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**UNITED STATES OF AMERICA**  
**SECURITIES AND EXCHANGE COMMISSION**  
Washington, D.C. 20549

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**FORM SD**

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**Specialized Disclosure Report**

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**COMMSCOPE HOLDING COMPANY, INC.**

(Exact name of registrant as specified in its charter)

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**Delaware**  
(State or Other Jurisdiction  
of Incorporation)

**001-36146**  
Commission File  
Number

**27-4332098**  
(IRS Employer  
Identification No.)

**1100 CommScope Place, SE**  
**Hickory, North Carolina 28602**  
(Addresses of principal executive offices)

**Alexander W. Pease**  
**Executive Vice President and Chief Financial Officer**  
**(828) 324-2200**

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

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Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2019.

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## **Section 1 - Conflict Minerals Disclosure**

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

#### **Conflict Minerals Disclosure**

In accordance with Rule 13p-1 under the Securities Exchange Act of 1934 (“Rule 13p-1”), CommScope Holding Company, Inc. has filed this Specialized Disclosure Report (“Form SD”) and Conflict Minerals Report for the calendar year ended December 31, 2019. Both reports are publicly available at <https://www.commscope.com/globalassets/digizuite/416819-form-sd-and-conflict-minerals-report.pdf>.

#### **Item 1.02 Exhibit**

A copy of our Conflict Minerals Report for the year ended December 31, 2019 is filed as Exhibit 1.01 hereto.

## **Section 2 - Exhibits**

### **Item 2.01 Exhibits**

Exhibit 1.01 - Conflict Minerals Report 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 caused this report to be signed on its behalf by the undersigned, hereunto duly authorized.

Date: May 22, 2020

COMMSCOPE HOLDING COMPANY, INC.

By: /s/ Alexander W. Pease

Alexander W. Pease

Executive Vice President and Chief Financial Officer

## EXHIBIT INDEX

Exhibit No.	Description
1.01	<a href="#">Conflict Minerals Report for the Calendar Year Ended December 31, 2019.</a>

**Conflict Minerals Report of CommScope Holding Company, Inc.  
For the Calendar Year Ended December 31, 2019  
Pursuant to Rule 13P-1 Under The Securities Exchange Act of 1934**

CommScope Holding Company, Inc. presents this Conflict Minerals Report for the reporting period of January 1, 2019 to December 31, 2019 pursuant to Rule 13p-1 under the Securities Exchange Act of 1934 and associated guidance issued by the Securities and Exchange Commission. Unless otherwise specified or unless the context otherwise requires, references to “CommScope,” “we,” “us” or “our” refer to CommScope Holding Company, Inc. and its consolidated subsidiaries.

### **Overview of our Conflict Minerals Program**

CommScope is a leading global provider of infrastructure solutions for communication networks. In 2014, our leaders defined a sustainability philosophy on corporate responsibility that embraces our core company values. In keeping with our values and supporting our efforts to respect people and our planet, we expect our suppliers to conduct their worldwide operations in a socially and environmentally responsible manner and source raw materials only from reputable organizations pursuant to our Conflict Minerals Policy (the “Policy”) and following the Organisation for Economic Co-operation and Development (“OECD”) due diligence framework, third edition. The Policy is available on our website at [https://www.commscope.com/Docs/Corporate-Responsibility/Supplier-Responsibility/CommScope\\_Conflict\\_Minerals\\_Policy.pdf](https://www.commscope.com/Docs/Corporate-Responsibility/Supplier-Responsibility/CommScope_Conflict_Minerals_Policy.pdf).

On April 4, 2019, CommScope completed the acquisition of ARRIS International plc, a global leader in entertainment and communications solutions. The operations of the ARRIS business are included in this Conflict Minerals Report. Prior to the acquisition, ARRIS was a SEC registrant that filed a Form SD and accompanying Conflict Minerals Report with the SEC. Because we have yet to fully integrate ARRIS’s enterprise resource planning systems into CommScope’s systems, we continue to rely on ARRIS’s systems to determine the in scope vendors for products historically produced by the ARRIS business.

### **CommScope Products**

Conflict minerals in the form of tin, tantalum, tungsten and gold were necessary to the functionality or production of products we manufactured or contracted to have manufactured during 2019 within our operating segments as follows:

- Connectivity Solutions – Fiber optic and copper cable and connectivity solutions for use in data centers and business enterprise, telecommunications, cable television and residential broadband networks. Includes both indoor and outdoor network applications.
- Mobility Solutions – Essential building blocks for base station sites and related connectivity; indoor, outdoor and distributed antenna wireless systems; and wireless network backhaul products.
- Customer Premises Equipment - Subscriber-based solutions that support broadband and video applications connecting cable, telecommunications and satellite service providers to a customer’s home.
- Network & Cloud - Cable modem termination system, video infrastructure, distribution and transmission equipment and cloud solutions that enable facility-based service providers to construct a state-of-the-art residential and metro distribution network.
- Ruckus Networks - Converged wired (local area network (LAN)) and wireless (WLAN) networks for enterprises and service providers.

### **Reasonable Country of Origin Inquiry**

We conducted a reasonable country of origin inquiry (“RCOI”) and due diligence on the source and chain of custody using the Responsible Minerals Initiative (RMI) Conflict Minerals Reporting Template (“CMRT”) to determine whether any of the necessary conflict minerals in our 2019 products originated in the Democratic Republic of the Congo (“DRC”) and the adjoining countries (together with the DRC, the “Covered Countries”), or were conflict minerals from recycled or scrap sources. The term “conflict minerals” comes from section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and the Conflict Minerals Rule, [Rule 13p-1 promulgated under the Securities Exchange Act of 1934, as amended][17 CFR Parts 240.13p-1 and 249b.400], and is defined as columbite-tantalite, also known as coltan (from which tantalum is derived); cassiterite (tin); gold; wolframite (tungsten); or their derivatives; or any other mineral or its derivatives determined by the U.S. Secretary of State to be financing conflict in the Covered Countries. To make the RCOI determination, we engaged our suppliers to identify the smelters and refiners (“facilities”) of necessary conflict minerals that may have been contained in our products and reviewed available information on the sourcing of conflict minerals by facilities, including information about the facilities provided by the Responsible Minerals Initiative (RMI) regarding processors of conflict minerals.

Our RCOI included:

- Identifying relevant in scope suppliers from our Enterprise Resource Planning (ERP) software for inclusion in the RCOI Conflict Mineral survey. These suppliers provided materials, parts, components containing necessary conflict minerals.

- Performing risk assessments or collecting data from suppliers using the RMI CMRT which included questions about the location or mine of origin from in scope suppliers.
- Requiring, as part of the survey and our accompanying communications, that, when requested, suppliers provide a statement indicating that conflict minerals are not in use in the supplied parts or complete the CMRT. The CMRT is used to provide CommScope information from the vendors' supply chains regarding facilities and the origin of necessary conflict minerals processed at these facilities.
- If needed, following up with suppliers to clarify, update or complete information reported to us through the CMRT or their statement. Responses requiring follow-up included issues with completeness, consistency, supplier's completeness of facility data, traceability, and indicating conflict minerals were not used in their products when assessed high risk as containing conflict minerals.

We have communicated to suppliers that we expect all materials supplied to CommScope to be free of conflict minerals from facilities which directly or indirectly support the illegal armed groups in the DRC region. However, continuing to source from conformant facilities from Covered Countries is acceptable.

### **RCOI Conflict Minerals Status**

We have determined with respect to our products containing necessary conflict minerals that we know or have reason to believe that some of the necessary conflict minerals originated or may have originated in the Covered Countries.

### **Conflict Minerals Due Diligence Measures**

Our conflict minerals due diligence process is based on the OECD's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition 2016), including the Supplement on Tin, Tantalum and Tungsten and the Supplement on Gold (the "OECD Guidance"), a recognized due diligence framework. We conducted due diligence measures on the source and chain of custody of our conflict minerals to determine whether these conflict minerals originated in any of the Covered Countries and financed or benefited non-state armed groups in any of these countries.

### **Design of our Due Diligence Measures**

The design of our due diligence measures is specific to our downstream position in the minerals supply chain and the OECD recommendations for downstream actors that have no direct relationships to facilities. As a member of RMI, we evaluate all facilities reported by suppliers against the RMI Smelter Database and the RMI RCOI Data to determine facility validity and country of origin.

The design of our due diligence process includes the following steps:

#### **(1) Establishment of strong internal company management systems, including the following:**

- Conflict Minerals Policy.
- Cross-functional Team that includes Procurement, Quality, Product Compliance, and Legal, with executive management support.
- Conflict minerals process document as part of our ISO 9001/TL9000 Quality Management System "Due Diligence Process for Reporting of Conflict Minerals."
- Identification and assessment of conflict minerals risks in our supply chain.
- Design and implementation of strategies to respond to conflict minerals risks identified.
- Supplier agreement language that includes supplier responsible minerals requirements.
- Utilizing a conflict mineral management system that includes data storage, analysis and reporting.
- Employees and external parties have access to an ethics reporting system, the CommAlert Line (866-277-2410), or may report via the website <https://commalert.alertline.com> or email CommScope's Corporate Ethics Officer at [ethics@commscope.com](mailto:ethics@commscope.com).
- Contribution to independent third-party audits of the due diligence practices of conflict minerals facilities by participating in industry organizations.
- Reporting on our conflict minerals supply chain due diligence activities.

#### **(2) Design and implementation of a strategy to respond to identified risks**

As a downstream supplier, we do not assess the due diligence practices of facilities. We assess supplier responses against internally established criteria for completeness, consistency and risk. We contact suppliers that provided incomplete, inaccurate or untraceable information to correct and/or obtain additional information. Unresponsive suppliers are identified and forwarded to the Procurement team for further review. Each unresponsive supplier is indicated in a report provided to the Conflict Minerals Corporate Management Team for supplier review to determine if alternative sourcing will be pursued. We encourage in scope suppliers to urge facilities in their supply chain to join the Responsible Minerals Assurance Process (RMAP). We evaluate all facilities reported by suppliers against the RMI Smelter Database and the RMI RCOI Data to determine facility validity and country of origin.

**(3) Support of industry organizations to carry out independent third-party audits of facilities’ due diligence practices**

We support the industry initiative that conducts audits of facilities’ due diligence activities and we encourage our suppliers to source from facilities that participate in the RMAP. As a downstream supplier, we do not have a direct relationship with conflict minerals facilities and do not perform or direct audits of these entities within our supply chain. As a member of RMI, we utilized information made available by RMI concerning independent third-party audits of facilities and country of origin.

**(4) Annual reporting** through this Conflict Minerals Report.

**Future Goals to Mitigate Risk**

We are committed to continuously improving our RCOI and due diligence process and intend to take the following steps in 2020:

- (1) Continue participation in RMI to drive the improvement of industry tools, resources and traceability programs.
- (2) Continue to educate our suppliers and clearly communicate our expectations of our conflict minerals requirements.
- (3) Review and follow-up with suppliers on reported unknown, incorrect and high-risk facilities.
- (4) Review unresponsive or high-risk suppliers to determine if alternative sourcing is available.

**Due Diligence Results**

We had a response rate of 95% to our supplier RCOI, and completed due diligence for facilities (smelters and refiners) indicated by suppliers as having sources in the Covered Countries is as follows:

Based on the RMI RCOI Data (dated 1-17-20) 42 smelters or refiners were identified as sourcing from the Covered Countries. All were listed on the RMI Conflict-Free Smelter list.

Six suppliers indicated a gold smelter located in Uganda. According to the RMI Smelter database, the smelter RMAP Audit status is Outreach Required. Detailed sourcing information is not available at this time. RMI continues to urge them to participate in the program. Six suppliers indicated a gold smelter located in Zimbabwe. According to the RMI Smelter database, the smelter RMAP Audit status is Due Diligence Vetting Process. Detailed sourcing information is not available at this time. RMI continues to urge them to participate in the program.

Overall, of the 297 unique smelters identified by our suppliers and verified against RMI known smelters and refiners, 234 are listed as “Conformant” by RMI and 5 are “Active” (RMI Database 1-17-20).

**Table 1: Countries of Origin and Facilities Used to Process Conflict Minerals in CommScope Products**

The following Table represents the smelters and refiners provided by suppliers, verified against RMI known smelters and refiners.

LIST OF FACILITIES			
Smelter/Refinery Name	Conflict Mineral	Location	RMI ID
8853 S.p.A.	Gold	ITALY	CID002763
Abington Reldan Metals, LLC	Gold	UNITED STATES OF AMERICA	CID002708
Advanced Chemical Company	Gold	UNITED STATES OF AMERICA	CID000015
African Gold Refinery	Gold	UGANDA	CID003185
Aida Chemical Industries Co., Ltd.	Gold	JAPAN	CID000019

LIST OF FACILITIES			
Smelter/Refinery Name	Conflict Mineral	Location	RMI ID
Al Etihad Gold Refinery DMCC	Gold	UNITED ARAB EMIRATES	CID002560
Allgemeine Gold-und Silberscheideanstalt A.G.	Gold	GERMANY	CID000035
Almalyk Mining and Metallurgical Complex (AMMC)	Gold	UZBEKISTAN	CID000041
AngloGold Ashanti Corrego do Sitio Mineracao	Gold	BRAZIL	CID000058
Argor-Heraeus S.A.	Gold	SWITZERLAND	CID000077
Asahi Pretec Corp.	Gold	JAPAN	CID000082
Asahi Refining Canada Ltd.	Gold	CANADA	CID000924
Asahi Refining USA Inc.	Gold	UNITED STATES OF AMERICA	CID000920
Asaka Riken Co., Ltd.	Gold	JAPAN	CID000090
Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	Gold	TURKEY	CID000103
AU Traders and Refiners	Gold	SOUTH AFRICA	CID002850
Aurubis AG	Gold	GERMANY	CID000113
Bangalore Refinery	Gold	INDIA	CID002863
Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	Gold	PHILIPPINES	CID000128
Boliden AB	Gold	SWEDEN	CID000157
C. Hafner GmbH + Co. KG	Gold	GERMANY	CID000176
Caridad	Gold	MEXICO	CID000180
CCR Refinery - Glencore Canada Corporation	Gold	CANADA	CID000185
Cendres + Metaux S.A.	Gold	SWITZERLAND	CID000189
CGR Metalloys Pvt Ltd.	Gold	INDIA	CID003382
Chimet S.p.A.	Gold	ITALY	CID000233
Chugai Mining	Gold	JAPAN	CID000264
Daye Non-Ferrous Metals Mining Ltd.	Gold	CHINA	CID000343
Degussa Sonne / Mond Goldhandel GmbH	Gold	GERMANY	CID002867
Dijllah Gold Refinery FZC	Gold	UNITED ARAB EMIRATES	CID003348
DODUCO Contacts and Refining GmbH	Gold	GERMANY	CID000362
Dowa	Gold	JAPAN	CID000401
DS PRETECH Co., Ltd.	Gold	KOREA, REPUBLIC OF	CID003195
DSC (Do Sung Corporation)	Gold	KOREA, REPUBLIC OF	CID000359
Eco-System Recycling Co., Ltd. East Plant	Gold	JAPAN	CID000425
Eco-System Recycling Co., Ltd. North Plant	Gold	JAPAN	CID003424
Eco-System Recycling Co., Ltd. West Plant	Gold	JAPAN	CID003425
Emirates Gold DMCC	Gold	UNITED ARAB EMIRATES	CID002561
Fidelity Printers and Refiners Ltd.	Gold	ZIMBABWE	CID002515
Fujairah Gold FZC	Gold	UNITED ARAB EMIRATES	CID002584
GCC Gujrat Gold Centre Pvt. Ltd.	Gold	INDIA	CID002852
Geib Refining Corporation	Gold	UNITED STATES OF AMERICA	CID002459
Gold Refinery of Zijin Mining Group Co., Ltd.	Gold	CHINA	CID002243



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

LIST OF FACILITIES			
Smelter/Refinery Name	Conflict Mineral	Location	RMI ID
Materion	Gold	UNITED STATES OF AMERICA	CID001113
Matsuda Sangyo Co., Ltd.	Gold	JAPAN	CID001119
Metalor Technologies (Hong Kong) Ltd.	Gold	CHINA	CID001149
Metalor Technologies (Singapore) Pte., Ltd.	Gold	SINGAPORE	CID001152
Metalor Technologies (Suzhou) Ltd.	Gold	CHINA	CID001147
Metalor Technologies S.A.	Gold	SWITZERLAND	CID001153
Metalor USA Refining Corporation	Gold	UNITED STATES OF AMERICA	CID001157
Metalurgica Met-Mex Penoles S.A. De C.V.	Gold	MEXICO	CID001161
Mitsubishi Materials Corporation	Gold	JAPAN	CID001188
Mitsui Mining and Smelting Co., Ltd.	Gold	JAPAN	CID001193
MMTC-PAMP India Pvt., Ltd.	Gold	INDIA	CID002509
Modeltech Sdn Bhd	Gold	MALAYSIA	CID002857
Morris and Watson	Gold	NEW ZEALAND	CID002282
Moscow Special Alloys Processing Plant	Gold	RUSSIAN FEDERATION	CID001204
Nadir Metal Rafineri San. Ve Tic. A.S.	Gold	TURKEY	CID001220
Navoi Mining and Metallurgical Combinat	Gold	UZBEKISTAN	CID001236
NH Recytech Company	Gold	KOREA, REPUBLIC OF	CID003189
Nihon Material Co., Ltd.	Gold	JAPAN	CID001259
Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	Gold	AUSTRIA	CID002779
Ohura Precious Metal Industry Co., Ltd.	Gold	JAPAN	CID001325
OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	Gold	RUSSIAN FEDERATION	CID001326
OJSC Novosibirsk Refinery	Gold	RUSSIAN FEDERATION	CID000493
PAMP S.A.	Gold	SWITZERLAND	CID001352
Pease & Curren	Gold	UNITED STATES OF AMERICA	CID002872
Penglai Penggang Gold Industry Co., Ltd.	Gold	CHINA	CID001362
Planta Recuperadora de Metales SpA	Gold	CHILE	CID002919
Prioksky Plant of Non-Ferrous Metals	Gold	RUSSIAN FEDERATION	CID001386
PT Aneka Tambang (Persero) Tbk	Gold	INDONESIA	CID001397
PX Precinox S.A.	Gold	SWITZERLAND	CID001498
QG Refining, LLC	Gold	UNITED STATES OF AMERICA	CID003324
Rand Refinery (Pty) Ltd.	Gold	SOUTH AFRICA	CID001512
Refinery of Seemine Gold Co., Ltd.	Gold	CHINA	CID000522
REMONDIS PMR B.V.	Gold	NETHERLANDS	CID002582
Royal Canadian Mint	Gold	CANADA	CID001534
SAAMP	Gold	FRANCE	CID002761
Sabin Metal Corp.	Gold	UNITED STATES OF AMERICA	CID001546
Safimet S.p.A	Gold	ITALY	CID002973

LIST OF FACILITIES			
Smelter/Refinery Name	Conflict Mineral	Location	RMI ID
SAFINA A.S.	Gold	CZECHIA	CID002290
Sai Refinery	Gold	INDIA	CID002853
Samduck Precious Metals	Gold	KOREA, REPUBLIC OF	CID001555
Samwon Metals Corp.	Gold	KOREA, REPUBLIC OF	CID001562
SAXONIA Edelmetalle GmbH	Gold	GERMANY	CID002777
SEMPSA Joyeria Plateria S.A.	Gold	SPAIN	CID001585
Shandong Humon Smelting Co., Ltd.	Gold	CHINA	CID002525
Shandong Tiancheng Biological Gold Industrial Co., Ltd.	Gold	CHINA	CID001619
Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	Gold	CHINA	CID001622
Sichuan Tianze Precious Metals Co., Ltd.	Gold	CHINA	CID001736
Singway Technology Co., Ltd.	Gold	TAIWAN, PROVINCE OF CHINA	CID002516
SOE Shyolkovsky Factory of Secondary Precious Metals	Gold	RUSSIAN FEDERATION	CID001756
Solar Applied Materials Technology Corp.	Gold	TAIWAN, PROVINCE OF CHINA	CID001761
Sovereign Metals	Gold	INDIA	CID003383
State Research Institute Center for Physical Sciences and Technology	Gold	LITHUANIA	CID003153
Sudan Gold Refinery	Gold	SUDAN	CID002567
Sumitomo Metal Mining Co., Ltd.	Gold	JAPAN	CID001798
SungEel HiMetal Co., Ltd.	Gold	KOREA, REPUBLIC OF	CID002918
T.C.A S.p.A	Gold	ITALY	CID002580
Tanaka Kikinzoku Kogyo K.K.	Gold	JAPAN	CID001875
The Refinery of Shandong Gold Mining Co., Ltd.	Gold	CHINA	CID001916
Tokuriki Honten Co., Ltd.	Gold	JAPAN	CID001938
Tongling Nonferrous Metals Group Co., Ltd.	Gold	CHINA	CID001947
Tony Goetz NV	Gold	BELGIUM	CID002587
TOO Tau-Ken-Altyn	Gold	KAZAKHSTAN	CID002615
Torecom	Gold	KOREA, REPUBLIC OF	CID001955
Umicore Brasil Ltda.	Gold	BRAZIL	CID001977
Umicore Precious Metals Thailand	Gold	THAILAND	CID002314
Umicore S.A. Business Unit Precious Metals Refining	Gold	BELGIUM	CID001980
United Precious Metal Refining, Inc.	Gold	UNITED STATES OF AMERICA	CID001993
Valcambi S.A.	Gold	SWITZERLAND	CID002003
Western Australian Mint (T/a The Perth Mint)	Gold	AUSTRALIA	CID002030
WIELAND Edelmetalle GmbH	Gold	GERMANY	CID002778
Yamakin Co., Ltd.	Gold	JAPAN	CID002100
Yokohama Metal Co., Ltd.	Gold	JAPAN	CID002129
Yunnan Copper Industry Co., Ltd.	Gold	CHINA	CID000197
Zhongyuan Gold Smelter of Zhongjin Gold Corporation	Gold	CHINA	CID002224
Asaka Riken Co., Ltd.	Tantalum	JAPAN	CID000092

LIST OF FACILITIES			
Smelter/Refinery Name	Conflict Mineral	Location	RMI ID
Changsha South Tantalum Niobium Co., Ltd.	Tantalum	CHINA	CID000211
CP Metals Inc.	Tantalum	UNITED STATES OF AMERICA	CID003402
D Block Metals, LLC	Tantalum	UNITED STATES OF AMERICA	CID002504
Exotech Inc.	Tantalum	UNITED STATES OF AMERICA	CID000456
F&X Electro-Materials Ltd.	Tantalum	CHINA	CID000460
FIR Metals & Resource Ltd.	Tantalum	CHINA	CID002505
Global Advanced Metals Aizu	Tantalum	JAPAN	CID002558
Global Advanced Metals Boyertown	Tantalum	UNITED STATES OF AMERICA	CID002557
Guangdong Zhiyuan New Material Co., Ltd.	Tantalum	CHINA	CID000616
H.C. Starck Co., Ltd.	Tantalum	THAILAND	CID002544
H.C. Starck Hermsdorf GmbH	Tantalum	GERMANY	CID002547
H.C. Starck Inc.	Tantalum	UNITED STATES OF AMERICA	CID002548
H.C. Starck Ltd.	Tantalum	JAPAN	CID002549
H.C. Starck Smelting GmbH & Co. KG	Tantalum	GERMANY	CID002550
H.C. Starck Tantalum and Niobium GmbH	Tantalum	GERMANY	CID002545
Hengyang King Xing Lifeng New Materials Co., Ltd.	Tantalum	CHINA	CID002492
Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	Tantalum	CHINA	CID002512
Jiangxi Tuohong New Raw Material	Tantalum	CHINA	CID002842
JiuJiang JinXin Nonferrous Metals Co., Ltd.	Tantalum	CHINA	CID000914
Jiujiang Tanbre Co., Ltd.	Tantalum	CHINA	CID000917
Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	Tantalum	CHINA	CID002506
KEMET Blue Metals	Tantalum	MEXICO	CID002539
LSM Brasil S.A.	Tantalum	BRAZIL	CID001076
Metallurgical Products India Pvt., Ltd.	Tantalum	INDIA	CID001163
Mineracao Taboca S.A.	Tantalum	BRAZIL	CID001175
Mitsui Mining and Smelting Co., Ltd.	Tantalum	JAPAN	CID001192
Ningxia Orient Tantalum Industry Co., Ltd.	Tantalum	CHINA	CID001277
NPM Silmet AS	Tantalum	ESTONIA	CID001200
PRG Dooel	Tantalum	NORTH MACEDONIA, REPUBLIC OF	CID002847
QuantumClean	Tantalum	UNITED STATES OF AMERICA	CID001508
Resind Industria e Comercio Ltda.	Tantalum	BRAZIL	CID002707
Solikamsk Magnesium Works OAO	Tantalum	RUSSIAN FEDERATION	CID001769
Taki Chemical Co., Ltd.	Tantalum	JAPAN	CID001869
Telex Metals	Tantalum	UNITED STATES OF AMERICA	CID001891
Ulba Metallurgical Plant JSC	Tantalum	KAZAKHSTAN	CID001969
XinXing HaoRong Electronic Material Co., Ltd.	Tantalum	CHINA	CID002508
Yanling Jincheng Tantalum & Niobium Co., Ltd.	Tantalum	CHINA	CID001522
Alpha	Tin	UNITED STATES OF	CID000292

LIST OF FACILITIES			
Smelter/Refinery Name	Conflict Mineral	Location	RMI ID
		AMERICA	
An Vinh Joint Stock Mineral Processing Company	Tin	VIET NAM	CID002703
Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	Tin	CHINA	CID000228
Chifeng Dajingzi Tin Industry Co., Ltd.	Tin	CHINA	CID003190
China Tin Group Co., Ltd.	Tin	CHINA	CID001070
Dongguan CiEXPO Environmental Engineering Co., Ltd.	Tin	CHINA	CID003356
Dowa	Tin	JAPAN	CID000402
Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company	Tin	VIET NAM	CID002572
EM Vinto	Tin	BOLIVIA (PLURINATIONAL STATE OF)	CID000438
Estanho de Rondonia S.A.	Tin	BRAZIL	CID000448
Fenix Metals	Tin	POLAND	CID000468
Gejiu City Fuxiang Industry and Trade Co., Ltd.	Tin	CHINA	CID003410
Gejiu Kai Meng Industry and Trade LLC	Tin	CHINA	CID000942
Gejiu Non-Ferrous Metal Processing Co., Ltd.	Tin	CHINA	CID000538
Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	Tin	CHINA	CID001908
Gejiu Zili Mining And Metallurgy Co., Ltd.	Tin	CHINA	CID000555
Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	Tin	CHINA	CID003116
Guanyang Guida Nonferrous Metal Smelting Plant	Tin	CHINA	CID002849
HuiChang Hill Tin Industry Co., Ltd.	Tin	CHINA	CID002844
Huichang Jinshunda Tin Co., Ltd.	Tin	CHINA	CID000760
Jiangxi New Nanshan Technology Ltd.	Tin	CHINA	CID001231
Ma'anshan Weitai Tin Co., Ltd.	Tin	CHINA	CID003379
Magnu's Minerai's Metais e Ligas Ltda.	Tin	BRAZIL	CID002468
Malaysia Smelting Corporation (MSC)	Tin	MALAYSIA	CID001105
Melt Metais e Ligas S.A.	Tin	BRAZIL	CID002500
Metallic Resources, Inc.	Tin	UNITED STATES OF AMERICA	CID001142
Metallo Belgium N.V.	Tin	BELGIUM	CID002773
Metallo Spain S.L.U.	Tin	SPAIN	CID002774
Mineracao Taboca S.A.	Tin	BRAZIL	CID001173
Minsur	Tin	PERU	CID001182
Mitsubishi Materials Corporation	Tin	JAPAN	CID001191
Modeltech Sdn Bhd	Tin	MALAYSIA	CID002858
Nghe Tinh Non-Ferrous Metals Joint Stock Company	Tin	VIET NAM	CID002573
O.M. Manufacturing (Thailand) Co., Ltd.	Tin	THAILAND	CID001314
O.M. Manufacturing Philippines, Inc.	Tin	PHILIPPINES	CID002517
Operaciones Metalurgicas S.A.	Tin	BOLIVIA (PLURINATIONAL STATE OF)	CID001337
Pongpipat Company Limited	Tin	MYANMAR	CID003208
Precious Minerals and Smelting Limited	Tin	INDIA	CID003409
PT Artha Cipta Langgeng	Tin	INDONESIA	CID001399

LIST OF FACILITIES			
Smelter/Refinery Name	Conflict Mineral	Location	RMI ID
PT ATD Makmur Mandiri Jaya	Tin	INDONESIA	CID002503
PT Menara Cipta Mulia	Tin	INDONESIA	CID002835
PT Mitra Stania Prima	Tin	INDONESIA	CID001453
PT Refined Bangka Tin	Tin	INDONESIA	CID001460
PT Timah Tbk Kundur	Tin	INDONESIA	CID001477
PT Timah Tbk Mentok	Tin	INDONESIA	CID001482
Resind Industria e Comercio Ltda.	Tin	BRAZIL	CID002706
Rui Da Hung	Tin	TAIWAN, PROVINCE OF CHINA	CID001539
Soft Metais Ltda.	Tin	BRAZIL	CID001758
Super Ligas	Tin	BRAZIL	CID002756
Thai Nguyen Mining and Metallurgy Co., Ltd.	Tin	VIET NAM	CID002834
Thaisarco	Tin	THAILAND	CID001898
Tin Technology & Refining	Tin	UNITED STATES OF AMERICA	CID003325
Tuyen Quang Non-Ferrous Metals Joint Stock Company	Tin	VIET NAM	CID002574
White Solder Metalurgia e Mineracao Ltda.	Tin	BRAZIL	CID002036
Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	Tin	CHINA	CID002158
Yunnan Tin Company Limited	Tin	CHINA	CID002180
Yunnan Yunfan Non-ferrous Metals Co., Ltd.	Tin	CHINA	CID003397
A.L.M.T. Corp.	Tungsten	JAPAN	CID000004
ACL Metais Eireli	Tungsten	BRAZIL	CID002833
Asia Tungsten Products Vietnam Ltd.	Tungsten	VIET NAM	CID002502
Chenzhou Diamond Tungsten Products Co., Ltd.	Tungsten	CHINA	CID002513
China Molybdenum Co., Ltd.	Tungsten	CHINA	CID002641
Chongyi Zhangyuan Tungsten Co., Ltd.	Tungsten	CHINA	CID000258
CNMC (Guangxi) PGMA Co., Ltd.	Tungsten	CHINA	CID000281
Fujian Ganmin RareMetal Co., Ltd.	Tungsten	CHINA	CID003401
Fujian Jinxin Tungsten Co., Ltd.	Tungsten	CHINA	CID000499
Ganzhou Haichuang Tungsten Co., Ltd.	Tungsten	CHINA	CID002645
Ganzhou Huaxing Tungsten Products Co., Ltd.	Tungsten	CHINA	CID000875
Ganzhou Jiangwu Ferrotungsten Co., Ltd.	Tungsten	CHINA	CID002315
Ganzhou Seadragon W & Mo Co., Ltd.	Tungsten	CHINA	CID002494
Global Tungsten & Powders Corp.	Tungsten	UNITED STATES OF AMERICA	CID000568
Guangdong Xianglu Tungsten Co., Ltd.	Tungsten	CHINA	CID000218
H.C. Starck Smelting GmbH & Co. KG	Tungsten	GERMANY	CID002542
H.C. Starck Tungsten GmbH	Tungsten	GERMANY	CID002541
Hunan Chenzhou Mining Co., Ltd.	Tungsten	CHINA	CID000766
Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji	Tungsten	CHINA	CID002579
Hunan Chunchang Nonferrous Metals Co., Ltd.	Tungsten	CHINA	CID000769
Hunan Litian Tungsten Industry Co., Ltd.	Tungsten	CHINA	CID003182
Hydrometallurg, JSC	Tungsten	RUSSIAN FEDERATION	CID002649

LIST OF FACILITIES			
Smelter/Refinery Name	Conflict Mineral	Location	RMI ID
Japan New Metals Co., Ltd.	Tungsten	JAPAN	CID000825
Jiangwu H.C. Starck Tungsten Products Co., Ltd.	Tungsten	CHINA	CID002551
Jiangxi Gan Bei Tungsten Co., Ltd.	Tungsten	CHINA	CID002321
Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.	Tungsten	CHINA	CID002313
Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	Tungsten	CHINA	CID002318
Jiangxi Xianglu Tungsten Co., Ltd.	Tungsten	CHINA	CID002647
Jiangxi Xinsheng Tungsten Industry Co., Ltd.	Tungsten	CHINA	CID002317
Jiangxi Yaosheng Tungsten Co., Ltd.	Tungsten	CHINA	CID002316
JSC "Kirovgrad Hard Alloys Plant"	Tungsten	RUSSIAN FEDERATION	CID003408
Kennametal Fallon	Tungsten	UNITED STATES OF AMERICA	CID000966
Kennametal Huntsville	Tungsten	UNITED STATES OF AMERICA	CID000105
KGETS Co., Ltd.	Tungsten	KOREA, REPUBLIC OF	CID003388
Lianyou Metals Co., Ltd.	Tungsten	TAIWAN, PROVINCE OF CHINA	CID003407
Malipo Haiyu Tungsten Co., Ltd.	Tungsten	CHINA	CID002319
Masan Tungsten Chemical LLC (MTC)	Tungsten	VIET NAM	CID002543
Moliren Ltd.	Tungsten	RUSSIAN FEDERATION	CID002845
Niagara Refining LLC	Tungsten	UNITED STATES OF AMERICA	CID002589
Philippine Chuangxin Industrial Co., Inc.	Tungsten	PHILIPPINES	CID002827
Tejing (Vietnam) Tungsten Co., Ltd.	Tungsten	VIET NAM	CID001889
Unecha Refractory metals plant	Tungsten	RUSSIAN FEDERATION	CID002724
Wolfram Bergbau und Hutten AG	Tungsten	AUSTRIA	CID002044
Woltech Korea Co., Ltd.	Tungsten	KOREA, REPUBLIC OF	CID002843
Xiamen Tungsten (H.C.) Co., Ltd.	Tungsten	CHINA	CID002320
Xiamen Tungsten Co., Ltd.	Tungsten	CHINA	CID002082
Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.	Tungsten	CHINA	CID002830
Xinhai Rendan Shaoguan Tungsten Co., Ltd.	Tungsten	CHINA	CID002095

**Countries of origin for these facilities are believed to include:** Argentina, Armenia, Australia, Austria, Azerbaijan, Benin, Bolivia, Botswana, Brazil, Burkina Faso, Burundi, Canada, Chile, China, Colombia, Cyprus, Democratic Republic of the Congo, Dominican Republic, Ecuador, Egypt, Eritrea, Ethiopia, Finland, France, Georgia, Ghana, Guatemala, Guinea, Guyana, Honduras, India, Indonesia, Ivory Coast, Japan, Kazakhstan, Kenya, Kyrgyzstan, Laos, Lebanon, Madagascar, Malaysia, Mali, Mauritania, Mauritius, Mexico, Mongolia, Morocco, Mozambique, Myanmar, Namibia, Nicaragua, Niger, Nigeria, Papua New Guinea, Peru, Philippines, Portugal, Puerto Rico, Russian Federation, Rwanda, Saudi Arabia, Senegal, Sierra Leone, Slovakia, Solomon Islands, Somaliland, South Africa, Spain, Suriname, Swaziland, Sweden, Taiwan, Tanzania, Thailand, Togo, Turkey, Uganda, United Kingdom of Great Britain and Northern Ireland, United States of America, Uruguay, Uzbekistan, Venezuela, Vietnam, Zambia, Zimbabwe.

#### **Efforts to Determine the Conflict Minerals' Mine or Location of Origin**

Through our participation in the RMI and requiring our suppliers to complete the CMRT we have determined that seeking information about conflict mineral smelters and refiners in our supply chain represents the most reasonable effort we can make to determine the mines or locations of origin of the conflict minerals in our supply chain.