



ACER INCORPORATED 2019 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 on 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. Last year, Acer continued its responsible minerals program that includes priority minerals sourced from conflict affected and high risk areas (CAHRA). Each year Acer has been able to make substantial progress towards ensuring responsibly sourced minerals. 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 2019, 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 as well as tin sourced from Indonesia, both of which have been determined to originate from CAHRAs. Cobalt, Indonesia tin, and 3TG have all been identified by Acer to be 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.

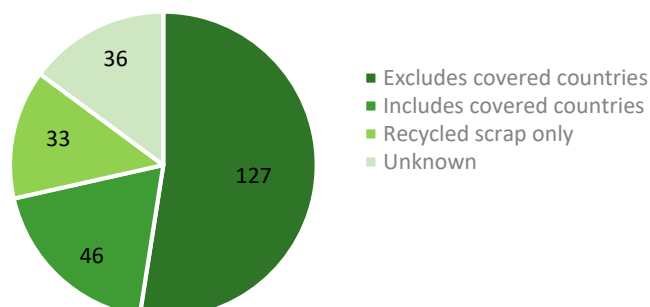
Founded in 1976, today Acer is one of the world’s top ICT companies and has a presence in over 160 countries. As Acer looks into the future, it is focused on enabling a world where hardware, software and services will infuse with one another to open up new possibilities for consumers and businesses alike. 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-group.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 RMI, Acer’s primary means of determining country of origin of necessary 3TG was by conducting a supply-chain survey with direct suppliers using the 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 a validation 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 2019, Acer was able to identify 242 SORs in its supply chain. Out of 242 total SORs, RCOI information was available for 162 through validation by the RMAP. Of the remaining 80 SORs, Acer was able to determine the country of origin for 44, leaving 36 that remain unknown. The results of Acer’s RCOI are provided in Figure 1.

Figure 1: Reasonable Country of Origin Inquiry



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, 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.

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.
 - Continued development of internal data management and reporting system to increase the ease of use and to enable efficiencies for Acer and its supply chain during supply chain data transfer, supplier engagement, and the identification and mitigation of risks.
 - Continue to maintain a publically available responsible minerals policy that 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 to update activities associated with ongoing improvements to Acer's data management system.
 - 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 review the RMI Grievance and Complaints Mechanism results to be informed of the issues and the steps taken to address the matters.
- Continued to provide capacity building through our annual supplier CSR communication meeting. Acer provided follow-up training on the implementation of its new software solution, 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 1st 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 Acer's supply chain using the CMRT and received 100% direct supplier response rate.
- Conducted Acer's second cobalt survey using the RMI Cobalt Reporting Template (CRT), while expanding our supplier scope beyond lithium-ion battery suppliers to also include hard drive and final assembly suppliers, receiving an 87% response rate.
- Consolidated the supplier survey responses for 3TG and cobalt and compared the results with the RMI known SOR lists and the RMAP to verify true SORs, SOR status, mines of origin, and conflict-free status for 3TG.
- Shared lists of 3TG and cobalt SORs with the RMI to assist the RMI with maintaining an up-to-date 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 2019, Acer identified findings for two suppliers via audits. One supplier did not review their Conflict Minerals Policy and Management procedures on an annual basis. Acer worked with that supplier to ensure that a review process was in place to annually reassess the effectiveness of their conflict minerals procedures. The other supplier did not have due diligence procedures in place. Acer worked with that supplier to establish due diligence procedures that identify 3TG smelters, assess and mitigate risk related to SORs in their supply chain, ensuring conformance and making improvements where process gaps have been identified.
- 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 connections with 105 smelters and has received 92 RRAs.

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

- Improved the effectiveness of our supplier engagement and feedback process through the further refinement of our internal data management system to enable more effective supplier engagement.
- Continued engaging SORs directly for both 3TG and cobalt to encourage participation in the RMAP and to provide pressure on SORs to remain engaged in the program.
- 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.
- 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. The majority of Acer suppliers fall into the “good” category. Although we did identify some suppliers that required immediate improvement. At the time of the writing of this report, all suppliers requiring immediate improvement were able to implement corrective action. A summary of the results of our supplier CSR scorecards is provided in Table 1 below.

Table 1: CSR Scorecard Results

Score Category	Score	Suppliers
Needs improvement immediately	<5	3.8%
Needs Improvement	5 - 8	5.7%
Good	9 - 10	90.6%

- 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.

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 and cobalt) that have been identified in Acer's supply chain as a result of its due diligence measures (see Appendix B).
 - 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.
- Contributes funding and participates as a member of the PPA, an organization whose goal is to award funding for in-region programs that seek to spur economic development and develop minerals tracing systems. In 2019, Acer participated on the Artisanal Finance Evaluation Committee to review artisanal pilot concepts for potential funding by the PPA. Acer also attended the annual multi-stakeholder membership meeting to hear a summary of the state of the PPA, which included current membership, resources, activities, and achievements. Members also provided feedback on priority topics and how they may support future achievements towards PPA objectives, as well as held a discussion on potential impacts and outcomes of a delegation visit to the DRC in December. Finally, Acer joined a co-creation session with PPA members and USAID to explore opportunities for longer-term planning, action, and resources for the PPA.
- Participated as a member of RMI's Tin Working Group (TWG), which is focused on significant risk areas including social/economic risks, occupational health and safety, environmental degradation, and challenging legal/regulatory issues related

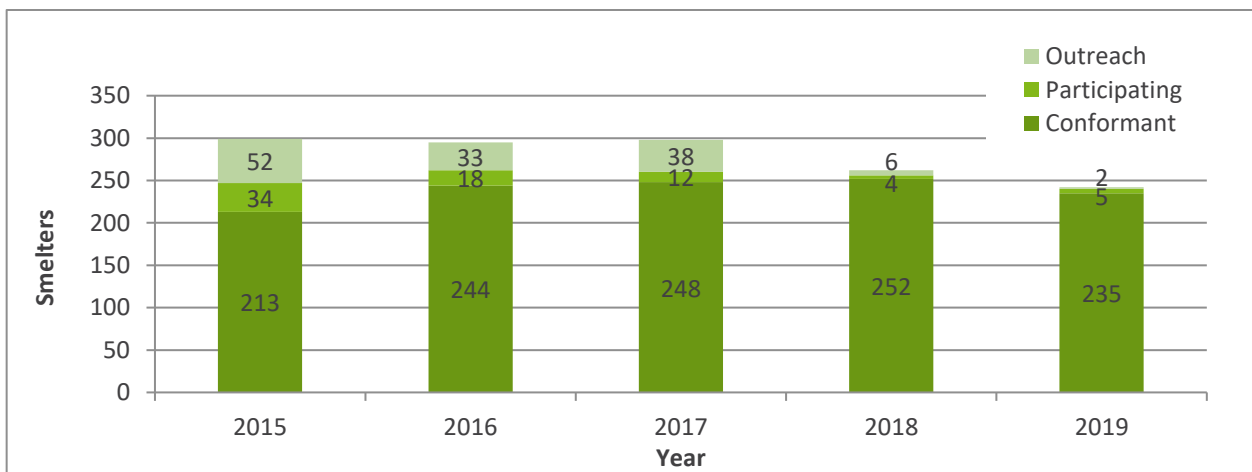
to mining tin in Indonesia. Activities in 2019 included the completion of phase II, which included the development of two practical guides on sustainable land reclamation and OHS capacity building. Also, the TWG roadmap was updated based on the group activities and deliverables. Finally, the membership held a phase II exit meeting to discuss the current format and the path forward within the RMI in 2020.

Results of Due Diligence Measures

As a result of its due diligence measures in 2019, Acer was able to identify 242 unique 3TG and 28 cobalt 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 2019 reporting year, Acer is also providing an update to its progress year-over-year (Figures 2 & 3), which includes the historical results for 3TG and cobalt, and individual metal performance for the current reporting year (Figure 4). Both charts include the SOR status as of April 9, 2020 and clearly show the excellent progress Acer has made as a result of its due diligence efforts.

Figure 2: 3TG Progress



*Status is defined as follows:

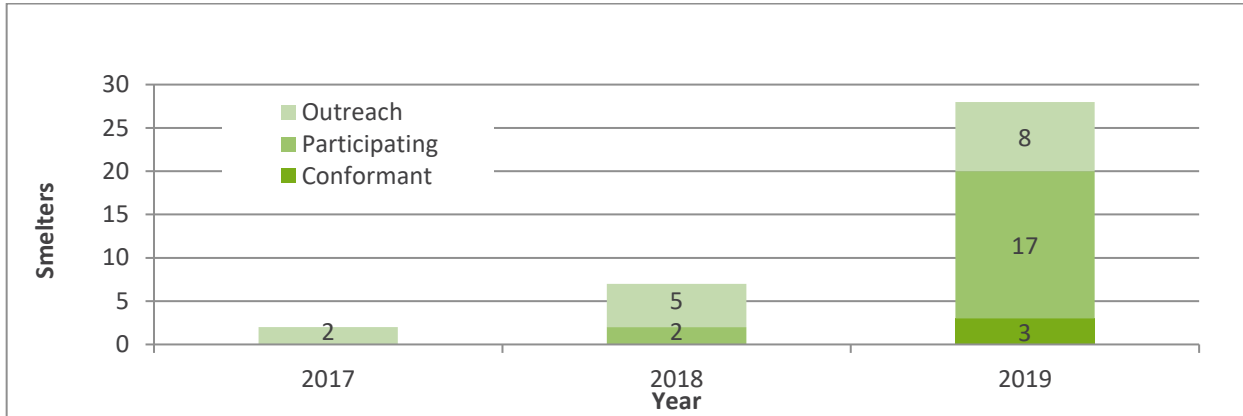
Conformant: Smelters or refiners that are conformant to the Responsible Minerals Assurance Process (RMAP) assessment protocols or have been validated by a similar validation program (e.g., the London Bullion Market Association's *Responsible Gold Programme* or the Responsible Jewelry Council's *Chain-of-Custody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

Participating: Smelters or refiners that have committed to undergo an RMAP audit

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 3: Cobalt Progress



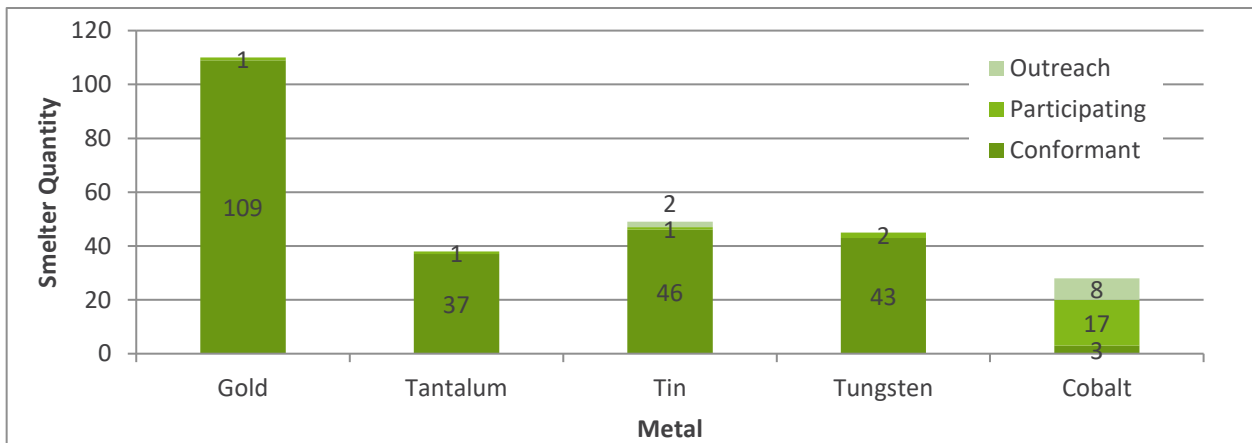
*Status is defined as follows:

Conformant: Refiners that are conformant to the Responsible Minerals Assurance Process (RMAP) assessment protocol

Participating: Refiners that have committed to undergo an RMAP audit

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

Figure 4: 2019 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

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– the complete list of SORs that were confirmed to be part of Acer's supply chain during the 2019 reporting period.

Acer continues to reach toward the ultimate goal of having 100% of its 3TG SORs engaged in the RMAP, either conformant or participating in the process with the goal of becoming conformant. However, due to the dynamic nature of our supply chain and the existence of a due diligence process that identifies risk mitigation opportunities, Acer understands that it's realistic to assume that there may always be a number of SORs that require outreach or are in the process of being added or removed from the supply chain. In 2019, Acer set a target that 95% of 3TG SORs would be RMAP conformant and 100% would be either RMAP conformant or participating, allowing for a small quantity of SORs to be in the risk mitigation or transition phase. With the results of 97% conformant and 99% when including the participating SORs, Acer exceeded its goal for conformant SORs, but fell short of its goal for conformant and participating SORs by 1%. Regardless, Acer improved on both measurements when compared to last year and will continue to strive towards meeting those goals in 2020.

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.
- Increase participation in 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 2020, our targets are: 95% of SORs are conformant to an OECD-aligned 3rd party mechanism and 100% are either conformant to or participating in an OECD-aligned 3rd party mechanism.

Appendix A – Supply Chain Indicators

Indicator	Result				
	2015	2016	2017	2018	2019
Number of supplier audits conducted	71	70	71	105	101
Number of supplier factories in compliance with Acer's policy or program	65	66	69	105	99
Percentage of suppliers that have adopted a conflict minerals policy	97%	98%	100%	100%	100%
- Policy is publically available on supplier's website	78%	84%	86%	91%	92%
Suppliers that have required their direct suppliers to source from smelters validated by an independent third party audit	100%	100%	100%	94%	98%
Percentage of validated smelters in the supply chain that are known to not be sourcing from covered countries	52%	60%	56%	60%	52%
Percentage of validated smelters in the supply chain that are known to be sourcing from covered countries	11%	18%	13%	17%	19%
Quantity of smelters that are known to be sourcing from covered countries (Percentage that are validated)	23 (100%)	43 (100%)	40 (100%)	44 (100%)	46 (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

Metal	Smelter Name	Country
Gold	8853 S.p.A.	ITALY
Gold	Advanced Chemical Company	UNITED STATES OF AMERICA
Gold	Aida Chemical Industries Co., Ltd.	JAPAN
Gold	Al Etihad Gold Refinery DMCC	UNITED ARAB EMIRATES
Gold	Allgemeine Gold-und Silberscheideanstalt A.G.	GERMANY
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN
Gold	AngloGold Ashanti Corrego do Sitio Mineracao	BRAZIL
Gold	Argor-Heraeus S.A.	SWITZERLAND
Gold	Asahi Pretec Corp.	JAPAN
Gold	Asahi Refining Canada Ltd.	CANADA
Gold	Asahi Refining USA Inc.	UNITED STATES OF AMERICA
Gold	Asaka Riken Co., Ltd.	JAPAN
Gold	AU Traders and Refiners	SOUTH AFRICA
Gold	Aurubis AG	GERMANY
Gold	Bangalore Refinery	INDIA
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES
Gold	Boliden AB	SWEDEN
Gold	C. Hafner GmbH + Co. KG	GERMANY
Gold	CCR Refinery - Glencore Canada Corporation	CANADA
Gold	Cendres + Metaux S.A.	SWITZERLAND
Gold	Chimet S.p.A.	ITALY
Gold	Chugai Mining	JAPAN
Gold	Daye Non-Ferrous Metals Mining Ltd.	CHINA

Metal	Smelter Name	Country
Gold	DODUCO Contacts and Refining GmbH	GERMANY
Gold	Dowa	JAPAN
Gold	DS PRETECH Co., Ltd.	SOUTH KOREA
Gold	DSC (Do Sung Corporation)	SOUTH KOREA
Gold	Eco-System Recycling Co., Ltd. East Plant	JAPAN
Gold	Eco-System Recycling Co., Ltd. North Plant	JAPAN
Gold	Eco-System Recycling Co., Ltd. West Plant	JAPAN
Gold	Emirates Gold DMCC	UNITED ARAB EMIRATES
Gold	Geib Refining Corporation	UNITED STATES OF AMERICA
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CHINA
Gold	Great Wall Precious Metals Co., Ltd. of CBPM	CHINA
Gold	Heimerle + Meule GmbH	GERMANY
Gold	Heraeus Metals Hong Kong Ltd.	CHINA
Gold	Heraeus Precious Metals GmbH & Co. KG	GERMANY
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CHINA
Gold	Ishifuku Metal Industry Co., Ltd.	JAPAN
Gold	Istanbul Gold Refinery	TURKEY
Gold	Italpreziosi	ITALY
Gold	Japan Mint	JAPAN
Gold	Jiangxi Copper Co., Ltd.	CHINA
Gold	JSC Uralelectromed	RUSSIAN FEDERATION
Gold	JX Nippon Mining & Metals Co., Ltd.	JAPAN
Gold	Kazzinc	KAZAKHSTAN
Gold	Kennecott Utah Copper LLC	UNITED STATES OF AMERICA
Gold	KGHM Polska Miedz Spolka Akcyjna	POLAND
Gold	Kojima Chemicals Co., Ltd.	JAPAN

Metal	Smelter Name	Country
Gold	Korea Zinc Co., Ltd.	SOUTH KOREA
Gold	Kyrgyzaltyn JSC	KYRGYZSTAN
Gold	L'Orfebre S.A.	ANDORRA
Gold	LS-NIKKO Copper Inc.	SOUTH KOREA
Gold	LT Metal Ltd.	SOUTH KOREA
Gold	Marsam Metals	BRAZIL
Gold	Materion	UNITED STATES OF AMERICA
Gold	Matsuda Sangyo Co., Ltd.	JAPAN
Gold	Metalor Technologies (Hong Kong) Ltd.	CHINA
Gold	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE
Gold	Metalor Technologies (Suzhou) Ltd.	CHINA
Gold	Metalor Technologies S.A.	SWITZERLAND
Gold	Metalor USA Refining Corporation	UNITED STATES OF AMERICA
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	MEXICO
Gold	Mitsubishi Materials Corporation	JAPAN
Gold	Mitsui Mining and Smelting Co., Ltd.	JAPAN
Gold	MMTC-PAMP India Pvt., Ltd.	INDIA
Gold	Moscow Special Alloys Processing Plant	RUSSIAN FEDERATION
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	TURKEY
Gold	Navoi Mining and Metallurgical Combinat	UZBEKISTAN
Gold	Nihon Material Co., Ltd.	JAPAN
Gold	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	AUSTRIA
Gold	Ohura Precious Metal Industry Co., Ltd.	JAPAN
Gold	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	RUSSIAN FEDERATION
Gold	OJSC Novosibirsk Refinery	RUSSIAN FEDERATION
Gold	PAMP S.A.	SWITZERLAND

Metal	Smelter Name	Country
Gold	Planta Recuperadora de Metales SpA	CHILE
Gold	Prioksky Plant of Non-Ferrous Metals	RUSSIAN FEDERATION
Gold	PT Aneka Tambang (Persero) Tbk	INDONESIA
Gold	PX Precinox S.A.	SWITZERLAND
Gold	Rand Refinery (Pty) Ltd.	SOUTH AFRICA
Gold	REMONDIS PMR B.V.	NETHERLANDS
Gold	Royal Canadian Mint	CANADA
Gold	SAAMP	FRANCE
Gold	Safimet S.p.A	ITALY
Gold	SAFINA A.S.	CZECH REPUBLIC
Gold	Samduck Precious Metals	SOUTH KOREA
Gold	SAXONIA Edelmetalle GmbH	GERMANY
Gold	SEMPSA Joyeria Plateria S.A.	SPAIN
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CHINA
Gold	Sichuan Tianze Precious Metals Co., Ltd.	CHINA
Gold	Singway Technology Co., Ltd.	TAIWAN
Gold	SOE Shyolkovsky Factory of Secondary Precious Metals	RUSSIAN FEDERATION
Gold	Solar Applied Materials Technology Corp.	TAIWAN
Gold	Sumitomo Metal Mining Co., Ltd.	JAPAN
Gold	SungEel HiMetal Co., Ltd.	SOUTH KOREA
Gold	T.C.A S.p.A	ITALY
Gold	Tanaka Kikinzoku Kogyo K.K.	JAPAN
Gold	The Refinery of Shandong Gold Mining Co., Ltd.	CHINA
Gold	Tokuriki Honten Co., Ltd.	JAPAN
Gold	Torecom	SOUTH KOREA
Gold	Umicore Brasil Ltda.	BRAZIL

Metal	Smelter Name	Country
Gold	Umicore Precious Metals Thailand	THAILAND
Gold	Umicore S.A. Business Unit Precious Metals Refining	BELGIUM
Gold	United Precious Metal Refining, Inc.	UNITED STATES OF AMERICA
Gold	Valcambi S.A.	SWITZERLAND
Gold	Western Australian Mint (T/a The Perth Mint)	AUSTRALIA
Gold	WIELAND Edelmetalle GmbH	GERMANY
Gold	Yamakin Co., Ltd.	JAPAN
Gold	Yokohama Metal Co., Ltd.	JAPAN
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA
Tantalum	Asaka Riken Co., Ltd.	JAPAN
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	CHINA
Tantalum	CP Metals Inc.	UNITED STATES OF AMERICA
Tantalum	D Block Metals, LLC	UNITED STATES OF AMERICA
Tantalum	Exotech Inc.	UNITED STATES OF AMERICA
Tantalum	F&X Electro-Materials Ltd.	CHINA
Tantalum	FIR Metals & Resource Ltd.	CHINA
Tantalum	Global Advanced Metals Aizu	JAPAN
Tantalum	Global Advanced Metals Boyertown	UNITED STATES OF AMERICA
Tantalum	Guangdong Zhiyuan New Material Co., Ltd.	CHINA
Tantalum	H.C. Starck Co., Ltd.	THAILAND
Tantalum	H.C. Starck Hermsdorf GmbH	GERMANY
Tantalum	H.C. Starck Inc.	UNITED STATES OF AMERICA
Tantalum	H.C. Starck Ltd.	JAPAN
Tantalum	H.C. Starck Smelting GmbH & Co. KG	GERMANY
Tantalum	H.C. Starck Tantalum and Niobium GmbH	GERMANY
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA

Metal	Smelter Name	Country
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHINA
Tantalum	Jiangxi Tuohong New Raw Material	CHINA
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINA
Tantalum	Jiujiang Tanbre Co., Ltd.	CHINA
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA
Tantalum	KEMET Blue Metals	MEXICO
Tantalum	LSM Brasil S.A.	BRAZIL
Tantalum	Metallurgical Products India Pvt., Ltd.	INDIA
Tantalum	Mineracao Taboca S.A.	BRAZIL
Tantalum	Mitsui Mining and Smelting Co., Ltd.	JAPAN
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA
Tantalum	NPM Silmet AS	ESTONIA
Tantalum	PRG Dooel	MACEDONIA
Tantalum	QuantumClean	UNITED STATES OF AMERICA
Tantalum	Resind Industria e Comercio Ltda.	BRAZIL
Tantalum	Solikamsk Magnesium Works OAO	RUSSIAN FEDERATION
Tantalum	Taki Chemical Co., Ltd.	JAPAN
Tantalum	Telex Metals	UNITED STATES OF AMERICA
Tantalum	Ulba Metallurgical Plant JSC	KAZAKHSTAN
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	CHINA
Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	CHINA
Tin	Alpha	UNITED STATES OF AMERICA
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CHINA
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CHINA
Tin	China Tin Group Co., Ltd.	CHINA
Tin	Dongguan CiEXPO Environmental Engineering Co., Ltd.	CHINA

Metal	Smelter Name	Country
Tin	Dowa	JAPAN
Tin	EM Vinto	BOLIVIA
Tin	Fenix Metals	POLAND
Tin	Gejiu Kai Meng Industry and Trade LLC	CHINA
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA
Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	CHINA
Tin	Gejiu Zili Mining And Metallurgy Co., Ltd.	CHINA
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CHINA
Tin	Guanyang Guida Nonferrous Metal Smelting Plant	CHINA
Tin	HuiChang Hill Tin Industry Co., Ltd.	CHINA
Tin	Huichang Jinshunda Tin Co., Ltd.	CHINA
Tin	Jiangxi New Nanshan Technology Ltd.	CHINA
Tin	Ma'anshan Weitai Tin Co., Ltd.	CHINA
Tin	Magnu's Minerais Metais e Ligas Ltda.	BRAZIL
Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA
Tin	Melt Metais e Ligas S.A.	BRAZIL
Tin	Metallic Resources, Inc.	UNITED STATES OF AMERICA
Tin	Metallo Belgium N.V.	BELGIUM
Tin	Metallo Spain S.L.U.	SPAIN
Tin	Mineracao Taboca S.A.	BRAZIL
Tin	Minsur	PERU
Tin	Mitsubishi Materials Corporation	JAPAN
Tin	Modeltech Sdn Bhd	MALAYSIA
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND
Tin	O.M. Manufacturing Philippines, Inc.	PHILIPPINES
Tin	Operaciones Metalurgicas S.A.	BOLIVIA

Metal	Smelter Name	Country
Tin	Precious Minerals and Smelting Limited	INDIA
Tin	PT Artha Cipta Langgeng	INDONESIA
Tin	PT ATD Makmur Mandiri Jaya	INDONESIA
Tin	PT Menara Cipta Mulia	INDONESIA
Tin	PT Mitra Stania Prima	INDONESIA
Tin	PT Refined Bangka Tin	INDONESIA
Tin	PT Timah Tbk Kundur	INDONESIA
Tin	PT Timah Tbk Mentok	INDONESIA
Tin	Resind Industria e Comercio Ltda.	BRAZIL
Tin	Rui Da Hung	TAIWAN
Tin	Soft Metais Ltda.	BRAZIL
Tin	Thai Nguyen Mining and Metallurgy Co., Ltd.	VIET NAM
Tin	Thaisarco	THAILAND
Tin	Tin Technology & Refining	UNITED STATES OF AMERICA
Tin	White Solder Metalurgia e Mineracao Ltda.	BRAZIL
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA
Tin	Yunnan Tin Company Limited	CHINA
Tin	Yunnan Yunfan Non-ferrous Metals Co., Ltd.	CHINA
Tungsten	A.L.M.T. Corp.	JAPAN
Tungsten	ACL Metais Eireli	BRAZIL
Tungsten	Asia Tungsten Products Vietnam Ltd.	VIET NAM
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.	CHINA
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA
Tungsten	Fujian Ganmin RareMetal Co., Ltd.	CHINA
Tungsten	Fujian Jinxin Tungsten Co., Ltd.	CHINA
Tungsten	Ganzhou Haichuang Tungsten Co., Ltd.	CHINA

Metal	Smelter Name	Country
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	CHINA
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHINA
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA
Tungsten	Global Tungsten & Powders Corp.	UNITED STATES OF AMERICA
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CHINA
Tungsten	H.C. Starck Smelting GmbH & Co. KG	GERMANY
Tungsten	H.C. Starck Tungsten GmbH	GERMANY
Tungsten	Hunan Chenzhou Mining Co., Ltd.	CHINA
Tungsten	Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji	CHINA
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.	CHINA
Tungsten	Hunan Litian Tungsten Industry Co., Ltd.	CHINA
Tungsten	Hydrometallurg, JSC	RUSSIAN FEDERATION
Tungsten	Japan New Metals Co., Ltd.	JAPAN
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CHINA
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHINA
Tungsten	Jiangxi Xianglu Tungsten Co., Ltd.	CHINA
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CHINA
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CHINA
Tungsten	JSC "Kirovgrad Hard Alloys Plant"	RUSSIAN FEDERATION
Tungsten	Kennametal Fallon	UNITED STATES OF AMERICA
Tungsten	Kennametal Huntsville	UNITED STATES OF AMERICA
Tungsten	KGETS Co., Ltd.	SOUTH KOREA
Tungsten	Lianyou Metals Co., Ltd.	TAIWAN
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CHINA
Tungsten	Masan Tungsten Chemical LLC (MTC)	VIET NAM

Metal	Smelter Name	Country
Tungsten	Moliren Ltd.	RUSSIAN FEDERATION
Tungsten	Niagara Refining LLC	UNITED STATES OF AMERICA
Tungsten	Philippine Chuangxin Industrial Co., Inc.	PHILIPPINES
Tungsten	Tejing (Vietnam) Tungsten Co., Ltd.	VIET NAM
Tungsten	Unecha Refractory metals plant	RUSSIAN FEDERATION
Tungsten	Wolfram Bergbau und Hutten AG	AUSTRIA
Tungsten	Woltech Korea Co., Ltd.	SOUTH KOREA
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CHINA
Tungsten	Xiamen Tungsten Co., Ltd.	CHINA
Tungsten	Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.	CHINA
Tungsten	Xinhai Rendan Shaoguan Tungsten Co., Ltd.	CHINA
Cobalt	Compagnie de Tifnout Tiranimine	MOROCCO
Cobalt	Dynatec Madagascar Company	MADAGASCAR
Cobalt	Gangzhou Yi Hao Umicore Industry Co.	CHINA
Cobalt	Ganzhou Highpower Technology Co., Ltd.	CHINA
Cobalt	Ganzhou Tengyuan Cobalt New Material Co., Ltd.	CHINA
Cobalt	Gem (Jiangsu) Cobalt Industry Co., Ltd.	CHINA
Cobalt	Glencore Nikkelverk Refinery	NORWAY
Cobalt	Guangdong Jiana Energy Technology Co., Ltd.	CHINA
Cobalt	Guangxi Yinyi Advanced Material Co., Ltd.	CHINA
Cobalt	Hunan Brunp Recycling Technology Co., Ltd.	CHINA
Cobalt	Hunan Zoomwe New Energy Science & Technology Co., Ltd.	CHINA
Cobalt	Jiangsu Xiongfeng Technology Co., Ltd.	CHINA
Cobalt	Jiangxi Jiangwu Cobalt industrial Co., Ltd.	CHINA
Cobalt	Jingmen GEM Co., Ltd.	CHINA
Cobalt	JSC Kolskaya Mining and Metallurgical Company (Kola MMC)	RUSSIAN FEDERATION

Metal	Smelter Name	Country
Cobalt	Lanzhou Jinchuan Advanced Materials Technology Co., Ltd.	CHINA
Cobalt	Murrin Murrin Nickel Cobalt Plant	AUSTRALIA
Cobalt	Nantong Xinwei Nickel Cobalt Technology Development Co., Ltd.	CHINA
Cobalt	New Era Group Zhejiang Zhongneng Cycle Technology Co., Ltd.	CHINA
Cobalt	NORILSK NICKEL HARJAVALTA OY	FINLAND
Cobalt	Quzhou Huayou Cobalt New Material Co., Ltd.	CHINA
Cobalt	Sumitomo Metal Mining	JAPAN
Cobalt	SungEel HiTech Co.,Ltd.	SOUTH KOREA
Cobalt	Tianjin Maolian Science & Technology Co., Ltd.	CHINA
Cobalt	Umicore Finland Oy	FINLAND
Cobalt	Umicore Olen	BELGIUM
Cobalt	Zhejiang Huayou Cobalt Company Limited	CHINA
Cobalt	Zhuhai Kelixin Metal Materials Co., Ltd.	CHINA

Countries of origin for minerals processed by 3TG smelters in the above list may include:

Covered Countries Angola, Burundi, Democratic Republic of the Congo, Rwanda, Tanzania, Uganda, and Zambia

Outside Covered Countries Argentina, Armenia, Australia, Austria, Azerbaijan, Belarus, Belgium, Benin, Bolivia, Botswana, Brazil, Brunei, Bulgaria, Burkina Faso, Cameroon, Canada, Chile, China, Colombia, Croatia, Cuba*, Cyprus, Czech Republic, Denmark, Dominican Republic, Ecuador, Egypt, El Salvador, Eritrea, Estonia, Ethiopia, Fiji, Finland, France, Gabon, Gambia, Georgia, Germany, Ghana, Greece, Guatemala, Guinea, Guyana, Honduras, Hong Kong, Hungary, Iceland, India, Indonesia, Iran*, Ireland, Israel, Italy, Japan, Jordan, Kazakhstan, Kenya, Kuwait, Kyrgyzstan, Laos, Latvia, Lebanon, Liberia, Liechtenstein, Lithuania, Luxembourg, Macau, Madagascar, Malaysia, Mali, Malta, Mauritania, Mauritius, Mexico, Monaco, Mongolia, Morocco, Mozambique, Myanmar, Namibia, Netherlands, New Caledonia, New Zealand, Nicaragua, Niger, Nigeria, Norway, Pakistan, Panama, Papua New Guinea, Paraguay, Peru, Philippines, Poland, Portugal, Puerto Rico, Qatar, Romania, Russian Federation, San Marino, Saudi Arabia, Senegal, Serbia, Sierra Leone, Singapore, Slovakia, Slovenia, Solomon Islands, Somaliland, South Africa, South Korea, Spain, Sudan*, Suriname, Swaziland, Sweden, Switzerland, Taiwan, Tajikistan, Thailand, Togo, Trinidad and Tobago, Tunisia, Turkey, Ukraine, United Arab Emirates, United Kingdom, United States of America, Uruguay, Uzbekistan, Venezuela*, Vietnam, Yemen, and Zimbabwe

* Minerals from this country were substantially transformed before being incorporated into finished products. Such a substantial transformation of the minerals happened outside of the United States in a third country by a person other than a United States person.