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

FORM SD

Specialized Disclosure Report

AVERY DENNISON CORPORATION

(Exact name of registrant as specified in its charter)

Delaware
(State or other jurisdiction of
incorporation or organization)

1-7685
(Commission
File Number)

95-1492269
(IRSEmployer
Identification No.)

207 Goode Avenue, Glendale, California
(Address of principal executive offices)

91203
(Zip Code)

Vikas Arora, (626) 304-2000
(Name and telephone number, including area code, of the
person to contact in connection with this report.)

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2020.

Section 1 — Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

Avery Dennison Corporation (the “Company”) is filing this Specialized Disclosure Report (Form SD), including the Conflict Minerals Report attached as Exhibit 1.01 hereto, for the calendar year ended December 31, 2020 to comply with Rule 13p-1 of the Securities Exchange Act of 1934, as amended. Both reports have been posted and are publicly available on the Company’s website at www.averydennison.com/conflictminerals. Information on the Company’s website is not and should not be considered part of, nor is it incorporated by reference into, this Form SD.

Item 1.02 Exhibit

The Company’s Conflict Minerals Report for calendar year 2020 is filed as Exhibit 1.01 of this report and is incorporated herein by reference.

Section 2 — Exhibits

| <u>Exhibit No.</u> | <u>Description</u> |
|---------------------------|--|
| 1.01 | Conflict Minerals Report of Avery Dennison Corporation, as required by Items 1.01 and 1.02 of this Form. |

SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

AVERY DENNISON CORPORATION

Date: May 28, 2021

By: /s/ Ignacio J. Walker
Name: Ignacio J. Walker
Title: Vice President and Chief Legal Officer

Conflict Minerals Report of Avery Dennison Corporation

Overview

This Conflict Minerals Report of Avery Dennison Corporation (the “Company,” “we,” or “us”) for calendar year 2020 was prepared in accordance with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Section 1502”) and Rule 13p-1 under the Securities Exchange Act of 1934, as amended (“Rule 13p-1”), which require that public companies perform certain procedures and disclose certain information about their use and the origin of “conflict minerals” deemed necessary to the functionality or production of a product they manufacture or contract to be manufactured and which were in their supply chain after January 31, 2013 (referred to in this report as “necessary conflict minerals”). Conflict minerals are defined as columbite-tantalite, cassiterite, gold, wolframite, or their derivatives, which include tantalum, tin and tungsten (collectively referred to as the “3TGs”).

Our businesses produce pressure-sensitive materials and a variety of tickets, tags, labels and other converted products. We sell most of our pressure-sensitive materials to label printers and converters that convert the materials into labels and other products through embossing, printing, stamping and die-cutting. We sell other pressure-sensitive materials in converted form as tapes and reflective sheeting. We also manufacture and sell a variety of other converted products and items not involving pressure-sensitive components, such as fasteners, tickets, tags, radio-frequency identification inlays and tags, and imprinting equipment and related solutions, which serve the apparel and other end markets.

Forward-looking Statements

This Conflict Minerals Report contains “forward-looking statements” within the meaning of the Private Securities Litigation Reform Act of 1995. These statements, which are not statements of historical fact, contain estimates, assumptions, and/or expectations regarding future events, which may or may not occur. These forward-looking statements are subject to certain risks and uncertainties, which could cause actual events to differ materially from the expectations expressed or implied by such forward-looking statements. These forward-looking statements are made only as of the date hereof and we assume no duty to update them to reflect new, changed or unanticipated events or circumstances, other than as may be required by law.

Assessment and Reasonable Country of Origin Inquiry

As a result of our assessment and in consultation with our external advisors, we have concluded in good faith that, during 2020, conflict minerals were necessary to the functionality or production of a substantial minority of products we manufacture or contract to manufacture, the components for which we source from a global supply base.

In accordance with Section 1502 and Rule 13p-1, we performed a “reasonable country of origin inquiry” (RCOI) on necessary conflict minerals to determine whether they were sourced from the Democratic Republic of Congo or adjoining countries (the “Covered Countries”) or come from recycled or scrap sources. We engaged Resources Global Professionals, an independent global professional services firm, to provide us advice and assistance with strategy development, due diligence methodology and reporting.

Due Diligence and Next Steps

In accordance with Rule 13p-1, for the 2020 reporting year, we performed due diligence procedures from March 17, 2021 through May 7, 2021 to determine the source and chain of custody of necessary conflict minerals in our products. We designed our due diligence procedures to conform in all material respects with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Third Edition (OECD 2016) (“OECD Guidance”) and related supplements thereto. This process included surveying all direct material suppliers believed to have provided components containing conflict minerals.

We occupy a downstream position in the supply chain and followed the principles outlined in the OECD Guidance for companies with no direct relationships to smelters or refiners. Our due diligence activities — and, where applicable, next steps to mitigate conflict minerals risk and improve our due diligence procedures — consistent with the OECD Guidance are described below.

Step 1: Establish strong company management systems

- We maintain a policy publicly available on our website at www.averydennison.com/conflictminerals that reflects our goal to refrain from purchasing components containing conflict minerals from the Covered Countries, unless those materials are certified by an independent third party to originate from conflict-free/conformant sources.
- Our governance model to oversee the implementation and ongoing management of our conflict minerals compliance program includes a steering committee performing oversight and ensuring regulatory compliance and a core team responsible for product assessment and the RCOI process. The steering committee engages with senior leadership from our business units and corporate functions to develop, document and maintain a governance structure that enables sustainable compliance and satisfies regulatory requirements.
- We maintain processes to evaluate parts and suppliers in the supply chain for potential conflict minerals risk. Our global supplier standards and restricted substances lists are updated as needed to ensure that suppliers provide information on their use and sourcing of conflict minerals. We periodically engage with industry associations to help enhance transparency and traceability in the supply chain. We use a standardized documentation format to capture key program decisions, processes, and procedures and we maintain conflict minerals records for ten years under our document retention policy.
- We have advised suppliers of our conflict minerals policy, have updated our supplier requirements to expressly incorporate the policy, and provided at-risk suppliers with additional information to facilitate their understanding and ensure our compliance with Section 1502 and Rule 13p-1.
- We maintain a telephone and web-based whistleblower hotline available at all hours for employees or third parties to report compliance concerns to our company, anonymously if they so choose. This hotline is operated by an independent third party and accepts reports in any language to accommodate the needs of our global workforce and customer/supplier base. Parties may use this existing system to provide information or voice their concerns regarding our sourcing and use of conflict minerals. The hotline may be reached by (i) calling 800.461.9330 toll-free in the United States, 720.514.4400 direct with applicable charges from any location, or toll-free outside of the United States using the country-specific toll-free numbers found in our Code of Conduct (accessible at averydennisonvaluesandethics.com) or (ii) visiting averydennison.com/guidelinereport (averydennison.com/guidelinereport-eu in Europe).

Step 2: Identify and assess risks in the supply chain

- We analyzed components of products for necessary conflict minerals and assessed the risks they contain conflict minerals from the Covered Countries.
- We required identified suppliers to complete a survey based on the Responsible Minerals Initiative (“RMI”) Conflict Minerals Reporting Template (“CMRT”).
- We reviewed the responses received and followed up with suppliers that did not return a completed survey. We reviewed survey responses and validated them for completeness and sufficiency. Based on this review, each survey was assigned a conflict minerals status of Conformant, Active, Known or Unknown. Specific supplier corrective actions depend on factors such as supplier size, risk level and supplier capabilities.
- Our core conflict minerals team reviewed aggregate supplier survey responses and key reporting metrics.
- We conducted a review of summary smelter information received to determine if the smelter has been certified as Conformant, indicating the highest degree of certified compliance with RMI protocols and global sourcing standards, or presents a “red flag” as defined by the OECD Guidance. To make the determination of each smelter’s conflict status, we relied upon information provided by RMI. RMI conducts a Responsible Minerals Assurance Process under which it certifies smelters and refiners worldwide after confirming specific information, including country of origin, for conflict minerals that the smelter/refiner may purchase for its operations. RMI makes available to the public the list of smelters/refiners that it has certified as Conformant.

Step 3: Design and implement a strategy to respond to identified risks

- We conduct a gap analysis on an annual basis after completing our due diligence procedures and we review identified risks and gaps — as well as recommended action plans to mitigate risks and close gaps — with the steering committee.
- With oversight from our Board of Directors, management is responsible for managing the day-to-day risks confronting

our businesses, including enterprise risk management. In addition, we have robust global processes that support a strong internal control environment to promote the early identification and continued management of risks by our company's leadership. In this context, we routinely refine our risk mitigation strategy with the goal of systematically reducing the extent of exposure to significant identified risks and minimizing the likelihood of their occurrence. We continue to refine our risk management plan for risks associated with conflict minerals consistent with these existing processes.

- We continue to implement our conflict minerals risk management plan as we continue our due diligence procedures and obtain additional information regarding our conflict minerals risk exposure.
- Additional fact finding, risk assessments, and changes in circumstances are assessed during our annual review of our conflict minerals compliance program.

Step 4: Carry out independent third-party audit of smelter/refiner's due diligence practices

- In accordance with the OECD Guidance, we continue to build relationships with industry organizations regarding third party audits of smelter/refiner due diligence practices.

Step 5: Report annually on supply chain due diligence

- We have implemented a process annually to summarize, review, and approve conflict minerals compliance results, complete the Form Specialized Disclosure (Form SD) and Conflict Minerals Report required by Rule 13p-1, and timely file them with the Securities and Exchange Commission.

Assessment and RCOI Results for 2020

Based on the process described above, we had the following results from our initial assessment and RCOI process for the 2020 calendar year:

- Based on our current assessment, an aggregate of approximately 2,000 components used in our Retail Branding and Information Solutions and Industrial and Healthcare Materials reportable segments contain conflict minerals. These components are used in products that represented approximately 8% of our consolidated revenues for fiscal year 2020. No components used in our Label and Graphic Materials reportable segment, which represented 67% of our net sales in fiscal year 2020, were found to contain conflict minerals.
- Suppliers providing components containing necessary conflict minerals to our impacted business units were included in the RCOI process. Completed responses were received from 82% of the 78 surveyed suppliers, an increase from the 72% response rate for the 100 surveyed suppliers in 2019.
- Based on the supplier representations contained in the survey responses received through May 7, 2021, a subset of components provided to us has been determined to contain conflict minerals originating from the Covered Countries. These components primarily originated from smelters/refiners that have been certified by RMI as Conformant. However, suppliers responding to our inquiries indicated that the information provided in their responses was for their customers as a whole, rather than us in particular; as a result, we have been unable to fully determine whether our necessary conflict minerals were sourced from the Covered Countries or came from recycled or scrap sources.

The due diligence procedures described above, including our RCOI process, resulted in the following assertions for calendar year 2020:

- We have been unable to fully determine and describe the facilities used to process our necessary conflict minerals.
- Consistent with the OECD Guidance for downstream companies such as us, our efforts to determine the mine or location of origin of our necessary conflict minerals encompassed the due diligence procedures described above and have not been conclusive.
- Our supplier responses included Conformant, Active, Known, and Unknown smelters. The status of the reported smelters was 70% Conformant, 7% Active, 22% Known and 1% Unknown. To provide transparency into our supply chain and based on the information provided by the responding suppliers for 2020, we believe that the facilities that may have been used to process the 3TGs in our products include the Conformant, Active and Known smelters and refiners listed in the Appendix attached hereto.

APPENDIX – Conformant, Active and Known Smelters

| <u>Metal</u> | <u>Smelter Identification</u> | <u>Smelter Reference List</u> | <u>Smelter Location</u> | <u>RMI Verified</u> |
|--------------|-------------------------------|---|-------------------------|---------------------|
| Gold | CID000015 | Advanced Chemical Company | USA | Conformant |
| Gold | CID000019 | Aida Chemical Industries Co., Ltd. | JAPAN | Conformant |
| Gold | CID000035 | Allgemeine Gold-und Silberscheideanstalt A.G. | GERMANY | Conformant |
| Gold | CID000041 | Almalyk Mining and Metallurgical Complex (AMMC) | UZBEKISTAN | Conformant |
| Gold | CID000058 | AngloGold Ashanti Corrego do Sitio Mineracao | BRAZIL | Conformant |
| Gold | CID000077 | Argor-Heraeus S.A. | SWITZERLAND | Conformant |
| Gold | CID000082 | Asahi Pretec Corp. | JAPAN | Conformant |
| Gold | CID000090 | Asaka Riken Co., Ltd. | JAPAN | Conformant |
| Gold | CID000103 | Atasay Kuyumculuk Sanayi Ve Ticaret A.S. | TURKEY | Known |
| Gold | CID000113 | Aurubis AG | GERMANY | Conformant |
| Gold | CID000128 | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | PHILIPPINES | Conformant |
| Gold | CID000157 | Boliden AB | SWEDEN | Conformant |
| Gold | CID000176 | C. Hafner GmbH + Co. KG | GERMANY | Conformant |
| Gold | CID000180 | Caridad | MEXICO | Known |
| Gold | CID000185 | CCR Refinery - Glencore Canada Corporation | CANADA | Conformant |
| Gold | CID000189 | Cendres + Metaux S.A. | SWITZERLAND | Conformant |
| Gold | CID000197 | Yunnan Copper Industry Co., Ltd. | CHINA | Known |
| Gold | CID000233 | Chimet S.p.A. | ITALY | Conformant |
| Gold | CID000264 | Chugai Mining | JAPAN | Conformant |
| Gold | CID000343 | Daye Non-Ferrous Metals Mining Ltd. | CHINA | Known |
| Gold | CID000359 | DSC (Do Sung Corporation) | KOREA | Conformant |
| Gold | CID000362 | DODUCO Contacts and Refining GmbH | GERMANY | Conformant |
| Gold | CID000401 | Dowa | JAPAN | Conformant |
| Gold | CID000425 | Eco-System Recycling Co., Ltd. East Plant | JAPAN | Conformant |
| Gold | CID000493 | OJSC Novosibirsk Refinery | RUSSIAN FED. | Conformant |
| Gold | CID000522 | Refinery of Seemine Gold Co., Ltd. | CHINA | Known |
| Gold | CID000651 | Guoda Safina High-Tech Environmental Refinery Co., Ltd. | CHINA | Known |
| Gold | CID000671 | Hangzhou Fuchunjiang Smelting Co., Ltd. | CHINA | Known |
| Gold | CID000689 | LT Metal Ltd. | KOREA | Conformant |
| Gold | CID000694 | Heimerle + Meule GmbH | GERMANY | Conformant |
| Gold | CID000707 | Heraeus Metals Hong Kong Ltd. | CHINA | Conformant |
| Gold | CID000711 | Heraeus Precious Metals GmbH & Co. KG | GERMANY | Active |
| Gold | CID000767 | Hunan Chenzhou Mining Co., Ltd. | CHINA | Known |
| Gold | CID000773 | Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd. | CHINA | Known |
| Gold | CID000778 | HwaSeong CJ CO., LTD. | KOREA | Known |
| Gold | CID000801 | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | CHINA | Conformant |
| Gold | CID000807 | Ishifuku Metal Industry Co., Ltd. | JAPAN | Conformant |
| Gold | CID000814 | Istanbul Gold Refinery | TURKEY | Conformant |
| Gold | CID000823 | Japan Mint | JAPAN | Conformant |
| Gold | CID000855 | Jiangxi Copper Co., Ltd. | CHINA | Conformant |
| Gold | CID000920 | Asahi Refining USA Inc. | USA | Conformant |
| Gold | CID000924 | Asahi Refining Canada Ltd. | CANADA | Conformant |
| Gold | CID000927 | JSC Ekaterinburg Non-Ferrous Metal Processing Plant | RUSSIAN FED. | Known |
| Gold | CID000929 | JSC Uralelectromed | RUSSIAN FED. | Conformant |
| Gold | CID000937 | JX Nippon Mining & Metals Co., Ltd. | JAPAN | Conformant |
| Gold | CID000956 | Kazakhmys Smelting LLC | KAZAKHSTAN | Known |
| Gold | CID000957 | Kazzinc | KAZAKHSTAN | Conformant |
| Gold | CID000969 | Kennecott Utah Copper LLC | USA | Conformant |
| Gold | CID000981 | Kojima Chemicals Co., Ltd. | JAPAN | Conformant |
| Gold | CID001029 | Kyrgyzaltyn JSC | KYRGYZSTAN | Conformant |
| Gold | CID001032 | L'azurde Company For Jewelry | SAUDI ARABIA | Known |
| Gold | CID001056 | Lingbao Gold Co., Ltd. | CHINA | Known |
| Gold | CID001058 | Lingbao Jinyuan Tonghui Refinery Co., Ltd. | CHINA | Known |
| Gold | CID001078 | LS-NIKKO Copper Inc. | KOREA | Conformant |
| Gold | CID001093 | Luoyang Zijin Yinhuai Gold Refinery Co., Ltd. | CHINA | Known |
| Gold | CID001113 | Materion | USA | Conformant |
| Gold | CID001119 | Matsuda Sangyo Co., Ltd. | JAPAN | Conformant |
| Gold | CID001147 | Metalor Technologies (Suzhou) Ltd. | CHINA | Conformant |
| Gold | CID001149 | Metalor Technologies (Hong Kong) Ltd. | CHINA | Conformant |

| <u>Metal</u> | <u>Smelter Identification</u> | <u>Smelter Reference List</u> | <u>Smelter Location</u> | <u>RMI Verified</u> |
|--------------|-------------------------------|---|---------------------------|---------------------|
| Gold | CID001152 | Metalor Technologies (Singapore) Pte., Ltd. | SINGAPORE | Conformant |
| Gold | CID001153 | Metalor Technologies S.A. | SWITZERLAND | Conformant |
| Gold | CID001157 | Metalor USA Refining Corporation | USA | Conformant |
| Gold | CID001161 | Metalurgica Met-Mex Penoles S.A. De C.V. | MEXICO | Conformant |
| Gold | CID001188 | Mitsubishi Materials Corporation | JAPAN | Conformant |
| Gold | CID001193 | Mitsui Mining and Smelting Co., Ltd. | JAPAN | Conformant |
| Gold | CID001204 | Moscow Special Alloys Processing Plant | RUSSIAN FED. | Conformant |
| Gold | CID001220 | Nadir Metal Rafineri San. Ve Tic. A.S. | TURKEY | Conformant |
| Gold | CID001236 | Navoi Mining and Metallurgical Combinat | UZBEKISTAN | Conformant |
| Gold | CID001259 | Nihon Material Co., Ltd. | JAPAN | Conformant |
| Gold | CID001325 | Ohura Precious Metal Industry Co., Ltd. | JAPAN | Conformant |
| Gold | CID001326 | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | RUSSIAN FED. | Conformant |
| Gold | CID001352 | PAMP S.A. | SWITZERLAND | Conformant |
| Gold | CID001362 | Penglai Penggang Gold Industry Co., Ltd. | CHINA | Known |
| Gold | CID001386 | Prioksky Plant of Non-Ferrous Metals | RUSSIAN FED. | Conformant |
| Gold | CID001397 | PT Aneka Tambang (Persero) Tbk | INDONESIA | Conformant |
| Gold | CID001498 | PX Precinox S.A. | SWITZERLAND | Conformant |
| Gold | CID001512 | Rand Refinery (Pty) Ltd. | SOUTH AFRICA | Conformant |
| Gold | CID001534 | Royal Canadian Mint | CANADA | Conformant |
| Gold | CID001546 | Sabin Metal Corp. | USA | Known |
| Gold | CID001555 | Samduck Precious Metals | KOREA | Conformant |
| Gold | CID001562 | Samwon Metals Corp. | KOREA | Known |
| Gold | CID001585 | SEMPA Joyeria Plateria S.A. | SPAIN | Conformant |
| Gold | CID001619 | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | CHINA | Known |
| Gold | CID001622 | Shandong Zhaojin Gold & Silver Refinery Co., Ltd. | CHINA | Conformant |
| Gold | CID001736 | Sichuan Tianze Precious Metals Co., Ltd. | CHINA | Conformant |
| Gold | CID001756 | SOE Shyolkovsky Factory of Secondary Precious Metals | RUSSIAN FED. | Conformant |
| Gold | CID001761 | Solar Applied Materials Technology Corp. | TAIWAN, PROVINCE OF CHINA | Conformant |
| Gold | CID001798 | Sumitomo Metal Mining Co., Ltd. | JAPAN | Conformant |
| Gold | CID001875 | Tanaka Kikinzoku Kogyo K.K. | JAPAN | Conformant |
| Gold | CID001909 | Great Wall Precious Metals Co., Ltd. of CBPM | CHINA | Known |
| Gold | CID001916 | The Refinery of Shandong Gold Mining Co., Ltd. | CHINA | Conformant |
| Gold | CID001938 | Tokuriki Honten Co., Ltd. | JAPAN | Conformant |
| Gold | CID001947 | Tongling Nonferrous Metals Group Co., Ltd. | CHINA | Known |
| Gold | CID001955 | Torecom | KOREA | Conformant |
| Gold | CID001977 | Umicore Brasil Ltda. | BRAZIL | Known |
| Gold | CID001980 | Umicore S.A. Business Unit Precious Metals Refining | BELGIUM | Conformant |
| Gold | CID001993 | United Precious Metal Refining, Inc. | USA | Conformant |
| Gold | CID002003 | Valcambi S.A. | SWITZERLAND | Conformant |
| Gold | CID002030 | Western Australian Mint (T/a The Perth Mint) | AUSTRALIA | Conformant |
| Gold | CID002100 | Yamakin Co., Ltd. | JAPAN | Conformant |
| Gold | CID002129 | Yokohama Metal Co., Ltd. | JAPAN | Conformant |
| Gold | CID002224 | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | CHINA | Conformant |
| Gold | CID002243 | Gold Refinery of Zijin Mining Group Co., Ltd. | CHINA | Conformant |
| Gold | CID002282 | Morris and Watson | NEW ZEALAND | Known |
| Gold | CID002290 | SAFINA A.S. | CZECH REPUBLIC | Conformant |
| Gold | CID002312 | Guangdong Jinding Gold Limited | CHINA | Known |
| Gold | CID002314 | Umicore Precious Metals Thailand | THAILAND | Conformant |
| Gold | CID002459 | Geib Refining Corporation | USA | Conformant |
| Gold | CID002509 | MMTC-PAMP India Pvt., Ltd. | INDIA | Conformant |
| Gold | CID002511 | KGHM Polska Miedz Spolka Akcyjna | POLAND | Conformant |
| Gold | CID002515 | Fidelity Printers and Refiners Ltd. | ZIMBABWE | Known |
| Gold | CID002516 | Singway Technology Co., Ltd. | TAIWAN, PROVINCE OF CHINA | Conformant |
| Gold | CID002525 | Shandong Humon Smelting Co., Ltd. | CHINA | Known |
| Gold | CID002527 | [Smelter not listed] | CHINA | Known |
| Gold | CID002560 | Al Etihad Gold Refinery DMCC | UNITED ARAB EMIRATES | Conformant |
| Gold | CID002561 | Emirates Gold DMCC | UNITED ARAB EMIRATES | Conformant |
| Gold | CID002562 | International Precious Metal Refiners | UNITED ARAB EMIRATES | Active |
| Gold | CID002563 | Kaloti Precious Metals | UNITED ARAB EMIRATES | Known |

| <u>Metal</u> | <u>Smelter Identification</u> | <u>Smelter Reference List</u> | <u>Smelter Location</u> | <u>RMI Verified</u> |
|--------------|-------------------------------|--|-------------------------|---------------------|
| Gold | CID002567 | Sudan Gold Refinery | SUDAN | Known |
| Gold | CID002580 | T.C.A S.p.A | ITALY | Conformant |
| Gold | CID002582 | REMONDIS PMR B.V. | NETHERLANDS | Conformant |
| Gold | CID002584 | Fujairah Gold FZC | UNITED ARAB EMIRATES | Known |
| Gold | CID002587 | Tony Goetz NV | BELGIUM | Known |
| Gold | CID002588 | Shirpur Gold Refinery Ltd. | INDIA | Known |
| Gold | CID002605 | Korea Zinc Co., Ltd. | KOREA | Conformant |
| Gold | CID002606 | Marsam Metals | BRAZIL | Conformant |
| Gold | CID002615 | TOO Tau-Ken-Altyn | KAZAKHSTAN | Conformant |
| Gold | CID002708 | Abington Reldan Metals, LLC | USA | Known |
| Gold | CID002761 | SAAMP | FRANCE | Conformant |
| Gold | CID002762 | L'Orfebre S.A. | ANDORRA | Conformant |
| Gold | CID002763 | 8853 S.p.A. | ITALY | Conformant |
| Gold | CID002765 | Italpreziosi | ITALY | Conformant |
| Gold | CID002777 | SAXONIA Edelmetalle GmbH | GERMANY | Conformant |
| Gold | CID002778 | WIELAND Edelmetalle GmbH | GERMANY | Conformant |
| Gold | CID002779 | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH | AUSTRIA | Conformant |
| Gold | CID002850 | AU Traders and Refiners | SOUTH AFRICA | Conformant |
| Gold | CID002852 | GCC Gujrat Gold Centre Pvt. Ltd. | INDIA | Known |
| Gold | CID002853 | Sai Refinery | INDIA | Known |
| Gold | CID002857 | Modeltech Sdn Bhd | MALAYSIA | Known |
| Gold | CID002863 | Bangalore Refinery | INDIA | Conformant |
| Gold | CID002865 | Kyshtym Copper-Electrolytic Plant ZAO | RUSSIAN FED. | Known |
| Gold | CID002867 | Degussa Sonne / Mond Goldhandel GmbH | GERMANY | Known |
| Gold | CID002872 | Pease & Curren | USA | Known |
| Gold | CID002893 | JALAN & Company | INDIA | Known |
| Gold | CID002918 | SungEel HiMetal Co., Ltd. | KOREA | Conformant |
| Gold | CID002919 | Planta Recuperadora de Metales SpA | CHILE | Conformant |
| Gold | CID002973 | Safimet S.p.A | ITALY | Conformant |
| Gold | CID003153 | State Research Institute Center for Physical Sciences and Technology | LITHUANIA | Known |
| Gold | CID003185 | African Gold Refinery | UGANDA | Known |
| Gold | CID003186 | Gold Coast Refinery | GHANA | Known |
| Gold | CID003189 | NH Recytech Company | KOREA | Known |
| Gold | CID003195 | DS PRETECH Co., Ltd. | KOREA | Conformant |
| Gold | CID003324 | QG Refining, LLC | USA | Known |
| Gold | CID003348 | Dijllah Gold Refinery FZC | UNITED ARAB EMIRATES | Known |
| Gold | CID003382 | CGR Metalloys Pvt Ltd. | INDIA | Known |
| Gold | CID003383 | Sovereign Metals | INDIA | Known |
| Gold | CID003421 | C.I Metales Procesados Industriales SAS | COLOMBIA | Active |
| Gold | CID003424 | Eco-System Recycling Co., Ltd. North Plant | JAPAN | Conformant |
| Gold | CID003425 | Eco-System Recycling Co., Ltd. West Plant | JAPAN | Conformant |
| Gold | CID003461 | Augmont Enterprises Private Limited | INDIA | Active |
| Gold | CID003463 | Kundan Care Products Ltd. | INDIA | Known |
| Gold | CID003487 | [Smelter Not Listed] | INDIA | Known |
| Gold | CID003488 | [Smelter Not Listed] | INDIA | Known |
| Gold | CID003489 | [Smelter Not Listed] | INDIA | Known |
| Gold | CID003490 | [Smelter Not Listed] | INDIA | Known |
| Gold | CID003497 | [Smelter Not Listed] | NORWAY | Known |
| Gold | CID003500 | [Smelter Not Listed] | USA | Active |
| Gold | CID003529 | [Smelter Not Listed] | COLOMBIA | Known |
| Gold | CID003540 | [Smelter Not Listed] | MAURITANIA | Known |
| Gold | CID003548 | [Smelter Not Listed] | INDIA | Known |
| Gold | CID003557 | [Smelter Not Listed] | USA | Active |
| Gold | CID003575 | [Smelter Not Listed] | SOUTH AFRICA | Conformant |
| Tantalum | CID000092 | Asaka Riken Co., Ltd. | JAPAN | Conformant |
| Tantalum | CID000211 | Changsha South Tantalum Niobium Co., Ltd. | CHINA | Conformant |
| Tantalum | CID000456 | Exotech Inc. | USA | Conformant |
| Tantalum | CID000460 | F&X Electro-Materials Ltd. | CHINA | Conformant |
| Tantalum | CID000616 | Guangdong Zhiyuan New Material Co., Ltd. | CHINA | Conformant |
| Tantalum | CID000914 | JiuJiang JinXin Nonferrous Metals Co., Ltd. | CHINA | Conformant |
| Tantalum | CID000917 | Jiujiang Tanbre Co., Ltd. | CHINA | Conformant |

| <u>Metal</u> | <u>Smelter Identification</u> | <u>Smelter Reference List</u> | <u>Smelter Location</u> | <u>RMI Verified</u> |
|--------------|-------------------------------|---|---------------------------|---------------------|
| Tantalum | CID001076 | LSM Brasil S.A. | BRAZIL | Conformant |
| Tantalum | CID001163 | Metallurgical Products India Pvt., Ltd. | INDIA | Conformant |
| Tantalum | CID001175 | Mineracao Taboca S.A. | BRAZIL | Conformant |
| Tantalum | CID001192 | Mitsui Mining and Smelting Co., Ltd. | JAPAN | Conformant |
| Tantalum | CID001200 | NPM Silmet AS | ESTONIA | Conformant |
| Tantalum | CID001277 | Ningxia Orient Tantalum Industry Co., Ltd. | CHINA | Conformant |
| Tantalum | CID001508 | QuantumClean | USA | Conformant |
| Tantalum | CID001522 | Yanling Jincheng Tantalum & Niobium Co., Ltd. | CHINA | Conformant |
| Tantalum | CID001769 | Solikamsk Magnesium Works OAO | RUSSIAN FED. | Conformant |
| Tantalum | CID001869 | Taki Chemical Co., Ltd. | JAPAN | Conformant |
| Tantalum | CID001891 | Telex Metals | USA | Conformant |
| Tantalum | CID001969 | Ulba Metallurgical Plant JSC | KAZAKHSTAN | Conformant |
| Tantalum | CID002492 | Hengyang King Xing Lifeng New Materials Co., Ltd. | CHINA | Conformant |
| Tantalum | CID002504 | D Block Metals, LLC | USA | Conformant |
| Tantalum | CID002505 | FIR Metals & Resource Ltd. | CHINA | Conformant |
| Tantalum | CID002506 | Jiujiang Zhongao Tantalum & Niobium Co., Ltd. | CHINA | Conformant |
| Tantalum | CID002508 | XinXing HaoRong Electronic Material Co., Ltd. | CHINA | Conformant |
| Tantalum | CID002512 | Jiangxi Dinghai Tantalum & Niobium Co., Ltd. | CHINA | Conformant |
| Tantalum | CID002539 | KEMET Blue Metals | MEXICO | Conformant |
| Tantalum | CID002544 | H.C. Starck Co., Ltd. | THAILAND | Conformant |
| Tantalum | CID002545 | H.C. Starck Tantalum and Niobium GmbH | GERMANY | Conformant |
| Tantalum | CID002547 | H.C. Starck Hermsdorf GmbH | GERMANY | Conformant |
| Tantalum | CID002548 | H.C. Starck Inc. | USA | Conformant |
| Tantalum | CID002549 | H.C. Starck Ltd. | JAPAN | Conformant |
| Tantalum | CID002550 | H.C. Starck Smelting GmbH & Co. KG | GERMANY | Conformant |
| Tantalum | CID002557 | Global Advanced Metals Boyertown | USA | Conformant |
| Tantalum | CID002558 | Global Advanced Metals Aizu | JAPAN | Conformant |
| Tantalum | CID002707 | Resind Industria e Comercio Ltda. | BRAZIL | Conformant |
| Tantalum | CID002842 | Jiangxi Tuohong New Raw Material | CHINA | Conformant |
| Tantalum | CID002847 | PRG Dooel | NORTH MACEDONIA | Conformant |
| Tin | CID000228 | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | CHINA | Conformant |
| Tin | CID000292 | Alpha | USA | Conformant |
| Tin | CID000402 | Dowa | JAPAN | Conformant |
| Tin | CID000438 | EM Vinto | BOLIVIA | Conformant |
| Tin | CID000448 | Estanho de Rondonia S.A. | BRAZIL | Active |
| Tin | CID000468 | Fenix Metals | POLAND | Conformant |
| Tin | CID000538 | Gejiu Non-Ferrous Metal Processing Co., Ltd. | CHINA | Conformant |
| Tin | CID000555 | Gejiu Zili Mining And Metallurgy Co., Ltd. | CHINA | Conformant |
| Tin | CID000760 | Huichang Jinshunda Tin Co., Ltd. | CHINA | Conformant |
| Tin | CID000942 | Gejiu Kai Meng Industry and Trade LLC | CHINA | Conformant |
| Tin | CID001070 | China Tin Group Co., Ltd. | CHINA | Conformant |
| Tin | CID001105 | Malaysia Smelting Corporation (MSC) | MALAYSIA | Conformant |
| Tin | CID001142 | Metallic Resources, Inc. | USA | Conformant |
| Tin | CID001173 | Mineracao Taboca S.A. | BRAZIL | Conformant |
| Tin | CID001182 | Minsur | PERU | Conformant |
| Tin | CID001191 | Mitsubishi Materials Corporation | JAPAN | Conformant |
| Tin | CID001231 | Jiangxi New Nanshan Technology Ltd. | CHINA | Conformant |
| Tin | CID001305 | [Smelter Not Listed] | RUSSIAN FED. | Active |
| Tin | CID001314 | O.M. Manufacturing (Thailand) Co., Ltd. | THAILAND | Conformant |
| Tin | CID001337 | Operaciones Metalurgicas S.A. | BOLIVIA | Conformant |
| Tin | CID001399 | PT Artha Cipta Langgeng | INDONESIA | Conformant |
| Tin | CID001406 | PT Babel Surya Alam Lestari | INDONESIA | Conformant |
| Tin | CID001453 | PT Mitra Stania Prima | INDONESIA | Conformant |
| Tin | CID001460 | PT Refined Bangka Tin | INDONESIA | Conformant |
| Tin | CID001468 | PT Stanindo Inti Perkasa | INDONESIA | Conformant |
| Tin | CID001477 | PT Timah Tbk Kundur | INDONESIA | Conformant |
| Tin | CID001482 | PT Timah Tbk Mentok | INDONESIA | Conformant |
| Tin | CID001486 | PT Pelat Timah Nusantara Tbk | INDONESIA | Active |
| Tin | CID001490 | PT Tinindo Inter Nusa | INDONESIA | Active |
| Tin | CID001539 | Rui Da Hung | TAIWAN, PROVINCE OF CHINA | Conformant |
| Tin | CID001758 | Soft Metais Ltda. | BRAZIL | Conformant |
| Tin | CID001898 | Thaisarco | THAILAND | Conformant |
| Tin | CID001908 | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | CHINA | Conformant |
| Tin | CID002015 | VQB Mineral and Trading Group JSC | VIET NAM | Known |

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|--------------|-------------------------------|---|-------------------------|---------------------|
| Tin | CID002036 | White Solder Metalurgia e Mineracao Ltda. | BRAZIL | Conformant |
| Tin | CID002158 | Yunnan Chengfeng Non-ferrous Metals Co., Ltd. | CHINA | Conformant |
| Tin | CID002180 | Yunnan Tin Company Limited | CHINA | Conformant |
| Tin | CID002455 | CV Venus Inti Perkasa | INDONESIA | Active |
| Tin | CID002468 | Magnu's Minerai's Metais e Ligas Ltda. | BRAZIL | Conformant |
| Tin | CID002500 | Melt Metais e Ligas S.A. | BRAZIL | Conformant |
| Tin | CID002503 | PT ATD Makmur Mandiri Jaya | INDONESIA | Conformant |
| Tin | CID002517 | O.M. Manufacturing Philippines, Inc. | PHILIPPINES | Conformant |
| Tin | CID002570 | CV Ayi Jaya | INDONESIA | Active |
| Tin | CID002572 | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | VIETNAM | Known |
| Tin | CID002573 | Nghe Tinh Non-Ferrous Metals Joint Stock Company | VIETNAM | Known |
| Tin | CID002574 | Tuyen Quang Non-Ferrous Metals Joint Stock Company | VIETNAM | Known |
| Tin | CID002593 | PT Rajehan Ariq | INDONESIA | Conformant |
| Tin | CID002703 | An Vinh Joint Stock Mineral Processing Company | VIETNAM | Known |
| Tin | CID002706 | Resind Industria e Comercio Ltda. | BRAZIL | Conformant |
| Tin | CID002756 | Super Ligas | BRAZIL | Active |
| Tin | CID002773 | Metallo Belgium N.V. | BELGIUM | Conformant |
| Tin | CID002774 | Metallo Spain S.L.U. | SPAIN | Conformant |
| Tin | CID002834 | Thai Nguyen Mining and Metallurgy Co., Ltd. | VIETNAM | Conformant |
| Tin | CID002844 | HuiChang Hill Tin Industry Co., Ltd. | CHINA | Conformant |
| Tin | CID002848 | Gejiu Fengming Metallurgy Chemical Plant | CHINA | Conformant |
| Tin | CID002849 | Guanyang Guida Nonferrous Metal Smelting Plant | CHINA | Conformant |
| Tin | CID002858 | Modeltech Sdn Bhd | MALAYSIA | Known |
| Tin | CID002870 | Smelter not listed | INDONESIA | Active |
| Tin | CID003116 | Guangdong Hanhe Non-Ferrous Metal Co., Ltd. | CHINA | Conformant |
| Tin | CID003190 | Chifeng Dajingzi Tin Industry Co., Ltd. | CHINA | Conformant |
| Tin | CID003205 | PT Bangka Serumpun | INDONESIA | Conformant |
| Tin | CID003208 | Pongpipat Company Limited | MYANMAR | Known |
| Tin | CID003325 | Tin Technology & Refining | USA | Conformant |
| Tin | CID003356 | Dongguan CiEXPO Environmental Engineering Co., Ltd. | CHINA | Known |
| Tin | CID003379 | Ma'anshan Weitai Tin Co., Ltd. | CHINA | Conformant |
| Tin | CID003381 | PT Rajawali Rimba Perkasa | INDONESIA | Conformant |
| Tin | CID003387 | Luna Smelter, Ltd. | RWANDA | Conformant |
| Tin | CID003397 | Yunnan Yunfan Non-ferrous Metals Co., Ltd. | CHINA | Conformant |
| Tin | CID003409 | Precious Minerals and Smelting Limited | INDIA | Known |
| Tin | CID003410 | Gejiu City Fuxiang Industry and Trade Co., Ltd. | CHINA | Known |
| Tin | CID003449 | PT Mitra Sukses Globalindo | INDONESIA | Known |
| Tin | CID003486 | Smelter Not Listed | BRAZIL | Active |
| Tin | CID003524 | Smelter Not Listed | SPAIN | Active |
| Tungsten | CID000004 | A.L.M.T. Corp. | JAPAN | Conformant |
| Tungsten | CID000105 | Kennametal Huntsville | USA | Conformant |
| Tungsten | CID000218 | Guangdong Xianglu Tungsten Co., Ltd. | CHINA | Conformant |
| Tungsten | CID000258 | Chongyi Zhangyuan Tungsten Co., Ltd. | CHINA | Conformant |
| Tungsten | CID000281 | CNMC (Guangxi) PGMA Co., Ltd. | CHINA | Known |
| Tungsten | CID000499 | Fujian Jinxin Tungsten Co., Ltd. | CHINA | Conformant |
| Tungsten | CID000568 | Global Tungsten & Powders Corp. | USA | Conformant |
| Tungsten | CID000766 | Hunan Chenzhou Mining Co., Ltd. | CHINA | Conformant |
| Tungsten | CID000769 | Hunan Chunchang Nonferrous Metals Co., Ltd. | CHINA | Conformant |
| Tungsten | CID000825 | Japan New Metals Co., Ltd. | JAPAN | Conformant |
| Tungsten | CID000875 | Ganzhou Huaxing Tungsten Products Co., Ltd. | CHINA | Conformant |
| Tungsten | CID000966 | Kennametal Fallon | USA | Conformant |
| Tungsten | CID001889 | Tejing (Vietnam) Tungsten Co., Ltd. | VIETNAM | Conformant |
| Tungsten | CID002044 | Wolfram Bergbau und Hutten AG | AUSTRIA | Conformant |
| Tungsten | CID002082 | Xiamen Tungsten Co., Ltd. | CHINA | Conformant |
| Tungsten | CID002095 | Xinhai Rendan Shaoguan Tungsten Co., Ltd. | CHINA | Known |
| Tungsten | CID002313 | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. | CHINA | Known |
| Tungsten | CID002315 | Ganzhou Jiangwu Ferrotungsten Co., Ltd. | CHINA | Conformant |
| Tungsten | CID002316 | Jiangxi Yaosheng Tungsten Co., Ltd. | CHINA | Conformant |
| Tungsten | CID002317 | Jiangxi Xinsheng Tungsten Industry Co., Ltd. | CHINA | Conformant |
| Tungsten | CID002318 | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | CHINA | Conformant |
| Tungsten | CID002319 | Malipo Haiyu Tungsten Co., Ltd. | CHINA | Conformant |
| Tungsten | CID002320 | Xiamen Tungsten (H.C.) Co., Ltd. | CHINA | Conformant |
| Tungsten | CID002321 | Jiangxi Gan Bei Tungsten Co., Ltd. | CHINA | Conformant |

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|--------------|-------------------------------|---|------------------------------|---------------------|
| Tungsten | CID002494 | Ganzhou Seadragon W & Mo Co., Ltd. | CHINA | Conformant |
| Tungsten | CID002502 | Asia Tungsten Products Vietnam Ltd. | VIETNAM | Conformant |
| Tungsten | CID002513 | Chenzhou Diamond Tungsten Products Co., Ltd. | CHINA | Conformant |
| Tungsten | CID002541 | H.C. Starck Tungsten GmbH | GERMANY | Conformant |
| Tungsten | CID002542 | H.C. Starck Smelting GmbH & Co. KG | GERMANY | Conformant |
| Tungsten | CID002543 | Masan Tungsten Chemical LLC (MTC) | VIETNAM | Conformant |
| Tungsten | CID002551 | Jiangwu H.C. Starck Tungsten Products Co., Ltd. | CHINA | Conformant |
| Tungsten | CID002579 | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji | CHINA | Conformant |
| Tungsten | CID002589 | Niagara Refining LLC | USA | Conformant |
| Tungsten | CID002641 | China Molybdenum Co., Ltd. | CHINA | Active |
| Tungsten | CID002645 | Ganzhou Haichuang Tungsten Co., Ltd. | CHINA | Conformant |
| Tungsten | CID002649 | Hydrometallurg, JSC | RUSSIAN FED. | Conformant |
| Tungsten | CID002724 | Unecha Refractory metals plant | RUSSIAN FED. | Conformant |
| Tungsten | CID002827 | Philippine Chuangxin Industrial Co., Inc. | PHILIPPINES | Conformant |
| Tungsten | CID002830 | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd. | CHINA | Conformant |
| Tungsten | CID002833 | ACL Metais Eireli | BRAZIL | Conformant |
| Tungsten | CID002843 | Woltech Korea Co., Ltd. | KOREA | Conformant |
| Tungsten | CID002845 | Moliren Ltd. | RUSSIAN FEDERATION | Conformant |
| Tungsten | CID003388 | KGETS Co., Ltd. | KOREA | Conformant |
| Tungsten | CID003401 | Fujian Ganmin RareMetal Co., Ltd. | CHINA | Conformant |
| Tungsten | CID003407 | Lianyou Metals Co., Ltd. | TAIWAN, PROVINCE OF CHINA | Conformant |
| Tungsten | CID003408 | JSC "Kirovgrad Hard Alloys Plant" | RUSSIAN FED. | Active |
| Tungsten | CID003416 | NPP Tyazhmetprom LLC | RUSSIAN FED. | Active |
| Tungsten | CID003417 | GEM Co., Ltd. | CHINA | Known |
| Tungsten | CID003427 | Albasteel Industria e Comercio de Ligas Para Fundicao Ltd. | BRAZIL | Active |
| Tungsten | CID003468 | Cronimet Brasil Ltda | BRAZIL | Active |
| Tungsten | CID003553 | [Smelter Not Listed] | RUSSIAN FED. | Active |