# UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Washington, D.C. 20549

# Form SD

# SPECIALIZED DISCLOSURE REPORT

# Radware Ltd.

(Exact Name of Registrant as Specified in Charter)

Israel 000-30324 N/A

(State or Other Jurisdiction of Incorporation)

(Commission File No.)

(I.R.S. Employer Identification Number)

22 Raoul Wallenberg Street, Tel Aviv, Israel (Address of Principal Executive Offices)

**6971917** (Zip Code)

Doron Abramovitch Chief Financial Officer +972-3-7668666

(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:

 $\boxtimes$  Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from: January 1 to December 31, 2017.

#### CAUTIONARY STATEMENT REGARDING FORWARD-LOOKING STATEMENTS

Except for the historical information contained herein, the statements contained in this report (including exhibits) may contain forward-looking statements, within the meaning of the Private Securities Litigation Reform Act of 1995. Actual outcomes could differ materially from those anticipated in these forward-looking statements as a result of various factors.

We urge you to consider that statements which use the terms "believe," "do not believe," "expect," "plan," "intend," "estimate," "anticipate," and similar expressions are intended to identify forward-looking statements. Examples of forward-looking statements include statements relating to our future plans, and any other statement that does not directly relate to any historical or current fact. These statements reflect our current views, expectations and assumptions with respect to future events, are based on assumptions, are subject to risks and uncertainties and may not prove to be accurate. These risks and uncertainties, as well as others, are discussed in greater detail in Radware's latest Annual Report on Form 20-F and Radware's other filings with, or submissions to, the Securities and Exchange Commission ("SEC"). Readers are cautioned not to place undue reliance on these forward-looking statements, which speak only as of the date hereof.

Except as required by applicable law, we do not intend to update or revise any forward-looking statements, whether as a result of new information, future events or otherwise.

#### INTRODUCTION

This Specialized Disclosure Report on Form SD (this "Form SD") of Radware Ltd. ("Radware," the "Company" or "we") for the year ended December 31, 2017 is presented to comply with Rule 13p-1 promulgated under the Securities Exchange Act of 1934, as amended (the "Rule").

The Rule was adopted by the SEC to implement reporting and disclosure requirements related to "conflict minerals" originating in the Democratic Republic of the Congo or an adjoining country (collectively referred to as the "Covered Countries"), as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010.

In connection with the Rule, we have adopted a policy with respect to our sourcing of conflict minerals. The full text of our Conflict Minerals Policy is available on our website at <a href="https://www.radware.com/corporategovernance/conflictminerals/">https://www.radware.com/corporategovernance/conflictminerals/</a>. The content of any website referred to in this Form SD is included for general information only and is not incorporated by reference herein.

#### Section 1 - Conflict Minerals Disclosure

# <u>Item 1.01 - Conflict Minerals Disclosures and Report</u>

In accordance with the Rule and our Conflict Minerals Policy, we have evaluated our current product lines. As more fully described in the Conflict Minerals Report, filed as Exhibit 1.01 hereto (the "Conflict Minerals Report"), our supply chain is very complex and, despite having conducted a good faith reasonable country of origin inquiry ("RCOI"), we currently do not have sufficient information from our suppliers or other sources to determine the country of origin of the conflict minerals used in our products or identify the facilities used to process those conflict minerals. Therefore, we cannot rule out the possibility that some conflict minerals in these products did, or may have, originated in the Covered Countries and are not from recycled or scrap resources. Accordingly, as required by applicable SEC rules, we have also conducted certain due diligence activities, as more fully described in the Conflict Minerals Report. These due diligence efforts have been conducted in parallel with our RCOI and, as such, there is significant overlap between our RCOI efforts and the due diligence measures we employed.

#### **Conflict Minerals Disclosure**

Copies of this Form SD and the Company's Conflict Minerals Report, filed as Exhibit 1.01 hereto, are publicly available at <a href="https://www.radware.com/corporategovernance/conflictminerals/#">https://www.radware.com/corporategovernance/conflictminerals/#</a>.

#### Item 1.02 - Exhibit

See the Company's Conflict Minerals Report, 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 duly caused this report to be signed on its behalf by the duly authorized undersigned.

RADWARE LTD.

Date: May 29, 2018

By: /s/ Doron Abramovitch
Doron Abramovitch
Chief Financial Officer

Exhibit 1.01

# Radware Ltd. Conflict Minerals Report For The Year Ended December 31, 2017

This Conflict Minerals Report for the year ended December 31, 2017 (this "Report") has been prepared by Radware Ltd. ("Radware," the "Company" or "we") pursuant to Rule 13p-1 (the "Rule" or "Rule 13p-1") promulgated under the Securities Exchange Act of 1934, as amended, and Form SD thereunder.

The Rule was adopted by the Securities and Exchange Commission ("SEC") to implement reporting and disclosure requirements related to "conflict minerals" as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. Conflict minerals are defined by the SEC as columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives, which are limited to tantalum, tin, tungsten and Gold ("conflict minerals" or "3TG").

In general, if an SEC registrant, like Radware, has reason to believe that any of the conflict minerals in its supply chain may have originated in the Democratic Republic of the Congo ("DRC") or an adjoining country (collectively referred to as the "Covered Countries"), or if the registrant is unable to determine the country of origin of those conflict minerals, then the registrant must exercise due diligence on the conflict minerals' source and chain of custody, and submit a Conflict Minerals Report to the SEC that includes a description of those due diligence measures.

This Report relates to the process undertaken for Radware's products that were manufactured or contracted to be manufactured, during calendar year 2017 and that may contain 3TG minerals and that are necessary to the functionality or production of the products manufactured or to the products contracted to be manufactured.

A copy of this Report, as well as the Form SD that we filed with the SEC, is available on our website at <a href="https://www.radware.com/corporategovernance/conflictminerals/">https://www.radware.com/corporategovernance/conflictminerals/</a>.

Unless otherwise defined herein, defined terms used in this Report have the meaning ascribed to such terms in the Rule and Form SD as well as SEC Release No. 34-67716 issued by the SEC on August 22, 2012.

Except as set forth otherwise in this Report, Radware has provided information as of the date of this Report. Subsequent events, such as the inability or unwillingness of any suppliers, smelters or refiners to comply with Radware's Conflict Minerals Policy, may affect Radware's future determinations under Rule 13p-1.

As part of Radware's Labor Practice and Human Rights Policy, Radware respects the protection of human rights, including the basic human rights of employees and workers. The Company aims to uphold the human rights of those affected by its business activities, and in particular, of the workers engaged in its supply chain. Accordingly, the Company aspires to source components and materials from suppliers that share our values regarding respect for human rights, integrity and environmental responsibility, and that comply with applicable legal standards and requirements.

#### 1. Overview

#### Company Overview

We are a provider of cyber security and application delivery solutions that help our customers to secure the digital experience for users of business-critical applications in virtual, cloud and software defined data centers. Our solutions are deployed by, among others, enterprises, carriers and cloud service providers. We offer a set of solutions that are designed to ensure application service levels are guaranteed at all times, in any operational scenario, and to optimize business operations, minimize service delivery degradation and prevent downtime. Our solutions are offered in three main categories including products, product subscriptions and services. We sell our products primarily to independent distributors, including value added resellers (VARs), original equipment manufacturers (OEMs) and system integrators, whereas most of our direct sales are to strategic customers. For more information about Radware, please visit <a href="https://www.radware.com">www.radware.com</a>. The content of any website referred to in this Report is included for general information only and is not incorporated by reference herein.

# **Supply Chain**

We conducted an analysis of our products and found that small quantities of 3TG could potentially be found in our products, although in small quantities.

The products that we manufacture are highly complex, typically containing thousands of parts from direct suppliers. In general, we primarily rely on third-party assembly and manufacturing vendors to provide our finished products and, in this respect, these vendors typically receive components and subassemblies included in our products from other suppliers and subcontractors.

We have relationships with a network of suppliers throughout the world and there are generally multiple tiers between the 3TG mines and our direct suppliers. Therefore, we must rely on our direct suppliers to cooperate with us and work with their own upstream suppliers or sub-contractors in order that they may provide us with accurate information about the origin of 3TG in the components we purchase from them. In particular, many of our supplier contracts have fixed durations and we cannot unilaterally impose new contract terms or flow-down requirements that would otherwise compel these suppliers to support our due diligence efforts with respect to 3TG content. However, as we enter into new supply contracts or renew existing supply contracts, we seek to add, where feasible, a conflict minerals contract clause that requires the relevant supplier to provide us with information about the source of 3TG and relevant smelters and refiners.

#### Reasonable Country of Origin Inquiry (RCOI)

We have determined that requesting our suppliers to complete the CMRT (as defined below) as well as following the steps described under Section 2 below (Due Diligence Process), represent our reasonable efforts to determine the mines or locations of origin of 3TG in our supply chain.

We developed a risk-based approach (pareto analysis) that focuses on the suppliers that represented as of December 31, 2017, in aggregate, at least 90% of our spend on the manufacturing costs of our finished products that were shipped in 2017. We identified in total 5 relevant suppliers (the "Relevant Suppliers"), compared with 184 in our Conflict Minerals Report for the year ended December 31, 2016, and engaged a third party data collection and software vendor (the "Third Party Vendor") to monitor the due diligence process and the gathering of information from all such Relevant Suppliers. The decrease in the number of Relevant Suppliers compared to 2016 primarily derives from accepting the CMRTs of our original design manufacturer ("ODMs") suppliers and focusing on strategic suppliers that we purchase from directly. We changed our approach and accepted the CMRTs of our ODMs based on our agreement with such ODMs pursuant to which they assumed responsibility over their sub-suppliers.

We sent letters to our Relevant Suppliers to explain the Rule and to refer them to online training materials and instructions. We also solicited information from our Relevant Suppliers, using the most up to date Conflict Minerals Reporting Template version 5.01 and above ("CMRT"), an industry-standard template for conflict mineral reporting developed by the Responsible Minerals Initiative (formerly known as the Conflict-Free Sourcing Initiative, or CFSI) (the "RMI").

We reviewed the responses that we received and followed up on what we perceived as inconsistent, incomplete, or inaccurate responses, as well as sent reminders to suppliers who did not respond to our requests for information. Out of the 5 Relevant Suppliers, 5 Relevant Suppliers (100%) completed and returned CMRTs to us.

Based on these efforts, we believe that some of our products may contain conflict minerals that originated in Covered Countries and are not from recycled or scrap sources. Therefore, according to the Rule, we have engaged in the Due Diligence Process described in detail in Section 2 below.

# 2. Due Diligence Process

# 2.1 Design of Due Diligence

Our due diligence measures have been designed to conform, in all material respects, with the internationally recognized due diligence framework prescribed by the Organization for Economic Cooperation and Development ("OECD") known as "Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas" and related Supplements for Tin, Tantalum and Tungsten and for Gold (the "OECD Guidance"). We designed our due diligence measures according to the recommendations of the OECD Guidance for downstream companies that have no direct relationships to smelters or refiners.

#### 2.2 Due Diligence Performed

#### 2.2.1 Establish Strong Management Systems

#### Corporate Policy

We have adopted a conflict minerals policy (our "Policy" or our "Conflict Minerals Policy") that is aimed at achieving responsible sourcing. The Policy is publicly available on our website at <a href="https://www.radware.com/corporategovernance/conflictminerals/">https://www.radware.com/corporategovernance/conflictminerals/</a>.

#### Internal Team

We have established a management system to support supply chain due diligence related to 3TG. Our management system includes a steering committee headed by the Company's Legal Department (the "CM Steering Committee"), and a team of subject matter functions such as supplier management, operations and legal.

#### **Supply Chain Control Systems and Transparency**

We requested that all Relevant Suppliers provide information to us regarding 3TG and relevant smelters or refiners using the CMRT.

We adopted, and communicated to our suppliers and to the public through our website and direct letters, our Policy for the sourcing of minerals originating from conflict affected and high-risk areas that are under scrutiny for human right abuses, i.e. the DRC and Covered Countries.

Controls included a company-wide code of conduct that outlines expected behaviors from all our employees as well as engaging a Third Party Vendor to assist us in collecting and analyzing relevant data and in maintaining a smelter or refiner database.

#### Grievance Mechanism

Our Conflict Minerals Policy is available to the public on our website and provides the contact details for reporting concerns or questions regarding the Policy or violations thereof. Suppliers and other external parties are encouraged to contact their regular sourcing channel if they wish to seek guidance on the application of this approach, or if they wish to report a grievance in relation to our Conflict Minerals Policy.

#### **Maintaining Records**

We maintain data records relating to our due diligence efforts in the Third Party Vendor's Conflict Minerals Reporting Dashboard Software ("CMR Dashboard") for the five (5) year duration recommended by the OECD Guidance. The CMR Dashboard stores current and former CMRTs received from suppliers to maintain traceability and transparency.

#### **Supplier Engagement**

We maintain an electronic portal that directs suppliers to resources related to Conflict Minerals, including FAQs from the SEC.

We established a Conflict Minerals webpage to host our Conflict Minerals Policy and our conflict minerals reports along with their related Form SDs.

We have also engaged the Third Party Vendor to provide training and outreach to suppliers, as well as to conduct, collect, validate and archive supplier responses.

As we enter into new supply contracts or renew existing supply contracts, we seek to add, where feasible, a conflict minerals contract clause that requires suppliers to provide us with information about the source of 3TG and relevant smelters or refiners.

#### 2.2.2 Identify and Assess Risks in the Supply Chain

We approached our 5 Relevant Suppliers and received responses from 5 Relevant Suppliers representing 100% of the Relevant Suppliers as described in the RCOI. We reviewed and analyzed the respective CMRTs of our Relevant Suppliers and compared the information provided therein with the Standard Smelter List of Compliant and Active Smelters from the Responsible Minerals Assurance Process (RMAP), a list issued by RMI that aims to identify smelters and refiners that have systems in place to assure the sourcing of conflict-free materials. We rely on these Relevant Suppliers, whose components contain 3TG, to provide us with information about the source of conflict minerals contained in the components supplied to us. Our Relevant Suppliers are similarly reliant upon information provided by their suppliers.

#### 2.2.3 Design and Implement a Strategy to Respond to Risks

We implemented the following strategy to address the results of our risk assessment described in Section 2.2.2 above. The goal of the design and implementation strategy is not to eliminate sourcing from the DRC and Covered Countries, but to encourage participation with the RMI and other relevant bodies, where possible:

The CM Steering Committee held meetings to review progress and assess the risks identified.

We reviewed the responses that we received and followed up on what we perceived to be inconsistent, incomplete, or inaccurate responses, as well as sent reminders to Relevant Suppliers who did not respond to our requests for information.

We sent, where applicable, follow up letters to unresponsive Relevant Suppliers and to Relevant Suppliers who declared they sourced conflict minerals from Covered Countries, asking them to complete their due diligence process in order to validate that all smelters in Covered Countries are compliant with RMI or other independent conflict free smelter validation programs, such as the London Bullion Market (LBMA) or the Responsible Jewelry Council (RJC).

Relevant senior management, including our Vice President and General Counsel, was briefed on our due diligence efforts, risk analysis results and mitigation efforts.

We approached Relevant Suppliers that we identified as possibly sourcing from smelters or refiners located in the Covered Countries that did not receive a conflict free designation from the RMI, and asked for a corrective action plan.

#### 2.2.4 Carry out Independent Third Party Audit of Smelters/Refiners Due Diligence Practices

We rely on industry-wide initiatives, such as RMI, to conduct risk assessments at the upstream level.

Since we do not have direct sourcing relationships with conflict mineral smelters or refiners, we did not perform direct audits of these entities within our supply chain.

#### 2.2.5 Report on Supply Chain Due Diligence

Our supply chain conflict mineral due diligence efforts are described in this report. This Conflict Minerals Report is available on our website <a href="https://www.radware.com/corporategovernance/conflictminerals/">https://www.radware.com/corporategovernance/conflictminerals/</a> and is filed with the SEC.

#### 3. Results of Assessment

Based on information provided by our Relevant Suppliers as well as by RMI, the results of our due diligence investigation on the dates covered by this Report, are as follows:

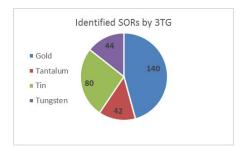
We were successful in approaching all Relevant Suppliers.

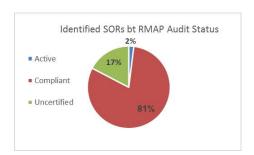
Out of the 5 Relevant Suppliers, 5 Relevant Suppliers (100%) completed and returned the CMRTs to us. Based on the CMRTs we received from these Relevant Suppliers (the "Responsive Relevant Suppliers"):

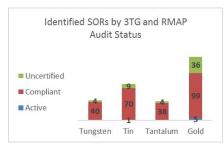
o 100% of the responses received provided data at a company or user-defined level. None of the remaining Responsive Relevant Suppliers declared that information was provided at a product level, as shown in the following table:

Category	Percentage of Responsive Relevant Suppliers
Company level	80% (4 out of 5 suppliers)
User defined	20% (1 out of 5 suppliers)
Product list	0% (0 out of 5 suppliers)

We identified 306 smelters or refiners that may be involved in our supply chain, out of which 83% are either recognized as conflict free by RMI (each a "Compliant Smelter") or are committed to undergo an RMAP audit. Analysis of information about these 306 smelters is provided in the following diagrams:







Based on the information provided by the Responsive Relevant Suppliers as well as by RMI, as of the date of this Report, Radware believes that the facilities that may have been used to process the conflict minerals in Radware's products may include the smelters and refiners listed in <u>Annex I</u> below.

Based on the information provided by the Responsive Relevant Suppliers as well as by RMI, as of the date of this Report, Radware believes that the countries of origin of the conflict minerals contained in its products may include the countries listed in <u>Annex II</u> below.

The information gathered from our Responsive Relevant Suppliers is not collected on a continuous, real-time basis.

In addition, Radware can only provide reasonable and good faith, yet not absolute, assurance regarding the source and chain of custody of the necessary conflict minerals, since the information comes primarily from direct and secondary suppliers as well as from independent third party audit programs.

Lastly, given that most of our Responsive Relevant Suppliers were unable to provide information at product level, Radware cannot clearly identify the source or origin of the 3TG included in its products.

#### 4. Future Risk Mitigation Efforts

We currently intend to continue working with our global supply chain to achieve responsible sourcing of minerals from conflict areas and comply with applicable regulations to the extent that they are required:

Continue implementing risk management measurement and follow up processes with regard to non-responsive or non-compliant suppliers.

As described in our Conflict Minerals Policy, to the extent we have reason to believe that any of our suppliers supply us with 3TG, receive such minerals from sources that may support conflict in the DRC or any adjoining country, we would encourage such suppliers to establish an alternative source of 3TG that does not support such conflict, as outlined in the OECD Guidance. Such methods are important to us as we are committed to discouraging human rights abuses.

Continue to include or attempt to include a conflict minerals flow-down clause in new or renewed supplier contracts.

Continue to direct our suppliers through our website and direct communications to information and training resources to attempt to increase the response rate and improve the content of the supplier survey responses.

Request suppliers to procure materials through validated smelters pursuant to the RMI or other approved resources and request our suppliers to take mitigating actions in case they do not.

Continue to validate supplier responses using information collected via independent conflict free smelter validation programs, such RMI's RMAP program.

Continue to engage in regular and ongoing risk assessment through our suppliers' annual data submissions.

# Annex I - List of Smelters

Metal	Smelter Look-Up	Smelter Country
Gold	Advanced Chemical Company	UNITED STATES OF AMERICA
Gold	Aida Chemical Industries Co., Ltd.	JAPAN
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	Asaka Riken Co., Ltd.	JAPAN
Gold	Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	TURKEY
Gold	Aurubis AG	GERMANY
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES
Gold	Boliden AB	SWEDEN
Gold	C. Hafner GmbH + Co. KG	GERMANY
Gold	Caridad	MEXICO
Gold	CCR Refinery - Glencore Canada Corporation	CANADA
Gold	Cendres + Metaux S.A.	SWITZERLAND
Gold	Yunnan Copper Industry Co., Ltd.	CHINA
Gold	Chimet S.p.A.	ITALY
Gold	Chugai Mining	JAPAN
Gold	Daejin Indus Co., Ltd.	KOREA, REPUBLIC OF
Gold	Daye Non-Ferrous Metals Mining Ltd.	CHINA
Gold	DSC (Do Sung Corporation)	KOREA, REPUBLIC OF
Gold	DODUCO GmbH	GERMANY
Gold	Dowa	JAPAN
Gold	Eco-System Recycling Co., Ltd.	JAPAN
Gold	OJSC Novosibirsk Refinery	RUSSIAN FEDERATION
	8	

Gold	Gansu Seemine Material Hi-Tech Co., Ltd.	CHINA
Gold	Guoda Safina High-Tech Environmental Refinery Co., Ltd.	CHINA
Gold	Hangzhou Fuchunjiang Smelting Co., Ltd.	CHINA
Gold	HeeSung Metal Ltd.	KOREA, REPUBLIC OF
Gold	Heimerle + Meule GmbH	GERMANY
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GoldHeimerle + Meule GmbHGERMANYGoldHeraeus Metals Hong Kong Ltd.CHINAGoldHeraeus Precious Metals GmbH & Co. KGGERMANYGoldHunan Chenzhou Mining Co., Ltd.CHINA

Gold HwaSeong CJ CO., LTD. KOREA, REPUBLIC OF

 Gold
 Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.
 CHINA

 Gold
 Ishifuku Metal Industry Co., Ltd.
 JAPAN

 Gold
 Istanbul Gold Refinery
 TURKEY

 Gold
 Japan Mint
 JAPAN

 Gold
 Jiangxi Copper Co., Ltd.
 CHINA

Gold Asahi Refining USA Inc. UNITED STATES OF AMERICA

Gold Asahi Refining Canada Ltd. CANADA

Gold JSC Ekaterinburg Non-Ferrous Metal Processing Plant RUSSIAN FEDERATION
Gold JSC Uralelectromed RUSSIAN FEDERATION

Gold JX Nippon Mining & Metals Co., Ltd. JAPAN

GoldKazakhmys Smelting LLCKAZAKHSTANGoldKazzincKAZAKHSTAN

Gold Kennecott Utah Copper LLC UNITED STATES OF AMERICA

 Gold
 Kojima Chemicals Co., Ltd.
 JAPAN

 Gold
 Kyrgyzaltyn JSC
 KYRGYZSTAN

 Gold
 L'azurde Company For Jewelry
 SAUDI ARABIA

Gold Lingbao Gold Co., Ltd. CHINA

Gold Lingbao Jinyuan Tonghui Refinery Co., Ltd. CHINA

Gold LS-NIKKO Copper Inc. KOREA, REPUBLIC OF

Gold	Luoyang Zijin Yinhui Gold Refinery Co., Ltd.	CHINA
Gold	Materion	UNITED STATES OF AMERICA
Gold	Matsuda Sangyo Co., Ltd.	JAPAN
Gold	Metalor Technologies (Suzhou) Ltd.	CHINA
Gold	Metalor Technologies (Hong Kong) Ltd.	CHINA
Gold	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE
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	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	Nihon Material Co., Ltd.	JAPAN
Gold	Elemetal Refining, LLC	UNITED STATES OF AMERICA
Gold	Ohura Precious Metal Industry Co., Ltd.	JAPAN
Gold	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	RUSSIAN FEDERATION
Gold	PAMP S.A.	SWITZERLAND
Gold	Penglai Penggang Gold Industry Co., Ltd.	CHINA
Gold	Prioksky Plant of Non-Ferrous Metals	RUSSIAN FEDERATION
Gold	PT Aneka Tambang (Persero) Tbk	INDONESIA
Gold	PX Precinox S.A.	SWITZERLAND
Gold	Rand Refinery (Pty) Ltd.	SOUTH AFRICA
Gold	Royal Canadian Mint	CANADA
Gold	Sabin Metal Corp.	UNITED STATES OF AMERICA
Gold	Samduck Precious Metals	KOREA, REPUBLIC OF
Gold	Samwon Metals Corp.	KOREA, REPUBLIC OF

Gold	Schone Edelmetaal B.V.	NETHERLANDS
Gold	SEMPSA Joyeria Plateria S.A.	SPAIN
Gold	Shandong Tiancheng Biological Gold Industrial Co., Ltd.	CHINA
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CHINA
Gold	Sichuan Tianze Precious Metals Co., Ltd.	CHINA
Gold	So Accurate Group, Inc.	UNITED STATES OF AMERICA
Gold	SOE Shyolkovsky Factory of Secondary Precious Metals	RUSSIAN FEDERATION
Gold	Solar Applied Materials Technology Corp.	TAIWAN, PROVINCE OF CHINA
Gold	Sumitomo Metal Mining Co., Ltd.	JAPAN
Gold	Tanaka Kikinzoku Kogyo K.K.	JAPAN
Gold	Great Wall Precious Metals Co., Ltd. of CBPM	CHINA
Gold	The Refinery of Shandong Gold Mining Co., Ltd.	CHINA
Gold	Tokuriki Honten Co., Ltd.	JAPAN
Gold	Tongling Nonferrous Metals Group Co., Ltd.	CHINA
Gold	Torecom	KOREA, REPUBLIC OF
Gold	Umicore Brasil Ltda.	BRAZIL
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	Yamamoto Precious Metal Co., Ltd.	JAPAN
Gold	Yokohama Metal Co., Ltd.	JAPAN
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CHINA
Gold	Morris and Watson	NEW ZEALAND
Gold	SAFINA A.S.	CZECH REPUBLIC
Gold	Guangdong Jinding Gold Limited	CHINA
Gold	Umicore Precious Metals Thailand	THAILAND
Gold	Geib Refining Corporation	UNITED STATES OF AMERICA

Gold	MMTC-PAMP India Pvt., Ltd.	INDIA
Gold	Republic Metals Corporation	UNITED STATES OF AMERICA
Gold	KGHM Polska Miedz Spolka Akcyjna	POLAND
Gold	Fidelity Printers and Refiners Ltd.	ZIMBABWE
Gold	Singway Technology Co., Ltd.	TAIWAN, PROVINCE OF CHINA
Gold	Al Etihad Gold LLC	UNITED ARAB EMIRATES
Gold	Emirates Gold DMCC	UNITED ARAB EMIRATES
Gold	Kaloti Precious Metals	UNITED ARAB EMIRATES
Gold	Sudan Gold Refinery	SUDAN
Gold	T.C.A S.p.A	ITALY
Gold	Remondis Argentia B.V.	NETHERLANDS
Gold	Tony Goetz NV	BELGIUM
Gold	Korea Zinc Co., Ltd.	KOREA, REPUBLIC OF
Gold	Marsam Metals	BRAZIL
Gold	TOO Tau-Ken-Altyn	KAZAKHSTAN
Gold	Abington Reldan Metals, LLC	UNITED STATES OF AMERICA
Gold	SAAMP	FRANCE
Gold	Italpreziosi	ITALY
Gold	SAXONIA Edelmetalle GmbH	GERMANY
Gold	WIELAND Edelmetalle GmbH	GERMANY
Gold	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	AUSTRIA
Gold	AU Traders and Refiners	SOUTH AFRICA
Gold	GCC Gujrat Gold Centre Pvt. Ltd.	INDIA
Gold	Sai Refinery	INDIA
Gold	Universal Precious Metals Refining Zambia	ZAMBIA
Gold	Modeltech Sdn Bhd	MALAYSIA
Gold	Bangalore Refinery	INDIA
Gold	Kyshtym Copper-Electrolytic Plant ZAO	RUSSIAN FEDERATION

Gold SungEel HiTech KOREA, REPUBLIC OF

 Tantalum
 Asaka Riken Co., Ltd.
 JAPAN

 Tantalum
 Changsha South Tantalum Niobium Co., Ltd.
 CHINA

 Tantalum
 Changsha South Tantalum Niobium Co., Ltd.
 CHINA

 Tantalum
 Conghua Tantalum and Niobium Smeltry
 CHINA

Tantalum D Block Metals, LLC UNITED STATES OF AMERICA

Tantalum Duoluoshan CHINA

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
 Guangdong Zhiyuan New Material Co., Ltd.
 CHINA

 Tantalum
 H.C. Starck Co., Ltd.
 THAILAND

 Tantalum
 H.C. Starck Hermsdorf GmbH
 GERMANY

Tantalum H.C. Starck Inc. UNITED STATES OF AMERICA

Tantalum H.C. Starck Ltd. JAPAN Tantalum H.C. Starck Smelting GmbH & Co. KG GERMANY Tantalum H.C. Starck Tantalum and Niobium GmbH GERMANY Tantalum Hengyang King Xing Lifeng New Materials Co., Ltd. CHINA CHINA Tantalum Jiangxi Dinghai Tantalum & Niobium Co., Ltd. CHINA Tantalum Jiangxi Tuohong New Raw Material CHINA Tantalum JiuJiang JinXin Nonferrous Metals Co., Ltd. Tantalum Jiujiang Nonferrous Metals Smelting Company Limited CHINA Tantalum Jiujiang Zhongao Tantalum & Niobium Co., Ltd. CHINA Tantalum KEMET Blue Metals MEXICO

Tantalum KEMET Blue Powder UNITED STATES OF AMERICA

TantalumKing-Tan Tantalum Industry Ltd.CHINATantalumLSM Brasil S.A.BRAZILTantalumMetallurgical 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 Power Resources Ltd. MACEDONIA, THE FORMER YUGOSLAV REPUBLIC OF

Tantalum QuantumClean UNITED STATES OF AMERICA

 Tantalum
 Resind Industria e Comercio Ltda.
 BRAZII

 Tantalum
 RFH Tantalum Smeltry Co., Ltd.
 CHINA

Tantalum Solikamsk Magnesium Works OAO RUSSIAN FEDERATION

Tantalum Taki Chemical Co., Ltd. JAPAN

Tantalum Telex Metals UNITED STATES OF AMERICA

Tantalum Ulba Metallurgical Plant JSC KAZAKHSTAN

 Tantalum
 XinXing HaoRong Electronic Material Co., Ltd.
 CHINA

 Tantalum
 Yichun Jin Yang Rare Metal Co., Ltd.
 CHINA

Tin Alpha UNITED STATES OF AMERICA

VIET NAM Tin An Vinh Joint Stock Mineral Processing Company Tin Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. CHINA CHINA Tin China Tin Group Co., Ltd. Tin CNMC (Guangxi) PGMA Co., Ltd. CHINA Tin CV Ayi Jaya INDONESIA Tin CV Dua Sekawan INDONESIA CV Gita Pesona INDONESIA Tin Tin CV Serumpun Sebalai INDONESIA Tin CV Tiga Sekawan INDONESIA CV United Smelting INDONESIA Tin Tin CV Venus Inti Perkasa INDONESIA Tin Dowa JAPAN

Tin Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company VIET NAM

Tin	Elmet S.L.U.	SPAIN
Tin	EM Vinto	BOLIVIA (PLURINATIONAL STATE OF)
Tin	Estanho de Rondonia S.A.	BRAZIL
Tin	Fenix Metals	POLAND
Tin	Gejiu Fengming Metallurgy Chemical Plant	CHINA
Tin	Gejiu Jinye Mineral Company	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	Guanyang Guida Nonferrous Metal Smelting Plant	CHINA
Tin	HuiChang Hill Tin Industry Co., Ltd.	CHINA
Tin	Huichang Jinshunda Tin Co., Ltd.	CHINA
Tin	Jiangxi Ketai Advanced Material 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-Chimique N.V.	BELGIUM
Tin	Mineracao Taboca S.A.	BRAZIL
Tin	Minsur	PERU
Tin	Mitsubishi Materials Corporation	JAPAN
Tin	Modeltech Sdn Bhd	MALAYSIA
Tin	Nankang Nanshan Tin Manufactory Co., Ltd.	CHINA
Tin	Nghe Tinh Non-Ferrous Metals Joint Stock Company	VIET NAM
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND
Tin	O.M. Manufacturing Philippines, Inc.	PHILIPPINES

Tin	Operaciones Metalurgical S.A.	BOLIVIA (PLURINATIONAL STATE OF)
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 Bangka Prima Tin	INDONESIA
Tin	PT Bangka Tin Industry	INDONESIA
Tin	PT Belitung Industri Sejahtera	INDONESIA
Tin	PT Bukit Timah	INDONESIA
Tin	PT DS Jaya Abadi	INDONESIA
Tin	PT Eunindo Usaha Mandiri	INDONESIA
Tin	PT Inti Stania Prima	INDONESIA
Tin	PT Karimun Mining	INDONESIA
Tin	PT Kijang Jaya Mandiri	INDONESIA
Tin	PT Lautan Harmonis Sejahtera	INDONESIA
Tin	PT Menara Cipta Mulia	INDONESIA
Tin	PT Mitra Stania Prima	INDONESIA
Tin	PT O.M. Indonesia	INDONESIA
Tin	PT Panca Mega Persada	INDONESIA
Tin	PT Prima Timah Utama	INDONESIA
Tin	PT Refined Bangka Tin	INDONESIA
Tin	PT Sariwiguna Binasentosa	INDONESIA
Tin	PT Stanindo Inti Perkasa	INDONESIA
Tin	PT Sukses Inti Makmur	INDONESIA
Tin	PT Sumber Jaya Indah	INDONESIA
Tin	PT Timah (Persero) Tbk Kundur	INDONESIA
Tin	PT Timah (Persero) Tbk Mentok	INDONESIA
Tin	PT Tinindo Inter Nusa	INDONESIA

Tin PT Tommy Utama INDONESIA

Tin Resind Industria e Comercio Ltda. BRAZIL

Tin Rui Da Hung TAIWAN, PROVINCE OF CHINA

BRAZIL

BRAZIL

Tin Soft Metais Ltda.

Tin Super Ligas
Tin Thaisarco

 Tin
 Thaisarco
 THAILAND

 Tin
 Tuyen Quang Non-Ferrous Metals Joint Stock Company
 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

 Tungsten
 A.L.M.T. TUNGSTEN Corp.
 JAPAN

 Tungsten
 ACL Metais Eireli
 BRAZIL

Tungsten Asia Tungsten Products Vietnam Ltd. VIET NAM

Tungsten Chenzhou Diamond Tungsten Products Co., Ltd. CHINA

Tungsten Chongyi Zhangyuan Tungsten Co., Ltd. CHINA

Tungsten Fujian Jinxin Tungsten Co., Ltd. CHINA

TungstenGanzhou Huaxing Tungsten Products Co., Ltd.CHINATungstenGanzhou Jiangwu Ferrotungsten Co., Ltd.CHINATungstenGanzhou Seadragon W & Mo Co., Ltd.CHINATungstenGanzhou Yatai Tungsten Co., Ltd.CHINA

Tungsten Global Tungsten & Powders Corp. UNITED STATES OF AMERICA

Guangdong Xianglu Tungsten Co., Ltd. CHINA Tungsten Tungsten H.C. Starck Smelting GmbH & Co. KG GERMANY GERMANY Tungsten H.C. Starck Tungsten GmbH Hunan Chenzhou Mining Co., Ltd. CHINA Tungsten Tungsten Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji CHINA CHINA Hunan Chunchang Nonferrous Metals Co., Ltd. Tungsten

Tungsten Hydrometallurg, JSC RUSSIAN FEDERATION

Tungsten Japan New Metals Co., Ltd. JAPAN

Tungsten Jiangwu H.C. Starck Tungsten Products Co., Ltd. CHINA Tungsten Jiangxi Dayu Longxintai Tungsten Co., Ltd. CHINA CHINA Jiangxi Gan Bei Tungsten Co., Ltd. Tungsten 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 Xiushui Xianggan Nonferrous Metals Co., Ltd. CHINA CHINA Tungsten Jiangxi Yaosheng Tungsten Co., Ltd.

 Tungsten
 Kennametal Fallon
 UNITED STATES OF AMERICA

 Tungsten
 Kennametal Huntsville
 UNITED STATES OF AMERICA

Tungsten Malipo Haiyu Tungsten Co., Ltd. CHINA

Tungsten Moliren Ltd. RUSSIAN FEDERATION

Tungsten Niagara Refining LLC UNITED STATES OF AMERICA

 Tungsten
 Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC
 VIET NAM

 Tungsten
 Philippine Chuangxin Industrial Co., Inc.
 PHILIPPINES

 Tungsten
 South-East Nonferrous Metal Company Limited of Hengyang City
 CHINA

 Tungsten
 Tejing (Vietnam) Tungsten Co., Ltd.
 VIET NAM

Tungsten Unecha Refractory metals plant RUSSIAN FEDERATION

Tungsten Vietnam Youngsun Tungsten Industry Co., Ltd. VIET NAM

Tungsten Wolfram Bergbau und Hutten AG AUSTRIA

Tungsten Woltech Korea Co., Ltd. KOREA, REPUBLIC OF

 Tungsten
 Xiamen Tungsten (H.C.) Co., Ltd.
 CHINA

 Tungsten
 Xiamen Tungsten Co., Ltd.
 CHINA

 Tungsten
 Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.
 CHINA

Tungsten Xinhai Rendan Shaoguan Tungsten Co., Ltd. CHINA

# Annex II - Country of Origin Inquiry (COO)

Gold	Tantalum	Tin	Tungsten
AFGHANISTAN	AUSTRALIA	ARGENTINA	AUSTRALIA
ALBANIA	BOLIVIA	AUSTRIA	BOLIVIA
ARGENTINA	BRAZIL	BELGIUM	CANADA
AUSTRALIA	BURUNDI	BOLIVIA	CHINA
AUSTRIA	CANADA	BRAZIL	DEMOCRATIC REPUBLIC OF CONGO
AZERBAIJAN	CHINA	BURUNDI	INDONESIA
BELGIUM	DEMOCRATIC REPUBLIC OF CONGO	CAMBODIA	MOZAMBIQUE
BERMUDA	ЕТНІОРІА	CANADA	PERU
BOLIVIA	GERMANY	CHILE	PORTUGAL
BRAZIL	INDIA	CHINA	RUSSIAN FEDERATION
BULGARIA	JAPAN	COLOMBIA	SPAIN
BURKINA FASO	KAZAKHSTAN	ECUADOR	UNITED STATES OF AMERICA
CAMBODIA	MOZAMBIQUE	ETHIOPIA	VIETNAM
CANADA	NAMIBIA	GERMANY	
CHILE	NIGERIA	GUYANA	
CHINA	PORTUGAL	HUNGARY	
DOMINICAN REPUBLIC	RUSSIAN FEDERATION	INDIA	
ECUADOR	RWANDA	INDONESIA	
ETHIOPIA	SIERRA LEONE	JAPAN	
FINLAND	SPAIN	KAZAKHSTAN	
GERMANY	THAILAND	LAOS	
GHANA	UNITED STATES OF AMERICA	LUXEMBOURG	
GUINEA	VIETNAM	MALAYSIA	

GUYANA	MONGOLIA	
HUNGARY	MYANMAR	
INDIA	NAMIBIA	
INDONESIA	PAPUA NEW GUINEA	
IRELAND	PERU	
ITALY	PORTUGAL	
JAPAN	RUSSIAN FEDERATION	
KAZAKHSTAN	RWANDA	
KENYA	TAIWAN	
KYRGYZSTAN	THAILAND	
LAOS	THE REPUBLIC OF KOREA	
LIBERIA	UGANDA	
LUXEMBOURG	UNITED STATES OF AMERICA	
MALAYSIA	VIET NAM	
MAURITANIA		
MEXICO		
MONGOLIA		
MOZAMBIQUE		
MYANMAR		
NAMIBIA		
PERU		
RUSSIAN FEDERATION		
SINGAPORE		
SOUTH AFRICA		

SPAIN		
SWEDEN		
SWITZERLAND		
TAIWAN		
TANZANIA		
THE NETHERLANDS		
THE REPUBLIC OF KOREA		
TURKEY		
UNITED KINGDOM		
UNITED STATES OF AMERICA		
UZBEKISTAN		
VIETNAM		
ZIMBABWE		