT Inti Stania Prima	Conformant	INDONESIA
Tin	PT Karimun Mining	Conformant	INDONESIA
Tin	PT Kijang Jaya Mandiri	Conformant	INDONESIA
Tin	PT Lautan Harmonis Sejahtera	Conformant	INDONESIA
Tin	PT Menara Cipta Mulia	Conformant	INDONESIA
Tin	PT Mitra Stania Prima	Conformant	INDONESIA
Tin	PT Panca Mega Persada	Conformant	INDONESIA
Tin	PT Prima Timah Utama	Conformant	INDONESIA
Tin	PT Refined Bangka Tin	Conformant	INDONESIA
Tin	PT Sariwiguna Binasentosa	Conformant	INDONESIA
Tin	PT Stanindo Inti Perkasa	Conformant	INDONESIA
Tin	PT Sukses Inti Makmur	Conformant	INDONESIA
Tin	PT Sumber Jaya Indah	Conformant	INDONESIA
Tin	PT Timah (Persero) Tbk Kundur	Conformant	INDONESIA
Tin	PT Timah (Persero) Tbk Mentok	Conformant	INDONESIA

<b>Metal</b>	<b>Smelter Name</b>	<b>Status*</b>	<b>Country</b>
Tin	PT Tinindo Inter Nusa	Conformant	INDONESIA
Tin	PT Tommy Utama	Conformant	INDONESIA
Tin	Resind Industria e Comercio Ltda.	Conformant	BRAZIL
Tin	Rui Da Hung	Conformant	TAIWAN
Tin	Soft Metais Ltda.	Conformant	BRAZIL
Tin	Super Ligas	Outreach	BRAZIL
Tin	Thaisarco	Conformant	THAILAND
Tin	Tuyen Quang Non-Ferrous Metals Joint Stock Company	Outreach	VIET NAM
Tin	White Solder Metalurgia e Mineracao Ltda.	Conformant	BRAZIL
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	Conformant	CHINA
Tin	Yunnan Tin Company Limited	Conformant	CHINA
Tungsten	A.L.M.T. TUNGSTEN Corp.	Conformant	JAPAN
Tungsten	ACL Metais Eireli	Conformant	BRAZIL
Tungsten	Asia Tungsten Products Vietnam Ltd.	Conformant	VIET NAM
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.	Conformant	CHINA
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	Conformant	CHINA
Tungsten	Fujian Jinxin Tungsten Co., Ltd.	Conformant	CHINA
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	Conformant	CHINA
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	Conformant	CHINA
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	Conformant	CHINA
Tungsten	Ganzhou Yatai Tungsten Co., Ltd.	Outreach	CHINA
Tungsten	Global Tungsten & Powders Corp.	Conformant	UNITED STATES OF AMERICA
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	Conformant	CHINA
Tungsten	H.C. Starck Smelting GmbH & Co. KG	Conformant	GERMANY
Tungsten	H.C. Starck Tungsten GmbH	Conformant	GERMANY

<b>Metal</b>	<b>Smelter Name</b>	<b>Status*</b>	<b>Country</b>
Tungsten	Hunan Chenzhou Mining Co., Ltd.	Conformant	CHINA
Tungsten	Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji	Conformant	CHINA
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.	Conformant	CHINA
Tungsten	Hydrometallurg, JSC	Conformant	RUSSIAN FEDERATION
Tungsten	Japan New Metals Co., Ltd.	Conformant	JAPAN
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	Conformant	CHINA
Tungsten	Jiangxi Dayu Longxintai Tungsten Co., Ltd.	Outreach	CHINA
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	Conformant	CHINA
Tungsten	Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.	Outreach	CHINA
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	Conformant	CHINA
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	Conformant	CHINA
Tungsten	Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd.	Conformant	CHINA
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	Conformant	CHINA
Tungsten	Kennametal Fallon	Conformant	UNITED STATES OF AMERICA
Tungsten	Kennametal Huntsville	Conformant	UNITED STATES OF AMERICA
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	Conformant	CHINA
Tungsten	Moliren Ltd.	Conformant	RUSSIAN FEDERATION
Tungsten	Niagara Refining LLC	Conformant	UNITED STATES OF AMERICA
Tungsten	Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC	Conformant	VIET NAM
Tungsten	Philippine Chuangxin Industrial Co., Inc.	Conformant	PHILIPPINES
Tungsten	South-East Nonferrous Metal Company Limited of Hengyang City	Conformant	CHINA
Tungsten	Tejing (Vietnam) Tungsten Co., Ltd.	Conformant	VIET NAM
Tungsten	Unecha Refractory metals plant	Conformant	RUSSIAN FEDERATION
Tungsten	Vietnam Youngsun Tungsten Industry Co., Ltd.	Conformant	VIET NAM
Tungsten	Wolfram Bergbau und Hutten AG	Conformant	AUSTRIA

<b>Metal</b>	<b>Smelter Name</b>	<b>Status*</b>	<b>Country</b>
Tungsten	Woltech Korea Co., Ltd.	Conformant	KOREA, REPUBLIC OF
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	Conformant	CHINA
Tungsten	Xiamen Tungsten Co., Ltd.	Conformant	CHINA
Tungsten	Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.	Conformant	CHINA
Tungsten	Xinhai Rendan Shaoguan Tungsten Co., Ltd.	Conformant	CHINA
Cobalt	Freeport Kokkola	Outreach	FINLAND
Cobalt	Umicore Olen	Outreach	BELGIUM

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

Gold	Argentina, Armenia, Australia, Austria, Azerbaijan, Belarus, Belgium, Benin, Bolivia (Plurinational State of), Bosnia and Herzegovina, Brazil, Bulgaria, Burkina Faso, Canada, Chile, China, Colombia, Costa Rica, Czech Republic, Democratic Republic of the Congo, Denmark, Dominican Republic, Ecuador, Egypt, Estonia, Ethiopia, Eritrea, Fiji, Finland, France, Gabon, Georgia, Germany, Ghana, Greece, Guatemala, Guinea, Guyana, Honduras, Hong Kong, Hungary, Indonesia, Ireland, Israel, Italy, Ivory Coast, Japan, Kazakstan, Kenya, Kyrgyzstan, Laos, Latvia, Liechtenstein, Liberia, Lithuania, Luxembourg, Macau, Malaysia, Mali, Mauritania, Mexico, Mongolia, Morocco, Namibia, Netherlands, New Zealand, Nicaragua, Niger, Norway, Panama, Papua New Guinea, Peru, Phillipines, Poland, Portugal, Romania, Russian Federation, Saudi Arabia, Senegal, Serbia, Singapore, Slovakia, South Africa, South Korea, Spain, Suriname, Sweden, Switzerland, Taiwan, Tanzania, Thailand, Togo, Turkey, Uruguay, United Arab Emirates, United Kingdom of Great Britain and Northern Ireland, United States, Uzbekistan, Venezuela, Zambia, and Zimbabwe
Tantalum	Australia, Bolivia (Plurinational State of), Brazil, Burundi, China, Colombia, Democratic Republic of the Congo, Ethiopia, France, Guinea, Guyana, India, Kazakstan, Madagascar, Malaysia, Mozambique, Namibia, Nigeria, Russian Federation, Rwanda, Sierra Leone, Thailand, United States, and Zimbabwe
Tin	Australia, Bolivia (Plurinational State of), Brazil, Burundi, China, Colombia, Democratic Republic of the Congo, Germany, Indonesia, Laos, Malaysia, Mongolia, Myanmar, Nigeria, Peru, Portugal, Russian Federation, Rwanda, Thailand, Uganda, United Kingdom of Great Britain and Northern Ireland, Viet Nam, and Zimbabwe
Tungsten	Australia, Austria, Bolivia (Plurinational State of), Brazil, Burundi, Canada, China, Colombia, Democratic Republic of the Congo, Japan, Mexico, Mongolia, Nigeria, Portugal, Russian Federation, Rwanda, Spain, United Kingdom of Great Britain and Northern Ireland, United States, Uzbekistan, and Viet Nam