

# MDU RESOURCES GROUP INC

## **FORM SD** (Specialized Disclosure Report)

Filed 05/25/17

|             |  |
|-------------|--|
| Address     | 1200 WEST CENTURY AVENUE<br>BISMARCK, ND 58503               |
| Telephone   | 701-530-1059   |
| CIK         | 0000067716   |
| Symbol      | MDU  |
| SIC Code    | 1400 - Mining & Quarrying of Nonmetallic Minerals (No Fuels) |
| Industry    | Multiline Utilities  |
| Sector      | Utilities  |
| Fiscal Year | 12/31  |

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

**FORM SD**

**SPECIALIZED DISCLOSURE REPORT**

**MDU Resources Group, Inc.**  
(Exact name of registrant as specified in its charter)

**Delaware**  
(State or other jurisdiction of  
incorporation)

**1-03480**  
(Commission File Number)

**41-0423660**  
(I.R.S. Employer Identification No.)

**1200 West Century Avenue  
P.O. Box 5650  
Bismarck, North Dakota 58506-5650**  
(Address of principal executive offices)  
(Zip Code)

**Doran N. Schwartz**  
**(701) 530-1750**  
(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, 2016.
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## **Section 1 - Conflict Minerals Disclosure**

### **Items 1.01 and 1.02 Conflict Minerals Disclosure and Report, Exhibit**

#### *Conflicts Minerals Disclosure*

A copy of MDU Resources Group, Inc.'s (the "Company's") Conflict Minerals Report for the 2016 reporting period is filed as Exhibit 1.01 hereto and is publicly available at [www.mdu.com/integrity/governance/conflictmineralsreport](http://www.mdu.com/integrity/governance/conflictmineralsreport). The content of the Company's website referred to in this Specialized Disclosure Report on Form SD is included for general information only and is not incorporated by reference into this Form SD.

## **Section 2 – Exhibits**

### **Item 2.01 Exhibits**

Exhibit 1.01 – Conflict Minerals Report as required by Items 1.01 and 1.02 of this Form SD.

**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.

Date: May 25, 2017

MDU RESOURCES GROUP, INC.

By: /s/ Doran N. Schwartz

Doran N. Schwartz

Vice President and

Chief Financial Officer

## EXHIBIT INDEX

| <u>Exhibit Number</u> | <u>Description of Exhibit</u>   |
|-----------------------|---|
| 1.01                  | Conflict Minerals Report as required by Items 1.01 and 1.02 of this Form. |

**MDU Resources Group, Inc.**  
**Conflict Minerals Report**  
**For The Year Ended December 31, 2016**

**Introduction**

This conflict minerals report (the “Report”) has been prepared pursuant to Rule 13p-1 under the Securities Exchange Act of 1934 (the “Rule”), for the reporting period from January 1 to December 31, 2016.

The Report relates to the process undertaken by MDU Resources Group, Inc. (herein referred to as “MDU Resources,” the “Company,” “we,” “us,” or “our”) with respect to products that were manufactured, or contracted to be manufactured, during calendar year 2016 and that contain cassiterite, columbite-tantalite, gold, wolframite, and their derivatives, which are limited to tin, tantalum, and tungsten for purposes of this Report (collectively, the “Conflict Minerals”).

Third-party products that we sell but do not manufacture or contract to manufacture are outside the scope of this Report.

**Company and Products Overview**

MDU Resources is a regulated energy delivery and construction materials and services company which operates in a number of business segments, including electric, natural gas distribution, pipeline and midstream, construction materials and contracting, and construction services.

The Company, through its wholly-owned subsidiary MDU Construction Services Group, Inc., (“MDU Construction Services”) provides utility construction services specializing in constructing and maintaining electric and communication lines, gas pipelines, fire suppression systems, and external lighting and traffic signalization. MDU Construction Services also provides utility excavation and inside electrical and mechanical services, and manufactures and distributes

transmission line construction equipment and supplies. The construction equipment that is manufactured by MDU Construction Services, through its wholly-owned subsidiary Wagner-Smith Equipment Co., includes electric transmission line pullers, tensioners, reel stands, reel carriers, and electric transmission pole and material trailers (the “Construction Equipment”).

Based upon our internal assessment, certain of the Construction Equipment products are the only products that are either manufactured or contracted to be manufactured by the Company and its subsidiaries which contain Conflict Minerals. Accordingly, for purposes of this Report, only the Construction Equipment products were considered.

### **Supply Chain Overview**

We have performed a detailed analysis of our Construction Equipment product components and the role that suppliers play throughout our manufacturing and product delivery processes. We do not purchase ore or unrefined Conflict Minerals directly from mines and we are many steps removed in the supply chain from the mining of the Conflict Minerals. Instead, the Company purchases materials used in our Construction Equipment from a large network of suppliers and some of those materials contribute necessary Conflict Minerals to certain of our products. The origin of the Conflict Minerals cannot be determined with any certainty once the raw ores are smelted, refined and converted to ingots, bullion or other Conflict Mineral containing derivatives. The smelters and refiners are the consolidating points for raw ore and are in the best position in the total supply chain to know the origins of the ores. We rely upon our suppliers to assist with our reasonable country of origin inquiry (“RCOI”) and due diligence efforts, including the identification of smelters and refiners in their respective supply chains, for the Conflict Minerals contained in the materials which they supply to us.

### **Conflict Minerals Program**

Our Conflict Minerals program has been developed in conformity with the Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Second Edition), and related Supplement on Tin, Tantalum and Tungsten and Supplement on Gold (collectively, the “OECD Guidance”), specifically as it relates to our position in the minerals supply chain as a “downstream” purchaser.

Our Conflict Minerals program includes components, summarized below, related to the five-step framework set forth in the OECD Guidance:

Management Systems

- MDU Resources maintains an internal “Conflict Minerals” team which is responsible for implementing and overseeing our Conflict Minerals compliance strategy. Our team includes individuals from relevant function areas including accounting, legal, finance and operations.
- We maintain a Conflict Minerals Policy, available on our website, pursuant to which we:
  1. Work closely with our suppliers to determine the potential use of Conflict Minerals in our supply chain and, when appropriate, work with them to remediate issues and source more responsibly.
  2. Expect our Conflict Minerals suppliers to conduct the necessary inquiry and, where appropriate, additional due diligence to provide us with confirmation of the source of the materials used in their processes and ultimately present in our manufactured products; and
  3. Encourage our suppliers to advocate and adhere to our philosophy of sourcing Conflict Minerals from socially responsible suppliers, including conflict-free mines in the Democratic Republic of the Congo or adjoining countries (collectively, the “Covered Countries”).
- Our employees, vendors, customers and other stakeholders may report any concerns relating to our Conflict Minerals program by telephone or online through our EthicsPoint system.

Identify and Assess Risks in Our Supply Chain

We have determined that seeking information about Conflict Minerals smelters and refiners in our supply chain from our suppliers represents the most reasonable effort we can make to determine the mines or location of origins of the Conflicts Minerals in our Construction Equipment. We



identify direct suppliers that supply products to us that may contain Conflict Minerals. We then survey those suppliers, requesting relevant information regarding the origins of Conflict Minerals used in the products they supply to us and the smelters and refiners used in connection with such Conflict Minerals. We follow up, by telephone and written correspondence, with those suppliers that do not respond by a specified date. We review the responses for completeness, request additional information as necessary, and request our suppliers to update the information provided as new information becomes available. We then compare the smelters and refiners identified in the supply chain survey against the list of facilities that have been designated “conflict-free” by the Conflict-Free Sourcing Initiative (“CFSI”) under its Conflict Free Smelter Program (the “CFSP”) and against the CFSI list of active facilities that have committed to undergo a CFSP audit. We rely on the CFSI to carry out smelter assessments and audits.

#### *Design and Implement a Strategy to Respond to Risks*

We encourage our suppliers to advocate and adhere to our philosophy of sourcing Conflict Minerals from socially responsible suppliers, including conflict-free mines, and support industry efforts to encourage smelters and refiners to seek “conflict-free” designation by the CFSI. We intend to work with suppliers who are sourcing minerals from non-conflict-free smelters and refiners to move towards using conflict-free facilities within a reasonable time frame. The time frame to work with suppliers on alternative sourcing will be dependent on the criticality of the specific part and the availability of alternative suppliers.

Risk management efforts are discussed by the Conflicts Mineral team and risk assessment updates are provided regularly to senior management.

#### *Report on Supply Chain Due Diligence*

MDU Resources makes its Conflicts Mineral Report available on its website at [www.mdu.com/integrity/governance/conflictmineralsreport](http://www.mdu.com/integrity/governance/conflictmineralsreport).

The content of our website referred to in this Report is included for general information only and is not incorporated by reference into this Report.

## **Reasonable Country of Origin Inquiry**

We have conducted a RCOI regarding the Conflict Minerals purchased by the Company that was reasonably designed to determine whether any such Conflict Minerals originated in the Covered Countries, or were from recycled or scrap sources. We identified 111 suppliers that provided components or engaged in manufacturing activities for use in our Construction Equipment products that may contain Conflict Minerals during calendar year 2016. In January 2017, we contacted these suppliers and provided them with a copy of our Conflict Minerals Policy, the CFSI Conflict Minerals Reporting Template (the “Template”) and an instructional letter to assist them in completing their responses. The Template includes questions regarding a supplier’s conflict-free policy, engagement with its direct suppliers, and a listing of the smelters and refiners the supplier and its suppliers use. In addition, the Template contains questions about the origin of Conflict Minerals included in the supplier’s products, as well as the supplier’s due diligence processes. We requested responses by April 1, 2017 and conducted follow-up by telephone and written correspondence with those suppliers that did not respond to the initial request.

Of the suppliers surveyed, 58% (64 suppliers) responded to our request for information. Based upon the results of our RCOI and due to numerous non-responsive suppliers, we cannot exclude the possibility that some of the Conflict Minerals used in our Construction Equipment products originated or may have originated in the Covered Countries and are not from recycled or scrap sources.

## **Design of Due Diligence**

Our Conflict Minerals due diligence measures have been designed to conform to the due diligence-related steps of the OECD Guidance, as applicable for a “downstream” purchaser.

## **Due Diligence Measures Performed**

Below is a description of the measures we performed to exercise due diligence on the source and chain of custody of the necessary Conflict Minerals contained in our Construction Equipment.

- We sent our suppliers a letter which included the Template and instructions and requested that they complete and return the Template.
- We requested that our suppliers adopt and communicate their Conflict Mineral policies and sourcing expectation to their suppliers and request that they complete the Template.
- We followed up by telephone and written correspondence with our suppliers that failed to complete and return the Template and solicited additional information.
- We reviewed all received supplier Templates for completeness. Suppliers that did not provide complete information or provided information that we identified as potentially inaccurate were requested to take corrective actions and update their Template responses.
- We compared smelters identified in supplier Templates against the list of smelters that have committed to undergo a CFSP audit and the list of smelters that have received a “conflict free” designation under the CFSP.

### **Due Diligence Results**

For reporting year 2016, we surveyed 111 suppliers of materials for our Construction Equipment using the Template. Of the suppliers surveyed, 58% (64 suppliers) responded to our request for information. We have relied on these suppliers' responses to provide us with information about the source of Conflict Minerals contained in the components supplied to us. Our direct suppliers are similarly reliant upon information provided by their suppliers.

As the result of our due diligence, we have gathered 644 smelter names from our supply chain. Of these, 246 have been designated as conflict-free compliant under the CFSP. An additional 13 are active facilities that have committed to undergo a CFSP audit. Of the remaining reported smelters, 359 have been determined to be legitimate processing facilities by the CFSI and have been allocated a Smelter Identification CID number. The final 26 are alleged smelters which have not yet been validated by CFSI.

We requested mine or location of origin information for the necessary Conflict Minerals from each of our suppliers using the Template. In some instances our suppliers reported name or location of mine. However, many of our suppliers were unable to obtain reliable mine or location of origin data for their necessary Conflict Minerals.

Two smelters, Phoenix Metal Ltd. and Universal Precious Metals Refining Zambia, were identified by some of our suppliers as having their location in a Covered Country. Neither smelter is currently listed as a compliant or active facility by the CFSI.

### **Determination**

Many of our suppliers were unable to represent to us that the Conflict Minerals from the entities they listed had actually been included in materials they supplied to us. In addition, many processing facilities were not validated as in fact being smelters or refiners. Therefore, based on the information provided by our suppliers, we have elected to present only the facility names recognized by the CFSI on Annex 1 and believe that these facilities may have been used to process the Conflict Minerals in our Construction Equipment.

Based on our due diligence efforts, we do not have sufficient information to conclusively determine the countries of origin of the Conflict Minerals in our Construction Equipment or whether the Conflict Minerals are from recycled or scrap sources. On the basis of the due diligence measures described in this Report, we have reason to believe that some of the Conflict Minerals used in our Construction Equipment products may have originated in the Covered Countries and are not from recycled or scrap sources, but we have not identified any instances in which our sourcing of necessary Conflict Minerals directly or indirectly financed or benefitted armed groups in the Covered Countries.

We have provided information as of the date of this Report. Subsequent events may affect our future determinations under the Rule.

### **Future Due Diligence Measures**

As we continue to enhance our due diligence program, we intend to take the following steps, among others, to continue to mitigate the risk that the necessary Conflict Minerals in our Construction Equipment could benefit armed groups in the Covered Countries:

- Track and add new suppliers to our Conflict Minerals program as they enter our supply chain;

- Drive our suppliers to obtain current, accurate and complete information about their smelters and refiners of Conflict Minerals;
- Continue to identify additional smelters and refiners and encourage them to obtain “conflict-free” designation; and
- Seek to obtain additional information about identified smelters and refiners not recognized by CFSI, for example by researching and reviewing news articles, facility websites or other public information, that may indicate where such smelters and refiners source their Conflict Minerals.

## ANNEX 1

| <b>Mineral</b> | <b>Smelter or Refiner Name</b>                                | <b>Country Location of Smelter/Refiner</b> |
|----------------|---|--|
| Gold           | A.L.M.T. TUNGSTEN Corp.                                       | JAPAN                                      |
| Gold           | Abington Reldan Metals, LLC                                   | UNITED STATES                              |
| Gold           | Advanced Chemical Company                                     | UNITED STATES                              |
| Gold           | Aida Chemical Industries Co., Ltd.                            | JAPAN                                      |
| Gold           | Aktyubinsk Copper Company TOO                                 | KAZAKHSTAN                                 |
| Gold           | Al Etihad Gold Refinery DMCC                                  | UNITED ARAB EMIRATES                       |
| Gold           | Allgemeine Gold-und Silberscheideanstalt A.G.                 | GERMANY                                    |
| Gold           | Almalyk Mining and Metallurgical Complex (AMMC)               | UZBEKISTAN                                 |
| Gold           | Alpha   | UNITED STATES                              |
| Gold           | AngloGold Ashanti Córrego do Sítio Mineração                  | 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                              |
| Gold           | Asaka Riken Co., Ltd.   | JAPAN                                      |
| Gold           | Atasay Kuyumculuk Sanayi Ve Ticaret A.S.                      | TURKEY                                     |
| Gold           | AU Traders and Refiners                                       | SOUTH AFRICA                               |
| Gold           | AURA-II   | UNITED STATES                              |
| Gold           | Aurubis AG  | GERMANY                                    |
| Gold           | Bangalore Refinery  | INDIA                                      |
| Gold           | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | PHILIPPINES                                |
| Gold           | Bauer Walser AG   | GERMANY                                    |
| Gold           | Boliden AB  | SWEDEN                                     |
| Gold           | C. Hafner GmbH + Co. KG                                       | GERMANY                                    |
| Gold           | Caridad   | MEXICO                                     |
| Gold           | CCR Refinery - Glencore Canada Corporation                    | CANADA                                     |
| Gold           | Cendres + Métaux S.A.   | SWITZERLAND                                |
| Gold           | Chimet S.p.A.   | ITALY                                      |
| Gold           | China National Gold Group Corporation                         | CHINA                                      |
| Gold           | China Tin Group Co., Ltd.                                     | CHINA                                      |
| Gold           | Chongyi Zhangyuan Tungsten Co., Ltd.                          | CHINA                                      |

|      |   |                      |
|------|---|----------------------|
| Gold | Chugai Mining                                 | JAPAN                |
| Gold | CNMC (Guangxi) PGMA Co., Ltd.                 | CHINA                |
| Gold | Codelco                                       | CHILE                |
| Gold | Colt Refining                                 | UNITED STATES        |
| Gold | Conghua Tantalum and Niobium Smeltry          | CHINA                |
| Gold | Cooperativa Metalurgica de Rondônia Ltda.     | BRAZIL               |
| Gold | CV Ayi Jaya                                   | INDONESIA            |
| Gold | CV Serumpun Sebalai                           | INDONESIA            |
| Gold | Daejin Indus Co., Ltd.                        | KOREA, REPUBLIC OF   |
| Gold | DaeryungENC                                   | KOREA, REPUBLIC OF   |
| Gold | Daye Non-Ferrous Metals Mining Ltd.           | CHINA                |
| Gold | Dayu Weiliang Tungsten Co., Ltd.              | CHINA                |
| Gold | DODUCO GmbH                                   | GERMANY              |
| Gold | Dowa  | JAPAN                |
| Gold | DSC (Do Sung Corporation)                     | KOREA, REPUBLIC OF   |
| Gold | Duoluoshan                                    | CHINA                |
| Gold | Eco-System Recycling Co., Ltd.                | JAPAN                |
| Gold | Elemetal Refining, LLC                        | UNITED STATES        |
| Gold | EM Vinto                                      | BOLIVIA              |
| Gold | Emirates Gold DMCC                            | UNITED ARAB EMIRATES |
| Gold | Exotech Inc.                                  | UNITED STATES        |
| Gold | F&X Electro-Materials Ltd.                    | CHINA                |
| Gold | Faggi Enrico S.p.A.                           | ITALY                |
| Gold | Feinhütte Halsbrücke GmbH                     | GERMANY              |
| Gold | Fenix Metals                                  | POLAND               |
| Gold | Fidelity Printers and Refiners Ltd.           | ZIMBABWE             |
| Gold | Gansu Seemine Material Hi-Tech Co., Ltd.      | CHINA                |
| Gold | Ganzhou Huaxing Tungsten Products Co., Ltd.   | CHINA                |
| Gold | Ganzhou Non-ferrous Metals Smelting Co., Ltd. | CHINA                |
| Gold | Ganzhou Seadragon W & Mo Co., Ltd.            | CHINA                |
| Gold | Geib Refining Corporation                     | UNITED STATES        |
| Gold | Gejiu Non-Ferrous Metal Processing Co., Ltd.  | CHINA                |
| Gold | Gejiu Zili Mining And Metallurgy Co., Ltd.    | CHINA                |
| Gold | Global Advanced Metals Boyertown              | UNITED STATES        |
| Gold | Global Tungsten & Powders Corp.               | UNITED STATES        |

|      |   |                      |
|------|---|----------------------|
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM                    | CHINA                |
| Gold | Guangdong Jinding Gold Limited                                  | CHINA                |
| Gold | Guangdong MingFa Precious Metal Co.,Ltd                         | CHINA                |
| Gold | Guangdong Xianglu Tungsten Co., Ltd.                            | CHINA                |
| Gold | Gujarat Gold Centre   | INDIA                |
| Gold | Guoda Safina High-Tech Environmental Refinery Co., Ltd.         | CHINA                |
| Gold | H.C. Starck GmbH  | GERMANY              |
| Gold | Hangzhou Fuchunjiang Smelting Co., Ltd.                         | CHINA                |
| Gold | Heimerle + Meule GmbH   | GERMANY              |
| Gold | Heraeus Ltd. Hong Kong  | CHINA                |
| Gold | Heraeus Precious Metals GmbH & Co. KG                           | GERMANY              |
| Gold | Hi-Temp Specialty Metals, Inc.                                  | UNITED STATES        |
| Gold | Hunan Chenzhou Mining Co., Ltd.                                 | CHINA                |
| Gold | Hwasung CJ Co., Ltd.  | KOREA, REPUBLIC OF   |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | CHINA                |
| Gold | Ishifuku Metal Industry Co., Ltd.                               | JAPAN                |
| Gold | Istanbul Gold Refinery  | TURKEY               |
| Gold | Japan Mint  | JAPAN                |
| Gold | Jiangxi Copper Co., Ltd.  | CHINA                |
| Gold | Jiangxi Ketai Advanced Material Co., Ltd.                       | CHINA                |
| Gold | JiuJiang JinXin Nonferrous Metals Co., Ltd.                     | CHINA                |
| Gold | Jiujiang Tanbre Co., Ltd.                                       | CHINA                |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant             | 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 | KEMET Blue Powder   | UNITED STATES        |
| Gold | Kennametal Huntsville   | UNITED STATES        |
| Gold | Kennecott Utah Copper LLC                                       | UNITED STATES        |
| Gold | KGHM Polska Miedź Spółka Akcyjna                                | POLAND               |
| Gold | Kojima Chemicals Co., Ltd.                                      | JAPAN                |
| Gold | Korea Metal Co., Ltd.   | KOREA, REPUBLIC OF   |
| 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 | Linwu Xianggui Ore Smelting Co., Ltd.        | CHINA              |
| Gold | LS-NIKKO Copper Inc.                         | KOREA, REPUBLIC OF |
| Gold | Luoyang Zijin Yinhui Gold Refinery Co., Ltd. | CHINA              |
| Gold | Malaysia Smelting Corporation (MSC)          | MALAYSIA           |
| Gold | Materion                                     | UNITED STATES      |
| Gold | Matsuda Sangyo Co., Ltd.                     | JAPAN              |
| Gold | Metahub Industries Sdn. Bhd.                 | MALAYSIA           |
| Gold | Metallic Resources, Inc.                     | UNITED STATES      |
| Gold | Metallo-Chimique N.V.                        | BELGIUM            |
| Gold | Metallurgical Products India Pvt., Ltd.      | INDIA              |
| Gold | Metalor Technologies (Hong Kong) Ltd.        | CHINA              |
| Gold | Metalor Technologies (Singapore) Pte., Ltd.  | SINGAPORE          |
| Gold | Metalor Technologies (Suzhou) Ltd.           | CHINA              |
| Gold | Metalor Technologies S.A.                    | SWITZERLAND        |
| Gold | Metalor USA Refining Corporation             | UNITED STATES      |
| Gold | Metalúrgica Met-Mex Peñoles S.A. De C.V.     | MEXICO             |
| Gold | Minsur                                       | PERU               |
| Gold | Mitsubishi Materials Corporation             | JAPAN              |
| Gold | Mitsui Mining & Smelting                     | JAPAN              |
| Gold | Mitsui Mining and Smelting Co., Ltd.         | JAPAN              |
| Gold | MMTC-PAMP India Pvt., Ltd.                   | INDIA              |
| Gold | Modeltech Sdn Bhd                            | MALAYSIA           |
| Gold | Molycorp Silmet A.S.                         | ESTONIA            |
| Gold | Morris and Watson                            | NEW ZEALAND        |
| Gold | Moscow Special Alloys Processing Plant       | RUSSIAN FEDERATION |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.Ş.       | TURKEY             |
| Gold | Nankang Nanshan Tin Manufactory Co., Ltd.    | CHINA              |
| Gold | Navoi Mining and Metallurgical Combinat      | UZBEKISTAN         |
| Gold | Nihon Material Co., Ltd.                     | JAPAN              |
| Gold | Ningxia Orient Tantalum Industry Co., Ltd.   | CHINA              |

|      |   |                    |
|------|---|--------------------|
| Gold | Novosibirsk Processing Plant Ltd.   | RUSSIAN FEDERATION |
| Gold | Ögussa Österreichische Gold- und Silber-Scheideanstalt GmbH                 | AUSTRIA            |
| Gold | Ohura Precious Metal Industry Co., Ltd.                                     | JAPAN              |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | RUSSIAN FEDERATION |
| Gold | OJSC Kolyma Refinery  | RUSSIAN FEDERATION |
| Gold | OJSC Novosibirsk Refinery   | RUSSIAN FEDERATION |
| Gold | Operaciones Metalurgical S.A.   | BOLIVIA            |
| Gold | PAMP S.A.   | SWITZERLAND        |
| Gold | Penglai Penggang Gold Industry Co., Ltd.                                    | CHINA              |
| Gold | Plansee SE Liezen   | AUSTRIA            |
| Gold | Prioksky Plant of Non-Ferrous Metals  | RUSSIAN FEDERATION |
| Gold | PT Alam Lestari Kencana   | INDONESIA          |
| Gold | PT Aneka Tambang (Persero) Tbk  | INDONESIA          |
| Gold | PT Aries Kencana Sejahtera  | INDONESIA          |
| Gold | PT Artha Cipta Langgeng   | INDONESIA          |
| Gold | PT Babel Inti Perkasa   | INDONESIA          |
| Gold | PT Bangka Kudai Tin   | INDONESIA          |
| Gold | PT Bangka Putra Karya   | INDONESIA          |
| Gold | PT Bangka Timah Utama Sejahtera   | INDONESIA          |
| Gold | PT Belitung Industri Sejahtera  | INDONESIA          |
| Gold | PT BilliTin Makmur Lestari  | INDONESIA          |
| Gold | PT Bukit Timah  | INDONESIA          |
| Gold | PT DS Jaya Abadi  | INDONESIA          |
| Gold | PT Eunindo Usaha Mandiri  | INDONESIA          |
| Gold | PT Fang Di MulTindo   | INDONESIA          |
| Gold | PT Justindo   | INDONESIA          |
| Gold | PT Mitra Stania Prima   | INDONESIA          |
| Gold | PT Panca Mega Persada   | INDONESIA          |
| Gold | PT Pelat Timah Nusantara Tbk  | INDONESIA          |
| Gold | PT Refined Bangka Tin   | INDONESIA          |
| Gold | PT Sariwiguna Binasentosa   | INDONESIA          |
| Gold | PT Stanindo Inti Perkasa  | INDONESIA          |
| Gold | PT Sumber Jaya Indah  | INDONESIA          |
| Gold | PT Timah (Persero) Tbk Kundur   | INDONESIA          |
| Gold | PT Timah (Persero) Tbk Mentok   | INDONESIA          |

|      |   |                    |
|------|---|--------------------|
| Gold | PT Tinindo Inter Nusa                                   | INDONESIA          |
| Gold | PX Précinox S.A.  | SWITZERLAND        |
| Gold | Qiankun Gold and Silver                                 | CHINA              |
| Gold | Rand Refinery (Pty) Ltd.                                | SOUTH AFRICA       |
| Gold | Remondis Argentia B.V.                                  | NETHERLANDS        |
| Gold | Republic Metals Corporation                             | UNITED STATES      |
| Gold | RFH Tantalum Smeltry Co., Ltd.                          | CHINA              |
| Gold | Royal Canadian Mint                                     | CANADA             |
| Gold | SAAMP   | FRANCE             |
| Gold | Sabin Metal Corp.                                       | UNITED STATES      |
| 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 | Schone Edelmetaal B.V.                                  | NETHERLANDS        |
| Gold | SEMPSA Joyería Platería S.A.                            | SPAIN              |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | CHINA              |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.       | CHINA              |
| Gold | Shenzhen FuJun Material Technology CO.LTD               | CHINA              |
| Gold | Sichuan Tianze Precious Metals Co., Ltd.                | CHINA              |
| Gold | Singway Technology Co., Ltd.                            | TAIWAN             |
| Gold | So Accurate Group, Inc.                                 | UNITED STATES      |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals    | RUSSIAN FEDERATION |
| Gold | Soft Metais Ltda.                                       | BRAZIL             |
| Gold | Solar Applied Materials Technology Corp.                | TAIWAN             |
| Gold | Sudan Gold Refinery                                     | SUDAN              |
| Gold | Sumitomo Metal Mining Co., Ltd.                         | JAPAN              |
| Gold | T.C.A S.p.A   | ITALY              |
| Gold | Tanaka Kikinzoku Kogyo K.K.                             | JAPAN              |
| Gold | Thaisarco   | THAILAND           |
| 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            |

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| 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 Refining           | BELGIUM            |
| Gold     | United Precious Metal Refining, Inc.                          | UNITED STATES      |
| Gold     | Universal Precious Metals Refining Zambia                     | ZAMBIA             |
| Gold     | Valcambi S.A.   | SWITZERLAND        |
| Gold     | Western Australian Mint trading as The Perth Mint             | AUSTRALIA          |
| Gold     | WIELAND Edelmetalle GmbH                                      | GERMANY            |
| Gold     | Xiamen Tungsten Co., Ltd.                                     | CHINA              |
| Gold     | Yamamoto Precious Metal Co., Ltd.                             | JAPAN              |
| Gold     | Yokohama Metal Co., Ltd.                                      | JAPAN              |
| Gold     | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.                 | CHINA              |
| Gold     | Yunnan Copper Industry Co., Ltd.                              | CHINA              |
| Gold     | Yunnan Tin Group (Holding) Company Limited                    | CHINA              |
| Gold     | Zhongyuan Gold Smelter of Zhongjin Gold Corporation           | CHINA              |
| Gold     | Zijin Mining Group Co., Ltd. Gold Refinery                    | CHINA              |
| Tantalum | A.L.M.T. TUNGSTEN Corp.                                       | JAPAN              |
| Tantalum | Almalyk Mining and Metallurgical Complex (AMMC)               | UZBEKISTAN         |
| Tantalum | Alpha   | UNITED STATES      |
| Tantalum | AngloGold Ashanti Córrego do Sítio Mineração                  | BRAZIL             |
| Tantalum | Argor-Heraeus SA  | SWITZERLAND        |
| Tantalum | Asahi Pretec Corporation                                      | JAPAN              |
| Tantalum | Asahi Refining USA Inc.                                       | UNITED STATES      |
| Tantalum | Atasay Kuyumculuk Sanayi Ve Ticaret A.S.                      | TURKEY             |
| Tantalum | Avon Specialty Metals Ltd                                     | UNITED KINGDOM     |
| Tantalum | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | PHILIPPINES        |
| Tantalum | Boliden AB  | SWEDEN             |
| Tantalum | CCR Refinery - Glencore Canada Corporation                    | CANADA             |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd.                     | CHINA              |
| Tantalum | Chongyi Zhangyuan Tungsten Co., Ltd.                          | CHINA              |
| Tantalum | Conghua Tantalum and Niobium Smeltry                          | CHINA              |
| Tantalum | D Block Metals, LLC   | UNITED STATES      |
| Tantalum | Dayu Weiliang Tungsten Co., Ltd.                              | CHINA              |

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| Tantalum | Dowa   | JAPAN         |
| Tantalum | Duoluoshan   | CHINA         |
| Tantalum | E.S.R. Electronics                                   | UNITED STATES |
| Tantalum | EM Vinto   | BOLIVIA       |
| Tantalum | Exotech Inc.   | UNITED STATES |
| Tantalum | F&X Electro-Materials Ltd.                           | CHINA         |
| Tantalum | FIR Metals & Resource Ltd.                           | CHINA         |
| Tantalum | Fujian Jinxin Tungsten Co., Ltd.                     | CHINA         |
| Tantalum | Ganzhou Huaxing Tungsten Products Co., Ltd.          | CHINA         |
| Tantalum | Ganzhou Non-ferrous Metals Smelting Co., Ltd.        | CHINA         |
| Tantalum | Ganzhou Seadragon W & Mo Co., Ltd.                   | CHINA         |
| Tantalum | Gejiu Zili Mining And Metallurgy Co., Ltd.           | CHINA         |
| Tantalum | Global Advanced Metals                               | UNITED STATES |
| Tantalum | Global Advanced Metals Aizu                          | JAPAN         |
| Tantalum | Global Advanced Metals Boyertown                     | UNITED STATES |
| Tantalum | Guangdong Xianglu Tungsten Co., Ltd.                 | CHINA         |
| Tantalum | Guangdong Zhiyuan New Material Co., Ltd.             | CHINA         |
| Tantalum | Guizhou Zhenhua Xinyun Technology Ltd., Kaili branch | CHINA         |
| Tantalum | H.C. Starck Co., Ltd.                                | THAILAND      |
| Tantalum | H.C. Starck GmbH                                     | GERMANY       |
| Tantalum | H.C. Starck GmbH Goslar                              | GERMANY       |
| Tantalum | H.C. Starck GmbH Laufenburg                          | GERMANY       |
| Tantalum | H.C. Starck Group                                    | GERMANY       |
| Tantalum | H.C. Starck Hermsdorf GmbH                           | GERMANY       |
| Tantalum | H.C. Starck Inc.                                     | UNITED STATES |
| Tantalum | H.C. Starck Ltd.                                     | JAPAN         |
| Tantalum | H.C. Starck Smelting GmbH & Co. KG                   | GERMANY       |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd.    | CHINA         |
| Tantalum | Hi-Temp Specialty Metals, Inc.                       | UNITED STATES |
| Tantalum | Hunan Chenzhou Mining Co., Ltd.                      | CHINA         |
| Tantalum | Hunan Chunchang Nonferrous Metals Co., Ltd.          | CHINA         |
| Tantalum | Ishifuku Metal Industry Co., Ltd.                    | JAPAN         |
| Tantalum | Japan Mint   | JAPAN         |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd.         | CHINA         |
| Tantalum | Jiangxi Tuohong New Raw Material                     | CHINA         |

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| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd.   | CHINA                  |
| Tantalum | Jiujiang Tanbre Co., Ltd.                     | CHINA                  |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd. | CHINA                  |
| Tantalum | JX Nippon Mining & Metals Co., Ltd.           | JAPAN                  |
| Tantalum | KEMET Blue Metals                             | MEXICO                 |
| Tantalum | KEMET Blue Powder                             | UNITED STATES          |
| Tantalum | Kennametal Huntsville                         | UNITED STATES          |
| Tantalum | King-Tan Tantalum Industry Ltd.               | CHINA                  |
| Tantalum | Kojima Chemicals Co., Ltd.                    | JAPAN                  |
| Tantalum | Korea Metal Co., Ltd.                         | KOREA, REPUBLIC OF     |
| Tantalum | LSM Brasil S.A.                               | BRAZIL                 |
| Tantalum | Luoyang Zijin Yinhui Gold Refinery Co., Ltd.  | CHINA                  |
| Tantalum | Malaysia Smelting Corporation (MSC)           | MALAYSIA               |
| Tantalum | Materion                                      | UNITED STATES          |
| Tantalum | Metallurgical Products India Pvt., Ltd.       | INDIA                  |
| Tantalum | Metalor Technologies SA                       | SWITZERLAND            |
| Tantalum | Mineração Taboca S.A.                         | BRAZIL                 |
| Tantalum | Mitsubishi Materials Corporation              | JAPAN                  |
| Tantalum | Mitsui Mining & Smelting                      | JAPAN                  |
| Tantalum | Molycorp Silmet A.S.                          | ESTONIA                |
| Tantalum | Moscow Special Alloys Processing Plant        | RUSSIAN FEDERATION     |
| Tantalum | Navoi Mining and Metallurgical Combinat       | UZBEKISTAN             |
| Tantalum | Nihon Material Co., Ltd.                      | JAPAN                  |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd.    | CHINA                  |
| Tantalum | OJSC Kolyma Refinery                          | RUSSIAN FEDERATION     |
| Tantalum | Operaciones Metalurgical S.A.                 | BOLIVIA                |
| Tantalum | PAMP SA                                       | SWITZERLAND            |
| Tantalum | Phoenix Metal Ltd.                            | RWANDA                 |
| Tantalum | Plansee                                       | AUSTRIA                |
| Tantalum | Plansee SE Liezen                             | AUSTRIA                |
| Tantalum | Plansee SE Reutte                             | AUSTRIA                |
| Tantalum | Power Resources Ltd.                          | MACEDONIA, REPUBLIC OF |
| Tantalum | Prioksky Plant of Non-Ferrous Metals          | RUSSIAN FEDERATION     |
| Tantalum | PT Aneka Tambang (Persero) Tbk                | INDONESIA              |
| Tantalum | PT Bangka Putra Karya                         | INDONESIA              |

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| Tantalum | PX Précinox SA                                       | SWITZERLAND        |
| Tantalum | QuantumClean   | UNITED STATES      |
| Tantalum | Rand Refinery (Pty) Ltd.                             | SOUTH AFRICA       |
| Tantalum | Resind Indústria e Comércio Ltda.                    | BRAZIL             |
| Tantalum | RFH Tantalum Smeltry Co., Ltd.                       | CHINA              |
| Tantalum | Royal Canadian Mint                                  | CANADA             |
| Tantalum | Rui Da Hung  | TAIWAN             |
| Tantalum | Sabin Metal Corp.                                    | UNITED STATES      |
| Tantalum | SAMWON Metals Corp.                                  | KOREA, REPUBLIC OF |
| Tantalum | Schone Edelmetaal B.V.                               | NETHERLANDS        |
| Tantalum | SEMPSA Joyería Platería SA                           | SPAIN              |
| Tantalum | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.    | CHINA              |
| Tantalum | Shanghai Jiangxi Metals Co. Ltd                      | CHINA              |
| Tantalum | SOE Shyolkovsky Factory of Secondary Precious Metals | RUSSIAN FEDERATION |
| Tantalum | Solar Applied Materials Technology Corp.             | TAIWAN             |
| Tantalum | Solikamsk Magnesium Works OAO                        | RUSSIAN FEDERATION |
| Tantalum | Sumitomo Metal Mining Co., Ltd.                      | JAPAN              |
| Tantalum | Taki Chemicals                                       | JAPAN              |
| Tantalum | Tanaka Kikinzoku Kogyo K.K.                          | JAPAN              |
| Tantalum | Tantalite Resources                                  | SOUTH AFRICA       |
| Tantalum | Telex Metals   | UNITED STATES      |
| Tantalum | Thaisarco  | THAILAND           |
| Tantalum | The Refinery of Shandong Gold Mining Co., Ltd.       | CHINA              |
| Tantalum | Tokuriki Honten Co., Ltd.                            | JAPAN              |
| Tantalum | Tongling Nonferrous Metals Group Co., Ltd.           | CHINA              |
| Tantalum | Tranzact, Inc.                                       | UNITED STATES      |
| Tantalum | Ulba Metallurgical Plant JSC                         | KAZAKHSTAN         |
| Tantalum | Valcambi SA  | SWITZERLAND        |
| Tantalum | Western Australian Mint trading as The Perth Mint    | AUSTRALIA          |
| Tantalum | Wolfram Bergbau und Hütten AG                        | AUSTRIA            |
| Tantalum | Xiamen Tungsten (H.C.) Co., Ltd.                     | CHINA              |
| Tantalum | Xiamen Tungsten Co., Ltd.                            | CHINA              |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd.        | CHINA              |
| Tantalum | Yichun Jin Yang Rare Metal Co., Ltd.                 | CHINA              |
| Tantalum | Zhuzhou Cemented Carbide                             | CHINA              |

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| Tin | A.L.M.T. TUNGSTEN Corp.   | JAPAN              |
| Tin | Aida Chemical Industries Co., Ltd.  | JAPAN              |
| Tin | Allgemeine Gold-und Silberscheideanstalt A.G.   | GERMANY            |
| Tin | Alpha   | UNITED STATES      |
| Tin | An Thai Minerals Co., Ltd.  | VIET NAM           |
| Tin | An Vinh Joint Stock Mineral Processing Company  | VIET NAM           |
| Tin | Asahi Pretec Corporation  | JAPAN              |
| Tin | Asahi Refining USA Inc.   | UNITED STATES      |
| Tin | Asaka Riken Co., Ltd.   | JAPAN              |
| Tin | Bangko Sentral ng Pilipinas (Central Bank of the Philippines)                         | PHILIPPINES        |
| Tin | C. Hafner GmbH + Co. KG   | GERMANY            |
| Tin | Caridad   | MEXICO             |
| Tin | CCR Refinery - Glencore Canada Corporation  | CANADA             |
| Tin | Cendres + Métaux SA   | SWITZERLAND        |
| Tin | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.                                     | CHINA              |
| Tin | China Minmetals   | CHINA              |
| Tin | China Tin Group Co., Ltd.   | CHINA              |
| Tin | Chugai Mining   | JAPAN              |
| Tin | CNMC (Guangxi) PGMA Co., Ltd.   | CHINA              |
| Tin | Cooperativa Metalurgica de Rondônia Ltda.   | BRAZIL             |
| Tin | CV Ayi Jaya   | INDONESIA          |
| Tin | CV Dua Sekawan  | INDONESIA          |
| Tin | CV Gita Pesona  | INDONESIA          |
| Tin | CV Makmur Jaya  | INDONESIA          |
| Tin | CV Serumpun Sebalai   | INDONESIA          |
| Tin | CV Tiga Sekawan   | INDONESIA          |
| Tin | CV United Smelting  | INDONESIA          |
| Tin | CV Venus Inti Perkasa   | INDONESIA          |
| Tin | Daejin Indus Co., Ltd.  | KOREA, REPUBLIC OF |
| Tin | Daye Non-Ferrous Metals Mining Ltd.   | CHINA              |
| Tin | DODUCO GmbH   | GERMANY            |
| Tin | Dowa  | JAPAN              |
| Tin | Duoluoshan  | CHINA              |
| Tin | Eco-System Recycling Co., Ltd.  | JAPAN              |
| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | VIET NAM           |



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| Tin | Elemetal Refining, LLC                         | UNITED STATES      |
| Tin | Elmet S.L.U.                                   | SPAIN              |
| Tin | EM Vinto                                       | BOLIVIA            |
| Tin | Estanho de Rondônia S.A.                       | BRAZIL             |
| Tin | Feinhütte Halsbrücke GmbH                      | GERMANY            |
| Tin | Fenix Metals                                   | POLAND             |
| Tin | Ganzhou Huaxing Tungsten Products Co., Ltd.    | CHINA              |
| Tin | Ganzhou Seadragon W & Mo Co., Ltd.             | CHINA              |
| 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 | Gold Bell Group                                | CHINA              |
| Tin | Guanyang Guida Nonferrous Metal Smelting Plant | CHINA              |
| Tin | H.C. Starck GmbH                               | GERMANY            |
| Tin | Heimerle + Meule GmbH                          | GERMANY            |
| Tin | Heraeus Ltd. Hong Kong                         | CHINA              |
| Tin | Heraeus Precious Metals GmbH & Co. KG          | GERMANY            |
| Tin | HuiChang Hill Tin Industry Co., Ltd.           | CHINA              |
| Tin | Huichang Jinshunda Tin Co., Ltd.               | CHINA              |
| Tin | Hunan Chunchang Nonferrous Metals Co., Ltd.    | CHINA              |
| Tin | Japan New Metals Co., Ltd.                     | JAPAN              |
| Tin | Jiangxi Copper Company Limited                 | CHINA              |
| Tin | Jiangxi Ketai Advanced Material Co., Ltd.      | CHINA              |
| Tin | JX Nippon Mining & Metals Co., Ltd.            | JAPAN              |
| Tin | Kennametal Huntsville                          | UNITED STATES      |
| Tin | Kennecott Utah Copper LLC                      | UNITED STATES      |
| Tin | Kyrgyzaltyn JSC                                | KYRGYZSTAN         |
| Tin | L' azurde Company For Jewelry                  | SAUDI ARABIA       |
| Tin | Lingbao Jinyuan Tonghui Refinery Co., Ltd.     | CHINA              |
| Tin | Linwu Xianggui Ore Smelting Co., Ltd.          | CHINA              |
| Tin | LS-NIKKO Copper Inc.                           | KOREA, REPUBLIC OF |
| Tin | Ma On Shuguang Smelting Plant                  | CHINA              |

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| Tin | Magnu's Minerais Metais e Ligas Ltda.            | BRAZIL             |
| Tin | Malaysia Smelting Corporation (MSC)              | MALAYSIA           |
| Tin | Materion   | UNITED STATES      |
| Tin | Matsuda Sangyo Co., Ltd.                         | JAPAN              |
| Tin | Melt Metais e Ligas S.A.                         | BRAZIL             |
| Tin | Metahub Industries Sdn. Bhd.                     | MALAYSIA           |
| Tin | Metallic Resources, Inc.                         | UNITED STATES      |
| Tin | Metallo-Chimique N.V.                            | BELGIUM            |
| Tin | Metalor Technologies SA                          | SWITZERLAND        |
| Tin | Mineração Taboca S.A.                            | BRAZIL             |
| Tin | Minsur   | PERU               |
| Tin | Mitsubishi Materials Corporation                 | JAPAN              |
| Tin | Mitsui Mining and Smelting Co., Ltd.             | JAPAN              |
| Tin | Modeltech Sdn Bhd                                | MALAYSIA           |
| Tin | Molycorp Silmet A.S.                             | ESTONIA            |
| Tin | Nankang Nanshan Tin Manufactory Co., Ltd.        | CHINA              |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company | VIET NAM           |
| Tin | Ningxia Orient Tantalum Industry Co., Ltd.       | CHINA              |
| Tin | Novosibirsk Integrated Tin Works                 | RUSSIAN FEDERATION |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd.          | THAILAND           |
| Tin | O.M. Manufacturing Philippines, Inc.             | PHILIPPINES        |
| Tin | OJSC Novosibirsk Refinery                        | RUSSIAN FEDERATION |
| Tin | Operaciones Metalurgical S.A.                    | BOLIVIA            |
| Tin | Phoenix Metal Ltd.                               | RWANDA             |
| Tin | Plansee SE Liezen                                | AUSTRIA            |
| Tin | PT Alam Lestari Kencana                          | INDONESIA          |
| 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 Kudai Tin                              | INDONESIA          |
| Tin | PT Bangka Prima Tin                              | INDONESIA          |
| Tin | PT Bangka Putra Karya                            | INDONESIA          |
| Tin | PT Bangka Timah Utama Sejahtera                  | INDONESIA          |

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| Tin | PT Bangka Tin Industry         | INDONESIA |
| Tin | PT Belitung Industri Sejahtera | INDONESIA |
| Tin | PT BilliTin Makmur Lestari     | INDONESIA |
| Tin | PT Bukit Timah                 | INDONESIA |
| Tin | PT Cipta Persada Mulia         | INDONESIA |
| Tin | PT Donna Kembara Jaya          | INDONESIA |
| Tin | PT DS Jaya Abadi               | INDONESIA |
| Tin | PT Eunindo Usaha Mandiri       | INDONESIA |
| Tin | PT Fang Di MulTindo            | INDONESIA |
| Tin | PT HANJAYA PERKASA METALS      | INDONESIA |
| Tin | PT HP Metals Indonesia         | INDONESIA |
| Tin | PT Inti Stania Prima           | INDONESIA |
| Tin | PT Justindo                    | INDONESIA |
| Tin | PT Karimun Mining              | INDONESIA |
| Tin | PT Kijang Jaya Mandiri         | INDONESIA |
| Tin | PT Koba Tin                    | INDONESIA |
| Tin | PT Lautan Harmonis Sejahtera   | INDONESIA |
| Tin | PT Menara Cipta Mulia          | INDONESIA |
| Tin | PT Mitra Stania Prima          | INDONESIA |
| Tin | PT O.M. Indonesia              | INDONESIA |
| Tin | PT Panca Mega Persada          | INDONESIA |
| Tin | PT Pelat Timah Nusantara Tbk   | INDONESIA |
| Tin | PT Prima Timah Utama           | INDONESIA |
| Tin | PT Rajwa International         | INDONESIA |
| Tin | PT Refined Bangka Tin          | INDONESIA |
| Tin | PT Sariwiguna Binasantosa      | INDONESIA |
| Tin | PT Seirama Tin Investment      | INDONESIA |
| Tin | PT Singkep Times Utama         | INDONESIA |
| Tin | PT Stanindo Inti Perkasa       | INDONESIA |
| Tin | PT Sukses Inti Makmur          | INDONESIA |
| Tin | PT Sumber Jaya Indah           | INDONESIA |
| Tin | PT Supra Sukses Trinusa        | INDONESIA |
| Tin | PT Timah (Persero) Tbk Kunder  | INDONESIA |
| Tin | PT Timah (Persero) Tbk Mentok  | INDONESIA |
| Tin | PT Tinindo Inter Nusa          | INDONESIA |

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| Tin      | PT Tirus Putra Mandiri                              | INDONESIA          |
| Tin      | PT Tommy Utama                                      | INDONESIA          |
| Tin      | PT Wahana Perkit Jaya                               | INDONESIA          |
| Tin      | PT Yinchendo Mining Industry                        | INDONESIA          |
| Tin      | Republic Metals Corporation                         | UNITED STATES      |
| Tin      | Resind Indústria e Comércio Ltda.                   | BRAZIL             |
| Tin      | Rui Da Hung   | TAIWAN             |
| Tin      | So Accurate Refining Group                          | UNITED STATES      |
| Tin      | Soft Metais Ltda.                                   | BRAZIL             |
| Tin      | Solar Applied Materials Technology Corp.            | TAIWAN             |
| Tin      | Solikamsk Magnesium Works OAO                       | RUSSIAN FEDERATION |
| Tin      | Sumitomo Metal Mining Co., Ltd.                     | JAPAN              |
| Tin      | Tanaka Kikinzoku Kogyo K.K.                         | JAPAN              |
| Tin      | Thaisarco   | THAILAND           |
| Tin      | The Nankang Nanshan Tin Co., Ltd.                   | CHINA              |
| Tin      | The Refinery of Shandong Gold Mining Co., Ltd.      | CHINA              |
| Tin      | Tongling Nonferrous Metals Group Co., Ltd.          | CHINA              |
| Tin      | Tuyen Quang Non-Ferrous Metals Joint Stock Company  | VIET NAM           |
| Tin      | Umicore SA Business Unit Precious Metals Refining   | BELGIUM            |
| Tin      | VQB Mineral and Trading Group JSC                   | VIET NAM           |
| Tin      | Western Australian Mint trading as The Perth Mint   | AUSTRALIA          |
| Tin      | White Solder Metalurgia e Mineração Ltda.           | BRAZIL             |
| Tin      | Xiamen Tungsten Co., Ltd.                           | CHINA              |
| Tin      | Yifeng Tin Industry (Chenzhou) Co Ltd               | CHINA              |
| Tin      | Yokohama Metal Co., Ltd.                            | JAPAN              |
| Tin      | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.       | CHINA              |
| Tin      | Yunnan Tin Company Limited                          | CHINA              |
| Tin      | ZhongShi  | CHINA              |
| Tin      | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | CHINA              |
| Tin      | Zhuzhou Cemented Carbide                            | CHINA              |
| Tin      | Zijin Mining Group Co., Ltd. Gold Refinery          | CHINA              |
| Tungsten | A.L.M.T. TUNGSTEN Corp.                             | JAPAN              |
| Tungsten | ACL Metais Eireli                                   | BRAZIL             |
| Tungsten | Advanced Chemical Company                           | UNITED STATES      |
| Tungsten | Aida Chemical Industries Co., Ltd.                  | JAPAN              |

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| Tungsten | Asia Tungsten Products Vietnam Ltd.                | VIET NAM           |
| Tungsten | Beijing Zenith Materials                           | CHINA              |
| Tungsten | CCR Refinery - Glencore Canada Corporation         | CANADA             |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd.       | CHINA              |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd.               | CHINA              |
| Tungsten | Dayu Jincheng Tungsten Industry Co., Ltd.          | CHINA              |
| Tungsten | Dayu Weiliang Tungsten Co., Ltd.                   | CHINA              |
| Tungsten | Elemetal Refining, LLC                             | UNITED STATES      |
| Tungsten | Exotech Inc.                                       | UNITED STATES      |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd.                   | CHINA              |
| Tungsten | Ganxian Shirui New Material Co., Ltd.              | CHINA              |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd.        | CHINA              |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd.            | CHINA              |
| Tungsten | Ganzhou Non-ferrous Metals Smelting Co., Ltd.      | CHINA              |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd.                 | CHINA              |
| Tungsten | Ganzhou Yatai Tungsten Co., Ltd.                   | CHINA              |
| Tungsten | Global Tungsten & Powders Corp.                    | UNITED STATES      |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd.               | CHINA              |
| Tungsten | H.C. Starck GmbH                                   | GERMANY            |
| Tungsten | H.C. Starck Inc.                                   | UNITED STATES      |
| Tungsten | H.C. Starck Smelting GmbH & Co.KG                  | GERMANY            |
| Tungsten | Heraeus Ltd. Hong Kong                             | CHINA              |
| Tungsten | Heraeus Precious Metals GmbH & Co. KG              | GERMANY            |
| Tungsten | Hi-Temp Specialty Metals, Inc.                     | UNITED STATES      |
| Tungsten | Hunan Chenzhou Mining Co., Ltd.                    | CHINA              |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji    | CHINA              |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Yanglin | CHINA              |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd.        | CHINA              |
| Tungsten | Hydrometallurg, JSC                                | RUSSIAN FEDERATION |
| Tungsten | Istanbul Gold Refinery                             | TURKEY             |
| Tungsten | Japan New Metals Co., Ltd.                         | JAPAN              |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd.    | CHINA              |
| Tungsten | Jiangxi Copper Company Limited                     | CHINA              |
| Tungsten | Jiangxi Dayu Longxintai Tungsten Co., Ltd.         | CHINA              |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd.                 | CHINA              |

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| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.         | CHINA              |
| Tungsten | Jiangxi Richsea New Materials Co., Ltd.                       | CHINA              |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | CHINA              |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd.                  | CHINA              |
| Tungsten | Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd.          | CHINA              |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd.                           | CHINA              |
| Tungsten | Jiujiang Tanbre Co., Ltd.                                     | CHINA              |
| Tungsten | JX Nippon Mining & Metals Co., Ltd.                           | JAPAN              |
| Tungsten | KEMET Blue Powder   | UNITED STATES      |
| Tungsten | Kennametal Fallon   | UNITED STATES      |
| Tungsten | Kennametal Huntsville   | UNITED STATES      |
| Tungsten | Kennecott Utah Copper LLC                                     | UNITED STATES      |
| Tungsten | Malaysia Smelting Corporation (MSC)                           | MALAYSIA           |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd.                               | CHINA              |
| Tungsten | Materion  | UNITED STATES      |
| Tungsten | Matsuda Sangyo Co., Ltd.                                      | JAPAN              |
| Tungsten | Metallo-Chimique N.V.   | BELGIUM            |
| Tungsten | Metalor Technologies (Hong Kong) Ltd.                         | CHINA              |
| Tungsten | Metalor Technologies (Singapore) Pte., Ltd.                   | SINGAPORE          |
| Tungsten | Metalor USA Refining Corporation                              | UNITED STATES      |
| Tungsten | Minsur  | PERU               |
| Tungsten | Mitsubishi Materials Corporation                              | JAPAN              |
| Tungsten | Mitsui Mining and Smelting Co., Ltd.                          | JAPAN              |
| Tungsten | Moliren Ltd   | RUSSIAN FEDERATION |
| Tungsten | Nadir Metal Rafineri San. Ve Tic. A.Ş.                        | TURKEY             |
| Tungsten | Niagara Refining LLC  | UNITED STATES      |
| Tungsten | Ningxia Orient Tantalum Industry Co., Ltd.                    | CHINA              |
| Tungsten | Novosibirsk Processing Plant Ltd.                             | RUSSIAN FEDERATION |
| Tungsten | Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC     | VIET NAM           |
| Tungsten | Operaciones Metalurgical S.A.                                 | BOLIVIA            |
| Tungsten | Philippine Chuangxin Industrial Co., Inc.                     | PHILIPPINES        |
| Tungsten | Plansee SE Liezen   | AUSTRIA            |
| Tungsten | Plansee SE Reutte   | AUSTRIA            |
| Tungsten | Pobedit, JSC  | RUSSIAN FEDERATION |
| Tungsten | PT Bukit Timah  | INDONESIA          |

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| Tungsten | PT Timah (Persero) Tbk Mentok  | INDONESIA          |
| Tungsten | Sanher Tungsten Vietnam Co., Ltd.  | VIET NAM           |
| Tungsten | SEMPSA Joyería Platería SA   | SPAIN              |
| Tungsten | So Accurate Group, Inc.  | UNITED STATES      |
| Tungsten | Solar Applied Materials Technology Corp.   | TAIWAN             |
| Tungsten | South-East Nonferrous Metal Company Limited of Hengyang City   | CHINA              |
| Tungsten | Sumitomo Metal Mining Co., Ltd.  | JAPAN              |
| Tungsten | Tanaka Kikinzoku Kogyo K.K.  | JAPAN              |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd.  | VIET NAM           |
| Tungsten | Thaisarco  | THAILAND           |
| Tungsten | The Refinery of Shandong Gold Mining Co., Ltd.   | CHINA              |
| Tungsten | Triumph Northwest  | UNITED STATES      |
| Tungsten | Ulba Metallurgical Plant JSC   | KAZAKHSTAN         |
| Tungsten | Unecha Refractory metals plant   | RUSSIAN FEDERATION |
| Tungsten | Vietnam Youngsun Tungsten Industry Co., Ltd.   | VIET NAM           |
| Tungsten | Wolfram Bergbau und Hütten AG  | AUSTRIA            |
| Tungsten | Wolfram Company CJSC   | RUSSIAN FEDERATION |
| 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 Material Co., Ltd.  | CHINA              |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd.  | CHINA              |
| Tungsten | Yokohama Metal Co., Ltd.   | JAPAN              |
| Tungsten | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.  | CHINA              |
| Tungsten | Zhuzhou Cement Carbide   | CHINA              |
| Tungsten | Zhuzhou Cemented Carbide   | CHINA              |
| Tungsten | Zijin Mining Group Co., Ltd. Gold Refinery   | CHINA              |
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|          | * A number of smelter names on this list are repeated because they (1) represent separate smelters with unique CID numbers but share similar names or (2) were used for processing more than one subject material. |                    |