
United States
Securities and Exchange Commission
Washington, D.C. 20549

FORM SD

SPECIALIZED DISCLOSURE REPORT

Colfax Corporation
(Exact name of registrant as specified in its charter)

Delaware
(State or other jurisdiction
of incorporation or organization)

001-34045
(Commission
File Number)

54-1887631
(IRS Employer
Identification No.)

420 National Business Parkway, 5th Floor
Annapolis Junction, Maryland
(Address of principal executive offices)

20701
(Zip Code)

Bradley J. Tandy, Senior Vice President and General Counsel
(301) 323-9000
(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

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

Item 1.02 Exhibit

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

Section 2—Exhibits Item 2.01 Exhibits

Exhibit 1.01 – Conflict Minerals Report for the calendar year ended December 31, 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.

COLFAX CORPORATION

Date: May 29, 2020

By: /s/ Jason MacLean

Name: Jason MacLean

Title: Senior Vice President, Colfax Business System and Supply Chain

EXHIBIT INDEX

| <u>Exhibit</u> | <u>Description</u> |
|----------------|--|
| 1.01 | Conflict Minerals Report for the calendar year ended December 31, 2019 |

Conflict Minerals Report

Colfax Corporation has included this Conflict Minerals Report as an exhibit to its Form SD for the period from January 1st 2019 to December 31st 2019 as provided for in Rule 13p-1 under the Securities Exchange Act of 1934, as amended, and Form SD (collectively, the “Conflict Minerals Rule”). The date of filing of this Conflict Minerals Report is May 29, 2020.

Unless the context indicates otherwise, the terms “Colfax,” “we,” “its,” “us,” and “our” refer to Colfax Corporation and its consolidated subsidiaries. As used herein, “Conflict Minerals” or “3TG” is defined as, consistent with the Conflict Minerals Rule, cassiterite, columbite-tantalite (coltan), gold, wolframite and the derivatives tin, tantalum and tungsten.

Forward-Looking Statements

This document contains forward-looking statements within the meaning of the federal securities laws. Any statements that do not relate to historical or current facts or matters are forward-looking statements. You can identify some of the forward-looking statements by the use of forward-looking words, such as “intend” and the like, or the use of future tense. Statements concerning current conditions may also be forward-looking if they imply a continuation of current conditions. Examples of forward-looking statements include, but are not limited to, statements concerning the additional steps that we intend to take to mitigate the risk that our necessary 3TG benefit armed groups.

Forward-looking statements are subject to risks and uncertainties that could cause actual actions or performance to differ materially from those expressed in the forward-looking statements. These risks and uncertainties include, but are not limited to, (1) the continued implementation of satisfactory traceability and other compliance measures by our direct and indirect suppliers on a timely basis or at all, (2) whether smelters and refiners and other market participants responsibly source 3TG, and (3) political, regulatory and economic developments, whether in the Democratic Republic of the Congo (“DRC”) region (the “Covered Countries”), the United States or elsewhere. You are cautioned not to place undue reliance on these forward-looking statements, which speak only as of the date of filing of this document. We do not intend, and undertake no obligation, to publish revised forward-looking statements to reflect events or circumstances after the date of filing of this document or to reflect the occurrence of unanticipated events.

Company and Product Information

Colfax Corporation is a leading diversified technology company that provides fabrication technology and medical technology products and services to customers around the world principally under the ESAB and DJO brands..

Our in-scope product categories for our ESAB and DJO brands for 2019 were: (1) orthopedic devices; (2) gas- and air-handling products; and (3) welding equipment, cutting equipment and automated welding and cutting systems. We have not included information on our former Howden brand, which we divested in 2019, in this Conflict Minerals Report. For a further discussion of our products, see our Annual Report on Form 10-K for the year ended December 31, 2019. The information contained in our Form 10-K and other external materials referenced herein, including our website, is not incorporated by reference into this Conflict Minerals Report or our Form SD and should not be considered part of this Conflict Minerals Report or the Form SD.

Applicability of the Conflict Minerals Rule to Our Company

We are subject to the Conflict Minerals Rule because some of the products that we manufacture contain 3TG that are necessary to their functionality or production. Our in-scope products contain tin, tantalum, tungsten and gold, although each in-scope product does not contain all four 3TG.

We generally do not source 3TG from smelters or refiners and have no direct relationships with mines, and we believe that we are in most cases many levels removed from all of these market participants. However, through the efforts described in this Conflict Minerals Report, we seek to ensure that our sourcing practices are consistent with our Conflict Minerals Policy, which is described below, and encourage conflict free sourcing in our supply chain.

Product, smelter and refiner information in respect of 2019 is described under “Product Information” below and on [Annex A](#). For 2019, each of our in-scope products contained 3TG content for which we were unable to determine the origin. None of the necessary 3TG contained in our in-scope products were determined by us to directly or indirectly finance or benefit armed groups in the DRC or an adjoining country. However, we did not conclude that any of our products were “DRC conflict free.” The terms “adjoining country,” “armed group” and “DRC conflict free” have the meanings contained in the Conflict Minerals Rule.

Our Conflict Minerals Policy

We are committed to being a responsible corporate citizen and are opposed to human rights abuses such as are occurring in the DRC. To this end, we have adopted and communicated to our suppliers and the public a company policy (the “Conflict Minerals Policy”) for the supply chain of 3TG.

The Conflict Minerals Policy includes, but is not limited to, our expectations that:

1. The components, parts and products supplied to us are DRC conflict free within the meaning of the Conflict Minerals Rule;
2. Our suppliers define, implement and communicate to sub-suppliers their own 3TG policy consistent with our Conflict Minerals Policy and the Organisation for Economic Co-operation and Development’s Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High-Risk Areas (the “OECD Guidance”); and
3. Our suppliers implement policies, procedures and frameworks that are consistent with the OECD Guidance and require their direct and indirect sub- suppliers to do the same, and that our suppliers otherwise work with sub-suppliers to ensure traceability of 3TG.

We do not embargo sourcing of 3TG from the Covered Countries and encourage our suppliers to continue to source responsibly from the Covered Countries, from sources that do not support conflict.

Our policy is available on our website at <http://ir.colfaxcorp.com/static-files/5f7e2a02-e1de-4317-aa11-f1a284e476c0>.

Reasonable Country of Origin Inquiry Information

As required by the Conflict Minerals Rule, for 2019, we conducted a “reasonable country of origin inquiry” (“RCOI”). For our RCOI, to the extent applicable, we utilized the same processes and procedures as for our due diligence, in particular Steps 1 and 2 of the OECD Guidance, which are discussed below.

Our inquiry included approximately 7,750 suppliers (the “Suppliers”) that we identified as having provided us with components, parts or products that contain 3TG or that we believe may have provided us with components, parts or products that contain 3TG. For 2019, the Suppliers identified to us 302 smelters and refiners that processed or may have processed the necessary 3TG contained in our in-scope products, as shown and described under Annex A below. These smelters and refiners include 237 smelters and refiners identified as “Conformant” and 6 identified as “Active,” each as defined in Annex A. This information is based primarily on company-level declarations from Suppliers. Accordingly, many of these smelters and refiners may not be part of our supply chain, as we generally were not able to collect data at the product-level.

Based on the results of our RCOI, we conducted due diligence for 2019. These due diligence efforts are discussed below.

Due Diligence Program

Design Framework

We designed our due diligence measures relating to 3TG to conform with, in all material respects, the criteria set forth in the OECD Guidance, Third Edition, including the related Supplements for tin, tantalum and tungsten and for gold (hereinafter referred to as the “OECD Guidance”).

Selected Elements of our Due Diligence Program

The OECD Guidance has established a five-step framework for due diligence as a basis for responsible global supply chain management of minerals from conflict- affected and high-risk areas. Selected elements of our due diligence program are discussed below. However, these are not all of the elements of the program that we have put in place to help ensure that the 3TG contained in our in-scope products are responsibly sourced. The headings below conform to the headings used in the OECD Guidance for each of the five steps.

1. OECD Guidance Step One: “Establish strong company management systems”
 - a. We have a Conflict Minerals Policy. We communicate the policy internally to our sourcing teams and to selected suppliers. The Conflict Minerals Policy also is posted on our website at <http://ir.colfaxcorp.com/static-files/5f7e2a02-e1de-4317-aa11-f1a284e476c0>.

- b. We have a team of senior staff under the Senior Vice President, Colfax Business System (“CBS”) and Supply Chain and Senior Vice President and General Counsel charged with managing our 3TG compliance strategy. The working group also includes representatives from each business platform. We supplement our compliance efforts with specialist outside counsel.
- c. Selected internal personnel are educated on the Conflict Minerals Rule, the OECD Guidance, our compliance plan and the procedures for reviewing and validating supplier responses to our inquiries.
- d. We utilize the Conflict Minerals Reporting Template (the “CMRT”) developed by the Responsible Minerals Initiative (the “RMI”) to identify smelters and refiners in our supply chain. The CMRT requests suppliers to provide information concerning the usage and source of 3TG in their products, as well as information concerning their related compliance efforts. We utilize a third-party service provider (the “Service Provider”) to conduct our supplier outreach and follow-up, as well as for the review and validation of supplier responses.
- e. We maintain business records relating to 3TG due diligence, including records of due diligence processes, findings and resulting decisions, for at least five years.
- f. The Service Provider provides training and educational materials to suppliers to enhance the quality of responses.
- g. We have contractual terms relating to 3TG, which are incorporated into selected supplier contracts.
- h. We have a mechanism for employees, suppliers and other interested parties to report violations of our Conflict Minerals Policy. The contact information for our grievance mechanism is www.colfaxcorp.ethicspoint.com.

2. *OECD Guidance Step Two: “Identify and assess risk in the supply chain”*

- a. We requested in writing, through the Service Provider, that the Suppliers provide us with a completed CMRT. The Service Provider followed up by email or phone on our behalf with Suppliers that did not respond to the request within the specified time frame. The Service Provider followed up at least three times with non-responsive Suppliers.
- b. The Service Provider, on our behalf, reviewed Supplier responses against its written review criteria to identify incomplete responses, potential errors and inaccuracies in the CMRTs. The Service Provider followed up by email with Suppliers that submitted a response that triggered specific quality issues relating to completeness and accuracy.
- c. Smelter and refiner information provided by Suppliers was reviewed by the Service Provider against the RMI’s list of known smelters and refiners. To the extent that a smelter or refiner identified by a Supplier is not on that list, the Service Provider may take additional steps to attempt to determine whether the listed entity is a smelter or refiner. Smelter and refiner information also was reviewed against the lists of Conformant and Active smelters and refiners published by the RMI. 237 of the identified smelters and refiners were listed as Conformant by the RMI and 6 were listed as Active, as of May 15, 2020. Please see Annex A below for further information regarding the smelters and refiners identified to us through our RCOI and due diligence.

The Service Provider bases its country of origin determinations on publicly available information, its outreach to smelters and refiners and information provided by suppliers in their completed CMRTs. Consistent with the foregoing, to the extent that a smelter or refiner identified by a Supplier was not listed as Conformant by the RMI, the Service Provider undertook an additional review to attempt to determine whether that smelter or refiner obtained 3TG from sources that directly or indirectly financed or benefitted armed groups in the Covered Countries.

The Service Provider attempted to reach out to the smelter or refiner directly and conducted research to gain more information about the smelter’s or refiner’s sourcing practices, including the countries of origin of the minerals that it processes, the transit and transfer of the minerals that it processes and whether it has in place internal due diligence procedures or other processes to track the chain-of-custody of its 3TG.

- d. The Service Provider evaluated Suppliers' due diligence processes and policies based on the Suppliers' responses to certain of the questions in the CMRT. These questions ask suppliers about their internal processes regarding 3TG.
- e. We take steps to gather additional information from suppliers whose responses lead us to believe additional information is warranted to help ensure that our supply chain is responsibly sourcing 3TG. This may include requesting product-specific CMRTs or other information.

3. OECD Guidance Step Three: "Design and implement a strategy to respond to identified risks"

- a. Our 3TG compliance team reviewed the reports and evaluations prepared by the Service Provider and liaised with appropriate members of senior management in our legal and supply chain teams, including our Senior Vice President, CBS and Supply Chain and Senior Vice President and General Counsel, regarding the results of our diligence.
- b. We undertake additional internal reviews with our legal and supply chain teams on a periodic basis using the information provided by the Service Provider, our suppliers and our independent inquiries, and respond via supplier follow-up, commercial escalation or other commensurate means to the risks identified via these reviews.

4. OECD Guidance Step Four: "Carry out independent third-party audit of supply chain due diligence at identified points in the supply chain"

In connection with our due diligence, we utilize and rely on information made available by the RMI concerning independent third-party audits of smelters and refiners to assess smelter and refiner due diligence.

5. OECD Guidance Step Five: "Report on supply chain due diligence"

We file a Form SD and Conflict Minerals Report with the Securities and Exchange Commission and make these filings available on our website at <http://ir.colfaxcorp.com/investor-relations>.

Identified Smelters and Refiners

In connection with our RCOI or due diligence, as applicable, the Suppliers identified to us the smelters and refiners listed on Annex A below either as part of our supply chain or as potentially having processed the necessary 3TG contained in our in-scope products in 2019. Due to our position in the supply chain, which is discussed earlier in this Conflict Minerals Report, we rely on our suppliers for accurate smelter and refiner information and our due diligence measures do not provide absolute certainty regarding the source and chain of custody of the necessary 3TG contained in our in-scope products.

We endeavored to determine the mine or location of origin of the 3TG contained in our in-scope products by requesting that the Suppliers provide us or our Service Provider with a completed CMRT, and through the other activities described herein that were taken by us or the Service Provider.

Future Risk Mitigation Efforts

We intend to take the following additional steps to mitigate the risk that the necessary 3TG in our in-scope products benefit armed groups in the Covered Countries. These steps are in addition to the steps that we took in respect of 2019, which we intend to continue to take in respect of 2020 to the extent applicable.

- 1. Engage with applicable Suppliers that provided incomplete responses or that did not provide responses for 2019 to help ensure that they provide requested information for 2019.
 - Engage in additional outreach to Suppliers with non-Conformant responses
 - Conduct further training for Suppliers
 - Work to identify improved contacts for non-respondents

2. Encourage the continuing development and progress of traceability measures at Suppliers that indicated for 2019 that the source of 3TG was unknown or undeterminable.
3. Continue communicating to suppliers our sourcing expectations, including through the dissemination of the Conflict Minerals Policy to them and required adherence to contractual sourcing requirements.

Annex A

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

Smelters and Refiners

In connection with our RCOI or due diligence, as applicable, the Suppliers identified to us the smelters and refiners listed below as either being part of our supply chain or as potentially having processed the necessary 3TG contained in our in-scope products in 2019. Please see the notes that accompany the tables for additional information concerning the information in the tables.

Summary Smelter and Refiner Information

| Metal | Conformant | Active | On Smelter Look-up Tab Only | Total |
|----------|------------|--------|--------------------------------|-------|
| Tantalum | 38 | 0 | 0 | 38 |
| Tin | 48 | 0 | 10 | 58 |
| Tungsten | 43 | 5 | 3 | 51 |
| Gold | 108 | 1 | 46 | 155 |
| Totals | 237 | 6 | 59 | 302 |

The following percentages of the identified smelters and refiners were listed as Conformant, by mineral: tantalum – 100%; tin – 83%; tungsten – 84%; and gold – 70%.

Smelter and Refiner Names and Status

| Metal | Standard Smelter Name | Smelter Facility Location | Status |
|-------|---|---------------------------|-----------------------------|
| Gold | 8853 S.p.A. | ITALY | Conformant |
| Gold | Abington Reldan Metals, LLC | UNITED STATES OF AMERICA | On Smelter Look-up Tab Only |
| Gold | Advanced Chemical Company | UNITED STATES OF AMERICA | Conformant |
| Gold | African Gold Refinery | UGANDA | On Smelter Look-up Tab Only |
| Gold | Aida Chemical Industries Co., Ltd. | JAPAN | Conformant |
| Gold | Al Etihad Gold Refinery DMCC | UNITED ARAB EMIRATES | Conformant |
| Gold | Allgemeine Gold-und Silberscheideanstalt A.G. | GERMANY | Conformant |
| Gold | Almalyk Mining and Metallurgical Complex (AMMC) | UZBEKISTAN | Conformant |
| Gold | AngloGold Ashanti Corrego do Sitio Mineracao | BRAZIL | Conformant |
| Gold | Argor-Heraeus S.A. | SWITZERLAND | Conformant |
| Gold | Asahi Pretec Corp. | JAPAN | Conformant |
| Gold | Asahi Refining Canada Ltd. | CANADA | Conformant |
| Gold | Asahi Refining USA Inc. | UNITED STATES OF AMERICA | Conformant |
| Gold | Asaka Riken Co., Ltd. | JAPAN | Conformant |
| Gold | Atasay Kuyumculuk Sanayi Ve Ticaret A.S. | TURKEY | Conformant |

| | | | |
|------|---|--------------------------|-----------------------------|
| Gold | AU Traders and Refiners | SOUTH AFRICA | Conformant |
| Gold | Aurubis AG | GERMANY | Conformant |
| Gold | Bangalore Refinery | INDIA | Conformant |
| Gold | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | PHILIPPINES | Conformant |
| Gold | Boliden AB | SWEDEN | Conformant |
| Gold | C. Hafner GmbH + Co. KG | GERMANY | Conformant |
| Gold | Caridad | MEXICO | On Smelter Look-up Tab Only |
| Gold | CCR Refinery—Glencore Canada Corporation | CANADA | Conformant |
| Gold | Cendres + Metaux S.A. | SWITZERLAND | Conformant |
| Gold | CGR Metalloys Pvt Ltd. | INDIA | On Smelter Look-up Tab Only |
| Gold | Chimet S.p.A. | ITALY | Conformant |
| Gold | Chugai Mining | JAPAN | Conformant |
| Gold | Daye Non-Ferrous Metals Mining Ltd. | CHINA | On Smelter Look-up Tab Only |
| Gold | Degussa Sonne / Mond Goldhandel GmbH | GERMANY | On Smelter Look-up Tab Only |
| Gold | Dijllah Gold Refinery FZC | UNITED ARAB EMIRATES | On Smelter Look-up Tab Only |
| Gold | DODUCO Contacts and Refining GmbH | GERMANY | Conformant |
| Gold | Dowa | JAPAN | Conformant |
| Gold | DS PRETECH Co., Ltd. | KOREA, REPUBLIC OF | Conformant |
| Gold | DSC (Do Sung Corporation) | KOREA, REPUBLIC OF | Conformant |
| Gold | Eco-System Recycling Co., Ltd. East Plant | JAPAN | Conformant |
| Gold | Eco-System Recycling Co., Ltd. North Plant | JAPAN | Conformant |
| Gold | Eco-System Recycling Co., Ltd. West Plant | JAPAN | Conformant |
| Gold | Emirates Gold DMCC | UNITED ARAB EMIRATES | Conformant |
| Gold | Fidelity Printers and Refiners Ltd. | ZIMBABWE | On Smelter Look-up Tab Only |
| Gold | Fujairah Gold FZC | UNITED ARAB EMIRATES | On Smelter Look-up Tab Only |
| Gold | GCC Gujrat Gold Centre Pvt. Ltd. | INDIA | On Smelter Look-up Tab Only |
| Gold | Geib Refining Corporation | UNITED STATES OF AMERICA | Conformant |
| Gold | Gold Refinery of Zijin Mining Group Co., Ltd. | CHINA | Conformant |
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM | CHINA | On Smelter Look-up Tab Only |
| Gold | Guangdong Jinding Gold Limited | CHINA | On Smelter Look-up Tab Only |
| Gold | Guoda Safina High-Tech Environmental Refinery Co., Ltd. | CHINA | On Smelter Look-up Tab Only |
| Gold | Hangzhou Fuchunjiang Smelting Co., Ltd. | CHINA | On Smelter Look-up Tab Only |

| | | | |
|------|---|--------------------------|-----------------------------|
| Gold | Heimerle + Meule GmbH | GERMANY | Conformant |
| Gold | Heraeus Metals Hong Kong Ltd. | CHINA | Conformant |
| Gold | Heraeus Precious Metals GmbH & Co. KG | GERMANY | Conformant |
| Gold | Hunan Chenzhou Mining Co., Ltd. | CHINA | On Smelter Look-up Tab Only |
| Gold | Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd. | CHINA | On Smelter Look-up Tab Only |
| Gold | HwaSeong CJ CO., LTD. | KOREA, REPUBLIC OF | On Smelter Look-up Tab Only |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | CHINA | Conformant |
| Gold | International Precious Metal Refiners | UNITED ARAB EMIRATES | On Smelter Look-up Tab Only |
| Gold | Ishifuku Metal Industry Co., Ltd. | JAPAN | Conformant |
| Gold | Istanbul Gold Refinery | TURKEY | Conformant |
| Gold | Italpreziosi | ITALY | Conformant |
| Gold | Japan Mint | JAPAN | Conformant |
| Gold | Jiangxi Copper Co., Ltd. | CHINA | Conformant |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant | RUSSIAN FEDERATION | On Smelter Look-up Tab Only |
| Gold | JSC Uralelectromed | RUSSIAN FEDERATION | Conformant |
| Gold | JX Nippon Mining & Metals Co., Ltd. | JAPAN | Conformant |
| Gold | Kaloti Precious Metals | UNITED ARAB EMIRATES | On Smelter Look-up Tab Only |
| Gold | Kazakhmys Smelting LLC | KAZAKHSTAN | On Smelter Look-up Tab Only |
| Gold | Kazzinc | KAZAKHSTAN | Conformant |
| Gold | Kennecott Utah Copper LLC | UNITED STATES OF AMERICA | Conformant |
| Gold | KGHM Polska Miedz Spolka Akcyjna | POLAND | Conformant |
| Gold | Kojima Chemicals Co., Ltd. | JAPAN | Conformant |
| Gold | Korea Zinc Co., Ltd. | KOREA, REPUBLIC OF | Conformant |
| Gold | Kyrgyzaltyn JSC | KYRGYZSTAN | Conformant |
| Gold | Kyshtym Copper-Electrolytic Plant ZAO | RUSSIAN FEDERATION | On Smelter Look-up Tab Only |
| Gold | L'azurde Company For Jewelry | SAUDI ARABIA | On Smelter Look-up Tab Only |
| Gold | Lingbao Gold Co., Ltd. | CHINA | On Smelter Look-up Tab Only |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd. | CHINA | On Smelter Look-up Tab Only |
| Gold | L'Orfebre S.A. | ANDORRA | Conformant |
| Gold | LS-NIKKO Copper Inc. | KOREA, REPUBLIC OF | Conformant |
| Gold | LT Metal Ltd. | KOREA, REPUBLIC OF | Conformant |
| Gold | Luoyang Zijin Yinhui Gold Refinery Co., Ltd. | CHINA | On Smelter Look-up Tab Only |

| | | | |
|------|---|--------------------------|-----------------------------|
| Gold | Marsam Metals | BRAZIL | Conformant |
| Gold | Materion | UNITED STATES OF AMERICA | Conformant |
| Gold | Matsuda Sangyo Co., Ltd. | JAPAN | Conformant |
| Gold | Metalor Technologies (Hong Kong) Ltd. | CHINA | Conformant |
| Gold | Metalor Technologies (Singapore) Pte., Ltd. | SINGAPORE | Conformant |
| Gold | Metalor Technologies (Suzhou) Ltd. | CHINA | Conformant |
| Gold | Metalor Technologies S.A. | SWITZERLAND | Conformant |
| Gold | Metalor USA Refining Corporation | UNITED STATES OF AMERICA | Conformant |
| Gold | Metalurgica Met-Mex Penoles S.A. De C.V. | MEXICO | Conformant |
| Gold | Mitsubishi Materials Corporation | JAPAN | Conformant |
| Gold | Mitsui Mining and Smelting Co., Ltd. | JAPAN | Conformant |
| Gold | MMTC-PAMP India Pvt., Ltd. | INDIA | Conformant |
| Gold | Modeltech Sdn Bhd | MALAYSIA | On Smelter Look-up Tab Only |
| Gold | Morris and Watson | NEW ZEALAND | On Smelter Look-up Tab Only |
| Gold | Moscow Special Alloys Processing Plant | RUSSIAN FEDERATION | Conformant |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.S. | TURKEY | Conformant |
| Gold | Navoi Mining and Metallurgical Combinat | UZBEKISTAN | On Smelter Look-up Tab Only |
| Gold | NH Recytech Company | KOREA, REPUBLIC OF | On Smelter Look-up Tab Only |
| Gold | Nihon Material Co., Ltd. | JAPAN | Conformant |
| Gold | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH | AUSTRIA | Conformant |
| Gold | Ohura Precious Metal Industry Co., Ltd. | JAPAN | Conformant |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | RUSSIAN FEDERATION | Conformant |
| Gold | OJSC Novosibirsk Refinery | RUSSIAN FEDERATION | Conformant |
| Gold | PAMP S.A. | SWITZERLAND | Conformant |
| Gold | Pease & Curren | UNITED STATES OF AMERICA | On Smelter Look-up Tab Only |
| Gold | Penglai Penggang Gold Industry Co., Ltd. | CHINA | On Smelter Look-up Tab Only |
| Gold | Planta Recuperadora de Metales SpA | CHILE | Conformant |
| Gold | Prioksky Plant of Non-Ferrous Metals | RUSSIAN FEDERATION | Conformant |
| Gold | PT Aneka Tambang (Persero) Tbk | INDONESIA | Conformant |
| Gold | PX Precinox S.A. | SWITZERLAND | Conformant |
| Gold | QG Refining, LLC | UNITED STATES OF AMERICA | On Smelter Look-up Tab Only |
| Gold | Rand Refinery (Pty) Ltd. | SOUTH AFRICA | Conformant |
| Gold | Refinery of Seemine Gold Co., Ltd. | CHINA | On Smelter Look-up Tab Only |

| | | | |
|------|--|---------------------------|-----------------------------|
| Gold | REMONDIS PMR B.V. | NETHERLANDS | Conformant |
| Gold | Royal Canadian Mint | CANADA | Conformant |
| Gold | SAAMP | FRANCE | Conformant |
| Gold | Sabin Metal Corp. | UNITED STATES OF AMERICA | On Smelter Look-up Tab Only |
| Gold | Safimet S.p.A | ITALY | Conformant |
| Gold | SAFINA A.S. | CZECH REPUBLIC | Active |
| Gold | Sai Refinery | INDIA | On Smelter Look-up Tab Only |
| Gold | Samduck Precious Metals | KOREA, REPUBLIC OF | Conformant |
| Gold | Samwon Metals Corp. | KOREA, REPUBLIC OF | On Smelter Look-up Tab Only |
| Gold | SAXONIA Edelmetalle GmbH | GERMANY | Conformant |
| Gold | SEMPSA Joyeria Plateria S.A. | SPAIN | Conformant |
| Gold | Shandong Humon Smelting Co., Ltd. | CHINA | On Smelter Look-up Tab Only |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | CHINA | On Smelter Look-up Tab Only |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd. | CHINA | Conformant |
| Gold | Sichuan Tianze Precious Metals Co., Ltd. | CHINA | Conformant |
| Gold | Singway Technology Co., Ltd. | TAIWAN, PROVINCE OF CHINA | Conformant |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals | RUSSIAN FEDERATION | Conformant |
| Gold | Solar Applied Materials Technology Corp. | TAIWAN, PROVINCE OF CHINA | Conformant |
| Gold | Sovereign Metals | INDIA | On Smelter Look-up Tab Only |
| Gold | State Research Institute Center for Physical Sciences and Technology | LITHUANIA | On Smelter Look-up Tab Only |
| Gold | Sudan Gold Refinery | SUDAN | On Smelter Look-up Tab Only |
| Gold | Sumitomo Metal Mining Co., Ltd. | JAPAN | Conformant |
| Gold | SungEel HiMetal Co., Ltd. | KOREA, REPUBLIC OF | Conformant |
| Gold | T.C.A S.p.A | ITALY | Conformant |
| Gold | Tanaka Kikinzoku Kogyo K.K. | JAPAN | Conformant |
| Gold | The Refinery of Shandong Gold Mining Co., Ltd. | CHINA | Conformant |
| Gold | Tokuriki Honten Co., Ltd. | JAPAN | Conformant |
| Gold | Tongling Nonferrous Metals Group Co., Ltd. | CHINA | On Smelter Look-up Tab Only |
| Gold | Tony Goetz NV | BELGIUM | On Smelter Look-up Tab Only |
| Gold | TOO Tau-Ken-Altyn | KAZAKHSTAN | Conformant |
| Gold | Torecom | KOREA, REPUBLIC OF | Conformant |
| Gold | Umicore Brasil Ltda. | BRAZIL | Conformant |
| Gold | Umicore Precious Metals Thailand | THAILAND | Conformant |

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| Gold | Umicore S.A. Business Unit Precious Metals Refining | BELGIUM | Conformant |
| Gold | United Precious Metal Refining, Inc. | UNITED STATES OF AMERICA | Conformant |
| Gold | Valcambi S.A. | SWITZERLAND | Conformant |
| Gold | Western Australian Mint (T/a The Perth Mint) | AUSTRALIA | Conformant |
| Gold | WIELAND Edelmetalle GmbH | GERMANY | Conformant |
| Gold | Yamakin Co., Ltd. | JAPAN | Conformant |
| Gold | Yokohama Metal Co., Ltd. | JAPAN | Conformant |
| Gold | Yunnan Copper Industry Co., Ltd. | CHINA | On Smelter Look-up Tab Only |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | CHINA | Conformant |
| Tantalum | Asaka Riken Co., Ltd. | JAPAN | Conformant |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd. | CHINA | Conformant |
| Tantalum | CP Metals Inc. | UNITED STATES OF AMERICA | Conformant |
| Tantalum | D Block Metals, LLC | UNITED STATES OF AMERICA | Conformant |
| Tantalum | Exotech Inc. | UNITED STATES OF AMERICA | Conformant |
| Tantalum | F&X Electro-Materials Ltd. | CHINA | Conformant |
| Tantalum | FIR Metals & Resource Ltd. | CHINA | Conformant |
| Tantalum | Global Advanced Metals Aizu | JAPAN | Conformant |
| Tantalum | Global Advanced Metals Boyertown | UNITED STATES OF AMERICA | Conformant |
| Tantalum | Guangdong Zhiyuan New Material Co., Ltd. | CHINA | Conformant |
| Tantalum | H.C. Starck Co., Ltd. | THAILAND | Conformant |
| Tantalum | H.C. Starck Hermsdorf GmbH | GERMANY | Conformant |
| Tantalum | H.C. Starck Inc. | UNITED STATES OF AMERICA | Conformant |
| Tantalum | H.C. Starck Ltd. | JAPAN | Conformant |
| Tantalum | H.C. Starck Smelting GmbH & Co. KG | GERMANY | Conformant |
| Tantalum | H.C. Starck Tantalum and Niobium GmbH | GERMANY | Conformant |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd. | CHINA | Conformant |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd. | CHINA | Conformant |
| Tantalum | Jiangxi Tuohong New Raw Material | CHINA | Conformant |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd. | CHINA | Conformant |
| Tantalum | Jiujiang Tanbre Co., Ltd. | CHINA | Conformant |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd. | CHINA | Conformant |
| Tantalum | KEMET Blue Metals | MEXICO | Conformant |
| Tantalum | LSM Brasil S.A. | BRAZIL | Conformant |
| Tantalum | Metallurgical Products India Pvt., Ltd. | INDIA | Conformant |
| Tantalum | Mineracao Taboca S.A. | BRAZIL | Conformant |
| Tantalum | Mitsui Mining and Smelting Co., Ltd. | JAPAN | Conformant |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd. | CHINA | Conformant |
| Tantalum | NPM Silmet AS | ESTONIA | Conformant |

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| Tantalum | PRG Doeel | NORTH MACEDONIA, REPUBLIC OF | Conformant |
| Tantalum | QuantumClean | UNITED STATES OF AMERICA | Conformant |
| Tantalum | Resind Industria e Comercio Ltda. | BRAZIL | Conformant |
| Tantalum | Solikamsk Magnesium Works OAO | RUSSIAN FEDERATION | Conformant |
| Tantalum | Taki Chemical Co., Ltd. | JAPAN | Conformant |
| Tantalum | Telex Metals | UNITED STATES OF AMERICA | Conformant |
| Tantalum | Ulba Metallurgical Plant JSC | KAZAKHSTAN | Conformant |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd. | CHINA | Conformant |
| Tantalum | Yanling Jincheng Tantalum & Niobium Co., Ltd. | CHINA | Conformant |
| Tin | Alpha | UNITED STATES OF AMERICA | Conformant |
| Tin | An Vinh Joint Stock Mineral Processing Company | VIET NAM | On Smelter Look-up Tab Only |
| Tin | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | CHINA | Conformant |
| Tin | Chifeng Dajingzi Tin Industry Co., Ltd. | CHINA | Conformant |
| Tin | China Tin Group Co., Ltd. | CHINA | Conformant |
| Tin | Dongguan CiEXPO Environmental Engineering Co., Ltd. | CHINA | On Smelter Look-up Tab Only |
| Tin | Dowa | JAPAN | Conformant |
| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | VIET NAM | On Smelter Look-up Tab Only |
| Tin | EM Vinto | BOLIVIA (PLURINATIONAL STATE OF) | Conformant |
| Tin | Estanho de Rondonia S.A. | BRAZIL | On Smelter Look-up Tab Only |
| Tin | Fenix Metals | POLAND | Conformant |
| Tin | Gejiu City Fuxiang Industry and Trade Co., Ltd. | CHINA | On Smelter Look-up Tab Only |
| Tin | Gejiu Kai Meng Industry and Trade LLC | CHINA | Conformant |
| Tin | Gejiu Non-Ferrous Metal Processing Co., Ltd. | CHINA | Conformant |
| Tin | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | CHINA | Conformant |
| Tin | Gejiu Zili Mining And Metallurgy Co., Ltd. | CHINA | Conformant |
| Tin | Guangdong Hanhe Non-Ferrous Metal Co., Ltd. | CHINA | Conformant |
| Tin | Guanyang Guida Nonferrous Metal Smelting Plant | CHINA | Conformant |
| Tin | HuiChang Hill Tin Industry Co., Ltd. | CHINA | Conformant |
| Tin | Huichang Jinshunda Tin Co., Ltd. | CHINA | Conformant |
| Tin | Jiangxi New Nanshan Technology Ltd. | CHINA | Conformant |
| Tin | Luna Smelter, Ltd. | RWANDA | Conformant |
| Tin | Ma'anshan Weitai Tin Co., Ltd. | CHINA | Conformant |
| Tin | Magnu's Minerais Metais e Ligas Ltda. | BRAZIL | Conformant |
| Tin | Malaysia Smelting Corporation (MSC) | MALAYSIA | Conformant |
| Tin | Melt Metais e Ligas S.A. | BRAZIL | Conformant |
| Tin | Metallic Resources, Inc. | UNITED STATES OF AMERICA | Conformant |

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| Tin | Metallo Belgium N.V. | BELGIUM | Conformant |
| Tin | Metallo Spain S.L.U. | SPAIN | Conformant |
| Tin | Mineracao Taboca S.A. | BRAZIL | Conformant |
| Tin | Minsur | PERU | Conformant |
| Tin | Mitsubishi Materials Corporation | JAPAN | Conformant |
| Tin | Modeltech Sdn Bhd | MALAYSIA | On Smelter Look-up Tab Only |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company | VIET NAM | On Smelter Look-up Tab Only |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd. | THAILAND | Conformant |
| Tin | O.M. Manufacturing Philippines, Inc. | PHILIPPINES | Conformant |
| Tin | Operaciones Metalurgicas S.A. | BOLIVIA (PLURINATIONAL STATE OF) | Conformant |
| Tin | Pongpipat Company Limited | MYANMAR | On Smelter Look-up Tab Only |
| Tin | Precious Minerals and Smelting Limited | INDIA | Conformant |
| Tin | PT Artha Cipta Langgeng | INDONESIA | Conformant |
| Tin | PT ATD Makmur Mandiri Jaya | INDONESIA | Conformant |
| Tin | PT Menara Cipta Mulia | INDONESIA | Conformant |
| Tin | PT Mitra Stania Prima | INDONESIA | Conformant |
| Tin | PT Refined Bangka Tin | INDONESIA | Conformant |
| Tin | PT Timah Tbk Kundur | INDONESIA | Conformant |
| Tin | PT Timah Tbk Mentok | INDONESIA | Conformant |
| Tin | Resind Industria e Comercio Ltda. | BRAZIL | Conformant |
| Tin | Rui Da Hung | TAIWAN, PROVINCE OF CHINA | Conformant |
| Tin | Soft Metais Ltda. | BRAZIL | Conformant |
| Tin | Super Ligas | BRAZIL | On Smelter Look-up Tab Only |
| Tin | Thai Nguyen Mining and Metallurgy Co., Ltd. | VIET NAM | Conformant |
| Tin | Thaisarco | THAILAND | Conformant |
| Tin | Tin Technology & Refining | UNITED STATES OF AMERICA | Conformant |
| Tin | Tuyen Quang Non-Ferrous Metals Joint Stock Company | VIET NAM | On Smelter Look-up Tab Only |
| Tin | White Solder Metalurgia e Mineracao Ltda. | BRAZIL | Conformant |
| Tin | Yunnan Chengfeng Non-ferrous Metals Co., Ltd. | CHINA | Conformant |
| Tin | Yunnan Tin Company Limited | CHINA | Conformant |
| Tin | Yunnan Yunfan Non-ferrous Metals Co., Ltd. | CHINA | Conformant |
| Tungsten | A.L.M.T. Corp. | JAPAN | Conformant |
| Tungsten | ACL Metais Eireli | BRAZIL | Conformant |
| Tungsten | Albasteel Industria e Comercio de Ligas Para Fundicao Ltd. | BRAZIL | Active |
| Tungsten | Asia Tungsten Products Vietnam Ltd. | VIET NAM | Conformant |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd. | CHINA | Conformant |

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| Tungsten | China Molybdenum Co., Ltd. | CHINA | On Smelter Look-up Tab Only |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd. | CHINA | Conformant |
| Tungsten | CNMC (Guangxi) PGMA Co., Ltd. | CHINA | On Smelter Look-up Tab Only |
| Tungsten | CP Metals Inc. | UNITED STATES OF AMERICA | Active |
| Tungsten | Fujian Ganmin RareMetal Co., Ltd. | CHINA | Conformant |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd. | CHINA | Conformant |
| Tungsten | Ganzhou Haichuang Tungsten Co., Ltd. | CHINA | Conformant |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd. | CHINA | Conformant |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd. | CHINA | Conformant |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd. | CHINA | Conformant |
| Tungsten | Global Tungsten & Powders Corp. | UNITED STATES OF AMERICA | Conformant |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd. | CHINA | Conformant |
| Tungsten | H.C. Starck Smelting GmbH & Co. KG | GERMANY | Conformant |
| Tungsten | H.C. Starck Tungsten GmbH | GERMANY | Conformant |
| Tungsten | Hunan Chenzhou Mining Co., Ltd. | CHINA | Conformant |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji | CHINA | Conformant |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd. | CHINA | Conformant |
| Tungsten | Hunan Litian Tungsten Industry Co., Ltd. | CHINA | Conformant |
| Tungsten | Hydrometallurg, JSC | RUSSIAN FEDERATION | Conformant |
| Tungsten | Japan New Metals Co., Ltd. | JAPAN | Conformant |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd. | CHINA | Conformant |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd. | CHINA | Conformant |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. | CHINA | On Smelter Look-up Tab Only |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | CHINA | Conformant |
| Tungsten | Jiangxi Xianglu Tungsten Co., Ltd. | CHINA | Active |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd. | CHINA | Conformant |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd. | CHINA | Conformant |
| Tungsten | JSC "Kirovgrad Hard Alloys Plant" | RUSSIAN FEDERATION | Active |
| Tungsten | Kennametal Fallon | UNITED STATES OF AMERICA | Conformant |
| Tungsten | Kennametal Huntsville | UNITED STATES OF AMERICA | Conformant |
| Tungsten | KGETS Co., Ltd. | KOREA, REPUBLIC OF | Conformant |
| Tungsten | Lianyou Metals Co., Ltd. | TAIWAN, PROVINCE OF CHINA | Conformant |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd. | CHINA | Conformant |
| Tungsten | Masan Tungsten Chemical LLC (MTC) | VIET NAM | Conformant |
| Tungsten | Moliren Ltd. | RUSSIAN FEDERATION | Conformant |
| Tungsten | Niagara Refining LLC | UNITED STATES OF AMERICA | Conformant |
| Tungsten | NPP Tyazhmetprom LLC | RUSSIAN FEDERATION | Active |

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| Tungsten | Philippine Chuangxin Industrial Co., Inc. | PHILIPPINES | Conformant |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd. | VIET NAM | Conformant |
| Tungsten | Unecha Refractory metals plant | RUSSIAN FEDERATION | Conformant |
| Tungsten | Wolfram Bergbau und Hutten AG | AUSTRIA | Conformant |
| Tungsten | Woltech Korea Co., Ltd. | KOREA, REPUBLIC OF | Conformant |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd. | CHINA | Conformant |
| Tungsten | Xiamen Tungsten Co., Ltd. | CHINA | Conformant |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd. | CHINA | Conformant |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd. | CHINA | Conformant |

We note the following in connection with the information contained in the foregoing tables:

- (a) The smelters and refiners reflected in the tables were identified by the Suppliers to us as potentially being part of our 2019 supply chain. However, not all of the included smelters and refiners are believed by us to have processed the necessary 3TG contained in our in-scope products, since most Suppliers reported to us at a “company level” the 3TG contained in all of their products, not just those in the products that they sold to us. Some Suppliers also may have reported to us smelters and refiners that were not in our supply chain due to over-inclusiveness in the information received from their suppliers or for other reasons. The smelters and refiners reflected above may not be all of the smelters and refiners in our supply chain, since many Suppliers were unable to identify all of the smelters and refiners used to process the necessary 3TG content contained in our in-scope products and not all of the Suppliers responded to our inquiries.
- (b) All compliance status information in the tables is as of May 15, 2020. Compliance status is based on information published by the RMI, without independent verification by us.
- (c) “Conformant” means that a smelter or refiner has successfully completed an assessment against the applicable Responsible Minerals Assurance Process (“RMAP”) standard or an equivalent cross-recognized assessment. Included smelters and refiners were not necessarily Conformant for all or part of 2019 and may not continue to be Conformant for any future period.
- (d) “Active” means that the smelter or refiner has committed to undergo an RMAP assessment, completed the relevant documents, and scheduled the on-site assessment. These may be in the pre-assessment, assessment, or corrective-action phases of the assessment.
- (e) A smelter or refiner is listed as “On Smelter Look-up Tab Only” if it was not Conformant or Active.
- (f) The tables include only entities that are listed as verified smelters on the Smelter Look-up tab list of the CMRT.
- (g) Smelter and refiner country location is based on information published by the RMI, without independent verification by us.

Country of Origin Information

The identified countries of origin of the 3TG processed by the smelters and refiners listed in the table above may have included the countries below, based on publicly available information, our RCOI and due diligence and other information gathered by the Service Provider. These may not be all of the countries of origin from which the smelters and refiners listed above may have sourced 3TG.

Afghanistan, Albania, Angola, Argentina, Armenia, Australia, Austria, Belarus, Belgium, Bermuda, Bolivia, Brazil, Bulgaria, Burundi, Cambodia, Canada, Central African Republic, Chile, China, Colombia, Czech Republic, Djibouti, Dominican Republic, Democratic Republic of the Congo, Ecuador, Egypt, England, Estonia, Ethiopia, Finland, France, Germany, Ghana, Guinea, Guyana, Hungary, India, Indonesia, Ireland, Israel, Italy, Ivory Coast, Japan, Kazakhstan, Kenya, Kyrgyzstan, Laos, Liberia, Lithuania, Luxembourg, Madagascar, Malaysia, Mali, Mauritania, Mexico, Mongolia, Morocco, Mozambique, Myanmar, Namibia, Netherlands, New Zealand, Niger, Nigeria, Papua New Guinea, Peru, Philippines, Poland, Portugal, Korea, Russia, Rwanda, Saudi Arabia, Sierra Leone, Singapore, Slovakia, Slovenia, South Africa, Spain, Sudan, Suriname, Sweden, Switzerland, Tanzania, Thailand, Turkey, Uganda, United Arab Emirates, United Kingdom, United States of America, Uzbekistan, Vietnam, Zambia and Zimbabwe.

Alternatively, or in addition, some of the smelters and refiners may have sourced from recycled or scrap sources.