

**UNITED STATES
SECURITIES AND EXCHANGE COMMISSION**

Washington, D.C. 20549

Form SD

Specialized Disclosure Report

EchoStar Corporation

(Exact name of registrant as specified in its charter)

Nevada

(State or Other Jurisdiction of Incorporation
or Organization)

001-33807

(Commission File Number)

26-1232727

(I.R.S. Employer Identification No.)

100 Inverness Terrace East, Englewood, Colorado

(Address of Principal Executive Offices)

80112-5308

(Zip Code)

Dean A. Manson

Executive Vice President, General Counsel and Secretary

(303) 706-4000

(Name and telephone number, including area code, of person to contact in connection with this report)

Hughes Satellite Systems Corporation

(Exact name of registrant as specified in its charter)

Colorado

(State or Other Jurisdiction of Incorporation
or Organization)

333-179121

(Commission File Number)

45-0897865

(I.R.S. Employer Identification No.)

100 Inverness Terrace East, Englewood, Colorado

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Executive Vice President, General Counsel and Secretary

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

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2019.

EXPLANATORY NOTE

EchoStar Corporation (“EchoStar”) and its subsidiary, Hughes Satellite Systems Corporation (“Hughes”), each has prepared this Specialized Disclosure Report on Form SD (“Form SD”) pursuant to Rule 13p-1 (the “Rule”) promulgated under the Securities Exchange Act of 1934, as amended (the “Exchange Act”), for the reporting period of January 1 to December 31, 2019. Unless the context indicates otherwise, any reference in this Form SD to the “Company,” “we,” “us” and “our” refer to EchoStar, Hughes and their respective subsidiaries through December 31, 2019. Each of EchoStar and Hughes is filing this Form SD and the attached Conflict Minerals Report separately and on its own behalf.

SECTION 1—CONFLICT MINERALS DISCLOSURE

ITEM 1.01. Conflict Minerals Disclosure and Report

Introduction

The Rule requires disclosure of certain information when a registrant manufactures, or contracts to manufacture, products whose manufacture was completed during the relevant reporting period that contain certain minerals that are necessary to the functionality or production of such products (the “Covered Products”). The specified minerals are gold, columbite-tantalite (coltan), cassiterite and wolframite, including their derivatives, which are limited to tantalum, tin and tungsten (collectively, the “Conflict Minerals”). For the Covered Products, the registrant must conduct in good faith a reasonable country of origin inquiry designed to determine whether any of the Conflict Minerals originated in the Democratic Republic of the Congo or certain adjoining countries (each, a “Covered Country” and collectively, the “Covered Countries”). If, based on such inquiry, a registrant knows or has reason to believe that any of the Conflict Minerals contained in its products originated or may have originated in a Covered Country and that such Conflict Minerals are not or may not be solely from recycled or scrap sources, the registrant must conduct due diligence with respect to the source and chain of custody of the Conflict Minerals to determine the origin of such Conflict Minerals and whether they directly or indirectly financed or benefited armed groups in the Covered Countries.

Conclusion Based on Reasonable Country of Origin Inquiry

In accordance with the Rule, for the reporting period of January 1 to December 31, 2019, the Company:

- Determined that the Company manufactured, or contracted to manufacture, certain Covered Products.
- Conducted a good faith reasonable country of origin inquiry which was reasonably designed to determine whether any of the Conflict Minerals in our Covered Products originated in the Covered Countries and, if so, whether any of such Conflict Minerals were from recycled or scrap sources. Based on that inquiry, the Company has reason to believe that some of the Conflict Minerals in our Covered Products may have originated in one or more of the Covered Countries and that such Conflict Minerals may not have been from recycled or scrap sources.
- Conducted due diligence with respect to the source and chain of custody of such Conflict Minerals.

Based on the information obtained through our reasonable country of origin inquiry and our due diligence efforts, which significantly overlap, the Company has reasonably determined that countries of origin of the Conflict Minerals in the Covered Products, to the extent known, included Burundi, Central African Republic, the Democratic Republic of the Congo, Rwanda, Tanzania and Uganda.

Conflict Minerals Disclosure

Based on the results of the procedures described above, the Company has filed this Form SD and the attached Conflict Minerals Report. A copy of the Company’s Conflict Minerals Report is filed as Exhibit 1.01 to this Form SD, and is publicly available on the Company’s website at <http://ir.echostar.com/financial-information/sec-filings>. Unless otherwise stated in this Form SD and the Conflict Minerals Report filed as Exhibit 1.01 hereto, any documents, third-party materials or references to websites, including the Company’s website, are not incorporated by reference in, or considered to be a part of, this Form SD and the attached Conflict Minerals Report.

Forward-Looking Statements

This Form SD and the attached Conflict Minerals Report may contain “forward-looking statements” within the meaning of the Private Securities Litigation Reform Act of 1995, Section 27A of the Securities Act of 1933, as amended, and Section 21E of the Exchange Act, including but not limited to statements about our estimates, expectations, plans, objectives, strategies, and financial condition, expected impact of regulatory developments and legal proceedings, opportunities in our industries and businesses and other trends and projections for the future. All statements, other than statements of historical facts, may be forward-looking statements. Forward-looking statements may also be identified by words such as “anticipate,” “intend,” “plan,” “goal,” “seek,” “believe,” “estimate,” “expect,” “predict,” “continue,” “future,” “will,” “would,” “could,” “can,” “may” and similar expressions that convey uncertainty of future events or outcomes and the negatives of those terms. These forward-looking statements are based on information available to us as of the date of this Form SD and the attached Conflict Minerals Report and represent management’s current views and assumptions about future events. Forward-looking statements are not guarantees of future performance, actions, events or results and involve potential known and unknown risks, uncertainties and other factors, many of which may be beyond our control and may pose a risk to our operating and financial condition. Accordingly, actual performance, events or results could differ materially from those expressed or implied in the forward-looking statements due to a number of factors. Important factors that could cause actual outcomes to differ materially from those contained in any forward-looking statement include those described in EchoStar’s and Hughes’s respective reports, including EchoStar’s and Hughes’s respective annual reports on Form 10-K for the fiscal year ended December 31, 2019, EchoStar’s and Hughes’s respective quarterly reports on Form 10-Q and other documents that each of EchoStar and Hughes files with or furnishes to the Securities and Exchange Commission from time to time. You should not put undue reliance on any forward-looking statements. Unless we are required to do so under U.S. federal securities laws or other applicable laws, we do not intend to update or revise any forward-looking statements. All cautionary statements made herein should be read as being applicable to all forward-looking statements wherever they appear. Investors should consider the risks and uncertainties described herein and should not place undue reliance on any forward-looking statements, which speak only as of the date hereof. We do not undertake, and specifically disclaim, any obligation to publicly release the results or any revisions that may be made to any forward-looking statements, whether as a result of new information, future events or otherwise, except as required by law.

ITEM 1.02. Exhibit

As specified in Section 2, Item 2.01 of this Form SD, the Company is hereby filing its Conflict Minerals Report as Exhibit 1.01 to this Form SD.

SECTION 2—EXHIBITS

ITEM 2.01. Exhibits

The following exhibit is filed as part of this Form SD.

<u>Exhibit No.</u>	<u>Description</u>
1.01	Conflict Minerals Report of EchoStar Corporation and Hughes Satellite Systems Corporation for the reporting period of January 1 to December 31, 2019.

SIGNATURES

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

May 21, 2020

ECHOSTAR CORPORATION

By: /s/ Dean A. Manson
Dean A. Manson *Executive Vice President, General Counsel
and Secretary*

May 21, 2020

HUGHES SATELLITE SYSTEMS CORPORATION

By: /s/ Dean A. Manson
Dean A. Manson
*Executive Vice President, General Counsel
and Secretary*

EXHIBIT INDEX

<u>Exhibit No.</u>	<u>Description</u>
1.01	Conflict Minerals Report of EchoStar Corporation and Hughes Satellite Systems Corporation for the reporting period of January 1 to December 31, 2019.

**ECHOSTAR CORPORATION
HUGHES SATELLITE SYSTEMS CORPORATION**

Conflict Minerals Report

For the reporting period from January 1 to December 31, 2019

Introduction and Background

This Conflict Minerals Report (the “Report”) of EchoStar Corporation (“EchoStar”) and Hughes Satellite Systems Corporation (“Hughes” and, together with EchoStar and the respective subsidiaries of EchoStar and Hughes through December 31, 2019, the “Company,” “we,” “our” and/or “us”) has been prepared pursuant to Rule 13p-1 (the “Rule”) promulgated under the Securities Exchange Act of 1934, as amended, for the reporting period from January 1 to December 31, 2019. The Rule requires disclosure of certain information when a company manufactures or contracts to manufacture products and the minerals specified in the Rule are necessary to the functionality or production of those products. The specified minerals are gold, columbite-tantalite (coltan), cassiterite and wolframite, including their derivatives, which are limited to tantalum, tin and tungsten (collectively, the “Conflict Minerals”) that originated in the Democratic Republic of the Congo (“DRC”) and certain adjoining countries (collectively with the DRC, the “Covered Countries”).

Pursuant to the Rule, the Company has concluded, in good faith, that during the reporting period of January 1 to December 31, 2019:

- the Company manufactured, or contracted to manufacture, certain products whose manufacture was completed in calendar year 2019 as to which Conflict Minerals are necessary to the functionality or production of those products (our “Covered Products”); and
- based on a good faith reasonable country of origin inquiry (“RCOI”) regarding the Conflict Minerals in our Covered Products, the Company had reason to believe that certain of the Conflict Minerals necessary to the functionality or production of our Covered Products may have originated in one or more of the Covered Countries and that such Conflict Minerals may not have been from recycled or scrap sources.

Therefore, the Company performed due diligence on the source and chain of custody of such Conflict Minerals in our Covered Products. The Company is filing this Report with our Specialized Disclosure Report on Form SD (the “Form SD”) to comply with the requirements of the Rule. This Report has not been subject to an independent private sector audit.

PART I. COMPANY OVERVIEW AND DESCRIPTION OF PRODUCTS COVERED BY THIS REPORT

Description of Products

We are a global provider of broadband satellite technologies and broadband internet services to domestic and international consumer customers, which include home and small to medium-sized businesses, and satellite services. We also deliver innovative network technologies, managed services and communications solutions for domestic and international enterprise customers, which include aeronautical and government enterprises.

This Report relates to our Covered Products under our Hughes business segment for the entire reporting period, which consisted of the following:

Broadband Satellite Systems — The Company’s broadband and satellite products included broadband systems and terminals, mobile satellite systems, handheld devices and IP data terminals for mobile satellite operators, all of which support the delivery of a wide range of bandwidth-intensive services as well as privately-branded service offerings, including high-speed internet/intranet access, video conferencing, distance learning, telemedicine, newsgathering, fleet operations and broadband on planes, trains and maritime.

Certain of our Covered Products were designed, developed, engineered, manufactured, assembled and/or distributed by us; however, we also outsourced a significant portion of these functions to third parties. We worked with third-party vendors for the development and manufacture of components that are integrated into our Covered Products. We developed dual sourcing capabilities for critical parts when practical and we evaluated outsourced subcontract vendors on a periodic basis.

PART II. DESIGN OF OUR DUE DILIGENCE MEASURES

We designed our due diligence measures based on the five-step framework laid out by the Organization for Economic Co-operation and Development in its OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition (2016), including the related supplements on gold, tin, tantalum and tungsten (collectively, the “OECD Guidance”). Summarized below are the components of our due diligence measures as they relate to the five-step framework from the OECD Guidance.

1. Establish Strong Company Management Systems for Conflict Minerals Supply Chain Due Diligence

Designate Internal Corporate Team

The Company has designated an internal team, composed of senior members of the Company’s supply chain and procurement operations and the legal department, which evaluates the Company’s applicable supply chain processes and sourcing procedures and designs and supports the Company’s due diligence efforts. The team meets periodically to develop and refine a due diligence process that:

- is consistent with the OECD Guidance,
- conforms to the requirements of the Rule, and
- is appropriate given the structure and operations of the Company’s supply chain departments.

The Company’s internal audit department monitors the diligence process, provides feedback and reviews the due diligence results. Senior supply chain managers disseminate necessary information and documentation to relevant employees responsible for interfacing directly with suppliers and manufacturers (collectively referred to as “suppliers”).

Commit to a Supply Chain Policy for Minerals from Conflict-Affected and High-Risk Areas

The Company maintains a policy relating to Conflict Minerals (the “Policy”), which generally requires suppliers to:

- have a policy to reasonably assure that the Conflict Minerals in the products they manufacture for or supply to the Company do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Covered Countries;
- exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to the Company upon the Company’s request; and
- be prepared to assist the Company in meeting the Conflict Minerals reporting requirements under the Rule, as well as other national or international mineral reporting regimes that may arise in the future.

The Policy is incorporated into the Company’s supplier code of conduct. All of our suppliers during the reporting period were obligated to comply with the Policy.

Establish a System of Controls and Transparency over the Conflict Minerals Supply Chain

The Company employs a system of controls to promote transparency over our Conflict Minerals supply chain by utilizing the Conflict Minerals Reporting Template version 5.12 (“Conflict Minerals Reporting Template”), which is a standardized supply chain survey designed to facilitate the transfer of information through the supply chain to identify the smelters and refiners that process Conflict Minerals in our Covered Products. The Conflict Minerals Reporting

Template was developed by the Responsible Minerals Initiative (“RMI”), a Responsible Business Alliance and Global e-Sustainability Initiative. The Company maintains an automated database of the completed Conflict Minerals Reporting Templates submitted to the Company by our suppliers (the “Conflict Minerals Response Database”), which helps us process and analyze the information provided by our suppliers. Once in the Conflict Minerals Response Database, all completed Conflict Mineral Reporting Templates received from suppliers are stored electronically in a central location accessible to authorized employees involved in the due diligence process and are retained in accordance with the Company’s document retention guidelines.

Since 2015, the Company has been a member of RMI, an organization committed to the responsible sourcing of Conflict Minerals that currently has over 380 participating companies and associations from around the world. As a member, the Company has access to a variety of tools and resources to better assess Conflict Minerals in our supply chain, including the Responsible Minerals Assurance Process (“RMAP”), an audit program designed to validate smelters’ and refiners’ sourcing practices.

Strengthen the Company’s Engagement with Suppliers

We generally inform our suppliers of our Policy, our due diligence consistent with OECD Guidance and our compliance with the Rule. Moreover, the Company’s purchase order and contract terms and conditions generally require that suppliers expressly support the supply chain due diligence process employed by the Company.

Establish a Company-Level Grievance Mechanism

The Company maintains a reporting system through which employees and third parties may report concerns about potential or actual violations of the Policy. Concerns may be reported anonymously or for attribution through several channels, including through an employee’s immediate manager or the Company’s legal department.

2. Identify and Assess the Risks in the Company’s Supply Chain

The Company does not purchase Conflict Minerals directly from mines, smelters or refiners and does not have a direct relationship with any mines, smelters or refiners. The Company’s supply chain with respect to our Covered Products is complex, and there are many third parties in the supply chain between the ultimate manufacturer of our Covered Products and the original sources of the Conflict Minerals. As a result, we designed our due diligence to conform to the requirements of the Rule and the OECD Guidance as applicable for downstream companies. Because the Company believes that the smelters and refiners of the Conflict Minerals are best situated to identify the sources of Conflict Minerals, the Company relies on communications with suppliers to identify the applicable smelters and refiners of Conflict Minerals in the Company’s supply chain. In particular, the Company performs the following measures to identify Conflict Minerals in our Covered Products.

Identify Company Suppliers

The Company identifies our first-tier suppliers by generating reports from the Company’s applicable manufacturing and procurement systems of all manufacturers who made, and all vendors who supplied components or products, for our Covered Products. For components delivered to the Company by distributors, the Company adds the distributors to the supplier list. Senior managers in the supply chain organization review and finalize the supplier list (the “Supplier List”) to create a list that includes all relevant suppliers for purposes of the Rule.

Request Conflict Minerals Reporting Templates from Suppliers

The Company uses good faith efforts to identify from the Conflict Minerals Reporting Templates the smelters and refiners used by our suppliers on the Supplier List. Annually, the Company sends a letter and the Conflict Minerals Reporting Template to the suppliers on the Supplier List. The letter (i) reiterates the requirements of the Rule and its applicability to the Company, (ii) requests that each supplier complete the Conflict Minerals Reporting Template for all Covered Products supplied to the Company for the reporting period, and (iii) encourages suppliers to use smelters and refiners which appear on the RMAP’s Conformant Smelter List (as described below). The Company contacts suppliers that do not respond to the Company’s request by a specified date as well as suppliers that submit incomplete or inaccurate requests for follow-on discussions and to request additional information, as applicable.

As set forth in the Conflict Minerals Reporting Template and the OECD Guidance, suppliers make representations or provide information regarding, among other things, (i) the country of origin for the Conflict Minerals contained in components or products provided by the supplier to the Company, (ii) whether such Conflict Minerals directly or indirectly finance armed conflict in the Covered Countries, (iii) smelters and refiners in the supplier's supply chain for such Conflict Minerals, (iv) whether such smelters and refiners have been validated in compliance with the RMAP, (v) whether such supplier uses the Conflict Minerals Reporting Template with its own suppliers to gather information, and (vi) whether the supplier has its own conflict mineral policy that requires its direct suppliers to be conformant.

Analyze Surveys for RMAP Conformant and Active Smelters and Refiners

If correctly and fully completed, each Conflict Minerals Reporting Template identifies the smelters and refiners within the applicable supplier's supply chain. The Company reviews the information in the completed Conflict Minerals Reporting Templates against the RMAP's Conformant Smelter List to determine whether the smelters or refiners associated with the applicable supplier qualify as "conformant" or "RMAP Active." We rely upon third party audits of smelters and refiners as part of the RMI's RMAP, an audit program designed to validate smelters' and refiners' sourcing practices as described below. Smelters and refiners receive a "conformant" designation from RMI if (i) the audited smelter or refiner adheres to the RMAP's assessment protocols by disclosing to independent auditors the identities and locations of the mines from which it sources Conflict Minerals and (ii) the independent auditor verifies separately that the smelter's or refiner's Conflict Minerals originated from conflict-free sources. The RMAP's Conformant Smelter List includes the names, locations and links to conflict minerals policies of all smelters and refiners deemed "conformant" with the RMAP's assessment protocols. Smelters and refiners labeled as "RMAP Active" have committed to undergo a RMAP audit but have not yet completed their audit or are participating in other cross-recognized certification programs. "RMAP Active" smelters and refiners may be at various stages of the audit cycle, anywhere from completion of the necessary documents to scheduling the audit date to enacting corrective actions in the post-audit phase, but may not retain their "active" status if they are unresponsive to requests for re-audit or corrective action past a certain time.

The Company also uses good faith efforts to identify the country of origin information from the smelters and refiners provided by our suppliers on the Supplier List through the Conflict Minerals Reporting Template.

3. Design and Implement Strategies to Respond to Identified Risks

Participate in Existing Industry Conflict Minerals Initiatives; Devise, Adopt and Implement a Risk Management Plan; Monitor Risk Mitigation Efforts

In light of the complexity of the Company's and our suppliers' supply chains, the Company is currently unable to assess adequately the risk that Conflict Minerals exist in our Covered Products or whether they finance armed conflict in the DRC. However, the Company engages annually with suppliers to obtain current, accurate and complete information about our supply chains through the use of the Conflict Minerals Reporting Template and to promote "conformant" supply chains through our RMI membership. As a risk mitigation measure, the Company generally requires, through our supplier code of conduct, that suppliers of Covered Products report on Conflict Minerals.

Report Findings to Designated Senior Management and to the Board

The members of the Company's internal Conflict Minerals team (consisting of senior members of the Company's supply chain and procurement operations and the legal department) provide a report summarizing the findings from our due diligence efforts to the senior management of the Company and the Audit Committee of EchoStar's Board of Directors.

4. Carry Out Independent Third-Party Audits of Smelters/Refiners

Due to our downstream position in the supply chain, the Company does not have a direct relationship with smelters and refiners. Further, the complexity of our supply chain and the many third parties involved between the ultimate manufacturer of our Covered Products and the original sources of the Conflict Minerals hinders the Company's ability to perform direct audits of smelters and refiners in our supply chain. Instead, we rely upon third party audits of smelters and refiners as part of the RMI's RMAP, an audit program designed to validate smelters' and refiners' sourcing

practices. The RMAP's audit process is discussed above in more detail in "Identify and Assess the Risks in the Company's Supply Chain."

Additionally, through our RMI membership, we support the further development and implementation of due diligence practices and tools, such as the Conflict Minerals Reporting Template and the RMAP.

5. Report Annually on Supply Chain Due Diligence

The Company has filed with the Securities and Exchange Commission our Form SD, which includes this Report as Exhibit 1.01, for the reporting period of January 1 to December 31, 2019. In accordance with the OECD Guidance and the Rule, this Report is available on our website at <http://ir.echostar.com/financial-information/sec-filings>.

PART III. DESCRIPTION OF DUE DILIGENCE MEASURES PERFORMED; RESULTS OF OUR DUE DILIGENCE MEASURES

Inherent Limitations on Due Diligence Measures

As a downstream purchaser of products which contain conflict minerals, our due diligence measures can provide only reasonable, not absolute, assurance regarding the source and chain of custody of Conflict Minerals. Our due diligence processes are based on the necessity of seeking data from our direct suppliers and those suppliers seeking similar information within their supply chains to identify the original sources of Conflict Minerals. We also rely, to a large extent, on information collected and provided by responsible mineral sourcing validation programs. Such sources of information may yield inaccurate or incomplete information and may be subject to fraud.

Another complicating factor is the unavailability of country of origin and chain of custody information from our suppliers on a continuous, real-time basis. The supply chain of commodities such as conflict minerals is a multi-step process operating more or less on a daily basis, with ore being delivered to smelters and refiners, with smelters and refiners smelting or refining ores into metal containing derivatives such as ingots, with the derivatives being shipped, sold and stored in numerous market locations around the world and with distributors and purchasers holding varying amounts of the derivatives in inventory for use. Since we do not have direct contractual relationships with smelters and refiners, we rely on our direct suppliers and the entire supply chain to gather and provide specific information about the date when the ore is smelted into a derivative and later shipped, stored, sold and first entered the stream of commerce.

Compilation and Analysis of Responses

For the reporting period of January 1 to December 31, 2019, the Company identified approximately 446 relevant suppliers. In the fourth quarter of 2019 and the first quarter of 2020, the Company sent each such supplier on the Supplier List a letter requesting completion of the Conflict Minerals Reporting Template. The Company followed up with suppliers that did not respond to the request by the specified date or that submitted incomplete or inaccurate requests.

The Company received responses from 440, or approximately 99%, of the solicited suppliers, including completed Conflict Minerals Reporting Templates from 332, or approximately 74%, of the solicited suppliers. Through the use of the Conflict Minerals Response Database and access to the RMAP information, we were able to identify the smelters and refiners for the suppliers who submitted completed templates that we believe were used to process the Conflict Minerals contained in our Covered Products as set forth in Annex I attached to this Report, as well as to identify which of those smelters and refiners for the suppliers who submitted completed templates were "RMAP Conformant" or "RMAP Active."

Based on the Conflict Minerals Reporting Templates the Company received and information otherwise obtained by the Company during the due diligence process regarding smelters and refiners for the suppliers who submitted such templates, the following table sets forth the number of "RMAP Conformant" and "RMAP Active" smelters and refiners in our supply chain for each of the Conflict Minerals used in our Covered Products:

Conflict Mineral	RMAP Conformant Smelters or Refiners	RMAP Active Smelters or Refiners
Gold	107	1
Tantalum	37	1
Tin	47	1
Tungsten	43	4

As discussed in “Part II. Design of Our Due Diligence Analysis” above, the Company relies on the completed Conflict Minerals Reporting Templates received from our suppliers as our main source of documentation supporting the representations made by such suppliers regarding the source and chain of custody of relevant Conflict Minerals in our Covered Products during the reporting period. The smelters and refiners identified in Annex I to this Report were identified by such suppliers and the Company cannot be certain that these smelters and refiners were in fact in the Company’s supply chain for our Covered Products.

Country of Origin of the Conflict Minerals in the Covered Products

Based on the Conflict Minerals Reporting Templates the Company received and information otherwise obtained by the Company during the due diligence process regarding smelters and refiners for the suppliers who submitted such templates, the Company does not have sufficient information, with respect to our Covered Products, to determine the country of origin of all of the Conflict Minerals in all of our Covered Products. However, based on the information obtained through our reasonable country of origin inquiry and our due diligence efforts (comprised of the Conflict Minerals Reporting Templates the Company received and information otherwise obtained by the Company during the due diligence process regarding smelters and refiners for the suppliers who submitted such templates), the Company has reasonably determined that countries of origin of the Conflict Minerals in the Covered Products, to the extent known, included Burundi, Central African Republic, the Democratic Republic of the Congo, Rwanda, Tanzania and Uganda.

Facilities Used to Process the Conflict Minerals in the Covered Products

Based on the Conflict Minerals Reporting Templates the Company received and information otherwise obtained by the Company during the due diligence process regarding smelters and refiners for the suppliers who submitted such templates, the Company was unable to identify with certainty all of the facilities used to process the Conflict Minerals in our Covered Products. However, based on the information obtained through our reasonable country of origin inquiry and our due diligence efforts (comprised of the Conflict Minerals Reporting Templates the Company received and information otherwise obtained by the Company during the due diligence process regarding smelters and refiners for the suppliers who submitted such templates), the Company has reasonably determined that the facilities that were used to process the Conflict Minerals contained in our Covered Products are believed to include the smelters and refiners listed in Annex I attached to this Report. The smelters and refiners that the Company has been able to determine as “RMAP Conformant” and “RMAP Active” are identified in Annex I. However, as discussed above, the smelters and refiners identified in Annex I to this Report were identified by suppliers and the Company cannot be certain that these smelters and refiners were in fact in the Company’s supply chain for our Covered Products.

PART IV. IMPLEMENTATION OF STRATEGIES TO RESPOND TO IDENTIFIED RISKS AND FUTURE STEPS

Due diligence is an ongoing, proactive and reactive process. The Company engages with our suppliers to obtain current, accurate and complete information about our supply chain. Further, reporting on Conflict Minerals is generally a requirement for our suppliers through our supplier code of conduct. The Company has used our RMI membership to gain a better understanding of the smelters and refiners in our supply chain and their RMAP compliance status, and we intend to continue to take advantage of the resources available to RMI members with regard to conformant sourcing.

CURRENTLY KNOWN SMELTER AND REFINERY LIST

Metal	Smelter Name	Country of Smelter Facility
Gold	8853 S.p.A.	Italy*
Gold	Abington Reldan Metals, LLC	United States Of America
Gold	Advanced Chemical Company	United States Of America*
Gold	African Gold Refinery	Uganda
Gold	Aida Chemical Industries Co., Ltd.	Japan*
Gold	Al Etihad Gold Refinery DMCC	United Arab Emirates*
Gold	Allgemeine Gold-und Silberscheideanstalt A.G.	Germany*
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	Aurubis AG	Germany*
Gold	AU Traders and Refiners	South Africa*
Gold	Bangalore Refinery	India*
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	Philippines*
Gold	Boliden AB	Sweden*
Gold	Caridad	Mexico
Gold	CCR Refinery - Glencore Canada Corporation	Canada*
Gold	Cendres + Metaux S.A.	Switzerland*
Gold	CGR Metalloys Pvt Ltd.	India
Gold	C. Hafner GmbH + Co. KG	Germany*
Gold	Chimet S.p.A.	Italy*
Gold	Chugai Mining	Japan*
Gold	Daye Non-Ferrous Metals Mining Ltd.	China
Gold	Degussa Sonne / Mond Goldhandel GmbH	Germany
Gold	Dijllah Gold Refinery FZC	United Arab Emirates
Gold	DODUCO Contacts and Refining GmbH	Germany*
Gold	Dowa	Japan*
Gold	DSC (Do Sung Corporation)	Korea, Republic Of*
Gold	DS PRETECH Co., Ltd.	Korea, Republic Of*
Gold	Eco-System Recycling Co., Ltd. East Plant	Japan*
Gold	Eco-System Recycling Co., Ltd. North Plant	Japan*
Gold	Eco-System Recycling Co., Ltd. West Plant	Japan*
Gold	Emirates Gold DMCC	United Arab Emirates*
Gold	Fidelity Printers and Refiners Ltd.	Zimbabwe
Gold	Fujairah Gold FZC	United Arab Emirates
Gold	GCC Gujrat Gold Centre Pvt. Ltd.	India
Gold	Geib Refining Corporation	United States Of America*
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
Gold	Guoda Safina High-Tech Environmental Refinery Co., Ltd.	China

* RMAP Conformant

**RMAP Active—in the process of becoming RMAP Conformant.

Metal	Smelter Name	Country of Smelter Facility
Gold	Hangzhou Fuchunjiang Smelting Co., Ltd.	China
Gold	Heimerle + Meule GmbH	Germany*
Gold	Heraeus Metals Hong Kong Ltd.	China*
Gold	Heraeus Precious Metals GmbH & Co. KG	Germany*
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	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	China*
Gold	International Precious Metal Refiners	United Arab Emirates
Gold	Ishifuku Metal Industry Co., Ltd.	Japan*
Gold	Istanbul Gold Refinery	Turkey*
Gold	Italpreziosi	Italy*
Gold	Japan Mint	Japan*
Gold	Jiangxi Copper Co., Ltd.	China*
Gold	JSC Ekaterinburg Non-Ferrous Metal Processing Plant	Russian Federation
Gold	JSC Uralelectromed	Russian Federation*
Gold	JX Nippon Mining & Metals Co., Ltd.	Japan*
Gold	Kaloti Precious Metals	United Arab Emirates
Gold	Kazakhmys Smelting LLC	Kazakhstan
Gold	Kazzinc	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	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 Jinyuan Tonghui Refinery Co., Ltd.	China
Gold	L'Orfebre S.A.	Andorra*
Gold	LS-NIKKO Copper Inc.	Korea, Republic Of*
Gold	LT Metal Ltd.	Korea, Republic Of*
Gold	Luoyang Zijin Yinhui Gold Refinery Co., Ltd.	China
Gold	Marsam Metals	Brazil*
Gold	Materion	United States Of America*
Gold	Matsuda Sangyo Co., Ltd.	Japan*
Gold	Metalor Technologies (Hong Kong) Ltd.	China*
Gold	Metalor Technologies S.A.	Switzerland*
Gold	Metalor Technologies (Singapore) Pte., Ltd.	Singapore*
Gold	Metalor Technologies (Suzhou) Ltd.	China*
Gold	Metalor USA Refining Corporation	United States Of America*
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	MMTC-PAMP India Pvt., Ltd.	India*
Gold	Modeltech Sdn Bhd	Malaysia
Gold	Morris and Watson	New Zealand
Gold	Moscow Special Alloys Processing Plant	Russian Federation*
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	Turkey*
Gold	Navoi Mining and Metallurgical Combinat	Uzbekistan
Gold	NH Recytech Company	Korea, Republic Of
Gold	Nihon Material Co., Ltd.	Japan*

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Metal	Smelter Name	Country of Smelter Facility
Gold	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	Austria*
Gold	Ohura Precious Metal Industry Co., Ltd.	Japan*
Gold	OJSC Novosibirsk Refinery	Russian Federation*
Gold	OJSC The Gulidov Krasnoyarsk Non-Ferrous Metals Plant (OJSC Krastsvetmet)	Russian Federation*
Gold	PAMP S.A.	Switzerland*
Gold	Pease & Curren	United States Of America
Gold	Penglai Penggang Gold Industry Co., Ltd.	China
Gold	Planta Recuperadora de Metales SpA	Chile*
Gold	Prioksky Plant of Non-Ferrous Metals	Russian Federation*
Gold	PT Aneka Tambang (Persero) Tbk	Indonesia*
Gold	PX Precinox S.A.	Switzerland*
Gold	QG Refining, LLC	United States Of America
Gold	Rand Refinery (Pty) Ltd.	South Africa*
Gold	Refinery of Seemine Gold Co., Ltd.	China
Gold	REMONDIS PMR B.V.	Netherlands*
Gold	Royal Canadian Mint	Canada*
Gold	SAAMP	France*
Gold	Sabin Metal Corp.	United States Of America
Gold	Safimet S.p.A	Italy*
Gold	SAFINA A.S.	Czechia**
Gold	Sai Refinery	India
Gold	Samduck Precious Metals	Korea, Republic Of*
Gold	Samwon Metals Corp.	Korea, Republic Of
Gold	SAXONIA Edelmetalle GmbH	Germany*
Gold	SEMPSA Joyeria Plateria S.A.	Spain*
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*
Gold	Sichuan Tianze Precious Metals Co., Ltd.	China*
Gold	Singway Technology Co., Ltd.	Taiwan, Province Of China*
Gold	SOE Shyolkovsky Factory of Secondary Precious Metals	Russian Federation*
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
Gold	Sudan Gold Refinery	Sudan
Gold	Sumitomo Metal Mining Co., Ltd.	Japan*
Gold	SungEel HiMetal Co., Ltd.	Korea, Republic Of*
Gold	Tanaka Kikinzoku Kogyo K.K.	Japan*
Gold	T.C.A S.p.A	Italy*
Gold	The Refinery of Shandong Gold Mining Co., Ltd.	China*
Gold	Tokuriki Honten Co., Ltd.	Japan*
Gold	Tongling Nonferrous Metals Group Co., Ltd.	China
Gold	Tony Goetz NV	Belgium
Gold	TOO Tau-Ken-Altyn	Kazakhstan*
Gold	Torecom	Korea, Republic Of*
Gold	Umicore Brasil Ltda.	Brazil*
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	Western Australian Mint (T/a The Perth Mint)	Australia*

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Metal	Smelter Name	Country of Smelter Facility
Gold	WIELAND Edelmetalle GmbH	Germany*
Gold	Yamakin Co., Ltd.	Japan*
Gold	Yokohama Metal Co., Ltd.	Japan*
Gold	Yunnan Copper Industry Co., Ltd.	China
Gold	Zhongkuang Gold Industry Co., Ltd.	China
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	China*
Tantalum	Asaka Riken Co., Ltd.	Japan*
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	China*
Tantalum	CP Metals Inc.	United States Of America**
Tantalum	D Block Metals, LLC	United States Of America*
Tantalum	Exotech Inc.	United States Of America*
Tantalum	FIR Metals & Resource Ltd.	China*
Tantalum	F&X Electro-Materials Ltd.	China*
Tantalum	Global Advanced Metals	United States Of America
Tantalum	Global Advanced Metals Aizu	Japan*
Tantalum	Global Advanced Metals Boyertown	United States Of America*
Tantalum	Guangdong Zhiyuan New Material Co., Ltd.	China*
Tantalum	H.C. Starck Co., Ltd.	Thailand*
Tantalum	H.C. Starck Hermsdorf GmbH	Germany*
Tantalum	H.C. Starck Inc.	United States Of America*
Tantalum	H.C. Starck Ltd.	Japan*
Tantalum	H.C. Starck Smelting GmbH & Co. KG	Germany*
Tantalum	H.C. Starck Tantalum and Niobium GmbH	Germany*
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 Blue Metals	Mexico*
Tantalum	LSM Brasil S.A.	Brazil*
Tantalum	Metallurgical Products India Pvt., Ltd.	India*
Tantalum	Mineracao Taboca S.A.	Brazil*
Tantalum	Mitsui Mining and Smelting Co., Ltd.	Japan*
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	China*
Tantalum	NPM Silmet AS	Estonia*
Tantalum	Plansee SE	Austria
Tantalum	PRG Doeel	North Macedonia, Republic Of*
Tantalum	QuantumClean	United States Of America*
Tantalum	Resind Industria e Comercio Ltda.	Brazil*
Tantalum	Solikamsk Magnesium Works OAO	Russian Federation*
Tantalum	Taki Chemical Co., Ltd.	Japan*
Tantalum	Telex Metals	United States Of America*
Tantalum	Ulba Metallurgical Plant JSC	Kazakhstan*
Tantalum	XinXing 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	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	China*
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	China*
Tin	China Tin Group Co., Ltd.	China*
Tin	Dongguan CiEXPO Environmental Engineering Co., Ltd.	China

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Metal	Smelter Name	Country of Smelter Facility
Tin	Dowa	Japan*
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	Fenix Metals	Poland*
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	Guanyang Guida Nonferrous Metal Smelting Plant	China*
Tin	HuiChang Hill Tin Industry Co., Ltd.	China*
Tin	Huichang Jinshunda Tin 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 Minerai's Metais e Ligas Ltda.	Brazil*
Tin	Malaysia Smelting Corporation (MSC)	Malaysia*
Tin	Melt Metais e Ligas S.A.	Brazil*
Tin	Metahub Industries Sdn. Bhd.	Malaysia
Tin	Metallic Resources, Inc.	United States Of America*
Tin	Metallo Belgium N.V.	Belgium*
Tin	Metallo Spain S.L.U.	Spain*
Tin	Metallum Group Holding NV	Belgium
Tin	Mineracao Taboca S.A.	Brazil*
Tin	Minsur	Peru*
Tin	Mitsubishi Materials Corporation	Japan*
Tin	Modeltech Sdn Bhd	Malaysia
Tin	Nghe Tinh Non-Ferrous Metals Joint Stock Company	Viet Nam
Tin	O.M. Manufacturing Philippines, Inc.	Philippines*
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	Thailand*
Tin	Operaciones Metalurgicas S.A.	Bolivia (Plurinational State Of)*
Tin	Pongpipat Company Limited	Myanmar
Tin	Precious Minerals and Smelting Limited	India**
Tin	PT Artha Cipta Langgeng	Indonesia*
Tin	PT ATD Makmur Mandiri Jaya	Indonesia*
Tin	PT Menara Cipta Mulia	Indonesia*
Tin	PT Mitra Stania Prima	Indonesia*
Tin	PT Refined Bangka Tin	Indonesia*
Tin	PT Timah Tbk Kundur	Indonesia*
Tin	PT Timah Tbk Mentok	Indonesia*
Tin	Resind Industria e Comercio Ltda.	Brazil*
Tin	Rui Da Hung	Taiwan, Province Of China*
Tin	Soft Metais Ltda.	Brazil*
Tin	Super Ligas	Brazil
Tin	Taicang City Nancang Metal Material Co., Ltd.	China
Tin	Thai Nguyen Mining and Metallurgy Co., Ltd.	Viet Nam*
Tin	Thaisarco	Thailand*
Tin	Tin Technology & Refining	United States Of America*
Tin	Tuyen Quang Non-Ferrous Metals Joint Stock Company	Viet Nam
Tin	White Solder Metalurgia e Mineracao Ltda.	Brazil*

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Metal	Smelter Name	Country of Smelter Facility
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	China*
Tin	Yunnan Tin Company Limited	China*
Tin	Yunnan Yunfan Non-ferrous Metals Co., Ltd.	China*
Tungsten	ACL Metais Eireli	Brazil*
Tungsten	Albasteel Industria e Comercio de Ligas Para Fundicao Ltd.	Brazil**
Tungsten	A.L.M.T. Corp.	Japan*
Tungsten	Asia Tungsten Products Vietnam Ltd.	Viet Nam*
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.	China*
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	China*
Tungsten	CNMC (Guangxi) PGMA Co., Ltd.	China
Tungsten	CP Metals Inc.	United States Of America**
Tungsten	Fujian Ganmin RareMetal Co., Ltd.	China*
Tungsten	Fujian Jinxin Tungsten Co., Ltd.	China*
Tungsten	Ganzhou Haichuang Tungsten Co., Ltd.	China*
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	China*
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	China*
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	China*
Tungsten	GEM Co., Ltd.	China
Tungsten	Global Tungsten & Powders Corp.	United States Of America*
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	China*
Tungsten	H.C. Starck Smelting GmbH & Co. KG	Germany*
Tungsten	H.C. Starck Tungsten GmbH	Germany*
Tungsten	Hunan Chenzhou Mining Co., Ltd.	China*
Tungsten	Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji	China*
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.	China*
Tungsten	Hunan Litian Tungsten Industry Co., Ltd.	China*
Tungsten	Hydrometallurg, JSC	Russian Federation*
Tungsten	Japan New Metals Co., Ltd.	Japan*
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	China*
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	China*
Tungsten	Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.	China
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	China*
Tungsten	Jiangxi Xianglu Tungsten Co., Ltd.	China**
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	China*
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	China*
Tungsten	JSC Kirovgrad Hard Alloys Plant	Russian Federation**
Tungsten	Kennametal Fallon	United States Of America*
Tungsten	Kennametal Huntsville	United States Of America*
Tungsten	KGETS Co., Ltd.	Korea, Republic Of*
Tungsten	Lianyou Metals Co., Ltd.	Taiwan, Province Of China*
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	China*
Tungsten	Masan Tungsten Chemical LLC (MTC)	Viet Nam*
Tungsten	Moliren Ltd.	Russian Federation*
Tungsten	Niagara Refining LLC	United States Of America*
Tungsten	NPP Tyazhmetprom LLC	Russian Federation
Tungsten	Philippine Chuangxin Industrial Co., Inc.	Philippines*
Tungsten	Tejing (Vietnam) Tungsten Co., Ltd.	Viet Nam*
Tungsten	Unecha Refractory metals plant	Russian Federation*
Tungsten	Wolfram Bergbau und Hutten AG	Austria*
Tungsten	WOLFRAM Company CJSC	Russian Federation
Tungsten	Woltech Korea Co., Ltd.	Korea, Republic Of*
Tungsten	Xiamen Tungsten Co., Ltd.	China*

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Metal	Smelter Name	Country of Smelter Facility
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	China*
Tungsten	Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.	China*
Tungsten	Xinhai Rendan Shaoguan Tungsten Co., Ltd.	China*
Tungsten	Zhuzhou Cemented Carbide Group Co., Ltd.	China

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