

# TEXTRON INC.

## Conflict Minerals Report

For the Year Ended December 31, 2017

### **Introduction**

Textron Inc. is providing this report for the year ended December 31, 2017 to comply with Rule 13p-1 under the Securities Exchange Act of 1934 (the “Rule”). The Rule imposes certain reporting obligations on SEC registrants that manufacture or contract to manufacture products containing conflict minerals that are necessary to the functionality or production of those products. The term “conflict mineral” means columbite-tantalite, also known as coltan, cassiterite, gold and wolframite, or their derivatives, which are limited to tantalum, tin and tungsten (collectively, “3TGs”).

On March 6, 2017, Textron acquired Arctic Cat Inc. (“Arctic Cat”), a publicly-held company which previously filed its own Form SD. This Conflict Minerals Report includes information related to Arctic Cat as though it were a Textron company for the entire 2017 calendar year.

### **Company and Product Overview**

Textron is a \$14.2 billion multi-industry company operating in numerous countries around the world. Our businesses manufacture a variety of complex products including business jets, turboprop and piston aircraft, helicopters and tiltrotor aircraft, unmanned aircraft systems, armored vehicles, advanced marine craft, intelligence software solutions, piston engines, simulation, training and other defense and aviation mission support products, fuel systems and functional components, specialized vehicles such as golf cars, recreational and utility vehicles, aviation ground support equipment, professional mowers, and tools and test equipment. References to “Textron”, “we” and “our” in this Report refer to Textron Inc. and its consolidated subsidiaries.

### **Covered Products**

We conducted a review of the products that we manufacture or contract to be manufactured and found that our products contain 3TGs within numerous components, such as jet engines, circuit boards, electronics, brake components and wiring, and 3TGs generally are required for the products’ functionality or production as specified under the Rule.

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

We conducted a Reasonable Country of Origin Inquiry (“RCOI”) to seek to ascertain whether the 3TGs in our products originated from the Democratic Republic of the Congo or an adjoining country (known collectively as the “Covered Countries”), or are from recycled or scrap sources.

Because of our size, the complexity of our products, and the depth, breadth, and constant evolution of our worldwide supply chain, it is difficult to identify suppliers in our supply chain which are multiple steps removed from our direct (first-tier) suppliers, and we have no direct relationships with mines, smelters or refiners of 3TGs. Accordingly, we rely on our direct suppliers to provide information on the origin of the 3TGs contained in components and materials supplied to us by them – including sources of 3TGs that are supplied to them from lower tier suppliers.

To implement our RCOI, we established enterprise-wide conflict minerals procedures directing each business unit to take a number of steps to identify suppliers (“in-scope suppliers”) of components or materials potentially containing 3TGs included in products we manufactured or contracted to manufacture during 2017.

Our third-party consultant conducted a supply chain survey with the in-scope suppliers using the Responsible Business Alliance and Global e-Sustainability Initiative Conflict Minerals Reporting Template (“CMRT”), version 5.10 or higher. As part of the supplier survey, in-scope suppliers were contacted via a software platform that enables users to complete and track supplier communications and allows suppliers to upload completed CMRT forms directly to the platform for assessment and management. Communications sent to in-scope suppliers

through the platform included training and education on the completion of the CMRT form. The survey process and education materials were again enhanced for the 2017 reporting year.

Non-responsive in-scope suppliers were contacted a number of times through the platform and then were also contacted by the consultant's team in one on one communications. Certain suppliers who continued to be non-responsive were also contacted by a representative of the applicable Textron business unit. The initial group of 2508 suppliers considered to be in-scope was narrowed to 2402 suppliers, due to responses which enabled us to determine that 106 suppliers were in fact not in-scope for the 2017 reporting year for various reasons. These reasons include, for example, being an inactive supplier for that year or providing components or materials which were not included in a final product.

Our program for 2017 continues to include automated data validation on all submitted CMRTs. The goal of data validation is to increase the accuracy of submissions and identify any contradictory answers in the CMRT. The survey responses were reviewed for completeness and consistency and our consultant followed up with suppliers who provided incomplete or inconsistent responses. Ultimately, we received complete and validated responses to our supply chain survey from approximately 71% of the in-scope suppliers.

Although approximately 71% of Textron's in-scope suppliers responded to the RCOI, there are many suppliers that have not yet provided any smelter or refiner information or have provided incomplete smelter or refiner data. For the suppliers that responded and provided smelter or refiner data, the consultant reviewed all supplier responses that claimed in the declaration section of the CMRT to have known DRC-sourced material.

Because the results of our RCOI indicated that some of our products contain 3TGs which may have originated from the Covered Countries, in an effort to locate mines with the greatest possible specificity, we performed due diligence measures on the source and chain of custody of the 3TGs as described below.

## **Due Diligence**

### *Design of Our Due Diligence Framework*

Our due diligence measures have been designed to conform, in all material respects, with the framework in 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 and the related Supplements for gold and for tin, tantalum and tungsten (OECD Guidance).

### *Due Diligence Process*

In conformity with the OECD's five step process, we conducted the following activities during the 2017 reporting period:

#### Step 1. Company Management Systems

We have established a management system to support supply chain due diligence related to 3TGs which includes maintaining an internal conflict minerals team with representatives from each of our business units as well as subject matter experts from various internal functions, including legal and environmental health and safety. The team follows our documented procedures for our conflict minerals compliance program. These procedures cover the identification of suppliers to be surveyed and escalation procedures, as described above, records retention, updating supplier lists and integrating acquired businesses into the program. The team leaders report to Textron's Procurement Council and senior management on the status of our program as appropriate.

In addition, the team has agreed upon a recommended conflict minerals contractual provision which our businesses seek to include in any new or amended contracts with suppliers that may be relevant for our conflict minerals compliance program. This contractual provision requires suppliers to provide us with the necessary 3TG information and to adopt a supply chain policy and procedure to conduct, and require its suppliers to conduct, a reasonable country of origin inquiry and, if necessary, to perform due diligence to identify the facilities used to

process the 3TGs and make efforts to identify the location of each mine or location of origin of the 3TGs with the greatest possible specificity.

Textron has adopted a Conflict Minerals Policy Statement which can be found at <http://investor.textron.com/investors/corporate-governance/default.aspx>.

To improve supplier education and training, we utilized our third-party consultant's learning management system and, through our consultant, provided all in-scope suppliers access to their Conflict Minerals training course. This training is tracked and evaluated based on completion. All suppliers are encouraged to complete all modules within this course.

In addition, we maintain an enterprise-wide grievance mechanism, including an employee helpline, as described in our Business Conduct Guidelines, that enables employees to report suspected or known violations of our Business Conduct Guidelines, law or company policy.

#### Step 2. Identification and Assessment of Supply Chain Risks

We have worked to identify and assess our supply chain risk through the CMRT survey process. There are a variety of risks identified throughout the survey process, including the risk presented by the lack of sourcing information due to non-responsive suppliers and suppliers providing incomplete or inconsistent responses. The smelter and refiner data collected through the CMRT highlights actual sourcing risk, such as a smelter or refiner sourcing from the Covered Countries and not yet certified as conflict free, or of even higher risk, a smelter or refiner which has not yet begun the audit process to receive certification.

#### Step 3. Strategy to Respond to Identified Risks

While many risks exist in the search for the origin of the conflict minerals used in components and materials supplied to Textron, as noted above, one of our identified risks is the inability to obtain complete and accurate information from our suppliers in order to make determinations about our products. There are numerous initiatives working to improve transparency and accountability at the smelter and refinery levels of the supply chain, however, we can only benefit from the information being developed by these initiatives if our suppliers are able to trace back the conflict minerals in their products to a specific smelter or refiner.

In our new or amended contractual agreements with our direct suppliers, we have requested the inclusion of a contractual provision which requires suppliers to provide us with the necessary 3TG information and to adopt a supply chain policy and procedure to conduct, and require its suppliers to conduct, a reasonable country of origin inquiry and, if necessary, to perform due diligence to identify the facilities used to process the 3TGs and make efforts to identify the location of each mine or location of origin of the 3TGs with the greatest possible specificity. This objective also is reflected in our Conflict Minerals Policy Statement, which indicates that we encourage our suppliers to undertake reasonable due diligence with their supply chains in an effort to assure their conflict minerals are being sourced from mines and smelters/refiners which have been certified by an independent third party as "conflict free" if sourced within the Covered Countries. Our Policy Statement further states that "if we determine that any of our products or components contain 3TG from a mine or facility in a Covered Country that is not "conflict free", we will evaluate our options, including but not limited to reassessment of the supplier relationship."

As our program matures and we obtain more detailed information from our suppliers with regard to the origin of the 3TGs contained in components and materials supplied to us by them, we will evaluate how to respond to identified risks in our supply chain, including, if appropriate, escalating identified risks to management for consideration of further action. During 2017, we did not identify any instances where it was necessary to escalate identified risks to management for further action.

#### Step 4. Independent Third Party Audit of Facilities' Due Diligence Practices

As discussed above, we do not have direct relationships with smelters or refiners, and we do not perform direct audits of these entities' supply chains. We intend to rely on the development and implementation of independent third party audits of smelters' and refiners' sourcing, such as the Responsible Minerals Assurance Process..

## Step 5. Report on Supply Chain Due Diligence

This Report is submitted to the SEC annually and is publicly available at <http://investor.textron.com/investors/corporate-governance/default.aspx>.

### **Due Diligence Results**

Many of the responses received from suppliers which indicated that they source 3TGs from a Covered Country provided data at the company or divisional level, rather than at the part or component level. As a result, we have been unable to determine whether the 3TGs reported by these suppliers were contained in components supplied to us (as opposed to other components supplied by our suppliers but not purchased by us). We are therefore unable to directly link, based on the due diligence measures described in this Report, 3TGs contained in Textron products to 3TGs originating from a Covered Country.

#### *Facilities Used to Process the 3TGs*

Certain of the supplier responses in the CMRT included the names of facilities listed as smelters or refiners. We do not typically have a direct relationship with 3TG smelters and refiners and do not perform or direct audits of these entities within our supply chain. Our consultant compared the facilities listed in the responses in the CMRT to the list of smelters maintained by the Responsible Minerals Initiative (“RMI”) and confirmed that the name was listed by RMI. As of May 22, 2018, we have validated in this manner that 320 smelters or refiners provided in our supplier CMRTs are included on these lists.

If a supplier indicated that a facility was certified as “Conflict-Free” our consultant confirmed that it was listed as such by RMI. Of the smelters and refiners listed by suppliers via the CMRTs which have been validated as described, 257 have been confirmed as “Conflict-Free” and 11 have begun the process to be validated as Conflict-Free. The CMRTs in the aggregate claim that 20 of the Conflict-Free smelters source 3TGs from the Covered Countries, however we cannot confirm this information. Many of the CMRTs did not provide information regarding the country of origin of 3TGs, and such information is generally not available through public information sources related to the smelters and refiners.

Despite the additional smelter information obtained from these suppliers, in most cases information has been provided on the company or divisional level, rather than on the part or component level. Therefore, we cannot yet ascertain whether the smelters identified by our suppliers are related to any parts or components actually provided to us by the suppliers. Schedule A lists the smelters and refiners that the suppliers we surveyed reported as being in their supply chains, along with the facility location, and an aggregate country list of known smelter or refiner sourcing countries. We have not included in Schedule A any smelters or refiners that we have not been able to validate.

Many suppliers are still unable to provide the smelters or refiners used for components supplied by them to us and, even where facilities were identified, the suppliers did not always provide complete information on the facility, including smelter identification numbers, so that we were unable to immediately validate the smelter as described above and, as previously noted, many of the responses indicated an “unknown” status in terms of determining the origin of 3TGs.

#### *Efforts to Determine Mine or Location of Origin*

For the reasons explained above, we rely on our direct suppliers to provide information on the origin of the 3TGs contained in components and materials they supply to us. As noted above, our program has initially focused on gathering smelter and refiner information via the CMRT survey process and, as the program progresses, we intend to work toward obtaining from our suppliers all necessary smelter and refiner identification information. This information will facilitate the validation and disclosure of the smelters and refiners as well as the tracing of the 3TGs to their location of origin. However, to date we only have smelter and facility information and no information with regard to the mine or specific location of origin of the 3TGs in our products or whether they come from recycled or scrap sources, as we understand that generally that information is kept confidential by the refiners and smelters.

We believe that the inquiries and investigations described above represent a reasonable effort to determine the mines or locations of origin of the 3TGs in our Covered Products, including seeking information about 3TG smelters and refiners in our supply chain through requesting that our suppliers complete the CMRT and verifying those smelters and refiners with the expanding RMI lists to the extent possible.

### **Steps to be Taken to Mitigate Risk**

We intend to take and continue the following actions to mitigate the risk that our necessary 3TGs benefit armed groups:

- Direct each of our business units to request our recommended contractual provision requiring our suppliers to conduct due diligence on their supply chains and to provide information to us about the source of their 3TGs, as described above. This provision is intended to be included in new and renewed supplier contracts on a going forward basis.
- Establish a screening process for new suppliers to our businesses so that new suppliers will be added to our in-scope supplier list if appropriate as they begin a relationship with the business.
- Direct suppliers to training resources to attempt to increase the response rate and improve the content of the supplier survey responses.
- Work toward obtaining from our suppliers additional smelter and refiner identification information.

Schedule A

Smelter and Refiner List

<b>Metal</b>	<b>Standard Smelter Name</b>	<b>Smelter Facility Location</b>	<b>Smelter ID</b>
Gold	Abington Reldan Metals, LLC	UNITED STATES	CID0027 08
Gold	Advanced Chemical Company	UNITED STATES	CID0000 15
Gold	African Gold Refinery	UGANDA	CID0031 85
Gold	Aida Chemical Industries Co., Ltd.	JAPAN	CID0000 19
Gold	Al Etihad Gold LLC	UNITED ARAB EMIRATES	CID0025 60
Gold	Allgemeine Gold-und Silberscheideanstalt A.G.	GERMANY	CID0000 35
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN	CID0000 41
Gold	AngloGold Ashanti Córrego do Sítio Mineração	BRAZIL	CID0000 58
Gold	Argor-Heraeus S.A.	SWITZERLAND	CID0000 77
Gold	Asahi Pretec Corp.	JAPAN	CID0000 82
Gold	Asahi Refining Canada Ltd.	CANADA	CID0009 24
Gold	Asahi Refining USA Inc.	UNITED STATES	CID0009 20
Gold	Asaka Riken Co., Ltd.	JAPAN	CID0000 90
Gold	Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	TURKEY	CID0001 03
Gold	AU Traders and Refiners	SOUTH AFRICA	CID0028 50
Gold	Aurubis AG	GERMANY	CID0001 13
Gold	Bangalore Refinery	INDIA	CID0028 63
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES	CID0001 28
Gold	Boliden AB	SWEDEN	CID0001 57

Gold	C. Hafner GmbH + Co. KG	GERMANY	CID0001 76
Gold	Caridad	MEXICO	CID0001 80
Gold	CCR Refinery - Glencore Canada Corporation	CANADA	CID0001 85
Gold	Cendres + Métaux S.A.	SWITZERLAND	CID0001 89
Gold	Chimet S.p.A.	ITALY	CID0002 33
Gold	Chugai Mining	JAPAN	CID0002 64
Gold	Daejin Indus Co., Ltd.	KOREA, REPUBLIC OF	CID0003 28
Gold	Daye Non-Ferrous Metals Mining Ltd.	CHINA	CID0003 43
Gold	Degussa Sonne / Mond Goldhandel GmbH	GERMANY	CID0028 67
Gold	DODUCO Contacts and Refining GmbH	GERMANY	CID0003 62
Gold	Dowa	JAPAN	CID0004 01
Gold	DS PRETECH Co., Ltd.	KOREA, REPUBLIC OF	CID0031 95
Gold	DSC (Do Sung Corporation)	KOREA, REPUBLIC OF	CID0003 59
Gold	Eco-System Recycling Co., Ltd.	JAPAN	CID0004 25
Gold	Elemetal Refining, LLC	UNITED STATES	CID0013 22
Gold	Emirates Gold DMCC	UNITED ARAB EMIRATES	CID0025 61
Gold	Fidelity Printers and Refiners Ltd.	ZIMBABWE	CID0025 15
Gold	GCC Gujrat Gold Centre Pvt. Ltd.	INDIA	CID0028 52
Gold	Geib Refining Corporation	UNITED STATES	CID0024 59
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CHINA	CID0022 43
Gold	Great Wall Precious Metals Co., Ltd. of CBPM	CHINA	CID0019 09
Gold	Guangdong Jinding Gold Limited	CHINA	CID0023 12
Gold	Guoda Safina High-Tech Environmental Refinery Co., Ltd.	CHINA	CID0006 51

Gold	Hangzhou Fuchunjiang Smelting Co., Ltd.	CHINA	CID0006 71
Gold	HeeSung	KOREA, REPUBLIC OF	CID0006 89
Gold	Heimerle + Meule GmbH	GERMANY	CID0006 94
Gold	Heraeus Metals Hong Kong Ltd.	CHINA	CID0007 07
Gold	Heraeus Precious Metals GmbH & Co. KG	GERMANY	CID0007 11
Gold	Hunan Chenzhou Mining Co., Ltd.	CHINA	CID0007 67
Gold	Hwasung CJ Co., Ltd.	KOREA, REPUBLIC OF	CID0007 78
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CHINA	CID0008 01
Gold	Ishifuku Metal Industry Co., Ltd.	JAPAN	CID0008 07
Gold	Istanbul Gold Refinery	TURKEY	CID0008 14
Gold	Italpreziosi	ITALY	CID0027 65
Gold	Japan Mint	JAPAN	CID0008 23
Gold	Jiangxi Copper Co., Ltd.	CHINA	CID0008 55
Gold	JSC Ekaterinburg Non-Ferrous Metal Processing Plant	RUSSIAN FEDERATION	CID0009 27
Gold	JSC Uralelectromed	RUSSIAN FEDERATION	CID0009 29
Gold	JX Nippon Mining & Metals Co., Ltd.	JAPAN	CID0009 37
Gold	Kaloti Precious Metals	UNITED ARAB EMIRATES	CID0025 63
Gold	Kazakhmys Smelting LLC	KAZAKHSTAN	CID0009 56
Gold	Kazzinc	KAZAKHSTAN	CID0009 57
Gold	Kennecott Utah Copper LLC	UNITED STATES	CID0009 69
Gold	KGHM Polska Miedz Spolka Akcyjna	POLAND	CID0025 11
Gold	Kojima Chemicals Co., Ltd.	JAPAN	CID0009 81
Gold	Korea Zinc Co., Ltd.	KOREA, REPUBLIC OF	CID0026 05



Gold	Kyrgyzaltyn JSC	KYRGYZSTAN	CID0010 29
Gold	Kyshtym Copper-Electrolytic Plant ZAO	RUSSIAN FEDERATION	CID0028 65
Gold	L'azurde Company For Jewelry	SAUDI ARABIA	CID0010 32
Gold	Lingbao Gold Co., Ltd.	CHINA	CID0010 56
Gold	Lingbao Jinyuan Tonghui Refinery Co., Ltd.	CHINA	CID0010 58
Gold	L'Orfebre S.A.	ANDORRA	CID0027 62
Gold	LS-NIKKO Copper Inc.	KOREA, REPUBLIC OF	CID0010 78
Gold	Luoyang Zijin Yinhui Gold Refinery Co., Ltd.	CHINA	CID0010 93
Gold	Marsam Metals	BRAZIL	CID0026 06
Gold	Materion	UNITED STATES	CID0011 13
Gold	Matsuda Sangyo Co., Ltd.	JAPAN	CID0011 19
Gold	Metalor Technologies (Hong Kong) Ltd.	CHINA	CID0011 49
Gold	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE	CID0011 52
Gold	Metalor Technologies (Suzhou) Ltd.	CHINA	CID0011 47
Gold	Metalor Technologies S.A.	SWITZERLAND	CID0011 53
Gold	Metalor USA Refining Corporation	UNITED STATES	CID0011 57
Gold	Metalúrgica Met-Mex Peñoles S.A. De C.V.	MEXICO	CID0011 61
Gold	Mitsubishi Materials Corporation	JAPAN	CID0011 88
Gold	Mitsui Mining and Smelting Co., Ltd.	JAPAN	CID0011 93
Gold	MMTC-PAMP India Pvt., Ltd.	INDIA	CID0025 09
Gold	Modeltech Sdn Bhd	MALAYSIA	CID0028 57
Gold	Morris and Watson	NEW ZEALAND	CID0022 82
Gold	Morris and Watson Gold Coast	AUSTRALIA	CID0028 66
Gold	Moscow Special Alloys Processing Plant	RUSSIAN FEDERATION	CID0012 04

Gold	Nadir Metal Rafineri San. Ve Tic. A.Ş.	TURKEY	CID0012 20
Gold	Navoi Mining and Metallurgical Combinat	UZBEKISTAN	CID0012 36
Gold	NH Recytech Company	KOREA, REPUBLIC OF	CID0031 89
Gold	Nihon Material Co., Ltd.	JAPAN	CID0012 59
Gold	Ögussa Österreichische Gold- und Silber- Scheideanstalt GmbH	AUSTRIA	CID0027 79
Gold	Ohura Precious Metal Industry Co., Ltd.	JAPAN	CID0013 25
Gold	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	RUSSIAN FEDERATION	CID0013 26
Gold	OJSC Novosibirsk Refinery	RUSSIAN FEDERATION	CID0004 93
Gold	PAMP S.A.	SWITZERLAND	CID0013 52
Gold	Pease & Curren	UNITED STATES	CID0028 72
Gold	Penglai Penggang Gold Industry Co., Ltd.	CHINA	CID0013 62
Gold	Planta Recuperadora de Metales SpA	CHILE	CID0029 19
Gold	Prioksky Plant of Non-Ferrous Metals	RUSSIAN FEDERATION	CID0013 86
Gold	PT Aneka Tambang (Persero) Tbk	INDONESIA	CID0013 97
Gold	PX Précinox S.A.	SWITZERLAND	CID0014 98
Gold	Rand Refinery (Pty) Ltd.	SOUTH AFRICA	CID0015 12
Gold	Refinery of Seemine Gold Co., Ltd.	CHINA	CID0005 22
Gold	Remondis Argentia B.V.	NETHERLANDS	CID0025 82
Gold	Republic Metals Corporation	UNITED STATES	CID0025 10
Gold	Royal Canadian Mint	CANADA	CID0015 34
Gold	SAAMP	FRANCE	CID0027 61
Gold	Sabin Metal Corp.	UNITED STATES	CID0015 46
Gold	Safimet S.p.A	Italy	CID0029 73

Gold	SAFINA A.S.	CZECH REPUBLIC	CID0022 90
Gold	Sai Refinery	INDIA	CID0028 53
Gold	Samduck Precious Metals	KOREA, REPUBLIC OF	CID0015 55
Gold	SAMWON Metals Corp.	KOREA, REPUBLIC OF	CID0015 62
Gold	SAXONIA Edelmetalle GmbH	GERMANY	CID0027 77
Gold	Schone Edelmetaal B.V.	NETHERLANDS	CID0015 73
Gold	SEMPSA Joyería Platería S.A.	SPAIN	CID0015 85
Gold	Shandong Tiancheng Biological Gold Industrial Co., Ltd.	CHINA	CID0016 19
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CHINA	CID0016 22
Gold	Sichuan Tianze Precious Metals Co., Ltd.	CHINA	CID0017 36
Gold	Singway Technology Co., Ltd.	TAIWAN	CID0025 16
Gold	SOE Shyolkovsky Factory of Secondary Precious Metals	RUSSIAN FEDERATION	CID0017 56
Gold	Solar Applied Materials Technology Corp.	TAIWAN	CID0017 61
Gold	State Research Institute Center for Physical Sciences and Technology	LITHUANIA	CID0031 53
Gold	Sudan Gold Refinery	SUDAN	CID0025 67
Gold	Sumitomo Metal Mining Co., Ltd.	JAPAN	CID0017 98
Gold	SungEel HiTech	KOREA, REPUBLIC OF	CID0029 18
Gold	T.C.A S.p.A	ITALY	CID0025 80
Gold	Tanaka Kikinzoku Kogyo K.K.	JAPAN	CID0018 75
Gold	The Refinery of Shandong Gold Mining Co., Ltd.	CHINA	CID0019 16
Gold	Tokuriki Honten Co., Ltd.	JAPAN	CID0019 38
Gold	Tongling Nonferrous Metals Group Co., Ltd.	CHINA	CID0019 47

Gold	Tony Goetz NV	BELGIUM	CID0025 87
Gold	TOO Tau-Ken-Altyn	KAZAKHSTAN	CID0026 15
Gold	Torecom	KOREA, REPUBLIC OF	CID0019 55
Gold	Umicore Brasil Ltda.	BRAZIL	CID0019 77
Gold	Umicore Precious Metals Thailand	THAILAND	CID0023 14
Gold	Umicore S.A. Business Unit Precious Metals Refining	BELGIUM	CID0019 80
Gold	United Precious Metal Refining, Inc.	UNITED STATES	CID0019 93
Gold	Universal Precious Metals Refining Zambia	ZAMBIA	CID0028 54
Gold	Valcambi S.A.	SWITZERLAND	CID0020 03
Gold	Western Australian Mint trading as The Perth Mint	AUSTRALIA	CID0020 30
Gold	WIELAND Edelmetalle GmbH	GERMANY	CID0027 78
Gold	Yamamoto Precious Metal Co., Ltd.	JAPAN	CID0021 00
Gold	Yokohama Metal Co., Ltd.	JAPAN	CID0021 29
Gold	Yunnan Copper Industry Co., Ltd.	CHINA	CID0001 97
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA	CID0022 24
Tantalum	Asaka Riken Co., Ltd.	JAPAN	CID0000 92
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	CHINA	CID0002 11
Tantalum	D Block Metals, LLC	UNITED STATES	CID0025 04
Tantalum	Duoluoshan	CHINA	CID0004 10
Tantalum	Exotech Inc.	UNITED STATES	CID0004 56
Tantalum	F&X Electro-Materials Ltd.	CHINA	CID0004 60
Tantalum	FIR Metals & Resource Ltd.	CHINA	CID0025 05

Tantalum	Global Advanced Metals Aizu	JAPAN	CID0025 58
Tantalum	Global Advanced Metals Boyertown	UNITED STATES	CID0025 57
Tantalum	Guangdong Rising Rare Metals-EO Materials Ltd.	CHINA	CID0002 91
Tantalum	Guangdong Zhiyuan New Material Co., Ltd.	CHINA	CID0006 16
Tantalum	H.C. Starck Co., Ltd.	THAILAND	CID0025 44
Tantalum	H.C. Starck Hermsdorf GmbH	GERMANY	CID0025 47
Tantalum	H.C. Starck Inc.	UNITED STATES	CID0025 48
Tantalum	H.C. Starck Ltd.	JAPAN	CID0025 49
Tantalum	H.C. Starck Smelting GmbH & Co. KG	GERMANY	CID0025 50
Tantalum	H.C. Starck Tantalum and Niobium GmbH	GERMANY	CID0025 45
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA	CID0024 92
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHINA	CID0025 12
Tantalum	Jiangxi Tuohong New Raw Material	CHINA	CID0028 42
Tantalum	Jiujiang Janny New Material Co., Ltd.	CHINA	CID0031 91
Tantalum	Jiujiang JinXin Nonferrous Metals Co., Ltd.	CHINA	CID0009 14
Tantalum	Jiujiang Tanbre Co., Ltd.	CHINA	CID0009 17
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA	CID0025 06
Tantalum	KEMET Blue Metals	MEXICO	CID0025 39
Tantalum	KEMET Blue Powder	UNITED STATES	CID0025 68
Tantalum	King-Tan Tantalum Industry Ltd.	CHINA	CID0009 73
Tantalum	LSM Brasil S.A.	BRAZIL	CID0010 76
Tantalum	Metallurgical Products India Pvt., Ltd.	INDIA	CID0011 63
Tantalum	Mineracao Taboca S.A.	BRAZIL	CID0011 75
Tantalum	Mitsui Mining and Smelting Co., Ltd.	JAPAN	CID0011 92

Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA	CID0012 77
Tantalum	NPM Silmet AS	ESTONIA	CID0012 00
Tantalum	Power Resources Ltd.	MACEDONIA	CID0028 47
Tantalum	QuantumClean	UNITED STATES	CID0015 08
Tantalum	Resind Industria e Comercio Ltda.	BRAZIL	CID0027 07
Tantalum	RFH Tantalum Smeltry Co., Ltd.	CHINA	CID0015 22
Tantalum	Solikamsk Magnesium Works OAO	RUSSIAN FEDERATION	CID0017 69
Tantalum	Taki Chemicals	JAPAN	CID0018 69
Tantalum	Telex Metals	UNITED STATES	CID0018 91
Tantalum	Ulba Metallurgical Plant JSC	KAZAKHSTAN	CID0019 69
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	CHINA	CID0025 08
Tantalum	Yichun Jin Yang Rare Metal Co., Ltd.	CHINA	CID0023 07
Tin	Alpha	UNITED STATES	CID0002 92
Tin	An Vinh Joint Stock Mineral Processing Company	VIETNAM	CID0027 03
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CHINA	CID0002 28
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CHINA	CID0031 90
Tin	China Tin Group Co., Ltd.	CHINA	CID0010 70
Tin	CNMC (Guangxi) PGMA Co., Ltd.	CHINA	CID0002 78
Tin	CV Ayi Jaya	INDONESIA	CID0025 70
Tin	CV Dua Sekawan	INDONESIA	CID0025 92
Tin	CV Gita Pesona	INDONESIA	CID0003 06
Tin	CV Tiga Sekawan	INDONESIA	CID0025 93
Tin	CV United Smelting	INDONESIA	CID0003 15

Tin	CV Venus Inti Perkasa	INDONESIA	CID0024 55
Tin	Dowa	JAPAN	CID0004 02
Tin	Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company	VIETNAM	CID0025 72
Tin	EM Vinto	BOLIVIA	CID0004 38
Tin	Estanho de Rondônia S.A.	BRAZIL	CID0004 48
Tin	Fenix Metals	POLAND	CID0004 68
Tin	Gejiu Fengming Metallurgy Chemical Plant	CHINA	CID0028 48
Tin	Gejiu Jinye Mineral Company	CHINA	CID0028 59
Tin	Gejiu Kai Meng Industry and Trade LLC	CHINA	CID0009 42
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA	CID0005 38
Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	CHINA	CID0019 08
Tin	Gejiu Zili Mining And Metallurgy Co., Ltd.	CHINA	CID0005 55
Tin	Guangdong Hanhe Non-ferrous Metal Limited Company	CHINA	CID0031 16
Tin	Guanyang Guida Nonferrous Metal Smelting Plant	CHINA	CID0028 49
Tin	HuiChang Hill Tin Industry Co., Ltd.	CHINA	CID0028 44
Tin	Huichang Jinshunda Tin Co., Ltd.	CHINA	CID0007 60
Tin	Jiangxi Ketai Advanced Material Co., Ltd.	CHINA	CID0002 44
Tin	Jiangxi New Nanshan Technology Ltd.	CHINA	CID0012 31
Tin	Magnu's Minerais Metais e Ligas Ltda.	BRAZIL	CID0024 68
Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA	CID0011 05
Tin	Melt Metais e Ligas S.A.	BRAZIL	CID0025 00
Tin	Metallic Resources, Inc.	UNITED STATES	CID0011 42
Tin	Metallo Belgium N.V.	BELGIUM	CID0027 73

Tin	Metallo Spain S.L.U.	SPAIN	CID0027 74
Tin	Mineracao Taboca S.A.	BRAZIL	CID0011 73
Tin	Minsur	PERU	CID0011 82
Tin	Mitsubishi Materials Corporation	JAPAN	CID0011 91
Tin	Modeltech Sdn Bhd	MALAYSIA	CID0028 58
Tin	Nghe Tinh Non-Ferrous Metals Joint Stock Company	VIETNAM	CID0025 73
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND	CID0013 14
Tin	O.M. Manufacturing Philippines, Inc.	PHILIPPINES	CID0025 17
Tin	Operaciones Metalurgical S.A.	BOLIVIA	CID0013 37
Tin	Pongpipat Company Limited	MYANMAR	CID0032 08
Tin	PT Aries Kencana Sejahtera	INDONESIA	CID0003 09
Tin	PT Artha Cipta Langgeng	INDONESIA	CID0013 99
Tin	PT ATD Makmur Mandiri Jaya	INDONESIA	CID0025 03
Tin	PT Babel Inti Perkasa	INDONESIA	CID0014 02
Tin	PT Bangka Prima Tin	INDONESIA	CID0027 76
Tin	PT Bangka Serumpun	INDONESIA	CID0032 05
Tin	PT Bangka Tin Industry	INDONESIA	CID0014 19
Tin	PT Belitung Industri Sejahtera	INDONESIA	CID0014 21
Tin	PT Bukit Timah	INDONESIA	CID0014 28
Tin	PT DS Jaya Abadi	INDONESIA	CID0014 34
Tin	PT Eunindo Usaha Mandiri	INDONESIA	CID0014 38
Tin	PT Inti Stania Prima	INDONESIA	CID0025 30
Tin	PT Karimun Mining	INDONESIA	CID0014 48



Tin	PT Kijang Jaya Mandiri	INDONESIA	CID0028 29
Tin	PT Lautan Harmonis Sejahtera	INDONESIA	CID0028 70
Tin	PT Menara Cipta Mulia	INDONESIA	CID0028 35
Tin	PT Mitra Stania Prima	INDONESIA	CID0014 53
Tin	PT O.M. Indonesia	INDONESIA	CID0027 57
Tin	PT Panca Mega Persada	INDONESIA	CID0014 57
Tin	PT Premium Tin Indonesia	INDONESIA	CID0003 13
Tin	PT Prima Timah Utama	INDONESIA	CID0014 58
Tin	PT Refined Bangka Tin	INDONESIA	CID0014 60
Tin	PT Sariwiguna Binasentosa	INDONESIA	CID0014 63
Tin	PT Stanindo Inti Perkasa	INDONESIA	CID0014 68
Tin	PT Sukses Inti Makmur	INDONESIA	CID0028 16
Tin	PT Sumber Jaya Indah	INDONESIA	CID0014 71
Tin	PT Timah (Persero) Tbk Kundur	INDONESIA	CID0014 77
Tin	PT Timah (Persero) Tbk Mentok	INDONESIA	CID0014 82
Tin	PT Tinindo Inter Nusa	INDONESIA	CID0014 90
Tin	PT Tommy Utama	INDONESIA	CID0014 93
Tin	Resind Industria e Comercio Ltda.	BRAZIL	CID0027 06
Tin	Rui Da Hung	TAIWAN	CID0015 39
Tin	Soft Metais Ltda.	BRAZIL	CID0017 58
Tin	Super Ligas	Brazil	CID0027 56
Tin	Thaisarco	THAILAND	CID0018 98
Tin	Tuyen Quang Non-Ferrous Metals Joint Stock Company	VIETNAM	CID0025 74

Tin	White Solder Metalurgia e Mineração Ltda.	BRAZIL	CID0020 36
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA	CID0021 58
Tin	Yunnan Tin Company Limited	CHINA	CID0021 80
Tungsten	A.L.M.T. TUNGSTEN Corp.	JAPAN	CID0000 04
Tungsten	ACL Metais Eireli	BRAZIL	CID0028 33
Tungsten	Asia Tungsten Products Vietnam Ltd.	VIETNAM	CID0025 02
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.	CHINA	CID0025 13
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA	CID0002 58
Tungsten	Fujian Jinxin Tungsten Co., Ltd.	CHINA	CID0004 99
Tungsten	Ganzhou Haichuang Tungsten Co., Ltd.	CHINA	CID0026 45
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	CHINA	CID0008 75
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHINA	CID0023 15
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA	CID0024 94
Tungsten	Ganzhou Yatai Tungsten Co., Ltd.	CHINA	CID0025 36
Tungsten	Global Tungsten & Powders Corp.	UNITED STATES	CID0005 68
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CHINA	CID0002 18
Tungsten	H.C. Starck Smelting GmbH & Co.KG	GERMANY	CID0025 42
Tungsten	H.C. Starck Tungsten GmbH	GERMANY	CID0025 41
Tungsten	Hunan Chenzhou Mining Co., Ltd.	CHINA	CID0007 66
Tungsten	Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji	CHINA	CID0025 79
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.	CHINA	CID0007 69
Tungsten	Hunan Litian Tungsten Industry Co., Ltd.	CHINA	CID0031 82
Tungsten	Hydrometallurg, JSC	RUSSIAN FEDERATION	CID0026 49

Tungsten	Japan New Metals Co., Ltd.	JAPAN	CID0008 25
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA	CID0025 51
Tungsten	Jiangxi Dayu Longxintai Tungsten Co., Ltd.	CHINA	CID0026 47
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CHINA	CID0023 21
Tungsten	Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.	CHINA	CID0023 13
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHINA	CID0023 18
Tungsten	Jiangxi Xincheng Tungsten Industry Co., Ltd.	CHINA	CID0023 17
Tungsten	Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd.	CHINA	CID0025 35
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CHINA	CID0023 16
Tungsten	Kennametal Fallon	UNITED STATES	CID0009 66
Tungsten	Kennametal Huntsville	UNITED STATES	CID0001 05
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CHINA	CID0023 19
Tungsten	Moliren Ltd	RUSSIAN FEDERATION	CID0028 45
Tungsten	Niagara Refining LLC	UNITED STATES	CID0025 89
Tungsten	Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC	VIETNAM	CID0025 43
Tungsten	Philippine Chuangxin Industrial Co., Inc.	PHILIPPINES	CID0028 27
Tungsten	South-East Nonferrous Metal Company Limited of Hengyang City	CHINA	CID0028 15
Tungsten	Tejing (Vietnam) Tungsten Co., Ltd.	VIETNAM	CID0018 89
Tungsten	Unecha Refractory metals plant	RUSSIAN FEDERATION	CID0027 24
Tungsten	Vietnam Youngsun Tungsten Industry Co., Ltd.	VIETNAM	CID0020 11
Tungsten	Wolfram Bergbau und Hütten AG	AUSTRIA	CID0020 44

Tungsten	Woltech Korea Co., Ltd.	KOREA, REPUBLIC OF	CID0028 43
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CHINA	CID0023 20
Tungsten	Xiamen Tungsten Co., Ltd.	CHINA	CID0020 82
Tungsten	Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.	CHINA	CID0028 30
Tungsten	Xinhai Rendan Shaoguan Tungsten Co., Ltd.	CHINA	CID0020 95

**Country of Origin List:**

This list of potential countries of origin is populated based on publicly available information, our RCOI and due diligence. It is important to note that this is also based on company level responses and therefore, it is not certain which of these countries of origin can be linked to our products.

Argentina, Australia, Austria, Benin, Bolivia (Plurinational State of), Brazil, Burkina Faso, Burundi, Cambodia, Canada, Chile, China, Colombia, Congo, Democratic Republic of the, Ecuador, Eritrea, Ethiopia, France, Germany, Ghana, Guatemala, Guinea, Guyana, Honduras, India, Indonesia, Japan, Kazakhstan, Laos, Madagascar, Malaysia, Mali, Mexico, Mongolia, Mozambique, Myanmar, Namibia, Nicaragua, Nigeria, Panama, Peru, Portugal, Russian Federation, Rwanda, Senegal, Sierra Leone, South Africa, Spain, Thailand, Togo, Uganda, United Kingdom of Great Britain and Northern Ireland, United States of America, Uzbekistan, Viet Nam, Zimbabwe.