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

FORM SD

Specialized Disclosure Report

COMMSCOPE HOLDING COMPANY, INC.
(Exact name of registrant as specified in its charter)

Delaware
(State or Other Jurisdiction
of Incorporation)

001-36146
Commission File
Number

27-4332098
(IRS Employer
Identification No.)

3642 E. US Highway 70
Claremont, North Carolina 28610

(Addresses of principal executive offices)

Kyle Lorentzen
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.)

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, 2024.
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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, 2024. 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, 2024 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.

COMMSCOPE HOLDING COMPANY, INC.

Date: May 16, 2025

By: /s/ Kyle D. Lorentzen

Kyle D. Lorentzen
Executive Vice President and Chief Financial Officer

EXHIBIT INDEX

Exhibit No. **Description**

1.01 [Conflict Minerals Report for the Calendar Year ended December 31, 2024.](#)

**Conflict Minerals Report of CommScope Holding Company, Inc.
For the Calendar Year Ended December 31, 2024
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, 2024 to December 31, 2024 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 Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, third edition. The Policy is available on our website at <https://www.commscope.com/globalassets/digizuite/1015315-responsible-minerals-sourcing-policy.pdf>.

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 2024 within our operating segments (as reported in 2024) as follows:

- Connectivity and Cable Solutions (“CCS”) - Provides fiber optic and copper connectivity and cable solutions for use in telecommunications, cable television, residential broadband networks, data centers and business enterprises. The portfolio includes network solutions for indoor and outdoor network applications. Indoor network solutions include optical fiber and twisted pair structured cable solutions, intelligent infrastructure management hardware and software and network rack and cabinet enclosures. Outdoor network solutions are used in both local-area and wide-area networks and “last mile” fiber-to-the-home installations, including deployments of fiber-to-the-node, fiber-to-the-premises and fiber-to-the-distribution-point to homes, businesses and cell sites.
- Networking, Intelligent Cellular and Security Solutions (“NICS”) - Provides wireless networks for enterprises and service providers. Product offerings include indoor cellular solutions such as public key infrastructure solutions, indoor and outdoor Wi-Fi and long-term evolution access points, access and aggregation switches; an Internet of Things suite, on-premises and cloud-based control and management systems; and software and software-as-a-service applications addressing security, location, reporting and analytics.
- Access Network Solutions (“ANS”) - Includes cable modem termination systems, 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.

The Outdoor Wireless Networks (“OWN”) segment and Distribution Antenna Systems (“DAS”) business unit of our NICS segment focused on the macro and metro cell markets and includes base station antennas, RF filters, tower connectivity, microwave antennas, metro cell products, cabinets, steel, accessories, Spectrum Access Systems, Comsearch and distributed antenna systems. These businesses were reflected as discontinued operations in our Annual Report on Form 10-K for the year ended December 31, 2024 and were sold in the first quarter of 2025.

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 2024 products originated in the Democratic Republic of the Congo (“DRC”) and the adjoining countries (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, 17 CFR Parts 240 and 249b, 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 DRC or any of 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 RMI regarding processors of conflict minerals.

Our RCOI included:

- Identifying relevant in scope suppliers from our Enterprise Resource Planning 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 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. All smelters and refiners identified by our suppliers sourcing from Covered Countries are RMI conformant facilities.

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 the DRC or 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:
 - Responsible Minerals Sourcing 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 Responsible Minerals Sourcing."
 - Identifying and assessing conflict minerals risks in our supply chain.
 - Designing and implementing strategies to respond to conflict minerals risks identified.
 - Supplier agreement language that includes supplier responsible minerals sourcing requirements.
 - Utilizing a responsible minerals sourcing 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.
 - Contributing to independent third-party audits of the due diligence practices of conflict minerals facilities by participating in industry organizations.
 - Report on our conflict minerals supply chain due diligence activities.

2. Design and implementation of a strategy to respond to identified risks

We follow the OECD Due Diligence Guidance for Responsible Supply Chains Five-Step Framework, step #2 Identify and assess risk in the supply chain. 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 Responsible 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 utilize 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 2025:

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 compliance with our responsible minerals requirements.
3. Review and follow-up with suppliers on reported unknown, incorrect and high-risk facilities.
4. As applicable, review unresponsive or high-risk suppliers to determine if alternative sourcing is available.

DUE DILIGENCE RESULTS

We had a response rate of 100% to our supplier RCOI and due diligence performed for facilities indicated by suppliers.

Based on the RMI RCOI Data (dated April 28, 2025) 39 smelters or refiners were identified as sourcing from the Covered Countries and all 39 are conformant according to RMI.

Overall, of the 348 unique smelters identified by our suppliers and verified against RMI known smelters and refiners, 216 are listed as “Conformant” by RMI (including the 39 identified as sourcing from Covered Countries) and 7 are “Active” (RMI Smelter Database, dated April 28, 2025). The remaining smelter statuses have various statuses according to RMI.

COUNTRIES OF ORIGIN AND FACILITIES USED TO PROCESS CONFLICT MINERALS IN COMMSCOPE PRODUCTS

The following list represents the facilities 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
ABC Refinery Pty Ltd.	Gold	AUSTRALIA	CID002920
Abington Reldan Metals, LLC	Gold	UNITED STATES OF AMERICA	CID002708
Advanced Chemical Company	Gold	UNITED STATES OF AMERICA	CID000015
Agosi AG	Gold	GERMANY	CID000035
Aida Chemical Industries Co., Ltd.	Gold	JAPAN	CID000019
Al Etihad Gold Refinery DMCC	Gold	UNITED ARAB EMIRATES	CID002560
Albino Mountinho Lda.	Gold	PORTUGAL	CID002760
Alexy Metals	Gold	UNITED STATES OF AMERICA	CID003500
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 METALFINE, Inc.	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
Attero Recycling Pvt Ltd	Gold	INDIA	CID004697
AU Traders and Refiners	Gold	SOUTH AFRICA	CID002850
Augmont Enterprises Private Limited	Gold	INDIA	CID003461
Aurubis AG	Gold	GERMANY	CID000113
Bangalore Refinery	Gold	INDIA	CID002863
Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	Gold	PHILIPPINES	CID000128

List of facilities			
Smelter/Refinery Name	Conflict Mineral	Location	RMI ID
Boliden Ronnskar	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
Coimpa Industrial LTDA	Gold	BRAZIL	CID004010
Degussa Sonne / Mond Goldhandel GmbH	Gold	GERMANY	CID002867
Dijllah Gold Refinery FZC	Gold	UNITED ARAB EMIRATES	CID003348
Dongwu Gold Group	Gold	CHINA	CID003663
Dowa	Gold	JAPAN	CID000401
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
Elite Industech Co., Ltd.	Gold	TAIWAN, PROVINCE OF CHINA	CID004755
Emerald Jewel Industry India Limited (Unit 1)	Gold	INDIA	CID003487
Emerald Jewel Industry India Limited (Unit 2)	Gold	INDIA	CID003488
Emerald Jewel Industry India Limited (Unit 3)	Gold	INDIA	CID003489
Emerald Jewel Industry India Limited (Unit 4)	Gold	INDIA	CID003490
Emirates Gold DMCC	Gold	UNITED ARAB EMIRATES	CID002561
Fujairah Gold FZC	Gold	UNITED ARAB EMIRATES	CID002584
GG Refinery Ltd.	Gold	TANZANIA	CID004506

List of facilities			
Smelter/Refinery Name	Conflict Mineral	Location	RMI ID
GGC Gujrat Gold Centre Pvt. Ltd.	Gold	INDIA	CID002852
Gold by Gold Colombia	Gold	COLOMBIA	CID003641
Gold Coast Refinery	Gold	GHANA	CID003186
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 Germany GmbH Co. KG	Gold	GERMANY	CID000711
Heraeus Metals Hong Kong Ltd.	Gold	CHINA	CID000707
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
Impala Platinum - Base Metal Refinery (BMR)	Gold	SOUTH AFRICA	CID004604
Impala Platinum - Platinum Metals Refinery (PMR)	Gold	SOUTH AFRICA	CID004714
Impala Platinum - Rustenburg Smelter	Gold	SOUTH AFRICA	CID004610
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
JALAN & Company	Gold	INDIA	CID002893
Japan Mint	Gold	JAPAN	CID000823
Jiangxi Copper Co., Ltd.	Gold	CHINA	CID000855
JSC Ekaterinburg Non-Ferrous Metal Processing Plant	Gold	RUSSIAN FEDERATION	CID000927

List of facilities			
Smelter/Refinery Name	Conflict Mineral	Location	RMI ID
JSC Novosibirsk Refinery	Gold	RUSSIAN FEDERATION	CID000493
JX Advanced Metals Corporation	Gold	JAPAN	CID000937
K.A. Rasmussen	Gold	NORWAY	CID003497
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
KP Sanghvi International Pvt Ltd	Gold	INDIA	CID004433
Kundan Care Products Ltd.	Gold	INDIA	CID003463
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 MnM 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
Materion	Gold	UNITED STATES OF AMERICA	CID001113
Matsuda Sangyo Co., Ltd.	Gold	JAPAN	CID001119
MD Overseas	Gold	INDIA	CID003548
Metal Concentrators SA (Pty) Ltd.	Gold	SOUTH AFRICA	CID003575

List of facilities			
Smelter/Refinery Name	Conflict Mineral	Location	RMI ID
Metallix Refining Inc.	Gold	UNITED STATES OF AMERICA	CID003557
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
Minera Titan del Peru SRL (MTP) - Belen Plant	Gold	PERU	CID005014
Mitsubishi Materials Corporation	Gold	JAPAN	CID001188
Mitsui Mining and Smelting Co., Ltd.	Gold	JAPAN	CID001193
MKS PAMP SA	Gold	SWITZERLAND	CID001352
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
NOBLE METAL SERVICES	Gold	UNITED STATES OF AMERICA	CID003690
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
Pease & Curren	Gold	UNITED STATES OF AMERICA	CID002872
Penglai Penggang Gold Industry Co., Ltd.	Gold	CHINA	CID001362

List of facilities			
Smelter/Refinery Name	Conflict Mineral	Location	RMI ID
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
SAFINA A.S.	Gold	CZECHIA	CID002290
Sai Refinery	Gold	INDIA	CID002853
SAM Precious Metals FZ-LLC	Gold	UNITED ARAB EMIRATES	CID003666
Samduck Precious Metals	Gold	KOREA, REPUBLIC OF	CID001555
Samwon Metals Corp.	Gold	KOREA, REPUBLIC OF	CID001562
SEMPSA Joyeria Plateria S.A.	Gold	SPAIN	CID001585
Shandong Gold Smelting Co., Ltd.	Gold	CHINA	CID001916
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
Shenzhen CuiLu Gold Co., Ltd.	Gold	CHINA	CID002750
SHENZHEN JINJUNWEI RESOURCE COMPREHENSIVE DEVELOPMENT CO., LTD.	Gold	CHINA	CID004435
Shenzhen Zhonghenglong Real Industry Co., Ltd.	Gold	CHINA	CID002527

List of facilities			
Smelter/Refinery Name	Conflict Mineral	Location	RMI ID
Shirpur Gold Refinery Ltd.	Gold	INDIA	CID002588
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
Sumitomo Metal Mining Co., Ltd.	Gold	JAPAN	CID001798
SungEel HiMetal Co., Ltd.	Gold	KOREA, REPUBLIC OF	CID002918
Super Dragon Technology Co., Ltd.	Gold	TAIWAN, PROVINCE OF CHINA	CID001810
T.C.A S.p.A	Gold	ITALY	CID002580
Tanaka Kikinzoku Kogyo K.K.	Gold	JAPAN	CID001875
TITAN COMPANY LIMITED, JEWELLERY DIVISION	Gold	INDIA	CID004491
Tokuriki Honten Co., Ltd.	Gold	JAPAN	CID001938
Tongling Nonferrous Metals Group Co., Ltd.	Gold	CHINA	CID001947
TOO Tau-Ken-Altyn	Gold	KAZAKHSTAN	CID002615
Torecom	Gold	KOREA, REPUBLIC OF	CID001955
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
WEEEREFINING	Gold	FRANCE	CID003615
Western Australian Mint (T/a The Perth Mint)	Gold	AUSTRALIA	CID002030
WIELAND Edelmetalle GmbH	Gold	GERMANY	CID002778
Yamakin Co., Ltd.	Gold	JAPAN	CID002100

List of facilities			
Smelter/Refinery Name	Conflict Mineral	Location	RMI ID
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
Zijin Mining Group Gold Smelting Co. Ltd.	Gold	CHINA	CID002243
5D Production OU	Tantalum	ESTONIA	CID003926
AMG Brasil	Tantalum	BRAZIL	CID001076
Changsha South Tantalum Niobium Co., Ltd.	Tantalum	CHINA	CID000211
D Block Metals, LLC	Tantalum	UNITED STATES OF AMERICA	CID002504
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 Rising Rare Metals-EO Materials Ltd.	Tantalum	CHINA	CID000291
Hengyang King Xing Lifeng New Materials Co., Ltd.	Tantalum	CHINA	CID002492
Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	Tantalum	CHINA	CID002512
Jiangxi Suns Nonferrous Materials Co. Ltd.	Tantalum	CHINA	CID004813
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 de Mexico	Tantalum	MEXICO	CID002539
Materion Newton Inc.	Tantalum	UNITED STATES OF AMERICA	CID002548
Metallurgical Products India Pvt., Ltd.	Tantalum	INDIA	CID001163
Mineracao Taboca S.A.	Tantalum	BRAZIL	CID001175
Mitsui Mining and Smelting Co., Ltd.	Tantalum	JAPAN	CID001192

List of facilities			
Smelter/Refinery Name	Conflict Mineral	Location	RMI ID
Ningxia Orient Tantalum Industry Co., Ltd.	Tantalum	CHINA	CID001277
NPM Silmet AS	Tantalum	ESTONIA	CID001200
PowerX Ltd.	Tantalum	RWANDA	CID004054
QSIL Metals Hermsdorf GmbH	Tantalum	GERMANY	CID002547
QuantumClean	Tantalum	UNITED STATES OF AMERICA	CID001508
Resind Industria e Comercio Ltda.	Tantalum	BRAZIL	CID002707
RFH Yancheng Jinye New Material Technology Co., Ltd.	Tantalum	CHINA	CID003583
Solikamsk Magnesium Works OAO	Tantalum	RUSSIAN FEDERATION	CID001769
Taki Chemical Co., Ltd.	Tantalum	JAPAN	CID001869
TANIOBIS Co., Ltd.	Tantalum	THAILAND	CID002544
TANIOBIS GmbH	Tantalum	GERMANY	CID002545
TANIOBIS Japan Co., Ltd.	Tantalum	JAPAN	CID002549
TANIOBIS Smelting GmbH & Co. KG	Tantalum	GERMANY	CID002550
Telex Metals	Tantalum	UNITED STATES OF AMERICA	CID001891
Ulba Metallurgical Plant JSC	Tantalum	KAZAKHSTAN	CID001969
XIMEI RESOURCES (GUANGDONG) LIMITED	Tantalum	CHINA	CID000616
Yanling Jincheng Tantalum & Niobium Co., Ltd.	Tantalum	CHINA	CID001522
Zhuzhou Cemented Carbide Group Co., Ltd.	Tantalum	CHINA	CID002232
Alpha Assembly Solutions Inc	Tin	UNITED STATES OF AMERICA	CID000292
An Vinh Joint Stock Mineral Processing Company	Tin	VIET NAM	CID002703
Aurubis Beerse	Tin	BELGIUM	CID002773
Aurubis Berango	Tin	SPAIN	CID002774
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

List of facilities			
Smelter/Refinery Name	Conflict Mineral	Location	RMI ID
CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda	Tin	BRAZIL	CID003486
CRM Synergies	Tin	SPAIN	CID003524
CV Ayi Jaya	Tin	INDONESIA	CID002570
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
Fabrica Auricchio Industria e Comercio Ltda.	Tin	BRAZIL	CID003582
Feinhutte Halsbrucke GmbH	Tin	GERMANY	CID000466
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
Global Advanced Metals Greenbushes Pty Ltd.	Tin	AUSTRALIA	CID004754
Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	Tin	CHINA	CID003116
HuiChang Hill Tin Industry Co., Ltd.	Tin	CHINA	CID002844
Jean Goldschmidt International (JGI Hydrometal)	Tin	BELGIUM	CID000835
Jiangxi New Nanshan Technology Ltd.	Tin	CHINA	CID001231
Longnan Chuangyue Environmental Protection Technology Development Co., Ltd	Tin	CHINA	CID004796
Luna Smelter, Ltd.	Tin	RWANDA	CID003387
Ma'anshan Weitai Tin Co., Ltd.	Tin	CHINA	CID003379
Magnu's Mineraiis Metais e Ligas Ltda.	Tin	BRAZIL	CID002468

List of facilities			
Smelter/Refinery Name	Conflict Mineral	Location	RMI ID
Malaysia Smelting Corporation (MSC)	Tin	MALAYSIA	CID001105
Malaysia Smelting Corporation Berhad (Port Klang)	Tin	MALAYSIA	CID004434
Melt Metais e Ligas S.A.	Tin	BRAZIL	CID002500
Metallic Resources, Inc.	Tin	UNITED STATES OF AMERICA	CID001142
Mineracao Taboca S.A.	Tin	BRAZIL	CID001173
Mining Minerals Resources SARL	Tin	CONGO, DEMOCRATIC REPUBLIC OF THE	CID004065
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
Novosibirsk Tin Combine	Tin	RUSSIAN FEDERATION	CID001305
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 ATD Makmur Mandiri Jaya	Tin	INDONESIA	CID002503
PT Bangka Prima Tin	Tin	INDONESIA	CID002776
PT Cipta Persada Mulia	Tin	INDONESIA	CID002696
PT Masbro Alam Stania	Tin	INDONESIA	CID003380
PT Mitra Stania Prima	Tin	INDONESIA	CID001453
PT Mitra Sukses Globalindo	Tin	INDONESIA	CID003449
PT Premium Tin Indonesia	Tin	INDONESIA	CID000313
PT Prima Timah Utama	Tin	INDONESIA	CID001458
PT Putera Sarana Shakti (PT PSS)	Tin	INDONESIA	CID003868

List of facilities			
Smelter/Refinery Name	Conflict Mineral	Location	RMI ID
PT Rajehan Ariq	Tin	INDONESIA	CID002593
PT Timah Tbk Kundur	Tin	INDONESIA	CID001477
PT Timah Tbk Mentok	Tin	INDONESIA	CID001482
Resind Industria e Comercio Ltda.	Tin	BRAZIL	CID002706
Rian Resources SDN. BHD.	Tin	MALAYSIA	CID003581
RIKAYAA GREENTECH PRIVATE LIMITED	Tin	INDIA	CID004692
Rui Da Hung	Tin	TAIWAN, PROVINCE OF CHINA	CID001539
Soft Metais Ltda.	Tin	BRAZIL	CID001758
Super Ligas	Tin	BRAZIL	CID002756
Takehara PVD Materials Plant / PVD Materials Division of MITSUI MINING & SMELTING CO., LTD.	Tin	JAPAN	CID004403
Thaisarco	Tin	THAILAND	CID001898
Tin Smelting Branch of Yunnan Tin Co., Ltd.	Tin	CHINA	CID002180
Tin Technology & Refining	Tin	UNITED STATES OF AMERICA	CID003325
Tuyen Quang Non-Ferrous Metals Joint Stock Company	Tin	VIET NAM	CID002574
VQB Mineral and Trading Group JSC	Tin	VIET NAM	CID002015
White Solder Metalurgia e Mineracao Ltda.	Tin	BRAZIL	CID002036
Woodcross Smelting Company Limited	Tin	UGANDA	CID004724
Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	Tin	CHINA	CID002158
Yunnan Yunfan Non-ferrous Metals Co., Ltd.	Tin	CHINA	CID003397
A.L.M.T. Corp.	Tungsten	JAPAN	CID000004
ACL Metais Eireli	Tungsten	BRAZIL	CID002833
Albasteel Industria e Comercio de Ligas Para Fundicao Ltd.	Tungsten	BRAZIL	CID003427
Artek LLC	Tungsten	RUSSIAN FEDERATION	CID003553
Asia Tungsten Products Vietnam Ltd.	Tungsten	VIET NAM	CID002502

List of facilities			
Smelter/Refinery Name	Conflict Mineral	Location	RMI ID
China Molybdenum Tungsten Co., Ltd.	Tungsten	CHINA	CID002641
Chongyi Zhangyuan Tungsten Co., Ltd.	Tungsten	CHINA	CID000258
CNMC (Guangxi) PGMA Co., Ltd.	Tungsten	CHINA	CID000281
Cronimet Brasil Ltda	Tungsten	BRAZIL	CID003468
DONGKUK INDUSTRIES CO., LTD.	Tungsten	KOREA, REPUBLIC OF	CID004060
Fujian Xinlu Tungsten Co., Ltd.	Tungsten	CHINA	CID003609
Ganzhou Jiangwu Ferrotungsten Co., Ltd.	Tungsten	CHINA	CID002315
Ganzhou Seadragon W & Mo Co., Ltd.	Tungsten	CHINA	CID002494
Global Tungsten & Powders LLC	Tungsten	UNITED STATES OF AMERICA	CID000568
Guangdong Xianglu Tungsten Co., Ltd.	Tungsten	CHINA	CID000218
H.C. Starck Tungsten GmbH	Tungsten	GERMANY	CID002541
HANNAE FOR T Co., Ltd.	Tungsten	KOREA, REPUBLIC OF	CID003978
Hubei Green Tungsten Co., Ltd.	Tungsten	CHINA	CID003417
Hunan Jintai New Material Co., Ltd.	Tungsten	CHINA	CID000769
Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch	Tungsten	CHINA	CID002513
Hydrometallurg, JSC	Tungsten	RUSSIAN FEDERATION	CID002649
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 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
KENEE MINING VIETNAM COMPANY LIMITED	Tungsten	VIET NAM	CID004619

List of facilities			
Smelter/Refinery Name	Conflict Mineral	Location	RMI ID
Kennametal Fallon	Tungsten	UNITED STATES OF AMERICA	CID000966
Kennametal Huntsville	Tungsten	UNITED STATES OF AMERICA	CID000105
LAOS SOUTHERN MINING SMELTING SOLE CO.,LTD	Tungsten	LAOS	CID005017
Lianyou Metals Co., Ltd.	Tungsten	TAIWAN, PROVINCE OF CHINA	CID003407
Lianyou Resources Co., Ltd.	Tungsten	TAIWAN, PROVINCE OF CHINA	CID004397
MALAMET SMELTING SDN. BHD.	Tungsten	MALAYSIA	CID004056
Malipo Haiyu Tungsten Co., Ltd.	Tungsten	CHINA	CID002319
Masan High-Tech Materials	Tungsten	VIET NAM	CID002543
Moliren Ltd.	Tungsten	RUSSIAN FEDERATION	CID002845
Nam Viet Cromit Joint Stock Company	Tungsten	VIET NAM	CID004034
Niagara Refining LLC	Tungsten	UNITED STATES OF AMERICA	CID002589
NPP Tyazhmetprom LLC	Tungsten	RUSSIAN FEDERATION	CID003416
OOO "Technolom" 1	Tungsten	RUSSIAN FEDERATION	CID003614
OOO "Technolom" 2	Tungsten	RUSSIAN FEDERATION	CID003612
Philippine Bonway Manufacturing Industrial Corporation	Tungsten	PHILIPPINES	CID004797
Philippine Carreytech Metal Corp.	Tungsten	PHILIPPINES	CID004438
Philippine Chuangxin Industrial Co., Inc.	Tungsten	PHILIPPINES	CID002827
Sanher Tungsten Vietnam Co., Ltd.	Tungsten	VIET NAM	CID002538
Shinwon Tungsten (Fujian Shanghang) Co., Ltd.	Tungsten	CHINA	CID004430
TANIOBIS Smelting GmbH & Co. KG	Tungsten	GERMANY	CID002542
Tungsten Vietnam Joint Stock Company	Tungsten	VIET NAM	CID003993
Unecha Refractory metals plant	Tungsten	RUSSIAN FEDERATION	CID002724
Wolfram Bergbau und Hutten AG	Tungsten	AUSTRIA	CID002044
Xiamen Tungsten (H.C.) Co., Ltd.	Tungsten	CHINA	CID002320
Xiamen Tungsten Co., Ltd.	Tungsten	CHINA	CID002082

List of facilities			
Smelter/Refinery Name	Conflict Mineral	Location	RMI ID
YUDU ANSHENG TUNGSTEN CO., LTD.	Tungsten	CHINA	CID003662

Countries of origin for these facilities are believed to include: Andorra, Australia, Austria, Belgium, Bolivia (Plurinational State Of), Brazil, Canada, Chile, China, Colombia, Democratic Republic of the Congo, Czechia, Estonia, France, Germany, Ghana, India, Indonesia, Italy, Japan, Kazakhstan, Republic Of Korea, Kyrgyzstan, Malaysia, Mexico, Myanmar, Netherlands, New Zealand, Norway, Peru, Philippines, Poland, Portugal, Russian Federation, Rwanda, Singapore, South Africa, Spain, Sweden, Switzerland, Taiwan (Province Of China), Tanzania, Thailand, Turkey, Uganda, United Arab Emirates, United States of America, Uzbekistan, Viet Nam.

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.