## UNITED STATES SECURITIES AND EXCHANGE COMMISSION

WASHINGTON, D.C. 20549

## Form SD

**Specialized Disclosure Report** 

# **Analog Devices, Inc.**

(Exact name of registrant as specified in its charter)

Massachusetts

(State or other jurisdiction of incorporation or organization)

1-7819 (Commission File No.)

One Analog Way, Wilmington, MA

(Address of principal executive offices)

(Zip Code) 781-329-4700

04-2348234

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

01887

Margaret Seif Chief People Officer and Chief Legal Officer

(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:

Z Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2020.

#### Section 1 - Conflict Minerals Disclosure

Item 1.01 - Conflict Minerals Disclosure and Report Item 1.02 - Exhibit

#### **Conflict Minerals Disclosure**

Analog Devices, Inc. has filed a Conflict Minerals Report (the "Report") as Exhibit 1.01 hereto. The Report is publicly available at www.analog.com under the heading "Investor Relations." The content of any website referred to in this Form SD and/or the Report is included for general information only and is not incorporated by reference in this Form SD and/or the Report.

#### Section 2 - Exhibits

#### Item 2.01 Exhibits

Exhibit 1.01 - <u>Conflict Minerals Report</u> as required by Items 1.01 and 1.02 of this Form.

### 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.

Analog Devices, Inc. (registrant)

/s/ Prashanth Mahendra-Rajah Prashanth Mahendra-Rajah Senior Vice President, Finance and Chief Financial Officer Dated: May 26, 2021

#### CONFLICT MINERALS REPORT OF ANALOG DEVICES, INC. IN ACCORDANCE WITH RULE 13P-1 UNDER THE SECURITIES EXCHANGE ACT OF 1934 (UNAUDITED)

#### **Section 1: Introduction**

This is the Conflict Minerals Report of Analog Devices, Inc. ("Analog Devices", "ADI", "we", "our") for calendar year 2020 in accordance with Rule 13p-1 under the Securities Exchange Act of 1934 ("Rule 13p-1"). Numerous terms in this Report are defined in Rule 13p-1 and Form SD and the reader is referred to those sources for such definitions and explanations thereof.

The scope of this report applies to Integrated Circuit (ICs), Assembled Products, and Evaluation Boards (collectively, the "Products"). Such Products may contain tantalum, tin, tungsten and/or gold (collectively, "conflict minerals") that are necessary to the functionality or production of products manufactured or contracted to be manufactured by Analog Devices. Based on the Reasonable Country of Origin Inquiry described below, Analog Devices either knows that necessary conflict minerals originated in the Democratic Republic of the Congo or an adjoining country (collectively, "Covered Countries") and are not from recycled or scrap sources, or has reason to believe that necessary conflict minerals may have originated in the Covered Countries and has reason to believe that they may not be from recycled or scrap sources. Accordingly, we undertook due diligence to determine whether the necessary conflict minerals in the Products did originate or may have originated in the Covered Countries.

Analog Devices is many steps removed from the mining of the conflict minerals; we do not purchase raw ore or unrefined conflict minerals, and we do no purchasing in the Covered Countries. We either purchase conflict minerals indirectly from a smelter or refiner (SOR) for use in our manufacturing processes or purchase components from suppliers that incorporate conflict minerals. The mine or other point of origin of 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. SORs are consolidating points for raw ore and are therefore in the best position in the total supply chain to know the origin of the ores. Our due diligence measures were based on multi-industry initiatives with the SORs of conflict minerals who provide those conflict minerals to Analog Devices' suppliers.

#### Section 1.1: Company Overview

Analog Devices is a leading global high-performance analog, technology company. Since our inception in 1965, we have focused on solving our customers' toughest signal processing engineering challenges and playing a fundamental role in efficiently converting, conditioning, and processing real-world phenomena such as temperature, pressure, sound, light, speed and motion into electrical signals to be used in a wide array of electronic applications. We produce innovative products and technologies that accurately sense, measure, connect, interpret and power, allowing our customers to intelligently bridge the physical and digital domains.

We design, manufacture and market a broad portfolio of solutions, including ICs, algorithms, software, and subsystems that leverage highperformance analog, mixed-signal and digital signal processing technologies. Our fusion of cutting-edge sensors, data converters, amplifiers and linear products, radio frequency (RF) ICs, power management products, and other signal processing products with deep industry expertise allows us to create robust technology platforms that meet a broad spectrum of customer and market needs. As new generations of applications evolve, such as autonomous vehicles, 5G networks, intelligent factories, and smart healthcare devices - the demand for Analog Devices' high-performance analog signal processing and digital signal processing (DSP) products and technologies is increasing.

We focus on key strategic markets such as industrial, automotive, consumer, and communications where our signal processing technology is often a critical differentiator in our customers' products.

#### **Section 1.2 Principal Products**

We design, manufacture and market a broad line of high-performance ICs that incorporate analog, mixed-signal and digital signal processing technologies. Our ICs are designed to address a wide range of real-world signal processing applications. We sell our ICs to tens of thousands of customers worldwide, many of whom use products spanning our core technologies in a wide range of applications. Our IC product portfolio includes both general-purpose products used by a broad range of customers and applications, as well as application-specific products designed for specific clusters of customers in key target markets. By using readily available, high-performance, general-purpose products in their systems, our customers can reduce the time they need to bring new products to market. Given the high cost of developing more customized ICs, our standard products often provide a cost-effective solution for many low to medium volume applications. We also focus on working with leading customers to design application-specific solutions. We begin with our existing core technologies, which leverage our data conversion, amplification, RF and microwave, on micro-electro mechanical systems (MEMS), power management and DSP capabilities, and devise a solution to more closely meet the needs of a specific customer or group of customers. Because we have already developed the core technology platform for our general-purpose products, we can create application-specific solutions quickly.

We produce and market a broad range of ICs and operate in one reportable segment based on the aggregation of eight operating segments. The ICs sold by each of our operating segments are manufactured using similar semiconductor manufacturing processes and raw materials in either our own production facilities or by third-party wafer fabricators using proprietary processes.

#### Section 2: Conflict Minerals Policy

Analog Devices has adopted a Conflict Minerals Policy. The ADI Conflict Minerals Policy is publicly available on our website (http://www.analog.com/media/en/Other/About-ADI/Sustainability/Analog\_Devices\_Conflict\_Minerals\_Policy\_Statement.pdf) and is a key component of our conflict minerals program framework systems. This policy:

- reflects ADI's commitment to ethical practices and compliance with applicable laws and regulations,
- includes ADI's actions to collaborate with other concerned electronics companies, under the Responsible Minerals Initiative (RMI), in developing methods to track the origin of conflict minerals used in the manufacture of electronic products,
- reflects ADI's support of the Responsible Minerals Assurance Process (RMAP) in assessing activities, processes, and systems used by the SOR facility to conduct upstream supply chain due diligence of minerals for conflict-affected and high-risk areas,
- is communicated to ADI's supply chain with the expectation of compliance with the conflict minerals policy, and for the suppliers to provide sourcing information using the RMI Conflict Minerals Reporting Template (RMI CMRT) as a standard, and

• provides a dedicated email address (conflictminerals@analog.com) for any questions or feedback from the supply chain.

#### Section 3: Conflict Minerals Team

An internal team is tasked to implement our Conflict Minerals Policy and oversee ADI's conflict minerals program. The Director of Environmental, Health, & Safety (EH&S), who reports to the Senior Vice President of Global Operations and Technology, is the assigned team leader and is supported by representatives from different functional groups.

The Conflict Minerals Team reports the program's conformance status quarterly to the Senior Vice President of Global Operations and Technology.

#### Section 4: Reasonable Country of Origin Inquiry (RCOI)

Analog Devices engaged with our relevant suppliers to identify the SORs in our supply chain. We define relevant suppliers as those who supply materials to Analog Devices that are known to contain any or all of the conflict minerals and that end up in our final products, where such conflict minerals are necessary to the functionality and/or production of the products. We utilized an online platform to reach out to our relevant suppliers to request conflict minerals sourcing information using the RMI Conflict Minerals Reporting Template (RMI CMRT). Information provided by our relevant suppliers is reviewed for completeness and reasonableness, based on our knowledge of the supplier. If necessary, assessment reports were created to outline additional actions needed from suppliers regarding their submission, including but not limited to follow-up and escalation.

#### Section 5: Due Diligence

A. Design of Analog Devices' due diligence framework

Analog Devices designed our due diligence measures to conform, in all material respects, with the internationally recognized due diligence framework in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition (OECD 2016) ("OECD Framework"), including related supplements for each of the conflict minerals.

B. Description of Analog Devices' due diligence measures performed with respect to products manufactured during 2020

Analog Devices' due diligence measures performed with respect to products manufactured during 2020 included:

- Comparing the SORs identified by relevant suppliers via the CMRT against the RMI list of SOR facilities that have received a "conformant" designation for conflict minerals by participating in an independent third-party SOR audit. We also validated the SOR's status using RMI's Active Smelters and Refiners List.
- Gathering more information on SORs that are not listed on the references mentioned above by working with the SOR directly, contacting the SOR indirectly through our suppliers, or conducting internet research. If the result of this data collection process indicates that the SOR is legitimately processing conflict minerals, we forward the SOR information to RMI

for further research. If, however, the result reveals that the SOR is not legitimate, we work with our supplier to conduct additional research on the SOR and to obtain information indicating that it is legitimate, otherwise, the supplier is asked to remove the alleged SOR from the supplier CMRT.

- Reaching out directly to SORs who are no longer certified as conformant by a recognized certification program to gather information regarding their plans of recertification, or lack thereof. If the SOR decided not to pursue recertification, we will ask our supplier to discontinue engagement with the SOR.
- Reaching out directly to the RMI to gather additional information regarding questionable SORs. These include but are not limited to SORs who have been on the Active list (i.e., SORs who have been in the audit process but have not completed it) for more than 6 months, SORs whose certification status have expired, or newly added SORs.
- Working with our suppliers to strongly encourage SORs in our supply chain to participate in the RMAP or a similar program and to cease sourcing from SORs who decline to participate in a RMAP or similar program.
- Reaching out directly to SORs to encourage their participation in the RMAP or a similar program.
- Collaborating with suppliers to ensure accuracy of information being passed down the supply chain.
- Pursuing non-responsive suppliers to obtain a CMRT. Suppliers who failed to provide survey information were escalated to our
  purchasing group and the supplier's management group. We will take measures up to and including termination of our
  relationship with the supplier, if warranted.
- Continuing our capacity building efforts by educating new members of our Procurement Team and other departments engaged in implementing our due diligence measures.
- Expanding the scope of our responsible sourcing program by including other minerals and geographies in our conflict minerals supplier survey.

#### Section 6: Risk Management Plan

The OECD guidelines for managing risk are largely directed towards the upstream portion of the supply chain (SORs and mines of origin). Nevertheless, ADI as a downstream company in the supply chain, participates in the RMAP under the RMI consortium to identify and review the due diligence process of the SORs in the supply chain. RMI assesses and audits whether the SORs adhere to the due diligence measures per the OECD Guidance; compliant SORs are then designated as "conformant" and listed as such on the RMI website.

Our Risk Mitigation process includes the following:

- In the event that a supplier reports on the RMI Conflict Minerals Reporting Template or it is discovered that the SOR has used conflict minerals sourced from mines that support armed conflict in the Covered Countries, then we work with the SOR to obtain its agreement to take steps to rectify the situation, including implementing corrective action to discontinue the use of non-DRC conflict free minerals in products supplied for ADI products, in an agreed upon timeframe. Should the SOR fail to mitigate the issue, ADI will discontinue engagement with the SOR.
- ADI will continue to work with our suppliers and with RMI to encourage SORs who have not yet obtained the "conformant" designation to do so.

Findings, including the number of SORs which are designated as conformant and suppliers which reported conformant status of all its SORs during the preceding quarter relative to the total number of SORs and suppliers in the ADI supply chain, the number of SORs whose sources of minerals are undeterminable, and any supplier reporting use of minerals sourced from conflict mines are reported to the Senior Vice President of Global Operations and Technology and staff members quarterly.

The SORs used in our single component products are 100% conformant and we are working towards the same status for our multiple component products.

The responses from our suppliers listed 318 entities as SORs of conflict minerals in their supply chains. A recognized responsible minerals assurance process verified 237 of these entities as conformant. The following is a summary of the SORs used by our suppliers broken out by mineral type:

| Metal    | Total Known SORs Used | Conformant SORs |
|----------|-----------------------|-----------------|
| Gold     | 161                   | 108             |
| Tantalum | 37                    | 37              |
| Tin      | 75                    | 54              |
| Tungsten | 45                    | 38              |
| Total    | 318                   | 237             |

#### Section 7: Other Matters

Based on the information provided by our suppliers through December 31, 2020, we believe that the facilities that may have been used to process conflict minerals in our products include the SORs listed in Annex I below.

After exercising the due diligence described above, Analog Devices concluded that some of its necessary conflict minerals originated in the Covered Countries. Analog Devices was unable to determine whether or not such conflict minerals directly or indirectly financed an armed group in the Covered Countries. Based on information provided by our suppliers and from the RCOI data from RMI, Analog Devices believes the origin of the conflict minerals contained in our products may include the countries listed in Annex II below as well as recycled and scrap sources.

Analog Devices will undertake the following steps during the next compliance period to continue to improve the due diligence conducted and to further mitigate the risk that our necessary conflict minerals benefit armed groups, including:

- Continue to participate in industry initiatives, such as the RMI. We participate actively in RMI Plenary sessions.
- Continue to contact SORs identified as a result of the RCOI process and request their participation in obtaining a "conformant" designation from an industry program such as the RMAP program or equivalent, if they have not already done so.
- Strengthen our alternate sourcing strategy to transition out suppliers who fail to comply with our Conflict Minerals requirements.
- Collaborate with our Procurement Team by providing them with resources that will guide them in choosing the material suppliers containing any or all of the conflict minerals.

This report includes forward-looking statements, within the meaning of the Private Securities Litigation Reform Act of 1995, which involve risks and uncertainties. Forward-looking statements provide current expectations of future events based on certain assumptions and include any statement that does not directly relate to any historical or current fact. Forward-looking statements can also be identified by words such as "expects," "plans," "intends," "will," "may," and similar terms. Forward-looking statements are not guarantees of future actions or performance. Analog Devices assumes no obligation to revise or update any forward-looking statements for any reason, except as required by law.

## ANNEX I

| Metal | Smelter Name   | Country                  |
|-------|--|--------------------------|
| Gold  | 8853 S.p.A.*   | ITALY                    |
| Gold  | Abington Reldan Metals, LLC                                    | UNITED STATES OF AMERICA |
| Gold  | Advanced Chemical Company*                                     | UNITED STATES OF AMERICA |
| Gold  | African Gold Refinery  | UGANDA                   |
| Gold  | Aida Chemical Industries Co., Ltd.*                            | JAPAN                    |
| Gold  | Al Etihad Gold Refinery DMCC*                                  | UNITED ARAB EMIRATES     |
| Gold  | Allgemeine Gold-und Silberscheideanstalt A.G.*                 | GERMANY                  |
| Gold  | Almalyk Mining and Metallurgical Complex (AMMC)*               | UZBEKISTAN               |
| Gold  | AngloGold Ashanti Corrego do Sitio Mineracao*                  | BRAZIL                   |
| Gold  | Argor-Heraeus S.A.*  | SWITZERLAND              |
| Gold  | Asahi Pretec Corp.*  | JAPAN                    |
| Gold  | Asahi Refining Canada Ltd.*                                    | CANADA                   |
| Gold  | Asahi Refining USA Inc.*                                       | UNITED STATES OF AMERICA |
| Gold  | Asaka Riken Co., Ltd.*   | JAPAN                    |
| Gold  | Atasay Kuyumculuk Sanayi Ve Ticaret A.S.                       | TURKEY                   |
| Gold  | AU Traders and Refiners*                                       | SOUTH AFRICA             |
| Gold  | Augmont Enterprises Private Limited**                          | INDIA                    |
| Gold  | Aurubis AG*  | GERMANY                  |
| Gold  | Bangalore Refinery*  | INDIA                    |
| Gold  | Bangko Sentral ng Pilipinas (Central Bank of the Philippines)* | PHILIPPINES              |
| Gold  | Boliden AB*  | SWEDEN                   |
| Gold  | C. Hafner GmbH + Co. KG*                                       | GERMANY                  |
| Gold  | C.I Metales Procesados Industriales SAS**                      | COLOMBIA                 |
| Gold  | Caridad  | MEXICO                   |
| Gold  | CCR Refinery - Glencore Canada Corporation*                    | CANADA                   |
| Gold  | Cendres + Metaux S.A.*   | SWITZERLAND              |
| Gold  | CGR Metalloys Pvt Ltd.   | INDIA                    |
| Gold  | Chimet S.p.A.*   | ITALY                    |
| Gold  | Chugai Mining*   | JAPAN                    |
| Gold  | Daye Non-Ferrous Metals Mining Ltd.                            | CHINA                    |
| Gold  | Degussa Sonne / Mond Goldhandel GmbH                           | GERMANY                  |
| Gold  | Dijllah Gold Refinery FZC                                      | UNITED ARAB EMIRATES     |
| Gold  | DODUCO Contacts and Refining GmbH*                             | GERMANY                  |
| Gold  | Dowa*  | JAPAN                    |

| Metal | Smelter Name   | Country                  |
|-------|--|--------------------------|
| Gold  | DSC (Do Sung Corporation)*                                       | KOREA, REPUBLIC OF       |
| Gold  | Eco-System Recycling Co., Ltd. East Plant*                       | JAPAN                    |
| Gold  | Eco-System Recycling Co., Ltd. North Plant*                      | JAPAN                    |
| Gold  | Eco-System Recycling Co., Ltd. West Plant*                       | JAPAN                    |
| Gold  | Emirates Gold DMCC*  | UNITED ARAB EMIRATES     |
| Gold  | Fidelity Printers and Refiners Ltd.                              | ZIMBABWE                 |
| Gold  | Fujairah Gold FZC  | UNITED ARAB EMIRATES     |
| Gold  | GCC Gujrat Gold Centre Pvt. Ltd.                                 | INDIA                    |
| Gold  | Geib Refining Corporation*                                       | UNITED STATES OF AMERICA |
| Gold  | Gold Coast Refinery  | GHANA                    |
| Gold  | Gold Refinery of Zijin Mining Group Co., Ltd.*                   | CHINA                    |
| Gold  | Great Wall Precious Metals Co., Ltd. of CBPM                     | CHINA                    |
| Gold  | Guangdong Jinding Gold Limited                                   | CHINA                    |
| Gold  | Guoda Safina High-Tech Environmental Refinery Co., Ltd.          | CHINA                    |
| Gold  | Hangzhou Fuchunjiang Smelting Co., Ltd.                          | CHINA                    |
| Gold  | Heimerle + Meule GmbH*   | GERMANY                  |
| Gold  | Heraeus Germany GmbH Co. KG**                                    | GERMANY                  |
| Gold  | Heraeus Metals Hong Kong Ltd.*                                   | CHINA                    |
| Gold  | Hunan Chenzhou Mining Co., Ltd.                                  | CHINA                    |
| Gold  | Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd.              | CHINA                    |
| Gold  | HwaSeong CJ CO., LTD.  | KOREA, REPUBLIC OF       |
| Gold  | Industrial Refining Company                                      | BELGIUM                  |
| Gold  | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.* | CHINA                    |
| Gold  | International Precious Metal Refiners**                          | UNITED ARAB EMIRATES     |
| Gold  | Ishifuku Metal Industry Co., Ltd.*                               | JAPAN                    |
| Gold  | Istanbul Gold Refinery*  | TURKEY                   |
| Gold  | Italpreziosi*  | ITALY                    |
| Gold  | JALAN & Company  | INDIA                    |
| Gold  | Japan Mint*  | JAPAN                    |
| Gold  | Jiangxi Copper Co., Ltd.*  | CHINA                    |
| Gold  | JSC Ekaterinburg Non-Ferrous Metal Processing Plant              | RUSSIAN FEDERATION       |
| Gold  | JSC Novosibirsk Refinery*  | RUSSIAN FEDERATION       |
| Gold  | JSC Uralelectromed*  | RUSSIAN FEDERATION       |
| Gold  | JX Nippon Mining & Metals Co., Ltd.*                             | JAPAN                    |
| Gold  | Kaloti Precious Metals   | UNITED ARAB EMIRATES     |

| Metal | Smelter Name   | Country                  |
|-------|--|--------------------------|
| Gold  | Kazakhmys Smelting LLC                                       | KAZAKHSTAN               |
| Gold  | Kazzinc*   | KAZAKHSTAN               |
| Gold  | Kennecott Utah Copper LLC*                                   | UNITED STATES OF AMERICA |
| Gold  | KGHM Polska Miedz Spolka Akcyjna*                            | POLAND                   |
| Gold  | Kojima Chemicals Co., Ltd.*                                  | JAPAN                    |
| Gold  | Korea Zinc Co., Ltd.*  | KOREA, REPUBLIC OF       |
| Gold  | Kundan Care Products Ltd.                                    | INDIA                    |
| Gold  | Kyrgyzaltyn JSC*   | KYRGYZSTAN               |
| Gold  | Kyshtym Copper-Electrolytic Plant ZAO                        | RUSSIAN FEDERATION       |
| Gold  | L'azurde Company For Jewelry                                 | SAUDI ARABIA             |
| Gold  | Lingbao Gold Co., Ltd.                                       | CHINA                    |
| Gold  | Lingbao Jinyuan Tonghui Refinery Co., Ltd.                   | CHINA                    |
| Gold  | L'Orfebre S.A.*  | ANDORRA                  |
| Gold  | LS-NIKKO Copper Inc.*  | KOREA, REPUBLIC OF       |
| Gold  | LT Metal Ltd.*   | KOREA, REPUBLIC OF       |
| Gold  | Luoyang Zijin Yinhui Gold Refinery Co., Ltd.                 | CHINA                    |
| Gold  | Marsam Metals*   | BRAZIL                   |
| Gold  | Materion*  | UNITED STATES OF AMERICA |
| Gold  | Matsuda Sangyo Co., Ltd.*                                    | JAPAN                    |
| Gold  | Metal Concentrators SA (Pty) Ltd.*                           | SOUTH AFRICA             |
| Gold  | Metalor Technologies (Hong Kong) Ltd.*                       | CHINA                    |
| Gold  | Metalor Technologies (Singapore) Pte., Ltd.*                 | SINGAPORE                |
| Gold  | Metalor Technologies (Suzhou) Ltd.*                          | CHINA                    |
| Gold  | Metalor Technologies S.A.*                                   | SWITZERLAND              |
| Gold  | Metalor USA Refining Corporation*                            | UNITED STATES OF AMERICA |
| Gold  | Metalurgica Met-Mex Penoles S.A. De C.V.*                    | MEXICO                   |
| Gold  | Mitsubishi Materials Corporation*                            | JAPAN                    |
| Gold  | Mitsui Mining and Smelting Co., Ltd.*                        | JAPAN                    |
| Gold  | MMTC-PAMP India Pvt., Ltd.*                                  | INDIA                    |
| Gold  | Modeltech Sdn Bhd  | MALAYSIA                 |
| Gold  | Morris and Watson  | NEW ZEALAND              |
| Gold  | Moscow Special Alloys Processing Plant*                      | RUSSIAN FEDERATION       |
| Gold  | Nadir Metal Rafineri San. Ve Tic. A.S.*                      | TURKEY                   |
| Gold  | Navoi Mining and Metallurgical Combinat*                     | UZBEKISTAN               |
| Gold  | NH Recytech Company  | KOREA, REPUBLIC OF       |
| Gold  | Nihon Material Co., Ltd.*                                    | JAPAN                    |
| Gold  | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH* | AUSTRIA                  |

| Metal | Smelter Name  | Country                   |
|-------|---|---------------------------|
| Gold  | Ohura Precious Metal Industry Co., Ltd.*                      | JAPAN                     |
|       | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC |                           |
| Gold  | Krastsvetmet)*  | RUSSIAN FEDERATION        |
| Gold  | PAMP S.A.*  | SWITZERLAND               |
| Gold  | Pease & Curren  | UNITED STATES OF AMERICA  |
| Gold  | Penglai Penggang Gold Industry Co., Ltd.                      | CHINA                     |
| Gold  | Planta Recuperadora de Metales SpA*                           | CHILE                     |
| Gold  | Prioksky Plant of Non-Ferrous Metals*                         | RUSSIAN FEDERATION        |
| Gold  | PT Aneka Tambang (Persero) Tbk*                               | INDONESIA                 |
| Gold  | PX Precinox S.A.*   | SWITZERLAND               |
| Gold  | QG Refining, LLC  | UNITED STATES OF AMERICA  |
| Gold  | Rand Refinery (Pty) Ltd.*                                     | SOUTH AFRICA              |
| Gold  | Refinery of Seemine Gold Co., Ltd.                            | CHINA                     |
| Gold  | REMONDIS PMR B.V.*  | NETHERLANDS               |
| Gold  | Royal Canadian Mint*  | CANADA                    |
| Gold  | SAAMP*  | FRANCE                    |
| Gold  | Sabin Metal Corp.   | UNITED STATES OF AMERICA  |
| Gold  | Safimet S.p.A*  | ITALY                     |
| Gold  | SAFINA A.S.*  | CZECHIA                   |
| Gold  | Sai Refinery  | INDIA                     |
| Gold  | Samduck Precious Metals*                                      | KOREA, REPUBLIC OF        |
| Gold  | Samwon Metals Corp.   | KOREA, REPUBLIC OF        |
| Gold  | SAXONIA Edelmetalle GmbH*                                     | GERMANY                   |
| Gold  | SEMPSA Joyeria Plateria S.A.*                                 | SPAIN                     |
| Gold  | Shandong Gold Smelting Co., Ltd.*                             | CHINA                     |
| Gold  | Shandong Humon Smelting Co., Ltd.                             | CHINA                     |
| Gold  | Shandong Tiancheng Biological Gold Industrial Co., Ltd.       | CHINA                     |
| Gold  | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.*            | CHINA                     |
| Gold  | Shenzhen Zhonghenglong Real Industry Co., Ltd.                | CHINA                     |
| Gold  | Shirpur Gold Refinery Ltd.                                    | INDIA                     |
| Gold  | Sichuan Tianze Precious Metals Co., Ltd.*                     | CHINA                     |
| Gold  | Singway Technology Co., Ltd.*                                 | TAIWAN, PROVINCE OF CHINA |
| Gold  | SOE Shyolkovsky Factory of Secondary Precious Metals*         | RUSSIAN FEDERATION        |
| Gold  | Solar Applied Materials Technology Corp.*                     | TAIWAN, PROVINCE OF CHINA |
| Gold  | Sovereign Metals  | INDIA                     |

| Metal    | Smelter Name   | Country                  |
|----------|--|--------------------------|
| Gold     | State Research Institute Center for Physical Sciences and Technology | LITHUANIA                |
| Gold     | Sudan Gold Refinery  | SUDAN                    |
| Gold     | Sumitomo Metal Mining Co., Ltd.*                                     | JAPAN                    |
| Gold     | SungEel HiMetal Co., Ltd.*   | KOREA, REPUBLIC OF       |
| Gold     | T.C.A S.p.A*   | ITALY                    |
| Gold     | Tanaka Kikinzoku Kogyo K.K.*   | JAPAN                    |
| Gold     | Tokuriki Honten Co., Ltd.*   | JAPAN                    |
| Gold     | Tongling Nonferrous Metals Group Co., Ltd.                           | CHINA                    |
| Gold     | TOO Tau-Ken-Altyn*   | KAZAKHSTAN               |
| Gold     | Torecom*   | KOREA, REPUBLIC OF       |
| Gold     | TSK Pretech*   | KOREA, REPUBLIC OF       |
| Gold     | Umicore Precious Metals Thailand*                                    | THAILAND                 |
| Gold     | Umicore S.A. Business Unit Precious Metals Refining*                 | BELGIUM                  |
| Gold     | United Precious Metal Refining, Inc.*                                | UNITED STATES OF AMERICA |
| Gold     | Valcambi S.A.*   | SWITZERLAND              |
| Gold     | Western Australian Mint (T/a The Perth Mint)*                        | AUSTRALIA                |
| Gold     | WIELAND Edelmetalle GmbH*  | GERMANY                  |
| Gold     | Yamakin Co., Ltd.*   | JAPAN                    |
| Gold     | Yokohama Metal Co., Ltd.*  | JAPAN                    |
| Gold     | Yunnan Copper Industry Co., Ltd.                                     | CHINA                    |
| Gold     | Zhongyuan Gold Smelter of Zhongjin Gold Corporation*                 | CHINA                    |
| Tantalum | AMG Brasil*  | BRAZIL                   |
| Tantalum | Asaka Riken Co., Ltd.*   | JAPAN                    |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd.*                           | CHINA                    |
| Tantalum | D Block Metals, LLC*   | UNITED STATES OF AMERICA |
| Tantalum | Exotech Inc.*  | UNITED STATES OF AMERICA |
| Tantalum | F&X Electro-Materials Ltd.*  | CHINA                    |
| Tantalum | FIR Metals & Resource Ltd.*  | CHINA                    |
| Tantalum | Global Advanced Metals Aizu*   | JAPAN                    |
| Tantalum | Global Advanced Metals Boyertown*                                    | UNITED STATES OF AMERICA |
| Tantalum | H.C. Starck Hermsdorf GmbH*  | GERMANY                  |
| Tantalum | H.C. Starck Inc.*  | UNITED STATES OF AMERICA |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd.*                   | CHINA                    |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd.*                        | CHINA                    |
| Tantalum | Jiangxi Tuohong New Raw Material*                                    | CHINA                    |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd.*                         | CHINA                    |

| Metal       | Smelter Name   | Country                         |
|-------------|--|---------------------------------|
| Tantalum    | Jiujiang Tanbre Co., Ltd.*   | CHINA                           |
| Tantalum    | Jiujiang Zhongao Tantalum & Niobium Co., Ltd.*   | CHINA                           |
| Tantalum    | KEMET de Mexico*   | MEXICO                          |
| Tantalum    | Meta Materials*  | NORTH MACEDONIA, REPUBLIC<br>OF |
| Tantalum    | Metallurgical Products India Pvt., Ltd.*   | INDIA                           |
| Tantalum    | Mineracao Taboca S.A.*   | BRAZIL                          |
| Tantalum    | Mitsui Mining and Smelting Co., Ltd.*  | JAPAN                           |
| Tantalum    | Ningxia Orient Tantalum Industry Co., Ltd.*  | CHINA                           |
| Tantalum    | NPM Silmet AS*   | ESTONIA                         |
| Tantalum    | QuantumClean*  | UNITED STATES OF AMERICA        |
| Tantalum    | Resind Industria e Comercio Ltda.*   | BRAZIL                          |
| Tantalum    | Solikamsk Magnesium Works OAO*   | RUSSIAN FEDERATION              |
| Tantalum    | Taki Chemical Co., Ltd.*   | JAPAN                           |
| Tantalum    | TANIOBIS Co., Ltd.*  | THAILAND                        |
| Tantalum    | TANIOBIS GmbH*   | GERMANY                         |
| Tantalum    | TANIOBIS Japan Co., Ltd.*  | JAPAN                           |
| Tantalum    | TANIOBIS Smelting GmbH & Co. KG*   | GERMANY                         |
| Tantalum    | Telex Metals*  | UNITED STATES OF AMERICA        |
| Tantalum    | Ulba Metallurgical Plant JSC*  | KAZAKHSTAN                      |
| Tantalum    | XIMEI RESOURCES (GUANGDONG) LIMITED*   | CHINA                           |
| Tantalum    | XinXing HaoRong Electronic Material Co., Ltd.*   | CHINA                           |
| Tantalum    | Yanling Jincheng Tantalum & Niobium Co., Ltd.*   | CHINA                           |
| Tin         | Alpha*   | UNITED STATES OF AMERICA        |
| Tin         | An Vinh Joint Stock Mineral Processing Company   | VIET NAM                        |
| Tin         | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.*                                       | CHINA                           |
| Tin         | Chifeng Dajingzi Tin Industry Co., Ltd.*   | CHINA                           |
| Tin         | China Tin Group Co., Ltd.*   | CHINA                           |
| Tin         | CV Ayi Jaya**  | INDONESIA                       |
| Tin         | CV Venus Inti Perkasa**  | INDONESIA                       |
| Tin         | Dongguan CiEXPO Environmental Engineering Co., Ltd.                                      | CHINA                           |
| Tin         | Dowa*  | JAPAN                           |
| Tin         | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint<br>Stock Company | VIET NAM                        |
| Tin         | EM Minto*  | BOLIVIA (PLURINATIONAL STATE    |
| Tin         | Estanha da Dandania S.A. **  |                                 |
| 11ll<br>Tin | Estallilo de Rolldollia S.A.   | DRALIL                          |
| 1111        | reiiix ivietais.   | FOLAND                          |

| Metal | Smelter Name                                     | Country                          |
|-------|--|----------------------------------|
| Tin   | Gejiu City Fuxiang Industry and Trade Co., Ltd.  | CHINA                            |
| Tin   | Gejiu Fengming Metallurgy Chemical Plant*        | CHINA                            |
| Tin   | Gejiu Kai Meng Industry and Trade LLC*           | CHINA                            |
| Tin   | Gejiu Non-Ferrous Metal Processing Co., Ltd.*    | CHINA                            |
| Tin   | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.*  | CHINA                            |
| Tin   | Gejiu Zili Mining And Metallurgy Co., Ltd.*      | CHINA                            |
| Tin   | Guangdong Hanhe Non-Ferrous Metal Co., Ltd.*     | CHINA                            |
| Tin   | HuiChang Hill Tin Industry Co., Ltd.*            | CHINA                            |
| Tin   | Jiangxi New Nanshan Technology Ltd.*             | CHINA                            |
| Tin   | Luna Smelter, Ltd.*                              | RWANDA                           |
| Tin   | Ma'anshan Weitai Tin Co., Ltd.*                  | CHINA                            |
| Tin   | Magnu's Minerais Metais e Ligas Ltda.*           | BRAZIL                           |
| Tin   | Malaysia Smelting Corporation (MSC)*             | MALAYSIA                         |
| Tin   | Melt Metais e Ligas S.A.*                        | BRAZIL                           |
| Tin   | Metallic Resources, Inc.*                        | UNITED STATES OF AMERICA         |
| Tin   | Metallo Belgium N.V.*                            | BELGIUM                          |
| Tin   | Metallo Spain S.L.U.*                            | SPAIN                            |
| Tin   | Mineracao Taboca S.A.*                           | BRAZIL                           |
| Tin   | Minsur*  | PERU                             |
| Tin   | Mitsubishi Materials Corporation*                | JAPAN                            |
| Tin   | Modeltech Sdn Bhd                                | MALAYSIA                         |
| Tin   | Nghe Tinh Non-Ferrous Metals Joint Stock Company | VIET NAM                         |
| Tin   | Novosibirsk Processing Plant Ltd.**              | RUSSIAN FEDERATION               |
| Tin   | O.M. Manufacturing (Thailand) Co., Ltd.*         | THAILAND                         |
| Tin   | O.M. Manufacturing Philippines, Inc.*            | PHILIPPINES                      |
| Tin   | Operaciones Metalurgicas S.A.*                   | BOLIVIA (PLURINATIONAL STATE OF) |
| Tin   | Pongpipat Company Limited                        | MYANMAR                          |
| Tin   | Precious Minerals and Smelting Limited           | INDIA                            |
| Tin   | PT Aries Kencana Sejahtera**                     | INDONESIA                        |
| Tin   | PT Artha Cipta Langgeng*                         | INDONESIA                        |
| Tin   | PT ATD Makmur Mandiri Jaya*                      | INDONESIA                        |
| Tin   | PT Babel Inti Perkasa*                           | INDONESIA                        |
| Tin   | PT Babel Surya Alam Lestari*                     | INDONESIA                        |
| Tin   | PT Bangka Serumpun*                              | INDONESIA                        |
| Tin   | PT Bukit Timah**                                 | INDONESIA                        |
| Tin   | PT Cipta Persada Mulia                           | INDONESIA                        |
| Tin   | PT Lautan Harmonis Sejahtera**                   | INDONESIA                        |
| Tin   | PT Menara Cipta Mulia*                           | INDONESIA                        |

| Metal    | Smelter Name   | Country                   |
|----------|--|---------------------------|
| Tin      | PT Mitra Stania Prima*                                       | INDONESIA                 |
| Tin      | PT Mitra Sukses Globalindo                                   | INDONESIA                 |
| Tin      | PT Prima Timah Utama*  | INDONESIA                 |
| Tin      | PT Rajawali Rimba Perkasa*                                   | INDONESIA                 |
| Tin      | PT Rajehan Ariq*   | INDONESIA                 |
| Tin      | PT Refined Bangka Tin*                                       | INDONESIA                 |
| Tin      | PT Stanindo Inti Perkasa*                                    | INDONESIA                 |
| Tin      | PT Timah Nusantara**   | INDONESIA                 |
| Tin      | PT Timah Tbk Kundur*   | INDONESIA                 |
| Tin      | PT Timah Tbk Mentok*   | INDONESIA                 |
| Tin      | PT Tinindo Inter Nusa*                                       | INDONESIA                 |
| Tin      | Resind Industria e Comercio Ltda.*                           | BRAZIL                    |
| Tin      | Rui Da Hung*   | TAIWAN, PROVINCE OF CHINA |
| Tin      | Soft Metais Ltda.*   | BRAZIL                    |
| Tin      | Super Ligas**  | BRAZIL                    |
| Tin      | Thai Nguyen Mining and Metallurgy Co., Ltd.*                 | VIET NAM                  |
| Tin      | Thaisarco*   | THAILAND                  |
| Tin      | Tin Technology & Refining*                                   | UNITED STATES OF AMERICA  |
| Tin      | Tuyen Quang Non-Ferrous Metals Joint Stock Company           | VIET NAM                  |
| Tin      | VQB Mineral and Trading Group JSC                            | VIET NAM                  |
| Tin      | White Solder Metalurgia e Mineracao Ltda.*                   | BRAZIL                    |
| Tin      | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.*               | CHINA                     |
| Tin      | Yunnan Tin Company Limited*                                  | CHINA                     |
| Tin      | Yunnan Yunfan Non-ferrous Metals Co., Ltd.*                  | CHINA                     |
| Tungsten | A.L.M.T. Corp.*  | JAPAN                     |
| Tungsten | ACL Metais Eireli*   | BRAZIL                    |
| Tungsten | Albasteel Industria e Comercio de Ligas Para Fundicao Ltd.** | BRAZIL                    |
| Tungsten | Asia Tungsten Products Vietnam Ltd.*                         | VIET NAM                  |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd.*                | CHINA                     |
| Tungsten | China Molybdenum Tungsten Co., Ltd.*                         | CHINA                     |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd.*                        | CHINA                     |
| Tungsten | CNMC (Guangxi) PGMA Co., Ltd.                                | CHINA                     |
| Tungsten | Cronimet Brasil Ltda**                                       | BRAZIL                    |
| Tungsten | Fujian Ganmin RareMetal Co., Ltd.*                           | CHINA                     |
| Tungsten | Ganzhou Haichuang Tungsten Co., Ltd.*                        | CHINA                     |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd.*                 | CHINA                     |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd.*                     | CHINA                     |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd.*                          | CHINA                     |

| Metal    | Smelter Name   | Country                   |
|----------|--|---------------------------|
| Tungsten | GEM Co., Ltd.**  | CHINA                     |
| Tungsten | Global Tungsten & Powders Corp.*                               | UNITED STATES OF AMERICA  |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd.*                          | CHINA                     |
| Tungsten | H.C. Starck Tungsten GmbH*                                     | GERMANY                   |
| Tungsten | Hunan Chenzhou Mining Co., Ltd.*                               | CHINA                     |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd.*                   | CHINA                     |
| Tungsten | Hydrometallurg, JSC*   | RUSSIAN FEDERATION        |
| Tungsten | Japan New Metals Co., Ltd.*                                    | JAPAN                     |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd.*               | CHINA                     |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd.*                            | CHINA                     |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.          | CHINA                     |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.* | CHINA                     |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd.*                  | CHINA                     |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd.*                           | CHINA                     |
| Tungsten | JSC "Kirovgrad Hard Alloys Plant"**                            | RUSSIAN FEDERATION        |
| Tungsten | Kennametal Fallon*   | UNITED STATES OF AMERICA  |
| Tungsten | Kennametal Huntsville*   | UNITED STATES OF AMERICA  |
| Tungsten | KGETS Co., Ltd.*   | KOREA, REPUBLIC OF        |
| Tungsten | Lianyou Metals Co., Ltd.*                                      | TAIWAN, PROVINCE OF CHINA |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd.*                               | CHINA                     |
| Tungsten | Masan High-Tech Materials*                                     | VIET NAM                  |
| Tungsten | Moliren Ltd.*  | RUSSIAN FEDERATION        |
| Tungsten | Niagara Refining LLC*  | UNITED STATES OF AMERICA  |
| Tungsten | NPP Tyazhmetprom LLC**   | RUSSIAN FEDERATION        |
| Tungsten | Philippine Chuangxin Industrial Co., Inc.*                     | PHILIPPINES               |
| Tungsten | TANIOBIS Smelting GmbH & Co. KG*                               | GERMANY                   |
| Tungsten | Unecha Refractory metals plant*                                | RUSSIAN FEDERATION        |
| Tungsten | Wolfram Bergbau und Hutten AG*                                 | AUSTRIA                   |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd.*                              | CHINA                     |
| Tungsten | Xiamen Tungsten Co., Ltd.*                                     | CHINA                     |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.*   | CHINA                     |

\* Smelter name included in the RMAP Conformant Smelters and Refiners as of May 3, 2020 \*\* Smelter name included in the RMI Active Smelters and Refiners List as of April 23, 2020

## ANNEX II

| Andorra                           | Ethiopia           |
|-----------------------------------|--------------------|
| Angola                            | Fiji               |
| Argentina                         | Finland            |
| Armenia                           | France             |
| Australia                         | French Guiana      |
| Austria                           | Gabon              |
| Azerbaijan                        | Gambia, The        |
| Bahamas                           | Georgia            |
| Bangladesh                        | Germany            |
| Belarus                           | Ghana              |
| Belgium                           | Greece             |
| Benin                             | Guatemala          |
| Bolivia                           | Guinea             |
| Bolivia (Plurinational State of)  | Guyana             |
| Botswana                          | Honduras           |
| Brazil                            | Hong Kong          |
| Brunei                            | Hungary            |
| Bulgaria                          | Iceland            |
| Burkina Faso                      | India              |
| Burundi                           | Indonesia          |
| Cameroon                          | Iran               |
| Canada                            | Ireland            |
| Cayman Islands                    | Israel             |
| Chile                             | Italy              |
| China                             | Ivory Coast        |
| Colombia                          | Japan              |
| Congo, Democratic Republic of the | Jordan             |
| Costa Rica                        | Kazakhstan         |
| Cote d'Ivoire                     | Kazakhstan         |
| Croatia                           | Kenya              |
| Cuba                              | Korea, Republic of |
| Cyprus                            | Kuwait             |
| Czechia                           | Kyrgyzstan         |
| Denmark                           | Laos               |
| Dominican Republic                | Latvia             |
| Ecuador                           | Lebanon            |
| Egypt                             | Liberia            |
| El Salvador                       | Libya              |
| Eritrea                           | Liechtenstein      |
| Estonia                           | Lithuania          |
|                                   |                    |

| Luxembourg         | Senegal  |
|--------------------|--|
| Macau              | Serbia   |
| Madagascar         | Sierra Leone   |
| Malaysia           | Singapore  |
| Mali               | Slovakia   |
| Malta              | Slovenia   |
| Mauritania         | Solomon Islands                                      |
| Mauritius          | South Africa   |
| Mexico             | South Korea  |
| Monaco             | Spain  |
| Mongolia           | St Vincent and Grenadines                            |
| Morocco            | Sudan  |
| Mozambique         | Suriname   |
| Myanmar            | Swaziland  |
| Namibia            | Sweden   |
| Netherlands        | Switzerland  |
| New Caledonia      | Taiwan   |
| New Zealand        | Tajikistan   |
| Nicaragua          | Tanzania   |
| Niger              | Thailand   |
| Nigeria            | Togo   |
| Norway             | Trinidad and Tobago                                  |
| Pakistan           | Tunisia  |
| Panama             | Turkey   |
| Papua New Guinea   | Uganda   |
| Paraguay           | Ukraine  |
| Peru               | United Arab Emirates                                 |
| Philippines        | United Kingdom                                       |
| Poland             | United Kingdom of Great Britain and Northern Ireland |
| Portugal           | United States of America                             |
| Puerto Rico        | Uruguay  |
| Qatar              | USA  |
| Romania            | Uzbekistan   |
| Russia             | Venezuela  |
| Russian Federation | Vietnam  |
| Rwanda             | Yemen  |
| San Marino         | Zambia   |
| Saudi Arabia       | Zimbabwe   |