# **United States Securities and Exchange Commission**

Washington, D.C. 20549

-	FORM SD	
SPECI	ALIZED DISCLOSURE REPORT	

# **Enovis Corporation**

(Exact name of registrant as specified in its charter)

Delaware (State or other jurisdiction of incorporation) 001-34045 (Commission file number)

2711 Centerville Road, Suite 400 Wilmington, DE 19808 (Address of principal executive offices)

20701 (Zip code)

Bradley J. Tandy, Senior Vice President and Chief Legal Officer (302) 252-9160

(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:

- Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2023.
- $\square$  Rule 13q-1 under the Securities Exchange Act (17 CFR 240.13q-1) for the fiscal year ended .

#### Section 1 - Conflict Minerals Disclosure

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

As provided for in Rule 13p-1 under the Securities Exchange Act of 1934, as amended, and Form SD, a Conflict Minerals Report is provided as an exhibit to this Form SD and is available at the following Internet website: https://ir.enovis.com/sec-filings. The information contained on our website is not incorporated by reference into this Form SD or our Conflict Minerals Report and should not be considered part of this Form SD or the Conflict Minerals Report.

#### Item 1.02 Exhibit

The Conflict Minerals Report described in Item 1.01 is filed as Exhibit 1.01 to this Form SD.

#### Section 2 - Resource Extraction Issuer Disclosure

#### Item 2.01 Resource Extraction Issuer Disclosure and Report

Not applicable.

#### Section 3 - Exhibits

#### Item 3.01 Exhibits

Exhibit 1.01 - Conflict Minerals Report for the calendar year ended December 31, 2023

#### **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.

### **ENOVIS CORPORATION**

(Registrant)

/s/ Bradley J. Tandy Date: May 31, 2024 By:

Name: Bradley J. Tandy
Title: Senior Vice President and Chief Legal Officer

## EXHIBIT INDEX

Exhibit	<b>Description</b>
1.01	Conflict Minerals Report for the calendar year ended December 31, 2023

#### **Conflict Minerals Report**

Enovis Corporation has included this Conflict Minerals Report as an exhibit to its Form SD for the period from January 1, 2023 to December 31, 2023 as provided for in Rule 13p-1 under the Securities Exchange Act of 1934, as amended, and Form SD (collectively, the "Conflict Minerals Rule"). Unless the context indicates otherwise, the terms "Enovis," "we," "its," "us," and "our" refer to Enovis Corporation and its consolidated subsidiaries. As used herein, "Conflict Minerals" or "3TG" is defined as, consistent with the Conflict Minerals Rule, cassiterite, columbite-tantalite (coltan), gold, wolframite and the derivatives tin, tantalum and tungsten.

#### Forward-Looking Statements

This document contains forward-looking statements within the meaning of the federal securities laws. Any statements that do not relate to historical or current facts or matters are forward-looking statements. You can identify some of the forward-looking statements by the use of forward-looking words, such as "intend" and the like, or the use of future tense. Statements concerning current conditions may also be forward-looking if they imply a continuation of current conditions. Examples of forward-looking statements include, but are not limited to, statements concerning the additional steps that we intend to take to mitigate the risk that our necessary 3TG benefit armed groups.

Forward-looking statements are subject to risks and uncertainties that could cause actual actions or performance to differ materially from those expressed in the forward-looking statements. These risks and uncertainties include, but are not limited to, (1) the continued implementation of satisfactory traceability and other compliance measures by our direct and indirect suppliers on a timely basis or at all, (2) whether smelters and refiners and other market participants responsibly source 3TG, and (3) political, regulatory and economic developments, whether in the Democratic Republic of the Congo ("DRC") region (the "Covered Countries"), the United States or elsewhere. You are cautioned not to place undue reliance on these forward-looking statements, which speak only as of the date of filing of this document. We do not intend, and undertake no obligation, to publish revised forward-looking statements to reflect events or circumstances after the date of filing of this document or to reflect the occurrence of unanticipated events

#### **Company and Product Information**

Enovis Corporation is an innovation-driven medical technology growth company dedicated to developing clinically differentiated solutions that generate measurably better patient outcomes and transform workflows. Powered by a culture of continuous improvement, global talent and innovation, our extensive range of products, services and integrated technologies fuels active lifestyles in orthopedics and beyond.

Our continuing in-scope product categories for 2023 were orthopedic devices. For a further discussion of our products, see our Annual Report on Form 10-K for the year ended December 31, 2023. The information contained in our Form 10-K and other external materials referenced herein, including our website, is not incorporated by reference into this Conflict Minerals Report or our Form SD and should not be considered part of this Conflict Minerals Report or the Form SD.

#### Applicability of the Conflict Minerals Rule to Our Company

We are subject to the Conflict Minerals Rule because some of the products that we manufacture contain 3TG that are necessary to their functionality or production. Our in-scope products contain tin, tantalum, tungsten and gold, although no in-scope product contains all four 3TG.

We generally do not source 3TG from smelters or refiners and have no direct relationships with mines, and we believe that we are in most cases many levels removed from all of these market participants. However, through the efforts described in this Conflict Minerals Report, we seek to ensure that our sourcing practices are consistent with our Conflict Minerals Policy, which is described below, and encourage conflict free sourcing in our supply chain.

Product, smelter and refiner information in respect of 2023 is described under "Product Information" below and on <u>Annex A</u>. For 2023, we were unable to determine the origin of 3TG contained in each of our in-scope products. None of the necessary 3TG contained in our in-scope products were determined by us to directly or indirectly finance or benefit armed groups in the DRC or an adjoining country. However, we did not conclude that any of our products were "DRC conflict free." The terms "adjoining country," "armed group" and "DRC conflict free" have the meanings contained in the Conflict Minerals Rule.

#### **Our Conflict Minerals Policy**

We are committed to being a responsible corporate citizen and are opposed to human rights abuses such as are occurring in the DRC. To this end, we have adopted and communicated to our suppliers and the public a company policy (the "Conflict Minerals Policy") for the supply chain of 3TG.

The Conflict Minerals Policy includes, but is not limited to, our expectations that:

- 1. The components, parts and products supplied to us are DRC conflict free within the meaning of the Conflict Minerals Rule;
- 2. Our suppliers define, implement and communicate to sub-suppliers their own 3TG policy consistent with our Conflict Minerals Policy and the Organisation for Economic Co-operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the "OECD Guidance"); and
- 3. Our suppliers require that their direct and indirect sub-suppliers implement policies, procedures and frameworks that are consistent with the OECD Guidance, and that our suppliers otherwise work with sub-suppliers to ensure traceability of 3TG.

We do not embargo responsibly sourced 3TG from the Covered Countries or other conflict-affected and high-risk areas and encourage our suppliers to continue to source responsibly from the Covered Countries or other conflict-affected and high-risk areas, from sources that do not support conflict.

Our policy is available on our website at <a href="https://ir.enovis.com/static-files/5f7e2a02-e1de-4317-aa11-f1a284e476c0">https://ir.enovis.com/static-files/5f7e2a02-e1de-4317-aa11-f1a284e476c0</a>

#### Reasonable Country of Origin Inquiry Information

As required by the Conflict Minerals Rule, for 2023, we conducted a "reasonable country of origin inquiry" ("RCOI"). For our RCOI, to the extent applicable, we utilized the same processes and procedures as for our due diligence, in particular Steps 1 and 2 of the OECD Guidance, which are discussed below.

Our inquiry included approximately 209 suppliers (the "Suppliers") that we identified as having provided us with components, parts or products that contain 3TG or that we believe may have provided us with components, parts or products that contain 3TG. For 2023, the Suppliers identified to us 350 smelters and refiners that processed or may have processed the necessary 3TG contained in our in-scope products, as shown and described under <u>Annex A</u> below. These smelters and refiners include 225 smelters and refiners identified as "Conformant" and 6 identified as "Active," each as defined in <u>Annex A</u>. This information is based primarily on company-level declarations from Suppliers. Accordingly, many of these smelters and refiners may not be part of our supply chain, as we generally were not able to collect data at the product-level.

Based on the results of our RCOI, we exercised due diligence for 2023. These due diligence efforts are discussed below.

#### **Due Diligence Program**

#### Design Framework

We designed our due diligence measures relating to 3TG to conform with, in all material respects, the criteria set forth in the OECD Guidance, Third Edition, including the related Supplements for tin, tantalum and tungsten and for gold (hereinafter referred to as the "OECD Guidance").

#### Selected Elements of our Due Diligence Program

The OECD Guidance has established a five-step framework for due diligence as a basis for responsible global supply chain management of minerals from conflict-affected and high-risk areas. Selected elements of our due diligence program are discussed below. However, these are not all of the elements of the program that we have put in place to help ensure that the 3TG contained in our in-scope products are responsibly sourced. The headings below conform to the headings used in the OECD Guidance for each of the five steps.

- 1. <u>OECD Guidance Step One:</u> "Establish strong company management systems"
  - a. We have a Conflict Minerals Policy. We communicate the policy internally to our sourcing teams and to selected suppliers. The Conflict Minerals Policy also is posted on our website at <a href="https://ir.enovis.com/static-files/5f7e2a02-e1de-4317-aa11-f1a284e476c0">https://ir.enovis.com/static-files/5f7e2a02-e1de-4317-aa11-f1a284e476c0</a>.
  - b. We have a team of senior staff under the Senior Vice President, Supply Chain and Senior Vice President and Chief Legal Officer charged with managing our 3TG compliance strategy. We supplement our compliance efforts with specialist outside counsel.
  - c. Selected internal personnel are educated on the Conflict Minerals Rule, the OECD Guidance, our compliance plan and the procedures for reviewing and validating supplier responses to our inquiries.
  - d. We utilize the Conflict Minerals Reporting Template (the "CMRT") developed by the Responsible Minerals Initiative (the "RMI") to identify smelters and refiners in our supply chain. The CMRT requests suppliers to provide information concerning the usage and source of 3TG in their products, as well as information concerning their related compliance efforts. We utilize a third-party service provider (the "Service Provider") to conduct our supplier outreach and follow-up, as well as for the review and validation of supplier responses.
  - e. We maintain business records relating to 3TG due diligence, including records of due diligence processes, findings and resulting decisions, for at least five years.
  - f. The Service Provider provides training and educational materials to suppliers to enhance the quality of responses.
  - g. We have contractual terms relating to 3TG, which are incorporated into selected supplier contracts.
  - h. We have a mechanism for employees, suppliers and other interested parties to report violations of our Conflict Minerals Policy. The contact information for our grievance mechanism is <a href="www.enovis.ethicspoint.com">www.enovis.ethicspoint.com</a>.
- 2. <u>OECD Guidance Step Two:</u> "Identify and assess risk in the supply chain"
  - a. We requested in writing, through the Service Provider, that the Suppliers provide us with a completed CMRT. The Service Provider followed up by email or phone on our behalf with Suppliers that did not respond to the request within the specified time frame. The Service Provider followed up with non-responsive Suppliers.
  - b. The Service Provider, on our behalf, reviewed Supplier responses against its written review criteria to identify incomplete responses, potential errors and inaccuracies in the CMRTs. The Service Provider followed up by email with Suppliers that submitted a response that triggered specific quality issues relating to completeness and accuracy.

smelter and refiner information provided by Suppliers was reviewed by the Service Provider against the RMI's list of known smelters and refiners. To the extent that a smelter or refiner identified by a Supplier is not on that list, the Service Provider may take additional steps to attempt to determine whether the listed entity is a smelter or refiner. Smelter and refiner information also was reviewed against the lists of Conformant and Active smelters and refiners published by the RMI. 225 of the identified smelters and refiners were listed as Conformant by the RMI and 6 were listed as Active, as of April 30, 2023. Please see Annex A below for further information regarding the smelters and refiners identified to us through our RCOI and due diligence.

The Service Provider bases its country of origin determinations on publicly available information, its outreach to smelters and refiners and information provided by suppliers in their completed CMRTs. Consistent with the foregoing, to the extent that a smelter or refiner identified by a Supplier was not listed as Conformant by the RMI, the Service Provider undertook an additional review to attempt to determine whether that smelter or refiner obtained 3TG from sources that directly or indirectly financed or benefitted armed groups in the Covered Countries.

The Service Provider attempted to reach out to the smelter or refiner directly and conducted research to gain more information about the smelter's or refiner's sourcing practices, including the countries of origin of the minerals that it processes, the transit and transfer of the minerals that it processes and whether it has in place internal due diligence procedures or other processes to track the chain-of-custody of its 3TG.

- d. The Service Provider evaluated Suppliers' due diligence processes and policies based on the Suppliers' responses to certain of the questions in the CMRT. These questions ask suppliers about their internal processes regarding 3TG.
- e. We take steps to gather additional information from suppliers whose responses lead us to believe additional information is warranted to help ensure that our supply chain is responsibly sourcing 3TG. This may include requesting product-specific CMRTs or other information.
- 3. <u>OECD Guidance Step Three:</u> "Design and implement a strategy to respond to identified risks"
  - a. Our 3TG compliance team reviewed the reports and evaluations prepared by the Service Provider and liaised with appropriate members of senior management in our legal and supply chain teams, including our Senior Vice President, Supply Chain and Senior Vice President and Chief Legal Officer, regarding the results of our Supplier outreach.
  - b. We undertake additional internal reviews with our legal and supply chain teams on a periodic basis using the information provided by the Service Provider, our suppliers and our independent inquiries, and respond via supplier follow-up, commercial escalation or other commensurate means to the risks identified via these reviews.
- 4. <u>OECD Guidance Step Four:</u> "Carry out independent third-party audit of supply chain due diligence at identified points in the supply chain"

In connection with our due diligence, we utilize and rely on information made available by the RMI concerning independent third-party audits of smelters and refiners to assess smelter and refiner due diligence.

5. <u>OECD Guidance Step Five</u>: "Report on supply chain due diligence"

We file a Form SD and Conflict Minerals Report with the Securities and Exchange Commission and make these filings available on our website at http://ir.enovis.com/sec-filings.

#### **Identified Smelters and Refiners**

In connection with our RCOI or due diligence, as applicable, the Suppliers identified to us the smelters and refiners listed on Annex A below either as part of our supply chain or as potentially having processed the necessary 3TG contained in our in-scope products in 2023. Due to our position in the supply chain, which is discussed earlier in this Conflict Minerals Report, we rely on our suppliers for accurate smelter and refiner information and our due diligence measures do not provide absolute certainty regarding the source and chain of custody of the necessary 3TG contained in our in-scope products.

We endeavored to determine the mine or location of origin of the 3TG contained in our in-scope products by requesting that the Suppliers provide us or our Service Provider with a completed CMRT, and through the other activities described herein that were taken by us or the Service Provider.

#### **Future Risk Mitigation Efforts**

We intend to take the following additional steps to mitigate the risk that the necessary 3TG in our in-scope products benefit armed groups in the Covered Countries. These steps are in addition to the steps that we took in respect of 2023 described in this Conflict Minerals Report, which we intend to continue to take in respect of 2024 to the extent applicable.

- 1. Engage with applicable Suppliers that provided non-Conformant smelters and refiners, incomplete responses or that did not provide responses for 2023 to help ensure that they provide requested information for 2024.
  - Engage in additional outreach to Suppliers with non-Conformant responses;
  - Conduct further training for Suppliers; and
  - Work to identify improved contacts for non-respondents.
- 2. Encourage the continuing development and progress of traceability measures at Suppliers that indicated for 2023 that the source of 3TG was unknown or undeterminable.
- 3. Continue communicating to suppliers our sourcing expectations, including through the dissemination of the Conflict Minerals Policy to them and required adherence to contractual sourcing requirements.

#### Annex A

Capitalized terms used and not otherwise defined in this Annex have the meanings set forth in the Conflict Minerals Report of which this Annex is a part.

#### **Smelters and Refiners**

In connection with our RCOI or due diligence, as applicable, the Suppliers identified to us the smelters and refiners listed below as either being part of our supply chain or as potentially having processed the necessary 3TG contained in our in-scope products in 2023. Please see the accompanying notes for additional information concerning the tables.

#### **Smelter and Refiner Names and Status**

Metal	Standard Smelter Name	Smelter Facility Location
Gold	8853 S.p.A.	Italy
Gold	ABC Refinery Pty Ltd.	Australia
Gold	Abington Reldan Metals, LLC	United States Of America
Gold	Advanced Chemical Company	United States Of America
Gold	African Gold Refinery	Uganda
Gold	Agosi AG	Germany
Gold	Aida Chemical Industries Co., Ltd.	Japan
Gold	Al Etihad Gold Refinery DMCC	United Arab Emirates
Gold	Albino Mountinho Lda.	Portugal
Gold	Alexy Metals	United States Of America
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	Asahi Refining Canada Ltd.	Canada
Gold	Asahi Refining USA Inc.	United States Of America
Gold	Asaka Riken Co., Ltd.	Japan
Gold	Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	Turkey
Gold	AU Traders and Refiners	South Africa
Gold	Augmont Enterprises Private Limited	India
Gold	Aurubis AG	Germany
Gold	Bangalore Refinery	India

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 CGR Metallovs Pvt Ltd. India Gold Chimet S.p.A. Italy Chugai Mining Gold Japan Coimpa Industrial LTDA Brazil Gold Gold Daye Non-Ferrous Metals Mining Ltd. China Gold Degussa Sonne / Mond Goldhandel GmbH Germany Gold Dijllah Gold Refinery FZC United Arab Emirates Gold Dongwu Gold Group China Gold Dowa Japan Gold DSC (Do Sung Corporation) Korea, Republic Of Eco-System Recycling Co., Ltd. East Plant Gold Japan Gold Eco-System Recycling Co., Ltd. North Plant Japan Gold Eco-System Recycling Co., Ltd. West Plant Japan Gold Emerald Jewel Industry India Limited (Unit 1) India Emerald Jewel Industry India Limited (Unit 2) Gold India Emerald Jewel Industry India Limited (Unit 3) Gold India Emerald Jewel Industry India Limited (Unit 4) India Gold United Arab Emirates GoldEmirates Gold DMCC Gold Fidelity Printers and Refiners Ltd. Zimbabwe Fujairah Gold FZC United Arab Emirates Gold Gold GG Refinery Ltd. Tanzania, United Republic Of Gold GGC Gujrat Gold Centre Pvt. Ltd. India Gold Gold by Gold Colombia Colombia Gold Coast Refinery Ghana Gold Gold Gold Refinery of Zijin Mining Group Co., Ltd. China Gold Great Wall Precious Metals Co., Ltd. of CBPM China Gold Guangdong Jinding Gold Limited China

China

Guoda Safina High-Tech Environmental Refinery Co., Ltd.

Gold

Gold Hangzhou Fuchunjiang Smelting Co., Ltd. China Heimerle + Meule GmbH Gold Germany Gold Heraeus Germany GmbH Co. KG Germany Heraeus Metals Hong Kong Ltd. Gold China Gold Hunan Chenzhou Mining Co., Ltd. China Gold Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd. China

Gold HwaSeong CJ CO., LTD. Korea, Republic Of Gold Industrial Refining Company Belgium

Gold Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. China
Gold International Precious Metal Refiners United Arab Emirates

Japan

Turkey

Gold International Precious Metal Refiners
Gold Ishifuku Metal Industry Co., Ltd.
Gold Istanbul Gold Refinery
Gold Italpreziosi

GoldItalpreziosiItalyGoldJALAN & CompanyIndiaGoldJapan MintJapanGoldJiangxi Copper Co., Ltd.China

GoldJSC Ekaterinburg Non-Ferrous Metal Processing PlantRussian FederationGoldJSC Novosibirsk RefineryRussian FederationGoldJSC UralelectromedRussian Federation

Gold JX Nippon Mining & Metals Co., Ltd. Japan
Gold K.A. Rasmussen Norway

Gold Kaloti Precious Metals United Arab Emirates
Gold Kazakhmys Smelting LLC Kazakhstan

Gold Kazzine Kazakhstan
Gold Kennecott Utah Copper LLC United States Of America

Gold KGHM Polska Miedz Spolka Akcyjna Poland
Gold Kojima Chemicals Co., Ltd. Japan
Gold Korea Zinc Co., Ltd. Korea, Republic Of

Gold Kundan Care Products Ltd. India
Gold Kyrgyzaltyn JSC Kyrgyzstan

Gold Kyshtym Copper-Electrolytic Plant ZAO Russian Federation
Gold L'azurde Company For Jewelry Saudi Arabia
Gold Lingbao Gold Co., Ltd. China

Gold Lingbao Gold Co., Ltd. China
Gold Lingbao Jinyuan Tonghui Refinery Co., Ltd. China

Gold L'Orfebre S.A. Andorra LS-NIKKO Copper Inc. Gold Korea, Republic Of Korea, Republic Of Gold LT Metal Ltd. Gold Luoyang Zijin Yinhui Gold Refinery Co., Ltd. China Gold Marsam Metals Brazil Gold United States Of America Materion Gold Matsuda Sangyo Co., Ltd. Japan Gold MD Overseas India Metal Concentrators SA (Pty) Ltd. South Africa Gold Metallix Refining Inc. United States Of America Gold Gold Metalor Technologies (Hong Kong) Ltd. China Gold Metalor Technologies (Singapore) Pte., Ltd. Singapore Gold Metalor Technologies (Suzhou) Ltd. China Gold Metalor Technologies S.A. Switzerland United States Of America Gold Metalor USA Refining Corporation 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 MKS PAMP SA Switzerland Gold MMTC-PAMP India Pvt., Ltd. India Gold Modeltech Sdn Bhd Malaysia New Zealand Gold Morris and Watson Moscow Special Alloys Processing Plant Russian Federation Gold Turkey Nadir Metal Rafineri San. Ve Tic. A.S. Gold Navoi Mining and Metallurgical Combinat Uzbekistan NH Recytech Company Korea, Republic Of Gold Nihon Material Co., Ltd. Japan Gold Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH Austria

Gold Gold

Gold Ohura Precious Metal Industry Co., Ltd. Japan

OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) Gold Gold Pease & Curren

Gold Penglai Penggang Gold Industry Co., Ltd. Gold Planta Recuperadora de Metales SpA Gold Prioksky Plant of Non-Ferrous Metals

Chile Russian Federation

China

Russian Federation

United States Of America

Gold PT Aneka Tambang (Persero) Tbk Indonesia Gold PX Precinox S.A. Switzerland Gold QG Refining, LLC United States Of America Rand Refinery (Pty) Ltd. South Africa Gold Refinery of Seemine Gold Co., Ltd. Gold China Gold REMONDIS PMR B.V. Netherlands Gold Royal Canadian Mint Canada Gold SAAMP France Sabin Metal Corp. United States Of America Gold Safimet S.p.A Gold Italy Gold SAFINA A.S. Czechia Gold Sai Refinery India Gold Sam Precious Metals United Arab Emirates Gold Samduck Precious Metals Korea, Republic Of Korea, Republic Of Gold Samwon Metals Corp. Gold SEMPSA Joyeria Plateria S.A. Spain Shandong Gold Smelting Co., Ltd. China Gold Gold Shandong Humon Smelting Co., Ltd. China Gold Shandong Tiancheng Biological Gold Industrial Co., Ltd. China Gold Shandong Zhaojin Gold & Silver Refinery Co., Ltd. China Shenzhen CuiLu Gold Co., Ltd. Gold China Shenzhen Zhonghenglong Real Industry Co., Ltd. Gold China Shirpur Gold Refinery Ltd. India Gold Sichuan Tianze Precious Metals Co., Ltd. China Gold Singway Technology Co., Ltd. Gold Taiwan, Province Of China SOE Shyolkovsky Factory of Secondary Precious Metals Russian Federation Gold Gold Solar Applied Materials Technology Corp. Taiwan, Province Of China Gold Sovereign Metals India Gold State Research Institute Center for Physical Sciences and Technology Lithuania Sudan Gold Refinery Gold Sudan Gold Sumitomo Metal Mining Co., Ltd. Japan SungEel HiMetal Co., Ltd. Gold Korea, Republic Of

Gold	Super Dragon Technology Co., Ltd.	Taiwan, Province Of China
Gold	T.C.A S.p.A	Italy
Gold	Tanaka Kikinzoku Kogyo K.K.	Japan
Gold	Tokuriki Honten Co., Ltd.	Japan
Gold	Tongling Nonferrous Metals Group Co., Ltd.	China
Gold	TOO Tau-Ken-Altyn	Kazakhstan
Gold	Torecom	Korea, Republic Of
Gold	Umicore Precious Metals Thailand	Thailand
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	WEEEREFINING	France
Gold	Western Australian Mint (T/a The Perth Mint)	Australia
Gold	WIELAND Edelmetalle GmbH	Germany
Gold	Yamakin Co., Ltd.	Japan
Gold	Yokohama Metal Co., Ltd.	Japan
Gold	Yunnan Copper Industry Co., Ltd.	China
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	China

Tantalum 5D Production OU Estonia
Tantalum AMG Brasil Brazil

Tantalum D Block Metals, LLC United States Of America
Tantalum F&X Electro-Materials Ltd. China

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 Rising Rare Metals-EO Materials Ltd.

China

China

Tantalum Hengyang King Xing Lifeng New Materials Co., Ltd. China Tantalum Jiangxi Dinghai Tantalum & Niobium Co., Ltd. China Tantalum Jiangxi Tuohong New Raw Material China Tantalum JiuJiang JinXin Nonferrous Metals Co., Ltd. China Tantalum Jiujiang Tanbre Co., Ltd. China Tantalum Jiujiang Zhongao Tantalum & Niobium Co., Ltd. China

Tantalum KEMET de Mexico Mexico
Tantalum Materion Newton Inc. United States Of America

TantalumMetallurgical Products India Pvt., Ltd.IndiaTantalumMineracao Taboca S.A.BrazilTantalumMitsui Mining and Smelting Co., Ltd.JapanTantalumNingxia Orient Tantalum Industry Co., Ltd.China

Tantalum Ningxia Orient Tantalum Industry Co., Ltd. China
Tantalum NPM Silmet AS Estonia
Tantalum PowerX Ltd. Rwanda
Tantalum QuantumClean United S

Tantalum QuantumClean United States Of America
Tantalum Resind Industria e Comercio Ltda. Brazil

Tantalum RFH Yancheng Jinye New Material Technology Co., Ltd. China
Tantalum Solikamsk Magnesium Works OAO Russian Federation

TantalumTaki Chemical Co., Ltd.JapanTantalumTANIOBIS Co., Ltd.ThailandTantalumTANIOBIS GmbHGermanyTantalumTANIOBIS Japan Co., Ltd.Japan

Tantalum TANIOBIS Sapan Co., Etc. Sapan Tantalum TANIOBIS Smelting GmbH & Co. KG Germany

Tantalum Telex Metals United States Of America

Tantalum Ulba Metallurgical Plant JSC Kazakhstan

TantalumXIMEI RESOURCES (GUANGDONG) LIMITEDChinaTantalumXinXing HaoRong Electronic Material Co., Ltd.China

Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	China
Tin	Alpha	United States Of America
Tin	An Vinh Joint Stock Mineral Processing Company	Viet Nam
Tin	Aurubis Beerse	Belgium
Tin	Aurubis Berango	Spain
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	China
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	China
Tin	China Tin Group Co., Ltd.	China
Tin	CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda	Brazil
Tin	CRM Synergies	Spain
Tin	CV Ayi Jaya	Indonesia
Tin	CV Venus Inti Perkasa	Indonesia
Tin	Dongguan CiEXPO Environmental Engineering Co., Ltd.	China
Tin	Dowa	Japan
Tin	DS Myanmar	Myanmar
Tin	Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company	Viet Nam
Tin	EM Vinto	Bolivia (Plurinational State Of)
Tin	Estanho de Rondonia S.A.	Brazil
Tin	Fabrica Auricchio Industria e Comercio Ltda.	Brazil
Tin	Fenix Metals	Poland
Tin	Gejiu City Fuxiang Industry and Trade Co., Ltd.	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	HuiChang Hill Tin Industry Co., Ltd.	China
Tin	Jiangxi New Nanshan Technology Ltd.	China
Tin	Luna Smelter, Ltd.	Rwanda
Tin	Ma'anshan Weitai Tin Co., Ltd.	China
Tin	Magnu's Minerais Metais e Ligas Ltda.	Brazil
Tin	Malaysia Smelting Corporation (MSC)	Malaysia
Tin	Malaysia Smelting Corporation Berhad (Port Klang)	Malaysia

Tin Melt Metais e Ligas S.A. United States Of America Tin Metallic Resources, Inc. Tin Mineracao Taboca S.A. Brazil Tin Mining Minerals Resources SARL Congo, Democratic Republic Of The Tin Minsur Peru Tin Mitsubishi Materials Corporation Japan Tin Modeltech Sdn Bhd Malaysia Tin Nghe Tinh Non-Ferrous Metals Joint Stock Company Viet Nam Russian Federation Novosibirsk Tin Combine Tin Tin O.M. Manufacturing (Thailand) Co., Ltd. Thailand Tin O.M. Manufacturing Philippines, Inc. Philippines Tin Operaciones Metalurgicas S.A. Bolivia (Plurinational State Of) Tin Pongpipat Company Limited Myanmar Tin Precious Minerals and Smelting Limited India PT Aries Kencana Sejahtera Tin Indonesia Tin PT Artha Cipta Langgeng Indonesia PT ATD Makmur Mandiri Jaya Tin Indonesia Tin PT Babel Inti Perkasa Indonesia Tin PT Babel Surya Alam Lestari Indonesia Tin PT Bangka Prima Tin Indonesia Tin PT Bangka Serumpun Indonesia PT Bangka Tin Industry Tin Indonesia PT Belitung Industri Sejahtera Tin Indonesia Tin PT Bukit Timah Indonesia Tin PT Cipta Persada Mulia Indonesia PT Menara Cipta Mulia Tin Indonesia Tin PT Mitra Stania Prima Indonesia Tin PT Mitra Sukses Globalindo Indonesia Tin PT Panca Mega Persada Indonesia PT Premium Tin Indonesia Tin Indonesia Tin PT Prima Timah Utama Indonesia Tin PT Putera Sarana Shakti (PT PSS) Indonesia Tin PT Rajawali Rimba Perkasa Indonesia Tin PT Rajehan Ariq Indonesia

Tin PT Refined Bangka Tin Indonesia PT Sariwiguna Binasentosa Tin Indonesia Tin PT Stanindo Inti Perkasa Indonesia Tin PT Sukses Inti Makmur Indonesia Tin PT Timah Nusantara Indonesia Tin PT Timah Tbk Kundur Indonesia Tin PT Timah Tbk Mentok Indonesia Tin PT Tinindo Inter Nusa Indonesia PT Tirus Putra Mandiri Tin Indonesia Tin PT Tommy Utama Indonesia Tin Resind Industria e Comercio Ltda. Brazil

Tin Rui Da Hung Taiwan, Province Of China

TinSuper LigasTinThaisarcoTinTin Smelting Branch of Yunnan Tin Co., Ltd.

Tin

Tin Tin Technology & Refining United States Of America

Brazil

China

Thailand

Viet Nam

Tin VQB Mineral and Trading Group JSC Viet Nam Tin White Solder Metalurgia e Mineracao Ltda. Brazil Tin Yunnan Chengfeng Non-ferrous Metals Co., Ltd. China Tin Yunnan Yunfan Non-ferrous Metals Co., Ltd. China A.L.M.T. Corp. Tungsten Japan Tungsten ACL Metais Eireli Brazil

Tuyen Quang Non-Ferrous Metals Joint Stock Company

Tungsten Albasteel Industria e Comercio de Ligas Para Fundicao Ltd. Brazil
Tungsten Artek LLC Russian Federation

Tungsten Asia Tungsten Products Vietnam Ltd. Viet Nam

Tungsten China Molybdenum Tungsten Co., Ltd. China
Tungsten Chongyi Zhangyuan Tungsten Co., Ltd. China
Tungsten CNMC (Guangxi) PGMA Co., Ltd. China
Tungsten Cronimet Brasil Ltda Brazil

Tungsten DONGKUK INDUSTRIES CO., LTD. Korea, Republic Of

TungstenFujian Xinlu Tungsten Co., Ltd.ChinaTungstenGanzhou Jiangwu Ferrotungsten Co., Ltd.ChinaTungstenGanzhou Seadragon W & Mo Co., Ltd.China

Tungsten Global Tungsten & Powders LLC Guangdong Xianglu Tungsten Co., Ltd. Tungsten Tungsten H.C. Starck Tungsten GmbH

HANNAE FOR T Co., Ltd. Tungsten Hubei Green Tungsten Co., Ltd. Tungsten Tungsten

Hunan Chenzhou Mining Co., Ltd. Tungsten Hunan Jintai New Material Co., Ltd.

Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch Tungsten

Hydrometallurg, JSC Tungsten Tungsten Japan New Metals Co., Ltd.

Jiangwu H.C. Starck Tungsten Products Co., Ltd. Tungsten

Tungsten Jiangxi Gan Bei Tungsten Co., Ltd.

Tungsten Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. Tungsten Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.

Jiangxi Xinsheng Tungsten Industry Co., Ltd. Tungsten Tungsten Jiangxi Yaosheng Tungsten Co., Ltd. Tungsten JSC "Kirovgrad Hard Alloys Plant" Tungsten Kenee Mining Corporation Vietnam

Tungsten Kennametal Fallon Tungsten Kennametal Huntsville Tungsten Lianyou Metals Co., Ltd. Tungsten Lianyou Resources Co., Ltd.

Tungsten LLC Vostok

Tungsten Malipo Haiyu Tungsten Co., Ltd. Tungsten Masan High-Tech Materials

Tungsten Moliren Ltd.

Tungsten Nam Viet Cromit Joint Stock Company

Tungsten Niagara Refining LLC NPP Tyazhmetprom LLC Tungsten Tungsten OOO "Technolom" 1 Tungsten OOO "Technolom" 2

Tungsten Philippine Chuangxin Industrial Co., Inc. United States Of America

China Germany

Korea, Republic Of

China China China China

Russian Federation

Japan China China China China China China

Russian Federation

Viet Nam

United States Of America United States Of America Taiwan, Province Of China Taiwan, Province Of China

Russian Federation

China Viet Nam

Russian Federation

Viet Nam

United States Of America Russian Federation Russian Federation Russian Federation

Philippines

Tungsten Shinwon Tungsten (Fujian Shanghang) Co., Ltd. China TANIOBIS Smelting GmbH & Co. KG Tungsten Germany Tungsten Tungsten Vietnam Joint Stock Company Viet Nam Tungsten Unecha Refractory metals plant Russian Federation Tungsten Wolfram Bergbau und Hutten AG Austria Tungsten Xiamen Tungsten (H.C.) Co., Ltd. China Tungsten Xiamen Tungsten Co., Ltd. China Tungsten YUDU ANSHENG TUNGSTEN CO., LTD. China

We note the following in connection with the information contained in the foregoing tables:

- (a) The smelters and refiners reflected in the table were identified by the Suppliers to us as potentially being part of our 2023 supply chain. However, not all of the included smelters and refiners are believed by us to have processed the necessary 3TG contained in our in-scope products, since most Suppliers reported to us at a "company level" the 3TG contained in all of their products, not just those in the products that they sold to us. Some Suppliers also may have reported to us smelters and refiners that were not in our supply chain due to overinclusiveness in the information received from their suppliers or for other reasons. The smelters and refiners reflected above may not be all of the smelters and refiners in our supply chain, since many Suppliers were unable to identify all of the smelters and refiners used to process the necessary 3TG content contained in our in-scope products and not all of the Suppliers responded to our inquiries.
- (b) All compliance status information in the tables is as of April 30, 2024. Compliance status is based on information published by the RMI, without independent verification by us.
- (c) The table includes only entities that are listed as verified smelters on the Smelter Look-up list tab of the CMRT.
- (d) Smelter and refiner country location and status is based on information published by the RMI, without independent verification by us.

#### **Country of Origin Information**

The identified countries of origin of the 3TG processed by the smelters and refiners listed in the table above may have included the countries below, based on publicly available information, our RCOI and due diligence and other information gathered by the Service Provider. These may not be all of the countries of origin from which the smelters and refiners listed above may have sourced 3TG.

Albania	Dominican Republic	Kenya	Russian Federation
Andorra	Ecuador	Korea	Rwanda*
Angola*	Egypt	Kyrgyzstan	Saudi Arabia
Argentina	El Salvador	Liberia	Senegal
Armenia	Eritrea	Liechtenstein	Serbia
Australia	Estonia	Lithuania	Sierra Leone
Austria	Ethiopia	Luxembourg	Singapore

Fiji Azerbaijan Madagascar Slovakia Finland Belarus Malaysia Solomon Islands Belgium France Mali South Africa Benin Georgia Mauritania South Sudan\* Bermuda Germany Mexico Spain Bolivia (Plurinational State of) Ghana Mongolia Sudan Botswana Guam Morocco Suriname Brazil Guatemala Mozambique Sweden Bulgaria Guinea Myanmar Switzerland Burkina Faso Guyana Namibia Taiwan Burundi\* Honduras Netherlands Tajikistan Cambodia Hong Kong New Zealand Tanzania\* Canada Hungary Nicaragua Thailand Central African Republic\* India Niger Togo Chile Indonesia Nigeria Turkey China Ireland Norway Uganda\* Israel Oman

Colombia United Arab Emirates Republic of the Congo\* Italy Panama United Kingdom Cyprus Ivory Coast Papua New Guinea United States Democratic Republic of the Congo\* Japan Peru Uruguay Djibouti Jersey Philippines Uzbekistan Dominica Kazakhstan Poland Viet Nam Zambia\* Portugal

#### \* Covered Country.

Alternatively, or in addition, some of the smelters and refiners may have sourced from recycled or scrap sources.