

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

**FORM SD  
SPECIALIZED DISCLOSURE REPORT**

**Nova Ltd.**

(Exact name of registrant as specified in its charter)

**Israel**  
(State or other jurisdiction of  
incorporation or organization)

**000-30668**  
(Commission file number)

**98-0601172**  
(IRS Employer Identification No.)

**5 David Fikes St., Rehovot 7632805, Israel**  
(Address of principal executive offices) (Zip code)

**Dror David, +972-73-2295670, +972-8-9407776**  
(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, 2023.

## **SECTION 1 – CONFLICT MINERALS DISCLOSURE**

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

#### **Conflict Minerals Disclosure**

In accordance with Rule 13p-1 of the Securities Exchange Act of 1934, as amended, Nova Ltd. (the “Company”) hereby files this Specialized Disclosure Report on Form SD and the Conflict Minerals Report attached hereto as Exhibit 1.01. The Specialized Disclosure Report on Form SD and Conflict Minerals Report are also available on the Company’s website at: <https://www.novami.com/investors/cg/> under “Investors” —“Corporate Governance” – “Conflict Minerals”. The content of any website referred to in this Form SD (including the exhibit hereto) is included for general information only and is not incorporated by reference into this document.

## **SECTION 2 – RESOURCE EXTRACTION ISSUER DISCLOSURE**

### **Item 2.01 Resource Extraction Issuer Disclosure and Report**

Not applicable.

## **SECTION 3 – EXHIBITS**

### **Item 3.01 Exhibits**

Exhibit 1.01 – Conflict Minerals Report for the reporting period January 1, 2023 to December 31, 2023.

## 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.

**Nova Ltd.**  
(Registrant)

By: /s/ Dror David  
Dror David  
Chief Financial Officer

May 29, 2024  
Date

**Nova Ltd.**  
**Conflict Minerals Report**  
**For the Reporting Period January 1, 2023 to December 31, 2023**

**Introduction**

This Conflict Minerals Report of Nova Ltd. (the “Company”, “our Company”, “Nova”, “we”, “us” or “our”) for the reporting period from January 1, 2023 to December 31, 2023 is presented to comply with Rule 13p-1 under the Securities Exchange Act of 1934, as amended (the “Rule”). The Rule was adopted by the Securities and Exchange Commission (the “SEC”) to implement reporting and disclosure requirements related to conflict minerals as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The Rule imposes certain reporting obligations on SEC registrants whose manufactured products contain cassiterite, columbite-tantalite (coltan), gold, wolframite and their derivatives, which are limited to tin, tantalum, tungsten and gold (“Conflict Minerals”), and which are necessary to the functionality or production of their products. The Rule requires each of these registrants to conduct a reasonable country of origin inquiry (“RCOI”) with respect to the sourcing of the Conflict Minerals that such company uses in its products and, if it has no reason to believe that the Conflict Minerals originated in the Democratic Republic of the Congo (“DRC”) or an adjoining country (the “Covered Countries”), file a description of the inquiry performed and the results of such inquiry on Form SD. If after conducting a RCOI as required by SEC rules a registrant has reason to believe that any of the Conflict Minerals in its supply chain may have originated in the DRC or Covered Countries, or if it is unable to determine the country of origin of those Conflict Minerals, then the registrant must exercise due diligence with respect to the source and chain of custody of the Conflict Minerals in order to determine whether or not such Conflict Minerals directly or indirectly financed or benefited armed groups in the DRC or Covered Countries, and describe such due diligence measures in a Conflict Minerals Report that is included as an exhibit to its Form SD.

Nova is committed to responsible sourcing of minerals and has taken action to increase transparency in its supply chain and ensure responsible procurement by its suppliers and sub-suppliers. Nova has adopted a policy with respect to the sourcing of Conflict Minerals, which is available on its website at: <https://www.novami.com/investors/cg/> under “Investors” — “Corporate Governance” – “Conflict Minerals”. The content of any website referred to in this Conflict Minerals Report is included for general information only and is not incorporated by reference into this document.

Consistent with the Rule and the SEC’s statement on April 29, 2014 relating to the Rule, this Conflict Minerals Report has not been audited by an independent private sector auditor.

**Company and Products Overview**

We are a leading innovator and a key provider of metrology solutions for advanced process control used in semiconductor manufacturing. We offer several metrology solutions, mainly by using optical and x-ray technologies, delivering unique measurement solutions to measure the most advanced semiconductor technology nodes. Our metrology systems measure various film thickness and composition properties as well as critical-dimension (CD) variables during various front-end and back-end of line steps in the semiconductor wafer fabrication process, allowing semiconductor manufacturers to improve quality, productivity and yields, lower manufacturing costs and increase profitability. We supply our metrology solutions to major semiconductor manufacturers worldwide and serve customers from offices in Taiwan, the Republic of Korea, China, Japan, the United States and Europe.

The scope of this report includes all of our consolidated businesses and subsidiaries for the year 2023, including one manufacturing facility for our Optical CD product lines, which is located in Ness-Ziona, Israel, and one manufacturing facility for our x-ray product line, which is located in Fremont, California, in the United States. This report refers to the purchase of parts and sub-assemblies (“Components”) used for our manufacturing facilities in both Israel and California. During 2023, all such Components were purchased from third parties and were delivered to these facilities, where they were integrated into complete systems that constitute the tools that we sold to others. Following the acquisition of ancossys GmbH in January 2022, and its merger into Nova Measuring Instruments GmbH in June 2023, we have expanded our technology offering by adding Chemical Analytical methods with applications of Chemical metrology in various steps..

Because metals such as tin, tantalum, tungsten and gold that are included in the definition of Conflict Minerals are generally contained in our Components, we believe that our products contain Conflict Minerals that are necessary for the functionality or production of our products.

### **Reasonable Country of Origin Inquiry (“RCOI”)**

Because we believe that Conflict Minerals were necessary to the functionality or production of products manufactured, or contracted to be manufactured, by us during 2023, we performed an RCOI to determine whether the Conflict Minerals in such products originated from the DRC or Covered Countries and whether such Conflict Minerals come from recycled or scrap sources.

The products that we manufacture, or contract to manufacture, are highly complex, and typically contain thousands of Components from many manufacturers. We have an extensive and varied supply chain and do not have a direct relationship with Conflict Minerals smelters or refiners. In this regard, we do not purchase Conflict Minerals directly from mines, smelters or refiners, and there are many third parties in the supply chain between the original sources of Conflict Minerals and the ultimate manufacture of our products. Accordingly, to gather information from our suppliers, we utilize a standard template for Conflict Minerals reporting designed by the Responsible Minerals Initiative (“RMI”) known as the Conflict Minerals Reporting Template (the “CMRT”). We relied on our suppliers to complete the CMRT in order to provide information on the origin of the Conflict Minerals contained in Components supplied to us – including information regarding the sources of Conflict Minerals that are supplied to our suppliers from lower tiers in the chain (i.e., sub-suppliers). In addition, with respect to the certification of smelters or refiners as conflict-free, we have relied upon the latest findings of the RMI’s Responsible Minerals Assurance Process (the “RMAP”).

The RCOI undertaken by us in 2023 consisted of sending letters and CMRTs to 39 of our largest first-tier suppliers that we concluded were providing us with Components that do, or may, contain Conflict Minerals that are necessary for the functionality or production of our products and that accounted for approximately 85% of all our applicable 2023 product material expenditures. These suppliers include our turnkey suppliers, which means that they are in direct contact with our supply chain management team, and are considered to be our strategic partners, having long-term relationships with our Company. The letters we sent to such suppliers explained the Rule and referred the suppliers to online training materials and instructions, sought their support and cooperation in our efforts in connection with Conflict Minerals, provided a copy of our Conflict Minerals policy, and asked them to complete the CMRT. Working with a third-party service provider to conduct the survey and compile the survey results, we reviewed the responses and followed up as necessary by sending periodic reminders to non-responsive suppliers and following up on responses that appeared to be inconsistent, incomplete or inaccurate. In the end, the response rate from suppliers asked to participate was 89%.

Based on information obtained in the RCOI, and taking into account the complexities of our supply chain, we concluded that we did not have sufficient information to determine the country of origin of the Conflict Minerals in our products and were unable to rule out the possibility that Conflict Minerals used in our products originated, or may have originated, from the DRC or Covered Countries. Therefore, in accordance with the Rule, we undertook due diligence on the source and chain of custody of the Conflict Minerals that were necessary to the functionality or production of our products during 2023. There is significant overlap between our RCOI efforts and our due diligence measures performed.

### **Due Diligence**

#### **Design of Due Diligence Framework**

Our due diligence measures have been designed, in all material respects, to conform as far as practicable with the internationally recognized due diligence framework prescribed by the Organization for Economic Co-operation and Development (“OECD”), known as “Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas” and related supplements for Conflict Minerals (the “OECD Guidance”).

## Due Diligence Measures Performed

In substantial conformance with the OECD Guidance, our due diligence efforts for calendar year 2023 included the following steps:

### *Step 1. Establish Strong Company Management Systems*

- Conflict Minerals steering committee: A cross-functional Conflict Minerals steering committee operates our Conflict Minerals program. The committee consists of representatives from the following areas: operations (purchasing and engineering); and legal and compliance. Regular meetings of our Conflict Minerals steering committee were held, and the committee periodically updated representatives of our senior management on the status of the Conflict Minerals program.
- Conflict Minerals Policy: Our Conflict Minerals policy (the “Policy”), adopted in 2015, has been communicated both throughout our Company and to suppliers, and is publicly available on our Company’s website at: : <https://www.novami.com/investors/cg/> under “Investors” —“Corporate Governance” – “Conflict Minerals”.
- Supplier engagement: We sent letters and CMRTs to a substantial portion of our first-tier suppliers identified during an applicability assessment phase as providing Components that do, or may, contain Conflict Minerals that are necessary for the functionality or production of our products. The aforementioned letters advised the suppliers of our commitment to responsible sourcing of minerals and indicated that their cooperation in the due diligence efforts is expected, including by completion of the CMRT.

In addition, we made training materials available to those first-tier suppliers that included an overview of the Rule and instructions on how to complete the CMRT survey.

For each purchase order issued by our computerized purchase order system for purchasing Components, suppliers are required to accept our terms and conditions, which include, among others, that (i) upon request, a supplier shall provide us with information regarding its products that contain Conflict Minerals, and (ii) in certain cases, we reserve the right to immediately terminate the purchase order and cease all procurement activity with the supplier.

### *Step 2. Identify and Assess Risks in the Supply Chain*

We identified and assessed risk in our supply chain as follows: First, we identified our major first-tier (i.e., direct) suppliers that provide Components that potentially incorporate Conflict Minerals that are necessary to the functionality or production of our products that we manufactured, or contracted to manufacture, in 2023 (and which accounted for a substantial portion of all applicable expenditures on Components by our Company in 2023). We then requested information from relevant suppliers regarding the source and chain of custody of Conflict Minerals in their supply chain. To facilitate the collection of complete, accurate, standardized and verifiable information, we relied primarily on the CMRT, which seeks information regarding country of origin of Conflict Minerals, mine location and smelters or refiners used.

We reviewed suppliers’ responses in order to track information regarding smelters or refiners of Conflict Minerals in our supply chain that have not received a conflict-free designation based on the RMAP.

### *Step 3. Design and Implement a Strategy to Respond to Identified Risks*

We initiated a supply chain survey with selected suppliers using the CMRT in order to identify those smelters or refiners that supplied Conflict Minerals used in our products. We monitored and tracked our performance in this area by reviewing supplier responses. Each CMRT completed by a supplier was entered into a database maintained by a third-party service provider and reviewed. For suppliers that provided unclear or incomplete responses, an escalation process was used in order to obtain complete and accurate required information, sometimes requiring multiple telephone and/or email contacts to further the data collection process. Our Conflict Minerals steering committee held regular meetings to review progress and assess the risks identified.

In addition, smelters or refiners that were identified in the suppliers’ responses were compared against the list of facilities that have received a conflict-free designation from the RMAP (“conflict-free” meaning generally that they did not directly or indirectly finance or benefit armed groups in the Covered Countries), and country of origin information for the smelters or refiners identified by the supply chain responses were reviewed using RMAP data. In accordance with our risk management plan, we contacted suppliers that have been identified as having non-certified smelters or refiners within the smelters or refiners list that they have provided to us.

Finally, representatives of our senior management were briefed about our due diligence efforts and findings on a regular basis.

#### *Step 4. Carry Out Independent Third-Party Audit of Smelter/Refiner's Due Diligence Practices*

We are several steps away in the supply chain from smelters or refiners that process the Conflict Minerals used in our products, do not have any direct relationships with such smelters or refiners and did not obtain from a third party or perform ourselves a direct audit of smelters or refiners within our supply chain. Instead, we relied on conflict-free designations based on the activities of other organizations such as the RMI (through the RMAP).

#### *Step 5. Report Annually on Supply Chain Due Diligence*

We report annually on our supply chain due diligence, as required by the Rule, and have posted our Form SD and Conflict Minerals Report on our website at : <https://www.novami.com/investors/cg/> under “Investors” —“Corporate Governance” – “Conflict Minerals”.

### **Results of Assessment**

On account of incomplete information, we are unable at this time to determine and describe with complete certainty in this report a complete list of either the facilities used to process the Conflict Minerals used in our products or the countries of origin of those Conflict Minerals. We have, nevertheless, described below the results of our assessment on the source of the Conflict Minerals, to the extent that we received information from our relevant suppliers through our due diligence efforts.

As indicated above, the products that we manufacture, or contract to manufacture, are highly complex, and typically contain thousands of Components from many suppliers. Because there are generally multiple tiers between the mines that extract Conflict Minerals and our suppliers, we relied on our suppliers to provide information on the origin of the Conflict Minerals contained in Components supplied to us.

In all, we surveyed 39 suppliers to whom we paid approximately 85% of the applicable expenditures by our Company on Component costs for our products in 2023. 89% of the suppliers whom we surveyed provided a complete response.

As part of our due diligence efforts and based on the information received from our suppliers, we identified 349 smelters or refiners of Conflict Minerals used generally in their supply chains, of which 64% have been certified as conflict free by the RMI's RMAP, and of which 1.15% are currently engaged in the RMI audit process. A list of these identified smelters or refiners is provided in [Appendix A](#) hereto.

Some suppliers were unable to provide a complete list of smelters or refiners. In addition, despite receiving information regarding smelters or refiners used generally by some suppliers in their supply chains, these suppliers were unable to report which smelters or refiners were part of the supply chain applicable to the specific Components that were sold to us. Furthermore, for the significant majority of smelters reported by these suppliers, there is inadequate information available to assess the source of the conflict minerals that they process. As a result, we are unable to identify with complete accuracy the country of origin of the Conflict Minerals used in our products in 2023 and we concluded in good faith that we lack sufficient information to trace the chain of custody of any Conflict Minerals contained in our products in 2023 up through the supply chain to a specific smelter or, in turn, to a country or mine of origin. We have, however, become aware that certain smelters or refiners from Covered Countries that have been identified as part of the supply chain of our suppliers have not been certified as conflict free under the RMI's RMAP. We have therefore activated our risk management procedures in respect of those smelters or refiners, and have approached the supplier that provided us the relevant Conflict Minerals sourced from those smelters or refiners and have asked for corrective action to be taken.

We furthermore note that information is not gathered from our suppliers on a continuous, real-time basis. We can therefore only provide reasonable, not absolute, assurance regarding the source and chain of custody of the Conflict Minerals used in our products, since the information comes from direct suppliers, not the underlying smelters or refiners, and is based on independent third-party audit programs, not our own auditing.

## **Continuous Efforts to Mitigate Risk**

We intend to maintain our approach for responsible sourcing of the minerals used in our products and to continue to comply with any applicable regulations related to the sourcing of, and disclosure concerning, the Conflict Minerals that may be contained in our products.

## **Forward Looking Statements**

Forward-looking statements in this Conflict Minerals Report are made pursuant to the safe harbor provisions of Section 21E of the Securities Exchange Act of 1934, as amended, and other federal securities laws. Investors are cautioned that statements in this Conflict Minerals Report that are not strictly historical statements, including without limitation, the Company's intentions and expectations regarding further supplier engagement, due diligence and risk mitigation efforts and strategy, constitute forward looking statements that involve risks and uncertainties. Actual results could differ materially from the forward-looking statements. Words such as "expects," "anticipates," "intends," variations of these words, and similar expressions, are intended to identify such forward looking statements. Risks and uncertainties that could cause actual results to differ include, without limitation, risks and uncertainties associated with the progress of industry and other supply chain transparency and smelter or refiner validation programs for Conflict Minerals (including the possibility of inaccurate information, fraud and other irregularities), inadequate supplier education and knowledge, limitations on the ability or willingness of suppliers to provide more accurate, complete and detailed information and limitations on the Company's ability to verify the accuracy or completeness of any supply chain information provided by suppliers or others. Except as otherwise required by law, the Company undertakes no obligation to update publicly the information contained in this Conflict Minerals Report, or any forward-looking statements, to reflect new information, events or circumstances after the date they were made, or to reflect the occurrence of unanticipated events.



## Appendix A

### List of Identified Smelters or Refiners

| <b>Smelter Metal</b> | <b>Smelter Look-up (known smelters by RMI)</b>                  | <b>Smelter Country</b>   |
|----------------------|---|--------------------------|
| Gold                 | Advanced Chemical Company                                       | UNITED STATES OF AMERICA |
| Gold                 | Aida Chemical Industries Co., Ltd.                              | JAPAN                    |
| Gold                 | Agosi AG  | GERMANY                  |
| Gold                 | Almalyk Mining and Metallurgical Complex (AMMC)                 | UZBEKISTAN               |
| Gold                 | AngloGold Ashanti Corrego do Sitio Mineracao                    | BRAZIL                   |
| Gold                 | Argor-Heraeus S.A.  | SWITZERLAND              |
| Gold                 | Asahi Pretec Corp.  | JAPAN                    |
| Gold                 | Asaka Riken Co., Ltd.   | JAPAN                    |
| Gold                 | Atasay Kuyumculuk Sanayi Ve Ticaret A.S.                        | TURKEY                   |
| Gold                 | Aurubis AG  | GERMANY                  |
| Gold                 | Bangko Sentral ng Pilipinas (Central Bank of the Philippines)   | PHILIPPINES              |
| Gold                 | Boliden AB  | SWEDEN                   |
| Gold                 | C. Hafner GmbH + Co. KG   | GERMANY                  |
| Gold                 | Caridad   | MEXICO                   |
| Gold                 | CCR Refinery - Glencore Canada Corporation                      | CANADA                   |
| Gold                 | Cendres + Metaux S.A.   | SWITZERLAND              |
| Gold                 | Yunnan Copper Industry Co., Ltd.                                | CHINA                    |
| Gold                 | Chimet S.p.A.   | ITALY                    |
| Gold                 | Chugai Mining   | JAPAN                    |
| Gold                 | Daye Non-Ferrous Metals Mining Ltd.                             | CHINA                    |
| Gold                 | DSC (Do Sung Corporation)                                       | KOREA, REPUBLIC OF       |
| Gold                 | Dowa  | JAPAN                    |
| Gold                 | Eco-System Recycling Co., Ltd. East Plant                       | JAPAN                    |
| Gold                 | JSC Novosibirsk Refinery  | RUSSIAN FEDERATION       |
| Gold                 | Refinery of Seemine Gold Co., Ltd.                              | CHINA                    |
| Gold                 | Guoda Safina High-Tech Environmental Refinery Co., Ltd.         | CHINA                    |
| Gold                 | Hangzhou Fuchunjiang Smelting Co., Ltd.                         | CHINA                    |
| Gold                 | LT Metal Ltd.   | KOREA, REPUBLIC OF       |
| Gold                 | Heimerle + Meule GmbH   | GERMANY                  |
| Gold                 | Heraeus Metals Hong Kong Ltd.                                   | CHINA                    |
| Gold                 | Heraeus Germany GmbH Co. KG                                     | GERMANY                  |
| Gold                 | Hunan Chenzhou Mining Co., Ltd.                                 | CHINA                    |
| Gold                 | Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd.             | CHINA                    |
| Gold                 | HwaSeong 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 | Asahi Refining USA Inc.   | UNITED STATES OF AMERICA |
| Gold | Asahi Refining Canada Ltd.  | CANADA                   |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant                         | RUSSIAN FEDERATION       |
| Gold | JSC Uralelectromed  | RUSSIAN FEDERATION       |
| Gold | JX Nippon Mining & Metals Co., Ltd.   | JAPAN                    |
| Gold | Kazakhmys Smelting LLC  | KAZAKHSTAN               |
| Gold | Kazzinc   | KAZAKHSTAN               |
| Gold | Kennecott Utah Copper LLC   | UNITED STATES OF AMERICA |
| Gold | Kojima Chemicals Co., Ltd.  | JAPAN                    |
| Gold | Kyrgyzaltyn JSC   | KYRGYZSTAN               |
| Gold | L'azurde Company For Jewelry  | SAUDI ARABIA             |
| Gold | Lingbao Gold Co., Ltd.  | CHINA                    |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd.                                  | CHINA                    |
| Gold | LS-NIKKO Copper Inc.  | KOREA, REPUBLIC OF       |
| Gold | Luoyang Zijin Yinhuai Gold Refinery Co., Ltd.                               | CHINA                    |
| Gold | Materion  | UNITED STATES OF AMERICA |
| Gold | Matsuda Sangyo Co., Ltd.  | JAPAN                    |
| Gold | Metalor Technologies (Suzhou) Ltd.  | CHINA                    |
| Gold | Metalor Technologies (Hong Kong) Ltd.                                       | CHINA                    |
| Gold | Metalor Technologies (Singapore) Pte., Ltd.                                 | SINGAPORE                |
| Gold | Metalor Technologies S.A.   | SWITZERLAND              |
| Gold | Metalor USA Refining Corporation  | UNITED STATES OF AMERICA |
| Gold | Metalurgica Met-Mex Penoles S.A. De C.V.                                    | MEXICO                   |
| Gold | Mitsubishi Materials Corporation  | JAPAN                    |
| Gold | Mitsui Mining and Smelting Co., Ltd.  | JAPAN                    |
| Gold | Moscow Special Alloys Processing Plant                                      | RUSSIAN FEDERATION       |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.S.                                      | TURKEY                   |
| Gold | Navoi Mining and Metallurgical Combinat                                     | UZBEKISTAN               |
| Gold | Nihon Material Co., Ltd.  | JAPAN                    |
| Gold | Ohura Precious Metal Industry Co., Ltd.                                     | JAPAN                    |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | RUSSIAN FEDERATION       |
| Gold | MKS PAMP SA   | SWITZERLAND              |
| Gold | Penglai Penggang Gold Industry Co., Ltd.                                    | CHINA                    |
| Gold | Prioksky Plant of Non-Ferrous Metals  | RUSSIAN FEDERATION       |
| Gold | PT Aneka Tambang (Persero) Tbk  | INDONESIA                |
| Gold | PX Precinox S.A.  | SWITZERLAND              |
| Gold | Rand Refinery (Pty) Ltd.  | SOUTH AFRICA             |
| Gold | Royal Canadian Mint   | CANADA                   |
| Gold | Sabin Metal Corp.   | UNITED STATES OF AMERICA |
| Gold | Samduck Precious Metals   | KOREA, REPUBLIC OF       |
| Gold | Samwon Metals Corp.   | KOREA, REPUBLIC OF       |
| Gold | SEMPSA Joyeria Plateria S.A.  | SPAIN                    |

|      |   |                           |
|------|---|---------------------------|
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | CHINA                     |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.       | CHINA                     |
| Gold | Sichuan Tianze Precious Metals Co., Ltd.                | CHINA                     |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals    | RUSSIAN FEDERATION        |
| Gold | Solar Applied Materials Technology Corp.                | TAIWAN, PROVINCE OF CHINA |
| Gold | Sumitomo Metal Mining Co., Ltd.                         | JAPAN                     |
| Gold | Super Dragon Technology Co., Ltd.                       | TAIWAN, PROVINCE OF CHINA |
| Gold | Tanaka Kikinzoku Kogyo K.K.                             | JAPAN                     |
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM            | CHINA                     |
| Gold | Shandong Gold Smelting Co., Ltd.                        | CHINA                     |
| Gold | Tokuriki Honten Co., Ltd.                               | JAPAN                     |
| Gold | Tongling Nonferrous Metals Group Co., Ltd.              | CHINA                     |
| Gold | Torecom   | KOREA, REPUBLIC OF        |
| Gold | Umicore S.A. Business Unit Precious Metals Refining     | BELGIUM                   |
| Gold | United Precious Metal Refining, Inc.                    | UNITED STATES OF AMERICA  |
| Gold | Valcambi S.A.   | SWITZERLAND               |
| Gold | Western Australian Mint (T/a The Perth Mint)            | AUSTRALIA                 |
| Gold | Yamakin Co., Ltd.                                       | JAPAN                     |
| Gold | Yokohama Metal Co., Ltd.                                | JAPAN                     |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation     | CHINA                     |
| Gold | Gold Refinery of Zijin Mining Group Co., Ltd.           | CHINA                     |
| Gold | Morris and Watson                                       | NEW ZEALAND               |
| Gold | SAFINA A.S.   | CZECHIA                   |
| Gold | Guangdong Jinding Gold Limited                          | CHINA                     |
| Gold | Umicore Precious Metals Thailand                        | THAILAND                  |
| Gold | Geib Refining Corporation                               | UNITED STATES OF AMERICA  |
| Gold | MMTC-PAMP India Pvt., Ltd.                              | INDIA                     |
| Gold | KGHM Polska Miedz Spolka Akcyjna                        | POLAND                    |
| Gold | Fidelity Printers and Refiners Ltd.                     | ZIMBABWE                  |
| Gold | Singway Technology Co., Ltd.                            | TAIWAN, PROVINCE OF CHINA |
| Gold | Shandong Humon Smelting Co., Ltd.                       | CHINA                     |
| Gold | Shenzhen Zhonghenglong Real Industry Co., Ltd.          | CHINA                     |
| Gold | Al Etihad Gold Refinery DMCC                            | UNITED ARAB EMIRATES      |
| Gold | Emirates Gold DMCC                                      | UNITED ARAB EMIRATES      |
| Gold | International Precious Metal Refiners                   | UNITED ARAB EMIRATES      |
| Gold | Kaloti Precious Metals                                  | UNITED ARAB EMIRATES      |
| Gold | Sudan Gold Refinery                                     | SUDAN                     |
| Gold | T.C.A S.p.A   | ITALY                     |
| Gold | REMONDIS PMR B.V.                                       | NETHERLANDS               |
| Gold | Fujairah Gold FZC                                       | UNITED ARAB EMIRATES      |
| Gold | Industrial Refining Company                             | BELGIUM                   |
| Gold | Korea Zinc Co., Ltd.                                    | KOREA, REPUBLIC OF        |
| Gold | Marsam Metals   | BRAZIL                    |
| Gold | TOO Tau-Ken-Altyn                                       | KAZAKHSTAN                |

|      |  |                          |
|------|--|--------------------------|
| Gold | Abington Reldan Metals, LLC  | UNITED STATES OF AMERICA |
| Gold | SAAMP  | FRANCE                   |
| Gold | L'Orfebre S.A.   | ANDORRA                  |
| Gold | 8853 S.p.A.  | ITALY                    |
| Gold | Italpreziosi   | ITALY                    |
| Gold | WIELAND Edelmetalle GmbH   | GERMANY                  |
| Gold | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH          | AUSTRIA                  |
| Gold | AU Traders and Refiners  | SOUTH AFRICA             |
| Gold | GGC Gujrat Gold Centre Pvt. Ltd.                                     | INDIA                    |
| Gold | Sai Refinery   | INDIA                    |
| Gold | Modeltech Sdn Bhd  | MALAYSIA                 |
| Gold | Bangalore Refinery   | INDIA                    |
| Gold | Kyshtym Copper-Electrolytic Plant ZAO                                | RUSSIAN FEDERATION       |
| Gold | Degussa Sonne / Mond Goldhandel GmbH                                 | GERMANY                  |
| Gold | Pease & Curren   | UNITED STATES OF AMERICA |
| Gold | SungEel HiMetal Co., Ltd.  | KOREA, REPUBLIC OF       |
| Gold | Planta Recuperadora de Metales SpA                                   | CHILE                    |
| Gold | Safimet S.p.A  | ITALY                    |
| Gold | State Research Institute Center for Physical Sciences and Technology | LITHUANIA                |
| Gold | African Gold Refinery  | UGANDA                   |
| Gold | NH Recytech Company  | KOREA, REPUBLIC OF       |
| Gold | QG Refining, LLC   | UNITED STATES OF AMERICA |
| Gold | Dijllah Gold Refinery FZC  | UNITED ARAB EMIRATES     |
| Gold | Coimpa Industrial LTDA   | BRAZIL                   |
| Gold | Dongwu Gold Group  | CHINA                    |
| Gold | Gold by Gold Colombia  | COLOMBIA                 |
| Gold | Value Trading  | BELGIUM                  |
| Gold | WEEEREFINING   | FRANCE                   |
| Gold | Metal Concentrators SA (Pty) Ltd.                                    | SOUTH AFRICA             |
| Gold | Metallix Refining Inc.   | UNITED STATES OF AMERICA |
| Gold | MD Overseas  | INDIA                    |
| Gold | Sellem Industries Ltd.   | MAURITANIA               |
| Gold | Sancus ZFS (L  | COLOMBIA                 |
| Gold | Alexy Metals   | UNITED STATES OF AMERICA |
| Gold | K.A. Rasmussen   | NORWAY                   |
| Gold | Emerald Jewel Industry India Limited (Unit 4)                        | INDIA                    |
| Gold | Emerald Jewel Industry India Limited (Unit 3)                        | INDIA                    |
| Gold | Emerald Jewel Industry India Limited (Unit 2)                        | INDIA                    |
| Gold | Emerald Jewel Industry India Limited (Unit 1)                        | INDIA                    |
| Gold | Kundan Care Products Ltd.  | INDIA                    |
| Gold | Augmont Enterprises Private Limited                                  | INDIA                    |
| Gold | Eco-System Recycling Co., Ltd. West Plant                            | JAPAN                    |
| Gold | Eco-System Recycling Co., Ltd. North Plant                           | JAPAN                    |

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| Gold     | C.I Metales Procesados Industriales SAS       | COLOMBIA                     |
| Gold     | Sovereign Metals                              | INDIA                        |
| Gold     | CGR Metalloys Pvt Ltd.                        | INDIA                        |
| Gold     | DS PRETECH Co., Ltd.                          | KOREA, REPUBLIC OF           |
| Gold     | Gold Coast Refinery                           | GHANA                        |
| Gold     | ABC Refinery Pty Ltd.                         | AUSTRALIA                    |
| Gold     | JALAN & Company                               | INDIA                        |
| Gold     | Morris and Watson Gold Coast                  | AUSTRALIA                    |
| Gold     | Universal Precious Metals Refining Zambia     | ZAMBIA                       |
| Gold     | Metahub Industries Sdn. Bhd.                  | MALAYSIA                     |
| Gold     | SAXONIA Edelmetalle GmbH                      | GERMANY                      |
| Gold     | Albino Mountinho Lda.                         | PORTUGAL                     |
| Gold     | Shenzhen CuiLu Gold Co., Ltd.                 | CHINA                        |
| Gold     | Shirpur Gold Refinery Ltd.                    | INDIA                        |
| Gold     | Republic Metals Corporation                   | UNITED STATES OF AMERICA     |
| Gold     | Faggi Enrico S.p.A.                           | ITALY                        |
| Gold     | Umicore Brasil Ltda.                          | BRAZIL                       |
| Gold     | So Accurate Group, Inc.                       | UNITED STATES OF AMERICA     |
| Gold     | Schone Edelmetaal B.V.                        | NETHERLANDS                  |
| Gold     | OJSC Kolyma Refinery                          | RUSSIAN FEDERATION           |
| Gold     | Elemental Refining, LLC                       | UNITED STATES OF AMERICA     |
| Gold     | Korea Metal Co., Ltd.                         | KOREA, REPUBLIC OF           |
| Gold     | DODUCO Contacts and Refining GmbH             | GERMANY                      |
| Gold     | Daejin Indus Co., Ltd.                        | KOREA, REPUBLIC OF           |
| Gold     | Bauer Walser AG                               | GERMANY                      |
| Gold     | Allgemeine Gold-und Silberscheideanstalt A.G. | GERMANY                      |
| Gold     | Aktyubinsk Copper Company TOO                 | KAZAKHSTAN                   |
| Gold     | KP Sanghvi International Airport              | INDIA                        |
| Gold     | GG Refinery Ltd.                              | TANZANIA, UNITED REPUBLIC OF |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd.     | CHINA                        |
| Tantalum | F&X Electro-Materials Ltd.                    | CHINA                        |
| Tantalum | XIMEI RESOURCES (GUANGDONG) LIMITED           | CHINA                        |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd.   | CHINA                        |
| Tantalum | Jiujiang Tanbre Co., Ltd.                     | CHINA                        |
| Tantalum | AMG Brasil                                    | BRAZIL                       |
| Tantalum | Metallurgical Products India Pvt., Ltd.       | INDIA                        |
| Tantalum | Mineracao Taboca S.A.                         | BRAZIL                       |
| Tantalum | NPM Silmet AS                                 | ESTONIA                      |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd.    | CHINA                        |
| Tantalum | QuantumClean                                  | UNITED STATES OF AMERICA     |
| Tantalum | Yanling Jincheng Tantalum & Niobium Co., Ltd. | CHINA                        |
| Tantalum | Solikamsk Magnesium Works OAO                 | RUSSIAN FEDERATION           |
| Tantalum | Taki Chemical Co., Ltd.                       | JAPAN                        |

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| Tantalum | Telex Metals   | UNITED STATES OF AMERICA                        |
| Tantalum | Ulba Metallurgical Plant JSC                         | KAZAKHSTAN                                      |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd.    | CHINA   |
| Tantalum | D Block Metals, LLC                                  | UNITED STATES OF AMERICA                        |
| Tantalum | FIR Metals & Resource Ltd.                           | CHINA   |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd.        | CHINA   |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd.        | CHINA   |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd.         | CHINA   |
| Tantalum | KEMET de Mexico                                      | MEXICO  |
| Tantalum | TANIOBIS Co., Ltd.                                   | THAILAND  |
| Tantalum | TANIOBIS GmbH  | GERMANY   |
| Tantalum | Materion Newton Inc.                                 | UNITED STATES OF AMERICA                        |
| Tantalum | TANIOBIS Japan Co., Ltd.                             | JAPAN   |
| Tantalum | TANIOBIS Smelting GmbH & Co. KG                      | GERMANY   |
| Tantalum | Global Advanced Metals Boyertown                     | UNITED STATES OF AMERICA                        |
| Tantalum | Global Advanced Metals Aizu                          | JAPAN   |
| Tantalum | Resind Industria e Comercio Ltda.                    | BRAZIL  |
| Tantalum | Jiangxi Tuohong New Raw Material                     | CHINA   |
| Tantalum | PowerX Ltd.  | RWANDA  |
| Tantalum | XIMEI RESOURCES(GUIZHOU) TECHNOLOGY CO., LTD.        | CHINA   |
| Tantalum | 5D Production OU                                     | ESTONIA   |
| Tantalum | Yancheng Jinye New Material Technology Co., Ltd.     | CHINA   |
| Tantalum | V&D New Materials (Jiangsu) Co., Ltd.                | CHINA   |
| Tantalum | CP Metals Inc.                                       | UNITED STATES OF AMERICA                        |
| Tantalum | Jiujiang Janny New Material Co., Ltd.                | CHINA   |
| Tantalum | RFH Metals & Chemicals Co., Ltd.                     | CHINA   |
| Tantalum | Power Resources Ltd.                                 | MACEDONIA, THE FORMER<br>YUGOSLAV REPUBLIC OF   |
| Tantalum | Avon Specialty Metals Ltd                            | UNITED KINGDOM OF GREAT<br>BRITAIN AND NORTHERN |
| Tantalum | E.S.R. Electronics                                   | UNITED STATES OF AMERICA                        |
| Tantalum | Tranzact, Inc.                                       | UNITED STATES OF AMERICA                        |
| Tantalum | KEMET Blue Powder                                    | UNITED STATES OF AMERICA                        |
| Tantalum | Taike Technology(Suzhou)Co.,Ltd.                     | CHINA   |
| Tantalum | Plansee SE Reutte                                    | AUSTRIA   |
| Tantalum | H.C. Starck Hermsdorf GmbH                           | GERMANY   |
| Tantalum | H.C. Starck GmbH Laufenburg                          | GERMANY   |
| Tantalum | Plansee SE Liezen                                    | AUSTRIA   |
| Tantalum | Guizhou Zhenhua Xinyun Technology Ltd., Kaili branch | CHINA   |
| Tantalum | Yichun Jin Yang Rare Metal Co., Ltd.                 | CHINA   |
| Tantalum | Zhuzhou Cemented Carbide Group Co., Ltd.             | CHINA   |
| Tantalum | King-Tan Tantalum Industry Ltd.                      | CHINA   |
| Tantalum | Hi-Temp Specialty Metals, Inc.                       | UNITED STATES OF AMERICA                        |
| Tantalum | Exotech Inc.   | UNITED STATES OF AMERICA                        |

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| Tantalum | Duoluoshan  | CHINA                            |
| Tantalum | Guangdong Rising Rare Metals-EO Materials Ltd.    | CHINA                            |
| Tantalum | H.C. Starck GmbH                                  | GERMANY                          |
| Tin      | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | CHINA                            |
| Tin      | Alpha   | UNITED STATES OF AMERICA         |
| Tin      | PT Aries Kencana Sejahtera                        | INDONESIA                        |
| Tin      | EM Vinto  | BOLIVIA (PLURINATIONAL STATE OF) |
| Tin      | Estanho de Rondonia S.A.                          | BRAZIL                           |
| Tin      | Fenix Metals                                      | POLAND                           |
| Tin      | Gejiu Non-Ferrous Metal Processing Co., Ltd.      | CHINA                            |
| Tin      | Gejiu Zili Mining And Metallurgy Co., Ltd.        | CHINA                            |
| Tin      | Gejiu Kai Meng Industry and Trade LLC             | CHINA                            |
| Tin      | China Tin Group Co., Ltd.                         | CHINA                            |
| Tin      | Malaysia Smelting Corporation (MSC)               | MALAYSIA                         |
| Tin      | Metallic Resources, Inc.                          | UNITED STATES OF AMERICA         |
| Tin      | Minsur  | PERU                             |
| Tin      | Jiangxi New Nanshan Technology Ltd.               | CHINA                            |
| Tin      | O.M. Manufacturing (Thailand) Co., Ltd.           | THAILAND                         |
| Tin      | Operaciones Metalurgicas S.A.                     | BOLIVIA (PLURINATIONAL STATE OF) |
| Tin      | PT Artha Cipta Langgeng                           | INDONESIA                        |
| Tin      | PT Babel Inti Perkasa                             | INDONESIA                        |
| Tin      | PT Babel Surya Alam Lestari                       | INDONESIA                        |
| Tin      | PT Belitung Industri Sejahtera                    | INDONESIA                        |
| Tin      | PT Bukit Timah                                    | INDONESIA                        |
| Tin      | PT Mitra Stania Prima                             | INDONESIA                        |
| Tin      | PT Panca Mega Persada                             | INDONESIA                        |
| Tin      | PT Prima Timah Utama                              | INDONESIA                        |
| Tin      | PT Refined Bangka Tin                             | INDONESIA                        |
| Tin      | PT Sariwiguna Binasentosa                         | INDONESIA                        |
| Tin      | PT Stanindo Inti Perkasa                          | INDONESIA                        |
| Tin      | PT Timah Tbk Kundur                               | INDONESIA                        |
| Tin      | PT Timah Tbk Mentok                               | INDONESIA                        |
| Tin      | PT Tinindo Inter Nusa                             | INDONESIA                        |
| Tin      | PT Tommy Utama                                    | INDONESIA                        |
| Tin      | Rui Da Hung                                       | TAIWAN, PROVINCE OF CHINA        |
| Tin      | Thaisarco   | THAILAND                         |
| Tin      | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.    | CHINA                            |
| Tin      | White Solder Metalurgia e Mineracao Ltda.         | BRAZIL                           |
| Tin      | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.     | CHINA                            |
| Tin      | Tin Smelting Branch of Yunnan Tin Co., Ltd.       | CHINA                            |
| Tin      | CV Venus Inti Perkasa                             | INDONESIA                        |
| Tin      | Magnu's Minerai's Metais e Ligas Ltda.            | BRAZIL                           |

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| Tin | PT Tirus Putra Mandiri  | INDONESIA                            |
| Tin | Melt Metais e Ligas S.A.  | BRAZIL                               |
| Tin | PT ATD Makmur Mandiri Jaya  | INDONESIA                            |
| Tin | O.M. Manufacturing Philippines, Inc.  | PHILIPPINES                          |
| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | VIETNAM                              |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company                                      | VIETNAM                              |
| Tin | Tuyen Quang Non-Ferrous Metals Joint Stock Company                                    | VIETNAM                              |
| Tin | An Vinh Joint Stock Mineral Processing Company  | VIETNAM                              |
| Tin | Super Ligas   | BRAZIL                               |
| Tin | Aurubis Beerse  | BELGIUM                              |
| Tin | Aurubis Berango   | SPAIN                                |
| Tin | PT Sukses Inti Makmur   | INDONESIA                            |
| Tin | PT Menara Cipta Mulia   | INDONESIA                            |
| Tin | Guangdong Hanhe Non-Ferrous Metal Co., Ltd.   | CHINA                                |
| Tin | Chifeng Dajingzi Tin Industry Co., Ltd.   | CHINA                                |
| Tin | PT Bangka Serumpun  | INDONESIA                            |
| Tin | Pongpipat Company Limited   | MYANMAR                              |
| Tin | Tin Technology & Refining   | UNITED STATES OF AMERICA             |
| Tin | Mining Minerals Resources SARL  | CONGO, DEMOCRATIC<br>REPUBLIC OF THE |
| Tin | PT Putera Sarana Shakti (PT PSS)  | INDONESIA                            |
| Tin | DS Myanmar  | MYANMAR                              |
| Tin | Fabrica Auricchio Industria e Comercio Ltda.  | BRAZIL                               |
| Tin | Rian Resources SDN. BHD.  | MALAYSIA                             |
| Tin | Dragon Silver Holdings Limited  | CHINA                                |
| Tin | CRM Synergies   | SPAIN                                |
| Tin | CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda          | BRAZIL                               |
| Tin | TRATHO Metal Quimica  | BRAZIL                               |
| Tin | PT Mitra Sukses Globalindo  | INDONESIA                            |
| Tin | Gejiu City Fuxiang Industry and Trade Co., Ltd.                                       | CHINA                                |
| Tin | Precious Minerals and Smelting Limited  | INDIA                                |
| Tin | Yunnan Yunfan Non-ferrous Metals Co., Ltd.  | CHINA                                |
| Tin | Luna Smelter, Ltd.  | RWANDA                               |
| Tin | PT Rajawali Rimba Perkasa   | INDONESIA                            |
| Tin | PT Masbro Alam Stania   | INDONESIA                            |
| Tin | Ma'anshan Weitai Tin Co., Ltd.  | CHINA                                |
| Tin | Dongguan CIEXPO Environmental Engineering Co., Ltd.                                   | CHINA                                |
| Tin | PT Lautan Harmonis Sejahtera  | INDONESIA                            |
| Tin | Gejiu Jinye Mineral Company   | CHINA                                |
| Tin | Guanyang Guida Nonferrous Metal Smelting Plant  | CHINA                                |
| Tin | Gejiu Fengming Metallurgy Chemical Plant  | CHINA                                |
| Tin | HuiChang Hill Tin Industry Co., Ltd.  | CHINA                                |



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| Tin      | Thai Nguyen Mining and Metallurgy Co., Ltd.   | VIET NAM                 |
| Tin      | PT Kijang Jaya Mandiri  | INDONESIA                |
| Tin      | An Thai Minerals Co., Ltd.  | VIET NAM                 |
| Tin      | PT O.M. Indonesia   | INDONESIA                |
| Tin      | PT Cipta Persada Mulia  | INDONESIA                |
| Tin      | CV Dua Sekawan  | INDONESIA                |
| Tin      | PT Inti Stania Prima  | INDONESIA                |
| Tin      | Phoenix Metal Ltd.  | RWANDA                   |
| Tin      | PT Wahana Perkit Jaya   | INDONESIA                |
| Tin      | VQB Mineral and Trading Group JSC   | VIET NAM                 |
| Tin      | Soft Metais Ltda.   | BRAZIL                   |
| Tin      | PT Timah Nusantara  | INDONESIA                |
| Tin      | PT Sumber Jaya Indah  | INDONESIA                |
| Tin      | PT Seirama Tin Investment   | INDONESIA                |
| Tin      | PT Koba Tin   | INDONESIA                |
| Tin      | PT Karimun Mining   | INDONESIA                |
| Tin      | PT Fang Di MulTindo   | INDONESIA                |
| Tin      | PT Eunindo Usaha Mandiri  | INDONESIA                |
| Tin      | PT DS Jaya Abadi  | INDONESIA                |
| Tin      | PT BilliTin Makmur Lestari  | INDONESIA                |
| Tin      | PT Bangka Timah Utama Sejahtera   | INDONESIA                |
| Tin      | PT Bangka Putra Karya   | INDONESIA                |
| Tin      | PT Bangka Kudai Tin   | INDONESIA                |
| Tin      | PT Alam Lestari Kencana   | INDONESIA                |
| Tin      | Novosibirsk Processing Plant Ltd.   | RUSSIAN FEDERATION       |
| Tin      | Linwu Xianggui Ore Smelting Co., Ltd.   | CHINA                    |
| Tin      | Huichang Jinshunda Tin Co., Ltd.  | CHINA                    |
| Tin      | Feinhutte Halsbrucke GmbH   | GERMANY                  |
| Tin      | CV United Smelting  | INDONESIA                |
| Tin      | PT Justindo   | INDONESIA                |
| Tin      | CV Gita Pesona  | INDONESIA                |
| Tin      | Cooperativa Metalurgica de Rond   | BRAZIL                   |
| Tin      | CNMC (Guangxi) PGMA Co., Ltd.   | CHINA                    |
| Tin      | Jiangxi Ketai Advanced Material Co., Ltd.   | CHINA                    |
| Tin      | Takehara PVD Materials Plant / PVD Materials Division of MITSUI MINING & SMELTING CO., LTD. | JAPAN                    |
| Tin      | yunnan xi ye gufen youxian gongsi   | CHINA                    |
| Tin      | Malaysia Smelting Corporation Berhad (Port Klang)   | MALAYSIA                 |
| Tungsten | A.L.M.T. Corp.  | JAPAN                    |
| Tungsten | Kennametal Huntsville   | UNITED STATES OF AMERICA |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd.  | CHINA                    |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd.  | CHINA                    |
| Tungsten | Global Tungsten & Powders Corp.   | UNITED STATES OF AMERICA |
| Tungsten | Hunan Jintai New Material Co., Ltd.   | CHINA                    |

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| Tungsten | Japan New Metals Co., Ltd.   | JAPAN                     |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd.                                    | CHINA                     |
| Tungsten | Kennametal Fallon  | UNITED STATES OF AMERICA  |
| Tungsten | Wolfram Bergbau und Hutten AG  | AUSTRIA                   |
| Tungsten | Xiamen Tungsten Co., Ltd.  | CHINA                     |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.                          | CHINA                     |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd.  | CHINA                     |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd.  | CHINA                     |
| Tungsten | Jiangxi Xincheng Tungsten Industry Co., Ltd.                                   | CHINA                     |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.                  | CHINA                     |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd.  | CHINA                     |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd.   | CHINA                     |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd.   | CHINA                     |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd.   | CHINA                     |
| Tungsten | Asia Tungsten Products Vietnam Ltd.  | VIETNAM                   |
| Tungsten | Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch | CHINA                     |
| Tungsten | H.C. Starck Tungsten GmbH  | GERMANY                   |
| Tungsten | Masan High-Tech Materials  | VIET NAM                  |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd.                                | CHINA                     |
| Tungsten | Niagara Refining LLC   | UNITED STATES OF AMERICA  |
| Tungsten | Ganzhou Haichuang Tungsten Co., Ltd.   | CHINA                     |
| Tungsten | Hydrometallurg, JSC  | RUSSIAN FEDERATION        |
| Tungsten | Unecha Refractory metals plant   | RUSSIAN FEDERATION        |
| Tungsten | Philippine Chuangxin Industrial Co., Inc.                                      | PHILIPPINES               |
| Tungsten | ACL Metais Eireli  | BRAZIL                    |
| Tungsten | Moliren Ltd.   | RUSSIAN FEDERATION        |
| Tungsten | HANNAE FOR T Co., Ltd.   | KOREA, REPUBLIC OF        |
| Tungsten | YUDU ANSHENG TUNGSTEN CO., LTD.  | CHINA                     |
| Tungsten | LLC Vostok   | RUSSIAN FEDERATION        |
| Tungsten | OOO  | RUSSIAN FEDERATION        |
| Tungsten | Fujian Xinlu Tungsten  | CHINA                     |
| Tungsten | Ganzhou Sunny Non-Ferrous Metals Co., Ltd.                                     | CHINA                     |
| Tungsten | Artek LLC  | RUSSIAN FEDERATION        |
| Tungsten | Cronimet Brasil Ltda   | BRAZIL                    |
| Tungsten | Albasteel Industria e Comercio de Ligas Para Fundicao Ltd.                     | BRAZIL                    |
| Tungsten | GEM Co., Ltd.  | CHINA                     |
| Tungsten | NPP Tyazhmetprom LLC   | RUSSIAN FEDERATION        |
| Tungsten | JSC "Kirovgrad Hard Alloys Plant"  | RUSSIAN FEDERATION        |
| Tungsten | Lianyou Metals Co., Ltd.   | TAIWAN, PROVINCE OF CHINA |
| Tungsten | Fujian Ganmin RareMetal Co., Ltd.  | CHINA                     |
| Tungsten | KGETS Co., Ltd.  | KOREA, REPUBLIC OF        |
| Tungsten | Hunan Litian Tungsten Industry Co., Ltd.                                       | CHINA                     |
| Tungsten | Woltech Korea Co., Ltd.  | KOREA, REPUBLIC OF        |

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| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.  | CHINA              |
| Tungsten | South-East Nonferrous Metal Company Limited of Hengyang City | CHINA              |
| Tungsten | Jiangxi Dayu Longxintai Tungsten Co., Ltd.                   | CHINA              |
| Tungsten | China Molybdenum Co., Ltd.                                   | CHINA              |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji              | CHINA              |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Yanglin           | CHINA              |
| Tungsten | Sanher Tungsten Vietnam Co., Ltd.                            | VIETNAM            |
| Tungsten | Ganzhou Yatai Tungsten Co., Ltd.                             | CHINA              |
| Tungsten | Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd.         | CHINA              |
| Tungsten | Pobedit, JSC   | RUSSIAN FEDERATION |
| Tungsten | Ganxian Shirui New Material Co., Ltd.                        | CHINA              |
| Tungsten | Dayu Jincheng Tungsten Industry Co., Ltd.                    | CHINA              |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd.                    | CHINA              |
| Tungsten | Vietnam Youngsun Tungsten Industry Co., Ltd.                 | VIETNAM            |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd.                          | VIETNAM            |
| Tungsten | Ganzhou Non-ferrous Metals Smelting Co., Ltd.                | CHINA              |
| Tungsten | Ganzhou Grand Sea W & Mo Group Co Ltd                        | CHINA              |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd.                             | CHINA              |
| Tungsten | Dayu Weiliang Tungsten Co., Ltd.                             | CHINA              |
| Tungsten | Shinwon Tungsten (Fujian Shanghang) Co., Ltd.                | CHINA              |
| Tungsten | Kenee Mining Corporation Vietnam                             | VIETNAM            |

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

**FORM SD  
SPECIALIZED DISCLOSURE REPORT**

**Nova Ltd.**

(Exact name of registrant as specified in its charter)

**Israel**  
(State or other jurisdiction of  
incorporation or organization)

**000-30668**  
(Commission file number)

**98-0601172**  
(IRS Employer Identification No.)

**5 David Fikes St., Rehovot 7632805, Israel**  
(Address of principal executive offices) (Zip code)

**Dror David, +972-73-2295670, +972-8-9407776**  
(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, 2023.

## **SECTION 1 – CONFLICT MINERALS DISCLOSURE**

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

#### **Conflict Minerals Disclosure**

In accordance with Rule 13p-1 of the Securities Exchange Act of 1934, as amended, Nova Ltd. (the “Company”) hereby files this Specialized Disclosure Report on Form SD and the Conflict Minerals Report attached hereto as Exhibit 1.01. The Specialized Disclosure Report on Form SD and Conflict Minerals Report are also available on the Company’s website at: <https://www.novami.com/investors/cg/> under “Investors” —“Corporate Governance” – “Conflict Minerals”. The content of any website referred to in this Form SD (including the exhibit hereto) is included for general information only and is not incorporated by reference into this document.

## **SECTION 2 – RESOURCE EXTRACTION ISSUER DISCLOSURE**

### **Item 2.01 Resource Extraction Issuer Disclosure and Report**

Not applicable.

## **SECTION 3 – EXHIBITS**

### **Item 3.01 Exhibits**

Exhibit 1.01 – Conflict Minerals Report for the reporting period January 1, 2023 to December 31, 2023.

## 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.

**Nova Ltd.**  
(Registrant)

By: /s/ Dror David  
Dror David  
Chief Financial Officer

May 29, 2024  
Date

**Nova Ltd.**  
**Conflict Minerals Report**  
**For the Reporting Period January 1, 2023 to December 31, 2023**

**Introduction**

This Conflict Minerals Report of Nova Ltd. (the “Company”, “our Company”, “Nova”, “we”, “us” or “our”) for the reporting period from January 1, 2023 to December 31, 2023 is presented to comply with Rule 13p-1 under the Securities Exchange Act of 1934, as amended (the “Rule”). The Rule was adopted by the Securities and Exchange Commission (the “SEC”) to implement reporting and disclosure requirements related to conflict minerals as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The Rule imposes certain reporting obligations on SEC registrants whose manufactured products contain cassiterite, columbite-tantalite (coltan), gold, wolframite and their derivatives, which are limited to tin, tantalum, tungsten and gold (“Conflict Minerals”), and which are necessary to the functionality or production of their products. The Rule requires each of these registrants to conduct a reasonable country of origin inquiry (“RCOI”) with respect to the sourcing of the Conflict Minerals that such company uses in its products and, if it has no reason to believe that the Conflict Minerals originated in the Democratic Republic of the Congo (“DRC”) or an adjoining country (the “Covered Countries”), file a description of the inquiry performed and the results of such inquiry on Form SD. If after conducting a RCOI as required by SEC rules a registrant has reason to believe that any of the Conflict Minerals in its supply chain may have originated in the DRC or Covered Countries, or if it is unable to determine the country of origin of those Conflict Minerals, then the registrant must exercise due diligence with respect to the source and chain of custody of the Conflict Minerals in order to determine whether or not such Conflict Minerals directly or indirectly financed or benefited armed groups in the DRC or Covered Countries, and describe such due diligence measures in a Conflict Minerals Report that is included as an exhibit to its Form SD.

Nova is committed to responsible sourcing of minerals and has taken action to increase transparency in its supply chain and ensure responsible procurement by its suppliers and sub-suppliers. Nova has adopted a policy with respect to the sourcing of Conflict Minerals, which is available on its website at: <https://www.novami.com/investors/cg/> under “Investors” — “Corporate Governance” – “Conflict Minerals”. The content of any website referred to in this Conflict Minerals Report is included for general information only and is not incorporated by reference into this document.

Consistent with the Rule and the SEC’s statement on April 29, 2014 relating to the Rule, this Conflict Minerals Report has not been audited by an independent private sector auditor.

**Company and Products Overview**

We are a leading innovator and a key provider of metrology solutions for advanced process control used in semiconductor manufacturing. We offer several metrology solutions, mainly by using optical and x-ray technologies, delivering unique measurement solutions to measure the most advanced semiconductor technology nodes. Our metrology systems measure various film thickness and composition properties as well as critical-dimension (CD) variables during various front-end and back-end of line steps in the semiconductor wafer fabrication process, allowing semiconductor manufacturers to improve quality, productivity and yields, lower manufacturing costs and increase profitability. We supply our metrology solutions to major semiconductor manufacturers worldwide and serve customers from offices in Taiwan, the Republic of Korea, China, Japan, the United States and Europe.

The scope of this report includes all of our consolidated businesses and subsidiaries for the year 2023, including one manufacturing facility for our Optical CD product lines, which is located in Ness-Ziona, Israel, and one manufacturing facility for our x-ray product line, which is located in Fremont, California, in the United States. This report refers to the purchase of parts and sub-assemblies (“Components”) used for our manufacturing facilities in both Israel and California. During 2023, all such Components were purchased from third parties and were delivered to these facilities, where they were integrated into complete systems that constitute the tools that we sold to others. Following the acquisition of ancosys GmbH in January 2022, and its merger into Nova Measuring Instruments GmbH in June 2023, we have expanded our technology offering by adding Chemical Analytical methods with applications of Chemical metrology in various steps..

Because metals such as tin, tantalum, tungsten and gold that are included in the definition of Conflict Minerals are generally contained in our Components, we believe that our products contain Conflict Minerals that are necessary for the functionality or production of our products.

### **Reasonable Country of Origin Inquiry (“RCOI”)**

Because we believe that Conflict Minerals were necessary to the functionality or production of products manufactured, or contracted to be manufactured, by us during 2023, we performed an RCOI to determine whether the Conflict Minerals in such products originated from the DRC or Covered Countries and whether such Conflict Minerals come from recycled or scrap sources.

The products that we manufacture, or contract to manufacture, are highly complex, and typically contain thousands of Components from many manufacturers. We have an extensive and varied supply chain and do not have a direct relationship with Conflict Minerals smelters or refiners. In this regard, we do not purchase Conflict Minerals directly from mines, smelters or refiners, and there are many third parties in the supply chain between the original sources of Conflict Minerals and the ultimate manufacture of our products. Accordingly, to gather information from our suppliers, we utilize a standard template for Conflict Minerals reporting designed by the Responsible Minerals Initiative (“RMI”) known as the Conflict Minerals Reporting Template (the “CMRT”). We relied on our suppliers to complete the CMRT in order to provide information on the origin of the Conflict Minerals contained in Components supplied to us – including information regarding the sources of Conflict Minerals that are supplied to our suppliers from lower tiers in the chain (i.e., sub-suppliers). In addition, with respect to the certification of smelters or refiners as conflict-free, we have relied upon the latest findings of the RMI’s Responsible Minerals Assurance Process (the “RMAP”).

The RCOI undertaken by us in 2023 consisted of sending letters and CMRTs to 39 of our largest first-tier suppliers that we concluded were providing us with Components that do, or may, contain Conflict Minerals that are necessary for the functionality or production of our products and that accounted for approximately 85% of all our applicable 2023 product material expenditures. These suppliers include our turnkey suppliers, which means that they are in direct contact with our supply chain management team, and are considered to be our strategic partners, having long-term relationships with our Company. The letters we sent to such suppliers explained the Rule and referred the suppliers to online training materials and instructions, sought their support and cooperation in our efforts in connection with Conflict Minerals, provided a copy of our Conflict Minerals policy, and asked them to complete the CMRT. Working with a third-party service provider to conduct the survey and compile the survey results, we reviewed the responses and followed up as necessary by sending periodic reminders to non-responsive suppliers and following up on responses that appeared to be inconsistent, incomplete or inaccurate. In the end, the response rate from suppliers asked to participate was 89%.

Based on information obtained in the RCOI, and taking into account the complexities of our supply chain, we concluded that we did not have sufficient information to determine the country of origin of the Conflict Minerals in our products and were unable to rule out the possibility that Conflict Minerals used in our products originated, or may have originated, from the DRC or Covered Countries. Therefore, in accordance with the Rule, we undertook due diligence on the source and chain of custody of the Conflict Minerals that were necessary to the functionality or production of our products during 2023. There is significant overlap between our RCOI efforts and our due diligence measures performed.

### **Due Diligence**

#### **Design of Due Diligence Framework**

Our due diligence measures have been designed, in all material respects, to conform as far as practicable with the internationally recognized due diligence framework prescribed by the Organization for Economic Co-operation and Development (“OECD”), known as “Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas” and related supplements for Conflict Minerals (the “OECD Guidance”).



## Due Diligence Measures Performed

In substantial conformance with the OECD Guidance, our due diligence efforts for calendar year 2023 included the following steps:

### *Step 1. Establish Strong Company Management Systems*

- Conflict Minerals steering committee: A cross-functional Conflict Minerals steering committee operates our Conflict Minerals program. The committee consists of representatives from the following areas: operations (purchasing and engineering); and legal and compliance. Regular meetings of our Conflict Minerals steering committee were held, and the committee periodically updated representatives of our senior management on the status of the Conflict Minerals program.
- Conflict Minerals Policy: Our Conflict Minerals policy (the “Policy”), adopted in 2015, has been communicated both throughout our Company and to suppliers, and is publicly available on our Company’s website at : <https://www.novami.com/investors/cg/> under “Investors” —“Corporate Governance” – “Conflict Minerals”.
- Supplier engagement: We sent letters and CMRTs to a substantial portion of our first-tier suppliers identified during an applicability assessment phase as providing Components that do, or may, contain Conflict Minerals that are necessary for the functionality or production of our products. The aforementioned letters advised the suppliers of our commitment to responsible sourcing of minerals and indicated that their cooperation in the due diligence efforts is expected, including by completion of the CMRT.

In addition, we made training materials available to those first-tier suppliers that included an overview of the Rule and instructions on how to complete the CMRT survey.

For each purchase order issued by our computerized purchase order system for purchasing Components, suppliers are required to accept our terms and conditions, which include, among others, that (i) upon request, a supplier shall provide us with information regarding its products that contain Conflict Minerals, and (ii) in certain cases, we reserve the right to immediately terminate the purchase order and cease all procurement activity with the supplier.

### *Step 2. Identify and Assess Risks in the Supply Chain*

We identified and assessed risk in our supply chain as follows: First, we identified our major first-tier (i.e., direct) suppliers that provide Components that potentially incorporate Conflict Minerals that are necessary to the functionality or production of our products that we manufactured, or contracted to manufacture, in 2023 (and which accounted for a substantial portion of all applicable expenditures on Components by our Company in 2023). We then requested information from relevant suppliers regarding the source and chain of custody of Conflict Minerals in their supply chain. To facilitate the collection of complete, accurate, standardized and verifiable information, we relied primarily on the CMRT, which seeks information regarding country of origin of Conflict Minerals, mine location and smelters or refiners used.

We reviewed suppliers’ responses in order to track information regarding smelters or refiners of Conflict Minerals in our supply chain that have not received a conflict-free designation based on the RMAP.

### *Step 3. Design and Implement a Strategy to Respond to Identified Risks*

We initiated a supply chain survey with selected suppliers using the CMRT in order to identify those smelters or refiners that supplied Conflict Minerals used in our products. We monitored and tracked our performance in this area by reviewing supplier responses. Each CMRT completed by a supplier was entered into a database maintained by a third-party service provider and reviewed. For suppliers that provided unclear or incomplete responses, an escalation process was used in order to obtain complete and accurate required information, sometimes requiring multiple telephone and/or email contacts to further the data collection process. Our Conflict Minerals steering committee held regular meetings to review progress and assess the risks identified.

In addition, smelters or refiners that were identified in the suppliers’ responses were compared against the list of facilities that have received a conflict-free designation from the RMAP (“conflict-free” meaning generally that they did not directly or indirectly finance or benefit armed groups in the Covered Countries), and country of origin information for the smelters or refiners identified by the supply chain responses were reviewed using RMAP data. In accordance with our risk management plan, we contacted suppliers that have been identified as having non-certified smelters or refiners within the smelters or refiners list that they have provided to us.

Finally, representatives of our senior management were briefed about our due diligence efforts and findings on a regular basis.

#### *Step 4. Carry Out Independent Third-Party Audit of Smelter/Refiner's Due Diligence Practices*

We are several steps away in the supply chain from smelters or refiners that process the Conflict Minerals used in our products, do not have any direct relationships with such smelters or refiners and did not obtain from a third party or perform ourselves a direct audit of smelters or refiners within our supply chain. Instead, we relied on conflict-free designations based on the activities of other organizations such as the RMI (through the RMAP).

#### *Step 5. Report Annually on Supply Chain Due Diligence*

We report annually on our supply chain due diligence, as required by the Rule, and have posted our Form SD and Conflict Minerals Report on our website at : <https://www.novami.com/investors/cg/> under “Investors” —“Corporate Governance” – “Conflict Minerals”.

### **Results of Assessment**

On account of incomplete information, we are unable at this time to determine and describe with complete certainty in this report a complete list of either the facilities used to process the Conflict Minerals used in our products or the countries of origin of those Conflict Minerals. We have, nevertheless, described below the results of our assessment on the source of the Conflict Minerals, to the extent that we received information from our relevant suppliers through our due diligence efforts.

As indicated above, the products that we manufacture, or contract to manufacture, are highly complex, and typically contain thousands of Components from many suppliers. Because there are generally multiple tiers between the mines that extract Conflict Minerals and our suppliers, we relied on our suppliers to provide information on the origin of the Conflict Minerals contained in Components supplied to us.

In all, we surveyed 39 suppliers to whom we paid approximately 85% of the applicable expenditures by our Company on Component costs for our products in 2023. 89% of the suppliers whom we surveyed provided a complete response.

As part of our due diligence efforts and based on the information received from our suppliers, we identified 349 smelters or refiners of Conflict Minerals used generally in their supply chains, of which 64% have been certified as conflict free by the RMI's RMAP, and of which 1.15% are currently engaged in the RMI audit process. A list of these identified smelters or refiners is provided in [Appendix A](#) hereto.

Some suppliers were unable to provide a complete list of smelters or refiners. In addition, despite receiving information regarding smelters or refiners used generally by some suppliers in their supply chains, these suppliers were unable to report which smelters or refiners were part of the supply chain applicable to the specific Components that were sold to us. Furthermore, for the significant majority of smelters reported by these suppliers, there is inadequate information available to assess the source of the conflict minerals that they process. As a result, we are unable to identify with complete accuracy the country of origin of the Conflict Minerals used in our products in 2023 and we concluded in good faith that we lack sufficient information to trace the chain of custody of any Conflict Minerals contained in our products in 2023 up through the supply chain to a specific smelter or, in turn, to a country or mine of origin. We have, however, become aware that certain smelters or refiners from Covered Countries that have been identified as part of the supply chain of our suppliers have not been certified as conflict free under the RMI's RMAP. We have therefore activated our risk management procedures in respect of those smelters or refiners, and have approached the supplier that provided us the relevant Conflict Minerals sourced from those smelters or refiners and have asked for corrective action to be taken.

We furthermore note that information is not gathered from our suppliers on a continuous, real-time basis. We can therefore only provide reasonable, not absolute, assurance regarding the source and chain of custody of the Conflict Minerals used in our products, since the information comes from direct suppliers, not the underlying smelters or refiners, and is based on independent third-party audit programs, not our own auditing.

## **Continuous Efforts to Mitigate Risk**

We intend to maintain our approach for responsible sourcing of the minerals used in our products and to continue to comply with any applicable regulations related to the sourcing of, and disclosure concerning, the Conflict Minerals that may be contained in our products.

## **Forward Looking Statements**

Forward-looking statements in this Conflict Minerals Report are made pursuant to the safe harbor provisions of Section 21E of the Securities Exchange Act of 1934, as amended, and other federal securities laws. Investors are cautioned that statements in this Conflict Minerals Report that are not strictly historical statements, including without limitation, the Company's intentions and expectations regarding further supplier engagement, due diligence and risk mitigation efforts and strategy, constitute forward looking statements that involve risks and uncertainties. Actual results could differ materially from the forward-looking statements. Words such as "expects," "anticipates," "intends," variations of these words, and similar expressions, are intended to identify such forward looking statements. Risks and uncertainties that could cause actual results to differ include, without limitation, risks and uncertainties associated with the progress of industry and other supply chain transparency and smelter or refiner validation programs for Conflict Minerals (including the possibility of inaccurate information, fraud and other irregularities), inadequate supplier education and knowledge, limitations on the ability or willingness of suppliers to provide more accurate, complete and detailed information and limitations on the Company's ability to verify the accuracy or completeness of any supply chain information provided by suppliers or others. Except as otherwise required by law, the Company undertakes no obligation to update publicly the information contained in this Conflict Minerals Report, or any forward-looking statements, to reflect new information, events or circumstances after the date they were made, or to reflect the occurrence of unanticipated events.

## Appendix A

### List of Identified Smelters or Refiners

| <b>Smelter Metal</b> | <b>Smelter Look-up (known smelters by RMI)</b>                  | <b>Smelter Country</b>   |
|----------------------|---|--------------------------|
| Gold                 | Advanced Chemical Company                                       | UNITED STATES OF AMERICA |
| Gold                 | Aida Chemical Industries Co., Ltd.                              | JAPAN                    |
| Gold                 | Agosi AG  | GERMANY                  |
| Gold                 | Almalyk Mining and Metallurgical Complex (AMMC)                 | UZBEKISTAN               |
| Gold                 | AngloGold Ashanti Corrego do Sitio Mineracao                    | BRAZIL                   |
| Gold                 | Argor-Heraeus S.A.  | SWITZERLAND              |
| Gold                 | Asahi Pretec Corp.  | JAPAN                    |
| Gold                 | Asaka Riken Co., Ltd.   | JAPAN                    |
| Gold                 | Atasay Kuyumculuk Sanayi Ve Ticaret A.S.                        | TURKEY                   |
| Gold                 | Aurubis AG  | GERMANY                  |
| Gold                 | Bangko Sentral ng Pilipinas (Central Bank of the Philippines)   | PHILIPPINES              |
| Gold                 | Boliden AB  | SWEDEN                   |
| Gold                 | C. Hafner GmbH + Co. KG   | GERMANY                  |
| Gold                 | Caridad   | MEXICO                   |
| Gold                 | CCR Refinery - Glencore Canada Corporation                      | CANADA                   |
| Gold                 | Cendres + Metaux S.A.   | SWITZERLAND              |
| Gold                 | Yunnan Copper Industry Co., Ltd.                                | CHINA                    |
| Gold                 | Chimet S.p.A.   | ITALY                    |
| Gold                 | Chugai Mining   | JAPAN                    |
| Gold                 | Daye Non-Ferrous Metals Mining Ltd.                             | CHINA                    |
| Gold                 | DSC (Do Sung Corporation)                                       | KOREA, REPUBLIC OF       |
| Gold                 | Dowa  | JAPAN                    |
| Gold                 | Eco-System Recycling Co., Ltd. East Plant                       | JAPAN                    |
| Gold                 | JSC Novosibirsk Refinery  | RUSSIAN FEDERATION       |
| Gold                 | Refinery of Seemine Gold Co., Ltd.                              | CHINA                    |
| Gold                 | Guoda Safina High-Tech Environmental Refinery Co., Ltd.         | CHINA                    |
| Gold                 | Hangzhou Fuchunjiang Smelting Co., Ltd.                         | CHINA                    |
| Gold                 | LT Metal Ltd.   | KOREA, REPUBLIC OF       |
| Gold                 | Heimerle + Meule GmbH   | GERMANY                  |
| Gold                 | Heraeus Metals Hong Kong Ltd.                                   | CHINA                    |
| Gold                 | Heraeus Germany GmbH Co. KG                                     | GERMANY                  |
| Gold                 | Hunan Chenzhou Mining Co., Ltd.                                 | CHINA                    |
| Gold                 | Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd.             | CHINA                    |
| Gold                 | HwaSeong 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 | Asahi Refining USA Inc.   | UNITED STATES OF AMERICA |
| Gold | Asahi Refining Canada Ltd.  | CANADA                   |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant                         | RUSSIAN FEDERATION       |
| Gold | JSC Uralelectromed  | RUSSIAN FEDERATION       |
| Gold | JX Nippon Mining & Metals Co., Ltd.   | JAPAN                    |
| Gold | Kazakhmys Smelting LLC  | KAZAKHSTAN               |
| Gold | Kazzinc   | KAZAKHSTAN               |
| Gold | Kennecott Utah Copper LLC   | UNITED STATES OF AMERICA |
| Gold | Kojima Chemicals Co., Ltd.  | JAPAN                    |
| Gold | Kyrgyzaltyn JSC   | KYRGYZSTAN               |
| Gold | L'azurde Company For Jewelry  | SAUDI ARABIA             |
| Gold | Lingbao Gold Co., Ltd.  | CHINA                    |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd.                                  | CHINA                    |
| Gold | LS-NIKKO Copper Inc.  | KOREA, REPUBLIC OF       |
| Gold | Luoyang Zijin Yinhui Gold Refinery Co., Ltd.                                | CHINA                    |
| Gold | Materion  | UNITED STATES OF AMERICA |
| Gold | Matsuda Sangyo Co., Ltd.  | JAPAN                    |
| Gold | Metalor Technologies (Suzhou) Ltd.  | CHINA                    |
| Gold | Metalor Technologies (Hong Kong) Ltd.                                       | CHINA                    |
| Gold | Metalor Technologies (Singapore) Pte., Ltd.                                 | SINGAPORE                |
| Gold | Metalor Technologies S.A.   | SWITZERLAND              |
| Gold | Metalor USA Refining Corporation  | UNITED STATES OF AMERICA |
| Gold | Metalurgica Met-Mex Penoles S.A. De C.V.                                    | MEXICO                   |
| Gold | Mitsubishi Materials Corporation  | JAPAN                    |
| Gold | Mitsui Mining and Smelting Co., Ltd.  | JAPAN                    |
| Gold | Moscow Special Alloys Processing Plant                                      | RUSSIAN FEDERATION       |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.S.                                      | TURKEY                   |
| Gold | Navoi Mining and Metallurgical Combinat                                     | UZBEKISTAN               |
| Gold | Nihon Material Co., Ltd.  | JAPAN                    |
| Gold | Ohura Precious Metal Industry Co., Ltd.                                     | JAPAN                    |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | RUSSIAN FEDERATION       |
| Gold | MKS PAMP SA   | SWITZERLAND              |
| Gold | Penglai Penggang Gold Industry Co., Ltd.                                    | CHINA                    |
| Gold | Prioksky Plant of Non-Ferrous Metals  | RUSSIAN FEDERATION       |
| Gold | PT Aneka Tambang (Persero) Tbk  | INDONESIA                |
| Gold | PX Precinox S.A.  | SWITZERLAND              |
| Gold | Rand Refinery (Pty) Ltd.  | SOUTH AFRICA             |
| Gold | Royal Canadian Mint   | CANADA                   |
| Gold | Sabin Metal Corp.   | UNITED STATES OF AMERICA |
| Gold | Samduck Precious Metals   | KOREA, REPUBLIC OF       |
| Gold | Samwon Metals Corp.   | KOREA, REPUBLIC OF       |
| Gold | SEMPSA Joyeria Plateria S.A.  | SPAIN                    |

|      |   |                           |
|------|---|---------------------------|
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | CHINA                     |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.       | CHINA                     |
| Gold | Sichuan Tianze Precious Metals Co., Ltd.                | CHINA                     |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals    | RUSSIAN FEDERATION        |
| Gold | Solar Applied Materials Technology Corp.                | TAIWAN, PROVINCE OF CHINA |
| Gold | Sumitomo Metal Mining Co., Ltd.                         | JAPAN                     |
| Gold | Super Dragon Technology Co., Ltd.                       | TAIWAN, PROVINCE OF CHINA |
| Gold | Tanaka Kikinzoku Kogyo K.K.                             | JAPAN                     |
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM            | CHINA                     |
| Gold | Shandong Gold Smelting Co., Ltd.                        | CHINA                     |
| Gold | Tokuriki Honten Co., Ltd.                               | JAPAN                     |
| Gold | Tongling Nonferrous Metals Group Co., Ltd.              | CHINA                     |
| Gold | Torecom   | KOREA, REPUBLIC OF        |
| Gold | Umicore S.A. Business Unit Precious Metals Refining     | BELGIUM                   |
| Gold | United Precious Metal Refining, Inc.                    | UNITED STATES OF AMERICA  |
| Gold | Valcambi S.A.   | SWITZERLAND               |
| Gold | Western Australian Mint (T/a The Perth Mint)            | AUSTRALIA                 |
| Gold | Yamakin Co., Ltd.                                       | JAPAN                     |
| Gold | Yokohama Metal Co., Ltd.                                | JAPAN                     |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation     | CHINA                     |
| Gold | Gold Refinery of Zijin Mining Group Co., Ltd.           | CHINA                     |
| Gold | Morris and Watson                                       | NEW ZEALAND               |
| Gold | SAFINA A.S.   | CZECHIA                   |
| Gold | Guangdong Jinding Gold Limited                          | CHINA                     |
| Gold | Umicore Precious Metals Thailand                        | THAILAND                  |
| Gold | Geib Refining Corporation                               | UNITED STATES OF AMERICA  |
| Gold | MMTC-PAMP India Pvt., Ltd.                              | INDIA                     |
| Gold | KGHM Polska Miedz Spolka Akcyjna                        | POLAND                    |
| Gold | Fidelity Printers and Refiners Ltd.                     | ZIMBABWE                  |
| Gold | Singway Technology Co., Ltd.                            | TAIWAN, PROVINCE OF CHINA |
| Gold | Shandong Humon Smelting Co., Ltd.                       | CHINA                     |
| Gold | Shenzhen Zhonghenglong Real Industry Co., Ltd.          | CHINA                     |
| Gold | Al Etihad Gold Refinery DMCC                            | UNITED ARAB EMIRATES      |
| Gold | Emirates Gold DMCC                                      | UNITED ARAB EMIRATES      |
| Gold | International Precious Metal Refiners                   | UNITED ARAB EMIRATES      |
| Gold | Kaloti Precious Metals                                  | UNITED ARAB EMIRATES      |
| Gold | Sudan Gold Refinery                                     | SUDAN                     |
| Gold | T.C.A S.p.A   | ITALY                     |
| Gold | REMONDIS PMR B.V.                                       | NETHERLANDS               |
| Gold | Fujairah Gold FZC                                       | UNITED ARAB EMIRATES      |
| Gold | Industrial Refining Company                             | BELGIUM                   |
| Gold | Korea Zinc Co., Ltd.                                    | KOREA, REPUBLIC OF        |
| Gold | Marsam Metals   | BRAZIL                    |
| Gold | TOO Tau-Ken-Altyn                                       | KAZAKHSTAN                |

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| Gold | Abington Reldan Metals, LLC  | UNITED STATES OF AMERICA |
| Gold | SAAMP  | FRANCE                   |
| Gold | L'Orfebre S.A.   | ANDORRA                  |
| Gold | 8853 S.p.A.  | ITALY                    |
| Gold | Italpreziosi   | ITALY                    |
| Gold | WIELAND Edelmetalle GmbH   | GERMANY                  |
| Gold | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH          | AUSTRIA                  |
| Gold | AU Traders and Refiners  | SOUTH AFRICA             |
| Gold | GGC Gujrat Gold Centre Pvt. Ltd.                                     | INDIA                    |
| Gold | Sai Refinery   | INDIA                    |
| Gold | Modeltech Sdn Bhd  | MALAYSIA                 |
| Gold | Bangalore Refinery   | INDIA                    |
| Gold | Kyshtym Copper-Electrolytic Plant ZAO                                | RUSSIAN FEDERATION       |
| Gold | Degussa Sonne / Mond Goldhandel GmbH                                 | GERMANY                  |
| Gold | Pease & Curren   | UNITED STATES OF AMERICA |
| Gold | SungEel HiMetal Co., Ltd.  | KOREA, REPUBLIC OF       |
| Gold | Planta Recuperadora de Metales SpA                                   | CHILE                    |
| Gold | Safimet S.p.A  | ITALY                    |
| Gold | State Research Institute Center for Physical Sciences and Technology | LITHUANIA                |
| Gold | African Gold Refinery  | UGANDA                   |
| Gold | NH Recytech Company  | KOREA, REPUBLIC OF       |
| Gold | QG Refining, LLC   | UNITED STATES OF AMERICA |
| Gold | Dijllah Gold Refinery FZC  | UNITED ARAB EMIRATES     |
| Gold | Coimpa Industrial LTDA   | BRAZIL                   |
| Gold | Dongwu Gold Group  | CHINA                    |
| Gold | Gold by Gold Colombia  | COLOMBIA                 |
| Gold | Value Trading  | BELGIUM                  |
| Gold | WEEEREFINING   | FRANCE                   |
| Gold | Metal Concentrators SA (Pty) Ltd.                                    | SOUTH AFRICA             |
| Gold | Metallix Refining Inc.   | UNITED STATES OF AMERICA |
| Gold | MD Overseas  | INDIA                    |
| Gold | Sellem Industries Ltd.   | MAURITANIA               |
| Gold | Sancus ZFS (L  | COLOMBIA                 |
| Gold | Alexy Metals   | UNITED STATES OF AMERICA |
| Gold | K.A. Rasmussen   | NORWAY                   |
| Gold | Emerald Jewel Industry India Limited (Unit 4)                        | INDIA                    |
| Gold | Emerald Jewel Industry India Limited (Unit 3)                        | INDIA                    |
| Gold | Emerald Jewel Industry India Limited (Unit 2)                        | INDIA                    |
| Gold | Emerald Jewel Industry India Limited (Unit 1)                        | INDIA                    |
| Gold | Kundan Care Products Ltd.  | INDIA                    |
| Gold | Augmont Enterprises Private Limited                                  | INDIA                    |
| Gold | Eco-System Recycling Co., Ltd. West Plant                            | JAPAN                    |
| Gold | Eco-System Recycling Co., Ltd. North Plant                           | JAPAN                    |

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| Gold     | C.I Metales Procesados Industriales SAS       | COLOMBIA                     |
| Gold     | Sovereign Metals                              | INDIA                        |
| Gold     | CGR Metalloys Pvt Ltd.                        | INDIA                        |
| Gold     | DS PRETECH Co., Ltd.                          | KOREA, REPUBLIC OF           |
| Gold     | Gold Coast Refinery                           | GHANA                        |
| Gold     | ABC Refinery Pty Ltd.                         | AUSTRALIA                    |
| Gold     | JALAN & Company                               | INDIA                        |
| Gold     | Morris and Watson Gold Coast                  | AUSTRALIA                    |
| Gold     | Universal Precious Metals Refining Zambia     | ZAMBIA                       |
| Gold     | Metahub Industries Sdn. Bhd.                  | MALAYSIA                     |
| Gold     | SAXONIA Edelmetalle GmbH                      | GERMANY                      |
| Gold     | Albino Mountinho Lda.                         | PORTUGAL                     |
| Gold     | Shenzhen CuiLu Gold Co., Ltd.                 | CHINA                        |
| Gold     | Shirpur Gold Refinery Ltd.                    | INDIA                        |
| Gold     | Republic Metals Corporation                   | UNITED STATES OF AMERICA     |
| Gold     | Faggi Enrico S.p.A.                           | ITALY                        |
| Gold     | Umicore Brasil Ltda.                          | BRAZIL                       |
| Gold     | So Accurate Group, Inc.                       | UNITED STATES OF AMERICA     |
| Gold     | Schone Edelmetaal B.V.                        | NETHERLANDS                  |
| Gold     | OJSC Kolyma Refinery                          | RUSSIAN FEDERATION           |
| Gold     | Elemental Refining, LLC                       | UNITED STATES OF AMERICA     |
| Gold     | Korea Metal Co., Ltd.                         | KOREA, REPUBLIC OF           |
| Gold     | DODUCO Contacts and Refining GmbH             | GERMANY                      |
| Gold     | Daejin Indus Co., Ltd.                        | KOREA, REPUBLIC OF           |
| Gold     | Bauer Walser AG                               | GERMANY                      |
| Gold     | Allgemeine Gold-und Silberscheideanstalt A.G. | GERMANY                      |
| Gold     | Aktyubinsk Copper Company TOO                 | KAZAKHSTAN                   |
| Gold     | KP Sanghvi International Airport              | INDIA                        |
| Gold     | GG Refinery Ltd.                              | TANZANIA, UNITED REPUBLIC OF |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd.     | CHINA                        |
| Tantalum | F&X Electro-Materials Ltd.                    | CHINA                        |
| Tantalum | XIMEI RESOURCES (GUANGDONG) LIMITED           | CHINA                        |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd.   | CHINA                        |
| Tantalum | Jiujiang Tanbre Co., Ltd.                     | CHINA                        |
| Tantalum | AMG Brasil                                    | BRAZIL                       |
| Tantalum | Metallurgical Products India Pvt., Ltd.       | INDIA                        |
| Tantalum | Mineracao Taboca S.A.                         | BRAZIL                       |
| Tantalum | NPM Silmet AS                                 | ESTONIA                      |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd.    | CHINA                        |
| Tantalum | QuantumClean                                  | UNITED STATES OF AMERICA     |
| Tantalum | Yanling Jincheng Tantalum & Niobium Co., Ltd. | CHINA                        |
| Tantalum | Solikamsk Magnesium Works OAO                 | RUSSIAN FEDERATION           |
| Tantalum | Taki Chemical Co., Ltd.                       | JAPAN                        |



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| Tantalum | Telex Metals   | UNITED STATES OF AMERICA                        |
| Tantalum | Ulba Metallurgical Plant JSC                         | KAZAKHSTAN                                      |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd.    | CHINA   |
| Tantalum | D Block Metals, LLC                                  | UNITED STATES OF AMERICA                        |
| Tantalum | FIR Metals & Resource Ltd.                           | CHINA   |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd.        | CHINA   |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd.        | CHINA   |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd.         | CHINA   |
| Tantalum | KEMET de Mexico                                      | MEXICO  |
| Tantalum | TANIOBIS Co., Ltd.                                   | THAILAND  |
| Tantalum | TANIOBIS GmbH  | GERMANY   |
| Tantalum | Materion Newton Inc.                                 | UNITED STATES OF AMERICA                        |
| Tantalum | TANIOBIS Japan Co., Ltd.                             | JAPAN   |
| Tantalum | TANIOBIS Smelting GmbH & Co. KG                      | GERMANY   |
| Tantalum | Global Advanced Metals Boyertown                     | UNITED STATES OF AMERICA                        |
| Tantalum | Global Advanced Metals Aizu                          | JAPAN   |
| Tantalum | Resind Industria e Comercio Ltda.                    | BRAZIL  |
| Tantalum | Jiangxi Tuohong New Raw Material                     | CHINA   |
| Tantalum | PowerX Ltd.  | RWANDA  |
| Tantalum | XIMEI RESOURCES(GUIZHOU) TECHNOLOGY CO., LTD.        | CHINA   |
| Tantalum | 5D Production OU                                     | ESTONIA   |
| Tantalum | Yancheng Jinye New Material Technology Co., Ltd.     | CHINA   |
| Tantalum | V&D New Materials (Jiangsu) Co., Ltd.                | CHINA   |
| Tantalum | CP Metals Inc.                                       | UNITED STATES OF AMERICA                        |
| Tantalum | Jiujiang Janny New Material Co., Ltd.                | CHINA   |
| Tantalum | RFH Metals & Chemicals Co., Ltd.                     | CHINA   |
| Tantalum | Power Resources Ltd.                                 | MACEDONIA, THE FORMER<br>YUGOSLAV REPUBLIC OF   |
| Tantalum | Avon Specialty Metals Ltd                            | UNITED KINGDOM OF GREAT<br>BRITAIN AND NORTHERN |
| Tantalum | E.S.R. Electronics                                   | UNITED STATES OF AMERICA                        |
| Tantalum | Tranzact, Inc.                                       | UNITED STATES OF AMERICA                        |
| Tantalum | KEMET Blue Powder                                    | UNITED STATES OF AMERICA                        |
| Tantalum | Taike Technology(Suzhou)Co.,Ltd.                     | CHINA   |
| Tantalum | Plansee SE Reutte                                    | AUSTRIA   |
| Tantalum | H.C. Starck Hermsdorf GmbH                           | GERMANY   |
| Tantalum | H.C. Starck GmbH Laufenburg                          | GERMANY   |
| Tantalum | Plansee SE Liezen                                    | AUSTRIA   |
| Tantalum | Guizhou Zhenhua Xinyun Technology Ltd., Kaili branch | CHINA   |
| Tantalum | Yichun Jin Yang Rare Metal Co., Ltd.                 | CHINA   |
| Tantalum | Zhuzhou Cemented Carbide Group Co., Ltd.             | CHINA   |
| Tantalum | King-Tan Tantalum Industry Ltd.                      | CHINA   |
| Tantalum | Hi-Temp Specialty Metals, Inc.                       | UNITED STATES OF AMERICA                        |
| Tantalum | Exotech Inc.   | UNITED STATES OF AMERICA                        |

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| Tantalum | Duoluoshan  | CHINA                            |
| Tantalum | Guangdong Rising Rare Metals-EO Materials Ltd.    | CHINA                            |
| Tantalum | H.C. Starck GmbH                                  | GERMANY                          |
| Tin      | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | CHINA                            |
| Tin      | Alpha   | UNITED STATES OF AMERICA         |
| Tin      | PT Aries Kencana Sejahtera                        | INDONESIA                        |
| Tin      | EM Vinto  | BOLIVIA (PLURINATIONAL STATE OF) |
| Tin      | Estanho de Rondonia S.A.                          | BRAZIL                           |
| Tin      | Fenix Metals                                      | POLAND                           |
| Tin      | Gejiu Non-Ferrous Metal Processing Co., Ltd.      | CHINA                            |
| Tin      | Gejiu Zili Mining And Metallurgy Co., Ltd.        | CHINA                            |
| Tin      | Gejiu Kai Meng Industry and Trade LLC             | CHINA                            |
| Tin      | China Tin Group Co., Ltd.                         | CHINA                            |
| Tin      | Malaysia Smelting Corporation (MSC)               | MALAYSIA                         |
| Tin      | Metallic Resources, Inc.                          | UNITED STATES OF AMERICA         |
| Tin      | Minsur  | PERU                             |
| Tin      | Jiangxi New Nanshan Technology Ltd.               | CHINA                            |
| Tin      | O.M. Manufacturing (Thailand) Co., Ltd.           | THAILAND                         |
| Tin      | Operaciones Metalurgicas S.A.                     | BOLIVIA (PLURINATIONAL STATE OF) |
| Tin      | PT Artha Cipta Langgeng                           | INDONESIA                        |
| Tin      | PT Babel Inti Perkasa                             | INDONESIA                        |
| Tin      | PT Babel Surya Alam Lestari                       | INDONESIA                        |
| Tin      | PT Belitung Industri Sejahtera                    | INDONESIA                        |
| Tin      | PT Bukit Timah                                    | INDONESIA                        |
| Tin      | PT Mitra Stania Prima                             | INDONESIA                        |
| Tin      | PT Panca Mega Persada                             | INDONESIA                        |
| Tin      | PT Prima Timah Utama                              | INDONESIA                        |
| Tin      | PT Refined Bangka Tin                             | INDONESIA                        |
| Tin      | PT Sariwiguna Binasentosa                         | INDONESIA                        |
| Tin      | PT Stanindo Inti Perkasa                          | INDONESIA                        |
| Tin      | PT Timah Tbk Kundur                               | INDONESIA                        |
| Tin      | PT Timah Tbk Mentok                               | INDONESIA                        |
| Tin      | PT Tinindo Inter Nusa                             | INDONESIA                        |
| Tin      | PT Tommy Utama                                    | INDONESIA                        |
| Tin      | Rui Da Hung                                       | TAIWAN, PROVINCE OF CHINA        |
| Tin      | Thaisarco   | THAILAND                         |
| Tin      | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.    | CHINA                            |
| Tin      | White Solder Metalurgia e Mineracao Ltda.         | BRAZIL                           |
| Tin      | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.     | CHINA                            |
| Tin      | Tin Smelting Branch of Yunnan Tin Co., Ltd.       | CHINA                            |
| Tin      | CV Venus Inti Perkasa                             | INDONESIA                        |
| Tin      | Magnu's Minerai's Metais e Ligas Ltda.            | BRAZIL                           |

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| Tin | PT Tirus Putra Mandiri  | INDONESIA                            |
| Tin | Melt Metais e Ligas S.A.  | BRAZIL                               |
| Tin | PT ATD Makmur Mandiri Jaya  | INDONESIA                            |
| Tin | O.M. Manufacturing Philippines, Inc.  | PHILIPPINES                          |
| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | VIETNAM                              |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company                                      | VIETNAM                              |
| Tin | Tuyen Quang Non-Ferrous Metals Joint Stock Company                                    | VIETNAM                              |
| Tin | An Vinh Joint Stock Mineral Processing Company  | VIETNAM                              |
| Tin | Super Ligas   | BRAZIL                               |
| Tin | Aurubis Beerse  | BELGIUM                              |
| Tin | Aurubis Berango   | SPAIN                                |
| Tin | PT Sukses Inti Makmur   | INDONESIA                            |
| Tin | PT Menara Cipta Mulia   | INDONESIA                            |
| Tin | Guangdong Hanhe Non-Ferrous Metal Co., Ltd.   | CHINA                                |
| Tin | Chifeng Dajingzi Tin Industry Co., Ltd.   | CHINA                                |
| Tin | PT Bangka Serumpun  | INDONESIA                            |
| Tin | Pongpipat Company Limited   | MYANMAR                              |
| Tin | Tin Technology & Refining   | UNITED STATES OF AMERICA             |
| Tin | Mining Minerals Resources SARL  | CONGO, DEMOCRATIC<br>REPUBLIC OF THE |
| Tin | PT Putera Sarana Shakti (PT PSS)  | INDONESIA                            |
| Tin | DS Myanmar  | MYANMAR                              |
| Tin | Fabrica Auricchio Industria e Comercio Ltda.  | BRAZIL                               |
| Tin | Rian Resources SDN. BHD.  | MALAYSIA                             |
| Tin | Dragon Silver Holdings Limited  | CHINA                                |
| Tin | CRM Synergies   | SPAIN                                |
| Tin | CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda          | BRAZIL                               |
| Tin | TRATHO Metal Quimica  | BRAZIL                               |
| Tin | PT Mitra Sukses Globalindo  | INDONESIA                            |
| Tin | Gejiu City Fuxiang Industry and Trade Co., Ltd.                                       | CHINA                                |
| Tin | Precious Minerals and Smelting Limited  | INDIA                                |
| Tin | Yunnan Yunfan Non-ferrous Metals Co., Ltd.  | CHINA                                |
| Tin | Luna Smelter, Ltd.  | RWANDA                               |
| Tin | PT Rajawali Rimba Perkasa   | INDONESIA                            |
| Tin | PT Masbro Alam Stania   | INDONESIA                            |
| Tin | Ma'anshan Weitai Tin Co., Ltd.  | CHINA                                |
| Tin | Dongguan CIEXPO Environmental Engineering Co., Ltd.                                   | CHINA                                |
| Tin | PT Lautan Harmonis Sejahtera  | INDONESIA                            |
| Tin | Gejiu Jinye Mineral Company   | CHINA                                |
| Tin | Guanyang Guida Nonferrous Metal Smelting Plant  | CHINA                                |
| Tin | Gejiu Fengming Metallurgy Chemical Plant  | CHINA                                |
| Tin | HuiChang Hill Tin Industry Co., Ltd.  | CHINA                                |

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| Tin      | Thai Nguyen Mining and Metallurgy Co., Ltd.   | VIET NAM                 |
| Tin      | PT Kijang Jaya Mandiri  | INDONESIA                |
| Tin      | An Thai Minerals Co., Ltd.  | VIET NAM                 |
| Tin      | PT O.M. Indonesia   | INDONESIA                |
| Tin      | PT Cipta Persada Mulia  | INDONESIA                |
| Tin      | CV Dua Sekawan  | INDONESIA                |
| Tin      | PT Inti Stania Prima  | INDONESIA                |
| Tin      | Phoenix Metal Ltd.  | RWANDA                   |
| Tin      | PT Wahana Perkit Jaya   | INDONESIA                |
| Tin      | VQB Mineral and Trading Group JSC   | VIET NAM                 |
| Tin      | Soft Metais Ltda.   | BRAZIL                   |
| Tin      | PT Timah Nusantara  | INDONESIA                |
| Tin      | PT Sumber Jaya Indah  | INDONESIA                |
| Tin      | PT Seirama Tin Investment   | INDONESIA                |
| Tin      | PT Koba Tin   | INDONESIA                |
| Tin      | PT Karimun Mining   | INDONESIA                |
| Tin      | PT Fang Di MulTindo   | INDONESIA                |
| Tin      | PT Eunindo Usaha Mandiri  | INDONESIA                |
| Tin      | PT DS Jaya Abadi  | INDONESIA                |
| Tin      | PT BilliTin Makmur Lestari  | INDONESIA                |
| Tin      | PT Bangka Timah Utama Sejahtera   | INDONESIA                |
| Tin      | PT Bangka Putra Karya   | INDONESIA                |
| Tin      | PT Bangka Kudai Tin   | INDONESIA                |
| Tin      | PT Alam Lestari Kencana   | INDONESIA                |
| Tin      | Novosibirsk Processing Plant Ltd.   | RUSSIAN FEDERATION       |
| Tin      | Linwu Xianggui Ore Smelting Co., Ltd.   | CHINA                    |
| Tin      | Huichang Jinshunda Tin Co., Ltd.  | CHINA                    |
| Tin      | Feinhutte Halsbrucke GmbH   | GERMANY                  |
| Tin      | CV United Smelting  | INDONESIA                |
| Tin      | PT Justindo   | INDONESIA                |
| Tin      | CV Gita Pesona  | INDONESIA                |
| Tin      | Cooperativa Metalurgica de Rond   | BRAZIL                   |
| Tin      | CNMC (Guangxi) PGMA Co., Ltd.   | CHINA                    |
| Tin      | Jiangxi Ketai Advanced Material Co., Ltd.   | CHINA                    |
| Tin      | Takehara PVD Materials Plant / PVD Materials Division of MITSUI MINING & SMELTING CO., LTD. | JAPAN                    |
| Tin      | yunnan xi ye gufen youxian gongsi   | CHINA                    |
| Tin      | Malaysia Smelting Corporation Berhad (Port Klang)   | MALAYSIA                 |
| Tungsten | A.L.M.T. Corp.  | JAPAN                    |
| Tungsten | Kennametal Huntsville   | UNITED STATES OF AMERICA |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd.  | CHINA                    |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd.  | CHINA                    |
| Tungsten | Global Tungsten & Powders Corp.   | UNITED STATES OF AMERICA |
| Tungsten | Hunan Jintai New Material Co., Ltd.   | CHINA                    |

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| Tungsten | Japan New Metals Co., Ltd.   | JAPAN                     |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd.                                    | CHINA                     |
| Tungsten | Kennametal Fallon  | UNITED STATES OF AMERICA  |
| Tungsten | Wolfram Bergbau und Hutten AG  | AUSTRIA                   |
| Tungsten | Xiamen Tungsten Co., Ltd.  | CHINA                     |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.                          | CHINA                     |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd.  | CHINA                     |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd.  | CHINA                     |
| Tungsten | Jiangxi Xincheng Tungsten Industry Co., Ltd.                                   | CHINA                     |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.                  | CHINA                     |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd.  | CHINA                     |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd.   | CHINA                     |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd.   | CHINA                     |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd.   | CHINA                     |
| Tungsten | Asia Tungsten Products Vietnam Ltd.  | VIETNAM                   |
| Tungsten | Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch | CHINA                     |
| Tungsten | H.C. Starck Tungsten GmbH  | GERMANY                   |
| Tungsten | Masan High-Tech Materials  | VIET NAM                  |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd.                                | CHINA                     |
| Tungsten | Niagara Refining LLC   | UNITED STATES OF AMERICA  |
| Tungsten | Ganzhou Haichuang Tungsten Co., Ltd.   | CHINA                     |
| Tungsten | Hydrometallurg, JSC  | RUSSIAN FEDERATION        |
| Tungsten | Unecha Refractory metals plant   | RUSSIAN FEDERATION        |
| Tungsten | Philippine Chuangxin Industrial Co., Inc.                                      | PHILIPPINES               |
| Tungsten | ACL Metais Eireli  | BRAZIL                    |
| Tungsten | Moliren Ltd.   | RUSSIAN FEDERATION        |
| Tungsten | HANNAE FOR T Co., Ltd.   | KOREA, REPUBLIC OF        |
| Tungsten | YUDU ANSHENG TUNGSTEN CO., LTD.  | CHINA                     |
| Tungsten | LLC Vostok   | RUSSIAN FEDERATION        |
| Tungsten | OOO  | RUSSIAN FEDERATION        |
| Tungsten | Fujian Xinlu Tungsten  | CHINA                     |
| Tungsten | Ganzhou Sunny Non-Ferrous Metals Co., Ltd.                                     | CHINA                     |
| Tungsten | Artek LLC  | RUSSIAN FEDERATION        |
| Tungsten | Cronimet Brasil Ltda   | BRAZIL                    |
| Tungsten | Albasteel Industria e Comercio de Ligas Para Fundicao Ltd.                     | BRAZIL                    |
| Tungsten | GEM Co., Ltd.  | CHINA                     |
| Tungsten | NPP Tyazhmetprom LLC   | RUSSIAN FEDERATION        |
| Tungsten | JSC "Kirovgrad Hard Alloys Plant"  | RUSSIAN FEDERATION        |
| Tungsten | Lianyou Metals Co., Ltd.   | TAIWAN, PROVINCE OF CHINA |
| Tungsten | Fujian Ganmin RareMetal Co., Ltd.  | CHINA                     |
| Tungsten | KGETS Co., Ltd.  | KOREA, REPUBLIC OF        |
| Tungsten | Hunan Litian Tungsten Industry Co., Ltd.                                       | CHINA                     |
| Tungsten | Woltech Korea Co., Ltd.  | KOREA, REPUBLIC OF        |

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| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.  | CHINA              |
| Tungsten | South-East Nonferrous Metal Company Limited of Hengyang City | CHINA              |
| Tungsten | Jiangxi Dayu Longxintai Tungsten Co., Ltd.                   | CHINA              |
| Tungsten | China Molybdenum Co., Ltd.                                   | CHINA              |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji              | CHINA              |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Yanglin           | CHINA              |
| Tungsten | Sanher Tungsten Vietnam Co., Ltd.                            | VIETNAM            |
| Tungsten | Ganzhou Yatai Tungsten Co., Ltd.                             | CHINA              |
| Tungsten | Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd.         | CHINA              |
| Tungsten | Pobedit, JSC   | RUSSIAN FEDERATION |
| Tungsten | Ganxian Shirui New Material Co., Ltd.                        | CHINA              |
| Tungsten | Dayu Jincheng Tungsten Industry Co., Ltd.                    | CHINA              |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd.                    | CHINA              |
| Tungsten | Vietnam Youngsun Tungsten Industry Co., Ltd.                 | VIETNAM            |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd.                          | VIETNAM            |
| Tungsten | Ganzhou Non-ferrous Metals Smelting Co., Ltd.                | CHINA              |
| Tungsten | Ganzhou Grand Sea W & Mo Group Co Ltd                        | CHINA              |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd.                             | CHINA              |
| Tungsten | Dayu Weiliang Tungsten Co., Ltd.                             | CHINA              |
| Tungsten | Shinwon Tungsten (Fujian Shanghang) Co., Ltd.                | CHINA              |
| Tungsten | Kenee Mining Corporation Vietnam                             | VIETNAM            |