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

**Form SD**

**SPECIALIZED DISCLOSURE REPORT**

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**Radware Ltd.**

(Exact Name of Registrant as Specified in Charter)

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<b>Israel</b> (State or Other Jurisdiction of Incorporation)	<b>000-30324</b> (Commission File No.)	<b>N/A</b> (I.R.S. Employer Identification Number)
<b>22 Raoul Wallenberg Street, Tel Aviv, Israel</b> (Address of Principal Executive Offices)		<b>6971917</b> (Zip Code)

**Guy Avidan**  
**Chief Financial Officer**  
**+972-3-7668666**

(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, 2021.

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## 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”, “our” or “we”) for the year ended December 31, 2021 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” as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (“Dodd-Frank Act”). Conflict minerals are defined by the SEC as columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives, which are limited to tantalum, tin, and tungsten, originating in the Democratic Republic of the Congo (“DRC”) or an adjoining country (collectively referred to as the “Covered Countries”), as directed by the Rule.

Our responsible sourcing efforts were designed to align, in all material respects, with the Organization for Economic Co-operation and Development (“OECD”) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (2016) and related Supplements (the “OECD Guidance”). The OECD Guidance distinguishes between the roles of and the corresponding due diligence recommendations addressed to upstream companies and downstream companies in the supply chain, whereby “upstream” generally means the mineral supply chain from the mine to smelters or refineries, and “downstream” generally means the minerals supply chain from smelters/refiners to retailers. Accordingly, 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 refineries as we believe that we qualify as a “downstream” company.

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 and previously filed Conflict Minerals Reports are available on our website at <https://www.radware.com/corporategovernance/conflictminerals>

*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**

### **Item 1.01 – Conflict Minerals Disclosures and Report**

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, as a downstream company, we are several tiers removed from smelters and refiners and do not have direct business relationships with smelters or refiners. In particular, the Company and our suppliers purchase cassiterite, columbite-tantalite (coltan), wolframite, gold, or their derivatives, which presently are limited to tin, tantalum, tungsten, and gold (collectively "3TG") -related materials after processing by smelters or refiners. As a result, despite having conducted a good faith reasonable country of origin inquiry ("RCOI"), we currently do not have sufficient information from our suppliers or independent third party audit bodies ("Third Party Audit") or other sources to determine the precise country of origin of the conflict minerals used in our products or to identify the facilities used, or likely used, to process those conflict minerals, and we must rely on our In-Scope Suppliers, as defined in the Conflict Minerals Report, to provide information on their upstream supplier sourcing.

In light of the above, we cannot rule out the possibility that some conflict minerals in these products originated, or may have originated, in the DRC or other Covered Countries and are not from entirely recycled or scrap resources. Accordingly, as required by the Rule and in accordance with the OECD Guidance, we have conducted certain due diligence activities, as more fully described in the Conflict Minerals Report. The boundaries and extent of the RCOI inquiry are established in the due diligence management systems, and the efforts to determine the reasonable country of origin of the necessary Conflict Minerals is implemented in unison with the due diligence steps. Therefore, 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 <https://www.radware.com/corporategovernance/conflictminerals>.

### **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 16, 2022

By: /s/ Guy Avidan  
Guy Avidan  
Chief Financial Officer

**Radware Ltd.  
Conflict Minerals Report  
For The Year Ended December 31, 2021**

This Conflict Minerals Report for the year ended December 31, 2021 (this "Report") has been prepared by Radware Ltd. ("Radware," the "Company", "our" 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 a 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") and that such conflict minerals may not originate entirely from recycled or scrap sources, 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 as well as measures to address and analyze risks in its supply chain.

This Report relates to the process undertaken for Radware's products that were manufactured or contracted to be manufactured during the calendar year 2021 and that may contain 3TG minerals that are necessary to the functionality or production of such 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, are available on our website at <https://www.radware.com/corporategovernance/conflictminerals>.

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 to comply with Radware's Conflict Minerals Policy or Radware's other relevant policies for suppliers and contractors, such as our Supplier Code of Conduct, 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, and supports and recognizes relevant international frameworks and agreements, such as the United Nations' Declaration of Human Rights and the International Labor Organization's Declaration of Fundamental Principles. 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. To that end, the Company upholds a Code of Conduct for Suppliers that addresses issues associated with mineral sourcing and/or conflict minerals. By upholding standards for its suppliers, Radware expresses its commitment to using minerals in its products that do not directly or indirectly finance armed conflict in the DRC or one of the other Covered Countries, or that benefit, directly or indirectly, armed groups in those countries.

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## 1. Overview

### Company Overview

We are a provider of cyber security and application delivery solutions for physical, cloud, physical and software defined data centers (SDDC). Our solutions secure the digital experience by providing infrastructure, application, and corporate IT protection and availability services to enterprises globally. Our solutions are deployed by, among others, enterprises, carriers and cloud service providers. Our solutions are offered in two main categories: products and customer services. Our product offering includes a range of physical, software-based products, product subscriptions and cloud-based subscriptions (or a combination of these) for enterprise and carrier data centers, as part of their IT and application infrastructure. Our customer services offering includes technical support, professional services, managed services and training and certification to our customers. We sell through sales channels such as resellers and distributors whereas most of our direct sales are to strategic customers.

For more information about Radware, please visit [www.radware.com](http://www.radware.com). The content of any website referred to in this Report is included for general information only and is not incorporated by reference herein.

### Responsible Sourcing Efforts in Our Supply Chain

We conducted an analysis of our products and found that small quantities of 3TG could potentially be found in our products that were manufactured or contracted to be manufactured in 2021, and that the 3TG is or could be necessary to the functionality or production of our products.

The products that we manufacture are highly complex, typically containing thousands of parts that are sourced from direct suppliers. In general, as a downstream company (as further explained under Section 2.1 below), 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 so that they may provide us with accurate information regarding the origin, or likely origin, of 3TG in the components we purchase from them and that is necessary to the production or functionality of our products. 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 supplier contracts or renew existing supplier contracts, we seek to add, where feasible, a conflict minerals contract clause that requires relevant suppliers to provide us with information on the likely source and chain of custody of 3TG and relevant smelters or refiners. In attempting to determine the source of the 3TG content in our products, i.e., through our supply chain due diligence, we do not seek to eliminate sourcing from the DRC or other Covered Countries, but rather to ensure that our suppliers responsibly source the necessary minerals in a fashion that does not directly or indirectly fund or support the armed conflict ongoing in that region.

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

We have determined that requesting our direct suppliers to complete the standard Conflict Minerals Reporting Template (“CMRT”) 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, 2021, in aggregate, at least 90% of our spend on the manufacturing costs of our finished products that were shipped in 2021. We identified in total four (4) relevant suppliers (the “In-Scope Suppliers”). We collected all relevant data from our In-Scope Suppliers who were requested to submit CMRT of at least version 6.01 or higher published by the Responsible Minerals Initiatives’ (“RMI”) in order to monitor the due diligence process and to gather and assess information from all such In-Scope Suppliers in a standardized format that is approved by an independent third party audit body, such as the RMI or the London Bullion Market Association (“LBMA”).

We sent letters to our In-Scope Suppliers to explain the Rule and to refer them to online training materials and instructions.

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 four In-Scope Suppliers, all of the suppliers (100%) completed and returned to us a CMRT.

Based on these efforts, we have reason to believe that some of our products may contain necessary conflict minerals that potentially originated in the DRC or one of the Covered Countries and are not entirely 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 Co-operation and Development (“OECD”) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (2016)” and related Supplements (the “OECD Guidance”). The OECD Guidance distinguishes between the roles of, and the corresponding due diligence recommendations addressed to upstream companies and downstream companies in the supply chain, whereby “upstream” generally means the mineral supply chain from the mine to smelters or refineries, and “downstream” generally means the minerals supply chain from smelters/refiners to retailers. 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 refineries as we believe that we are a “downstream” company.

### **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 of the necessary conflict minerals. The Policy is publicly available on our website at <https://www.radware.com/corporategovernance/conflictminerals>.

**Internal Team**

We have established a management system to implement our responsible sourcing practices, to assist in the completion of the RCOI inquiry, and to further enable our supply chain due diligence related to the necessary 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 In-Scope Suppliers provide information to us regarding 3TG and relevant smelters or refiners using the CMRT of at least version 6.01 or higher. We collect and analyze all relevant data submitted to us through the CMRT to maintain a smelter or refiner database for Radware. This database of records is compared against the list of smelters or refiners that have received 'conformant' or 'active' designation according to the RMI's independent smelter or refiner audit program, namely the Responsible Minerals Assurance Process ("RMAP") or the LBMA.

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, namely from the DRC or other Covered Countries, as per the stipulations of the Rule.

**Grievance Mechanism**

Our Conflict Minerals Policy is available to the public on our website at <https://www.radware.com/corporategovernance/conflictminerals> 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 for the five-year duration recommended by the OECD Guidance. Radware 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. Our webpage is hosted at <https://www.radware.com/corporategovernance/conflictminerals>.

We also provide guidance on the topic for relevant suppliers and engage in on-going outreach to our suppliers in order to collect, validate and archive supplier responses that relate to our conflict minerals due diligence process and supply chain inquiry.



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

Our internal controls also include a company-wide Code of Conduct that outlines expected behaviors from all of our employees, contractors and consultants in engaging with suppliers. We have also adopted a Supplier Code of Conduct in which we convey to our suppliers, contractors and relevant third parties our expectations regarding, among other topics, responsible sourcing practices. The full text of our Code of Conduct and Supplier Code of Conduct is available on our website at <https://www.radware.com/corporategovernance>.

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

We approached four In-Scope Suppliers and received responses from all (100%) of the In-Scope Suppliers as described in the RCOI. We reviewed and analyzed the respective CMRTs of our In-Scope Suppliers and compared the information provided therein against the Standard Smelter List of Compliant and Active Smelters from the RMAP - a list issued by RMI that aims to identify smelters or refiners that have systems in place to assure the responsible sourcing of conflict minerals, including those conflict minerals originating from the DRC or other Covered Countries. We rely on these In-Scope Suppliers, whose components may contain 3TG, to provide us with information on the likely source and chain of custody of conflict minerals contained in the components supplied to us that are necessary to the production and/or to the functionality of our products. Our In-Scope 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 of our risk management strategy is not to eliminate sourcing from the DRC or other Covered Countries, but rather to encourage participation with the RMI and other relevant third party audit bodies, where possible. The following steps were taken to implement a strategy to help us assess potential risks:

- The CM Steering Committee held periodic meetings to review progress and assess the risks identified.
- We reviewed the responses that we received from In-Scope Suppliers and followed up on what we perceived to be inconsistent, incomplete, or inaccurate responses, as well as sent reminders to In-Scope Suppliers that did not respond to our requests for information.
- We sent, where applicable, follow up letters to unresponsive In-Scope Suppliers and to In-Scope Suppliers who declared they sourced conflict minerals from the DRC or other Covered Countries, asking them to complete their supply chain due diligence process in order to validate that all smelters or refiners from the DRC or other Covered Countries are compliant with the RMI or other independent conflict-free smelter validation programs, such as the London Bullion Market (LBMA) or the Responsible Jewelry Council (RJC).
- Engaged relevant senior management, including our Vice President and General Counsel, who were briefed on our due diligence efforts, risk analysis results and mitigation efforts.
- We approached In-Scope Suppliers that we identified as possibly sourcing from smelters or refiners located in the DRC or other Covered Countries that did not receive a conformant or active designation from the RMI or LBMA, 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 <https://www.radware.com/corporategovernance/conflictminerals> and is filed with the SEC.

## 3. Results of Assessment

Based on information provided by our In-Scope 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 In-Scope Suppliers.
- Out of the four (4) In-Scope Suppliers, all (100%) completed and returned the CMRTs to us. Based on the CMRTs we received from these In-Scope Suppliers:
  - o 100% of the responses received provided data at the following levels.

<u>Category of RMI CMRT Filed</u>	<u>Percentage of Responsive In-Scope Suppliers</u>
Company level	50% (2 out of 4 suppliers)
User defined	25% (1 out of 4 suppliers)
Product list	25% (1 out of 4 suppliers)

- o We identified that **91%** of the 298 reported smelters or refiners (“SoRs”), as of the publication of this Report, are conformant or active in the RMI’s RMAP audit program, as detailed below:

### SoR RMI Status (Conformant, Active and Undocumented):

<b>Conformant</b>	271 Smelters or Refiners, 91% of Smelters or Refiners
<b>Active</b>	20 Smelters or Refiners, 7% of Smelter or Refiners
<b>Undocumented</b>	7 Smelters or Refiners, 2% of Smelters or Refiners
<b>Total</b>	298 Smelters or Refiners, 100% of Smelters or Refiners

Based on the information provided by the In-Scope 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 or refiners listed in [Annex I](#) below.

Based on the information provided by the In-Scope 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 [Annex II](#) below.

The information gathered from our In-Scope 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 is provided from direct suppliers as well as from independent third party audit programs such as the RMI and the LBMA.

#### **4. Future Risk Mitigation Efforts**

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

- Continue implementing risk management measures and follow up processes with regard to non-responsive suppliers or suppliers working with undocumented suppliers according to current information from the RMI's RMAP program.
- As described in our Conflict Minerals Policy, to the extent that we have reason to believe that any of our 3TG suppliers source, or potentially source, such minerals from facilities that may, directly or indirectly, support the on-going conflict in the DRC or the other Covered Countries, we encourage such suppliers to establish an alternative source of 3TG sourcing that does not support such conflict, as outlined in the OECD Guidance. This engagement is important to us as we are committed to discouraging the propagation of human rights abuses in our supply chain.
- 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 with the goal of maintaining a 100% response rate and improving the content of the supplier's survey responses.
- Request suppliers to procure materials through validated smelters or refiners pursuant to the RMI or other approved resources and request suppliers to take mitigating actions in case they do not.
- Continue to validate supplier responses using information collected via independent conflict-free smelter or refiner 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 and/or Refiners

<b>Metal (*)</b>	<b>Smelter Name Look-up</b>	<b>Smelter Country (*)</b>
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 Brazil	BRAZIL
Gold	Argor-Heraeus S.A.	SWITZERLAND
Gold	Amagasaki Factory, Hyogo Prefecture, Japan	JAPAN
Gold	Asaka Riken Co., Ltd.	JAPAN
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	CCR	CANADA
Gold	Cendres + M?taux SA	SWITZERLAND
Gold	Chimet S.p.A.	ITALY
Gold	Chugai Mining	JAPAN
Gold	Daye Non-Ferrous Metals Mining Ltd.	CHINA
Gold	Do Sung Corporation	KOREA, REPUBLIC OF
Gold	Doduco	GERMANY
Gold	AKITA Seiren	JAPAN
Gold	Eco-System Recycling Co., Ltd. East Plant	JAPAN
Gold	GCC Gujrat Gold Centre Pvt. Ltd.	INDIA
Gold	FSE Novosibirsk Refinery	RUSSIAN FEDERATION

Gold	HeeSung Metal Ltd.	KOREA, REPUBLIC OF
Gold	Heimerle + Meule GmbH	GERMANY
Gold	Heraeus Ltd. Hong Kong	CHINA
Gold	Heraeus Germany GmbH Co. KG	GERMANY
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	JCC	CHINA
Gold	Asahi Refining USA Inc.	UNITED STATES OF AMERICA
Gold	Asahi Refining Canada Ltd.	CANADA
Gold	JSC Urals Electromet	RUSSIAN FEDERATION
Gold	JX Nippon Mining & Metals Co., Ltd.	JAPAN
Gold	Kazzinc	KAZAKHSTAN
Gold	Kennecott Utah Copper LLC	UNITED STATES OF AMERICA
Gold	Kojima Chemicals Co., Ltd.	JAPAN
Gold	LS-NIKKO Copper Inc.	KOREA, REPUBLIC OF
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 Switzerland	SWITZERLAND
Gold	Metalor USA Refining Corporation	UNITED STATES OF AMERICA
Gold	Metalurgica Met-Mex Peñoles, S.A. de C.V	MEXICO

Gold	Mitsubishi Materials Corporation	JAPAN
Gold	Mitsui Kinzoku Co., Ltd.	JAPAN
Gold	Federal State Unitary Enterprise Moscow Special Processing Plant (FSUE MZSS)	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	C.I Metales Procesados Industriales SAS	COLOMBIA
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	Prioksky Plant of Non-Ferrous Metals	RUSSIAN FEDERATION
Gold	PT Aneka Tambang (Persero) Tbk	INDONESIA
Gold	Augmont Enterprises Private Limited	INDIA
Gold	Alexy Metals	UNITED STATES OF AMERICA
Gold	PX Precinox S.A.	SWITZERLAND
Gold	Rand Refinery (Pty) Ltd.	SOUTH AFRICA
Gold	Royal Canadian Mint	CANADA
Gold	Samdok Metal	KOREA, REPUBLIC OF
Gold	SEMPSA Joyeria Plateria S.A.	SPAIN
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CHINA
Gold	Sichuan Tianze Precious Metals Co., Ltd.	CHINA
Gold	Shyolkovsky	RUSSIAN FEDERATION
Gold	Solar Applied Materials Technology Corp.	TAIWAN, PROVINCE OF CHINA
Gold	MEM(Sumitomo Group)	JAPAN
Gold	Shonan Plant Tanaka Kikinzoku	JAPAN

Gold	Great Wall Precious Metals Co., LTD.	CHINA
Gold	China's Shandong Gold Mining Co., Ltd	CHINA
Gold	Tokuriki Honten Co., Ltd.	JAPAN
Gold	Torecom	KOREA, REPUBLIC OF
Gold	Metallurgie Hoboken Overpelt	BELGIUM
Gold	United Precious Metal Refining, Inc.	UNITED STATES OF AMERICA
Gold	Valcambi S.A.	SWITZERLAND
Gold	AGR (Perth Mint Australia)	AUSTRALIA
Gold	Yamakin Co., Ltd.	JAPAN
Gold	Yokohama Metal Co., Ltd.	JAPAN
Gold	Sancus ZFS (L'Orfebvre, SA)	COLOMBIA
Gold	China Henan Zhongyuan Gold Smelter	CHINA
Gold	Fujian Zijin mining stock company gold smelter	CHINA
Gold	SAFINA A.S.	CZECHIA
Gold	Umicore Precious Metals Thailand	THAILAND
Gold	Geib Refining Corporation	UNITED STATES OF AMERICA
Gold	MMTC-PAMP India Pvt., Ltd.	INDIA
Gold	KGHM Polska Miedz S.A.	POLAND
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	T.C.A S.p.A	ITALY
Gold	Remondis Argentia B.V.	NETHERLANDS
Gold	Korea Zinc Co., Ltd.	KOREA, REPUBLIC OF
Gold	Marsam Metals	BRAZIL

Gold	TOO Tau-Ken-Altyn	KAZAKHSTAN
Gold	SAAMP	FRANCE
Gold	L'Orfebvre S.A.	ANDORRA
Gold	8853 S.p.A.	ITALY
Gold	Italpreziosi	ITALY
Gold	SAXONIA Edelmetalle GmbH	GERMANY
Gold	WIELAND Edelmetalle GmbH	GERMANY
Gold	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	AUSTRIA
Gold	BALORE REFINERSGA	INDIA
Gold	SungEel HiMetal Co., Ltd.	KOREA, REPUBLIC OF
Gold	Planta Recuperadora de Metales SpA	CHILE
Gold	Safimet S.p.A	ITALY
Gold	NH Recytech Company	KOREA, REPUBLIC OF
Gold	Eco-System Recycling Co., Ltd. North Plant	JAPAN
Gold	Eco-System Recycling Co., Ltd. West Plant	JAPAN
Gold	Metal Concentrators SA (Pty) Ltd.	SOUTH AFRICA
Gold	Refinery of Seemine Gold Co., Ltd.	CHINA
Gold	Kyrgyzaltyn JSC	KYRGYZSTAN
Gold	AU Traders and Refiners	SOUTH AFRICA
Gold	DS PRETECH Co., Ltd.	KOREA, REPUBLIC OF
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	CHINA
Tantalum	Exotech Inc.	UNITED STATES OF AMERICA
Tantalum	F & X	CHINA
Tantalum	Guangdong Zhiyuan New Material Co., Ltd.	CHINA
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINA



Tantalum	Jiujiang Nonferrous Metals Smelting Company Limited	CHINA
Tantalum	LSM Brasil S.A.	BRAZIL
Tantalum	Metallurgical Products India Pvt. Ltd. (MPIL)	INDIA
Tantalum	Mineracao Taboca S.A.	BRAZIL
Tantalum	Mitsui Mining & Smelting	JAPAN
Tantalum	Molycorp Silmet A.S.	ESTONIA
Tantalum	Ningxia Non-Ferrous Metal Smeltery	CHINA
Tantalum	QuantumClean	UNITED STATES OF AMERICA
Tantalum	RFH	CHINA
Tantalum	Solikamsk	RUSSIAN FEDERATION
Tantalum	Taki Chemical Co., Ltd.	JAPAN
Tantalum	Telex Metals	UNITED STATES OF AMERICA
Tantalum	ULBA	KAZAKHSTAN
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA
Tantalum	D Block Metals, LLC	UNITED STATES OF AMERICA
Tantalum	FIR Metals & Resource Ltd.	CHINA
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	CHINA
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHINA
Tantalum	KEMET Blue Metals	MEXICO
Tantalum	H.C. Starck Co., Ltd.	THAILAND
Tantalum	H.C. Starck Tantalum and Niobium GmbH	GERMANY
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	Global Advanced Metals Boyertown	UNITED STATES OF AMERICA
Tantalum	Global Advanced Metals Aizu	JAPAN
Tantalum	Resind Ind e Com Ltda.	BRAZIL
Tantalum	Jiangxi Tuohong New Raw Material	CHINA
Tantalum	Asaka Riken Co., Ltd.	JAPAN
Tantalum	PRG Dooel	NORTH MACEDONIA
Tin	Chenzhou Yun Xiang mining limited liability company	CHINA
Tin	Alent plc	UNITED STATES OF AMERICA
Tin	Dowa	JAPAN
Tin	EM Vinto	BOLIVIA (PLURINATIONAL STATE OF)
Tin	Fenix Metals	POLAND
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA
Tin	Gejiu Zi-Li	CHINA
Tin	Gejiu Kai Meng Industry and Trade LLC	CHINA
Tin	China Tin (Hechi)	CHINA
Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA
Tin	Metallic Resources, Inc.	UNITED STATES OF AMERICA
Tin	Mineracao Taboca S.A.	BRAZIL
Tin	Funsur Smelter	PERU
Tin	Mitsubishi Materials Corporation	JAPAN
Tin	Jiangxi Nanshan	CHINA
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND
Tin	OMSA	BOLIVIA (PLURINATIONAL STATE OF)
Tin	PT Artha Cipta Langgeng	INDONESIA

Tin	Smelter not listed	INDONESIA
Tin	PT Babel Surya Alam Lestari	INDONESIA
Tin	PT Mitra Stania Prima	INDONESIA
Tin	PT Prima Timah Utama	INDONESIA
Tin	Brand RBT	INDONESIA
Tin	Smelter not listed	INDONESIA
Tin	PT Stanindo Inti Perkasa	INDONESIA
Tin	Kundur Smelter	INDONESIA
Tin	INDONESIAN STATE TIN CORPORATION MENTOK SMELTER	INDONESIA
Tin	PT Tinindo Inter Nusa	INDONESIA
Tin	Rui Da Hung	TAIWAN, PROVINCE OF CHINA
Tin	Soft Metais Ltda.	BRAZIL
Tin	Thai Solder Industry Corp., Ltd.	THAILAND
Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	CHINA
Tin	White Solder Metalurgia e Mineracao Ltda.	BRAZIL
Tin	Chengfeng Metals Co Pte Ltd	CHINA
Tin	Estanho de Rondonia S.A.	BRAZIL
Tin	Magnu's Minerais Metais e Ligas Ltda.	BRAZIL
Tin	Melt Metais e Ligas S.A.	BRAZIL
Tin	PT ATD Makmur Mandiri Jaya	INDONESIA
Tin	O.M. Manufacturing Philippines, Inc.	PHILIPPINES
Tin	Smelter not listed	INDONESIA
Tin	Resind Ind e Com Ltda.	BRAZIL
Tin	Novosibirsk Processing Plant Ltd.	RUSSIAN FEDERATION
Tin	Metallo Belgium N.V.	BELGIUM

Tin	Metallo Spain S.L.U.	SPAIN
Tin	Smelter not listed	INDONESIA
Tin	Thai Nguyen Mining and Metallurgy Co., Ltd.	VIET NAM
Tin	PT Menara Cipta Mulia	INDONESIA
Tin	HuiChang Hill Tin Industry Co., Ltd.	CHINA
Tin	PT Timah Nusantara	INDONESIA
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CHINA
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CHINA
Tin	PT Bangka Serumpun	INDONESIA
Tin	Tin Technology & Refining	UNITED STATES OF AMERICA
Tin	Ma'anshan Weitai Tin Co., Ltd.	CHINA
Tin	China Yunnan Tin Co Ltd.	CHINA
Tin	PT Rajawali Rimba Perkasa	INDONESIA
Tin	Luna Smelter, Ltd.	RWANDA
Tin	Yunnan Yunfan Non-ferrous Metals Co., Ltd.	CHINA
Tin	CV Venus Inti Perkasa	INDONESIA
Tin	Super Ligas	BRAZIL
Tin	Smelter not listed	INDONESIA
Tin	Smelter not listed	INDONESIA
Tin	PT Mitra Sukses Globalindo	INDONESIA
Tin	CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda	BRAZIL
Tin	CRM Synergies	SPAIN
Tin	Smelter Not Listed	INDONESIA
Tungsten	A.L.M.T. Corp.	JAPAN
Tungsten	ATI Metalworking Products	UNITED STATES OF AMERICA

Tungsten	Chaozhou Xianglu Tungsten Industry Co., Ltd.	CHINA
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA
Tungsten	Global Tungsten & Powders Corp.	UNITED STATES OF AMERICA
Tungsten	Hunan Chenzhou Mining Co., Ltd.	CHINA
Tungsten	Human Chun-Chang non-ferrous Smelting & Concentrating Co., Ltd.	CHINA
Tungsten	Japan New Metals Co., Ltd.	JAPAN
Tungsten	China National Non Ferrous	CHINA
Tungsten	Kennametal Fallon	UNITED STATES OF AMERICA
Tungsten	WBH	AUSTRIA
Tungsten	Xiamen Tungsten Co., Ltd.	CHINA
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHINA
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CHINA
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CHINA
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHINA
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CHINA
Tungsten	Xiamen H.C.	CHINA
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CHINA
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA
Tungsten	Asia Tungsten Products Vietnam Ltd.	VIET NAM
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.	CHINA
Tungsten	H.C. Starck Tungsten GmbH	GERMANY
Tungsten	H.C. Starck Smelting GmbH & Co. KG	GERMANY
Tungsten	Masan High-Tech Materials	VIET NAM
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA
Tungsten	Niagara Refining LLC	UNITED STATES OF AMERICA

Tungsten	China Molybdenum Co., Ltd.	CHINA
Tungsten	Ganzhou Haichuang Tungsten Co., Ltd.	CHINA
Tungsten	Hydrometallurg, JSC	RUSSIAN FEDERATION
Tungsten	Unecha Refractory metals plant	RUSSIAN FEDERATION
Tungsten	Philippine Chuangxin Industrial Co., Inc.	PHILIPPINES
Tungsten	Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.	CHINA
Tungsten	ACL Metais Eireli	BRAZIL
Tungsten	Moliren Ltd.	RUSSIAN FEDERATION
Tungsten	KGETS Co., Ltd.	KOREA, REPUBLIC OF
Tungsten	Fujian Ganmin RareMetal Co., Ltd.	CHINA
Tungsten	Lianyou Metals Co., Ltd.	TAIWAN, PROVINCE OF CHINA
Tungsten	JSC "Kirovgrad Hard Alloys Plant"	RUSSIAN FEDERATION
Tungsten	Cronimet Brasil Ltda	BRAZIL
Tungsten	NPP Tyazhmetprom LLC	RUSSIAN FEDERATION
Tungsten	GEM Co., Ltd.	CHINA
Tungsten	Albasteel Industria e Comercio de Ligas Para Fundicao Ltd.	BRAZIL
Tungsten	Woltech Korea Co., Ltd.	KOREA, REPUBLIC OF
Tungsten	Hunan Litian Tungsten Industry Co., Ltd.	CHINA
Tungsten	Fujian Jinxin Tungsten Co., Ltd.	CHINA
Tungsten	Tejing (Vietnam) Tungsten Co., Ltd.	VIET NAM
Tungsten	Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji	CHINA

**Annex II – Country of Origin Inquiry (COO)**

<b>Gold</b>	<b>Tantalum</b>	<b>Tin</b>	<b>Tungsten</b>
UNITED STATES OF AMERICA	CHINA	CHINA	JAPAN
JAPAN	UNITED STATES OF AMERICA	UNITED STATES OF AMERICA	UNITED STATES OF AMERICA
GERMANY	BRAZIL	JAPAN	CHINA
UZBEKISTAN	INDIA	BOLIVIA (PLURINATIONAL STATE OF)	AUSTRIA
BRAZIL	JAPAN	BRAZIL	VIET NAM
SWITZERLAND	ESTONIA	POLAND	GERMANY
PHILIPPINES	RUSSIAN FEDERATION	MALAYSIA	RUSSIAN FEDERATION
SWEDEN	KAZAKHSTAN	PERU	PHILIPPINES
CANADA	MEXICO	RUSSIAN FEDERATION	BRAZIL
ITALY	THAILAND	THAILAND	KOREA, REPUBLIC OF
CHINA	GERMANY	INDONESIA	TAIWAN, PROVINCE OF CHINA
KOREA, REPUBLIC OF	NORTH MACEDONIA	TAIWAN, PROVINCE OF CHINA	
RUSSIAN FEDERATION		PHILIPPINES	
TURKEY		BELGIUM	
KAZAKHSTAN		SPAIN	
SINGAPORE		VIET NAM	
MEXICO		RWANDA	
INDONESIA			
SOUTH AFRICA			
SPAIN			
TAIWAN, PROVINCE OF CHINA			
BELGIUM			
AUSTRALIA			
CZECHIA			
THAILAND			
INDIA			
POLAND			
UNITED ARAB EMIRATES			
NETHERLANDS			
FRANCE			
ANDORRA			
AUSTRIA			
CHILE			
COLOMBIA			
KYRGYZSTAN			