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

FORM SD

SPECIALIZED DISCLOSURE REPORT
FREQUENCY ELECTRONICS, INC.

(Exact name of Registrant as specified in its charter)

Delaware
(State or other jurisdiction of
incorporation or organization)

1-8061
Commission File No.

11-1986657
(I.R.S. Employer Identification No.)

55 CHARLES LINDBERGH BLVD., MITCHEL FIELD, N.Y.
(Address of principal executive offices)

11553
(Zip Code)

Steven Bernstein **516-794-4500**
(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, 2018.

Section 1. Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

(c) Conflict Minerals Report

Frequency Electronics, Inc. (the “Company”) evaluated its current product lines and determined that certain products we manufacture contain tin, tungsten, tantalum and/or gold (3TG) necessary to the production or functionality of such products.

In accordance with Rule 13p-1 under the Securities Exchange Act of 1934, as amended, the instructions to Form SD, and the Public Statement on the Effect of the Recent Court of Appeals Decision on the Conflict Minerals Rule issued by the Director of the Division of Corporation Finance of the Securities and Exchange Commission on April 29, 2014, the Company is filing herewith a Conflict Minerals Report, which is attached as Exhibit 1.01 and incorporated herein by reference.

The Company’s Conflict Minerals Policy and this Form SD, including the Company’s Conflict Minerals Report provided as Exhibit 1.01 hereto, is publicly available at the Company’s website: www.frequelec.com under Investor Relations/Financial/SEC Filings. The content of our website as referred to in this Form SD is included for general information only and is not incorporated by reference into this Form SD.

Item 1.02 Exhibits

Exhibit 1.01 [Conflict Minerals Report](#)

Section 2. Exhibits

Item 2.01 Exhibits

Exhibit 1.01 – [Conflict Minerals Report as required by Items 1.01 and 1.02 of Form SD.](#)

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.

FREQUENCY ELECTRONICS, INC.
(Registrant)

Date: May 30, 2019

By: /s/ Steven Bernstein
Steven Bernstein
Chief Financial Officer

Frequency Electronics, Inc.
Conflict Minerals Report
For the Year Ended December 31, 2018

This Conflict Minerals Report for the year ended December 31, 2018 has been prepared by Frequency Electronics, Inc. (“Frequency” or the “Company,” “we,” “us,” or “our”) and is filed with the Securities and Exchange Commission (“SEC”) pursuant to Rule 13p-1 under the Securities Exchange Act of 1934, as amended (the “Rule”), on a consolidated basis, in accordance with the instructions to Form SD, as modified by the Public Statement on the Effect of the Recent Court of Appeals Decision on the Conflict Minerals Rule issued by the Director of the Division of Corporation Finance of the SEC on April 29, 2014 (the “SEC Statement”).

The Rule was adopted by the SEC to implement reporting and disclosure requirements related to conflict minerals as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act). The Rule imposes certain reporting obligations on SEC registrants whose manufactured products contain conflict minerals which are necessary to the functionality or production of their products. Conflict Minerals are defined as cassiterite, columbite-tantalite, gold, wolframite, and their derivatives, which are limited to tin, tantalum, tungsten, and gold (3TGs) for the purposes of this assessment. These requirements apply to registrants whatever the geographic origin of the conflict minerals and whether or not they fund armed conflict in the Democratic Republic of Congo or an adjoining country (collectively, the “Covered Countries”).

In accordance with the instructions to Form SD, as modified by the SEC Statement, this Report outlines the diligence measures undertaken by the Company to assess the source and chain of custody of necessary Conflict Minerals in its supply chain. This Report is not subject to an independent private sector audit in accordance with the instructions to Form SD and the guidance set forth in the SEC Statement.

1. Company Overview

Frequency designs, develops and manufactures high precision timing, frequency control and synchronization products for space and terrestrial applications. Frequency’s products are used in satellite payloads and in other commercial, government and military systems including C4ISR (“Command, Control, Communication, Computer, Intelligence, Security and Reconnaissance”), missiles, aircraft, GPS, secure radios, energy exploration and wireline and wireless communication networks. Frequency has received over 100 awards of excellence for achievements in providing high performance electronic assemblies for over 150 space and Department of Defense programs. The Company invests significant resources in research and development and strategic acquisitions world-wide to expand its capabilities and markets.

2. Products Overview

The Company’s largest business area is satellite payloads. We provide master timing systems, power converters, and frequency generation, synthesis and distribution systems. Frequency’s products are also incorporated into a variety of C5ISR, secure communications and electronic warfare systems, on ground-based, sea-borne and air-borne platforms.

Our commercial markets also include network infrastructure and other industrial uses. The Company’s products provide precise time distribution for communication networks. Based upon Frequency’s internal assessment, most of the electronic system and subsystem products that we manufacture contain one or more of the 3TGs that are necessary to their functionality or production (“Covered Products”).

3. Conflict Minerals Program & Policy

The Company has actively engaged with our customers and suppliers for several years with respect to the use of conflict minerals.

We adopted a Conflict Minerals Policy articulating our conflict minerals supply chain due diligence process and our commitment to our reporting obligations regarding conflict minerals. Our policy is available on our website <https://fregelec.com/vendors/>.

Reasonable Country of Origin Inquiry

To determine whether necessary 3TGs in our products originated in Covered Countries, we retained Assent Compliance (“Assent”), our third party service provider, to assist us in reviewing our supply chain. We provided a list composed of suppliers associated with the Covered Products to Assent for upload to the Assent Compliance Manager tool (“ACM”). We deemed it impractical to filter this list further to exclude some possibly irrelevant suppliers because we could not determine definitively the presence or absence of conflict minerals in all parts supplied to Frequency for our products.

Frequency utilized the Responsible Minerals Initiative’s Conflict Minerals Reporting Template (“CMRT”) to conduct a survey of all in scope suppliers. During the supplier survey, we contacted suppliers via the ACM. Assent requested that all suppliers complete a CMRT and included training and education to guide suppliers on best practices and the use of this template. Assent monitored and tracked all communications in the ACM for future reporting and transparency. Frequency directly contacted suppliers that were unresponsive to Assent’s communications during the diligence process and requested such suppliers to complete the CMRT form and submit such form to Assent. The use of the CMRT allowed for some elimination of irrelevant suppliers. We also periodically reviewed the supplier list to ensure that irrelevant or “out of scope” suppliers were removed from the survey process.

Our 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 1 and 2 are minimum requirements for the CMRT
 - If suppliers state (via Q1 and Q2) that their products do not contain 3TGs necessary to the function or production of said products, then no further information is required and no further data validation is completed.
- Question 3 – Do any of your 3TGs originate from the covered countries?
 - Any supplier that has any 3TGs from the covered countries, even 1 positive response from their supply chain must answer yes.
- Question 4 – Is 100% of the 3TGs in question from a recycled source?
- Question 5 – Have you received info from all relevant 3TGs Suppliers?
 - If you are not at 100%, then you cannot make definitive statements for Questions 3, 4 and 6
- Question 6 – Have you identified all your Smelters and refiners?
 - If the answer here is yes, then question 5 must be yes. This also impacts question 3.

All submitted forms are accepted and classified as valid or invalid so that data is still retained. Suppliers are contacted in regards to invalid forms and are encouraged to submit a valid form. Suppliers are also provided with guidance on how to correct these validation errors. As of May 13th, there were 8(eight) invalid supplier submissions that could not be corrected.

Assent compared the list of smelters and refiners provided in our suppliers’ responses to the lists of smelters maintained by the Responsible Minerals Initiative (“RMI”) and, if a supplier indicated that a facility was certified as conflict-free, confirmed that the facility was listed on RMI’s list of validated conflict-free smelters and refiners of 3TGs. Our suppliers identified a total of 317 smelters and refiners that appear on the lists maintained by RMI. Of these 317 smelters and refiners, 254 are validated as conflict-free by RMI or a cross-recognized initiative, and, based on information provided by RMI, a further 5 have agreed to undergo or are currently undergoing a third-party audit. Most of the CMRTs we received were made on a company or division level basis which did not allow us to identify which smelters or refiners listed by our suppliers actually processed the 3TGs contained in our products.

Based on the reasonable country of origin inquiry (“RCOI”), we had reason to believe that some of the 3TGs may have originated from the Covered Countries, therefore, in accordance with the Rule, we performed due diligence on the source and chain of custody of the conflict minerals in question.

4. Design of Our Due Diligence and Description of the Due Diligence Process

We designed our due diligence measures to conform, in all material respects, with the framework in The Organization for Economic Co-operation and Development (“OECD”) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the “Guidance”) and the related supplement on gold, and supplement on tin, tantalum and tungsten. The Guidance identifies five steps for due diligence that should be implemented and provides guidance as to how to achieve each step. We developed our due diligence process to address each of these five steps, namely:

1. Establishing strong company management systems;
2. Identifying and assessing risks in our supply chain;
3. Designing and implementing a strategy to respond to identified risks in our supply chain;
4. Utilizing independent third-party audits of supply chain diligence; and
5. Publicly reporting on our supply chain due diligence

We are a downstream supplier, many steps removed from the mining of 3TGs. A large number of suppliers, through multiple tiers of distribution, supply the components and materials integrated into our products. Furthermore, Frequency does not purchase raw ore or unrefined conflict minerals or make purchases from the Covered Countries. The origin of the conflict minerals cannot be determined with any certainty once the raw ores are smelted, refined and converted to ingots, bullion or other conflict mineral containing derivatives. The smelters and refiners consolidate raw ore and represent the best actors in the total supply chain to possess knowledge of the origin of the ores they procure.

The OECD Guidance specifies that the requirements for compliance should reflect a company’s position in the supply chain. In particular, the OECD Guidance states that the implementation of due diligence should be tailored to a company’s activities and relationships and that the nature and extent of due diligence may vary based on a company’s size, products, relationships with suppliers and other factors. Due to practical difficulties associated with supply chain complexities, the OECD Guidance advises that downstream companies exercise due diligence primarily by establishing controls over their immediate suppliers. Accordingly, we rely primarily on our “tier 1” (direct) suppliers to provide information with respect to the origin of the conflict minerals contained in the components and materials supplied to us.

Due Diligence Performed

1) Establish Strong Company Management Systems

Internal Compliance Team

Frequency established a cross-functional Conflict Minerals Compliance Team led by John Caufield, Vice President of Manufacturing, also comprising representatives from our purchasing, contracts, and finance teams. Subject matter experts from relevant functions such as purchasing, subcontracts, and engineering support this team. The Conflict Minerals Compliance Team is responsible for implementing our conflict minerals compliance strategy and briefing senior management about the results of our due diligence efforts.

The Company also uses Assent to assist us with evaluating supply chain information regarding 3TGs, identifying potential risks, and in the development and implementation of additional due diligence steps that we undertake with suppliers in regards to conflict minerals.

Control Systems

The Company expects all of its suppliers to have policies and procedures in place to ensure that any 3TGs used in the production of the products sold to Frequency are Democratic Republic of Congo (“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. We rely on our direct suppliers to provide information on the origin of the 3TGs contained in components and materials supplied to us – including sources of 3TGs that are supplied to them from lower tier suppliers.

Our supplier 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 Code of Conduct is provided to all direct suppliers and if a supplier does not meet the Company's requirements, the relationship with this supplier will be evaluated. Our Code of Conduct is reviewed annually to ensure it continues to align with industry best practices.

Supplier Engagement

The Company engages with suppliers directly to request that they complete a valid CMRT for the products that they supply to the Company. With respect to the OECD requirement to strengthen engagement with suppliers, the Company has developed an internal procedure that includes steps of supplier engagement escalation such as in-person 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 believes that the combination of the Code of Conduct, our Conflict Minerals Policy, and direct engagement with suppliers for 3TGs training and requests constitute a strong program when it comes to supplier engagement.

Maintain Records

The Company has adopted a policy to retain relevant documentation for a period of 5 years. We implemented a document retention policy through Assent to retain conflict minerals related documents, including supplier responses to CMRTs. We store all of the information and findings from this process in a database that can be audited by internal or external parties

2) Identifying and Assessing Risk in the Supply Chain

Due to our size, the complexity of our products, and the depth, breadth, and constant evolution of our supply chain, it is difficult to identify actors upstream from our direct suppliers. Risks are identified automatically in the ACM system based on criteria established for supplier responses in the system. These risks are addressed by Assent staff and members of our Conflict Minerals Compliance Team who contact the supplier, gather pertinent data and perform an assessment of the supplier's conflict minerals status.

One risk we identified with respect to the reporting period ended December 31st, 2018 related to the nature of the responses received. A large number of the responses received provided data at a company or divisional level or were unable to specify the smelters or refiners used for 3TGs in the components supplied to Frequency. 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.

In accordance with OECD Guidelines, it is important to identify and assess risks associated with conflict minerals in the supply chain. Risks were identified by assessing the due diligence practices 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 maintained by the RMI to ensure that the facilities met the RMI definition of a 3TGs processing facility that was operational during the 2018 calendar year.

In order to assess the risk that any of these smelters posed to our supply chain, 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"). We do not typically have a direct relationship with 3TGs smelters and refiners and do not perform or direct audits of these entities within our supply chain. In cases where the smelter's due diligence practices have not been audited against the RMAP standard, a potential supply chain risk exists.

As of May 27, 2019, we have validated 317 smelters or refiners and are working to validate the additional smelter/refiner entries from the submitted CMRTs. Due to the provision of primarily supplier-level CMRTs, we cannot definitely determine their connection to the Covered Products.

Each facility that meets the RMI definition of a smelter or refiner of a 3TGs 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.

As part of our risk management plan under the OECD Guidance, when facilities with red flags were reported on a CMRT by one of the suppliers surveyed, risk mitigation activities are initiated. Through Assent, submissions that include any red flag facilities immediately produce a receipt instructing the supplier to take their own risk mitigation actions, including submission of a product specific CMRT to better identify the connection to products that they supply to Frequency, and escalating up to removal of these red flag smelters from the supply chain.

As per the OECD Guidance, risk mitigation will depend on the supplier's specific context. Suppliers are given clear performance objectives within reasonable timeframes with the ultimate goal of progressive elimination of these red flags from the supply chain. In addition, suppliers are guided to the Assent University learning platform to engage in educational materials on mitigating the risk of smelters or refiners on the supply chain.

Additionally, suppliers are evaluated on program strength (further assisting in identifying risk in the supply chain). The criteria used to evaluate the strength of the program are based on these four questions in the CMRT:

Have you established a conflict minerals sourcing policy?

Have you implemented due diligence measures for conflict-free sourcing?

Do you review due diligence information received from your suppliers against your company's expectations?

Does your review process include corrective action management?

When suppliers meet or exceed those criteria, they are deemed to have a strong program. When suppliers do not meet those criteria, they are deemed to have a weak program. At this time, 17 of our responsive suppliers have been identified as having a weak program.

3) Design and Implement a Strategy to Respond to Risks

Together with Assent, we developed processes to assess and respond to the risks identified in our supply chain. In response to this risk assessment, Frequency 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 with the Rule.

We engage each of our suppliers that we have reason to believe are supplying us with 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.

4) Carry out Independent Third Party Audit of Supply Chain Due Diligence at Identified Points in the Supply Chain

We do not have a direct relationship with any 3TGs smelters or refiners and do not perform or direct audits of these entities within our supply chain. Instead, we rely on third-party audits of smelters and refiners conducted as part of the RMAP, which uses independent private sector auditors to audit 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. Frequency is a signatory of this communication in accordance with the requirements of downstream companies detailed in the OECD Guidance.

5) Public Reporting on Supply Chain Due Diligence

We have published our Form SD for the year ended December 31, 2018 and this report is in the Investor Relations section of our website at <https://fregelec.com/vendors/>. Information found on or accessed through our website is not considered part of this report and is not incorporated by reference herein. We have also publicly filed our Form SD and this report with the SEC.

Due Diligence Results

Survey Results

For the 2018 reporting year, Frequency received CMRT forms from 63.25% of the suppliers surveyed. All final CMRT submissions were reviewed and validated to ensure no inaccuracies or gaps in data were found. Eight of the suppliers were unable to correct their CMRT and as such, are still listed as invalid submissions.

Smelters and Refiners

Attached as Appendix A is a list of all of the smelters and refiners listed by our suppliers in their completed CMRTs that appear on the lists of smelters maintained by the RMI. Since many of the CMRTs we received from our suppliers were made on a company or division level basis, rather than on a product-level basis, we are not able to identify which smelters or refiners listed on Appendix A actually processed the 3TGs contained in our products. Therefore, our list of processing smelters and refiners disclosed in Appendix A may contain more facilities than those that actually processed the 3TGs contained in the Covered Products.

From the responses that we received, we identified 66 smelters that potentially posed a risk due to the presence of some red flag indicators. For suppliers that identified these specific smelters of concern on their CMRT, we created a new escalation plan. These suppliers were contacted by Assent and Frequency to evaluate whether or not these smelters could be connected to Frequency products. The suppliers were asked to complete a product-level CMRT, rather than a company-level CMRT, to better identify the connection to products that they supply to Frequency. 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.

Countries of Origin

Appendix B includes an aggregated list of the countries of origin from which the reported facilities collectively source conflict minerals, based on information provided by suppliers and the RMI. As mentioned in the above section, many responses were provided at the company level, therefore, Appendix B may contain more countries than those that are actually the sources of the 3TGs in the Covered Products.

Steps to be Taken to Mitigate Risk

We have taken or intend to take the following steps to improve the due diligence conducted to further mitigate any risk that the necessary 3TGs in the Covered Products could benefit armed groups in the Covered Countries:

- Work more closely with Assent to obtain CMRTs on a product-specific basis to enable us to determine which smelters and refiners actually process 3TGs contained in our products.
 - Engage with our suppliers more closely and provide suppliers with more information and training resources regarding responsible sourcing of 3TGs.
 - Encourage our 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.
 - Increase the emphasis on clean and validated smelter and refiner information from our supply chain as the list of conflict-free smelters and refiners grows and more smelters and refiners declare their intent to enroll in the program.
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Appendix A - Smelter list

- Includes: metal, smelter/refinery name, facility, location, smelter ID

| Metal | Smelter Name | Smelter Facility Location | Smelter ID |
|-------|---|---------------------------|------------|
| Gold | Abington Reldan Metals, LLC | UNITED STATES | CID002708 |
| Gold | Advanced Chemical Company | UNITED STATES | CID000015 |
| Gold | African Gold Refinery | UGANDA | CID003185 |
| Gold | Aida Chemical Industries Co., Ltd. | JAPAN | CID000019 |
| Gold | Al Etihad Gold LLC | UNITED ARAB EMIRATES | CID002560 |
| Gold | Allgemeine Gold-und Silberscheideanstalt A.G. | GERMANY | CID000035 |
| Gold | Almalyk Mining and Metallurgical Complex (AMMC) | UZBEKISTAN | CID000041 |
| Gold | AngloGold Ashanti Córrego do Sítio Mineração | BRAZIL | CID000058 |
| Gold | Argor-Heraeus S.A. | SWITZERLAND | CID000077 |
| Gold | Asahi Pretec Corp. | JAPAN | CID000082 |
| Gold | Asahi Refining Canada Ltd. | CANADA | CID000924 |
| Gold | Asahi Refining USA Inc. | UNITED STATES | CID000920 |
| Gold | Asaka Riken Co., Ltd. | JAPAN | CID000090 |
| Gold | Atasay Kuyumculuk Sanayi Ve Ticaret A.S. | TURKEY | CID000103 |
| Gold | AU Traders and Refiners | SOUTH AFRICA | CID002850 |
| Gold | Aurubis AG | GERMANY | CID000113 |
| Gold | Bangalore Refinery | INDIA | CID002863 |
| Gold | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | PHILIPPINES | CID000128 |
| Gold | Boliden AB | SWEDEN | CID000157 |
| Gold | C. Hafner GmbH + Co. KG | GERMANY | CID000176 |
| Gold | Caridad | MEXICO | CID000180 |
| Gold | CCR Refinery - Glencore Canada Corporation | CANADA | CID000185 |
| Gold | Cendres + Métaux S.A. | SWITZERLAND | CID000189 |
| Gold | CGR Metalloys Pvt Ltd. | INDIA | CID003382 |
| Gold | Chimet S.p.A. | ITALY | CID000233 |
| Gold | Chugai Mining | JAPAN | CID000264 |
| Gold | Daejin Indus Co., Ltd. | KOREA, REPUBLIC OF | CID000328 |
| Gold | Daye Non-Ferrous Metals Mining Ltd. | CHINA | CID000343 |
| Gold | Degussa Sonne / Mond Goldhandel GmbH | GERMANY | CID002867 |
| Gold | Dijllah Gold Refinery FZC | UNITED ARAB EMIRATES | CID003348 |
| Gold | DODUCO Contacts and Refining GmbH | GERMANY | CID000362 |
| Gold | Dowa | JAPAN | CID000401 |
| Gold | DS PRETECH Co., Ltd. | KOREA, REPUBLIC OF | CID003195 |
| Gold | DSC (Do Sung Corporation) | KOREA, REPUBLIC OF | CID000359 |
| Gold | Eco-System Recycling Co., Ltd. | JAPAN | CID000425 |
| Gold | Emirates Gold DMCC | UNITED ARAB EMIRATES | CID002561 |
| Gold | Fidelity Printers and Refiners Ltd. | ZIMBABWE | CID002515 |
| Gold | GCC Gujrat Gold Centre Pvt. Ltd. | INDIA | CID002852 |
| Gold | Geib Refining Corporation | UNITED STATES | CID002459 |
| Gold | Gold Refinery of Zijin Mining Group Co., Ltd. | CHINA | CID002243 |
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM | CHINA | CID001909 |
| Gold | Guangdong Jinding Gold Limited | CHINA | CID002312 |
| Gold | Guoda Safina High-Tech Environmental Refinery Co., Ltd. | CHINA | CID000651 |
| Gold | Hangzhou Fuchunjiang Smelting Co., Ltd. | CHINA | CID000671 |
| Gold | HeeSung | KOREA, REPUBLIC OF | CID000689 |
| Gold | Heimerle + Meule GmbH | GERMANY | CID000694 |
| Gold | Heraeus Metals Hong Kong Ltd. | CHINA | CID000707 |
| Gold | Heraeus Precious Metals GmbH & Co. KG | GERMANY | CID000711 |
| Gold | Hunan Chenzhou Mining Co., Ltd. | CHINA | CID000767 |
| Gold | Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd. | CHINA | CID000773 |
| Gold | Hwasung CJ Co., Ltd. | KOREA, REPUBLIC OF | CID000778 |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | CHINA | CID000801 |
| Gold | Ishifuku Metal Industry Co., Ltd. | JAPAN | CID000807 |
| Gold | Istanbul Gold Refinery | TURKEY | CID000814 |
| Gold | Italpreziosi | ITALY | CID002765 |
| Gold | Japan Mint | JAPAN | CID000823 |
| Gold | Jiangxi Copper Co., Ltd. | CHINA | CID000855 |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant | RUSSIAN FEDERATION | CID000927 |
| Gold | JSC Uralelectromed | RUSSIAN FEDERATION | CID000929 |
| Gold | JX Nippon Mining & Metals Co., Ltd. | JAPAN | CID000937 |
| Gold | Kaloti Precious Metals | UNITED ARAB EMIRATES | CID002563 |

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|------|---|--------------------------|-----------|
| Gold | Kazakhmys Smelting LLC | KAZAKHSTAN | CID000956 |
| Gold | Kazzinc | KAZAKHSTAN | CID000957 |
| Gold | Kennecott Utah Copper LLC | UNITED STATES | CID000969 |
| Gold | KGHM Polska Miedz Spolka Akcyjna | POLAND | CID002511 |
| Gold | Kojima Chemicals Co., Ltd. | JAPAN | CID000981 |
| Gold | Korea Zinc Co., Ltd. | KOREA, REPUBLIC OF | CID002605 |
| Gold | Kyrgyzaltyn JSC | KYRGYZSTAN | CID001029 |
| Gold | Kyshtym Copper-Electrolytic Plant ZAO | RUSSIAN FEDERATION | CID002865 |
| Gold | L'azurde Company For Jewelry | SAUDI ARABIA | CID001032 |
| Gold | Lingbao Gold Co., Ltd. | CHINA | CID001056 |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd. | CHINA | CID001058 |
| Gold | L'Orfebre S.A. | ANDORRA | CID002762 |
| Gold | LS-NIKKO Copper Inc. | KOREA, REPUBLIC OF | CID001078 |
| Gold | Luoyang Zijin Yinhui Gold Refinery Co., Ltd. | CHINA | CID001093 |
| Gold | Marsam Metals | BRAZIL | CID002606 |
| Gold | Materion | UNITED STATES | CID001113 |
| Gold | Matsuda Sangyo Co., Ltd. | JAPAN | CID001119 |
| Gold | Metalor Technologies (Hong Kong) Ltd. | CHINA | CID001149 |
| Gold | Metalor Technologies (Singapore) Pte., Ltd. | SINGAPORE | CID001152 |
| Gold | Metalor Technologies (Suzhou) Ltd. | CHINA | CID001147 |
| Gold | Metalor Technologies S.A. | SWITZERLAND | CID001153 |
| Gold | Metalor USA Refining Corporation | UNITED STATES | CID001157 |
| Gold | Metalúrgica Met-Mex Peñoles S.A. De C.V. | MEXICO | CID001161 |
| Gold | Mitsubishi Materials Corporation | JAPAN | CID001188 |
| Gold | Mitsui Mining and Smelting Co., Ltd. | JAPAN | CID001193 |
| Gold | MMTC-PAMP India Pvt., Ltd. | INDIA | CID002509 |
| Gold | Modeltech Sdn Bhd | MALAYSIA | CID002857 |
| Gold | Morris and Watson | NEW ZEALAND | CID002282 |
| Gold | Morris and Watson Gold Coast | AUSTRALIA | CID002866 |
| Gold | Moscow Special Alloys Processing Plant | RUSSIAN FEDERATION | CID001204 |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.ª. | TURKEY | CID001220 |
| Gold | Navoi Mining and Metallurgical Combinat | UZBEKISTAN | CID001236 |
| Gold | NH Recytech Company | KOREA, REPUBLIC OF | CID003189 |
| Gold | Nihon Material Co., Ltd. | JAPAN | CID001259 |
| Gold | Ögussa Österreichische Gold- und Silber-Scheideanstalt GmbH | AUSTRIA | CID002779 |
| Gold | Ohura Precious Metal Industry Co., Ltd. | JAPAN | CID001325 |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | RUSSIAN FEDERATION | CID001326 |
| Gold | OJSC Novosibirsk Refinery | RUSSIAN FEDERATION | CID000493 |
| Gold | PAMP S.A. | SWITZERLAND | CID001352 |
| Gold | Pease & Curren | UNITED STATES | CID002872 |
| Gold | Penglai Penggang Gold Industry Co., Ltd. | CHINA | CID001362 |
| Gold | Planta Recuperadora de Metales SpA | CHILE | CID002919 |
| Gold | Prioksky Plant of Non-Ferrous Metals | RUSSIAN FEDERATION | CID001386 |
| Gold | PT Aneka Tambang (Persero) Tbk | INDONESIA | CID001397 |
| Gold | PX Précinox S.A. | SWITZERLAND | CID001498 |
| Gold | QG Refining, LLC | UNITED STATES OF AMERICA | CID003324 |
| Gold | Rand Refinery (Pty) Ltd. | SOUTH AFRICA | CID001512 |
| Gold | Refinery of Seemine Gold Co., Ltd. | CHINA | CID000522 |
| Gold | Remondis Argentia B.V. | NETHERLANDS | CID002582 |
| Gold | Republic Metals Corporation | UNITED STATES | CID002510 |
| Gold | Royal Canadian Mint | CANADA | CID001534 |
| Gold | SAAMP | FRANCE | CID002761 |
| Gold | Sabin Metal Corp. | UNITED STATES | CID001546 |
| Gold | Safimet S.p.A | Italy | CID002973 |
| Gold | SAFINA A.S. | CZECH REPUBLIC | CID002290 |
| Gold | Sai Refinery | INDIA | CID002853 |
| Gold | Samduck Precious Metals | KOREA, REPUBLIC OF | CID001555 |
| Gold | SAMWON Metals Corp. | KOREA, REPUBLIC OF | CID001562 |
| Gold | SAXONIA Edelmetalle GmbH | GERMANY | CID002777 |
| Gold | SEMPSA Joyería Platería S.A. | SPAIN | CID001585 |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | CHINA | CID001619 |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd. | CHINA | CID001622 |
| Gold | Sichuan Tianze Precious Metals Co., Ltd. | CHINA | CID001736 |
| Gold | Singway Technology Co., Ltd. | TAIWAN | CID002516 |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals | RUSSIAN FEDERATION | CID001756 |
| Gold | Solar Applied Materials Technology Corp. | TAIWAN | CID001761 |
| Gold | Sovereign Metals | INDIA | CID003383 |

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| Gold | State Research Institute Center for Physical Sciences and Technology | LITHUANIA | CID003153 |
| Gold | Sudan Gold Refinery | SUDAN | CID002567 |
| Gold | Sumitomo Metal Mining Co., Ltd. | JAPAN | CID001798 |
| Gold | SungEel HiTech | KOREA, REPUBLIC OF | CID002918 |
| Gold | T.C.A S.p.A | ITALY | CID002580 |
| Gold | Tanaka Kikinzoku Kogyo K.K. | JAPAN | CID001875 |
| Gold | The Refinery of Shandong Gold Mining Co., Ltd. | CHINA | CID001916 |
| Gold | Tokuriki Honten Co., Ltd. | JAPAN | CID001938 |
| Gold | Tongling Nonferrous Metals Group Co., Ltd. | CHINA | CID001947 |
| Gold | Tony Goetz NV | BELGIUM | CID002587 |
| Gold | TOO Tau-Ken-Altyn | KAZAKHSTAN | CID002615 |
| Gold | Torecom | KOREA, REPUBLIC OF | CID001955 |
| Gold | Umicore Brasil Ltda. | BRAZIL | CID001977 |
| Gold | Umicore Precious Metals Thailand | THAILAND | CID002314 |
| Gold | Umicore S.A. Business Unit Precious Metals Refining | BELGIUM | CID001980 |
| Gold | United Precious Metal Refining, Inc. | UNITED STATES | CID001993 |
| Gold | Universal Precious Metals Refining Zambia | ZAMBIA | CID002854 |
| Gold | Valcambi S.A. | SWITZERLAND | CID002003 |
| Gold | Western Australian Mint trading as The Perth Mint | AUSTRALIA | CID002030 |
| Gold | WIELAND Edelmetalle GmbH | GERMANY | CID002778 |
| Gold | Yamamoto Precious Metal Co., Ltd. | JAPAN | CID002100 |
| Gold | Yokohama Metal Co., Ltd. | JAPAN | CID002129 |
| Gold | Yunnan Copper Industry Co., Ltd. | CHINA | CID000197 |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | CHINA | CID002224 |
| Tantalum | Asaka Riken Co., Ltd. | JAPAN | CID000092 |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd. | CHINA | CID000211 |
| Tantalum | CP Metals Inc. | UNITED STATES OF AMERICA | CID003402 |
| Tantalum | D Block Metals, LLC | UNITED STATES | CID002504 |
| Tantalum | Exotech Inc. | UNITED STATES | CID000456 |
| Tantalum | F&X Electro-Materials Ltd. | CHINA | CID000460 |
| Tantalum | FIR Metals & Resource Ltd. | CHINA | CID002505 |
| Tantalum | Global Advanced Metals Aizu | JAPAN | CID002558 |
| Tantalum | Global Advanced Metals Boyertown | UNITED STATES | CID002557 |
| Tantalum | Guangdong Rising Rare Metals-EO Materials Ltd. | CHINA | CID000291 |
| Tantalum | Guangdong Zhiyuan New Material Co., Ltd. | CHINA | CID000616 |
| Tantalum | H.C. Starck Co., Ltd. | THAILAND | CID002544 |
| Tantalum | H.C. Starck Hermsdorf GmbH | GERMANY | CID002547 |
| Tantalum | H.C. Starck Inc. | UNITED STATES | CID002548 |
| Tantalum | H.C. Starck Ltd. | JAPAN | CID002549 |
| Tantalum | H.C. Starck Smelting GmbH & Co. KG | GERMANY | CID002550 |
| Tantalum | H.C. Starck Tantalum and Niobium GmbH | GERMANY | CID002545 |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd. | CHINA | CID002492 |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd. | CHINA | CID002512 |
| Tantalum | Jiangxi Tuohong New Raw Material | CHINA | CID002842 |
| Tantalum | Jiujiang Janny New Material Co., Ltd. | CHINA | CID003191 |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd. | CHINA | CID000914 |
| Tantalum | Jiujiang Tanbre Co., Ltd. | CHINA | CID000917 |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd. | CHINA | CID002506 |
| Tantalum | KEMET Blue Metals | MEXICO | CID002539 |
| Tantalum | KEMET Blue Powder | UNITED STATES | CID002568 |
| Tantalum | LSM Brasil S.A. | BRAZIL | CID001076 |
| Tantalum | Metallurgical Products India Pvt., Ltd. | INDIA | CID001163 |
| Tantalum | Mineracao Taboca S.A. | BRAZIL | CID001175 |
| Tantalum | Mitsui Mining and Smelting Co., Ltd. | JAPAN | CID001192 |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd. | CHINA | CID001277 |
| Tantalum | NPM Silmet AS | ESTONIA | CID001200 |
| Tantalum | Power Resources Ltd. | MACEDONIA | CID002847 |
| Tantalum | QuantumClean | UNITED STATES | CID001508 |
| Tantalum | Resind Industria e Comercio Ltda. | BRAZIL | CID002707 |
| Tantalum | RFH Tantalum Smeltry Co., Ltd. | CHINA | CID001522 |
| Tantalum | Solikamsk Magnesium Works OAO | RUSSIAN FEDERATION | CID001769 |
| Tantalum | Taki Chemicals | JAPAN | CID001869 |
| Tantalum | Telex Metals | UNITED STATES | CID001891 |
| Tantalum | Ulba Metallurgical Plant JSC | KAZAKHSTAN | CID001969 |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd. | CHINA | CID002508 |
| Tin | Alpha | UNITED STATES | CID000292 |
| Tin | An Vinh Joint Stock Mineral Processing Company | VIET NAM | CID002703 |
| Tin | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | CHINA | CID000228 |

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| Tin | Chifeng Dajingzi Tin Industry Co., Ltd. | CHINA | CID003190 |
| Tin | China Tin Group Co., Ltd. | CHINA | CID001070 |
| Tin | CV Ayi Jaya | INDONESIA | CID002570 |
| Tin | CV Dua Sekawan | INDONESIA | CID002592 |
| Tin | CV Gita Pesona | INDONESIA | CID000306 |
| Tin | CV Tiga Sekawan | INDONESIA | CID002593 |
| Tin | CV United Smelting | INDONESIA | CID000315 |
| Tin | CV Venus Inti Perkasa | INDONESIA | CID002455 |
| Tin | Dowa | JAPAN | CID000402 |
| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | VIET NAM | CID002572 |
| Tin | EM Vinto | BOLIVIA | CID000438 |
| Tin | Estanho de Rondônia S.A. | BRAZIL | CID000448 |
| Tin | Fenix Metals | POLAND | CID000468 |
| Tin | Gejiu Fengming Metallurgy Chemical Plant | CHINA | CID002848 |
| Tin | Gejiu Kai Meng Industry and Trade LLC | CHINA | CID000942 |
| Tin | Gejiu Non-Ferrous Metal Processing Co., Ltd. | CHINA | CID000538 |
| Tin | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | CHINA | CID001908 |
| Tin | Gejiu Zili Mining And Metallurgy Co., Ltd. | CHINA | CID000555 |
| Tin | Guangdong Hanhe Non-ferrous Metal Limited Company | CHINA | CID003116 |
| Tin | Guanyang Guida Nonferrous Metal Smelting Plant | CHINA | CID002849 |
| Tin | HuiChang Hill Tin Industry Co., Ltd. | CHINA | CID002844 |
| Tin | Huichang Jinshunda Tin Co., Ltd. | CHINA | CID000760 |
| Tin | Jiangxi New Nanshan Technology Ltd. | CHINA | CID001231 |
| Tin | Magnu's Minerais Metais e Ligas Ltda. | BRAZIL | CID002468 |
| Tin | Malaysia Smelting Corporation (MSC) | MALAYSIA | CID001105 |
| Tin | Melt Metais e Ligas S.A. | BRAZIL | CID002500 |
| Tin | Metallic Resources, Inc. | UNITED STATES | CID001142 |
| Tin | Metallo Belgium N.V. | BELGIUM | CID002773 |
| Tin | Metallo Spain S.L.U. | SPAIN | CID002774 |
| Tin | Mineracao Taboca S.A. | BRAZIL | CID001173 |
| Tin | Minsur | PERU | CID001182 |
| Tin | Mitsubishi Materials Corporation | JAPAN | CID001191 |
| Tin | Modeltech Sdn Bhd | MALAYSIA | CID002858 |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company | VIET NAM | CID002573 |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd. | THAILAND | CID001314 |
| Tin | O.M. Manufacturing Philippines, Inc. | PHILIPPINES | CID002517 |
| Tin | Operaciones Metalurgical S.A. | BOLIVIA | CID001337 |
| Tin | Pongpipat Company Limited | MYANMAR | CID003208 |
| Tin | PT Aries Kencana Sejahtera | INDONESIA | CID000309 |
| Tin | PT Artha Cipta Langgeng | INDONESIA | CID001399 |
| Tin | PT ATD Makmur Mandiri Jaya | INDONESIA | CID002503 |
| Tin | PT Babel Inti Perkasa | INDONESIA | CID001402 |
| Tin | PT Babel Surya Alam Lestari | INDONESIA | CID001406 |
| Tin | PT Bangka Prima Tin | INDONESIA | CID002776 |
| Tin | PT Bangka Serumpun | INDONESIA | CID003205 |
| Tin | PT Bangka Tin Industry | INDONESIA | CID001419 |
| Tin | PT Belitung Industri Sejahtera | INDONESIA | CID001421 |
| Tin | PT Bukit Timah | INDONESIA | CID001428 |
| Tin | PT DS Jaya Abadi | INDONESIA | CID001434 |
| Tin | PT Inti Stania Prima | INDONESIA | CID002530 |
| Tin | PT Kijang Jaya Mandiri | INDONESIA | CID002829 |
| Tin | PT Menara Cipta Mulia | INDONESIA | CID002835 |
| Tin | PT Mitra Stania Prima | INDONESIA | CID001453 |
| Tin | PT Panca Mega Persada | INDONESIA | CID001457 |
| Tin | PT Premium Tin Indonesia | INDONESIA | CID000313 |
| Tin | PT Prima Timah Utama | INDONESIA | CID001458 |
| Tin | PT Refined Bangka Tin | INDONESIA | CID001460 |
| Tin | PT Sariwiguna Binasentosa | INDONESIA | CID001463 |
| Tin | PT Stanindo Inti Perkasa | INDONESIA | CID001468 |
| Tin | PT Sukses Inti Makmur | INDONESIA | CID002816 |
| Tin | PT Sumber Jaya Indah | INDONESIA | CID001471 |
| Tin | PT Timah (Persero) Tbk Kundur | INDONESIA | CID001477 |
| Tin | PT Timah (Persero) Tbk Mentok | INDONESIA | CID001482 |
| Tin | PT Tinindo Inter Nusa | INDONESIA | CID001490 |
| Tin | PT Tirus Putra Mandiri | INDONESIA | CID002478 |
| Tin | PT Tommy Utama | INDONESIA | CID001493 |
| Tin | Resind Industria e Comercio Ltda. | BRAZIL | CID002706 |

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| Tin | Rui Da Hung | TAIWAN | CID001539 |
| Tin | Soft Metais Ltda. | BRAZIL | CID001758 |
| Tin | Super Ligas | Brazil | CID002756 |
| Tin | Thaisarco | THAILAND | CID001898 |
| Tin | Tin Technology & Refining | UNITED STATES OF AMERICA | CID003325 |
| Tin | Tuyen Quang Non-Ferrous Metals Joint Stock Company | VIET NAM | CID002574 |
| Tin | White Solder Metalurgia e Mineração Ltda. | BRAZIL | CID002036 |
| Tin | Yunnan Chengfeng Non-ferrous Metals Co., Ltd. | CHINA | CID002158 |
| Tin | Yunnan Tin Company Limited | CHINA | CID002180 |
| Tungsten | A.L.M.T. TUNGSTEN Corp. | JAPAN | CID000004 |
| Tungsten | ACL Metais Eireli | BRAZIL | CID002833 |
| Tungsten | Asia Tungsten Products Vietnam Ltd. | VIET NAM | CID002502 |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd. | CHINA | CID002513 |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd. | CHINA | CID000258 |
| Tungsten | CNMC (Guangxi) PGMA Co., Ltd. | CHINA | CID000281 |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd. | CHINA | CID000499 |
| Tungsten | Ganzhou Haichuang Tungsten Co., Ltd. | CHINA | CID002645 |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd. | CHINA | CID000875 |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd. | CHINA | CID002315 |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd. | CHINA | CID002494 |
| Tungsten | Ganzhou Yatai Tungsten Co., Ltd. | CHINA | CID002536 |
| Tungsten | Global Tungsten & Powders Corp. | UNITED STATES | CID000568 |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd. | CHINA | CID000218 |
| Tungsten | H.C. Starck Smelting GmbH & Co.KG | GERMANY | CID002542 |
| Tungsten | H.C. Starck Tungsten GmbH | GERMANY | CID002541 |
| Tungsten | Hunan Chenzhou Mining Co., Ltd. | CHINA | CID000766 |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji | CHINA | CID002579 |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd. | CHINA | CID000769 |
| Tungsten | Hunan Litian Tungsten Industry Co., Ltd. | CHINA | CID003182 |
| Tungsten | Hydrometallurg, JSC | RUSSIAN FEDERATION | CID002649 |
| Tungsten | Japan New Metals Co., Ltd. | JAPAN | CID000825 |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd. | CHINA | CID002551 |
| Tungsten | Jiangxi Dayu Longxintai Tungsten Co., Ltd. | CHINA | CID002647 |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd. | CHINA | CID002321 |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. | CHINA | CID002313 |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | CHINA | CID002318 |
| Tungsten | Jiangxi Xincheng Tungsten Industry Co., Ltd. | CHINA | CID002317 |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd. | CHINA | CID002316 |
| Tungsten | Kennametal Fallon | UNITED STATES | CID000966 |
| Tungsten | Kennametal Huntsville | UNITED STATES | CID000105 |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd. | CHINA | CID002319 |
| Tungsten | Moliren Ltd | RUSSIAN FEDERATION | CID002845 |
| Tungsten | Niagara Refining LLC | UNITED STATES | CID002589 |
| Tungsten | Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC | VIET NAM | CID002543 |
| Tungsten | Philippine Chuangxin Industrial Co., Inc. | PHILIPPINES | CID002827 |
| Tungsten | South-East Nonferrous Metal Company Limited of Hengyang City | CHINA | CID002815 |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd. | VIET NAM | CID001889 |
| Tungsten | Unecha Refractory metals plant | RUSSIAN FEDERATION | CID002724 |
| Tungsten | Wolfram Bergbau und Hütten AG | AUSTRIA | CID002044 |
| Tungsten | Woltech Korea Co., Ltd. | KOREA, REPUBLIC OF | CID002843 |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd. | CHINA | CID002320 |
| Tungsten | Xiamen Tungsten Co., Ltd. | CHINA | CID002082 |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd. | CHINA | CID002830 |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd. | CHINA | CID002095 |

Appendix B - Countries of origin

- Includes: list of countries that declared smelters are known to source from

Argentina, Australia, Austria, Benin, Bolivia (Plurinational State of), Brazil, Burkina Faso, Burundi, Cambodia, Canada, Chile, China, Colombia, Democratic Republic of the Congo, Ecuador, Eritrea, Ethiopia, France, Germany, Ghana, Guatemala, Guinea, Guyana, Honduras, India, Indonesia, Japan, Kazakhstan, Laos, Madagascar, Malaysia, Mali, Mexico, Mongolia, Mozambique, Myanmar, Namibia, Nicaragua, Nigeria, Panama, Peru, Portugal, Russian Federation, Rwanda, Senegal, Sierra Leone, South Africa, Spain, Thailand, Togo, Uganda, United Kingdom of Great Britain and Northern Ireland, United States of America, Uzbekistan, Vietnam, and Zimbabwe