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## Section 1: SD (FORM SD)

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

**FORM SD**  
**Specialized Disclosure Report**

**CUI Global, Inc.**  
(Exact name of registrant as specified in its charter)

|   |                             |   |
|---|-----------------------------|---|
| Colorado  | 0-29923                     | 84-1463284                              |
| (State or other jurisdiction of<br>incorporation or organization) | (Commission<br>File Number) | (I.R.S. Employer<br>Identification No.) |

20050 SW 112th Avenue  
Tualatin, Oregon, 97062  
(Address of Principal Executive Offices)

William J. Clough, President/CEO  
CUI Global, Inc.  
20050 SW 112th Avenue  
Tualatin, Oregon 97062  
(503) 612-2300

(Name and telephone number, including area code, of the person to contact in  
connection with this report.)

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

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

## **Section 1 - Conflict Minerals Disclosure**

### **Item 1.01 Conflict Minerals Disclosure and Report**

Conflict Minerals Disclosure:

CUI Global, Inc. evaluated its current product lines and determined that, for the year 2017, certain products we manufacture or contract to manufacture contain tin, tungsten, tantalum and/or gold (“3TGs”).

Accordingly, CUI Global, Inc. has conducted in good faith a “reasonable country of origin inquiry” (“RCOI”) that is reasonably designed to determine whether any of the 3TGs used in CUI Global, Inc. products originated or may have originated in the Democratic Republic of the Congo (“DRC”) or an adjoining country (collectively referred to as the “Covered Countries”) or are from recycled or scrap sources. The Company conducted a supply chain survey with direct suppliers using the Conflict Minerals Reporting Template (“CMRT”).

Based on the results of the RCOI, CUI Global, Inc. has reason to believe that some of the 3TGs used in products it manufactures or contracts to manufacture may have originated in the Covered Countries and do not come from scrapped or recycled sources. Thus, CUI Global, Inc. is required by Rule 13p-1 under the Securities Exchange Act to prepare a Conflict Minerals Report, which is filed as Exhibit 1.01 to this Specialized Disclosure Form. A copy of The Company's Specialized Disclosure Form (“Form SD”) and the associated Conflict Minerals Report is provided and is publicly available at: <http://www.cuiglobal.com/Conflict-Minerals/Index?KeyGenPage=1073750924>

### **Item 1.02 Exhibit**

Exhibit 1.01 – Conflict Minerals Report

## **Section 2 – Exhibits**

### **Item 2.01 Exhibits**

The following exhibit is filed as part of this report

Exhibit 1.01 – Conflict Minerals Report

## Signatures

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned this 30th day of May 2018.

CUI Global, Inc.  
(Registrant)

By: /s/ William J. Clough  
William J. Clough,  
President/CEO

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## Section 2: EX-1.01 (EXHIBIT 1.01)

### Exhibit 1.01

#### CUI Global, Inc.

#### **Conflict Minerals Report** (For Year Ended December 31, 2017)

#### Introduction

This report for the year ended December 31, 2017 is presented to comply with Rule 13p-1 under the Securities Exchange Act of 1934 (“the Rule”). The Rule was adopted by the Securities and Exchange Commission (“SEC”) to implement reporting and disclosure requirements related to conflict minerals as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (“Dodd-Frank Act”). The Rule requires SEC reporting companies that meet certain threshold requirements, to undertake a reasonable country of origin inquiry (“RCOI”) and supply chain due diligence on the source and chain of custody of the “conflict minerals” necessary to the functionality or production of any product manufactured or contracted to be manufactured by the reporting company.

The term “conflict minerals” is defined in Section 1502(e)(4) of the Act as: (A) columbite-tantalite, also known as coltan (the metal ore from which tantalum is extracted); cassiterite (the metal ore from which tin is extracted); gold; wolframite (the metal ore from which tungsten is extracted); or their derivatives or (B) any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo (“DRC”) or an adjoining country (the “Covered Countries”). The “Covered Countries” include Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia. For purposes of this Conflict Minerals Report, tin, tungsten, tantalum and gold will herein be referred to as the 3TGs for discussion purposes.

CUI Global, Inc. has reason to believe that some of the 3TGs present in our supply chain may have originated in the Covered Countries. CUI Global, Inc. is unable with absolute assurance to determine the origin of the 3TGs in our products; therefore, we cannot exclude the possibility that some may have originated in the Covered Countries. For that reason, we are required under the Rule to submit to the SEC a Conflict Minerals Report (“CMR”) as an Exhibit to Form SD.

#### 1. Company Overview

This report has been prepared by management of CUI Global, Inc. (herein referred to as “CUI Global,” the “Company,” “we,” “us,” or “our”). The information includes the activities of all owned subsidiaries that are required to be consolidated.

CUI Global, Inc. is a publicly traded company dedicated to maximizing shareholder value through the acquisition, development and commercialization of innovative companies, products and technologies. The Company's operations fall into two segments: Power and Electromechanical segment and Energy segment. The Power and Electromechanical segment through its CUI, Inc., CUI Japan and CUI-Canada subsidiaries, collectively “CUI,” provides electronic components including power supplies, transformers, converters, connectors and industrial controls for Original Equipment Manufacturers (OEMs). Since its inception in 1989, CUI has been delivering quality products, extensive application solutions and superior personal service. CUI's solid customer commitment and honest corporate message are a hallmark in the industry.

Our Energy segment consists of Orbital Gas Systems, Ltd., a U.K. Company and Orbital Gas Systems, North America, Inc. located in Houston, Texas. The Energy segment subsidiaries, collectively referred to as Orbital, have developed their portfolio of products, services and resources to offer a diverse range of personalized gas engineering solutions to the gas utilities, power generation, emissions, manufacturing and automotive industries.

#### 1.1 Products

The Power and Electromechanical segment aggregates its product offerings into two categories: **power solutions** - including external and embedded ac-dc power supplies, dc-dc converters and basic digital point of load modules and offering a technology architecture that addresses power and related accessories; and **components** - including connectors, speakers, buzzers, and industrial control solutions including encoders and sensors. These offerings provide a technology architecture that addresses power and related accessories to industries as broadly ranging as

telecommunications, consumer electronics, medical and defense.

In the Energy segment, Orbital's proprietary VE® Technology enhances the capability and speed of our GasPT® Technology. VE Technology provides a superior method of penetrating the gas flow without the associated vortex vibration, thereby making it a "stand-alone" product for thermal sensing (thermowells) and trace-element sampling.

For the purpose of this assessment, the products included above may contain or are likely to contain tin, tungsten, tantalum and gold, herein deemed the "Covered Products."

## 1.2 Supply Chain

CUI Global relies on its direct suppliers to provide information on the origin of the 3TGs contained in components and materials supplied to us. This includes the sources of 3TGs that are supplied to it from lower tier suppliers. We have an extensive supplier qualification and evaluation process which we have amended to include requirements for suppliers to provide information about 3TG sources. In addition, we have added a section to our terms and conditions that is printed on every Purchase Order. This addition states our expectation that the 3TGs used in the production of the products included in the Purchase Order are DRC Conflict-Free.

CUI Global requested CMRT forms from all product suppliers that provided products sold by CUI Global during the 2017 year.

## 1.3 Conflict Minerals Policy

In accordance with the OECD Guidance and the Conflict Minerals Rule, CUI Global's policy is publicly available on our website at: <http://www.cuiglobal.com/Conflict-Minerals/Index?KeyGenPage=1073750924>

## 2. Description of the RCOI:

CUI Global compiled this year's list by taking the 2016 final supplier list, which was already determined to be in scope with the assistance of Assent Compliance, and then CUI Global assessed all other suppliers who supplied materials for the Covered Products in 2017 and excluded those suppliers that met one or more of the following criteria:

- The company supplies CUI Global with packaging only (excluding labels);
- The company supplies CUI Global only with items that do not end up in CUI Global's products (including equipment used to make our products but not a part of the actual products themselves);
- The company is a test lab providing CUI Global with product testing only;
- The company is a service provider only; and
- The company has not supplied anything to CUI Global in the last two years.

This updated list was then provided to Assent Compliance, our third-party service provider, for upload to the Assent Compliance Manager tool ("ACM"). We deemed it impractical to filter this list further to exclude some possibly irrelevant suppliers because we could not determine definitively the presence or absence of conflict minerals in all parts supplied to CUI Global for our products.

Assent's use of the RBA-GeSI Conflict Minerals Reporting Template ("CMRT") version 5.0 or higher to conduct a survey of our suppliers allowed for some elimination of irrelevant suppliers. Specifically, Question 1 of the CMRT asks suppliers whether any of the conflict minerals they use are necessary to the functionality or production of their products. In addition, Assent conducted analysis on our supply chain to remove suppliers that met any of the out of scope criteria but had not been caught by the filters noted above.

CUI Global then conducted the supplier survey portion of the RCOI, using the CMRT. CUI Global contacted all in-scope suppliers via email and requested that they respond to the questions in the CMRT with respect to their sales to CUI Global. Once received, supplier CMRTs were uploaded to the Assent Compliance Manager to be evaluated for validation. The Assent Compliance Manager (ACM) is a software-as-a-service platform system tool that enables suppliers to upload completed CMRTs directly and permits Assent and CUI Global to track supplier communications, assess risk and manage the survey process generally. For this reporting year, Orbital and CUI - Canada, leveraged the use of the ACM and the services of Assent to complete multiple campaigns to their suppliers in order to collect, via the Assent Compliance supplier portal and via email reply, the CMRTs from their suppliers.

In its communications with suppliers, CUI Global provides training and education on how to complete the CMRT in order to alleviate any remaining confusion or questions with suppliers. CUI Global contacted nonresponsive suppliers in cases where contacts were incorrect and when suppliers required part-specific CMRTs. All email communications were monitored and tracked.

The CUI Global program continues to include automated data validation on all submitted CMRTs. The goal of data validation is to increase the accuracy of submissions and identify any contradictory answers in the CMRT. This data validation is based on:

- Questions 1 and 2 are minimum requirements for the CMRT
  - If suppliers state (via Q1 and Q2) that their products do not contain 3TGs necessary to the function or production of said products, then no further information is required and no further data validation is completed.
- Question 3 – Do any of your 3TGs originate from the covered countries?
  - Any supplier that has any 3TGs from the covered countries, even 1 positive response from their supply chain must answer yes.
- Question 4 – is 100% of the 3TG in question from a recycled source?
- Question 5 – Have you received info from all relevant 3TG Suppliers?
  - If you are not at 100%, then you can't make definitive statements for Questions 3, 4 and 6
- Question 6 – Have you identified all your Smelters and refiners?
  - If the answer here is yes, then question 5 must be yes. This also impacts question 3.

All submitted forms are accepted and classified as valid or invalid so that data is still retained. Suppliers are contacted in regards to invalid forms and are encouraged to resubmit a valid form. As of May 18<sup>th</sup>, 2018, there were 14 invalid supplier submissions that could not be corrected.

CUI Global conducted our RCOI in good faith to determine whether any of the 3TGs in our products originated in the DRC or an adjoining country (collectively referred to as the “Covered Countries”). Based on the RCOI, and in accordance with the Rule, CUI Global performed due diligence on the source and chain of custody of the 3TGs in question to determine whether these minerals financed or benefited armed groups.

### **3. Design of Due Diligence Process**

CUI Global's due diligence measures have been designed to conform, in all material respects, to the framework in The Organisation for Economic Co-operation and Development (“OECD”) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (“the Guidance”) and the related Supplements for gold, tin, tantalum and tungsten.

The Company's due diligence process for conflict minerals includes these five steps as defined by the Guidance.

- 1) Establish strong company management systems.
- 2) Identify and assess risks in our supply chain.
- 3) Design and implement a strategy to respond to identified risks.
- 4) Utilize independent third-party audits.
- 5) Publicly report on our supply chain due diligence.

A summary of the due diligence measures undertaken by the Company is outlined below.

### **3.1 Establish Strong Company Management Systems**

#### *Internal Team:*

CUI Global has established a management system for conflict minerals. The management system includes corporate officers as well as executive-level representatives and a team of subject matter experts from relevant functions.

The team of subject matter experts is responsible for implementing our conflict minerals compliance strategy and is led by the CUI Global Vice President of Operations who acts as the Conflict Minerals Program Manager. Senior management is briefed about the results of the due diligence efforts on a regular basis.

CUI Global also uses a third-party service provider, Assent Compliance, to assist with evaluating supply chain information regarding 3TGs and in the development and implementation of additional due diligence steps that we will undertake with suppliers in regards to conflict minerals.

#### *Control Systems:*

CUI Global expects all of its suppliers to have policies and procedures in place to ensure that any 3TGs used in the production of the products sold to CUI Global are DRC conflict-free. This means that the products must not contain 3TGs that directly or indirectly finance or benefit armed groups in the Covered Countries. CUI Global is actively working with its supply chain to do a Reasonable Country of Origin Inquiry (RCOI) while exercising due diligence by following the OECD Due Diligence Guidance.

Other controls include, but are not limited to, our Code of Conduct which outlines certain expected behaviors for all CUI Global employees. In addition, we rely on our direct suppliers to provide information on the origin of the 3TG contained in components and materials supplied to us – including sources of 3TG that are supplied to them from lower tier suppliers.

#### *Supplier Engagement:*

CUI Global engages with suppliers directly to request that they complete a valid CMRT for the products that they supply to the Company. With respect to the OECD requirement to strengthen engagement with suppliers, CUI Global has developed an internal procedure that includes steps of supplier engagement escalation such as in-person meetings and corrective actions. Feedback from this engagement has allowed CUI Global to oversee improvements in supplier responses and supplier compliance for this initiative. Additionally, CUI Global ensures that the Company's Conflict Minerals Policy is included in supplier contracts. The Company encourages and directs new suppliers to read and accept this policy.

#### *Grievance Mechanism:*

CUI Global has maintained a grievance mechanism that is explained in the Employee Manual as our "Whistleblower Policy." As this policy states, employees are free to raise concerns about misconduct or improper behavior that the employee reasonably and in good faith believes occurred. All concerns are communicated directly to Human Resources or a member of Executive Management. Concerns may also be submitted online, which are then sent to CUI Global's Audit Committee. Employees who disclose good faith beliefs and/or truthful information under this policy are protected from retaliation. All complaints are investigated promptly, including those that relate to conflict minerals and ethical sourcing violations.

#### *Maintain Records:*

CUI Global has adopted a policy to retain relevant documentation. Documentation will be retained for a period of 5 years.

### **3.2. Identify and Assess Risks in the Supply Chain**

Certain of the responses provided by suppliers to the CMRT included the names of facilities listed by the suppliers as smelters or refiners. We do not typically have a direct relationship with 3TG smelters and refiners and do not perform or direct audits of these entities within our supply chain. Assent compared these facilities listed in the responses to the list of smelters and refiners maintained by the Responsible Minerals Initiative ("RMI"), and if a supplier indicated that the facility was validated as having met the requirements of the Responsible Minerals Assurance Process (RMAP), we confirmed that the name was listed by RMI. As of May 18<sup>th</sup>, 2018, we have confirmed a total of 314 smelters or refiners used by CUI suppliers and we are working to validate the additional smelter/refiner entries from the submitted CMRTs. Due to the provision of primarily supplier-level CMRTs, CUI Global cannot definitively determine their connection to the Covered Products.

Based on the smelter lists provided by suppliers via the CMRTs, there are 255 smelters that are Compliant in accordance with the RMAP, 8 smelters that are Active (have started the process under the RMAP) and 51 that are Not Enrolled. Many suppliers are still unable to provide the smelters or refiners used for materials supplied to us. As a notable addition to this year's program, any suppliers who did not provide smelter or refiner information on their CMRT submission were flagged as invalid and contacted directly. Therefore, we have seen an increase in the number of suppliers who provided this information since the report for 2016.

In accordance with OECD Guidelines, it is important to understand risk levels associated with conflict minerals in the supply chain. Smelters or refiners not being certified DRC-Conflict Free pose a significant risk to the Supply Chain.

In accordance with OECD Guidance, it is important to understand risk levels associated with conflict minerals in the supply chain. The basis of this understanding stems from smelter or refiner information. Each facility that meets the RMI definition of a smelter or refiner of a 3TG mineral is assigned a risk of high, medium or low based on 3 scoring criteria:

1. Geographic proximity to the DRC and covered countries;
2. Responsible Minerals Assurance Process (RMAP) audit status;
3. Known or plausible evidence of unethical or conflict sourcing.

We also calculate overall supplier risk based on the risk ratings of the smelters declared by that supplier on their CMRT.

Additionally, suppliers are evaluated on program strength (further assisting in identifying risk in the supply chain). Evaluating and tracking the strength of the program meets the OECD Due Diligence Guidelines and can assist in making key risk mitigation decisions as the program progresses. The criteria used to evaluate the strength of the program are:

- A. Have you established a conflict minerals sourcing policy?
- E. Have you implemented due diligence measures for conflict-free sourcing?
- G. Do you review due diligence information received from your suppliers against your company's expectations?
- H. Does your review process include corrective action management?

When suppliers meet or exceed those criteria (Yes to at least A, E, G and H), they are deemed to have a strong program. When suppliers do not meet those criteria, they are deemed to have a weak program. As of May 18<sup>th</sup>, 2018, 65 suppliers have been identified as having a weak program.

We believe that the inquiries and investigations described above represent a reasonable effort to determine the mines or locations of origin of the 3TGs in our Covered Products, including the following steps taken:

- (1) seeking information about 3TG smelters and refiners in our supply chain through requesting that our suppliers complete the CMRT,
- (2) verifying those smelters and refiners with the expanding RMI lists,
- (3) conducting the due diligence review, and
- (4) obtaining additional documentation and verification, as applicable.

Our existing policy related to relevant documentation of our conflict mineral compliance process requires that documentation will be retained for a period of at least five years.



### **3.3. Design and Implement a Strategy to Respond to Identified Risks**

In response to this risk assessment, CUI Global has a risk management plan, through which the conflict minerals program is implemented, managed, and monitored. As the program progresses, escalations are sent to nonresponsive suppliers to outline the importance of a response via CMRTs and to outline the required cooperation for compliance to the Conflict Minerals rules.

We engage any of our suppliers whom we have reason to believe are supplying us with 3TGs from sources that may support conflict in the Covered Countries to establish an alternative source of 3TG that does not support such conflict, as provided in the OECD Guidance.

We continue to put a strong emphasis on supplier education and training. To accomplish this, we utilized Assent's learning management system, Assent University, and provided access to Assent's Conflict Minerals training course to all in-scope suppliers. This training is tracked and evaluated based on completion. All suppliers are encouraged to complete all modules within this course.

Based on these criteria the following facilities have been identified with red-flag risks in their supply chain:

- Tony Goetz NV - CID002587
- African Gold Refinery Limited (AGR) - CID003185
- Kaloti Precious Metals - CID002563
- Universal Precious Metals Refining Zambia - CID002854
- Fidelity Printers and Refiners - CID002515
- Sudan Gold Refinery - CID002567

When these facilities were reported on a CMRT by one of the suppliers surveyed, risk mitigation activities are initiated. Through our third-party vendor, submissions that include any of the above facilities immediately produce a receipt instructing the supplier to take their own risk mitigation actions, including submission of a product specific CMRT to better identify the connection to products that they supply to CUI, and escalating up to removal of these high-risk smelters from their supply chain.

As per the OECD Guidance, risk mitigation will depend on the supplier's specific context. Suppliers are given clear performance objectives within reasonable timeframes with the ultimate goal of progressive elimination of these risks from the supply chain. Furthermore, suppliers are guided to the Assent University learning platform to engage in educational materials on mitigating the risk of smelters or refiners on the supply chain.

### **3.4. Carry Out Independent Third-Party Audit**

CUI Global does not have a direct relationship with conflict minerals smelters or refiners and as a result, the Company does not perform direct audits of these entities in its supply chain.

### **3.5. Publicly Report on Supply Chain Due Diligence**

CUI Global reports annually on supply chain due diligence by filing a Form SD and Conflict Minerals Report with the SEC. This filing can be accessed via our website at: {<http://www.cuiglobal.com/Conflict-Minerals/Index?KeyGenPage=1073750924>}

## **4. Due Diligence Results**

### **4.1 Survey Responses**

As of May 18<sup>th</sup>, 2018, we received CMRTs from 79% of our surveyed, in-scope suppliers for the 2017 year. CUI Global and Assent reviewed the responses against criteria developed to determine which suppliers required further engagement. These criteria included untimely or incomplete responses as well as inconsistencies within the data reported in the CMRT. CUI Global worked directly with these suppliers to provide revised responses.

## 4.2 Efforts to Determine Mine or Location of Origin

Through requesting our suppliers to complete the CMRT, CUI Global and the third-party service provider has determined that seeking information about 3TG smelters and refiners in the supply chain represents the most reasonable effort that can be made to determine the mines or locations of origin of the 3TG in the supply chain.

## 4.3 Smelters or Refiner

The large majority of the supplier responses we received provided data at a company or divisional level. We are, therefore, unable to determine whether the 3TGs reported by the suppliers were contained in the actual components or parts supplied to us. Therefore, our list of processing SORs may contain more facilities than those that actually processed the Conflict Minerals contained in our products. The quality of the responses that we received from our surveyed suppliers continue to be varied. Many responses provided by suppliers (via the CMRT) included the names of facilities listed by the suppliers as smelters or refiners. The CMRTs submitted by suppliers that do not list at least 1 smelter for each 3TG claimed on the CMRT are considered invalid and our third-party provider follows up on these, urging suppliers to resubmit with increased smelter information. There are still suppliers unable to provide the smelters or refiners used for materials supplied to us.

From the responses that we received, we identified that of the 6 high-risk smelters or refiners, 5 appear in the CMRTs submitted by in-scope suppliers:

- Tony Goetz NV - CID002587
- Kaloti Precious Metals - CID002563
- Universal Precious Metals Refining Zambia - CID002854
- Fidelity Printers and Refiners - CID002515
- Sudan Gold Refinery - CID002567

As noted above, when these facilities were reported on a CMRT by one of the suppliers surveyed, risk mitigation activities are initiated. Through our third-party vendor, submissions that include any of the above facilities immediately produce a receipt instructing the supplier to take their own risk mitigation actions, including submission of a product specific CMRT to better identify the connection to products that they supply to CUI, and escalating up to removal of these high-risk smelters from their supply chain.

For all responses that indicated a smelter, our third-party consultant compared the facilities listed to the list of smelters maintained by the Responsible Minerals Initiative (“RMI”) If a supplier indicated that the facility was certified as “Conflict-Free,” Assent confirmed that the name was listed by RMI as a certified smelter. No violations were identified. As of May 18<sup>th</sup>, 2018, we have validated 314 smelters or refiners and we are working to validate the additional smelter/refiner entries from the submitted CMRTs. Appendix A lists the smelters and refiners that the suppliers we surveyed reported as being in their supply chains. We have not listed in Appendix A any smelters or refiners that we have not been able to validate. Appendix B includes an aggregated list of the countries of origin from which the reported facilities collectively source conflict minerals, based on information provided by suppliers and the RMI.

## 5. Steps to be taken to Mitigate Risk

CUI Global intends to take the following steps to improve the due diligence conducted to further mitigate any risk that the necessary 3TGs in our products could benefit armed groups in the DRC or adjoining countries:

- a) Continue to include a conflict minerals flow-down clause in new or renewed supplier contracts as well as include in the terms and conditions of each purchase order issued to CUI Global suppliers.
- b) Engage with suppliers and direct them to training resources to attempt to increase the response rate and improve the content of the suppliers’ survey responses.
- c) Include additional training for suppliers with a focus on providing accurate and complete smelter and refiner information
- d) Engage with any suppliers found to be supplying CUI Global with 3TGs from sources that support conflict in the DRC or any of the Covered Countries to establish an alternative source of 3TGs that does not support such conflict.

- e) Continue to engage with Assent Compliance and stay updated on OECD and relevant trade associations to define and improve best practices and build leverage over the supply chain in accordance with the OECD Guidance.
- f) Increase the emphasis on clean and validated smelter and refiner information from our supply chain as the list of conflict-free smelters and refiners grows and more smelters and refiners declare their intent to enroll in the program.

Suppliers will also be requested to inform CUI Global of the correlation between these smelters or refiners and the products and parts they supply to CUI Global.

#### Appendix A – List of Smelters and Refiners

This list includes all of the smelters and refiners listed by our suppliers in their completed CMRTs that appear on the lists of smelters maintained by the RMI. Since most of the CMRTs we received from our suppliers were made on a company or division-level basis, rather than on a product-level basis, we are not able to identify which smelters or refiners listed below actually processed the 3TGs contained in our products. Therefore, our list of processing smelters and refiners disclosed here may contain more facilities than those that actually processed the conflict minerals contained in our products.

| Metal | Standard Smelter Name   | Smelter Facility Location | Smelter ID |
|-------|---|---------------------------|------------|
| Gold  | Abington Reldan Metals, LLC                                   | UNITED STATES             | CID002708  |
| Gold  | Advanced Chemical Company                                     | UNITED STATES             | CID000015  |
| Gold  | Aida Chemical Industries Co., Ltd.                            | JAPAN                     | CID000019  |
| Gold  | Al Etihad Gold LLC  | UNITED ARAB EMIRATES      | CID002560  |
| Gold  | Allgemeine Gold-und Silberscheideanstalt A.G.                 | GERMANY                   | CID000035  |
| Gold  | Almalyk Mining and Metallurgical Complex (AMMC)               | UZBEKISTAN                | CID000041  |
| Gold  | AngloGold Ashanti Córrego do Sítio Mineração                  | BRAZIL                    | CID000058  |
| Gold  | Argor-Heraeus S.A.  | SWITZERLAND               | CID000077  |
| Gold  | Asahi Pretec Corp.  | JAPAN                     | CID000082  |
| Gold  | Asahi Refining Canada Ltd.                                    | CANADA                    | CID000924  |
| Gold  | Asahi Refining USA Inc.                                       | UNITED STATES             | CID000920  |
| Gold  | Asaka Riken Co., Ltd.   | JAPAN                     | CID000090  |
| Gold  | Atasay Kuyumculuk Sanayi Ve Ticaret A.S.                      | TURKEY                    | CID000103  |
| Gold  | AU Traders and Refiners                                       | SOUTH AFRICA              | CID002850  |
| Gold  | Aurubis AG  | GERMANY                   | CID000113  |
| Gold  | Bangalore Refinery  | INDIA                     | CID002863  |
| Gold  | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | PHILIPPINES               | CID000128  |
| Gold  | Boliden AB  | SWEDEN                    | CID000157  |
| Gold  | C. Hafner GmbH + Co. KG                                       | GERMANY                   | CID000176  |

|      |   |                      |           |
|------|---|----------------------|-----------|
| Gold | Caridad   | MEXICO               | CID000180 |
| Gold | CCR Refinery - Glencore Canada Corporation                      | CANADA               | CID000185 |
| Gold | Cendres + Métaux S.A.   | SWITZERLAND          | CID000189 |
| Gold | Chimet S.p.A.   | ITALY                | CID000233 |
| Gold | Chugai Mining   | JAPAN                | CID000264 |
| Gold | Daejin Indus Co., Ltd.  | KOREA, REPUBLIC OF   | CID000328 |
| Gold | Daye Non-Ferrous Metals Mining Ltd.                             | CHINA                | CID000343 |
| Gold | Degussa Sonne / Mond Goldhandel GmbH                            | GERMANY              | CID002867 |
| Gold | DODUCO Contacts and Refining GmbH                               | GERMANY              | CID000362 |
| Gold | Dowa  | JAPAN                | CID000401 |
| Gold | DSC (Do Sung Corporation)                                       | KOREA, REPUBLIC OF   | CID000359 |
| Gold | Eco-System Recycling Co., Ltd.                                  | JAPAN                | CID000425 |
| Gold | Elemetal Refining, LLC  | UNITED STATES        | CID001322 |
| Gold | Emirates Gold DMCC  | UNITED ARAB EMIRATES | CID002561 |
| Gold | Fidelity Printers and Refiners Ltd.                             | ZIMBABWE             | CID002515 |
| Gold | GCC Gujrat Gold Centre Pvt. Ltd.                                | INDIA                | CID002852 |
| Gold | Geib Refining Corporation                                       | UNITED STATES        | CID002459 |
| Gold | Gold Refinery of Zijin Mining Group Co., Ltd.                   | CHINA                | CID002243 |
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM                    | CHINA                | CID001909 |
| Gold | Guangdong Jinding Gold Limited                                  | CHINA                | CID002312 |
| Gold | Guoda Safina High-Tech Environmental Refinery Co., Ltd.         | CHINA                | CID000651 |
| Gold | Hangzhou Fuchunjiang Smelting Co., Ltd.                         | CHINA                | CID000671 |
| Gold | HeeSung   | KOREA, REPUBLIC OF   | CID000689 |
| Gold | Heimerle + Meule GmbH   | GERMANY              | CID000694 |
| Gold | Heraeus Metals Hong Kong Ltd.                                   | CHINA                | CID000707 |
| Gold | Heraeus Precious Metals GmbH & Co. KG                           | GERMANY              | CID000711 |
| Gold | Hunan Chenzhou Mining Co., Ltd.                                 | CHINA                | CID000767 |
| Gold | Hwasung CJ Co., Ltd.  | KOREA, REPUBLIC OF   | CID000778 |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | CHINA                | CID000801 |
| Gold | Ishifuku Metal Industry Co., Ltd.                               | JAPAN                | CID000807 |
| Gold | Istanbul Gold Refinery  | TURKEY               | CID000814 |
| Gold | Italpreziosi  | ITALY                | CID002765 |
| Gold | Japan Mint  | JAPAN                | CID000823 |
| Gold | Jiangxi Copper Co., Ltd.  | CHINA                | CID000855 |

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|------|---|----------------------|-----------|
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant | RUSSIAN FEDERATION   | CID000927 |
| Gold | JSC Uralelectromed                                  | RUSSIAN FEDERATION   | CID000929 |
| Gold | JX Nippon Mining & Metals Co., Ltd.                 | JAPAN                | CID000937 |
| Gold | Kaloti Precious Metals                              | UNITED ARAB EMIRATES | CID002563 |
| Gold | Kazakhmys Smelting LLC                              | KAZAKHSTAN           | CID000956 |
| Gold | Kazzinc   | KAZAKHSTAN           | CID000957 |
| Gold | Kennecott Utah Copper LLC                           | UNITED STATES        | CID000969 |
| Gold | KGHM Polska Miedz Spolka Akcyjna                    | POLAND               | CID002511 |
| Gold | Kojima Chemicals Co., Ltd.                          | JAPAN                | CID000981 |
| Gold | Korea Zinc Co., Ltd.                                | KOREA, REPUBLIC OF   | CID002605 |
| Gold | Kyrgyzaltyn JSC                                     | KYRGYZSTAN           | CID001029 |
| Gold | Kyshtym Copper-Electrolytic Plant ZAO               | RUSSIAN FEDERATION   | CID002865 |
| Gold | L'azurde Company For Jewelry                        | SAUDI ARABIA         | CID001032 |
| Gold | Lingbao Gold Co., Ltd.                              | CHINA                | CID001056 |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd.          | CHINA                | CID001058 |
| Gold | L'Orfebre S.A.                                      | ANDORRA              | CID002762 |
| Gold | LS-NIKKO Copper Inc.                                | KOREA, REPUBLIC OF   | CID001078 |
| Gold | Luoyang Zijin Yinhui Gold Refinery Co., Ltd.        | CHINA                | CID001093 |
| Gold | Marsam Metals                                       | BRAZIL               | CID002606 |
| Gold | Materion  | UNITED STATES        | CID001113 |
| Gold | Matsuda Sangyo Co., Ltd.                            | JAPAN                | CID001119 |
| Gold | Metalor Technologies (Hong Kong) Ltd.               | CHINA                | CID001149 |
| Gold | Metalor Technologies (Singapore) Pte., Ltd.         | SINGAPORE            | CID001152 |
| Gold | Metalor Technologies (Suzhou) Ltd.                  | CHINA                | CID001147 |
| Gold | Metalor Technologies S.A.                           | SWITZERLAND          | CID001153 |
| Gold | Metalor USA Refining Corporation                    | UNITED STATES        | CID001157 |
| Gold | Metalúrgica Met-Mex Peñoles S.A. De C.V.            | MEXICO               | CID001161 |
| Gold | Mitsubishi Materials Corporation                    | JAPAN                | CID001188 |
| Gold | Mitsui Mining and Smelting Co., Ltd.                | JAPAN                | CID001193 |
| Gold | MMTC-PAMP India Pvt., Ltd.                          | INDIA                | CID002509 |
| Gold | Modeltech Sdn Bhd                                   | MALAYSIA             | CID002857 |
| Gold | Morris and Watson                                   | NEW ZEALAND          | CID002282 |
| Gold | Morris and Watson Gold Coast                        | AUSTRALIA            | CID002866 |

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|------|---|--------------------|-----------|
| Gold | Moscow Special Alloys Processing Plant                                      | RUSSIAN FEDERATION | CID001204 |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.Ş.                                      | TURKEY             | CID001220 |
| Gold | Navoi Mining and Metallurgical Combinat                                     | UZBEKISTAN         | CID001236 |
| Gold | Nihon Material Co., Ltd.  | JAPAN              | CID001259 |
| Gold | Ögussa Österreichische Gold- und Silber-Scheideanstalt GmbH                 | AUSTRIA            | CID002779 |
| Gold | Ohura Precious Metal Industry Co., Ltd.                                     | JAPAN              | CID001325 |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | RUSSIAN FEDERATION | CID001326 |
| Gold | OJSC Novosibirsk Refinery   | RUSSIAN FEDERATION | CID000493 |
| Gold | PAMP S.A.   | SWITZERLAND        | CID001352 |
| Gold | Pease & Curren  | UNITED STATES      | CID002872 |
| Gold | Penglai Penggang Gold Industry Co., Ltd.                                    | CHINA              | CID001362 |
| Gold | Planta Recuperadora de Metales SpA  | CHILE              | CID002919 |
| Gold | Prioksky Plant of Non-Ferrous Metals  | RUSSIAN FEDERATION | CID001386 |
| Gold | PT Aneka Tambang (Persero) Tbk  | INDONESIA          | CID001397 |
| Gold | PX Précinox S.A.  | SWITZERLAND        | CID001498 |
| Gold | Rand Refinery (Pty) Ltd.  | SOUTH AFRICA       | CID001512 |
| Gold | Refinery of Seemine Gold Co., Ltd.  | CHINA              | CID000522 |
| Gold | Remondis Argentia B.V.  | NETHERLANDS        | CID002582 |
| Gold | Republic Metals Corporation   | UNITED STATES      | CID002510 |
| Gold | Royal Canadian Mint   | CANADA             | CID001534 |
| Gold | SAAMP   | FRANCE             | CID002761 |
| Gold | Sabin Metal Corp.   | UNITED STATES      | CID001546 |
| Gold | Safimet S.p.A   | Italy              | CID002973 |
| Gold | SAFINA A.S.   | CZECH REPUBLIC     | CID002290 |
| Gold | Sai Refinery  | INDIA              | CID002853 |
| Gold | Samduck Precious Metals   | KOREA, REPUBLIC OF | CID001555 |
| Gold | SAMWON Metals Corp.   | KOREA, REPUBLIC OF | CID001562 |
| Gold | SAXONIA Edelmetalle GmbH  | GERMANY            | CID002777 |
| Gold | Schone Edelmetaal B.V.  | NETHERLANDS        | CID001573 |
| Gold | SEMPSA Joyería Platería S.A.  | SPAIN              | CID001585 |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd.                     | CHINA              | CID001619 |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.                           | CHINA              | CID001622 |
| Gold | Sichuan Tianze Precious Metals Co., Ltd.                                    | CHINA              | CID001736 |

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| Gold     | Singway Technology Co., Ltd.   | TAIWAN             | CID002516 |
| Gold     | SOE Shyolkovsky Factory of Secondary Precious Metals                 | RUSSIAN FEDERATION | CID001756 |
| Gold     | Solar Applied Materials Technology Corp.                             | TAIWAN             | CID001761 |
| Gold     | State Research Institute Center for Physical Sciences and Technology | LITHUANIA          | CID003153 |
| Gold     | Sudan Gold Refinery  | SUDAN              | CID002567 |
| Gold     | Sumitomo Metal Mining Co., Ltd.                                      | JAPAN              | CID001798 |
| Gold     | SungEel HiTech   | KOREA, REPUBLIC OF | CID002918 |
| Gold     | T.C.A S.p.A  | ITALY              | CID002580 |
| Gold     | Tanaka Kikinzoku Kogyo K.K.  | JAPAN              | CID001875 |
| Gold     | The Refinery of Shandong Gold Mining Co., Ltd.                       | CHINA              | CID001916 |
| Gold     | Tokuriki Honten Co., Ltd.  | JAPAN              | CID001938 |
| Gold     | Tongling Nonferrous Metals Group Co., Ltd.                           | CHINA              | CID001947 |
| Gold     | Tony Goetz NV  | BELGIUM            | CID002587 |
| Gold     | TOO Tau-Ken-Altyn  | KAZAKHSTAN         | CID002615 |
| Gold     | Torecom  | KOREA, REPUBLIC OF | CID001955 |
| Gold     | Umicore Brasil Ltda.   | BRAZIL             | CID001977 |
| Gold     | Umicore Precious Metals Thailand                                     | THAILAND           | CID002314 |
| Gold     | Umicore S.A. Business Unit Precious Metals Refining                  | BELGIUM            | CID001980 |
| Gold     | United Precious Metal Refining, Inc.                                 | UNITED STATES      | CID001993 |
| Gold     | Universal Precious Metals Refining Zambia                            | ZAMBIA             | CID002854 |
| Gold     | Valcambi S.A.  | SWITZERLAND        | CID002003 |
| Gold     | Western Australian Mint trading as The Perth Mint                    | AUSTRALIA          | CID002030 |
| Gold     | WIELAND Edelmetalle GmbH   | GERMANY            | CID002778 |
| Gold     | Yamamoto Precious Metal Co., Ltd.                                    | JAPAN              | CID002100 |
| Gold     | Yokohama Metal Co., Ltd.   | JAPAN              | CID002129 |
| Gold     | Yunnan Copper Industry Co., Ltd.                                     | CHINA              | CID000197 |
| Gold     | Zhongyuan Gold Smelter of Zhongjin Gold Corporation                  | CHINA              | CID002224 |
| Tantalum | Asaka Riken Co., Ltd.  | JAPAN              | CID000092 |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd.                            | CHINA              | CID000211 |
| Tantalum | D Block Metals, LLC  | UNITED STATES      | CID002504 |
| Tantalum | Duoluoshan   | CHINA              | CID000410 |
| Tantalum | Exotech Inc.   | UNITED STATES      | CID000456 |
| Tantalum | F&X Electro-Materials Ltd.   | CHINA              | CID000460 |

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|----------|---|--------------------|-----------|
| Tantalum | FIR Metals & Resource Ltd.                        | CHINA              | CID002505 |
| Tantalum | Global Advanced Metals Aizu                       | JAPAN              | CID002558 |
| Tantalum | Global Advanced Metals Boyertown                  | UNITED STATES      | CID002557 |
| Tantalum | Guangdong Rising Rare Metals-EO Materials Ltd.    | CHINA              | CID000291 |
| Tantalum | Guangdong Zhiyuan New Material Co., Ltd.          | CHINA              | CID000616 |
| Tantalum | H.C. Starck Co., Ltd.                             | THAILAND           | CID002544 |
| Tantalum | H.C. Starck Hermsdorf GmbH                        | GERMANY            | CID002547 |
| Tantalum | H.C. Starck Inc.                                  | UNITED STATES      | CID002548 |
| Tantalum | H.C. Starck Ltd.                                  | JAPAN              | CID002549 |
| Tantalum | H.C. Starck Smelting GmbH & Co. KG                | GERMANY            | CID002550 |
| Tantalum | H.C. Starck Tantalum and Niobium GmbH             | GERMANY            | CID002545 |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd. | CHINA              | CID002492 |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd.      | CHINA              | CID002512 |
| Tantalum | Jiangxi Tuohong New Raw Material                  | CHINA              | CID002842 |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd.       | CHINA              | CID000914 |
| Tantalum | Jiujiang Tanbre Co., Ltd.                         | CHINA              | CID000917 |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd.     | CHINA              | CID002506 |
| Tantalum | KEMET Blue Metals                                 | MEXICO             | CID002539 |
| Tantalum | KEMET Blue Powder                                 | UNITED STATES      | CID002568 |
| Tantalum | King-Tan Tantalum Industry Ltd.                   | CHINA              | CID000973 |
| Tantalum | LSM Brasil S.A.                                   | BRAZIL             | CID001076 |
| Tantalum | Metallurgical Products India Pvt., Ltd.           | INDIA              | CID001163 |
| Tantalum | Mineracao Taboca S.A.                             | BRAZIL             | CID001175 |
| Tantalum | Mitsui Mining and Smelting Co., Ltd.              | JAPAN              | CID001192 |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd.        | CHINA              | CID001277 |
| Tantalum | NPM Silmet AS                                     | ESTONIA            | CID001200 |
| Tantalum | Power Resources Ltd.                              | MACEDONIA          | CID002847 |
| Tantalum | QuantumClean                                      | UNITED STATES      | CID001508 |
| Tantalum | Resind Industria e Comercio Ltda.                 | BRAZIL             | CID002707 |
| Tantalum | RFH Tantalum Smeltry Co., Ltd.                    | CHINA              | CID001522 |
| Tantalum | Solikamsk Magnesium Works OAO                     | RUSSIAN FEDERATION | CID001769 |
| Tantalum | Taki Chemicals                                    | JAPAN              | CID001869 |
| Tantalum | Telex Metals                                      | UNITED STATES      | CID001891 |
| Tantalum | Ulba Metallurgical Plant JSC                      | KAZAKHSTAN         | CID001969 |



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| Tantalum | XinXing HaoRong Electronic Material Co., Ltd.   | CHINA         | CID002508 |
| Tantalum | Yichun Jin Yang Rare Metal Co., Ltd.  | CHINA         | CID002307 |
| Tin      | Alpha   | UNITED STATES | CID000292 |
| Tin      | An Vinh Joint Stock Mineral Processing Company  | VIETNAM       | CID002703 |
| Tin      | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.                                     | CHINA         | CID000228 |
| Tin      | China Tin Group Co., Ltd.   | CHINA         | CID001070 |
| Tin      | CNMC (Guangxi) PGMA Co., Ltd.   | CHINA         | CID000278 |
| Tin      | CV Ayi Jaya   | INDONESIA     | CID002570 |
| Tin      | CV Dua Sekawan  | INDONESIA     | CID002592 |
| Tin      | CV Gita Pesona  | INDONESIA     | CID000306 |
| Tin      | CV Tiga Sekawan   | INDONESIA     | CID002593 |
| Tin      | CV United Smelting  | INDONESIA     | CID000315 |
| Tin      | CV Venus Inti Perkasa   | INDONESIA     | CID002455 |
| Tin      | Dowa  | JAPAN         | CID000402 |
| Tin      | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | VIETNAM       | CID002572 |
| Tin      | EM Vinto  | BOLIVIA       | CID000438 |
| Tin      | Estanho de Rondônia S.A.  | BRAZIL        | CID000448 |
| Tin      | Fenix Metals  | POLAND        | CID000468 |
| Tin      | Gejiu Fengming Metallurgy Chemical Plant  | CHINA         | CID002848 |
| Tin      | Gejiu Jinye Mineral Company   | CHINA         | CID002859 |
| Tin      | Gejiu Kai Meng Industry and Trade LLC   | CHINA         | CID000942 |
| Tin      | Gejiu Non-Ferrous Metal Processing Co., Ltd.  | CHINA         | CID000538 |
| Tin      | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.  | CHINA         | CID001908 |
| Tin      | Gejiu Zili Mining And Metallurgy Co., Ltd.  | CHINA         | CID000555 |
| Tin      | Guangdong Hanhe Non-ferrous Metal Limited Company                                     | CHINA         | CID003116 |
| Tin      | Guanyang Guida Nonferrous Metal Smelting Plant  | CHINA         | CID002849 |
| Tin      | HuiChang Hill Tin Industry Co., Ltd.  | CHINA         | CID002844 |
| Tin      | Huichang Jinshunda Tin Co., Ltd.  | CHINA         | CID000760 |
| Tin      | Jiangxi Ketai Advanced Material Co., Ltd.   | CHINA         | CID000244 |
| Tin      | Jiangxi New Nanshan Technology Ltd.   | CHINA         | CID001231 |
| Tin      | Magnu's Minerais Metais e Ligas Ltda.   | BRAZIL        | CID002468 |
| Tin      | Malaysia Smelting Corporation (MSC)   | MALAYSIA      | CID001105 |
| Tin      | Melt Metais e Ligas S.A.  | BRAZIL        | CID002500 |
| Tin      | Metallic Resources, Inc.  | UNITED STATES | CID001142 |

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| Tin | Metallo Belgium N.V.                             | BELGIUM     | CID002773 |
| Tin | Metallo Spain S.L.U.                             | SPAIN       | CID002774 |
| Tin | Mineracao Taboca S.A.                            | BRAZIL      | CID001173 |
| Tin | Minsur   | PERU        | CID001182 |
| Tin | Mitsubishi Materials Corporation                 | JAPAN       | CID001191 |
| Tin | Modeltech Sdn Bhd                                | MALAYSIA    | CID002858 |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company | VIETNAM     | CID002573 |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd.          | THAILAND    | CID001314 |
| Tin | O.M. Manufacturing Philippines, Inc.             | PHILIPPINES | CID002517 |
| Tin | Operaciones Metalurgical S.A.                    | BOLIVIA     | CID001337 |
| Tin | PT Aries Kencana Sejahtera                       | INDONESIA   | CID000309 |
| Tin | PT Artha Cipta Langgeng                          | INDONESIA   | CID001399 |
| Tin | PT ATD Makmur Mandiri Jaya                       | INDONESIA   | CID002503 |
| Tin | PT Babel Inti Perkasa                            | INDONESIA   | CID001402 |
| Tin | PT Bangka Prima Tin                              | INDONESIA   | CID002776 |
| Tin | PT Bangka Tin Industry                           | INDONESIA   | CID001419 |
| Tin | PT Belitung Industri Sejahtera                   | INDONESIA   | CID001421 |
| Tin | PT Bukit Timah                                   | INDONESIA   | CID001428 |
| Tin | PT DS Jaya Abadi                                 | INDONESIA   | CID001434 |
| Tin | PT Eunindo Usaha Mandiri                         | INDONESIA   | CID001438 |
| Tin | PT Inti Stania Prima                             | INDONESIA   | CID002530 |
| Tin | PT Karimun Mining                                | INDONESIA   | CID001448 |
| Tin | PT Kijang Jaya Mandiri                           | INDONESIA   | CID002829 |
| Tin | PT Lautan Harmonis Sejahtera                     | INDONESIA   | CID002870 |
| Tin | PT Menara Cipta Mulia                            | INDONESIA   | CID002835 |
| Tin | PT Mitra Stania Prima                            | INDONESIA   | CID001453 |
| Tin | PT O.M. Indonesia                                | INDONESIA   | CID002757 |
| Tin | PT Panca Mega Persada                            | INDONESIA   | CID001457 |
| Tin | PT Premium Tin Indonesia                         | INDONESIA   | CID000313 |
| Tin | PT Prima Timah Utama                             | INDONESIA   | CID001458 |
| Tin | PT Refined Bangka Tin                            | INDONESIA   | CID001460 |
| Tin | PT Sariwiguna Binasentosa                        | INDONESIA   | CID001463 |
| Tin | PT Stanindo Inti Perkasa                         | INDONESIA   | CID001468 |
| Tin | PT Sukses Inti Makmur                            | INDONESIA   | CID002816 |
| Tin | PT Sumber Jaya Indah                             | INDONESIA   | CID001471 |

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| Tin      | PT Timah (Persero) Tbk Kundur                      | INDONESIA          | CID001477 |
| Tin      | PT Timah (Persero) Tbk Mentok                      | INDONESIA          | CID001482 |
| Tin      | PT Tinindo Inter Nusa                              | INDONESIA          | CID001490 |
| Tin      | PT Tommy Utama                                     | INDONESIA          | CID001493 |
| Tin      | Resind Industria e Comercio Ltda.                  | BRAZIL             | CID002706 |
| Tin      | Rui Da Hung  | TAIWAN             | CID001539 |
| Tin      | Soft Metais Ltda.                                  | BRAZIL             | CID001758 |
| Tin      | Super Ligas  | BRAZIL             | CID002756 |
| Tin      | Thaisarco  | THAILAND           | CID001898 |
| Tin      | Tuyen Quang Non-Ferrous Metals Joint Stock Company | VIETNAM            | CID002574 |
| Tin      | White Solder Metalurgia e Mineração Ltda.          | BRAZIL             | CID002036 |
| Tin      | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.      | CHINA              | CID002158 |
| Tin      | Yunnan Tin Company Limited                         | CHINA              | CID002180 |
| Tungsten | A.L.M.T. TUNGSTEN Corp.                            | JAPAN              | CID000004 |
| Tungsten | ACL Metais Eireli                                  | BRAZIL             | CID002833 |
| Tungsten | Asia Tungsten Products Vietnam Ltd.                | VIETNAM            | CID002502 |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd.       | CHINA              | CID002513 |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd.               | CHINA              | CID000258 |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd.                   | CHINA              | CID000499 |
| Tungsten | Ganzhou Haichuang Tungsten Co., Ltd.               | CHINA              | CID002645 |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd.        | CHINA              | CID000875 |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd.            | CHINA              | CID002315 |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd.                 | CHINA              | CID002494 |
| Tungsten | Ganzhou Yatai Tungsten Co., Ltd.                   | CHINA              | CID002536 |
| Tungsten | Global Tungsten & Powders Corp.                    | UNITED STATES      | CID000568 |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd.               | CHINA              | CID000218 |
| Tungsten | H.C. Starck Smelting GmbH & Co.KG                  | GERMANY            | CID002542 |
| Tungsten | H.C. Starck Tungsten GmbH                          | GERMANY            | CID002541 |
| Tungsten | Hunan Chenzhou Mining Co., Ltd.                    | CHINA              | CID000766 |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji    | CHINA              | CID002579 |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd.        | CHINA              | CID000769 |
| Tungsten | Hunan Litian Tungsten Industry Co., Ltd.           | CHINA              | CID003182 |
| Tungsten | Hydrometallurg, JSC                                | RUSSIAN FEDERATION | CID002649 |
| Tungsten | Japan New Metals Co., Ltd.                         | JAPAN              | CID000825 |

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| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd.               | CHINA              | CID002551 |
| Tungsten | Jiangxi Dayu Longxintai Tungsten Co., Ltd.                    | CHINA              | CID002647 |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd.                            | CHINA              | CID002321 |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.         | CHINA              | CID002313 |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | CHINA              | CID002318 |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd.                  | CHINA              | CID002317 |
| Tungsten | Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd.          | CHINA              | CID002535 |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd.                           | CHINA              | CID002316 |
| Tungsten | Kennametal Fallon   | UNITED STATES      | CID000966 |
| Tungsten | Kennametal Huntsville   | UNITED STATES      | CID000105 |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd.                               | CHINA              | CID002319 |
| Tungsten | Moliren Ltd   | RUSSIAN FEDERATION | CID002845 |
| Tungsten | Niagara Refining LLC  | UNITED STATES      | CID002589 |
| Tungsten | Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC     | VIETNAM            | CID002543 |
| Tungsten | Philippine Chuangxin Industrial Co., Inc.                     | PHILIPPINES        | CID002827 |
| Tungsten | South-East Nonferrous Metal Company Limited of Hengyang City  | CHINA              | CID002815 |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd.                           | VIETNAM            | CID001889 |
| Tungsten | Unecha Refractory metals plant                                | RUSSIAN FEDERATION | CID002724 |
| Tungsten | Vietnam Youngsun Tungsten Industry Co., Ltd.                  | VIETNAM            | CID002011 |
| Tungsten | Wolfram Bergbau und Hütten AG                                 | AUSTRIA            | CID002044 |
| Tungsten | Woltech Korea Co., Ltd.                                       | KOREA, REPUBLIC OF | CID002843 |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd.                              | CHINA              | CID002320 |
| Tungsten | Xiamen Tungsten Co., Ltd.                                     | CHINA              | CID002082 |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.   | CHINA              | CID002830 |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd.                     | CHINA              | CID002095 |

#### Appendix B - Country of Origin List:

This list of potential countries of origin is populated based on publicly available information, our RCOI and due diligence. It is important to note that this is also based on company level responses and therefore, it is not certain which of these countries of origin can be linked to our products.

Argentina, Australia, Austria, Benin, Bolivia (Plurinational State of), Brazil, Burkina Faso, Burundi, Cambodia, Canada, Chile, China, Colombia, Congo, Democratic Republic of the, Ecuador, Eritrea, Ethiopia, France, Germany, Ghana, Guatemala, Guinea, Guyana, Honduras, India, Indonesia, Japan, Kazakhstan, Laos, Madagascar, Malaysia, Mali, Mexico, Mongolia, Mozambique, Myanmar, Namibia, Nicaragua, Nigeria, Panama, Peru, Portugal, Russian Federation, Rwanda, Senegal, Sierra Leone, South Africa, Spain, Thailand, Togo, Uganda, United Kingdom of Great Britain and Northern Ireland, United States of America, Uzbekistan, Vietnam, Zimbabwe

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