

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

FORM SD

SPECIALIZED DISCLOSURE REPORT

DENTSPLY SIRONA Inc.

(Exact name of registrant as specified in its charter)

Delaware

(State or other jurisdiction of incorporation or organization)

0-16211

(Commission File Number)

39-1434669

(I.R.S. Employer Identification No.)

13320 Ballantyne Corporate Place,

(Address of Principal Executive Offices)

Charlotte

North Carolina

28277-3607

(Zip Code)

Richard C. Rosenzweig, Senior Vice President, Corporate Development, General Counsel and Secretary

(Name and telephone number, including area code, of the person to contact in connection with this report.)

(844) 848-0137

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, 2022

Section 1 - Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

This Form SD of DENTSPLY SIRONA Inc. (the "Company") is filed pursuant to Rule 13p-1 (the "Rule") promulgated under the Securities Exchange Act of 1934, as amended, for the reporting period from January 1, 2022 to December 31, 2022.

A copy of the Company's Conflict Minerals Report is provided as Exhibit 1.01 hereto and is publicly available through our website: <http://www.dentsplysirona.com> (under the "Investors" caption and "SEC Filings" subcaption).

Item 1.02 Exhibits

The Company has filed, as an exhibit to this Form SD, the Conflict Minerals Report required by Item 1.01.

Section 2 - Exhibits

Item 2.01 - Exhibits

The following exhibit is filed as part of this report:

| <u>Exhibit No.</u> | <u>Description</u> |
|----------------------|--------------------------|
| 1.01 | Conflict Minerals Report |

SIGNATURE

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

DENTSPLY SIRONA Inc.

By: /s/ Richard C. Rosenzweig
Richard C. Rosenzweig, Senior Vice President, Corporate
Development, General Counsel and Secretary

Date: May 31, 2023

DENTSPLY SIRONA Inc.
Conflict Minerals Report
For the Year Ended December 31, 2022

Company Overview

This report has been prepared by the management of DENTSPLY SIRONA Inc. (herein referred to as the “Company”, “Dentsply Sirona”, “we”, “us”, or “our”). The information includes the activities of all majority-owned subsidiaries and variable interest entities that are required to be consolidated.

The Company is the world’s largest manufacturer of professional dental products and technologies, with a 134-year history of innovation and service to the dental industry and patients worldwide. Dentsply Sirona develops, manufactures, and markets comprehensive solutions offering including technologically-advanced dental equipment as well as dental and healthcare consumable products under a strong portfolio of world class brands. As The Dental Solutions Company, Dentsply Sirona’s products provide innovative, high-quality and effective solutions to advance patient care and deliver better, safer and faster dentistry. The Company introduced the first dental electric drill over 130 years ago, the first dental X-ray unit approximately 100 years ago, the first dental computer-aided design/ computer-aided manufacturing (“CAD/CAM”) system over 30 years ago, and numerous other significant innovations including pioneering ultrasonic scaling to increase the speed, effectiveness and comfort of cleaning and revolutionizing both file and apex locator technology to make root canal procedures easier and safer. Dentsply Sirona continues to make significant investments in research and development (“R&D”), and its track record of innovative and profitable new products continues today. Dentsply Sirona’s worldwide headquarters is located in Charlotte, North Carolina and its shares of common stock are listed in the United States on Nasdaq under the symbol XRAY.

Introduction

This Conflict Minerals Report for the period from January 1, 2022 to December 31, 2022 is presented to comply with Rule 13p-1 under the Securities Exchange Act of 1934, as amended, and Form SD (the “Rule”). The Rule was adopted to implement reporting and disclosure requirements related to conflict minerals as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act. The Rule imposes reporting obligations on Securities and Exchange Commission (“SEC”) registrants whose manufactured products contain certain minerals that are necessary to the functionality or production of their respective products.

If a registrant determines that any columbite-tantalite (coltan), cassiterite, gold, wolframite or their derivatives, which are limited to tantalum, tin and tungsten (the “Subject Minerals”), are necessary to the functionality or production of a product manufactured by the registrant or contracted by the registrant to be manufactured, the registrant must conduct in good faith a Reasonable Country of

Origin Inquiry (“RCOI”) regarding those Subject Minerals that is reasonably designed to determine whether any of the Subject Minerals originated in the Democratic Republic of the Congo or an adjoining country (the “Covered Country” or “Covered Countries”) or are from recycled or scrap sources.

If, following the completion of the RCOI, a registrant knows that any of the necessary Subject Minerals originated in a Covered Country and are not from recycled or scrap sources, or has reason to believe that any of its necessary Subject Minerals may have originated in the Covered Countries and has reason to believe that its necessary Subject Minerals did not come from recycled or scrap sources, then the registrant must exercise due diligence on the source and chain of custody of the Subject Minerals that conforms to a nationally or internationally recognized due diligence framework and describe such due diligence in this separate Conflict Minerals Report.

In accordance with the Organisation for Economic Co-operation and Development Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition, the related supplements on tin, tungsten, tantalum and gold (the “Guidance”) and the Rule, this Conflict Minerals Report is available on the Company’s Investor Relations website at <https://investor.dentsplysirona.com/financial-information/sec-filings>

Consistent with the provisions of the Rule, the SEC’s Statement on the Effect of the Recent Court of Appeals Decision on the Conflict Minerals Rule, dated April 29, 2014; the SEC’s Order Issuing Stay, dated May 2, 2014; and the SEC’s Updated Statement on the Effect of the Court of Appeals Decision on the Conflict Minerals Rule, dated April 7, 2017, this Conflict Minerals Report has not been audited by a third party.

Conflict Minerals Program & Policy

The Company has actively engaged with its customers and suppliers for several years with respect to the use of conflict minerals. Dentsply Sirona adopted a conflict minerals policy articulating the conflict minerals supply chain due diligence process and the Company’s commitments to reporting obligations regarding conflict minerals. The policy is available online, and can be found here: [Dentsply Sirona Code of Ethics and Business Conduct](#)

RCOI and Due Diligence Framework

To determine whether necessary 3TGs in products originated in Covered Countries, the Company retained Assent, a third-party service provider, to assist in reviewing the supply chain and identifying risks. The Company provided a list composed of suppliers and parts associated with the in-scope products to Assent.

To collect data on the materials’ sources of origin procured by the supply chain, The Company utilized the Conflict Minerals Reporting Template (“CMRT”) version 6.22 or higher to conduct a survey of all in-scope suppliers.

During the supplier survey, Dentsply Sirona and Assent contacted suppliers via the ASM, a software-as-a-service (“SaaS”) platform provided by Assent that enables users to complete and track supplier communications, and allows suppliers to upload completed CMRTs directly to the platform for validation, assessment and management. The ASM also provides functionality that meets the OECD Guidance process expectations by evaluating the quality of each supplier response and assigning a health score based on the supplier’s declaration of process engagement. Additionally, the metrics provided in this report, as well as the step-by-step process for supplier engagement and upstream due diligence investigations performed are managed through this platform.

Via the ASM and Assent team, Dentsply Sirona requested that all in-scope suppliers complete a CMRT Training and education to guide suppliers on best practices and the use of this template were included. Assent monitored and tracked all communications in the ASM for future reporting and transparency. Dentsply Sirona directly contacted suppliers that were unresponsive to Assent’s communications during the diligence process and requested these suppliers complete the CMRT and submit it to Assent.

The Company’s program continues to include automated data validation on all submitted CMRTs. The goal of data validation is to increase the accuracy of submissions and identify any contradictory answers in the CMRT. This data validation is based on questions within the declaration tab of the CMRT which helps to identify areas that require further classification or risk assessment, as well as understand the due diligence efforts of the Tier 1 suppliers. The results of this data validation contribute to the program’s health assessment and are shared with the suppliers to ensure they understand areas that require clarification or improvement.

All submitted forms are accepted and classified as valid or invalid so that data is retained. Suppliers are contacted regarding invalid forms and are encouraged to submit a valid form. Suppliers are also provided with guidance on how to correct these validation errors in the form of feedback to their CMRT submission, training courses and direct engagement help through Assent’s multilingual Supplier Experience team. Since some suppliers may remain unresponsive to feedback, Dentsply Sirona tracks program gaps to account for future improvement opportunities.

As of May 2nd, 2023, there were 3 invalid supplier submissions that could not be corrected.

As of May 2nd, 2023, there were 285 suppliers in scope of the conflict minerals program and 198 provided a completed CMRT. The Company’s total response rate for this reporting year was 70.53%.

Based on the findings through the RCOI process, the Company was able to determine the countries of origin for a large portion of the 3TGs in its products. As such, the Company continued to perform further due diligence on the source and chain of custody of the minerals in question.

Design of Due Diligence

Dentsply Sirona designed its due diligence measures to conform, in all material respects, with the framework in the OECD Guidance and the related supplements. The program aligns with the five steps for due diligence that are described by the OECD Guidance and the Company continues to evaluate market expectations for data collection and reporting to achieve continuous improvement opportunities.

Due diligence requires the Company's necessary reliance on data provided by direct suppliers and third-party audit programs. There is a risk of incomplete or inaccurate data as the process cannot fully be owned by the Company. However, through continued outreach and process validation, this aligns with industry standards and market expectations for downstream companies' due diligence.

Due Diligence Performed

1) Establish Strong Company Management Systems

Conflict Minerals Policy

Dentsply Sirona is committed to the responsible sourcing of conflict minerals and it supports the humanitarian goal of ending violent conflict in the Covered Countries and thus established a Conflict Minerals Policy Statement, which is incorporated in Dentsply Sirona's Business Partner Code of Conduct

Internal Management System

Dentsply Sirona established a cross-functional Conflict Minerals Compliance Team led by the Company's Director, Global Procurement Center of Excellence. The Conflict Minerals Compliance Team is responsible for implementing the conflict minerals compliance strategy and briefing senior management about the results of these due diligence efforts.

Dentsply Sirona also uses a third-party service provider, Assent, to assist with evaluating supply chain information regarding 3TGs, identifying potential risks, and in the development and implementation of additional due diligence steps that the Company will undertake with suppliers in regards to conflict minerals.

The Company leverages Assent's Managed Services in order to work with dedicated program specialists who support Dentsply Sirona's conflict minerals program. The Company communicates regularly with the Assent team in order to receive updates on program status. Each member of Assent's Customer Success team is trained in conflict minerals compliance and understands the intricacies of the CMRT and conflict minerals reporting, as well as Section 1502 of the Dodd-Frank Act.

System of Controls and Transparency

Dentsply Sirona expects all suppliers to have policies and procedures in place to ensure that 3TGs used in the production of the products sold to Dentsply Sirona are DRC conflict-free. This means

that the products must not contain 3TGs that directly or indirectly finance or benefit armed groups in the Covered Countries. The Company relies on direct suppliers to provide information on the origin of the 3TGs contained in components and materials supplied, including sources of 3TGs that are supplied to them from lower-tier suppliers.

Dentsply Sirona's Business Partner Code of Conduct applies to all direct suppliers and outlines certain expected behaviors and practices. This code of conduct is based on industry and internationally-accepted principles such as the United Nations Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance. The Business Partner Code of Conduct is provided to all direct suppliers. If a supplier does not meet the Company's requirements, the relationship with this supplier will be evaluated. The Business Partner Code of Conduct is reviewed annually to ensure it continues to align with industry best practices.

Engagement with Suppliers

Dentsply Sirona has a strong relationship with direct suppliers. As an extremely important part of the supply chain, Dentsply Sirona has leveraged processes and educational opportunities in order to ensure non-English speaking suppliers have access to a free platform to upload their CMRTs, help desk support and other multilingual resources. Dentsply Sirona's suppliers are able to leverage Assent's team of supplier support specialists to ensure they receive appropriate support and understand how to properly file a CMRT. Suppliers are provided guidance in their native language, if needed.

The Company engages with suppliers directly to request a valid CMRT for the products that they supply to the Company. With respect to the OECD requirement to strengthen engagement with suppliers, Dentsply Sirona has developed an internal procedure that includes steps of supplier engagement escalation such as supplier meetings and corrective actions. Feedback from this engagement has allowed the Company to oversee improvements in supplier responses and supplier compliance for this initiative.

The Company continues to place a strong emphasis on supplier education and training. To accomplish this, Assent's online resources are leveraged, and all in-scope suppliers have been provided with access to their library of conflict minerals training and support resources.

Dentsply Sirona believes that the combination of the Supplier Code of Conduct, Conflict Minerals Policy, and direct engagement with suppliers for conflict minerals training and requests constitute a strong supplier engagement program.

Grievance Mechanism

Dentsply Sirona has a grievance mechanism whereby employees and suppliers can report concerns regarding the Company's business conduct and other matters. Dentsply Sirona is also retaining conflict minerals documentation in accordance with its existing corporate retention policy and procedures.

Maintain Records

The Company has adopted a policy to retain relevant documentation for a period of at least five years. Through Assent, a document retention policy to retain conflict minerals related documents,

including supplier responses to CMRTs and the sources identified within each reporting period, has been implemented. The Company stores all of the information and findings from this process in a database that can be audited by internal or external parties.

2) Identify and Assess Risk in the Supply Chain

Risks associated with supplier CMRT content are identified automatically by Assent's software based on criteria established for supplier responses. These risks are addressed by Assent staff and members of the Company's internal Conflict Minerals Team, who contact the supplier, gather pertinent data and perform an assessment of the supplier's conflict minerals status.

Risks at the supplier level may include non-responsive suppliers, incomplete CMRTs, or CMRTs that are submitted at the company level. In those cases where a company-level CMRT (such as when a company declares there are no 3TGs in any of its products) is submitted, Dentsply Sirona is unable to determine if all of the specified smelters and refiners were used for 3TGs in the products supplied to the Company.

Additionally, some suppliers indicated that they received information regarding their supply chains from fewer than 75% of their suppliers and, therefore, they could not provide a comprehensive list of all smelters or refiners in their supply chains.

Risks were identified by assessing the due diligence practices and status of smelters and refiners identified in the supply chain by upstream suppliers that listed mineral processing facilities on their CMRT declarations. Assent compared these facilities listed in the responses to the list of smelters and refiners consolidated by the Responsible Minerals Initiative ("RMI") to ensure that the facilities met the recognized definition of a 3TGs processing facility that was operational during the 2022 calendar year.

Assent determined if the smelter had been audited against a standard in conformance with the OECD Guidance, such as the Responsible Minerals Assurance Process ("RMAP"). Dentsply Sirona does not have a direct relationship with smelters and refiners and does not perform direct audits of these entities within their pre-supply chain. Smelters that have completed an RMAP audit are considered to be DRC-conflict free. In cases where the smelter's due diligence practices have not been audited against the RMAP standard or they are considered non-conformant by RMAP, follow-ups are made to suppliers reporting those facilities. Smelters are then assessed for the potential for sourcing risk

Each facility that meets the definition of a smelter or refiner of a 3TG mineral is assessed according to red-flag indicators defined in the OECD Guidance. Assent uses numerous factors to determine the level of risk that each smelter poses to the supply chain by identifying red flags. These factors include:

- Geographic proximity to the DRC and covered countries.
 - Known mineral source country of origin.
 - RMAP audit status.
 - Credible evidence of unethical or conflict sourcing.
 - Peer assessments conducted by credible third-party sources.
-

Risk mitigation activities are initiated whenever a supplier's CMRT reported facilities of concern. Through Assent, suppliers with submissions that included any smelters of concern were immediately provided with feedback instructing that supplier to take their own independent risk mitigation actions. Examples include the submission of a product-specific CMRT to better identify the connection to products that they supply to Dentsply Sirona. Additional escalation may have been necessary to address any continued sourcing from these smelters of concern. Suppliers are given clear performance objectives within reasonable timeframes with the ultimate goal of progressive elimination of these smelters of concern from the supply chain. In addition, suppliers are guided to the educational materials on mitigating the risks identified through the data collection process.

Suppliers are also evaluated on program strength, which assists in making key risk mitigation decisions as the program progresses. The criteria used to evaluate the strength of the program is based on certain questions in the CMRT related to the suppliers' conflict minerals practices and policies.

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

Together with Assent, Dentsply Sirona developed processes to assess and respond to the risks identified in the supply chain. Dentsply Sirona has a risk management plan, through which the conflict minerals program is implemented, managed and monitored. As the program progresses, escalations are sent to non-responsive suppliers to outline the importance of a response via CMRTs and to outline the required cooperation for compliance to the conflict minerals rules and the Company's expectations.

Feedback on supplier submissions is given directly to suppliers and educational resources are provided to assist suppliers in corrective action methods or to improve their internal programs. The Company engages suppliers believed to be supplying 3TGs from sources that may support conflict in the Covered Countries to establish an alternative source of 3TGs that does not support such conflict, as provided in the OECD Guidance. Assent also communicates directly with smelters that have not yet been determined to be conformant with the RMAP in order to request sourcing information and encourage their involvement with the RMI program.

In cases where suppliers have continuously been non-responsive or are not committed to corrective action plans, the Company will assess if replacing that supplier is feasible. The results of the program and risk assessment are shared with the Conflict Minerals Team and senior management of Dentsply Sirona to ensure transparency within the Company.

4) Carry out independent third-party audit of supply chain due diligence

Dentsply Sirona does not have a direct relationship with any 3TG smelters or refiners and does not perform or direct audits of these entities within the supply chain. Instead, the Company relies on third-party audits of smelters and refiners conducted as part of the RMAP. The RMAP uses independent private-sector auditors, and audits the source, including the mines of origin, and the chain of custody of the conflict minerals used by smelters and refiners that agree to participate in the program.

Assent also directly contacts smelters and refiners that are not currently enrolled in the RMAP to encourage their participation and gather information regarding each facilities' sourcing practices on behalf of its compliance partners. Dentsply Sirona is a signatory of this communication in accordance with the requirements of downstream companies detailed in the OECD Guidance.

5) Report Annually on Supply Chain Due Diligence

Dentsply Sirona has published the Form SD for the year ended December 31, 2022. This report is available on the Investor Relations section of the Company's website at <https://investor.dentsplysirona.com/financial-information/sec-filings>. Information found on or accessed through this website is not considered part of this report and is not incorporated by reference herein. Dentsply Sirona has also publicly filed a Form SD and this report with the U.S. Securities and Exchange Commission.

This year the Company has also considered impacts from the European Union Conflict Minerals Rule when disclosing details with regards to due diligence efforts. The Company will continue to expand efforts both for transparency through the data collection process and risk evaluation, as well as the disclosure of efforts through the form of public report.

Results of Due Diligence

Supply chain outreach is required to identify the upstream sources of origin of tin, tantalum, tungsten and gold. Following the industry standard process, CMRTs are sent to and requested from Tier 1 suppliers, who are expected to follow this process until the smelter and refiner sources are identified. The following is the result of the outreach conducted by Dentsply Sirona for the 2022 reporting year.

Supply Chain Outreach Metrics

| Year | Number of In-Scope Suppliers | Submission Rate | Invalid Submission Rate |
|------|------------------------------|-----------------|-------------------------|
| 2022 | 285 | 70.53% | 1.05% |
| 2021 | 297 | 71% | 4% |
| 2020 | 290 | 70% | 2% |
| 2019 | 340 | 72% | 2% |

From the gathered responses, 5 smelters that potentially posed a risk due to the presence of some red flag indicators were identified. Suppliers that identified these specific smelters of concern on their CMRT were contacted in accordance with the OECD Guidance to inform them of the potential for risk, and to evaluate whether or not these smelters could be connected to Dentsply

Sirona’s products. The suppliers were asked to complete a user-defined or product-level CMRT specific to the materials, products or piece parts purchased by Dentsply Sirona, rather than a company-level CMRT, to better identify the connection to products that they supply to Dentsply Sirona. Other suppliers were evaluated internally to determine if they were in fact still active suppliers. If not, they were removed from the scope of data collection.

| Status | Number of Identified Smelters or Refiners |
|-----------------|---|
| RMAP Conformant | 223 |
| RMAP Active | 8 |
| Not-Enrolled | 89 |
| Non-Conformant | 24 |

Steps to be Taken to Mitigate Risk

Dentsply Sirona has taken, or intends to take, the following steps to improve the due diligence conducted to further mitigate any risk that the necessary 3TGs in the Company’s products could benefit armed groups in the DRC or adjoining countries:

- Continue to evaluate upstream sources through a broader set of tools to evaluate risk. These include, but are not limited to:
 - Using a comprehensive smelter and refiner library with detailed status and notes for each listing.
 - Scanning for credible media on each smelter and refiner to flag risk issues.
 - Comparing the list of smelters and refiners against government watch and denied parties lists.
- Engage with suppliers more closely, and provide more information and training resources regarding responsible sourcing of 3TGs.
- Encourage suppliers to have due diligence procedures in place for their supply chains to improve the content of the responses from such suppliers.
- Continue to include a conflict minerals flow-down clause in new or renewed supplier contracts, as well as included in the terms and conditions of each purchase order issued.
- Following the OECD Guidance process, increase the emphasis on clean and validated smelter and refiner information from the supply chain through feedback and detailed smelter analysis.

Smelter & Refiner Risk Evaluation

Understanding the risks associated with the smelters and refiners potentially providing material into Dentsply Sirona's supply chain is an important part of the due diligence process. Through Assent, comprehensive and ongoing analysis is conducted by Assent's smelter library manager to assess sourcing risk. This information is used to:

- Provide supplier feedback.
- Determine the health of the Company's overall program.
- Conduct outreach to smelters, refiners and their respective associations.
- Provide detailed analysis in this report.

The following risk categories are used for smelter evaluation and risk determination:

- Geo-Risk
 - Did the mineral originate from or has been transported through a conflict-affected area as defined by Section 1502 of the Dodd-Frank Act (the DRC and its nine adjoining countries; Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia)?
 - Audit Status
 - Has the refiner's due diligence practices been audited against a standard in conformance with the OECD Guidance?
 - Assent relies on the RMI audit standard, including cross-recognition of the London Bullion Market Association ("LBMA") Good Delivery Program and the Responsible Jewelry Council Chain of Custody Certification, which are developed according to global standards including the OECD Guidance.
 - Sourcing Risk
 - Has evidence of any other red flag that is supported by credible sources been identified?
-

APPENDIX A - Smelter and Refiner List

| Metal | Smelter Name | Smelter Facility Location | Smelter ID | RMAP Audit Status |
|-------|---|---------------------------|------------|-------------------|
| Gold | Agosi AG | Germany | CID000035 | Conformant |
| Gold | C. Hafner GmbH + Co. KG | Germany | CID000176 | Conformant |
| Gold | Heimerle + Meule GmbH | Germany | CID000694 | Conformant |
| Gold | Asahi Refining Canada Ltd. | Canada | CID000924 | Conformant |
| Gold | Metalor Technologies S.A. | Switzerland | CID001153 | Conformant |
| Gold | Advanced Chemical Company | United States Of America | CID000015 | Conformant |
| Gold | Aida Chemical Industries Co., Ltd. | Japan | CID000019 | Conformant |
| Gold | Almalyk Mining and Metallurgical Complex (AMMC) | Uzbekistan | CID000041 | Conformant |
| Gold | AngloGold Ashanti Corregido Sitio Mineracao | Brazil | CID000058 | Conformant |
| Gold | Argor-Heraeus S.A. | Switzerland | CID000077 | Conformant |
| Gold | Asahi Pretec Corp. | Japan | CID000082 | Conformant |
| Gold | Asaka Riken Co., Ltd. | Japan | CID000090 | Conformant |
| Gold | Aurubis AG | Germany | CID000113 | Conformant |
| Gold | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | Philippines | CID000128 | Conformant |
| Gold | Boliden AB | Sweden | CID000157 | Conformant |

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|------|---|--------------------|-----------|--|
| Gold | CCR Refinery - Glencore Canada Corporation | Canada | CID000185 | Conformant |
| Gold | Cendres + Metaux S.A. | Switzerland | CID000189 | Non Conformant |
| Gold | Chimet S.p.A. | Italy | CID000233 | Conformant |
| Gold | Chugai Mining | Japan | CID000264 | Conformant |
| Gold | Daye Non-Ferrous Metals Mining Ltd. | China | CID000343 | In Communication |
| Gold | DSC (Do Sung Corporation) | Korea, Republic Of | CID000359 | Conformant |
| Gold | Dowa | Japan | CID000401 | Conformant |
| Gold | Eco-System Recycling Co., Ltd. East Plant | Japan | CID000425 | Conformant |
| Gold | JSC Novosibirsk Refinery | Russian Federation | CID000493 | RMI Due Diligence Review - Unable to Proceed |
| Gold | LT Metal Ltd. | Korea, Republic Of | CID000689 | Conformant |
| Gold | Heraeus Metals Hong Kong Ltd. | China | CID000707 | Conformant |
| Gold | Heraeus Germany GmbH Co. KG | Germany | CID000711 | Conformant |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | China | CID000801 | Conformant |
| Gold | Ishifuku Metal Industry Co., Ltd. | Japan | CID000807 | Conformant |
| Gold | Istanbul Gold Refinery | Turkey | CID000814 | Conformant |

| | | | | |
|------|---|--------------------------|-----------|--|
| Gold | Japan Mint | Japan | CID000823 | Conformant |
| Gold | Jiangxi Copper Co., Ltd. | China | CID000855 | Conformant |
| Gold | Asahi Refining USA Inc. | United States Of America | CID000920 | Conformant |
| Gold | JSC Uralelectromed | Russian Federation | CID000929 | RMI Due Diligence Review - Unable to Proceed |
| Gold | JX Nippon Mining & Metals Co., Ltd. | Japan | CID000937 | Conformant |
| Gold | Kazzinc | Kazakhstan | CID000957 | Conformant |
| Gold | Kennecott Utah Copper LLC | United States Of America | CID000969 | Conformant |
| Gold | Kojima Chemicals Co., Ltd. | Japan | CID000981 | Conformant |
| Gold | LS-NIKKO Copper Inc. | Korea, Republic Of | CID001078 | Conformant |
| Gold | Materion | United States Of America | CID001113 | Conformant |
| Gold | Matsuda Sangyo Co., Ltd. | Japan | CID001119 | Conformant |
| Gold | Metalor Technologies (Suzhou) Ltd. | China | CID001147 | Conformant |
| Gold | Metalor Technologies (Hong Kong) Ltd. | China | CID001149 | Conformant |
| Gold | Metalor Technologies (Singapore) Pte., Ltd. | Singapore | CID001152 | Conformant |
| Gold | Metalor USA Refining Corporation | United States Of America | CID001157 | Conformant |

| | | | | | |
|------|---|-----------|--------------------|-----------|--|
| Gold | Metalurgica Penoles S.A. De C.V. | Met-Mex | Mexico | CID001161 | Conformant |
| Gold | Mitsubishi Corporation | Materials | Japan | CID001188 | Conformant |
| Gold | Mitsui Mining and Smelting Co., Ltd. | | Japan | CID001193 | Conformant |
| Gold | Moscow Special Alloys Processing Plant | | Russian Federation | CID001204 | RMI Due Diligence Review - Unable to Proceed |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.S. | | Turkey | CID001220 | Conformant |
| Gold | Navoi Mining and Metallurgical Combinat | | Uzbekistan | CID001236 | Conformant |
| Gold | Nihon Material Co., Ltd. | | Japan | CID001259 | Conformant |
| Gold | Ohura Precious Metal Industry Co., Ltd. | | Japan | CID001325 | Conformant |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | | Russian Federation | CID001326 | RMI Due Diligence Review - Unable to Proceed |
| Gold | MKS PAMP SA | | Switzerland | CID001352 | Conformant |
| Gold | Prioksky Plant of Non-Ferrous Metals | | Russian Federation | CID001386 | RMI Due Diligence Review - Unable to Proceed |
| Gold | PT Aneka Tambang (Persero) Tbk | | Indonesia | CID001397 | Conformant |
| Gold | PX Precinox S.A. | | Switzerland | CID001498 | Conformant |
| Gold | Rand Refinery (Pty) Ltd. | | South Africa | CID001512 | Conformant |

| | | | | |
|------|--|---------------------------|-----------|--|
| Gold | Royal Canadian Mint | Canada | CID001534 | Conformant |
| Gold | Samduck Precious Metals | Korea, Republic Of | CID001555 | Non Conformant |
| Gold | SEMPSA Joyeria Plateria S.A. | Spain | CID001585 | Conformant |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd. | China | CID001622 | Conformant |
| Gold | Sichuan Tianze Precious Metals Co., Ltd. | China | CID001736 | Conformant |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals | Russian Federation | CID001756 | RMI Due Diligence Review - Unable to Proceed |
| Gold | Solar Applied Materials Technology Corp. | Taiwan, Province Of China | CID001761 | Conformant |
| Gold | Sumitomo Metal Mining Co., Ltd. | Japan | CID001798 | Conformant |
| Gold | Tanaka Kikinzoku Kogyo K.K. | Japan | CID001875 | Conformant |
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM | China | CID001909 | Outreach Required |
| Gold | Shandong Gold Smelting Co., Ltd. | China | CID001916 | Conformant |
| Gold | Tokuriki Honten Co., Ltd. | Japan | CID001938 | Conformant |
| Gold | Torecom | Korea, Republic Of | CID001955 | Conformant |
| Gold | Umicore S.A. Business Unit Precious Metals Refining | Belgium | CID001980 | Conformant |

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| Gold | United Precious Metal Refining, Inc. | United States Of America | CID001993 | Conformant |
| Gold | Valcambi S.A. | Switzerland | CID002003 | Conformant |
| Gold | Western Australian Mint (T/a The Perth Mint) | Australia | CID002030 | Conformant |
| Gold | Yamakin Co., Ltd. | Japan | CID002100 | Conformant |
| Gold | Yokohama Metal Co., Ltd. | Japan | CID002129 | Conformant |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | China | CID002224 | Conformant |
| Gold | Gold Refinery of Zijin Mining Group Co., Ltd. | China | CID002243 | Conformant |
| Gold | SAFINA A.S. | Czechia | CID002290 | Conformant |
| Gold | Umicore Precious Metals Thailand | Thailand | CID002314 | Non Conformant |
| Gold | Geib Refining Corporation | United States Of America | CID002459 | Conformant |
| Gold | MMTC-PAMP India Pvt., Ltd. | India | CID002509 | Conformant |
| Gold | KGHM Polska Miedz Spolka Akcyjna | Poland | CID002511 | Conformant |
| Gold | Singway Technology Co., Ltd. | Taiwan, Province Of China | CID002516 | Non Conformant |
| Gold | Al Etihad Gold Refinery DMCC | United Arab Emirates | CID002560 | Conformant |
| Gold | Emirates Gold DMCC | United Arab Emirates | CID002561 | Conformant |

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| Gold | T.C.A S.p.A | Italy | CID002580 | Conformant |
| Gold | REMONDIS PMR B.V. | Netherlands | CID002582 | Conformant |
| Gold | Korea Zinc Co., Ltd. | Korea, Republic Of | CID002605 | Conformant |
| Gold | Marsam Metals | Brazil | CID002606 | Non Conformant |
| Gold | TOO Tau-Ken-Altyn | Kazakhstan | CID002615 | Conformant |
| Gold | Abington Reldan Metals, LLC | United States Of America | CID002708 | Conformant |
| Gold | SAAMP | France | CID002761 | Conformant |
| Gold | L'Orfebre S.A. | Andorra | CID002762 | Conformant |
| Gold | 8853 S.p.A. | Italy | CID002763 | Non Conformant |
| Gold | Italpreziosi | Italy | CID002765 | Conformant |
| Gold | WIELAND Edelmetalle GmbH | Germany | CID002778 | Conformant |
| Gold | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH | Austria | CID002779 | Conformant |
| Gold | AU Traders and Refiners | South Africa | CID002850 | Non Conformant |
| Gold | GGC Gujrat Gold Centre Pvt. Ltd. | India | CID002852 | Active |
| Gold | Bangalore Refinery | India | CID002863 | Conformant |
| Gold | SungEel HiMetal Co., Ltd. | Korea, Republic Of | CID002918 | Conformant |
| Gold | Planta Recuperadora de Metales SpA | Chile | CID002919 | Conformant |

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| Gold | Safimet S.p.A | Italy | CID002973 | Non Conformant |
| Gold | NH Recytech Company | Korea, Republic Of | CID003189 | Conformant |
| Gold | C.I Metales Procesados Industriales SAS | Colombia | CID003421 | Active |
| Gold | Eco-System Recycling Co., Ltd. North Plant | Japan | CID003424 | Conformant |
| Gold | Eco-System Recycling Co., Ltd. West Plant | Japan | CID003425 | Conformant |
| Gold | Augmont Enterprises Private Limited | India | CID003461 | Active |
| Gold | Alexy Metals | United States Of America | CID003500 | Active |
| Gold | Sancus ZFS (L'Orfebre, SA) | Colombia | CID003529 | Conformant |
| Gold | Metal Concentrators SA (Pty) Ltd. | South Africa | CID003575 | Conformant |
| Gold | WEEEREFINING | France | CID003615 | Active |
| Gold | Gold by Gold Colombia | Colombia | CID003641 | Conformant |
| Gold | Atasay Kuyumculuk Sanayi Ve Ticaret A.S. | Turkey | CID000103 | Outreach Required |
| Gold | Caridad | Mexico | CID000180 | Outreach Required |
| Gold | Yunnan Copper Industry Co., Ltd. | China | CID000197 | Outreach Required |
| Gold | Refinery of Seemine Gold Co., Ltd. | China | CID000522 | Outreach Required |

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| Gold | Guoda Safina High-Tech Environmental Refinery Co., Ltd. | China | CID000651 | Outreach Required |
| Gold | Hangzhou Fuchunjiang Smelting Co., Ltd. | China | CID000671 | Outreach Required |
| Gold | Hunan Chenzhou Mining Co., Ltd. | China | CID000767 | Outreach Required |
| Gold | HwaSeong CJ CO., LTD. | Korea, Republic Of | CID000778 | Communication Suspended - Not Interested |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant | Russian Federation | CID000927 | RMI Due Diligence Review - Unable to Proceed |
| Gold | Kazakhmys Smelting LLC | Kazakhstan | CID000956 | In Communication |
| Gold | Kyrgyzaltyn JSC | Kyrgyzstan | CID001029 | Non Conformant |
| Gold | L'azurde Company For Jewelry | Saudi Arabia | CID001032 | RMI Due Diligence Review - Unable to Proceed |
| Gold | Lingbao Gold Co., Ltd. | China | CID001056 | Outreach Required |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd. | China | CID001058 | Outreach Required |
| Gold | Luoyang Zijin Yinhui Gold Refinery Co., Ltd. | China | CID001093 | Outreach Required |
| Gold | Penglai Penggang Gold Industry Co., Ltd. | China | CID001362 | Outreach Required |
| Gold | Sabin Metal Corp. | United States Of America | CID001546 | Communication Suspended - Not Interested |

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| Gold | Samwon Metals Corp. | Korea, Republic Of | CID001562 | Communication Suspended - Not Interested |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | China | CID001619 | Outreach Required |
| Gold | Tongling Nonferrous Metals Group Co., Ltd. | China | CID001947 | Outreach Required |
| Gold | Morris and Watson | New Zealand | CID002282 | In Communication |
| Gold | Guangdong Jinding Gold Limited | China | CID002312 | Outreach Required |
| Gold | Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd. | China | CID000773 | Outreach Required |
| Gold | Super Dragon Technology Co., Ltd. | Taiwan, Province Of China | CID001810 | Outreach Required |
| Gold | Fidelity Printers and Refiners Ltd. | Zimbabwe | CID002515 | RMI Due Diligence Review - Unable to Proceed |
| Gold | Shandong Humon Smelting Co., Ltd. | China | CID002525 | Outreach Required |
| Gold | Shenzhen Zhonghenglong Real Industry Co., Ltd. | China | CID002527 | Outreach Required |
| Gold | International Precious Metal Refiners | United Arab Emirates | CID002562 | In Communication |
| Gold | Kaloti Precious Metals | United Arab Emirates | CID002563 | RMI Due Diligence Review - Unable to Proceed |
| Gold | Sudan Gold Refinery | Sudan | CID002567 | Outreach Required |

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| Gold | Fujairah Gold FZC | United Arab Emirates | CID002584 | Outreach Required |
| Gold | Industrial Refining Company | Belgium | CID002587 | Non Conformant |
| Gold | Shirpur Gold Refinery Ltd. | India | CID002588 | Outreach Required |
| Gold | Sai Refinery | India | CID002853 | Outreach Required |
| Gold | Modeltech Sdn Bhd | Malaysia | CID002857 | Non Conformant |
| Gold | Kyshtym Copper-Electrolytic Plant ZAO | Russian Federation | CID002865 | RMI Due Diligence Review - Unable to Proceed |
| Gold | Degussa Sonne / Mond Goldhandel GmbH | Germany | CID002867 | Outreach Required |
| Gold | Pease & Curren | United States Of America | CID002872 | Communication Suspended - Not Interested |
| Gold | JALAN & Company | India | CID002893 | Outreach Required |
| Gold | State Research Institute Center for Physical Sciences and Technology | Lithuania | CID003153 | Outreach Required |
| Gold | African Gold Refinery | Uganda | CID003185 | RMI Due Diligence Review - Unable to Proceed |
| Gold | Gold Coast Refinery | Ghana | CID003186 | Outreach Required |
| Gold | QG Refining, LLC | United States Of America | CID003324 | Outreach Required |
| Gold | Dijllah Gold Refinery FZC | United Arab Emirates | CID003348 | Outreach Required |
| Gold | CGR Metalloys Pvt Ltd. | India | CID003382 | Outreach Required |

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| Gold | Sovereign Metals | India | CID003383 | Outreach Required |
| Gold | Kundan Care Products Ltd. | India | CID003463 | In Communication |
| Gold | Emerald Jewel Industry India Limited (Unit 1) | India | CID003487 | In Communication |
| Gold | Emerald Jewel Industry India Limited (Unit 2) | India | CID003488 | In Communication |
| Gold | Emerald Jewel Industry India Limited (Unit 3) | India | CID003489 | In Communication |
| Gold | Emerald Jewel Industry India Limited (Unit 4) | India | CID003490 | In Communication |
| Gold | K.A. Rasmussen | Norway | CID003497 | Outreach Required |
| Gold | Sellem Industries Ltd. | Mauritania | CID003540 | Communication Suspended - Not Interested |
| Gold | MD Overseas | India | CID003548 | In Communication |
| Gold | Metallix Refining Inc. | United States Of America | CID003557 | In Communication |
| Gold | ABC Refinery Pty Ltd. | Australia | CID002920 | Outreach Required |
| Gold | Shenzhen CuiLu Gold Co., Ltd. | China | CID002750 | Outreach Required |
| Gold | Albino Mountinho Lda. | Portugal | CID002760 | Outreach Required |
| Gold | Dongwu Gold Group | China | CID003663 | Outreach Required |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd. | China | CID000211 | Conformant |
| Tantalum | F&X Electro-Materials Ltd. | China | CID000460 | Conformant |

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| Tantalum | XIMEI RESOURCES (GUANGDONG) LIMITED | China | CID000616 | Conformant |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd. | China | CID000914 | Conformant |
| Tantalum | Jiujiang Tanbre Co., Ltd. | China | CID000917 | Conformant |
| Tantalum | AMG Brasil | Brazil | CID001076 | Conformant |
| Tantalum | Metallurgical Products India Pvt., Ltd. | India | CID001163 | Conformant |
| Tantalum | Mineracao Taboca S.A. | Brazil | CID001175 | Conformant |
| Tantalum | Mitsui Mining and Smelting Co., Ltd. | Japan | CID001192 | Conformant |
| Tantalum | NPM Silmet AS | Estonia | CID001200 | Conformant |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd. | China | CID001277 | Conformant |
| Tantalum | QuantumClean | United States Of America | CID001508 | Conformant |
| Tantalum | Yanling Jincheng Tantalum & Niobium Co., Ltd. | China | CID001522 | Conformant |
| Tantalum | Solikamsk Magnesium Works OAO | Russian Federation | CID001769 | RMI Due Diligence Review - Unable to Proceed |
| Tantalum | Taki Chemical Co., Ltd. | Japan | CID001869 | Conformant |
| Tantalum | Telex Metals | United States Of America | CID001891 | Conformant |
| Tantalum | Ulba Metallurgical Plant JSC | Kazakhstan | CID001969 | Conformant |

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| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd. | China | CID002492 | Conformant |
| Tantalum | D Block Metals, LLC | United States Of America | CID002504 | Conformant |
| Tantalum | FIR Metals & Resource Ltd. | China | CID002505 | Conformant |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd. | China | CID002506 | Conformant |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd. | China | CID002508 | Conformant |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd. | China | CID002512 | Conformant |
| Tantalum | KEMET de Mexico | Mexico | CID002539 | Conformant |
| Tantalum | TANIOBIS Co., Ltd. | Thailand | CID002544 | Conformant |
| Tantalum | TANIOBIS GmbH | Germany | CID002545 | Conformant |
| Tantalum | Materion Newton Inc. | United States Of America | CID002548 | Conformant |
| Tantalum | TANIOBIS Japan Co., Ltd. | Japan | CID002549 | Conformant |
| Tantalum | TANIOBIS Smelting GmbH & Co. KG | Germany | CID002550 | Conformant |
| Tantalum | Global Advanced Metals Boyertown | United States Of America | CID002557 | Conformant |
| Tantalum | Global Advanced Metals Aizu | Japan | CID002558 | Conformant |
| Tantalum | Resind Industria e Comercio Ltda. | Brazil | CID002707 | Conformant |
| Tantalum | Jiangxi Tuohong New Raw Material | China | CID002842 | Conformant |

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| Tantalum | RFH Yancheng Jinye New Material Technology Co., Ltd. | China | CID003583 | Conformant |
| Tantalum | 5D Production OU | Estonia | CID003926 | Outreach Required |
| Tin | Alpha | United States Of America | CID000292 | Conformant |
| Tin | Fenix Metals | Poland | CID000468 | Conformant |
| Tin | Gejiu Non-Ferrous Metal Processing Co., Ltd. | China | CID000538 | Conformant |
| Tin | Malaysia Smelting Corporation (MSC) | Malaysia | CID001105 | Conformant |
| Tin | Mineracao Taboca S.A. | Brazil | CID001173 | Conformant |
| Tin | Minsur | Peru | CID001182 | Conformant |
| Tin | Mitsubishi Materials Corporation | Japan | CID001191 | Conformant |
| Tin | Operaciones Metalurgicas S.A. | Bolivia (Plurinational State Of) | CID001337 | Conformant |
| Tin | PT Mitra Stania Prima | Indonesia | CID001453 | Conformant |
| Tin | PT Refined Bangka Tin | Indonesia | CID001460 | Conformant |
| Tin | PT Timah Tbk Kundur | Indonesia | CID001477 | Conformant |
| Tin | PT Timah Tbk Mentok | Indonesia | CID001482 | Conformant |
| Tin | Rui Da Hung | Taiwan, Province Of China | CID001539 | Conformant |
| Tin | Thaisarco | Thailand | CID001898 | Conformant |

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| Tin | Yunnan Chengfeng Non-ferrous Metals Co., Ltd. | China | CID002158 | Conformant |
| Tin | Magnu's Minerais Metais e Ligas Ltda. | Brazil | CID002468 | Conformant |
| Tin | PT ATD Makmur Mandiri Jaya | Indonesia | CID002503 | Conformant |
| Tin | Aurubis Beerse | Belgium | CID002773 | Conformant |
| Tin | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | China | CID000228 | Conformant |
| Tin | PT Aries Kencana Sejahtera | Indonesia | CID000309 | Conformant |
| Tin | Dowa | Japan | CID000402 | Conformant |
| Tin | EM Vinto | Bolivia (Plurinational State Of) | CID000438 | Conformant |
| Tin | Estanho de Rondonia S.A. | Brazil | CID000448 | Conformant |
| Tin | Gejiu Zili Mining And Metallurgy Co., Ltd. | China | CID000555 | Non Conformant |
| Tin | Gejiu Kai Meng Industry and Trade LLC | China | CID000942 | Non Conformant |
| Tin | China Tin Group Co., Ltd. | China | CID001070 | Conformant |
| Tin | Metallic Resources, Inc. | United States Of America | CID001142 | Conformant |
| Tin | Jiangxi New Nanshan Technology Ltd. | China | CID001231 | Conformant |
| Tin | Novosibirsk Tin Combine | Russian Federation | CID001305 | RMI Due Diligence Review - Unable to Proceed |

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| Tin | O.M. Manufacturing (Thailand) Co., Ltd. | Thailand | CID001314 | Conformant |
| Tin | PT Artha Cipta Langgeng | Indonesia | CID001399 | Conformant |
| Tin | PT Babel Inti Perkasa | Indonesia | CID001402 | Conformant |
| Tin | PT Babel Surya Alam Lestari | Indonesia | CID001406 | Conformant |
| Tin | PT Belitung Industri Sejahtera | Indonesia | CID001421 | Active |
| Tin | PT Bukit Timah | Indonesia | CID001428 | Conformant |
| Tin | PT Prima Timah Utama | Indonesia | CID001458 | Conformant |
| Tin | PT Sariwiguna Binasentosa | Indonesia | CID001463 | Conformant |
| Tin | PT Stanindo Inti Perkasa | Indonesia | CID001468 | Conformant |
| Tin | PT Timah Nusantara | Indonesia | CID001486 | Active |
| Tin | PT Tinindo Inter Nusa | Indonesia | CID001490 | Non Conformant |
| Tin | PT Tommy Utama | Indonesia | CID001493 | Conformant |
| Tin | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | China | CID001908 | Non Conformant |
| Tin | White Solder Metalurgia e Mineracao Ltda. | Brazil | CID002036 | Conformant |
| Tin | Tin Smelting Branch of Yunnan Tin Co., Ltd. | China | CID002180 | Conformant |
| Tin | CV Venus Inti Perkasa | Indonesia | CID002455 | Conformant |
| Tin | Melt Metais e Ligas S.A. | Brazil | CID002500 | Non Conformant |
| Tin | O.M. Manufacturing Philippines, Inc. | Philippines | CID002517 | Conformant |

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| Tin | PT Rajehan Ariq | Indonesia | CID002593 | Conformant |
| Tin | PT Cipta Persada Mulia | Indonesia | CID002696 | Conformant |
| Tin | Resind Industria e Comercio Ltda. | Brazil | CID002706 | Conformant |
| Tin | Super Ligas | Brazil | CID002756 | Active |
| Tin | Aurubis Berango | Spain | CID002774 | Conformant |
| Tin | PT Sukses Inti Makmur | Indonesia | CID002816 | Conformant |
| Tin | PT Menara Cipta Mulia | Indonesia | CID002835 | Conformant |
| Tin | Guangdong Hanhe Non-Ferrous Metal Co., Ltd. | China | CID003116 | Conformant |
| Tin | Chifeng Dajingzi Tin Industry Co., Ltd. | China | CID003190 | Conformant |
| Tin | PT Bangka Serumpun | Indonesia | CID003205 | Conformant |
| Tin | Tin Technology & Refining | United States Of America | CID003325 | Conformant |
| Tin | PT Rajawali Rimba Perkasa | Indonesia | CID003381 | Conformant |
| Tin | Luna Smelter, Ltd. | Rwanda | CID003387 | Conformant |
| Tin | Yunnan Yunfan Non-ferrous Metals Co., Ltd. | China | CID003397 | Non Conformant |
| Tin | PT Mitra Sukses Globalindo | Indonesia | CID003449 | Conformant |
| Tin | CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda | Brazil | CID003486 | Conformant |
| Tin | CRM Synergies | Spain | CID003524 | Conformant |

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| Tin | Fabrica Auricchio Industria e Comercio Ltda. | Brazil | CID003582 | Conformant |
| Tin | DS Myanmar | Myanmar | CID003831 | Conformant |
| Tin | PT Putera Sarana Shakti (PT PSS) | Indonesia | CID003868 | Conformant |
| Tin | PT Premium Tin Indonesia | Indonesia | CID000313 | Conformant |
| Tin | PT Bangka Tin Industry | Indonesia | CID001419 | In Communication |
| Tin | PT Panca Mega Persada | Indonesia | CID001457 | In Communication |
| Tin | VQB Mineral and Trading Group JSC | Viet Nam | CID002015 | Outreach Required |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company | Viet Nam | CID002573 | Outreach Required |
| Tin | PT Tirus Putra Mandiri | Indonesia | CID002478 | In Communication |
| Tin | CV Ayi Jaya | Indonesia | CID002570 | Conformant |
| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | Viet Nam | CID002572 | Non Conformant |
| Tin | Tuyen Quang Non-Ferrous Metals Joint Stock Company | Viet Nam | CID002574 | Outreach Required |
| Tin | An Vinh Joint Stock Mineral Processing Company | Viet Nam | CID002703 | Outreach Required |
| Tin | PT Bangka Prima Tin | Indonesia | CID002776 | Conformant |
| Tin | Modeltech Sdn Bhd | Malaysia | CID002858 | Non Conformant |
| Tin | Pongpipat Company Limited | Myanmar | CID003208 | Outreach Required |

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| Tin | Dongguan CiEXPO Environmental Engineering Co., Ltd. | China | CID003356 | Non Conformant |
| Tin | Precious Minerals and Smelting Limited | India | CID003409 | Non Conformant |
| Tin | Gejiu City Fuxiang Industry and Trade Co., Ltd. | China | CID003410 | Outreach Required |
| Tungsten | A.L.M.T. Corp. | Japan | CID000004 | Conformant |
| Tungsten | Kennametal Huntsville | United States Of America | CID000105 | Conformant |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd. | China | CID000218 | Conformant |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd. | China | CID000258 | Conformant |
| Tungsten | Global Tungsten & Powders LLC | United States Of America | CID000568 | Conformant |
| Tungsten | Hunan Chenzhou Mining Co., Ltd. | China | CID000766 | Conformant |
| Tungsten | Hunan Jintai New Material Co., Ltd. | China | CID000769 | Conformant |
| Tungsten | Japan New Metals Co., Ltd. | Japan | CID000825 | Conformant |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd. | China | CID000875 | Conformant |
| Tungsten | Kennametal Fallon | United States Of America | CID000966 | Conformant |
| Tungsten | Wolfram Bergbau und Hutten AG | Austria | CID002044 | Conformant |
| Tungsten | Xiamen Tungsten Co., Ltd. | China | CID002082 | Conformant |

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| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd. | China | CID002315 | Conformant |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd. | China | CID002316 | Conformant |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd. | China | CID002317 | Conformant |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | China | CID002318 | Conformant |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd. | China | CID002319 | Conformant |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd. | China | CID002320 | Conformant |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd. | China | CID002321 | Conformant |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd. | China | CID002494 | Conformant |
| Tungsten | Asia Tungsten Products Vietnam Ltd. | Viet Nam | CID002502 | Conformant |
| Tungsten | Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch | China | CID002513 | Conformant |
| Tungsten | H.C. Starck Tungsten GmbH | Germany | CID002541 | Conformant |
| Tungsten | TANIOBIS Smelting GmbH & Co. KG | Germany | CID002542 | Conformant |
| Tungsten | Masan High-Tech Materials | Viet Nam | CID002543 | Conformant |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd. | China | CID002551 | Conformant |

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| Tungsten | Niagara Refining LLC | United States Of America | CID002589 | Conformant |
| Tungsten | China Molybdenum Tungsten Co., Ltd. | China | CID002641 | Conformant |
| Tungsten | Ganzhou Haichuang Tungsten Co., Ltd. | China | CID002645 | Conformant |
| Tungsten | Hydrometallurg, JSC | Russian Federation | CID002649 | RMI Due Diligence Review - Unable to Proceed |
| Tungsten | Unecha Refractory metals plant | Russian Federation | CID002724 | Non Conformant |
| Tungsten | Philippine Chuangxin Industrial Co., Inc. | Philippines | CID002827 | Conformant |
| Tungsten | ACL Metais Eireli | Brazil | CID002833 | Non Conformant |
| Tungsten | Moliren Ltd. | Russian Federation | CID002845 | RMI Due Diligence Review - Unable to Proceed |
| Tungsten | Fujian Ganmin RareMetal Co., Ltd. | China | CID003401 | Conformant |
| Tungsten | Lianyou Metals Co., Ltd. | Taiwan, Province Of China | CID003407 | Conformant |
| Tungsten | JSC "Kirovgrad Hard Alloys Plant" | Russian Federation | CID003408 | RMI Due Diligence Review - Unable to Proceed |
| Tungsten | NPP Tyazhmetprom LLC | Russian Federation | CID003416 | RMI Due Diligence Review - Unable to Proceed |
| Tungsten | Hubei Green Tungsten Co., Ltd. | China | CID003417 | Conformant |

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| Tungsten | Albasteel Industria e Comercio de Ligas Para Fundicao Ltd. | Brazil | CID003427 | Non Conformant |
| Tungsten | Cronimet Brasil Ltda | Brazil | CID003468 | Conformant |
| Tungsten | Fujian Xinlu Tungsten Co., Ltd. | China | CID003609 | Conformant |
| Tungsten | OOO "Technolom" 2 | Russian Federation | CID003612 | RMI Due Diligence Review - Unable to Proceed |
| Tungsten | OOO "Technolom" 1 | Russian Federation | CID003614 | RMI Due Diligence Review - Unable to Proceed |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. | China | CID002313 | Communication Suspended - Not Interested |
| Tungsten | CNMC (Guangxi) PGMA Co., Ltd. | China | CID000281 | Outreach Required |
| Tungsten | Artek LLC | Russian Federation | CID003553 | RMI Due Diligence Review - Unable to Proceed |
| Tungsten | LLC Vostok | Russian Federation | CID003643 | RMI Due Diligence Review - Unable to Proceed |
| Tungsten | YUDU ANSHENG TUNGSTEN CO., LTD. | China | CID003662 | Outreach Required |
| Tungsten | HANNAE FOR T Co., Ltd. | Korea, Republic Of | CID003978 | Outreach Required |
| Tungsten | DONGKUK INDUSTRIES CO., LTD. | Korea, Republic Of | CID004060 | In Communication |

APPENDIX B - Countries of Origin

| Country of Origin | |
|----------------------------------|---------------|
| Afghanistan | Kazakhstan |
| Åland Islands | Kenya |
| Albania | Korea |
| American Samoa | Kyrgyzstan |
| Andorra | Liberia |
| Angola | Liechtenstein |
| Argentina | Lithuania |
| Armenia | Luxembourg |
| Aruba | Madagascar |
| Australia | Malaysia |
| Austria | Mali |
| Azerbaijan | Mauritania |
| Bahamas | Mexico |
| Barbados | Mongolia |
| Belarus | Morocco |
| Belgium | Mozambique |
| Benin | Myanmar |
| Bermuda | Namibia |
| Bolivia (Plurinational State of) | Netherlands |

| | |
|------------------------------|--------------------|
| Brazil | New Zealand |
| Bulgaria | Nicaragua |
| Burkina Faso | Niger |
| Burundi | Nigeria |
| Cambodia | Norway |
| Canada | Panama |
| Central African Republic | Papua New Guinea |
| Chile | Peru |
| China | Philippines |
| Colombia | Poland |
| Congo | Portugal |
| Czechia | Russian Federation |
| Democratic Republic of Congo | Rwanda |
| Djibouti | Samoa |
| Dominica | Saudi Arabia |
| Dominican Republic | Senegal |
| Ecuador | Sierra Leone |
| Egypt | Singapore |
| Eritrea | Slovakia |
| Estonia | Slovenia |

| | |
|-----------|----------------------|
| Ethiopia | South Africa |
| Finland | South Sudan |
| France | Spain |
| Georgia | Sudan |
| Germany | Suriname |
| Ghana | Sweden |
| Guam | Switzerland |
| Guatemala | Taiwan |
| Guinea | Tajikistan |
| Guyana | Tanzania |
| Honduras | Thailand |
| Hong Kong | Turkey |
| Hungary | Uganda |
| India | United Arab Emirates |
| Indonesia | United Kingdom |
| Ireland | United States |
| Israel | Uzbekistan |
| Italy | Viet Nam |
| Japan | Zambia |
| Jersey | Zimbabwe |
