

1. Introduction

This Conflict Minerals Report of **Hypertechnologie Ciara Inc.** (**Hypertechnologie Ciara** or we) for the year ended December 31, 2022, is presented to comply with its responsible sourcing policy. This policy was created by our company to implement requirements related to “conflict minerals, which are currently limited to tantalum, tin, and tungsten.

Our policy establish certain reporting requirements on SEC registrants whose products contain conflict minerals that are necessary to the functionality or production of their products (referred to as “conflict minerals”). For products that contain necessary conflict minerals, the registrant must conduct in good faith a reasonable country of origin inquiry designed to determine whether any of the necessary conflict minerals originated in the Democratic Republic of the Congo (DRC) or an adjoining country (collectively, the “Covered Countries”). If, based on such inquiry, the registrant knows or has reason to believe that any of the necessary conflict minerals originated or may have originated in a Covered Country and may not be solely from recycled or scrap sources, the registrant must conduct due diligence review to determine if the necessary conflict minerals directly or indirectly financed or benefited armed groups (as defined by the SEC) in the Covered Countries.

As set forth in our Responsible Minerals Sourcing Policy, **Hypertechnologie Ciara Inc** is committed to the responsible sourcing of minerals, which we define as sourcing done in an ethical and sustainable manner that safeguards the human rights of everyone in our global supply chain. We also continue to examine human rights risks in Conflict-Affected and High-Risk Areas (CAHRAs) globally, as defined 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, Third Edition, and related Supplements on Tin, Tantalum and Tungsten and on Gold (collectively, “OECD Guidance”). While the focus of this Report is on conflict minerals and the Covered Countries, **Hypertechnologie Ciara Inc** is electing to also describe the proactive due diligence review we began in 2021.

Many of our hardware products contain tantalum, tin, tungsten and/or gold necessary to the functionality or production of those products. Conflict minerals are obtained from sources worldwide, and our desire is not to eliminate those originating in the Covered Countries and other CAHRAs, but rather to obtain conflict minerals from sources that do not directly or indirectly finance, or benefit armed groups or contribute to human rights abuses. We believe that it is important for us and other companies to support responsible in-region mineral sourcing from the Covered Countries and other CAHRAs and to not negatively affect the economies of such countries.

We recognize that broad collaborative efforts among governments, non-governmental organizations (NGOs), civil society experts, and industry are needed to identify and mitigate the risk of contributing to serious human rights abuses and conflict related to mineral extraction in the Covered Countries. **Hypertechnologie Ciara Inc** is a proactive member of the Responsible Minerals Initiative (RMI) since 2020. **Hypertechnologie Ciara Inc** is also recently member of the Public-Private Alliance for Responsible Minerals Trade (PPA), which promotes responsibly sourced minerals from the Covered Countries.

Being a proactive member of RMI and PPA providing and receiving valuable insights within our vast global supply chain is a crucial component to our responsible minerals program.

2. Objectives

Hypertechnologie Ciara Inc's report demonstrates the results of the compliance of its internal control over its immediate suppliers and coordinate efforts through industry-wide initiatives to build leverage over sub-suppliers assuring the following objectives:

- To safeguard smelters and refiners participation in OECD-aligned third-party mechanism such as «Responsible Minerals Initiatives (RMI)» being part of Conflict-Free Smelter and Refiner Program.
- To assure that $\geq 90\%$ of the number of smelters and refiners of all conflict minerals reported to be in our supply chain for products covered by the standard IEEE Std 1680.1a-2020.
- Smelter and Refiners must be in completion of the audit called «Responsible Minerals Assurance Process (RMAP)» that demonstrates compliance to the third-party mechanism protocols based on OECD guidelines.
- Smelter and Refiners shall demonstrate conformance with the first three objectives by establishing public commitment being listed as participating of third-party program such as «Responsible Minerals Initiatives (RMI)» or other industry associations such as «The London Bullion Market Association (LBMA)» and «Responsible Jewelry Council (RJC)» respectively and taken actions established in their policies or agreements.
- To be aligned with the mineral responsible sourcing strategies where «The Responsible Minerals Initiatives (RMI)» , a multi-industry initiative, is working on. These strategies are subjected to the «Conflict- Affected and High-Risk Areas (CAHRAs) or/and « Covered Countries» such as **The Democratic Republic of the Congo (DRC) and the nine adjoining countries such as Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.** These strategies are related to the following elements:
 - Conducts self-assessment and on-site audits
 - Improved governance
 - Capacity building
 - Traceability
 - Mitigate Environmental, Social and Governance risks related to minerals production and trade.
 - Mechanisms of stakeholder's engagement.
- To demonstrate «**The Responsible Minerals Initiatives (RMI)**» accountability on this program.

3. Scope

- This report covers the whole product portfolio based on the substance inventory of our materials of its materials (components and parts)
- This report covers the Participation of Smelters and Refiners in a third-party mechanism that is aligned with the OECD Due Diligence Guidance for Supply Chains of Minerals Regions **from «Conflict- Affected and High-Risk Areas (CAHRAs)»** and assesses due diligence for sourcing from **«Covered Countries or Conflict-Affected and High-Risk»**
- This report covers the assessment of the «Responsible Minerals Initiatives (RMI)» specifically the Upstream Assessment Program under the Responsible Minerals Assurance Process (RMAP)
- This report does not cover Smelters and Refiners of Recycled or Scrap Mineral which are covered by the Downstream Assessment Program of RMI.

4. Definitions

- **Conflict Mineral:** As defined in 2010 United States legislation, Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502(e)(4):
CONFLICT MINERAL.—The term “conflict mineral” means—
(A) columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives; or
(B) any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country.
- **Conflict-Affected and High-Risk Area (CAHRA):** These are areas in a state of armed conflict, fragile post-conflict areas, as well as areas witnessing weak or non-existing governance and security, such as failed states, and widespread and systematic violations of international law, including human rights abuses.
- **DRC:** Democratic Republic of Congo.
- **Gold (Au) refiner (smelter):** A gold refiner is a metallurgical operation that produces fine gold with a concentration of 99.5% or higher from gold and gold-bearing materials with lower concentrations.
- **OECD:** Organization for Economic Co-operation and Development.
- **RBA:** Responsible Business Alliance.
- **Recycled or Scrap Sources:** Recycled or scrap sources are recycled metals, which are reclaimed end-user or post-consumer products, or scrap processed metals created during product manufacturing. Recycled metal includes excess, obsolete, defective, and scrap metal materials that contain refined or processed metals that are appropriate to recycle in the production of tin, tantalum, tungsten and/or gold. Minerals partially processed, unprocessed or by-products from other ores are not included in the definition of recycled metal.
- **Responsible Minerals Assurance Process (RMAP):** The Responsible Minerals Assurance Process (RMAP) is a process developed by the RBA to enhance company capability to verify the responsible sourcing of metals.
- **Responsible Minerals Initiative:** Founded in 2008 by members of the Responsible Business Alliance, the Responsible Minerals Initiative has grown into one of the most utilized and respected resources for companies addressing conflict minerals issues in their supply chains. Over 360 companies from ten different industries participate in the RMI today, contributing to a range of tools and resources including the Responsible Minerals Assurance Process, the Conflict Minerals Reporting Template, Reasonable

Country of Origin Inquiry data and a range of guidance documents on conflict minerals sourcing. The RMI also runs regular workshops on conflict minerals issues and contributes to policy development and debates with leading civil society organizations and governments.

- **RMAP Conformant Smelter List:** The Responsible Minerals Assurance Process (RMAP) Conformant Smelter List is a published list of smelters and refiners that have undergone assessment through the RMAP, a program of the Responsible Minerals Initiative (RMI) or industry equivalent program (such as Responsible Jewellery Council or London Bullion Market Association) and have been validated to be in conformance with the protocols. If a smelter or refiner is not on the list, it has either not completed a RMAP assessment or is not in conformance with the RMAP protocol.
- **SEC:** U.S. Securities and Exchange Commission.
- **Smelter:** A smelter or refiner is a company that procures and processes mineral ore, slag and/or materials from recycled or scrap sources into refined metal or metal containing intermediate products. The output can be pure (99.5% or greater) metals, powders, ingots, bars, grains, oxides or salts. The terms “smelter” and “refiner” are used interchangeably throughout various publications.
- **Smelter Identification Number:** A unique identification number the RMI assigns to companies that have been reported by members of the supply chain as smelters or refiners, whether or not they have been verified to meet the characteristics of smelters or refiners as defined in the RMAP audit protocols.
- **Tantalum (Ta) smelter:** A tantalum smelter (also known as a processor) is defined as a company that converts Ta-containing ores, concentrates, slags or secondary materials into tantalum intermediate products or other tantalum containing products for direct sales or further processing into Ta-containing products, such as Ta powders, Ta components, Ta oxides, alloys, wires, sintered bars, etc.
- **Tin (Sn) smelter:** Primary [tin] smelters are companies with one or more facilities treating tin containing ore concentrates in order to produce tin metal. Secondary [tin] smelters are companies with one or more facilities that treat secondary materials by reduction for the production of crude or higher-grade tin or tin product such as solder. A smelter as referred to within this audit protocol may operate as either one or both types of business operation.
- **Tungsten (W) smelter:** A company with one or more facilities that converts W-containing ores (such as wolframite and scheelite), W concentrates, or W-bearing scrap (secondary material) into tungsten containing intermediates such as Ammonium Para-Tungstate (APT), Ammonium Meta-Tungstate (AMT), ferrotungsten, and tungsten oxides for direct sales or further processed into W-containing products (such as W powder or W-carbide powder).
- **Dodd-Frank :** 2010 United States legislation, Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502 (“Dodd-Frank”)

5. Description

Hypertechnologie Ciara has implemented its responsible sourcing conflict mineral program and it is described as follows:

Step 1: Conflict Minerals Program – Best practices embedded to management systems or Internal Control features.

- **Conflict Minerals Policy / Code for Responsible Sourcing:** Hypertechnologie Ciara is committed to use raw materials of legal and sustainable origin and not to source 'conflict minerals' contributing to finance armed conflicts and enable human rights abuses. Hypertechnologie Ciara maintains due diligence processes to achieve compliance with this commitment and requests relevant suppliers to fully support Hypertechnologie Ciara in this effort. Hypertechnologie Ciara discloses its Procurement Policy: Responsibly Sourced Minerals Policy and Code of Conduct: Responsible Business Alliance Code of Conduct. Section D-7. Responsible Sourcing Mineral in its website <https://hypertec.com/sustainability/>
- **Governance:** The QA & Sustainability department is in charge of the creation and implementation of its conflict mineral program. This initiative is supported by Legal, Sales & Marketing and R&D departments. The QA & Sustainability Department collaborates closely with the buyers in order to properly assess the supply chain risks and is also in charge of answering customer requests regarding conflict minerals in products sold by Hypertechnologie Ciara.
- **System of controls and transparency (Traceability):** The Conflict Minerals Reporting Template (CMRT) issued by RMI has been chosen by Hypertechnologie Ciara to facilitate the transfer of information throughout its supply chain and provide control and transparency over the conflict minerals country of origin and the smelters and refiners (SOR(s)) involved. The CMRTs are filled out by the relevant suppliers and is the starting point of the traceability process.
- **Engagement with relevant suppliers:** Hypertechnologie Ciara enforces its commitment to supporting and implementing its conflict minerals program through the relevant section in the Code for Responsible Sourcing. The Code for Responsible Sourcing is sent to the relevant suppliers. The acknowledgement of the Code for Responsible Sourcing or the reference to an equivalent responsible sourcing program is also stored in our system.
- **Grievance Mechanism:** Through our Social Accountability Management System, Hypertechnologie Ciara establish the grievance mechanism within its supply chain under the procedure PR_HYP_HRO23_SA8000. The document also covers processes used to address these grievances. For grievances related to smelter and refiner operations that fall in the scope of the Responsible Minerals Assurance Process (RMAP), RMI has created Minerals Grievance Platform (MGP). <https://www.responsiblemineralsinitiative.org/rmap/grievance-mechanism/>

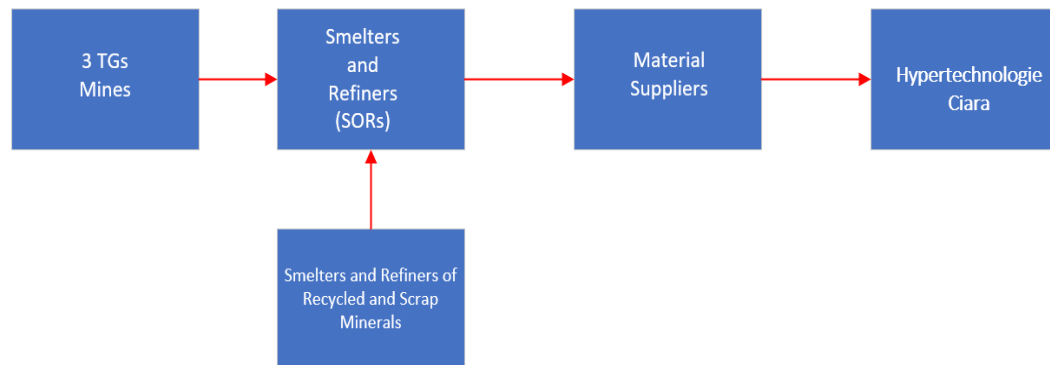
Step 2 – Identify and Assess Risk in the Supply Chain

- Identification of suppliers by defining the relevant products in the scope of conflict minerals program in the whole product portfolio corresponding to 3TGs (Gold, Tin, Tungsten and Tantalum). The identified relevant suppliers belong to our material category such as microelectronic and/or materials manufacturers (components and parts). Relevant actors of the purpose of this report such as smelters and refiners which are sourced by the 3TGs Mines. Moreover, smelters and refiners of the recycled and scrap minerals are also identified but are not part of the due diligence process as they do not meet the

definition of a smelter and refiners according to the applicable RMAP standard.

<https://www.responsiblemineralsinitiative.org/minerals-due-diligence/standards/>

Hypertechnologie Ciara Conflict Minerals Supply Chain



- **Request information from relevant suppliers by** using the CMRT to collect yearly the names of the SOR(s) from the identified suppliers which is the conflict mineral reporting template that facilitates the transfer of information through the supply chain regarding mineral country of origin and the smelters and refiners being utilized. The template also facilitates the identification of new smelters and refiners to potentially undergo an audit via the RMI’s Responsible Minerals Assurance Process (RMAP). Prior to a new vendor being approved, it will be asked to supply a CMRT. If an incomplete or unsatisfactory response is provided, the potential vendor will be disqualified.

- **Use the Reasonable Country of Origin Inquiry Data (RCOI)** provided by the responsible minerals’ initiatives. This list provides country of origin information for the mined material of conformant smelters and refiners in the RMAP and gold refiners that have successfully completed a cross-recognized assessment through the London Bullion Market Association (LBMA) or Responsible Jewelry Council (RJC). RCOI data is released by the RMI on a bimonthly basis.

- **Compare SOR(s) identified by the supply chain to assess possible risks:** The QA & Sustainability department compares the names of the SOR(s) listed in the CMRTs against the CFSI (Conflict-Free Smelter Initiative) Conflict-Free Smelter Program list from RMI through the Facility Data Base platform. <https://www.responsiblemineralsinitiative.org/facility-links/facility-database/>. Moreover, the QA & Sustainability department re-visit the smelter status every 6 months in order to re-assess the smelter status by consulting the RMI facility data base platform to update the audit dates in the established period.

Step 3 – Risk Management

- Establishing the Red flag triggers by SORs through the requirement of our direct suppliers. This process is evaluated through the RMAP audits by RMI. The following red flags trigger further due diligence to be conducted by SORs:
 - Unidentified smelters
 - The minerals originate from or have been transported via a conflict-affected or high-risk area.
 - The minerals are claimed to originate from a country that has limited known reserves, likely resources or expected production levels of the mineral in question.
 - The minerals are claimed to originate from a country in which minerals from conflict-affected and high-risk areas are known to transit.
 - The company's suppliers or other known upstream companies have shareholders or other interests in companies that supply minerals from or operate in the above-mentioned red flag locations of mineral origin and transit.
 - The company's suppliers or other known upstream companies are known to have sourced minerals from a red flag location of mineral origin or transit in the last 12 months.

- **Due diligence review** : since **Hypertechnologie Ciara** is not directly in contact with SORs the QA & sustainability department is performing a documentation-based review as follows:
 - Independent assessment or validation schemes such RMAP, and cross-recognized upstream mechanism established by RMI.
 - Statements or other assertions of SOR(s) such as public commitments about their policies, initiatives, certifications and accredited members of industry associations.
 - Indirect information (such a smelter location, metal association reports, independent reports, UN reports etc.)

- Regarding the responsible sourcing conflict mineral program on the third-party assessments of smelters and refiners executing by RMI through the RMAP, we take into account the audit cycle period and the eligibility of the smelter and refiner. Therefore, we follow the eligibility status stated by RMI which consist of conformant and active status. Active status means that smelters and refiners which have committed to undergo an RMAP assessment, completed the relevant documents, and scheduled the on-site assessment. These may be in the pre-assessment, assessment, or corrective-action phases of the assessment. The audit cycle is based in 1 Year – Standard assessment period for RMAP smelters and 3 Years – Assessment period for smelters in a Risk-Based Audit Program and TI-CMC (Tungsten Industry – Conflict Mineral Council) members. The conformant list includes the names, locations and links to supply chain policies of all refiners that are conformant with the relevant RMAP Standards. This includes gold refiners that have successfully completed a cross-recognized assessment with either the London Bullion Market Association (LBMA) or Responsible Jewelry Council (RJC). The definition of compliant is that the SOR are enrolled to the RMI conflict mineral program.

SOR status under RMI	Description
Conformant	Smelters and refiners that are conformant with the relevant RMAP Standards and have successfully completed a cross-recognized assessment in case of gold SORs.
Active	Smelters and refiners which have committed to undergo an RMAP assessment, completed the relevant documents, and scheduled the on-site assessment. These may be in the pre-assessment, assessment, or corrective-action phases of the assessment.
Non-conformant	Smelters and refiners that are not conformant with the relevant RMAP Standards.

- **By having this previous mineral supply chain structure, Hypertechnologie Ciara** is able to determine the risk of Smelter and Refiners by categorizing them in low, medium and high risk. The low-risk smelters and refiners are the ones that are categorized Conformant and Compliant by RMI based on the RMAP audit report, not classified high-risk location and no findings founded. The medium-risk smelter and refiners are the ones that are categorized compliant, active, not classified high-risk location, findings founded or Not members of RMI, but are members of LBMA and RJC. The high-risk of smelters and refiners is defining by its geographic risk as high-risk location and RMAP status non-conformant and non-compliant and findings founded. We use the [RMI's Global Risk Map](#) provided by RMI to its members. Moreover, Russia is considered a high-risk country determined by **the Good Delivery Current List Gold** due to the political instability that impacts the human rights, governance and conflict area. We also identified the country of origin mineral sourcing to the SORs under the definition **according to the RMI RMAP Standard, the CAHRAs shall include, at a minimum, countries identified as high-risk by relevant conflict minerals regulation, such as:** The Democratic Republic of the Congo (DRC) and its nine adjoining countries as outlined in Section 1502 of the Dodd Frank Act, namely Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia; and, the indicative and non-exhaustive list of CAHRAs provided by the European Commission pursuant to Article 14.2 of the European Union Regulation 2017/821.

Risk Level of SOR	Description
Low-Risk	Conformant, Compliant, not classified high-risk location, no findings. Re-assessment or Re-audit status "Yes" and/or cross-recognized assessment "Yes" status.
Medium-Risk	Compliant, Active, not classified high-risk location, no findings or Not members of RMI but are members of LBMA and RJC.
High-Risk	Not Compliant, Non-Conformant, classified high-risk location, findings, not cross-recognition assessment and not members of LBMA and RJC.

- Actions to be taken: Creating a list to monitor the status of the SOR(s) annually. This monitoring list is called “**SORs Responsible Sourcing Compliance Monitoring List**” . If SOR(s) cannot be identified or if any other red flag - as described above - is triggered, **Hypertechnologie Ciara** will require relevant suppliers to encourage sourcing directly from a SOR that participate in an independent validation scheme such as RMI and its recognized upstream mechanisms. In addition to that, communicate our direct supplier to encourage SORs to enroll to the RMI.

Step 4 – Smelters or Refiners (Third-party due diligence)

- As this step is related to the third-party due diligence of SORs by RMI managing by our direct supplier, **Hypertechnologie Ciara only monitors** and give guidelines or instructions through our mineral sourcing policy to our suppliers.
- **Hypertechnologie Ciara** has been a member of Responsible Business Alliance (RBA) since 2020. Being a member of RBA allows us to be part of the Responsible Minerals Initiative (RMI) which is in compliance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas in the Democratic Republic of the Congo (DRC) and the Great Lakes Region (GLR) of Central Africa.
<https://www.responsiblemineralsinitiative.org/membership/>.
- Being a proactive member, we can contribute to a range of tools and resources, including the Responsible Minerals Assurance Process <RMAP> (3TG and cobalt), Risk Readiness Assessment (RRA), Minerals Reporting Templates (3TG and cobalt), industry-wide grievance mechanism, Reasonable Country of Origin Inquiry data (RCOI), RMI Learning Academy, public global smelter/refiner lists, and a range of practical guidance documents for industry.
- **Hypertechnologie Ciara** does not have direct business relationship with SOR(s) . To support an independent audit approach and minimize the risks of sourcing from illegal and risky sources, **Hypertechnologie Ciara** shares the following instructions with all its existing suppliers:
 - Suppliers must map their supply chain back to the mines the SOR(s) extract the minerals from. This must be reported on a yearly basis by completing the Conflict Minerals Reporting Template (CMRT) to identify the SOR(s) and the country of origin of the conflict minerals. This report must include complete information regarding all SOR(s) under the scope. Any changes affecting the information disclosed in the CMRT within the yearly reporting period must be promptly reported to **Hypertechnologie Ciara**;
 - Suppliers must only source conflict minerals from SOR(s) that have been passed successfully the RMAP audits being “conflict-free” compliant by RMI.
 - Suppliers must not use any products that would not come from these conformant or active SOR(s);
 - Documentary evidence of the audit must be provided when requested or it is required directly to the RMI as member of RBA.
 - If suppliers become aware that they may have sourced conflict minerals from any Covered Countries or that the minerals may have directly or indirectly financed or benefited armed

groups, the suppliers must immediately notify **Hypertechnologie Ciara** in writing; the concerned buyer must also be copied. Notifications must include reasonable tracking information to identify which goods may have been affected; and

- Suppliers must promptly notify **Hypertechnologie Ciara** of all failures to meet the reporting, sourcing and due diligence requirements.

Step 5 – Reporting

- **Hypertechnologie Ciara** annually discloses the results of its supply chain due diligence on its corporate web page with a focus on conflict minerals. In this disclosure, Hypertechnologie Ciara reports the results of its RCOI that is complemented with the SOR level risk, public commitments links and the public RMAP audit link from RMI website. In sum, “Conflict Mineral Disclosure Report” is publicly available on **Hypertechnologie Ciara** website. This report demonstrates that $\geq 90\%$ of the number of smelters and refiners of all conflict minerals are conformant status.
- Smelters and Refiners of Recycled or scrap mineral are excluded on the calculation of Smelters and Refiners under this process and the annually Conflict Mineral Disclosure report as they belong to the Downstream Assessment Program.

6. Conclusions

- Hypertechnologie Ciara is committed to actively participate in the RMI working groups as small medium enterprise in the technology industry.
- Being a member of RBA and RMI allows **Hypertechnologie Ciara** to access to the Reasonable Country of Origin Inquiry Data (RCOI) and RMAP audits report to execute its due diligence process. In addition to that, encourage direct suppliers and sub-tier suppliers (SORs) to enroll to RMI’s program and utilize the due diligence resources and tools.
- **Hypertechnologie Ciara** due diligence process is based on a documentary review supported by the RCOI, the RMAP third-party audit report and public commitments of each smelter and refiner that belongs to its mineral supply chain.
- **Hypertechnologie Ciara** due diligence process is tracking by the SORs Responsible Sourcing Compliance Monitoring List. The structured data allows **Hypertechnologie Ciara** to determine the risk of the SORs based on a documentary review.
- Smelters and Refiners of Recycled or scrap mineral are excluded on the calculation of Smelters and Refiners under this procedure as they belong to the Downstream Assessment Program.

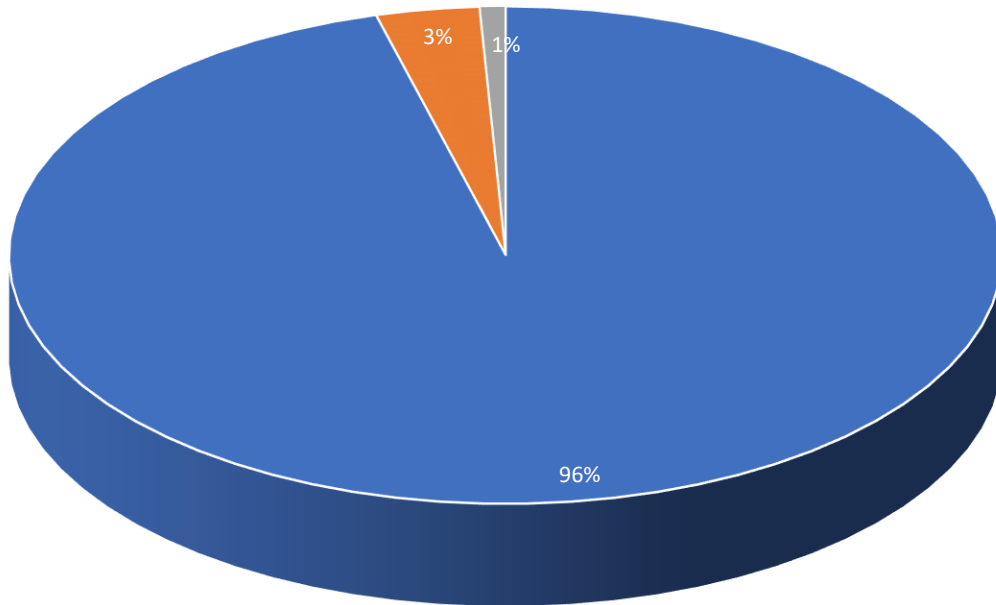
7. Smelter and Refiner Due Diligence Results

- **Hypertechnologie Ciara** has identified 238 Smelters and Refiners in its supply chain, where 228 are conformant status and eight are active status and two non-conformant status but are members of LBMA and RJC.
- **Hypertechnologie Ciara** has determined that 96% of the number of smelters and refiners of all conflict minerals in its supply chain are conformant status.

8. Summary of Smelter and Refiner Status

Status of Identified Smelters and Refiners

■ Conformant ■ Active ■ Non-conformant



List of Smelters and Refiners

Smelter CID	Metal	Smelter Name	Smelter Status
CID000004	Tungsten	A.L.M.T. Corp.	Conformant
CID000015	Gold	Advanced Chemical Company	Conformant
CID000019	Gold	Aida Chemical Industries Co., Ltd.	Conformant
CID000035	Gold	Agosi AG	Conformant
CID000041	Gold	Almalyk Mining and Metallurgical Complex (AMMC)	Conformant
CID000058	Gold	AngloGold Ashanti Corrego do Sitio Mineracao	Conformant
CID000077	Gold	Argor-Heraeus S.A.	Conformant
CID000082	Gold	Asahi Pretec Corp.	Conformant
CID000090	Gold	Asaka Riken Co., Ltd.	Conformant
CID000105	Tungsten	Kennametal Huntsville	Conformant
CID000113	Gold	Aurubis AG	Conformant
CID000128	Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	Conformant
CID000157	Gold	Boliden AB	Conformant
CID000176	Gold	C. Hafner GmbH + Co. KG	Conformant
CID000185	Gold	CCR Refinery - Glencore Canada Corporation	Conformant

CID000189	Gold	Cendres + Metaux S.A.	Non conformant
CID000211	Tantalum	Changsha South Tantalum Niobium Co., Ltd.	Conformant
CID000218	Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	Conformant
CID000228	Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	Conformant
CID000233	Gold	Chimet S.p.A.	Conformant
CID000258	Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	Conformant
CID000264	Gold	Chugai Mining	Conformant
CID000292	Tin	Alpha	Conformant
CID000309	Tin	PT Aries Kencana Sejahtera	Conformant
CID000359	Gold	DSC (Do Sung Corporation)	Conformant
CID000401	Gold	Dowa	Conformant
CID000402	Tin	Dowa	Conformant
CID000425	Gold	Eco-System Recycling Co., Ltd. East Plant	Conformant
CID000438	Tin	EM Vinto	Conformant
CID000448	Tin	Estanho de Rondonia S.A.	Conformant
CID000460	Tantalum	F&X Electro-Materials Ltd.	Conformant
CID000468	Tin	Fenix Metals	Conformant

CID000538	Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	Conformant
CID000568	Tungsten	Global Tungsten & Powders Corp.	Conformant
CID000616	Tantalum	XIMEI RESOURCES (GUANGDONG) LIMITED	Conformant
CID000689	Gold	LT Metal Ltd.	Conformant
CID000694	Gold	Heimerle + Meule GmbH	Conformant
CID000707	Gold	Heraeus Metals Hong Kong Ltd.	Conformant
CID000711	Gold	Heraeus Germany GmbH Co. KG	Conformant
CID000766	Tungsten	Hunan Chenzhou Mining Co., Ltd.	Conformant
CID000769	Tungsten	Hunan Jintai New Material Co., Ltd.	Conformant
CID000801	Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	Conformant
CID000807	Gold	Ishifuku Metal Industry Co., Ltd.	Conformant
CID000814	Gold	Istanbul Gold Refinery	Conformant
CID000823	Gold	Japan Mint	Conformant
CID000825	Tungsten	Japan New Metals Co., Ltd.	Conformant
CID000855	Gold	Jiangxi Copper Co., Ltd.	Conformant
CID000875	Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	Conformant
CID000914	Tantalum	Jiujiang JinXin Nonferrous Metals Co., Ltd.	Conformant

CID000917	Tantalum	Jiujiang Tanbre Co., Ltd.	Conformant
CID000920	Gold	Asahi Refining USA Inc.	Conformant
CID000924	Gold	Asahi Refining Canada Ltd.	Conformant
CID000937	Gold	JX Nippon Mining & Metals Co., Ltd.	Conformant
CID000957	Gold	Kazzinc	Conformant
CID000966	Tungsten	Kennametal Fallon	Conformant
CID000969	Gold	Kennecott Utah Copper LLC	Conformant
CID000981	Gold	Kojima Chemicals Co., Ltd.	Conformant
CID001029	Gold	Kyrgyzaltyn JSC	Conformant
CID001070	Tin	China Tin Group Co., Ltd.	Conformant
CID001076	Tantalum	AMG Brasil	Conformant
CID001078	Gold	LS-NIKKO Copper Inc.	Conformant
CID001105	Tin	Malaysia Smelting Corporation (MSC)	Conformant
CID001113	Gold	Materion	Conformant
CID001119	Gold	Matsuda Sangyo Co., Ltd.	Conformant
CID001142	Tin	Metallic Resources, Inc.	Conformant
CID001147	Gold	Metalor Technologies (Suzhou) Ltd.	Conformant

CID001149	Gold	Metalor Technologies (Hong Kong) Ltd.	Conformant
CID001152	Gold	Metalor Technologies (Singapore) Pte., Ltd.	Conformant
CID001153	Gold	Metalor Technologies S.A.	Conformant
CID001157	Gold	Metalor USA Refining Corporation	Conformant
CID001161	Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	Conformant
CID001163	Tantalum	Metallurgical Products India Pvt., Ltd.	Conformant
CID001173	Tin	Mineracao Taboca S.A.	Conformant
CID001175	Tantalum	Mineracao Taboca S.A.	Conformant
CID001182	Tin	Minsur	Conformant
CID001188	Gold	Mitsubishi Materials Corporation	Conformant
CID001191	Tin	Mitsubishi Materials Corporation	Conformant
CID001192	Tantalum	Mitsui Mining and Smelting Co., Ltd.	Conformant
CID001193	Gold	Mitsui Mining and Smelting Co., Ltd.	Conformant
CID001200	Tantalum	NPM Silmet AS	Conformant
CID001220	Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	Conformant
CID001231	Tin	Jiangxi New Nanshan Technology Ltd.	Conformant
CID001236	Gold	Navoi Mining and Metallurgical Combinat	Conformant

CID001259	Gold	Nihon Material Co., Ltd.	Conformant
CID001277	Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	Conformant
CID001314	Tin	O.M. Manufacturing (Thailand) Co., Ltd.	Conformant
CID001325	Gold	Ohura Precious Metal Industry Co., Ltd.	Conformant
CID001337	Tin	Operaciones Metalurgicas S.A.	Conformant
CID001352	Gold	MKS PAMP SA	Conformant
CID001397	Gold	PT Aneka Tambang (Persero) Tbk	Conformant
CID001399	Tin	PT Artha Cipta Langgeng	Conformant
CID001402	Tin	PT Babel Inti Perkasa	Conformant
CID001406	Tin	PT Babel Surya Alam Lestari	Conformant
CID001428	Tin	PT Bukit Timah	Conformant
CID001453	Tin	PT Mitra Stania Prima	Conformant
CID001458	Tin	PT Prima Timah Utama	Conformant
CID001460	Tin	PT Refined Bangka Tin	Conformant
CID001463	Tin	PT Sariwiguna Binasentosa	Conformant
CID001468	Tin	PT Stanindo Inti Perkasa	Conformant
CID001477	Tin	PT Timah Tbk Kundur	Conformant

CID001482	Tin	PT Timah Tbk Mentok	Conformant
CID001486	Tin	PT Timah Nusantara	Active
CID001493	Tin	PT Tommy Utama	Conformant
CID001498	Gold	PX Precinox S.A.	Conformant
CID001508	Tantalum	QuantumClean	Conformant
CID001512	Gold	Rand Refinery (Pty) Ltd.	Conformant
CID001522	Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	Conformant
CID001534	Gold	Royal Canadian Mint	Conformant
CID001539	Tin	Rui Da Hung	Conformant
CID001555	Gold	Samduck Precious Metals	Conformant
CID001585	Gold	SEMPSA Joyeria Plateria S.A.	Conformant
CID001622	Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	Conformant
CID001736	Gold	Sichuan Tianze Precious Metals Co., Ltd.	Conformant
CID001761	Gold	Solar Applied Materials Technology Corp.	Conformant
CID001798	Gold	Sumitomo Metal Mining Co., Ltd.	Conformant
CID001869	Tantalum	Taki Chemical Co., Ltd.	Conformant
CID001875	Gold	Tanaka Kikinzoku Kogyo K.K.	Conformant

CID001891	Tantalum	Telex Metals	Conformant
CID001898	Tin	Thaisarco	Conformant
CID001916	Gold	Shandong Gold Smelting Co., Ltd.	Conformant
CID001938	Gold	Tokuriki Honten Co., Ltd.	Conformant
CID001955	Gold	Torecom	Conformant
CID001969	Tantalum	Ulba Metallurgical Plant JSC	Conformant
CID001980	Gold	Umicore S.A. Business Unit Precious Metals Refining	Conformant
CID001993	Gold	United Precious Metal Refining, Inc.	Conformant
CID002003	Gold	Valcambi S.A.	Conformant
CID002030	Gold	Western Australian Mint (T/a The Perth Mint)	Conformant
CID002036	Tin	White Solder Metalurgia e Mineracao Ltda.	Conformant
CID002044	Tungsten	Wolfram Bergbau und Hutten AG	Conformant
CID002082	Tungsten	Xiamen Tungsten Co., Ltd.	Conformant
CID002100	Gold	Yamakin Co., Ltd.	Conformant
CID002129	Gold	Yokohama Metal Co., Ltd.	Conformant
CID002158	Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	Conformant
CID002180	Tin	Tin Smelting Branch of Yunnan Tin Co., Ltd.	Conformant

CID002224	Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	Conformant
CID002243	Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	Conformant
CID002290	Gold	SAFINA A.S.	Conformant
CID002314	Gold	Umicore Precious Metals Thailand	Conformant
CID002315	Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	Conformant
CID002316	Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	Conformant
CID002317	Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	Conformant
CID002318	Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	Conformant
CID002319	Tungsten	Malipo Haiyu Tungsten Co., Ltd.	Conformant
CID002320	Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	Conformant
CID002321	Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	Conformant
CID002455	Tin	CV Venus Inti Perkasa	Conformant
CID002459	Gold	Geib Refining Corporation	Conformant
CID002468	Tin	Magnu's Minerais Metais e Ligas Ltda.	Conformant
CID002492	Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	Conformant
CID002494	Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	Conformant
CID002502	Tungsten	Asia Tungsten Products Vietnam Ltd.	Conformant

CID002503	Tin	PT ATD Makmur Mandiri Jaya	Conformant
CID002504	Tantalum	D Block Metals, LLC	Conformant
CID002505	Tantalum	FIR Metals & Resource Ltd.	Conformant
CID002506	Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	Conformant
CID002508	Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	Conformant
CID002509	Gold	MMTC-PAMP India Pvt., Ltd.	Conformant
CID002511	Gold	KGHM Polska Miedz Spolka Akcyjna	Conformant
CID002512	Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	Conformant
CID002513	Tungsten	Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch	Conformant
CID002517	Tin	O.M. Manufacturing Philippines, Inc.	Conformant
CID002539	Tantalum	KEMET de Mexico	Conformant
CID002541	Tungsten	H.C. Starck Tungsten GmbH	Conformant
CID002542	Tungsten	TANIOBIS Smelting GmbH & Co. KG	Conformant
CID002543	Tungsten	Masan High-Tech Materials	Conformant
CID002544	Tantalum	TANIOBIS Co., Ltd.	Conformant
CID002545	Tantalum	TANIOBIS GmbH	Conformant
CID002547	Tantalum	QSIL Metals Hermsdorf GmbH	Conformant

CID002548	Tantalum	Materion Newton Inc.	Conformant
CID002549	Tantalum	TANIOBIS Japan Co., Ltd.	Conformant
CID002551	Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	Conformant
CID002557	Tantalum	Global Advanced Metals Boyertown	Conformant
CID002558	Tantalum	Global Advanced Metals Aizu	Conformant
CID002560	Gold	Al Etihad Gold Refinery DMCC	Conformant
CID002561	Gold	Emirates Gold DMCC	Conformant
CID002580	Gold	T.C.A S.p.A	Conformant
CID002582	Gold	REMONDIS PMR B.V.	Conformant
CID002589	Tungsten	Niagara Refining LLC	Conformant
CID002605	Gold	Korea Zinc Co., Ltd.	Conformant
CID002615	Gold	TOO Tau-Ken-Altyn	Conformant
CID002641	Tungsten	China Molybdenum Tungsten Co., Ltd.	Conformant
CID002645	Tungsten	Ganzhou Haichuang Tungsten Co., Ltd.	Conformant
CID002696	Tin	PT Cipta Persada Mulia	Conformant
CID002706	Tin	Resind Industria e Comercio Ltda.	Conformant
CID002707	Tantalum	Resind Industria e Comercio Ltda.	Conformant

CID002708	Gold	Abington Reldan Metals, LLC	Conformant
CID002756	Tin	Super Ligas	Active
CID002761	Gold	SAAMP	Conformant
CID002762	Gold	L'Orfebre S.A.	Conformant
CID002765	Gold	Italpreziosi	Conformant
CID002773	Tin	Aurubis Beerse	Conformant
CID002774	Tin	Aurubis Berango	Conformant
CID002778	Gold	WIELAND Edelmetalle GmbH	Conformant
CID002779	Gold	Ogussa Osterreichische Gold- und Silber- Scheideanstalt GmbH	Conformant
CID002816	Tin	PT Sukses Inti Makmur	Conformant
CID002827	Tungsten	Philippine Chuangxin Industrial Co., Inc.	Conformant
CID002830	Tungsten	Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.	Conformant
CID002834	Tin	Thai Nguyen Mining and Metallurgy Co., Ltd.	Conformant
CID002835	Tin	PT Menara Cipta Mulia	Conformant
CID002842	Tantalum	Jiangxi Tuohong New Raw Material	Conformant
CID002844	Tin	HuiChang Hill Tin Industry Co., Ltd.	Conformant
CID002852	Gold	GGC Gujrat Gold Centre Pvt. Ltd.	Active

CID002863	Gold	Bangalore Refinery	Conformant
CID002918	Gold	SungEel HiMetal Co., Ltd.	Conformant
CID002919	Gold	Planta Recuperadora de Metales SpA	Conformant
CID002973	Gold	Safimet S.p.A	Non conformant
CID003116	Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	Conformant
CID003189	Gold	NH Recytech Company	Conformant
CID003190	Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	Conformant
CID003205	Tin	PT Bangka Serumpun	Conformant
CID003325	Tin	Tin Technology & Refining	Conformant
CID003379	Tin	Ma'anshan Weitai Tin Co., Ltd.	Conformant
CID003381	Tin	PT Rajawali Rimba Perkasa	Conformant
CID003387	Tin	Luna Smelter, Ltd.	Conformant
CID003388	Tungsten	KGETS Co., Ltd.	Conformant
CID003401	Tungsten	Fujian Ganmin RareMetal Co., Ltd.	Conformant
CID003407	Tungsten	Lianyou Metals Co., Ltd.	Conformant
CID003417	Tungsten	Hubei Green Tungsten Co., Ltd.	Conformant
CID003421	Gold	C.I Metales Procesados Industriales SAS	Active

CID003424	Gold	Eco-System Recycling Co., Ltd. North Plant	Conformant
CID003425	Gold	Eco-System Recycling Co., Ltd. West Plant	Conformant
CID003449	Tin	PT Mitra Sukses Globalindo	Conformant
CID003461	Gold	Augmont Enterprises Private Limited	Active
CID003468	Tungsten	Cronimet Brasil Ltda	Conformant
CID003486	Tin	CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda	Conformant
CID003500	Gold	Alexy Metals	Active
CID003524	Tin	CRM Synergies	Conformant
CID003529	Gold	Sancus ZFS (L'Orfebre, SA) *	Active
CID003575	Gold	Metal Concentrators SA (Pty) Ltd.	Conformant
CID003582	Tin	Fabrica Auricchio Industria e Comercio Ltda.	Conformant
CID003583	Tantalum	RFH Yancheng Jinye New Material Technology Co., Ltd.	Conformant
CID003609	Tungsten	Fujian Xinlu Tungsten Co., Ltd.	Conformant
CID003615	Gold	WEEEREFINING	Active
CID003868	Tin	PT Putera Sarana Shakti (PT PSS)	Conformant
CID003993	Tungsten	Tungsten Vietnam Joint Stock Company	Conformant
CID000313	Tin	PT Premium Tin Indonesia	Conformant

CID002570	Tin	CV Ayi Jaya	Conformant
CID002593	Tin	PT Rajehan Ariq	Conformant