

SYNNEX CORP

FORM SD (Specialized Disclosure Report)

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

FORM SD
Specialized Disclosure Report

SYNNEX CORPORATION

(Exact name of registrant as specified in its charter)

Delaware
(State or other jurisdiction of
incorporation or organization)

001-31892
(Commission
File Number)

94-2703333
(I.R.S. Employer
Identification No.)

44201 Nobel Drive
Fremont, California
(Address of principal executive offices)

94538
(Zip Code)

Simon Y. Leung
Senior Vice President, General Counsel and Secretary
(510) 656-3333
(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:

X Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2016.

Section 1 – Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

As provided for in Rule 13p-1 under the Securities Exchange Act of 1934, as amended, and Form SD, a Conflict Minerals Report is provided as an exhibit to this Form SD and is available at <http://ir.synnex.com/sec.cfm>. The information contained on our website is not incorporated by reference into this Form SD or our Conflict Minerals Report and should not be considered part of this Form SD or the Conflict Minerals Report.

Item 1.02 Exhibit

The Conflict Minerals Report described in Item 1.01 is filed as Exhibit 1.01 to this Form SD.

Section 2 – Exhibits

Item 2.01 Exhibits

Exhibit No.	Description
1.01	Conflict Minerals Report for the calendar year ended December 31, 2016.

SIGNATURES

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

SYNNEX CORPORATION

By: /s/ Simon Y. Leung

Dated: May 31, 2017

Simon Y. Leung
Senior Vice President, General Counsel and
Corporate Secretary

EXHIBIT INDEX

Exhibit No.	Description
1.01	Conflict Minerals Report for the calendar year ended December 31, 2016.

CONFLICT MINERALS REPORT

OVERVIEW

This report for the reporting period from January 1, 2016 to December 31, 2016 has been prepared by SYNNEX Corporation (the “Company,” “we,” “us” or “our”) pursuant to Rule 13p-1 promulgated under the Securities Exchange Act of 1934, as amended, and Form SD (collectively, the “Conflict Minerals Rule”). As used herein and consistent with the Conflict Minerals Rule, “Conflict Minerals” or “3TG” are columbite-tantalite (coltan), cassiterite, gold, wolframite and the derivatives tantalum, tin and tungsten, without regard to the location of origin of the minerals or derivative metals.

We are a leading business process services company, providing a comprehensive range of distribution, logistics and integration services for the technology industry and providing outsourced services focused on customer engagement strategy to a broad range of enterprises. We are organized to provide our products and services through two reportable business segments: Technology Solutions and Concentrix. Our Technology Solutions segment distributes peripherals, IT systems including data center server and storage solutions, system components, software, networking/communications/security equipment, consumer electronics, or CE, and complementary products. Within our Technology Solutions segment, we also provide systems design and integration solutions. Our Concentrix segment offers a portfolio of strategic solutions and end-to-end business services focused on customer engagement strategy, process optimization, technology innovation, front and back-office automation and business transformation to clients in ten identified industry verticals. Our revenues for 2016 largely were from distribution and global business services that were not in-scope for purposes of our compliance with the Conflict Minerals Rule.

PRODUCT SCOPING; REASONABLE COUNTRY OF ORIGIN INQUIRY; DUE DILIGENCE DETERMINATION

For 2016, a portion of the systems design and integration business within our Technology Solutions segment involved our manufacture, through assembly or integration, of data center servers and storage products. 3TG were necessary to the functionality or production of these manufactured products. Accordingly, these products were in-scope for purposes of our compliance with the Conflict Minerals Rule. Taken as a whole, our in-scope products contained all four 3TG, but each individual product did not contain all four 3TG.

We purchase only finished components and do not purchase 3TG directly from any smelter, refiner or mine. We have relationships with an extensive network of suppliers throughout the world, and we believe that there are generally multiple tiers between the mines, smelters, refiners and our direct suppliers. Therefore, we have

requested our direct suppliers to work with their upstream suppliers so that they may provide us with information about the origin of 3TG in the components we purchase for inclusion in the products that we manufacture.

To determine whether any of the 3TG in the components contained in our data center servers and storage products originated in the Democratic Republic of the Congo or an adjoining country (the “Covered Countries”), or were from recycled or scrap sources, we conducted a reasonable country of origin inquiry (“RCOI”) within the meaning of the Conflict Minerals Rule, requesting that suppliers of the components we included in our manufactured products for 2016 complete the Conflict-Free Sourcing Initiative (“CFSI”) Conflict Minerals Reporting Template (“CMRT”), which includes questions regarding identified smelters and refiners in the supplier’s supply chain and the supplier’s compliance procedures. We determined that requesting that our suppliers complete the CMRT represented our reasonable best efforts to determine the mines or locations of origin of 3TG in our supply chain. Our RCOI utilized the processes and procedures contemplated by Steps 1 and 2 of the OECD Guidance (as defined below). Selected elements of those steps are discussed under “Due Diligence.”

Most of the suppliers that completed CMRTs provided data at the company level, with a small minority reporting at a level specific to the category of components that we purchased from them. Some suppliers indicated that 3TG contained in their components were not sourced from the Covered Countries, and some suppliers indicated that their products contain minerals sourced from the Covered Countries but from smelters which were certified as “compliant” by an independent third party. There were also suppliers that indicated they used some recycled or scrap 3TG content in the types of components they sell.

After conducting an RCOI and exercising the due diligence described in this Conflict Minerals Report, as applicable, and in light of the limited information specific to our products provided to us by our suppliers, we concluded for 2016 that each of our data center servers and storage products contained 3TG of undetermined origin. Based on the information provided by the suppliers that completed CMRTs, we believe that the facilities that may have been used to process necessary 3TG contained in our in-scope products include the smelters and refiners listed in the Annex at the end of this Conflict Minerals Report and we believe that the countries of origin of the 3TG processed by such smelters and refiners may include the countries listed in the Annex. We endeavored to determine the mine or location of origin of the necessary 3TG contained in our in-scope products by requesting that the suppliers provide us with a completed CMRT and through the other procedures followed by us that are described in this Conflict Minerals Report.

DUE DILIGENCE

Our due diligence measures have been designed to conform, in all material respects, with the due diligence framework presented by the Organisation for Economic Co-operation and Development in the publication *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition)*, including the related Supplements for gold and for tin, tantalum and tungsten (the “OECD

Guidance”). The OECD Guidance has established a five-step framework for due diligence as a basis for responsible global supply chain management of minerals from conflict-affected and high-risk areas. Our implementation of the OECD Guidance in respect of 2016 is discussed below, but these were not all of the discrete measures that we took in furtherance of our conflict minerals policy (which is discussed below) or pursuant to the Conflict Minerals Rule and the OECD Guidance.

1. Establish Strong Company Management Systems

Our 3TG due diligence team was led by our Senior Vice President, General Counsel and Corporate Secretary, and our President, Hyve Solutions, and included subject matter experts from legal, finance, product management, and sales. We also retained specialist outside counsel to assist us with our compliance efforts.

We used the CMRT to identify smelters and refiners that were possibly in our supply chain. We maintain business records relating to 3TG due diligence in respect of 2016, including records of due diligence processes, findings and resulting decisions, on a computerized database, and relevant materials are preserved for appropriate periods consistent with the OECD Guidance.

We have a conflict minerals policy, which is available on our website at http://files.shareholder.com/downloads/SNX/0x0x758243/a29e58d8-4c8f-4ec3-a297-27eb9ac6c2cf/SNX_Conflict_Minerals_Policy_Statement05-23-14fnl.pdf (the “Conflict Minerals Policy”). The Conflict Minerals Policy sets forth our expectation that the suppliers in our supply chain procure 3TG responsibly and avoid sourcing that funds armed conflict contributing to the crisis in the Covered Countries. Our Conflict Minerals Policy also sets forth our expectation that our suppliers facilitate our efforts by providing us with appropriate information when we request, and conduct the necessary due diligence to identify smelters and refiners, from which the 3TG in their respective supply chains originate. We have a public email address (conflictmineralsinquiries@synnex.com) available on our website for general inquiries and grievances regarding our 3TG program and sources of 3TG. This mechanism serves as our grievance mechanism.

We do not support the embargo of 3TG from the Covered Countries and are supportive of suppliers continuing to source from responsible sources in those countries.

To further our efforts in identifying and assessing 3TG sourcing risks in our supply chain, we have included a 3TG flow-down clause in new supplier contracts that requires suppliers to provide us with information about the source of 3TG.

2. Identify and Assess Risks in the Supply Chain

To determine whether any of the necessary 3TG contained in our in-scope products originated in the Covered Countries, we requested that direct suppliers of the components we used in the in-scope products complete the CMRT. We requested our suppliers’ cooperation in gathering information from their respective suppliers.

We reviewed the completed CMRTs received from our suppliers. To the extent that a CMRT identified a smelter or refiner, we reviewed that information against the Smelter Reference List tab of the CMRT and the list of “compliant” and “active” smelters and refiners published by the CFSI. We also used the CMRT responses to review our direct suppliers’ due diligence activities, such as whether they had a conflict minerals policy and required their own suppliers to source from compliant sources.

3. Design and Implement a Strategy to Respond to Identified Risks

Senior management was briefed about our due diligence efforts. We have a risk management plan that outlines our responses in general terms to identified risks.

4. Carry Out Third Party Audit of Supply Chain Due Diligence at Identified Points in the Supply Chain

In connection with our due diligence, we utilized and relied on information made available by the CFSI concerning independent third-party audits of smelters and refiners. We do not have a direct relationship with any smelters or refiners and do not perform or direct audits of those entities within our supply chain.

5. Report on Supply Chain Due Diligence

This Conflict Minerals Report and our Form SD are available on our website and are filed with the Securities and Exchange Commission. Based on the information provided by our suppliers, we believe that the facilities that may have been used to process the 3TG in our products include the smelters and refiners listed in Annex A below.

ANNEX

Capitalized terms used and not otherwise defined in this Annex have the meanings set forth in the Conflict Minerals Report of which this Annex is a part.

Smelters and Refiners(1)

The following list includes smelters and refiners in “product-category” level CMRTs that we received. The list may not include all of the smelters and refiners that processed 3TG in the products that we manufactured for 2016 and may include smelters and refiners that processed 3TG in the general category of components a supplier sells but were not in the individual components we purchased from the supplier, as (i) the list contains only smelters and refiners confirmed as smelters and refiners by the CFSI and their compliance status as confirmed by the CFSI, (ii) not all of our suppliers completed CMRTs, (iii) many of the suppliers indicated that they only identified a portion of the smelters and refiners in their supply chain, and (iv) no supplier confirmed to us that its CMRT was limited to only the individual components we purchased from the supplier.

Mineral	Smelter or Refiner Name	Smelter or Refiner Location	Status
Gold	Advanced Chemical Company	United States	Compliant
Gold	Aida Chemical Industries Co., Ltd.	Japan	Compliant
Gold	Al Etihad Gold Refinery DMCC	United Arab Emirates	Compliant
Gold	Allgemeine Gold-und Silberscheideanstalt A.G.	Germany	Compliant
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	Uzbekistan	Compliant
Gold	AngloGold Ashanti Córrego do Sítio Mineração	Brazil	Compliant
Gold	Argor-Heraeus SA	Switzerland	Compliant
Gold	Asahi Pretec Corporation	Japan	Compliant
Gold	Asaka Riken Co., Ltd.	Japan	Compliant
Gold	AU Traders and Refiners	South Africa	Compliant
Gold	Aurubis AG	Germany	Compliant
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	Philippines	Compliant
Gold	Boliden AB	Sweden	Compliant
Gold	C. Hafner GmbH + Co. KG	Germany	Compliant
Gold	CCR Refinery - Glencore Canada Corporation	Canada	Compliant
Gold	Chimet S.p.A.	Italy	Compliant
Gold	Daejin Indus Co., Ltd.	Republic of Korea	Compliant
Gold	Do Sung Corporation	Republic of Korea	Compliant
Gold	DODUCO GmbH	Germany	Compliant
Gold	Dowa	Japan	Compliant
Gold	Eco-System Recycling Co., Ltd.	Japan	Compliant
Gold	Emirates Gold DMCC	United Arab Emirates	Compliant
Gold	Geib Refining Corporation	United States of America	Compliant
Gold	Heimerle + Meule GmbH	Germany	Compliant
Gold	Heraeus Ltd. Hong Kong	China	Compliant

Mineral	Smelter or Refiner Name	Smelter or Refiner Location	Status
Gold	Heraeus Precious Metals GmbH & Co. KG	Germany	Compliant
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Company Limited	China	Compliant
Gold	Ishifuku Metal Industry Co., Ltd.	Japan	Compliant
Gold	Istanbul Gold Refinery	Turkey	Compliant
Gold	Japan Mint	Japan	Compliant
Gold	Jiangxi Copper Company Limited	China	Compliant
Gold	JSC Ekaterinburg Non-Ferrous Metal Processing Plant	Russian Federation	Compliant
Gold	JSC Uralelectromed	Russian Federation	Compliant
Gold	JX Nippon Mining & Metals Co., Ltd.	Japan	Compliant
Gold	Kazzinc	Kazakhstan	Compliant
Gold	Kennecott Utah Copper LLC	United States	Compliant
Gold	Kojima Chemicals Co., Ltd.	Japan	Compliant
Gold	Korea Zinc Co., Ltd.	Republic of Korea	Compliant
Gold	Kyrgyzaltyn JSC	Kyrgystan	Compliant
Gold	LS-NIKKO Copper Inc.	Republic of Korea	Compliant
Gold	Materion	United States	Compliant
Gold	Matsuda Sangyo Co., Ltd.	Japan	Compliant
Gold	Metalor Technologies (Hong Kong) Ltd.	China	Compliant
Gold	Metalor Technologies (Singapore) Pte., Ltd.	Singapore	Compliant
Gold	Metalor Technologies SA	Switzerland	Compliant
Gold	Metalor Technologies (Suzhou) Ltd.	China	Compliant
Gold	Metalor USA Refining Corporation	United States	Compliant
Gold	Metalurgica Met-Mex Penoles S.A. de CV	Mexico	Compliant
Gold	Mitsubishi Materials Corporation	Japan	Compliant
Gold	Mitsui Mining and Smelting Co., Ltd.	Japan	Compliant
Gold	MMTC-PAMP India Pvt., Ltd.	India	Compliant
Gold	Moscow Special Alloys Processing Plant	Russian Federation	Compliant
Gold	Nadir Metal Rafineri San. Ve Tic. A.Ş.	Turkey	Compliant
Gold	Nihon Material Co., Ltd.	Japan	Compliant
Gold	Ögussa Österreichische Gold- und Silber-Scheideanstalt GmbH	Austria	Compliant
Gold	Ohura Precious Metal Industry Co., Ltd.	Japan	Compliant
Gold	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	Russian Federation	Compliant
Gold	OJSC Novosibirsk Refinery	Russian Federation	Compliant
Gold	PAMP SA	Switzerland	Compliant
Gold	JX Nippon Mining & Metals Co., Ltd.	Japan	Compliant
Gold	Prioksky Plant of Non-Ferrous Metals	Russian Federation	Compliant
Gold	PT Aneka Tambang (Persero) Tbk	Indonesia	Compliant
Gold	PX Précinox SA	Switzerland	Compliant
Gold	Rand Refinery (Pty) Ltd.	South Africa	Compliant
Gold	Republic Metals Corporation	United States	Compliant
Gold	Royal Canadian Mint	Canada	Compliant
Gold	SAAMP	France	Compliant

Mineral	Smelter or Refiner Name	Smelter of Refiner Location	Status
Gold	Samduck Precious Metals	Republic of Korea	Compliant
Gold	SAXONIA Edelmetalle GmbH	Germany	Compliant
Gold	Schone Edelmetaal B.V.	Netherlands	Compliant
Gold	SEMPSA Joyería Platería SA	Spain	Compliant
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	China	Compliant
Gold	Sichuan Tianze Precious Metals Co., Ltd.	China	Compliant
Gold	Singway Technology Co., Ltd.	Taiwan	Compliant
Gold	SOE Shyolkovsky Factory of Secondary Precious Metals	Russian Federation	Compliant
Gold	Solar Applied Materials Technology Corp.	Taiwan	Compliant
Gold	Sumitomo Metal Mining Co., Ltd.	Japan	Compliant
Gold	T.C.A S.p.A	Italy	Compliant
Gold	Tanaka Kikinzoku Kogyo K.K.	Japan	Compliant
Gold	The Refinery of Shandong Gold Mining Co., Ltd.	China	Compliant
Gold	Tokuriki Honten Co., Ltd.	Japan	Compliant
Gold	Torecom	Republic of Korea	Compliant
Gold	Umicore Brasil Ltda.	Brazil	Compliant
Gold	Umicore Precious Metals Thailand	Thailand	Compliant
Gold	Umicore S.A. Business Unit Precious Metals Refining	Belgium	Compliant
Gold	United Precious Metal Refining, Inc.	United States	Compliant
Gold	Valcambi SA	Switzerland	Compliant
Gold	Western Australian Mint trading as The Perth Mint	Australia	Compliant
Gold	WIELAND Edelmetalle GmbH	Germany	Compliant
Gold	Yamamoto Precious Metal Co., Ltd.	Japan	Compliant
Gold	Yokohama Metal Co., Ltd.	Japan	Compliant
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	China	Compliant
Gold	Zijin Mining Group Co., Ltd. Gold Refinery	China	Compliant
Gold	Bangalore Refinery	India	Active
Gold	KGHM Polska Miedz Spolka Akcyjna	Poland	Active
Gold	Navoi Mining and Metallurgical Combinat	Uzbekistan	Active
Gold	SAFINA A.S.	Czech Republic	Active
Gold	Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	Turkey	Reference List
Gold	Bauer Walser AG	Germany	Reference List
Gold	Caridad	Mexico	Reference List
Gold	Cendres + Métaux SA	Switzerland	Reference List
Gold	Chugai Mining	Japan	Reference List
Gold	Daye Non-Ferrous Metals Mining Ltd.	China	Reference List
Gold	Gansu Seemine Material Hi-Tech Co., Ltd.	China	Reference List
Gold	Great Wall Precious Metals Co., Ltd. of CBPM	China	Reference List
Gold	Guangdong Jinding Gold Limited	China	Reference List
Gold	Hangzhou Fuchunjiang Smelting Co., Ltd.	China	Reference List
Gold	Hunan Chenzhou Mining Co., Ltd.	China	Reference List
Gold	Hwasung CJ Co., Ltd.	Republic of Korea	Reference List
Gold	Johnson Matthey Inc. (USA)	United States	Reference List

Mineral	Smelter or Refiner Name	Smelter or Refiner Location	Status
Gold	Kazakhmys Smelting LLC	Kazakhstan	Reference List
Gold	L' azurde Company For Jewelry	Saudi Arabia	Reference List
Gold	Lingbao Gold Company Limited	China	Reference List
Gold	Lingbao Jinyuan Tonghui Refinery Co., Ltd.	China	Reference List
Gold	Luoyang Zijin Yinhui Gold Refinery Co., Ltd.	China	Reference List
Gold	Morris and Watson	New Zealand	Reference List
Gold	Ohio Precious Metals [Elemental Refining]	United States	Reference List
Gold	Penglai Penggang Gold Industry Co., Ltd.	China	Reference List
Gold	Remondis Argentia B.V.	Netherlands	Reference List
Gold	Sabin Metal Corp.	United States	Reference List
Gold	SAMWON Metals Corp.	Republic of Korea	Reference List
Gold	Shandong Tiancheng Biological Gold Industrial Co., Ltd.	China	Reference List
Gold	So Accurate Group, Inc.	United States	Reference List
Gold	Tongling Nonferrous Metals Group Co., Ltd.	China	Reference List
Gold	Xstrata Canada Corporation	Canada	Reference List
Gold	Yunnan Copper Industry Co., Ltd.	China	Reference List
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	China	Compliant
Tantalum	Conghua Tantalum and Niobium Smeltry	China	Compliant
Tantalum	D Block Metals, LLC	United States	Compliant
Tantalum	Duoluoshan	China	Compliant
Tantalum	Exotech Inc.	United States	Compliant
Tantalum	F&X Electro-Materials Ltd.	China	Compliant
Tantalum	FIR Metals & Resource Ltd.	China	Compliant
Tantalum	Global Advanced Metals Aizu	Japan	Compliant
Tantalum	Global Advanced Metals Boyertown	United States	Compliant
Tantalum	Guangdong Zhiyuan New Material Co., Ltd.	China	Compliant
Tantalum	H.C. Starck Co., Ltd.	Thailand	Compliant
Tantalum	H.C. Starck GmbH Goslar	Germany	Compliant
Tantalum	H.C. Starck GmbH Laufenburg	Germany	Compliant
Tantalum	H.C. Starck Hermsdorf GmbH	Germany	Compliant
Tantalum	H.C. Starck Inc.	United States	Compliant
Tantalum	H.C. Starck Ltd.	Japan	Compliant
Tantalum	H.C. Starck Smelting GmbH & Co.KG	Germany	Compliant
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	China	Compliant
Tantalum	Hi-Temp Specialty Metals, Inc.	United States	Compliant
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	China	Compliant
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	China	Compliant
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	China	Compliant
Tantalum	KEMET Blue Metals	Mexico	Compliant
Tantalum	KEMET Blue Powder	United States	Compliant
Tantalum	King-Tan Tantalum Industry Ltd.	China	Compliant
Tantalum	LSM Brasil S.A.	Brazil	Compliant
Tantalum	Metallurgical Products India Pvt., Ltd.	India	Compliant

Mineral	Smelter or Refiner Name	Smelter or Refiner Location	Status
Tantalum	Mineração Taboca S.A.	Brazil	Compliant
Tantalum	Mitsui Mining & Smelting	Japan	Compliant
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	China	Compliant
Tantalum	QuantumClean	United States	Compliant
Tantalum	RFH Tantalum Smeltry Co., Ltd.	China	Compliant
Tantalum	Solikamsk Magnesium Works OAO	Russian Federation	Compliant
Tantalum	Taki Chemicals	Japan	Compliant
Tantalum	Telex Metals	United States	Compliant
Tantalum	Ulba Metallurgical Plant JSC	Kazakhstan	Compliant
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	China	Compliant
Tantalum	Yichun Jin Yang Rare Metal Co., Ltd.	China	Compliant
Tantalum	Zhuzhou Cemented Carbide	China	Compliant
Tantalum	Jiangxi Tuohong New Raw Material	China	Reference List
Tantalum	Jiujiang Tanbre Co., Ltd.	China	Reference List
Tantalum	Molycorp Silmet A.S.	Estonia	Reference List
Tantalum	Plansee SE Liezen	Austria	Reference List
Tantalum	Plansee SE Reutte	Austria	Reference List
Tantalum	Power Resources Ltd	Macedonia	Reference List
Tantalum	Resind Industria e Comercio Ltda	Brazil	Reference List
Tantalum	Tranzact, Inc.	United States	Reference List
Tin	Alpha	United States	Compliant
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	China	Compliant
Tin	China Tin Group Co., Ltd.	China	Compliant
Tin	Cooperativa Metalurgica de Rondônia Ltda.	Brazil	Compliant
Tin	CV Ayi Jaya	Indonesia	Compliant
Tin	CV Dua Sekawan	Indonesia	Compliant
Tin	CV Tiga Sekawan	Indonesia	Compliant
Tin	CV Gita Pesona	Indonesia	Compliant
Tin	CV Serumpun Sebalai	Indonesia	Compliant
Tin	CV United Smelting	Indonesia	Compliant
Tin	CV Venus Inti Perkasa	Indonesia	Compliant
Tin	Dowa	Japan	Compliant
Tin	EM Vinto	Bolivia	Compliant
Tin	Fenix Metals	Poland	Compliant
Tin	Gejiu Fengming Metallurgy Chemical Plant	China	Compliant
Tin	Gejiu Jinye Mineral Company	China	Compliant
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	China	Compliant
Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	China	Compliant
Tin	Guanyang Guida Nonferrous Metal Smelting Plant	China	Compliant
Tin	HuiChang Hill Tin Industry Co., Ltd.	China	Compliant
Tin	Jiangxi Ketai Advanced Material Co., Ltd.	China	Compliant
Tin	Magnu's Minerais Metais e Ligas Ltda.	Brazil	Compliant
Tin	Malaysia Smelting Corporation (MSC)	Malaysia	Compliant

Mineral	Smelter or Refiner Name	Smelter or Refiner Location	Status
Tin	Melt Metais e Ligas S/A	Brazil	Compliant
Tin	Metallic Resources, Inc.	United States	Compliant
Tin	Mineração Taboca S.A.	Brazil	Compliant
Tin	Minsur	Peru	Compliant
Tin	Mitsubishi Materials Corporation	Japan	Compliant
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	Thailand	Compliant
Tin	O.M. Manufacturing Philippines, Inc.	Philippines	Compliant
Tin	Operaciones Metalurgical S.A.	Bolivia	Compliant
Tin	PT Aries Kencana Sejahtera	Indonesia	Compliant
Tin	PT Artha Cipta Langgeng	Indonesia	Compliant
Tin	PT ATD Makmur Mandiri Jaya	Indonesia	Compliant
Tin	PT Babel Inti Perkasa	Indonesia	Compliant
Tin	PT Bangka Prima Tin	Indonesia	Compliant
Tin	PT Bangka Tin Industry	Indonesia	Compliant
Tin	PT Belitung Industri Sejahtera	Indonesia	Compliant
Tin	PT Bukit Timah	Indonesia	Compliant
Tin	PT DS Jaya Abadi	Indonesia	Compliant
Tin	PT Eunindo Usaha Mandiri	Indonesia	Compliant
Tin	PT Inti Stania Prima	Indonesia	Compliant
Tin	PT Kijang Jaya Mandiri	Indonesia	Compliant
Tin	PT Mitra Stania Prima	Indonesia	Compliant
Tin	PT O.M. Indonesia	Indonesia	Compliant
Tin	PT Panca Mega Persada	Indonesia	Compliant
Tin	PT Prima Timah Utama	Indonesia	Compliant
Tin	PT Refined Bangka Tin	Indonesia	Compliant
Tin	PT Sariwiguna Binasentosa	Indonesia	Compliant
Tin	PT Stanindo Inti Perkasa	Indonesia	Compliant
Tin	PT Sukses Inti Makmur	Indonesia	Compliant
Tin	PT Sumber Jaya Indah	Indonesia	Compliant
Tin	PT Timah (Persero) Tbk Kunder	Indonesia	Compliant
Tin	PT Timah (Persero) Tbk Mentok	Indonesia	Compliant
Tin	PT Tinindo Inter Nusa	Indonesia	Compliant
Tin	PT Tommy Utama	Indonesia	Compliant
Tin	Resind Indústria e Comércio Ltda.	Brazil	Compliant
Tin	Rui Da Hung	Taiwan	Compliant
Tin	Soft Metais Ltda.	Brazil	Compliant
Tin	Thaisarco	Thailand	Compliant
Tin	VQB Mineral and Trading Group JSC	Vietnam	Compliant
Tin	White Solder Metalurgia e Mineração Ltda.	Brazil	Compliant
Tin	Yunnan Tin Company Limited	China	Compliant
Tin	Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company	Vietnam	Active
Tin	Gejiu Kai Meng Industry and Trade LLC	China	Active
Tin	Huichang Jinshunda Tin Co., Ltd.	China	Active

Mineral	Smelter or Refiner Name	Smelter or Refiner Location	Status
Tin	Modeltech Sdn Bhd	Malaysia	Active
Tin	Nankang Nanshan Tin Manufactory Co., Ltd.	China	Active
Tin	PT Karimun Mining	Indonesia	Active
Tin	An Thai Minerals Co., Ltd.	Vietnam	Reference List
Tin	An Vinh Joint Stock Mineral Processing Company	Vietnam	Reference List
Tin	CNMC (Guangxi) PGMA Co., Ltd.	China	Reference List
Tin	Elmet S.L.U. (Metallo Group)	Spain	Reference List
Tin	Estanho de Rondônia S.A.	Brazil	Reference List
Tin	Gejiu Zili Mining And Metallurgy Co., Ltd.	China	Reference List
Tin	Linwu Xianggui Ore Smelting Co., Ltd.	China	Reference List
Tin	Metallo-Chimique N.V.	Belgium	Reference List
Tin	Nghe Tinh Non-Ferrous Metals Joint Stock Company	Vietnam	Reference List
Tin	PT Alam Lestari Kencana	Indonesia	Reference List
Tin	PT Bangka Kudai Tin	Indonesia	Reference List
Tin	PT Bangka Timah Utama Sejahtera	Indonesia	Reference List
Tin	PT BilliTin Makmur Lestari	Indonesia	Reference List
Tin	PT Cipta Persada Mulia	Indonesia	Reference List
Tin	PT Fang Di MulTindo	Indonesia	Reference List
Tin	PT Justindo	Indonesia	Reference List
Tin	PT Pelat Timah Nusantara Tbk	Indonesia	Reference List
Tin	PT Seirama Tin Investment	Indonesia	Reference List
Tin	PT Tirus Putra Mandiri	Indonesia	Reference List
Tin	PT Wahana Perkit Jaya	Indonesia	Reference List
Tin	Tuyen Quang Non-Ferrous Metals Joint Stock Company	Vietnam	Reference List
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	China	Reference List
Tungsten	A.L.M.T. TUNGSTEN Corp.	Japan	Compliant
Tungsten	Asia Tungsten Products Vietnam Ltd.	Vietnam	Compliant
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.	China	Compliant
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	China	Compliant
Tungsten	Fujian Jinxin Tungsten Co., Ltd.	China	Compliant
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	China	Compliant
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	China	Compliant
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	China	Compliant
Tungsten	Global Tungsten & Powders Corp.	United States	Compliant
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	China	Compliant
Tungsten	H.C. Starck GmbH	Germany	Compliant
Tungsten	H.C. Starck Smelting GmbH & Co.KG	Germany	Compliant
Tungsten	Hunan Chenzhou Mining Co., Ltd.	China	Compliant
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.	China	Compliant
Tungsten	Hydrometallurg, JSC	Russian Federation	Compliant
Tungsten	Japan New Metals Co., Ltd.	Japan	Compliant
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	China	Compliant
Tungsten	Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd.	China	Compliant

Mineral	Smelter or Refiner Name	Smelter or Refiner Location	Status
Tungsten	Kennametal Huntsville	United States	Compliant
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	China	Compliant
Tungsten	Niagara Refining LLC	United States	Compliant
Tungsten	Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC	Vietnam	Compliant
Tungsten	Tejing (Vietnam) Tungsten Co., Ltd.	Vietnam	Compliant
Tungsten	Vietnam Youngsun Tungsten Industry Co., Ltd.	Vietnam	Compliant
Tungsten	Wolfram Bergbau und Hütten AG	Austria	Compliant
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	China	Compliant
Tungsten	Xiamen Tungsten Co., Ltd.	China	Compliant
Tungsten	Xinhai Rendan Shaoguan Tungsten Co., Ltd.	China	Compliant
Tungsten	Dayu Jincheng Tungsten Industry Co., Ltd.	China	Active
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	China	Active
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	China	Active
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	China	Active
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	China	Active
Tungsten	Kennametal Fallon	United States	Active
Tungsten	Dayu Weiliang Tungsten Co., Ltd.	China	Reference List
Tungsten	Ganxian Shirui New Material Co., Ltd.	China	Reference List
Tungsten	Ganzhou Non-ferrous Metals Smelting Co., Ltd.	China	Reference List
Tungsten	Ganzhou Yatai Tungsten Co., Ltd.	China	Reference List
Tungsten	Hunan Chuangda Vanadium Tungsten Col, Ltd. Wuji	China	Reference List
Tungsten	Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.	China	Reference List
Tungsten	Moliren Ltd	Russian Federation	Reference List
Tungsten	Philippine Chuangxin Industrial Co., Inc.	Philippines	Reference List
Tungsten	Pobedit, JSC	Russian Federation	Reference List
Tungsten	South-East Nonferrous Metal Company Limited of Hengyang City	China	Reference List
Tungsten	Unecha Refractory metals plant	Russian Federation	Reference List
Tungsten	Woltech Korea Co., Ltd.	Republic of Korea	Reference List
Tungsten	Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.	China	Reference List

(1) We note the following in connection with the information contained in the foregoing table:

- (a) All compliance status information in the table is as of May 22, 2017.
- (b) “Compliant” means that a smelter or refiner was listed as compliant with the Conflict-Free Smelter Program’s (“CSFP”) assessment protocols, including through mutual recognition and those indicated as “Re-audit in process.” Included smelters and refiners were not necessarily Compliant for all or part of 2016 and may not continue to be Compliant for any future period. We do not have any information on the origin of the 3TG processed by any of the Compliant smelters and refiners prior to their respective compliance dates.
- (c) “Active” means that the smelter or refiner was listed as having submitted a signed Agreement for the Exchange of Confidential Information and Auditee Agreement contracts to the CFSP or, according to information published

by the CFSI, the smelter has agreed to complete a CFSP validation audit within two years of membership issuance by the Tungsten Industry - Council Minerals Council.

(d) A smelter or refiner is listed as “Reference List” if it was not Compliant or Active.

(e) The compliance status indicated in the table is based solely on information made publicly available by the CFSI, without independent verification by us.

(f) “Country Location” is the location of the smelter or refiner and is based solely on information made publicly available by the CFSI, without independent verification by us.

Country of Origin

The identified countries of origin of the 3TG processed by the Compliant smelters and refiners listed in the table above may have included the countries in the categories listed below. We have not been able to reliably determine the country of origin of the 3TG processed by any of the other smelters and refiners listed in the table. The countries below are categorized by risk.

L1 - Countries that are not identified as conflict regions or plausible areas of smuggling or export from the Covered Countries: Australia, Austria, Benin, Bolivia, Brazil, Burkina Faso, Cambodia, Canada, Chile, China, Colombia, Ecuador, Eritrea, Ethiopia, France, Ghana, Guatemala, Guinea, Guyana, Honduras, India, Indonesia, Japan, Laos, Madagascar, Malaysia, Mali, Mexico, Mongolia, Myanmar, Namibia, Nicaragua, Nigeria, Panama, Peru, Portugal, Russia, Senegal, Sierra Leone, Spain, Thailand, Togo, United States of America, Uzbekistan, Vietnam, Zimbabwe.

L2 - Countries that are known or plausible countries for smuggling, export out of region or transit of materials containing 3TG: Mozambique and South Africa.

L3 - The DRC and its nine adjoining countries: Burundi, Rwanda and Uganda.

DRC - The Democratic Republic of the Congo.

In addition, some of the Compliant smelters and refiners may have sourced in whole or in part from recycled or scrap sources.