# UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Washington, D.C. 20549

### FORM SD SPECIALIZED DISCLOSURE REPORT

### CURRENT REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE SECURITIES EXCHANGE ACT OF 1934

Date of report: May 15, 2020

## ESCO TECHNOLOGIES, INC.

(Exact name of the registrant as specified in its charter)

Missouri

(State or other jurisdiction of incorporation or organization)

1-10596

(Commission File Number)

43-1554045

(IRS Employer Identification No.)

9900A Clayton Road St. Louis, Missouri 63124-1186

(Address of principal executive offices) (Zip code)

(314) 213-7200

(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, 2019

#### **Section 1. Conflict Minerals Disclosure**

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

In accordance with Rule 13p-1 of the Securities Exchange Act of 1934, ESCO Technologies Inc. ("ESCO") is filing this Specialized Disclosure Form (Form SD) and the associated Conflict Minerals Report. This Form SD and the Conflict Minerals Report, as well as ESCO's Conflict Minerals Policy, are posted and publicly available on ESCO's corporate website *www.escotechnologies.com*. Information contained on ESCO's website does not constitute part of this Form SD or its Exhibits.

#### Item 1.02 Exhibit

The Conflict Minerals Report required by Item 1.01 is provided as Exhibit 1.01.

#### **Section 2. Exhibits**

#### **Item 2.01 Exhibits**

Exhibit No. Description

1.01 Conflict Minerals Report of ESCO Technologies Inc. for Calendar Year 2019

#### **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.

ESCO TECHNOLOGIES INC.

By /s/ Victor L. Richey
Victor L. Richey
Chairman, Chief Executive Officer and President

May 15, 2020

# CONFLICT MINERALS REPORT OF ESCO TECHNOLOGIES INC. FOR CALENDAR YEAR 2019

This is the Conflict Minerals Report of ESCO Technologies Inc. ("ESCO") for calendar year 2019 provided in accordance with Rule 13p-1 under the Securities Exchange Act of 1934 (the "Conflict Minerals Rule"). The Conflict Minerals Rule requires ESCO to perform certain procedures and disclose information about the use and origin of "Conflict Minerals" which are necessary to the functionality or production of products ESCO manufactures or contracts to have manufactured. "Conflict Minerals" are defined for purposes of the Conflict Minerals Rule as cassiterite, columbite-tantalite, wolframite, their respective derivatives tin, tantalum and tungsten, and gold.

ESCO Technologies is a global provider of highly engineered products and solutions to diverse and growing end-markets that include the aerospace, space, healthcare, wireless, consumer electronics, electric utility, and renewable energy industries. During 2019, ESCO conducted its business in four operating segments, through a number of wholly-owned direct and indirect subsidiaries. These segments, together with the significant domestic and foreign operating subsidiaries within each segment during 2019, were as follows; more complete information about the Company and its subsidiaries is provided on the Company's website and in its latest Form 10-K filed with the Securities and Exchange Commission:

#### Aerospace and Defense:

Crissair, Inc.
Globe Composite Solutions, LLC
Hi-Tech Metals, Inc.
Mayday Manufacturing Co.
PTI Technologies Inc.
VACCO Industries
Westland Technologies, Inc.

#### RF Shielding and Test:

ETS-Lindgren Inc.

#### **Utility Solutions Group:**

Doble Engineering Company Morgan Schaffer Ltd. NRG Systems, Inc.

#### **Technical Packaging:**

Thermoform Engineered Quality LLC Plastique Limited

ESCO's products require a wide variety of components and materials, and Conflict Minerals that are necessary to the functionality or production of ESCO's products are common across its product portfolio. ESCO sources its components and subassemblies from a global supply base that includes distributors, value-added resellers, original equipment manufacturers and contract manufacturers.

#### ESCO's Reasonable Country of Origin Inquiry

In accordance with the Conflict Minerals Rule, ESCO has performed a "reasonable country of origin inquiry" ("RCOI") on Conflict Minerals in its supply chain to determine whether these Conflict Minerals were sourced from the Democratic Republic of Congo ("DRC") or adjoining countries or were from recycled or scrap sources.

As a result of its RCOI process, ESCO has concluded in good faith that during 2019:

- Conflict Minerals were necessary to the functionality or production of many of the products ESCO manufactured or contracted to have manufactured; and
- · ESCO was not able to reach a conclusion as to all sources of the Conflict Minerals necessary to the functionality or production of the products it manufactured or contracted to have manufactured.

#### **Description of ESCO's Due Diligence**

ESCO designed and performed its due diligence measures to conform in all material respects with the Organisation for Economic Cooperation and Development ("OECD") Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas (the "OECD Guidance") and related Supplements for each of the Conflict Minerals.

ESCO's due diligence measures were based on the OECD Guidance. Because ESCO is many steps removed from the mining of Conflict Minerals and does not purchase raw ore or unrefined Conflict Minerals, the due diligence included extensive communications with its suppliers. ESCO has focused its efforts since the second reporting year on its suppliers and contract manufacturers in an effort to continue to build Conflict Mineral awareness, assess the transparency of its supply chain and identify the smelters/refiners in its supply chain.

ESCO maintains a system of internal procedures and controls to identify and trace Conflict Minerals within its supply chain. A summary of ESCO's activities, which are in line with the OECD Guidance, are outlined below.

Step 1: Establish strong company management systems

- · ESCO maintains a formal policy that reflects its desire to achieve a "DRC conflict free" determination over time.
- ESCO maintains a governance model to oversee the implementation and ongoing management of its Conflict Minerals Compliance Program, including a Conflict Minerals Core Team with representatives from each significant subsidiary, led by its Assistant General Counsel, to develop policies, standards and processes that relate to the identification of Conflict Minerals risk in its supply chain. The Core Team solicits the participation of leadership from the various ESCO business units to maintain a governance structure which enables sustainable compliance and actively mitigates the risk of not meeting regulatory requirements. The Core Team is responsible for developing policies and standards as well as developing and maintaining a project charter, compliance project plan, communication strategy, awareness training, project status report, and standard retention policy.

- ESCO maintains an annual process to evaluate parts and suppliers in its supply chain for potential Conflict Minerals risk, with some subsidiaries automating the collection of this information.
- In alignment with the OECD Guidance, each of ESCO's subsidiaries identifies and assesses the risks in its supply chain by conducting a risk-rated analysis of its products, parts, and suppliers.
- · Supplier agreements across the ESCO subsidiaries require suppliers to annually provide information on their use and source of Conflict Minerals.
- ESCO continues to adapt its internal processes, procedures and systems to accommodate the capture, maintenance, retrieval and reporting of Conflict Minerals supplier and parts status, thereby improving transparency and the ability to certify its status in forthcoming years.
- · ESCO annually provides compliance training for at-risk suppliers.
- ESCO engages with its suppliers to gain greater visibility into their supply chains, in order to make better sourcing decisions.
- ESCO provides a feedback mechanism, managed by an ombudsman, on its website at *www.escotechnologies.com* which is available to all interested parties to provide information or voice their concerns regarding ESCO's sourcing and use of Conflict Minerals in its products.

#### Step 2: Identify and assess risks in the supply chain

- On an annual basis, ESCO performs due diligence to identify the parts within each of its subsidiary's active bills of materials ("BOMs") that are known or are likely to contain Conflict Minerals using a risk-based approach and to further identify the supplier(s) from who those parts are sourced.
- · ESCO requests that its suppliers complete a survey at the part level, providing information found on the Responsible Minerals Initiative's (RMI) Conflict Minerals Reporting Template (CMRT).
- ESCO reviews survey responses received from suppliers for completeness, validates for sufficiency and follows up with any supplier that did not complete the survey, through an intensive outreach program including emails and telephone calls.
- · ESCO reviews aggregated supplier survey responses and reports key RCOI metrics as part of bi-weekly Conflict Minerals reporting.
- ESCO conducts a review of summary smelter information to determine if each smelter was certified as conformant or if supporting information presents a "red flag" as defined by the OECD Guidance, such as sourcing from a non-conformant smelter in the DRC or surrounding countries.
- · ESCO disseminates the summary due diligence results and corresponding smelters to customer-facing personnel who in turn respond to customer inquiries in the form of subsidiary level CMRTs.

#### Step 3: Design and implement a strategy to respond to identified risks

- · Annually, ESCO completes an OECD Gap Analysis at the conclusion of its due diligence and provides a summary of the identified risks and gaps to senior management with recommended action plans to reduce risks and close gaps.
- · ESCO maintains a risk mitigation strategy with the goal of systematically reducing the extent of exposure to Conflict Minerals risks and the likelihood of their occurrence.
- · Conflict mineral reporting requirements are being integrated into ESCO's broader internal control procedures.
- ESCO continues to integrate its policies, procedures and systems modifications in a systematic and deliberate manner that will make them integral to ESCO's business and establish the capability to routinely obtain, maintain, and retrieve the key data required to demonstrate reasonable efforts for compliance for both regulatory requirements and customer inquiries.
- ESCO's subsidiaries continue to make progress in integrating conflict minerals into ERP systems to include the Conflict Minerals Status as a field within the master part list as Conformant, Non-Conformant, Undeterminable or Out of Scope.
- · As ESCO reviews supplier responses to the RCOI, any risks identified will be evaluated, and opportunities to mitigate risks will be addressed.
- ESCO will address unresponsive suppliers and determine options for corrective actions. ESCO subsidiaries continue to assertively outreach to unresponsive suppliers.
- Additional fact finding, risk assessments, and changes in circumstances will take place as part of ESCO's annual review of its Conflict Minerals
  compliance program.

#### Step 4: Carry out independent third-party audit of smelters'/refiners' due diligence practices

- ESCO cooperates and participates with industry associations to enhance transparency and traceability in the supply chain and supports independent third-party audits of smelters'/refiners' due diligence by independent industry associations who perform these audits.
- · Given the nature of ESCO's businesses, their positions in the supply chain, the associated cost, and the current lack of transparency in the supply chain, ESCO is not able to audit smelters/refiners directly.

#### Step 5: Report annually on supply chain due diligence

· ESCO performs due diligence on its conflict minerals supply chain annually, maintains a process to summarize, review, and approve compliance results and completion of the Form SD and the Conflict Minerals Report and assure timely filing of these documents with the SEC.

#### **Continuous Improvement of Supply Chain Due Diligence**

ESCO will continue to improve its due diligence efforts through increasingly focused efforts including (but not limited to):

- · ESCO is working with its subsidiaries to automate the process of identifying parts and suppliers engaged with during the reporting year, as well as the storage and dissemination of results for customer reporting.
- · ESCO will continue to require suppliers to identify the 3TG contained in the products they supply and on an annual basis provide current, accurate and complete information on the smelters and refiners used in the manufacture of parts supplied to ESCO.
- In an effort to improve supplier response rates for parts purchased from third party distributors, ESCO will strive to identify and survey the manufacturer of parts.
- · ESCO will continue to integrate newly acquired subsidiaries into the ESCO Conflict Minerals program and ensure that all new subsidiaries perform the required risk identification and due diligence to identify the smelters in their supply chain. For 2019, Globe Composites Solutions, LLC was included in the Company's RCOI and overall determination.

#### Determination

Based on the process described above, ESCO received responses from 707 direct material suppliers, representing 52% of total suppliers surveyed and 63% of the active parts surveyed that were used in its 2019 manufactured goods. ESCO believes the lower response rate, as compared to prior years, is likely attributable to the impact of the current COVID-19 coronavirus pandemic.

Based on the information provided by ESCO's suppliers utilized during 2019, ESCO believes that the facilities that may have been used to process 3TGs in ESCO's products include the smelters and refiners listed in Appendix I, starting on page 6. The supplier responses included Conformant, Active, Known and Unknown smelters, but based on the absence of reliable information on the Unknown smelters, only the Conformant, Active and Known smelters have been included.

Based on the due diligence efforts and the absence of full supply chain visibility throughout the supply base, ESCO is unable to determine the source of origin of the conflict minerals and does not have sufficient information to conclusively determine the countries of origin of 3TGs contained in ESCO's products.

#### APPENDIX I

Metal	Smelter Identification Number	Smelter Name	Smelter Country	Smelter Status
Gold	CID002763	8853 S.p.A.	ITALY	Conformant
Gold	CID002708	Abington Reldan Metals, LLC	UNITED STATES OF AMERICA	Known
Gold	CID000015	Advanced Chemical Company	UNITED STATES OF AMERICA	Conformant
Gold	CID003185	African Gold Refinery	UGANDA	Known
Gold	CID000019	Aida Chemical Industries Co., Ltd.	JAPAN	Conformant
Gold	CID002560	Al Etihad Gold Refinery DMCC	UNITED ARAB EMIRATES	Known
Gold	CID000035	Allgemeine Gold-und Silberscheideanstalt A.G.	GERMANY	Conformant
Gold	CID000041	Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN	Conformant
Gold	CID000058	AngloGold Ashanti Corrego do Sitio Mineracao	BRAZIL	Conformant
Gold	CID000077	Argor-Heraeus S.A.	SWITZERLAND	Conformant
Gold	CID000082	Asahi Pretec Corp.	JAPAN	Conformant
Gold	CID000924	Asahi Refining Canada Ltd.	CANADA	Conformant
Gold	CID000920	Asahi Refining USA Inc.	UNITED STATES OF AMERICA	Conformant
Gold	CID000090	Asaka Riken Co., Ltd.	JAPAN	Conformant
Gold	CID000103	Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	TURKEY	Known
Gold	CID002850	AU Traders and Refiners	SOUTH AFRICA	Conformant
Gold	CID000113	Aurubis AG	GERMANY	Conformant
Gold	CID002863	Bangalore Refinery	INDIA	Conformant
Gold	CID000128	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES	Conformant
Gold	CID000157	Boliden AB	SWEDEN	Conformant
Gold	CID000176	C. Hafner GmbH + Co. KG	GERMANY	Conformant
Gold	CID000180	Caridad	MEXICO	Known
Gold	CID000185	CCR Refinery - Glencore Canada Corporation	CANADA	Conformant
Gold	CID000189	Cendres + Metaux S.A.	SWITZERLAND	Conformant
Gold	CID003382	CGR Metalloys Pvt Ltd.	INDIA	Known
Gold	CID000233	Chimet S.p.A.	ITALY	Conformant
Gold	CID000264	Chugai Mining	JAPAN	Conformant
Gold	CID000328	Daejin Indus Co., Ltd.	KOREA, REPUBLIC OF	Known
Gold	CID000343	Daye Non-Ferrous Metals Mining Ltd.	CHINA	Known
Gold	CID002867	Degussa Sonne / Mond Goldhandel GmbH	GERMANY	Known
Gold	CID003348	Dijllah Gold Refinery FZC	UNITED ARAB EMIRATES	Known
Gold	CID000362	DODUCO Contacts and Refining GmbH	GERMANY	Conformant
Gold	CID000401	Dowa	JAPAN	Conformant
Gold	CID003195	DS PRETECH Co., Ltd.	KOREA, REPUBLIC OF	Conformant
Gold	CID000359	DSC (Do Sung Corporation)	KOREA, REPUBLIC OF	Conformant
Gold	CID000425	Eco-System Recycling Co., Ltd.	JAPAN	Conformant
Gold	CID001322	Elemetal Refining, LLC	UNITED STATES OF AMERICA	Known
Gold	CID002561	Emirates Gold DMCC	UNITED ARAB EMIRATES	Conformant
Gold	CID002515	Fidelity Printers and Refiners Ltd.	ZIMBABWE	Known
Gold	CID002584	Fujairah Gold FZC	UNITED ARAB EMIRATES	Known
Gold	CID002852	GCC Gujrat Gold Centre Pvt. Ltd.	INDIA	Known

25.1	Smelter Identification			
Metal	Number	Smelter Name	Smelter Country	Smelter Status
Gold	CID002459	Geib Refining Corporation	UNITED STATES OF AMERICA	Conformant
Gold	CID002243	Gold Refinery of Zijin Mining Group Co., Ltd.	CHINA	Conformant
Gold	CID001909	Great Wall Precious Metals Co., Ltd. of CBPM	CHINA	Known
Gold	CID002312	Guangdong Jinding Gold Limited	CHINA	Known
Gold	CID000651	Guoda Safina High-Tech Environmental Refinery Co., Ltd.	CHINA	Known
Gold	CID000671	Hangzhou Fuchunjiang Smelting Co., Ltd.	CHINA	Known
Gold	CID000689	HeeSung Metal Ltd.	KOREA, REPUBLIC OF	Conformant
Gold	CID000694	Heimerle + Meule GmbH	GERMANY	Conformant
Gold	CID002519	Henan Yuguang Gold & Lead Co., Ltd.	CHINA	Known
Gold	CID000707	Heraeus Metals Hong Kong Ltd.	CHINA	Conformant
Gold	CID000711	Heraeus Precious Metals GmbH & Co. KG	GERMANY	Conformant
Gold	CID000767	Hunan Chenzhou Mining Co., Ltd.	CHINA	Known
Gold	CID000773	Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd.	CHINA	Known
Gold	CID000778	HwaSeong CJ CO., LTD.	KOREA, REPUBLIC OF	Known
Gold	CID000801	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CHINA	Conformant
Gold	CID002562	International Precious Metal Refiners	UNITED ARAB EMIRATES	Known
Gold	CID000807	Ishifuku Metal Industry Co., Ltd.	JAPAN	Conformant
Gold	CID000814	Istanbul Gold Refinery	TURKEY	Conformant
Gold	CID002765	Italpreziosi	ITALY	Conformant
Gold	CID000823	Japan Mint	JAPAN	Conformant
Gold	CID000855	Jiangxi Copper Co., Ltd.	CHINA	Conformant
Gold	CID000927	JSC Ekaterinburg Non-Ferrous Metal Processing Plant	RUSSIAN FEDERATION	Known
Gold	CID000929	JSC Uralelectromed	RUSSIAN FEDERATION	Conformant
Gold	CID000937	JX Nippon Mining & Metals Co., Ltd.	JAPAN	Conformant
Gold	CID002563	Kaloti Precious Metals	UNITED ARAB EMIRATES	Known
Gold	CID000956	Kazakhmys Smelting LLC	KAZAKHSTAN	Known
Gold	CID000957	Kazzinc	KAZAKHSTAN	Conformant
Gold	CID000969	Kennecott Utah Copper LLC	UNITED STATES OF AMERICA	Conformant
Gold	CID002511	KGHM Polska Miedz Spolka Akcyjna	POLAND	Conformant
Gold	CID000981	Kojima Chemicals Co., Ltd.	JAPAN	Conformant
Gold	CID002605	Korea Zinc Co., Ltd.	KOREA, REPUBLIC OF	Conformant
Gold	CID001029	Kyrgyzaltyn JSC	KYRGYZSTAN	Conformant
Gold	CID002865	Kyshtym Copper-Electrolytic Plant ZAO	RUSSIAN FEDERATION	Known
Gold	CID001032	L'azurde Company For Jewelry	SAUDI ARABIA	Known
Gold	CID001056	Lingbao Gold Co., Ltd.	CHINA	Known
Gold	CID001058	Lingbao Jinyuan Tonghui Refinery Co., Ltd.	CHINA	Known
Gold	CID002762	L'Orfebre S.A.	ANDORRA	Conformant
Gold	CID001078	LS-NIKKO Copper Inc.	KOREA, REPUBLIC OF	Conformant
Gold	CID001093	Luoyang Zijin Yinhui Gold Refinery Co., Ltd.	CHINA	Known
Gold	CID002606	Marsam Metals	BRAZIL	Conformant
Gold	CID001113	Materion	UNITED STATES OF AMERICA	Conformant
Gold	CID001119	Matsuda Sangyo Co., Ltd.	JAPAN	Conformant

	Smelter Identification			
Metal	Number	Smelter Name	Smelter Country	Smelter Status
Gold	CID001149	Metalor Technologies (Hong Kong) Ltd.	CHINA	Conformant
Gold	CID001152	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE	Conformant
Gold	CID001147	Metalor Technologies (Suzhou) Ltd.	CHINA	Conformant
Gold	CID001153	Metalor Technologies S.A.	SWITZERLAND	Conformant
Gold	CID001157	Metalor USA Refining Corporation	UNITED STATES OF AMERICA	Conformant
Gold	CID001161	Metalurgica Met-Mex Penoles S.A. De C.V.	MEXICO	Conformant
Gold	CID001188	Mitsubishi Materials Corporation	JAPAN	Conformant
Gold	CID001193	Mitsui Mining and Smelting Co., Ltd.	JAPAN	Conformant
Gold	CID002509	MMTC-PAMP India Pvt., Ltd.	INDIA	Conformant
Gold	CID002857	Modeltech Sdn Bhd	MALAYSIA	Known
Gold	CID002282	Morris and Watson	NEW ZEALAND	Known
Gold	CID002866	Morris and Watson Gold Coast	AUSTRALIA	Known
Gold	CID001204	Moscow Special Alloys Processing Plant	RUSSIAN FEDERATION	Conformant
Gold	CID001220	Nadir Metal Rafineri San. Ve Tic. A.S.	TURKEY	Conformant
Gold	CID001236	Navoi Mining and Metallurgical Combinat	UZBEKISTAN	Known
Gold	CID003189	NH Recytech Company	KOREA, REPUBLIC OF	Known
Gold	CID001259	Nihon Material Co., Ltd.	JAPAN	Conformant
Gold	CID002779	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	AUSTRIA	Conformant
Gold	CID001325	Ohura Precious Metal Industry Co., Ltd.	JAPAN	Conformant
Gold	CID001326	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	RUSSIAN FEDERATION	Conformant
Gold	CID000493	OJSC Novosibirsk Refinery	RUSSIAN FEDERATION	Conformant
Gold	CID001352	PAMP S.A.	SWITZERLAND	Conformant
Gold	CID002872	Pease & Curren	UNITED STATES OF AMERICA	Known
Gold	CID001362	Penglai Penggang Gold Industry Co., Ltd.	CHINA	Known
Gold	CID002919	Planta Recuperadora de Metales SpA	CHILE	Conformant
Gold	CID001386	Prioksky Plant of Non-Ferrous Metals	RUSSIAN FEDERATION	Conformant
Gold	CID001397	PT Aneka Tambang (Persero) Tbk	INDONESIA	Conformant
Gold	CID001498	PX Precinox S.A.	SWITZERLAND	Conformant
Gold	CID003324	QG Refining, LLC	UNITED STATES OF AMERICA	Known
Gold	CID001512	Rand Refinery (Pty) Ltd.	SOUTH AFRICA	Conformant
Gold	CID000522	Refinery of Seemine Gold Co., Ltd.	CHINA	Known
Gold	CID002582	REMONDIS PMR B.V.	NETHERLANDS	Conformant
Gold	CID002510	Republic Metals Corporation	UNITED STATES OF AMERICA	Known
Gold	CID001534	Royal Canadian Mint	CANADA	Conformant
Gold	CID002761	SAAMP	FRANCE	Conformant
Gold	CID001546	Sabin Metal Corp.	UNITED STATES OF AMERICA	Known
Gold	CID002973	Safimet S.p.A	ITALY	Conformant
Gold	CID002290	SAFINA A.S.	CZECHIA	Active
Gold	CID002853	Sai Refinery	INDIA	Known
Gold	CID001555	Samduck Precious Metals	KOREA, REPUBLIC OF	Conformant
Gold	CID001562	Samwon Metals Corp.	KOREA, REPUBLIC OF	Known

	Smelter Identification			
Metal	Number	Smelter Name	Smelter Country	Smelter Status
Gold	CID002777	SAXONIA Edelmetalle GmbH	GERMANY	Conformant
Gold	CID001573	Schone Edelmetaal B.V.	NETHERLANDS	Known
Gold	CID001585	SEMPSA Joyeria Plateria S.A.	SPAIN	Conformant
Gold	CID002525	Shandong Humon Smelting Co., Ltd.	CHINA	Known
Gold	CID001619	Shandong Tiancheng Biological Gold Industrial Co., Ltd.	CHINA	Known
Gold	CID001622	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CHINA	Conformant
Gold	CID002527	Shenzhen Zhonghenglong Real Industry Co., Ltd.	CHINA	Known
Gold	CID001736	Sichuan Tianze Precious Metals Co., Ltd.	CHINA	Conformant
Gold	CID002516	Singway Technology Co., Ltd.	TAIWAN	Conformant
Gold	CID003424	Smelter not listed	JAPAN	Known
Gold	CID003425	Smelter not listed	JAPAN	Known
Gold	CID000141	Smelter not yet identified	GERMANY	Known
Gold	CID001754	So Accurate Group, Inc.	UNITED STATES OF AMERICA	Known
Gold	CID001756	SOE Shyolkovsky Factory of Secondary Precious Metals	RUSSIAN FEDERATION	Conformant
Gold	CID001761	Solar Applied Materials Technology Corp.	TAIWAN	Conformant
Gold	CID003383	Sovereign Metals	INDIA	Known
Gold	CID003153	State Research Institute Center for Physical Sciences and Technology	LITHUANIA	Known
Gold	CID002567	Sudan Gold Refinery	SUDAN	Known
Gold	CID001798	Sumitomo Metal Mining Co., Ltd.	JAPAN	Conformant
Gold	CID002918	SungEel HiMetal Co., Ltd.	KOREA, REPUBLIC OF	Conformant
Gold	CID001810	Super Dragon Technology Co., Ltd.	TAIWAN	Known
Gold	CID002580	T.C.A S.p.A	ITALY	Conformant
Gold	CID001875	Tanaka Kikinzoku Kogyo K.K.	JAPAN	Conformant
Gold	CID001916	The Refinery of Shandong Gold Mining Co., Ltd.	CHINA	Conformant
Gold	CID001938	Tokuriki Honten Co., Ltd.	JAPAN	Conformant
Gold	CID001947	Tongling Nonferrous Metals Group Co., Ltd.	CHINA	Known
Gold	CID002587	Tony Goetz NV	BELGIUM	Known
Gold	CID002615	TOO Tau-Ken-Altyn	KAZAKHSTAN	Known
Gold	CID001955	Torecom	KOREA, REPUBLIC OF	Conformant
Gold	CID001977	Umicore Brasil Ltda.	BRAZIL	Conformant
Gold	CID002314	Umicore Precious Metals Thailand	THAILAND	Conformant
Gold	CID001980	Umicore S.A. Business Unit Precious Metals Refining	BELGIUM	Conformant
Gold	CID001993	United Precious Metal Refining, Inc.	UNITED STATES OF AMERICA	Conformant
Gold	CID002854	Universal Precious Metals Refining Zambia	ZAMBIA	Known
Gold	CID002003	Valcambi S.A.	SWITZERLAND	Conformant
Gold	CID002030	Western Australian Mint (T/a The Perth Mint)	AUSTRALIA	Conformant
Gold	CID002778	WIELAND Edelmetalle GmbH	GERMANY	Conformant
Gold	CID002100	Yamakin Co., Ltd.	JAPAN	Conformant
Gold	CID002129	Yokohama Metal Co., Ltd.	JAPAN	Conformant
Gold	CID000197	Yunnan Copper Industry Co., Ltd.	CHINA	Known
Gold	CID002214	Zhongkuang Gold Industry Co., Ltd.	CHINA	Known

	Smelter			
Metal	Identification Number	Smelter Name	Smelter Country	Smelter Status
Gold	CID002224	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA	Conformant
Tantalum	CID002224	Asaka Riken Co., Ltd.	JAPAN	Conformant
Tantalum	CID000032	Changsha South Tantalum Niobium Co., Ltd.	CHINA	Conformant
Tantatum			UNITED STATES OF	Comormant
Tantalum	CID003402	CP Metals Inc.	AMERICA	Active
Tantalum	CID002504	D Block Metals, LLC	UNITED STATES OF AMERICA	Conformant
Tantalum	CID000410	Duoluoshan	CHINA	Known
Tantalum	CID000456	Exotech Inc.	UNITED STATES OF AMERICA	Conformant
Tantalum	CID000460	F&X Electro-Materials Ltd.	CHINA	Conformant
Tantalum	CID002505	FIR Metals & Resource Ltd.	CHINA	Conformant
Tantalum	CID002558	Global Advanced Metals Aizu	JAPAN	Conformant
Tantalon	CID002557	Clabal Advanced Metala December on	UNITED STATES OF	Carefarrant
Tantalum	CID00255/	Global Advanced Metals Boyertown	AMERICA	Conformant
Tantalum	CID000291	Guangdong Rising Rare Metals-EO Materials Ltd.	CHINA	Conformant
Tantalum	CID000616	Guangdong Zhiyuan New Material Co., Ltd.	CHINA	Conformant
Tantalum	CID002544	H.C. Starck Co., Ltd.	THAILAND	Conformant
Tantalum	CID002546	H.C. Starck GmbH Laufenburg	GERMANY	Known
Tantalum	CID002547	H.C. Starck Hermsdorf GmbH	GERMANY	Conformant
Tantalum	CID002548	H.C. Starck Inc.	UNITED STATES OF AMERICA	Conformant
Tantalum	CID002549	H.C. Starck Ltd.	JAPAN	Conformant
Tantalum	CID002550	H.C. Starck Smelting GmbH & Co. KG	GERMANY	Conformant
Tantalum	CID002545	H.C. Starck Tantalum and Niobium GmbH	GERMANY	Conformant
Tantalum	CID002492	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA	Conformant
Tantalum	CID000731	Hi-Temp	UNITED STATES OF AMERICA	Known
Tantalum	CID002512	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHINA	Conformant
Tantalum	CID002842	Jiangxi Tuohong New Raw Material	CHINA	Conformant
Tantalum	CID003191	Jiujiang Janny New Material Co., Ltd.	CHINA	Known
Tantalum	CID000914	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINA	Conformant
Tantalum	CID000917	Jiujiang Tanbre Co., Ltd.	CHINA	Conformant
Tantalum	CID002506	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA	Conformant
Tantalum	CID002539	KEMET Blue Metals	MEXICO	Conformant
Tantalum	CID002568	KEMET Blue Powder	UNITED STATES OF AMERICA	Conformant
Tantalum	CID000973	King-Tan Tantalum Industry Ltd.	CHINA	Known
Tantalum	CID001076	LSM Brasil S.A.	BRAZIL	Conformant
Tantalum	CID001163	Metallurgical Products India Pvt., Ltd.	INDIA	Conformant
Tantalum	CID001175	Mineracao Taboca S.A.	BRAZIL	Conformant
Tantalum	CID001192	Mitsui Mining and Smelting Co., Ltd.	JAPAN	Conformant
Tantalum	CID001277	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA	Conformant
Tantalum	CID001200	NPM Silmet AS	ESTONIA	Conformant
Tantalum	CID002556	Plansee SE Reutte	AUSTRIA	Known
Tantalum	CID002847	Power Resources Ltd.	MACEDONIA, THE FORMER YUGOSLAV REPUBLIC OF	Conformant
Tantalum	CID001508	QuantumClean	UNITED STATES OF AMERICA	Conformant
Tantalum	CID002707	Resind Industria e Comercio Ltda.	BRAZIL	Conformant

Matal	Smelter Identification Number	Considerati Name	Sunday County	Consideration States
Metal	Number	Smelter Name	Smelter Country	Smelter Status
Tantalum	CID001522	RFH Tantalum Smeltery Co., Ltd./Yanling Jincheng Tantalum & Niobium Co., Ltd.	CHINA	Conformant
Tantalum	CID001769	Solikamsk Magnesium Works OAO	RUSSIAN FEDERATION	Conformant
Tantalum	CID001869	Taki Chemical Co., Ltd.	JAPAN	Conformant
Tantalum	CID001891	Telex Metals	UNITED STATES OF AMERICA	Conformant
Tantalum	CID001969	Ulba Metallurgical Plant JSC	KAZAKHSTAN	Conformant
Tantalum	CID002508	XinXing HaoRong Electronic Material Co., Ltd.	CHINA	Conformant
Tantalum	CID002307	Yichun Jin Yang Rare Metal Co., Ltd.	CHINA	Known
Tantalum	CID002232	Zhuzhou Cemented Carbide Group	CHINA	Known
Tin	CID000292	Alpha	UNITED STATES OF AMERICA	Conformant
Tin	CID002703	An Vinh Joint Stock Mineral Processing Company	VIETNAM	Known
Tin	CID002502	Asia Tungsten Products Vietnam Ltd.	INDONESIA	Known
Tin	CID000228	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CHINA	Conformant
Tin	CID003190	Chifeng Dajingzi Tin Industry Co., Ltd.	CHINA	Conformant
Tin	CID001070	China Tin Group Co., Ltd.	CHINA	Conformant
Tin	CID000278	CNMC (Guangxi) PGMA Co., Ltd.	CHINA	Known
Tin	CID002570	CV Ayi Jaya	INDONESIA	Conformant
Tin	CID002592	CV Dua Sekawan	INDONESIA	Conformant
Tin	CID000306	CV Gita Pesona	INDONESIA	Conformant
Tin	CID000315	CV United Smelting	INDONESIA	Conformant
Tin	CID002455	CV Venus Inti Perkasa	INDONESIA	Conformant
Tin	CID003356	Dongguan CiEXPO Environmental Engineering Co., Ltd.	CHINA	Known
Tin	CID000402	Dowa	JAPAN	Conformant
Tin	CID002572	Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company	VIETNAM	Known
Tin	CID000438	EM Vinto	BOLIVIA	Conformant
Tin	CID000448	Estanho de Rondonia S.A.	BRAZIL	Known
Tin	CID000468	Fenix Metals	POLAND	Conformant
Tin	CID002536	Ganzhou Yatai Tungsten Co., Ltd.	CHINA	Known
Tin	CID003410	Gejiu City Fuxiang Industry and Trade Co., Ltd."	CHINA	Known
Tin	CID002848	Gejiu Fengming Metallurgy Chemical Plant	CHINA	Conformant
Tin	CID002859	Gejiu Jinye Mineral Company	BRAZIL	Known
Tin	CID000942	Gejiu Kai Meng Industry and Trade LLC	CHINA	Conformant
Tin	CID000538	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA	Conformant
Tin	CID001908	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	CHINA	Conformant
Tin	CID000555	Gejiu Zili Mining And Metallurgy Co., Ltd.	CHINA	Conformant
Tin	CID003116	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CHINA	Conformant
Tin	CID002849	Guanyang Guida Nonferrous Metal Smelting Plant	CHINA	Conformant
Tin	CID002844	HuiChang Hill Tin Industry Co., Ltd.	CHINA	Conformant
Tin	CID002044	Huichang Jinshunda Tin Co., Ltd.	CHINA	Conformant
Tin	CID000760	Jiangxi Ketai Advanced Material Co., Ltd.	PERU	Known
Tin	CID001231	Jiangxi New Nanshan Technology Ltd.	CHINA	Conformant
Tin	CID002535	Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd.	CHINA	Known
1111	GID002333	Jungai Andriai Andriggan Homenous Medals Co., Liu.	Gilliui	IXIIOWII

	Smelter Identification			
Metal	Number	Smelter Name	Smelter Country	<b>Smelter Status</b>
Tin	CID003379	Ma'anshan Weitai Tin Co., Ltd.	CHINA	Conformant
Tin	CID002468	Magnu's Minerais Metais e Ligas Ltda.	BRAZIL	Conformant
Tin	CID001105	Malaysia Smelting Corporation (MSC)	MALAYSIA	Conformant
Tin	CID002500	Melt Metais e Ligas S.A.	BRAZIL	Conformant
Tin	CID0002500	Melt Metais e Ligas S.A.	BRAZIL	Known
Tin	CID001142	Metallic Resources, Inc.	UNITED STATES OF AMERICA	Conformant
Tin	CID002773	Metallo Belgium N.V.	BELGIUM	Conformant
Tin	CID002774	Metallo Spain S.L.U.	SPAIN	Conformant
Tin	CID001173	Mineracao Taboca S.A.	BRAZIL	Conformant
Tin	CID001182	Minsur	PERU	Conformant
Tin	CID001191	Mitsubishi Materials Corporation	JAPAN	Conformant
Tin	CID002858	Modeltech Sdn Bhd	MALAYSIA	Known
Tin	CID002573	Nghe Tinh Non-Ferrous Metals Joint Stock Company	VIETNAM	Known
Tin	CID001314	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND	Conformant
Tin	CID002517	O.M. Manufacturing Philippines, Inc.	PHILIPPINES	Conformant
Tin	CID001337	Operaciones Metalurgicas S.A.	BOLIVIA	Conformant
Tin	CID002540	Plansee SE Liezen	UNITED STATES OF AMERICA	Known
Tin	CID003208	Pongpipat Company Limited	MYANMAR	Known
Tin	CID003409	Precious Minerals and Smelting Limited	INDIA	Active
Tin	CID000309	PT Aries Kencana Sejahtera	INDONESIA	Conformant
Tin	CID001399	PT Artha Cipta Langgeng	INDONESIA	Conformant
Tin	CID002503	PT ATD Makmur Mandiri Jaya	INDONESIA	Conformant
Tin	CID001402	PT Babel Inti Perkasa	INDONESIA	Conformant
Tin	CID001406	PT Babel Surya Alam Lestari	INDONESIA	Conformant
Tin	CID002776	PT Bangka Prima Tin	INDONESIA	Conformant
Tin	CID003205	PT Bangka Serumpun	INDONESIA	Conformant
Tin	CID001419	PT Bangka Tin Industry	INDONESIA	Conformant
Tin	CID001421	PT Belitung Industri Sejahtera	INDONESIA	Conformant
Tin	CID001428	PT Bukit Timah	INDONESIA	Conformant
Tin	CID001434	PT DS Jaya Abadi	INDONESIA	Conformant
Tin	CID001438	PT Eunindo Usaha Mandiri	CHINA	Known
Tin	CID002530	PT Inti Stania Prima	INDONESIA	Conformant
Tin	CID001448	PT Karimun Mining	INDONESIA	Conformant
Tin	CID002829	PT Kijang Jaya Mandiri	INDONESIA	Conformant
Tin	CID002870	PT Lautan Harmonis Sejahtera	INDONESIA	Known
Tin	CID002835	PT Menara Cipta Mulia	INDONESIA	Conformant
Tin	CID001453	PT Mitra Stania Prima	INDONESIA	Conformant
Tin	CID002757	PT O.M. Indonesia	CHINA	Known
Tin	CID001457	PT Panca Mega Persada	INDONESIA	Conformant
Tin	CID000313	PT Premium Tin Indonesia	INDONESIA	Conformant
Tin	CID001458	PT Prima Timah Utama	INDONESIA	Conformant
Tin	CID003381	PT Rajawali Rimba Perkasa	INDONESIA	Conformant

	Smelter			
Massal	Identification Number	Consider Name	San altern Constant	Consider Charles
Metal		Smelter Name	Smelter Country	Smelter Status
Tin	CID002593	PT Rajehan Ariq	INDONESIA	Conformant
Tin	CID001460	PT Refined Bangka Tin	INDONESIA	Conformant
Tin	CID001463	PT Sariwiguna Binasentosa	INDONESIA	Conformant
Tin	CID001468	PT Stanindo Inti Perkasa	INDONESIA	Conformant
Tin	CID002816	PT Sukses Inti Makmur	INDONESIA	Conformant
Tin	CID001471	PT Sumber Jaya Indah	INDONESIA	Conformant
Tin	CID001477	PT Timah Tbk Kundur	INDONESIA	Conformant
Tin	CID001482	PT Timah Tbk Mentok	INDONESIA	Conformant
Tin	CID001490	PT Tinindo Inter Nusa	INDONESIA	Conformant
Tin	CID002478	PT Tirus Putra Mandiri	INDONESIA	Conformant
Tin	CID001493	PT Tommy Utama	INDONESIA	Conformant
Tin	CID002706	Resind Industria e Comercio Ltda.	BRAZIL	Conformant
Tin	CID001539	Rui Da Hung	TAIWAN	Conformant
Tin	CID000295	Smelter not listed	MALAYSIA	Known
Tin	CID000345	Smelter not listed	BRAZIL	Known
Tin	CID001143	Smelter not listed	BELGIUM	Known
Tin	CID001449	Smelter not listed	CHINA	Known
Tin	CID002571	Smelter not listed	CHINA	Known
Tin	CID002696	Smelter not listed	CHINA	Known
Tin	CID002825	Smelter not listed	CHINA	Known
Tin	C0000 0049	Smelter not listed	BRAZIL	Known
Tin	CID001758	Soft Metais Ltda.	BRAZIL	Conformant
Tin	CID002756	Super Ligas	BRAZIL	Known
Tin	CID002834	Thai Nguyen Mining and Metallurgy Co., Ltd.	VIETNAM	Conformant
Tin	CID001898	Thaisarco	THAILAND	Conformant
Tin	CID003325	Tin Technology & Refining	UNITED STATES OF	Conformant
TD:	CIDOOSEE		AMERICA	**
Tin	CID002574	Tuyen Quang Non-Ferrous Metals Joint Stock Company	VIETNAM	Known
Tin	CID002011	Vietnam Youngsun Tungsten Industry Co., Ltd.	JAPAN	Known
Tin	CID002036	White Solder Metalurgia e Mineracao Ltda.	BRAZIL	Conformant
Tin	CID002158	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA	Conformant
Tin	CID002180	Yunnan Tin Company Limited	CHINA	Conformant
Tin	CID003397	Yunnan Yunfan Non-ferrous Metals Co., Ltd.	CHINA	Conformant
Tungsten	CID000004	A.L.M.T. Corp.	JAPAN	Conformant
Tungsten	CID002833	ACL Metais Eireli	BRAZIL	Conformant
Tungsten	CID002513	Chenzhou Diamond Tungsten Products Co., Ltd.	CHINA	Conformant
Tungsten	CID002641	China Molybdenum Tungsten Co., Ltd.	CHINA	Known
Tungsten	CID000258	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA	Conformant
Tungsten	CID000281	CNMC (Guangxi) PGMA Co., Ltd.	CHINA	Known
Tungsten	CID003401	Fujian Ganmin RareMetal Co., Ltd.	CHINA	Conformant
Tungsten	CID000499	Fujian Jinxin Tungsten Co., Ltd.	CHINA	Conformant
Tungsten	CID002645	Ganzhou Haichuang Tungsten Co., Ltd.	CHINA	Conformant
Tungsten	CID000875	Ganzhou Huaxing Tungsten Products Co., Ltd.	CHINA	Conformant

Mumber   Smelter Name   Smelter Country   Smelter Country   Smelter Country   Conformant		Smelter Identification			
Tungsten   CID002694   Ganzhou Seadragon W & Mo Co., Ltd.	Metal	Number	Smelter Name	Smelter Country	Smelter Status
Tungsten					
Tungsten	Tungsten	CID002494	Ganzhou Seadragon W & Mo Co., Ltd.		Conformant
Tungsten	Tungsten	CID000568	Global Tungsten & Powders Corp.		Conformant
Tungsten	Tungsten	CID000218	Guangdong Xianglu Tungsten Co., Ltd.	CHINA	Conformant
Tungsten	Tungsten	CID002542	H.C. Starck Smelting GmbH & Co. KG	GERMANY	Conformant
Tungsten					
Tungsten	Tungsten		9 ,		
Tungsten CID003182 Hunan Litian Tungsten Industry Co., Ltd. CHINA Conformant Tungsten CID000649 Hydrometallurg, JSC RUSSIAN FEDERATION Conformant Tungsten CID0006251 Japan New Metals Co., Ltd. JAPAN Conformant Tungsten CID002551 Japan New Metals Co., Ltd. CHINA Conformant Tungsten CID002551 Jiangwu H.C. Starck Tungsten Products Co., Ltd. CHINA Conformant Tungsten CID002551 Jiangwu H.C. Starck Tungsten Products Co., Ltd. CHINA Active Tungsten CID002313 Jiangwa Dayu Longxintal Tungsten Co., Ltd. CHINA Conformant Tungsten CID002313 Jiangwa Minmetals Gao'an Non-ferrous Metals Co., Ltd. CHINA Known Tungsten CID002318 Jiangwa Minmetals Gao'an Non-ferrous Metals Co., Ltd. CHINA Conformant Tungsten CID002316 Jiangwa Tonggu Non-ferrous Metalsurgical & Chemical Co., Ltd. CHINA Conformant Tungsten CID002316 Jiangwa Yaosheng Tungsten Industry Co., Ltd. CHINA Conformant Tungsten CID002316 Jiangwa Yaosheng Tungsten Co., Ltd. CHINA Conformant Tungsten CID003408 JSC "Kirovgrad Hard Alloys Plant" RUSSIAN FEDERATION Active Tungsten CID003408 JSC "Kirovgrad Hard Alloys Plant" RUSSIAN FEDERATION Active Tungsten CID003408 Kennametal Fallon AMERICA Conformant Tungsten CID003408 Rennametal Huntsville Makerica Cundout Makerica Conformant Tungsten CID003408 Rennametal Huntsville AMERICA Conformant Tungsten CID003409 Lianyou Metals Co., Ltd. KOREA, REPUBLIC OF Conformant Tungsten CID003407 Lianyou Metals Co., Ltd. CHINA Conformant Tungsten CID002343 Maian Tungsten Chemical LLC (MTC) VIETNAM Conformant Tungsten CID002543 Maian Tungsten Chemical LLC (MTC) VIETNAM Conformant Tungsten CID002543 Maian Tungsten Chemical LLC (MTC) VIETNAM Conformant Tungsten CID002545 Moliner Ltd. RUSSIAN FEDERATION Conformant Tungsten CID002845 Moliner Ltd. Chungwa Makerial Co., Inc. Philippine Chuangwin Industrial Co., Inc. Philippine Chuangwin Industrial Co., Inc. Philippine Chuangwin Tungsten CID002724 Uncecha Refractory metals plant RUSSIAN FEDERATION Conformant Tungsten CID002724 Uncecha Refractory metals plant RUSSIAN FEDERATION Conformant Tungsten CID0					
Tungsten CID002649 Hydrometallurg, JSC RUSSIAN FEDERATION Conformant Tungsten CID000825 Japan New Metals Co., Ltd. JAPAN Conformant Tungsten CID002513 Jangwu H.C. Starck Tungsten Products Co., Ltd. CHINA Conformant Tungsten CID002647 Jiangwu H.C. Starck Tungsten Co., Ltd. CHINA Active Tungsten CID002647 Jiangwi Dayu Longsten Co., Ltd. CHINA Conformant Tungsten CID002313 Jiangwi Gan Bei Tungsten Co., Ltd. CHINA Conformant Tungsten CID002313 Jiangwi Gan Bei Tungsten Co., Ltd. CHINA Conformant Tungsten CID002313 Jiangwi Gan Bei Tungsten Co., Ltd. CHINA Conformant Tungsten CID002318 Jiangwi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. CHINA Conformant Tungsten CID002316 Jiangwi Yaosheng Tungsten Industry Co., Ltd. CHINA Conformant Tungsten CID002316 Jiangwi Yaosheng Tungsten Co., Ltd. CHINA Conformant Tungsten CID002316 Jiangwi Yaosheng Tungsten Co., Ltd. CHINA Conformant Tungsten CID003408 JSC "Kirovgrad Hard Alloys Plant" RUSSIAN FEDERATION Active Tungsten CID003408 JSC "Kirovgrad Hard Alloys Plant" RUSSIAN FEDERATION Active Tungsten CID003408 Kennametal Huntsville UNITED STATES OF AMERICA Conformant Tungsten CID003408 Kennametal Huntsville UNITED STATES OF AMERICA Conformant Tungsten CID003407 Lianyou Metals Co., Ltd. TAIWAN Conformant Tungsten CID003407 Lianyou Metals Co., Ltd. TAIWAN Conformant Tungsten CID002319 Malipo Haiyu Tungsten Co., Ltd. CHINA Conformant Tungsten CID002431 Masan Tungsten Chemical LLC (MTC) VIETNAM Conformant Tungsten CID002543 Masan Tungsten Chemical LLC (MTC) VIETNAM Conformant Tungsten CID002649 Niagara Refining LLC UNITED STATES OF AMERICA Conformant Tungsten CID002649 Niagara Refining LLC UNITED STATES OF AMERICA Conformant Tungsten CID002842 Philippine Chuangwin Industrial Co., Inc. PHILIPPINES Conformant CID002842 Unecha Refractory metals plant RUSSIAN FEDERATION Conformant Tungsten CID002843 Wolfech Korea Co., Ltd. VIETNAM Conformant RUSSIAN FEDERATION Conformant Tungsten CID002843 Wolfech Korea Co., Ltd. KOREA, REPUBLIC OF Conformant Tungsten CID002843 Wolfech Korea Co.	Tungsten	CID000769	Hunan Chunchang Nonferrous Metals Co., Ltd.	CHINA	Conformant
Tungsten CID000825 Japan New Metals Co., Ltd. JAPAN Conformant Tungsten CID002551 Jangwu H.C. Starck Tungsten Products Co., Ltd. CHINA Conformant Tungsten CID002551 Jangwu H.C. Starck Tungsten Products Co., Ltd. CHINA Active Tungsten CID002321 Jangxi Gan Bei Tungsten Co., Ltd. CHINA Active Tungsten CID002321 Jangxi Gan Bei Tungsten Co., Ltd. CHINA Conformant Tungsten CID002313 Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. CHINA Known Tungsten CID002317 Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. CHINA Conformant Tungsten CID002317 Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. CHINA Conformant Tungsten CID002317 Jiangxi Xinsheng Tungsten Industry Co., Ltd. CHINA Conformant Tungsten CID002316 Jiangxi Yaosheng Tungsten Loc, Ltd. CHINA Conformant Tungsten CID003408 JSC "Kirovgrad Hard Alloys Plant" RUSSIAN FEDERATION Active Tungsten CID003408 JSC "Kirovgrad Hard Alloys Plant" RUSSIAN FEDERATION Active Tungsten CID003408 Kennametal Fallon UNITED STATES OF AMERICA UNITED STATES OF AMERICA UNITED STATES OF AMERICA UNITED STATES OF AMERICA Conformant Tungsten CID003407 Kennametal Huntsville UNITED STATES OF AMERICA Conformant Tungsten CID003407 Lianyou Metals Co., Ltd. TAIWAN Conformant Tungsten CID003407 Majon Haiyu Tungsten Co., Ltd. TAIWAN Conformant Tungsten CID00243 Masan Tungsten Chemical LLC (MTC) VIETNAM Conformant Tungsten CID00245 Moliren Ltd. RUSSIAN FEDERATION Conformant Tungsten CID002543 Moliren Ltd. RUSSIAN FEDERATION Conformant Tungsten CID002645 Moliren Ltd. RUSSIAN FEDERATION Conformant Tungsten CID002645 Moliren Ltd. RUSSIAN FEDERATION Conformant Tungsten CID002647 Philippine Chuangxin Industrial Co., Inc. PHILIPPINES Conformant Tungsten CID002649 Volfram Bergbau und Hutten AG AUSTRIA Conformant Tungsten CID002643 Wolfera Bergbau und Hutten AG AUSTRIA Conformant Tungsten CID002643 Wolfera Bergbau und Hutten AG AUSTRIA Conformant Tungsten CID002640 Xiamen Tungsten Co., Ltd. CHINA Conformant Tungsten CID002680 Xiamen Tungsten Co., Ltd. CHINA Conformant Tungsten CID002680 Xiame	Tungsten	CID003182	Hunan Litian Tungsten Industry Co., Ltd.	CHINA	Conformant
Tungsten CID002551 Jiangwu H.C. Starck Tungsten Products Co., Ltd. CHINA Active Tungsten CID002647 Jiangxi Dayu Longxintai Tungsten Co., Ltd. CHINA Active Tungsten CID002313 Jiangxi Gan Bei Tungsten Co., Ltd. CHINA Conformant Tungsten CID002313 Jiangxi Gan Bei Tungsten Co., Ltd. CHINA Known Tungsten CID002313 Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. CHINA Conformant Tungsten CID002316 Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. CHINA Conformant Tungsten CID002317 Jiangxi Xinsheng Tungsten Industry Co., Ltd. CHINA Conformant Tungsten CID002316 Jiangxi Xinsheng Tungsten Ldd. CHINA Conformant Tungsten CID002316 Jiangxi Xinsheng Tungsten Co., Ltd. CHINA Conformant Tungsten CID003408 JSC "Kirovgrad Hard Alloys Plant" RUSSIAN FEDERATION Active  Tungsten CID003408 JSC "Kirovgrad Hard Alloys Plant" RUSSIAN FEDERATION Active  Tungsten CID000366 Kennametal Fallon AMERICA  Tungsten CID003388 KGETS Co., Ltd. UNITED STATES OF AMERICA  Tungsten CID003388 KGETS Co., Ltd. KOREA, REPUBLIC OF Conformant Tungsten CID003407 Lianyou Metals Co., Ltd. TAIWAN Conformant Tungsten CID002543 Masan Tungsten Co., Ltd. CHINA Conformant Tungsten CID002543 Masan Tungsten Chemical LLC (MTC) VIETNAM Conformant Tungsten CID002549 Noline Ltd. RUSSIAN FEDERATION Conformant Tungsten CID002589 Niagara Refining LLC  Tungsten CID002589 Niagara Refining LLC  Tungsten CID00267 Philippine Chuangxin Industrial Co., Inc.  Tungsten CID00274 Unecha Refractory metals plant Tungsten CID00274 Unecha Refractory metals plant Tungsten CID002044 Wolfram Bergbau und Hutten AG Tungsten CID002040 Wolfram Bergbau und Hutten AG Tungsten CID002080 Xiamen Tungsten Co., Ltd. CHINA Conformant Tungsten CID002081 Xiamen Tungsten Ch., Ltd. CHINA Conformant Tungsten CID002082 Xiamen Tungsten Co., Ltd. CHINA Conformant Tungsten CID002083 Xiamen Tungsten Co., Ltd. CH	Tungsten	CID002649	Hydrometallurg, JSC	RUSSIAN FEDERATION	Conformant
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Tungsten     CID002082     Xiamen Tungsten Co., Ltd.     CHINA     Conformant       Tungsten     CID002830     Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.     CHINA     Conformant	Tungsten	CID002843		KOREA, REPUBLIC OF	Conformant
Tungsten     CID002082     Xiamen Tungsten Co., Ltd.     CHINA     Conformant       Tungsten     CID002830     Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.     CHINA     Conformant	Tungsten	CID002320	Xiamen Tungsten (H.C.) Co., Ltd.	CHINA	Conformant
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	Tungsten	CID002095		CHINA	Conformant