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

FORM SD Specialized Disclosure Report

FORD MOTOR COMPANY

(Exact name of registrant as specified in its charter)

Delaware

(State or other jurisdiction of incorporation)

<u>1-3950</u> 38-0549190 (Commission File Number) (IRS Employer Identification No.)

<u>One American Road, Dearborn, Michigan</u>
(Address of principal executive offices)

48126
(Zip Code)

Mary Ellen Bridges - (313) 322-3000 (Name and telephone number 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:

[X] Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2018.

Section 1 - Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report Item 1.02 Exhibit*

A copy of our Conflict Minerals Report is filed as Exhibit 1.01 and is publicly available at http://corporate.ford.com.

Section 2 - Exhibits

Item 2.01 Exhibits

<u>Designation</u> <u>Description</u> <u>Method of Filing</u>

Exhibit 1.01 Conflict Minerals Report Filed with this report

SIGNATURE

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.

FORD MOTOR COMPANY

(Registrant)

Date: May 24, 2019 By: /s/ Burt R. Jordan

Burt R. Jordan

Vice President, Global Vehicle Purchasing

^{*} Any reference in this Report or the attached exhibit(s) to our corporate website(s) and/or other social media sites or platforms, and the contents thereof, is provided for convenience only; such websites or platforms and the contents thereof are not incorporated by reference into this Report nor deemed filed with the Securities and Exchange Commission.

Ford Motor Company Conflict Minerals Report For The Year Ended December 31, 2018

Ford Motor Company is a global company based in Dearborn, Michigan. With about 199,000 employees worldwide as of December 31, 2018, the Company designs, manufactures, markets, and services a full line of Ford cars, trucks, sport utility vehicles, electrified vehicles, and Lincoln luxury vehicles. The principal products we sell are automobiles, automotive components, and service parts.

1. Overview

Since 2014, public companies in the United States have been required to conduct due diligence to determine the origin of conflict minerals in their products and to report annually with the Securities and Exchange Commission. The disclosure rules are intended to further the humanitarian goal of ending violent conflict in the Democratic Republic of the Congo and adjoining countries, collectively referred to as the "Covered Countries." The rules consider tin, tungsten, tantalum, and gold to be "conflict minerals" regardless from where they are sourced. We use the term "3TG" when discussing these minerals. By increasing the transparency of where 3TG is sourced from, the hope is that funds which otherwise might flow to armed groups that benefit from mineral trade in the Covered Countries will be redirected to responsible sources of 3TG both in the Covered Countries and other Conflict Affected and High-Risk Areas (CAHRA).

3TG is used in many auto parts and components, from engine assemblies to radio components. We work to ensure that the 3TG used in our vehicles is responsibly sourced. Ford defines responsible sources of 3TG as 3TG material that comes from a smelter or refiner that has been validated as conformant to (successfully completed) or is active in (currently participating) a 3rd party audit of their management systems and sourcing practices with the Responsible Minerals Assurance Process (RMAP), the London Bullion Market Association (LBMA), or the Responsible Jewelry Council (RJC) audit protocols. We encourage the use of responsibly sourced 3TG to support the development of a conflict-free 3TG mineral trade in the Covered Countries.

To help us achieve our goals and to comply with the relevant disclosure rules, the suppliers that provide us with components containing 3TG are expected to conduct due diligence to understand the origins of 3TG in their components, source 3TG responsibly (as described above), and not knowingly provide us with parts that contain 3TG that contributes to conflict. One of the best ways to provide transparency for the sources of 3TG is to disclose which 3TG smelters and refiners are reported by our supply chain. Smelters and refiners procure minerals that they process into usable metals. If our suppliers identify smelters or refiners that are not conformant to or active in a 3rd party responsible sourcing validation program, Ford asks suppliers to encourage the smelters or refiners to participate in RMAP or consider alternate sourcing arrangements.

Through our 2018 data collection and due diligence efforts described below, Ford has reason to believe some 3TG contained in our products may come from Covered Countries. Annex 1 to our report contains a list of confirmed smelters and refiners -- regardless of where they are located and regardless from where they sourced 3TG -- who were included in the reports submitted by our suppliers.

In this report, "Ford," the "Company," "we," "our," "us," or similar references mean Ford Motor Company, our consolidated subsidiaries, and our consolidated variable interest entities of which we are the primary beneficiary.

2. Reasonable Country of Origin Inquiry (RCOI)

We have instituted conflict minerals reporting requirements as part of our suppliers' contractual obligations through our Supplier Social Responsibility and Anti-Corruption Requirements Web-Guide, and we request our suppliers to extend the same obligations to their suppliers. Since we are layers removed from the smelters and refiners in our supply chain, we rely on our direct suppliers to survey their suppliers

who are expected to continue the cascade of reporting requirements until all information concerning the origin of the 3TG contained in the products they supply to us is identified. Our RCOI determination is based on information received from our in-scope suppliers and compared to the Responsible Minerals Initiative (RMI) RCOI database, which contains aggregated data on the origins of 3TG from RMAP and LBMA conformant smelters/refiners. In some cases, information provided by our in-scope suppliers may be incomplete or over inclusive resulting in missing or additional RCOI data determination. In most cases, our direct suppliers are unable to confirm 3TG country of origin information.

RCOI Approach

For reporting purposes, we required our in-scope direct suppliers to complete the conflict minerals reporting template (CMRT) designed by the Responsible Mineral Initiative and Global e-Sustainability Initiative. Suppliers can submit their completed CMRT via email or by uploading it to a specific website.

To determine our in-scope suppliers, we performed a risk-based assessment of all suppliers of components or parts to our plants based on expected spend and 3TG content as reported through the International Material Data System (IMDS). In aggregate, our in-scope suppliers represent over 80% of our direct expenditures for components or parts. Through our analysis, we can confirm that over 60,000 parts in our automobiles contain some level of 3TG content. 3TG materials are found in parts from all of our major commodity groups including interior, exterior, electrical, and powertrain components. Of our inscope parts, 99% contain tin, 11% contain tungsten, 17% contain tantalum, and 46% contain gold, with many parts containing more than one of the 3TG materials. All of our automobiles include components containing at least one 3TG material.

For 2018, Ford received responses from 100% of the in-scope suppliers surveyed. We continue to work with our suppliers to improve the quality and completeness of their reports, and we provide direct feedback to suppliers if their reports are incomplete, inconsistent with information previously reported through IMDS, and/or their CMRT contained smelters or refiners that are not identified as conformant to or active in the RMAP, LBMA, or RJC responsible sourcing validation programs. We also expanded our efforts to determine country of origin by sending a direct inquiry to smelters/refiners reported in our supply chain that were not identified on the RMI RCOI list. Additionally, our RCOI dataset was expanded in 2018 to include country of origin data provided by LBMA validated gold refiners. LBMA country of origin data is aggregated,i.e., not specific to an LBMA refiner, but could refer to any or all LBMA validated refiners.

3. Design of Due Diligence

Our due diligence measures have been designed to conform, in all material respects, with the 5-step framework in the <u>Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition, 2016 ("OECD Guidance") and the related supplements for 3TG.</u>

4. Due Diligence Measures Performed

4.1 Management Systems

Our conflict management system includes the following action:

- Established an Executive Steering Team for conflict minerals compliance led by our Vice President, Global Vehicle Purchasing. The team includes the following members:
 - · Chief Government Relations Officer
 - Chief Administrative Officer and General Counsel
 - Vice President, Sustainability, Environment and Safety Engineering
 - Chief Communications Officer
 - Vice President, Vehicle Component and System Engineering
 - Vice President and Controller
- Established a cross-functional working level team to manage conflict minerals compliance. The working level team met biweekly and held semiannual meetings with the Executive Steering Team to review our conflict minerals compliance status, strategy, continuous improvement objectives, performance to metrics, and legislative updates

- Developed training modules to ensure our suppliers understand our reporting and due diligence requirements and to assist them in their continuous improvement efforts to increase reporting transparency
- Instituted supplier report cards measuring conflict mineral reporting compliance
- Integrated supplier conflict minerals performance into sourcing decisions through the use of supplier report cards and regular business unit review with key suppliers
- Established and communicated our conflict minerals sourcing policy on our public website available by clicking here or http://corporate.ford.com
- Our conflict minerals policy is:

To the extent tin, tungsten, tantalum, and gold are contained in our products, it is Ford's goal to use DRC conflict free minerals while continuing to support responsible in-region mineral sourcing from the Democratic Republic of the Congo and adjoining countries. As defined in Rule 13p-1 of the Securities Exchange Act of 1934 (the "Rule"), "DRC conflict free" means that a product does not contain conflict minerals necessary to the functionality or production of that product that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or an adjoining country.

Our suppliers are expected to conduct due diligence to understand the source of the conflict minerals used in Ford products, source responsibly, and not knowingly provide products containing minerals that contribute to conflict as described in the Rule. Suppliers are required to comply with Ford's annual conflict minerals reporting requirements as published in our Social Responsibility and Anti-Corruption Requirements Web-Guide and are encouraged to source responsibly and use smelters and refiners that have been validated as conformant to or active in a 3rd party responsible mineral sourcing validation program.

- Instituted performance metrics to track the number of supplier responses received as well
 as the quality of the responses. The metrics are tracked and reported using our Business
 Plan Review process. The metrics are reported monthly to the Vice President, Global
 Vehicle Purchasing responsible for supply chain sustainability and are integrated into our
 human rights program
- Instituted conflict minerals reporting requirements as part of our suppliers' contractual obligations through our Supplier Social Responsibility and Anti-Corruption Requirements Web-Guide
- Developed and cascaded training materials to relevant employees outlining our supplier reporting requirements, reporting process, and time line
- Maintained the use of our publicly available compliance mobile app, The Right Way, that
 provides a convenient grievance mechanism for employees, suppliers, or other
 stakeholders to report concerns related to our conflict minerals program or any human
 rights issue from anywhere in the world. The app contains our policies and
 commitments to human rights. It is available twenty-four hours a day, seven days a week
 and is available in seven languages. Training is given to employees to make them aware
 of the app

4.2 Identify and Assess Risk in the Supply Chain

We reviewed in-scope supplier CMRTs for:

- Completion of all required reporting elements
- Consistency between the expected 3TG metals reported as being intentionally added to the supplier's products and the metals reported in IMDS
- Presence of a smelter/refiner list that includes expected metals based on IMDS reporting
- Suppliers' sub-tier response rate reported from each CMRT supplier survey

- Identification of smelter/refiners not participating in expected 3rd party validation programs reported in suppliers' supply chain
- Inclusion of conflict minerals policy that aligns to our conflict mineral expectations

We compared our suppliers' smelter/refiner lists to the RMI smelter database, and for those smelter/refiners that appear on both lists, we were able to determine their audit status and gained visibility to assess potential risk in our supply chain. The RMI RMAP, RJC, and LBMA use independent 3rd party risk-based approach audits to validate that smelters/refiners have carried out all 5-steps of the OECD Due Diligence Guidance framework.

We developed a database to aid in the analysis of supplier report data and to create tailored corrective actions to aid suppliers in improving the quality of their reports. We have dedicated resources and a cross-functional team managing our conflict mineral compliance and responsible sourcing efforts.

Although cobalt is not included in the definition of "conflict minerals," we expanded our risk assessment strategy to include initial due diligence on cobalt. In 2018, we requested cobalt refiners, complete a Smelter Identification Questionnaire (SIQ) and conducted outreach for cobalt refiners to participate in RMAP. Subsequently, we participated in the cobalt pilot initiated by RMI, through which we surveyed our strategic cobalt suppliers to complete the Cobalt Reporting Template (CRT), and received a 100% response rate. As a result of our CRT pilot participation, we provided input to RMI to improve the CRT template and advised on barriers to transparency in the cobalt supply chain.

4.3 Design and Implement a Strategy to Respond to Identified Risk

We have instituted the following process to respond to identified risks in the supply base:

- Established an escalation process to notify the Vice President, Global Vehicle Purchasing of risks when identified
- Established a procedure for risk mitigation including monitoring, tracking, and reporting progress to the Vice President. Global Vehicle Purchasing

As part of our risk mitigation process, entities that are reported by our suppliers but that have not been confirmed as a smelter or refiner are reported to RMI for validation and assessment. In 2018, if our suppliers' smelter lists contained smelters/refiners not identified on the RMI public "Conformant" or "Active" Smelter & Refiner RMAP lists, we immediately notified suppliers. We also directed the suppliers where to find the RMI "Conformant" and "Active" Smelter & Refiner information, encouraged our suppliers to complete outreach to their reported smelters/refiners, and/or consider alternate sourcing arrangements. This additional step resulted in a 4 percentage point increase of suppliers using only conformant/active smelters or refiners.

We are an active member of the RMI Smelter Disposition team in order to better understand requirements and processes of smelters/refiners as well as support research on any new smelters/refiners reported globally so they can be properly identified and engaged to complete RMAP. While we cross-recognize LBMA and RJC audit status we directly contact smelters and refiners to request their participation in the RMI RMAP.

We chair the AIAG Smelter Engagement Team (SET) on behalf of the North American Automotive Industry to lead and complete coordinated outreach directly to smelters/refiners. The AIAG SET team encourages non-participating RMAP smelter/refiners to become conformant to RMAP. The AIAG SET advocates for responsible sourcing by completing coordinated smelter or refiner outreach, and completing 3 pre-audit visits annually.

We are an active member of the Public Private Alliance for Responsible Minerals Trade (PPA). The PPA is a multi-sector initiative between leaders in civil society, industry, and the U.S. government that supports projects to improve the due diligence and governance systems needed

for ethical supply chains from the Covered Countries. Our membership fees as well as our active participation help to develop traceability solutions and build civil society capacity to participate in a regional traceability and certification mechanism to support responsibly sourced minerals sourcing and trade from the Covered Countries.

4.4 Carry Out Independent 3rd Party Audit of Smelter/Refiner's Due Diligence Practices

Due to our position in the supply chain, we rely on RMI to determine if smelters and refiners reported by our suppliers are conformant with RMAP, LBMA, and RJC third party audit protocols to validate responsible sourcing. These audit standards have been developed to assess if companies have management systems in place to support and implement due diligence and responsible sourcing practices. We are an active member of various RMI workgroups, and we contribute to the development of RMI tools and processes used to support our program. We use the RMI audit status database and RCOI information as key inputs to help us manage risk in our supply chain. In addition, we actively review and assess other information such as publicly available incident reports, NGO reports, and government published information to help us assess risk in the supply base.

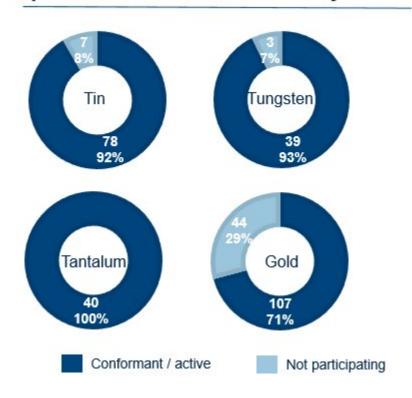
4.5 Report Annually on Supply Chain Due Diligence

This is our sixth Conflict Minerals Report and we plan to report annually. Our conflict minerals policy is available by clicking here and both our policy and our report are available on our website at http://corporate.ford.com. We also provide information regarding our conflict mineral disclosure and reporting in our Ford 2018-2019 Sustainability Report at www.sustainability.ford.com.

5. Facilities Used to Process the Conflict Minerals in Products, if Known

We have surveyed our in-scope suppliers in an effort to identify the facilities used to process the 3TG contained in our products. The majority of our in-scope suppliers, 67%, provided a company-level CMRT that does not identify the smelters or refiners used for a particular part, component, or business customer. In cases where suppliers provided a part-level report, the identification of the smelters and refiners that support our specific products could not be determined due to lower tier suppliers reporting on a company basis. Therefore, we are unable to identify with certainty the specific facilities used to process the 3TG in our products and whether the 3TG in our products is from recycled/scrap sources. By comparing our inscope suppliers' smelters/refiners lists to the RMI Smelter Database, 318 RMI eligible 3TG smelters/refiners were reported by our in-scope suppliers as shown in Annex 1. Overall, 83% of the 318 smelters and refiners are considered "responsible sources of 3TG." This was an improvement from 2017 in which 79% were considered "responsible sources of 3TG." The graphs below depict, by mineral, the number of smelters/refiners that are participating (conformant/active) and are not participating in the RMAP, LBMA, or RJC audit protocol.

Reported Conformant Smelters by Mineral



6. Country of Origin of the Conflict Minerals in Products, if Known

Through our leadership efforts as well as our due diligence actions, we have increased the transparency within our supply chain. In 2014, 41% of our in-scope suppliers provided a smelter/refiner list. In 2018, 68% of our in-scope suppliers provided a smelter/refiner list, allowing better determination of possible countries of origin and identification of facilities that process 3TG reported in our supply chain. We reviewed the RMI RCOI data against the 318 smelters/refiners reported in our supply chain to determine if any of our reported smelters/refiners sourced from the Covered Countries. We have reason to believe that 76 of the reported smelters/refiners may source directly from the Covered Countries, and an additional 28 smelters/refiners may indirectly source from the Covered Countries. All 104 of the smelters or refiners that have been identified as directly or indirectly sourcing from the Covered Countries were deemed conformant to the RMAP, LBMA, or RJC audit protocols as of December 31, 2018. In 2018, the country of origin data from LBMA validated gold refiners was included in the RMI RCOI data. This resulted in the identification of 2 additional "Covered Countries", Tanzania and Zambia, providing us with additional supply chain visibility.

Based on the information provided by our suppliers as well as from the RMI RCOI data that includes aggregated country of origin for RMAP and LBMA conformant processing facilities, we believe the countries of origin (COO) of 3TG contained in our products may include the following Covered Countries by mineral:

"Covered Countries"	Tin	Tungsten	Tantalum	Gold
Democratic Republic of the Congo	х	х	х	х
Burundi	х	х	х	
Rwanda	х	х	х	
Tanzania				х
Uganda	х			
Zambia				х

Using the same methodology, we believe the COO of 3TG contained in our products may also include the following countries:

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

7. Efforts to Determine the Mine or Location of Origin with the Greatest Possible Specificity

In an effort to determine the mine or location of origin of the 3TG in our products with the greatest possible specificity, we have taken the following actions:

- Conducted RCOI for suppliers whose parts contain 3TG and surveyed those suppliers using a risk-based approach
- Analyzed completed CMRTs from our suppliers for consistency with the 3TG content reported by suppliers in IMDS
- Analyzed completed CMRTs from our suppliers for completeness, consistency, and for identification of smelters/refiners sourcing conflict minerals from the Covered Countries
- Compared reports from our suppliers with the expected responses and when the information was incomplete or inconsistent with our conflict minerals policy or data expectations, we directly contacted our suppliers to obtain additional or clarifying information
- Assessed the information provided by our suppliers with the RMI members only smelter database to obtain country of origin information
- Requested country of origin information directly from non-participating smelters/refiners

8. Steps We Have Taken or Will Take, if Any, to Mitigate the Risk that Conflict Minerals in Our Products Benefit Armed Groups, Including Any Steps to Improve Our Due Diligence

Ford's policy is to source responsibly. We recognize, however, that strict avoidance of a given mineral or mineral origin could have unintended consequences, including the loss of livelihood for a local population. Ford supports responsible sourcing from the Covered Countries.

We review suppliers' conflict minerals policies for alignment with our expectations. When suppliers' policies indicate a ban on materials from the Covered Countries, we contact them to inform them of our expectation and the potential negative consequences of banning material from the Covered Countries.

Our goal is to improve the transparency of mineral sourcing within our supply chain while improving the capacity of smelters/refiners globally to ensure that 3TG originating from the Covered Countries does not fund armed groups or conflict in the area. We aim to increase all smelter/refiner participation in RMAP, LBMA, or RJC 3rd party validation programs to ensure responsible sourcing from the Covered Countries. Specifically, we set goals to: (i) obtain a 100% response rate from in-scope suppliers, (ii) increase the number of suppliers that provide a smelter list, (iii) increase our suppliers use of only responsible sources of 3TG so we can better determine COO and ensure responsible sourcing, and (iv) continuously improve our due diligence efforts. We have taken the following actions in support of these goals:

- We made conflict minerals reporting a contractual requirement for our suppliers and we encourage our suppliers to use audited DRC conflict free smelters and refiners
- We achieved a supplier conflict minerals reporting response rate of 100% for the fourth year in a row. We continue to work with our suppliers to improve the quality and completeness of their reports
- Our rate of suppliers who reported only using conformant or active smelters improved 4 percentage points compared to 2017
- Completed a direct inquiry to 52 non-participating smelters/refiners requesting country of
 origin of mined material, status of recycled scrap, and any due diligence validation
 information. Three smelters/refiners responded stating they do not source from Covered
 Countries. Of the three responses, two responses were from facilities that were nonconformant and one was a facility for which we completed outreach. Currently, Ford does not
 consider these smelters/refiners to be "responsible sources of 3TG"
- We directly contacted 43 smelters/refiners and encouraged them to participate in the RMI RMAP audit program. In addition, through the AIAG SET team, we led AIAG's coordinated industry outreach efforts to encourage smelter/refiner participation in RMI's audit program
- On behalf of AIAG, Ford completed a pre-audit visit to an outreach required tin smelter in Indonesia to support its participation in RMAP. The AIAG team completed 2 other pre-audit visits to another tin smelter (US) and gold refiner (Europe). All three smelters became active and/or conformant in 2018
- We participate in the AIAG Responsible Minerals Working Group to help scope the industry due diligence best practices
- We are an active member of RMI (member ID FORD) and participate in cross-industry smelter outreach efforts to identify true smelters and to encourage smelter participation in the RMAP
- We served on the RMI Steering Committee to provide downstream automotive perspective and guidance
- We actively participate in various RMI working groups including: Cobalt, Gold, Blockchain, SET, CMRT, Smelter disposition, Multi-stakeholder, Plenary, and Due Diligence Practices
- We served on the OECD Multi-Stakeholder Group as a representative of the automotive industry
- We attended the OECD conference on the Responsible Sourcing of Minerals
- In 2018, we continued our 6th year of membership in the Public Private Alliance for Responsible Mineral Trade (PPA), a multi-sector and multi-stakeholder initiative to support supply chain solutions to conflict minerals challenges in the Democratic Republic of the Congo and the Great Lakes Region of Central Africa. Our membership fees as well as our active participation and leadership (from 2013 to 2017, we served on the Governance Committee) have contributed to the following PPA grants aimed at improving conditions for miners and building capacity of conflict free minerals supply from the Covered Countries:
 - Provided financial support to IMPACT (formerly Partnership Africa Canada) to initiate due diligence systems in the Great Lakes Region of Central Africa
 - Provided funding to Save Act Mine to develop and distribute a graphic manual to educate miners, traders, and other upstream actors on the importance of due diligence
 - Provided a grant to IPIS to develop a model for gold trade monitoring in Mambasa
 - Provided funding, recruitment, and placement support to establish the International Conference of the Great Lakes Region (ICGLR) ombudsman for the ICGLR Regional Certification System

- Supported in-region alignment meetings along with ICGLR member states, civil society, and other supply chain actors to identify and resolve tough challenges related to conflict free minerals trade
- The responsible sourcing of raw materials (including 3TG) was identified as one of nine identified salient issues in our 2018 human rights saliency assessment conducted in line with the UN Guiding Principles Reporting Framework (UNGPRF). We will annually report progress to our actions through our Sustainability Report and the UN Guiding Principles Reporting Framework Index
- We conduct on-site 3rd party validated audits facilitated by the Responsible Business Alliance (RBA) to assess suppliers' performance to human rights, health and safety, and environmental expectations
- For the second year in a row, we issued over 500 supplier Self-Assessment Questionnaires (SAQs) to aid us in assessing risk in our supply chain. Responses to the SAQs served as one of several inputs into our risk assessment used to determine candidates for on-site supplier audits. The SAQ includes a conflict minerals provision that can be used to assess suppliers' Conflict Mineral policies and reporting who may not be in-scope for a particular Conflict Minerals Reporting Year
- · We participated in RMI's Cobalt Pilot
- We investigated the use of blockchain to help responsibly track cobalt throughout our value chain

Our Goals for 2019

- We plan to increase supplier engagement by developing risk ratings for supplier reported smelters/refiners. Our intent is to strengthen our 3TG responsible sourcing expectations towards the use of only conformant /active RMAP, LBMA, RJC smelters/refiners.
- Create a RMI eLearning curriculum for suppliers to enhance their due diligence efforts
- Investigate use of the RMI Risk Readiness Assessment as input to better understand the mineral producers and process smelters/refiners risk management practices and performance
- Develop strategy to integrate RMI CAHRA tool into risk assessment
- Participate in voluntary EU Conflict Mineral Disclosure
- Participate in an Independent Private Sector Assessment to benchmark our due diligence process
- Develop Responsible Sourcing Blockchain Network (RSBN) Minimal Viable Product with cross industry partners and other supply chain partners to improve traceability of responsible cobalt in our supply chain

<u>Metal</u>	Company Name	Smelter Country
Gold	8853 S.p.A.*	ITALY
Gold	Abington Reldan Metals, LLC	UNITED STATES OF AMERICA
Gold	Advanced Chemical Company*	UNITED STATES OF AMERICA
Gold	African Gold Refinery	UGANDA
Gold	Aida Chemical Industries Co., Ltd.*	JAPAN
Gold	Al Etihad Gold LLC*	UNITED ARAB EMIRATES
Gold	Allgemeine Gold-und Silberscheideanstalt A.G.*	GERMANY
Gold	Almalyk Mining and Metallurgical Complex	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	Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	TURKEY
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
Gold	Boliden AB*	SWEDEN
Gold	C. Hafner GmbH + Co. KG*	GERMANY
Gold	Caridad	MEXICO
Gold	CCR Refinery - Glencore Canada Corporation* Cendres + Metaux S.A.*	CANADA SMITZEDI AND
Gold Gold	Chimet S.p.A.*	SWITZERLAND ITALY
Gold	Chugai Mining**	JAPAN
Gold	Daejin Indus Co., Ltd.*	KOREA, REPUBLIC OF
Gold	Daye Non-Ferrous Metals Mining Ltd.	CHINA
Gold	Degussa Sonne / Mond Goldhandel GmbH	GERMANY
Gold	DODUCO Contacts and Refining GmbH*	GERMANY
Gold	Dowa*	JAPAN
Gold	DS PRETECH Co., Ltd.*	KOREA, REPUBLIC OF
Gold	DSC (Do Sung Corporation)*	KOREA, REPUBLIC OF
Gold	Eco-System Recycling Co., Ltd.*	JAPAN
Gold	Emirates Gold DMCC*	UNITED ARAB EMIRATES
Gold	Fidelity Printers and Refiners Ltd.	ZIMBABWE
Gold	GCC Gujrat Gold Centre Pvt. Ltd.	INDIA
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	Guangdong Jinding Gold Limited	CHINA
Gold	Guoda Safina High-Tech Environmental Refinery	CHINA
Gold	Hangzhou Fuchunjiang Smelting Co., Ltd.	CHINA
Gold	HeeSung Metal Ltd.*	KOREA, REPUBLIC OF
Gold	Heimerle + Meule GmbH*	GERMANY
Gold	Heraeus Metals Hong Kong Ltd.*	CHINA
Gold	Heraeus Precious Metals GmbH & Co. KG*	GERMANY
Gold Gold	Hunan Chenzhou Mining Co., Ltd.	CHINA
Gold Gold	Hunan Guiyang yinxing Nonferrous Smelting Co., HwaSeong CJ CO., LTD.	CHINA KOREA, REPUBLIC OF
Gold	Inner Mongolia Qiankun Gold and Silver Refinery	CHINA
Gold	Ishifuku Metal Industry Co., Ltd.*	JAPAN
Gold	Istanbul Gold Refinery*	TURKEY
Gold	Italpreziosi*	ITALY
Gold	Japan Mint*	JAPAN
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Gold	Jiangxi Copper Co., Ltd.*	CHINA
Gold	JSC Ekaterinburg Non-Ferrous Metal Processing	RUSSIAN FEDERATION
Gold	JSC Uralelectromed*	RUSSIAN FEDERATION
Gold	JX Nippon Mining & Metals Co., Ltd.*	JAPAN
Gold	Kaloti Precious Metals	UNITED ARAB EMIRATES
Gold	Kazakhmys Smelting LLC	KAZAKHSTAN
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
Gold	Korea Zinc Co., Ltd.*	KOREA, REPUBLIC OF
Gold	Kyrgyzaltyn JSC*	KYRGYZSTAN
Gold	Kyshtym Copper-Electrolytic Plant ZAO	RUSSIAN FEDERATION
Gold	L'azurde Company For Jewelry	SAUDI ARABIA
Gold	Lingbao Gold Co., Ltd.	CHINA
Gold	Lingbao Jinyuan Tonghui Refinery Co., Ltd.	CHINA
Gold	L'Orfebre S.A.*	ANDORRA
Gold	LS-NIKKO Copper Inc.*	KOREA, REPUBLIC OF
Gold	Luoyang Zijin Yinhui Gold Refinery Co., Ltd.	CHINA
Gold	Marsam Metals*	BRAZIL
Gold	Materion*	UNITED STATES OF AMERICA
Gold	Matsuda Sangyo Co., Ltd.*	JAPAN
Gold		CHINA
	Metalor Technologies (Hong Kong) Ltd.*	
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	Modeltech Sdn Bhd	MALAYSIA
Gold	Morris and Watson	NEW ZEALAND
Gold	Morris and Watson Gold Coast	AUSTRALIA
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	NH Recytech Company**	KOREA, REPUBLIC OF
Gold	Nihon Material Co., Ltd.*	JAPAN
Gold	Ogussa Osterreichische Gold- und Silber-	AUSTRIA
Gold	Ohura Precious Metal Industry Co., Ltd.*	JAPAN
Gold	OJSC "The Gulidov Krasnoyarsk Non-Ferrous	RUSSIAN FEDERATION
Gold	OJSC Novosibirsk Refinery*	RUSSIAN FEDERATION
Gold	PAMP S.A.*	SWITZERLAND
Gold	Pease & Curren	UNITED STATES OF AMERICA
Gold	Penglai Penggang Gold Industry Co., Ltd.	CHINA
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	QG Refining, LLC	UNITED STATES OF AMERICA
Gold	Rand Refinery (Pty) Ltd.*	SOUTH AFRICA
Gold	Refinery of Seemine Gold Co., Ltd.	CHINA
Gold	Remondis Argentia B.V.*	NETHERLANDS
Gold	Republic Metals Corporation*	UNITED STATES OF AMERICA
Gold	Royal Canadian Mint*	CANADA
Gold	SAAMP*	FRANCE
Gold	Sabin Metal Corp.	UNITED STATES OF AMERICA

Gold	Safimet S.p.A*	ITALY
Gold	SAFINA A.S.***	CZECH REPUBLIC
Gold	Sai Refinery	INDIA
Gold	Samduck Precious Metals*	KOREA, REPUBLIC OF
Gold	Samwon Metals Corp.	KOREA, REPUBLIC OF
Gold	SAXONIA Edelmetalle GmbH*	GERMANY
Gold	SEMPSA Joyeria Plateria S.A.*	SPAIN
Gold	•	CHINA
	Shandong Tiancheng Biological Gold Industrial Co.,	
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.*	CHINA
Gold	Shangdong Humon Smelting Co., Ltd.	CHINA
Gold	Sichuan Tianze Precious Metals Co., Ltd.*	CHINA
Gold	Singway Technology Co., Ltd.*	TAIWAN, PROVINCE OF CHINA
Gold	SOE Shyolkovsky Factory of Secondary Precious	RUSSIAN FEDERATION
Gold	Solar Applied Materials Technology Corp.*	TAIWAN, PROVINCE OF CHINA
Gold	State Research Institute Center for Physical	LITHUANIA
Gold	Sudan Gold Refinery	SUDAN
Gold	Sumitomo Metal Mining Co., Ltd.*	JAPAN
Gold	SungEel HiMetal Co., Ltd.*	KOREA, REPUBLIC OF
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	Tongling Nonferrous Metals Group Co., Ltd.	CHINA
Gold	Tony Goetz NV	BELGIUM
Gold	TOO Tau-Ken-Altyn	KAZAKHSTAN
Gold	Torecom*	KOREA, REPUBLIC OF
Gold	Umicore Brasil Ltda.*	BRAZIL
Gold	Umicore Precious Metals Thailand*	THAILAND
Gold	Umicore S.A. Business Unit Precious Metals	
		BELGIUM
Gold	United Precious Metal Refining, Inc.*	UNITED STATES OF AMERICA
Gold	Universal Precious Metals Refining Zambia	ZAMBIA
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	Yunnan Copper Industry Co., Ltd.	CHINA
Gold	Zhongyuan Gold Smelter of Zhongjin Gold	CHINA
Tantalum	Asaka Riken Co., Ltd.*	JAPAN
Tantalum	Changsha South Tantalum Niobium Co., Ltd.*	CHINA
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 Rising Rare Metals-EO Materials Ltd.*	CHINA
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 Smalling CombH & Co. KC*	JAPAN CEDMANY
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.,	CHINA
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.*	CHINA
Tantalum	Jiangxi Tuohong New Raw Material*	CHINA
Tantalum	Jiujiang Janny New Material Co., Ltd.*	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	KEMET Blue Powder*	UNITED STATES OF AMERICA
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
Taritalum	NEW SIMILET AS	
Tantalum	Power Resources Ltd.*	MACEDONIA, THE FORMER YUGOSLAV REPUBLIC OF
Tantalum	QuantumClean*	UNITED STATES OF AMERICA
Tantalum	Resind Industria e Comercio Ltda.*	BRAZIL
Tantalum	RFH Tantalum Smeltery Co., Ltd./Yanling Jincheng	CHINA
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
Tin	Alpha*	UNITED STATES OF AMERICA
Tin	•	VIETNAM
	An Vinh Joint Stock Mineral Processing Company	
Tin	Chenzhou Yunxiang Mining and Metallurgy Co.,	CHINA
Tin Tin	Chifeng Dajingzi Tin Industry Co., Ltd.*	CHINA
Tin Tin	China Tin Group Co., Ltd.*	CHINA
Tin	CV Ayi Jaya*	INDONESIA
Tin	CV Dua Sekawan*	INDONESIA
Tin	CV Gita Pesona*	INDONESIA
Tin	CV Tiga Sekawan*	INDONESIA
Tin	CV United Smelting*	INDONESIA
Tin	CV Venus Inti Perkasa*	INDONESIA
Tin —:	Dongguan CiEXPO Environmental Engineering	CHINA
Tin	Dowa*	JAPAN
Tin	Electro-Mechanical Facility of the Cao Bang	VIETNAM
Tin	Minerals & Metallurgy Joint Stock Company EM Vinto*	BOLIVIA (PLURINATIONAL STATE OF)
Tin	Estanho de Rondonia S.A.	BRAZIL
Tin	Fenix Metals*	POLAND
Tin	Gejiu Fengming Metallurgy Chemical Plant*	CHINA
Tin	Gejiu Jinye Mineral Company*	CHINA
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	•	CHINA
	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.*	CHINA
Tin Tin	Guanyang Guida Nonferrous Metal Smelting Plant* HuiChang Hill Tin Industry Co., Ltd.*	CHINA
Tin Tin	,	CHINA
Tin	Huichang Jinshunda Tin Co., Ltd.*	
Tin	Jiangxi Ketai Advanced Material Co., Ltd.*	CHINA
Tin Tin	Jiangxi New Nanshan Technology Ltd.*	CHINA
Tin Tin	Magnu's Minerais Metais e Ligas Ltda.*	BRAZIL MALAYSIA
Tin Tin	Malaysia Smelting Corporation (MSC)*	MALAYSIA
Tin	Melt Metais e Ligas S.A.*	BRAZIL
Tin	Metallic Resources, Inc.*	UNITED STATES OF AMERICA
Tin T i	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		VIETNAM
	Nghe Tinh Non-Ferrous Metals Joint Stock	
Tin	O.M. Manufacturing (Thailand) Co., Ltd.*	THAILAND
Tin	O.M. Manufacturing Philippines, Inc.*	PHILIPPINES
Tin T	Operaciones Metalurgical S.A.*	BOLIVIA (PLURINATIONAL STATE OF)
Tin	Pongpipat Company Limited	MYANMAR
Tin	PT Aries Kencana Sejahtera*	INDONESIA
Tin	PT Artha Cipta Langgeng*	INDONESIA
Tin	PT ATD Makmur Mandiri Jaya*	INDONESIA
Tin	PT Babel Inti Perkasa*	INDONESIA
Tin	PT Babel Surya Alam Lestari**	INDONESIA
Tin	PT Bangka Prima Tin*	INDONESIA
Tin	PT Bangka Serumpun*	INDONESIA
Tin	PT Bangka Tin Industry*	INDONESIA
Tin	PT Belitung Industri Sejahtera*	INDONESIA
Tin	PT Bukit Timah*	INDONESIA
Tin	PT DS Jaya Abadi*	INDONESIA
Tin	PT Inti Stania Prima*	INDONESIA
Tin	PT Karimun Mining*	INDONESIA
Tin	PT Kijang Jaya Mandiri*	INDONESIA
Tin	PT Lautan Harmonis Sejahtera*	INDONESIA
Tin	PT Menara Cipta Mulia*	INDONESIA
Tin	PT Mitra Stania Prima*	INDONESIA
Tin	PT Panca Mega Persada*	INDONESIA
Tin	PT Premium Tin Indonesia*	INDONESIA
Tin	PT Prima Timah Utama*	INDONESIA
Tin	PT Rajawali Rimba Perkasa**	INDONESIA
Tin		
	PT Refined Bangka Tin*	INDONESIA
Tin	PT Sariwiguna Binasentosa*	INDONESIA
Tin	PT Stanindo Inti Perkasa*	INDONESIA
Tin	PT Sukses Inti Makmur*	INDONESIA
Tin	PT Sumber Jaya Indah*	INDONESIA
Tin	PT Timah (Persero) Tbk Kundur*	INDONESIA
Tin	PT Timah (Persero) Tbk Mentok*	INDONESIA
Tin	PT Tinindo Inter Nusa*	INDONESIA
Tin	PT Tirus Putra Mandiri**	INDONESIA
Tin	PT Tommy Utama*	INDONESIA
Tin	Resind Industria e Comercio Ltda.*	BRAZIL
Tin	Rui Da Hung*	TAIWAN, PROVINCE OF CHINA
Tin	Soft Metais Ltda.*	BRAZIL
Tin	Super Ligas	BRAZIL
Tin	Thaisarco*	THAILAND
Tin	Tin Technology & Refining*	UNITED STATES OF AMERICA
Tin	Tuyen Quang Non-Ferrous Metals Joint Stock	VIETNAM
Tin	White Solder Metalurgia e Mineracao Ltda.*	BRAZIL
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.*	CHINA
Tin	Yunnan Tin Company Limited*	CHINA
Tungsten	A.L.M.T. TUNGSTEN Corp.*	JAPAN
Tungsten	ACL Metais Eireli*	BRAZIL
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.*	CHINA
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.*	CHINA
Tungsten	Fujian Jinxin Tungsten Co., Ltd.*	CHINA
Tungsten	Ganzhou Haichuang Tungsten Co., Ltd.*	CHINA
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
rangaten	Ciobal Tungoton a Lowdold Colp.	STATED 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.	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 Dayu Longxintai Tungsten Co., Ltd.	CHINA
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.*	CHINA
Tungsten	Jiangxi Minmetals Gao'an Non-ferrous Metals Co.,	CHINA
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical &	CHINA
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.*	CHINA
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.*	CHINA
Tungsten	Kennametal Fallon*	UNITED STATES OF AMERICA
Tungsten	Kennametal Huntsville*	UNITED STATES OF AMERICA
Tungsten	Malipo Haiyu Tungsten Co., Ltd.*	CHINA
Tungsten	Moliren Ltd.*	RUSSIAN FEDERATION
Tungsten	Niagara Refining LLC*	UNITED STATES OF AMERICA
Tungsten	Nui Phao H.C. Starck Tungsten Chemicals	VIETNAM
Tungsten	Philippine Chuangxin Industrial Co., Inc.*	PHILIPPINES
Tungsten	South-East Nonferrous Metal Company Limited of	CHINA
Tungsten	Tejing (Vietnam) Tungsten Co., Ltd.*	VIETNAM
Tungsten	Unecha Refractory metals plant*	RUSSIAN FEDERATION
Tungsten	Wolfram Bergbau und Hutten AG*	AUSTRIA
Tungsten	Woltech Korea Co., Ltd.*	KOREA, REPUBLIC OF
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.*	CHINA
Tungsten	Xiamen Tungsten Co., Ltd.*	CHINA
Tungsten	Xinfeng Huarui Tungsten & Molybdenum New	CHINA
Tungsten	Xinhai Rendan Shaoguan Tungsten Co., Ltd.*	CHINA

^{* &}quot;Conformant" indicates conformant to a 3rd Party Responsible Sourcing Validation Program (RMAP, LBMA, RJC) based on information provided to RMI member companies as of December 31, 2018.

^{** &}quot;Active" indicates actively participating in a 3rd Party Responsible Sourcing Validation Program (RMAP, LBMA, RJC) based on information provided to RMI member companies as of December 31, 2018.

^{***} Entity became an OFAC Specially Designated National (SDN) in April 2018. The reporting period includes sourcing that took place prior to the SDN designation.