
**UNITED STATES
SECURITIES AND EXCHANGE COMMISSION**

Washington, D.C. 20549

FORM SD

Specialized Disclosure Report

Pitney Bowes Inc.

(Exact name of registrant as specified in its charter)

Delaware

(State or other jurisdiction of incorporation or organization)

1-3579

(Commission File Number)

World Headquarters

3001 Summer Street

Stamford, Connecticut 06926-0700

(Address of principal executive offices) (Zip Code)

06-0495050

(IRS Employer Identification No.)

Allison Bresloff, Director, Global Environment, Health and Safety

(203) 922-4421

(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, 2019.

Section 1 - Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

In accordance with Section 1502 of the Dodd-Frank Financial Reform and Consumer Protection Act (the “Act”) and Rule 13p-1 under the Securities and Exchange Act of 1934 (the “Rule”), Pitney Bowes Inc. (the “Company”) has determined that it is subject to the reporting requirements under the Act and the Rule and that certain products that Pitney Bowes contracted to manufacture during calendar year 2019 contain “conflict minerals” as defined in the Rule (in the form of gold and the derivatives tantalum, tin and tungsten) necessary to the functionality of those products. The Company has undertaken a reasonable inquiry into the country of origin of the conflict minerals in our products to assess whether any of those conflict minerals originated in the Democratic Republic of Congo or an “adjoining country” as defined in the Rule or were “conflict minerals from recycled or scrap sources” as defined in the Rule. To maximize efficiency, we combined our inquiry with our due diligence activities. Our inquiry and due diligence activities are described in the Conflict Minerals Report attached hereto as Exhibit 1.02.

Conflict Minerals Disclosure

A copy of Pitney Bowes Inc.’s Conflict Minerals Report filed for the calendar year ended December 31, 2019 is publicly available at <http://www.pitneybowes.com/us/our-company/corporate-responsibility>.

Item 1.02 Exhibit

Pitney Bowes Inc.’s Conflict Minerals Report for the calendar year ended December 31, 2019 is filed as Exhibit 1.02 hereto.

Section 2 - Exhibits

Item 2.01 Exhibits

[Exhibit 1.02 - Conflict Minerals Report 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 undersigned hereunto duly authorized.

Pitney Bowes Inc. (Registrant)

/s/ Daniel J. Goldstein

Daniel J. Goldstein

Executive Vice President,

Chief Legal Officer and Corporate Secretary

Dated: May 29, 2020

Exhibit 1.02

Pitney Bowes Inc. Conflict Minerals Report

(as required by Item 1.01 and 1.02 of Form SD)

Pitney Bowes Inc. ("we," "us," "our," or the "Company") submits this report pursuant to Rule 13p-1 and Form SD (the "Rule") promulgated under the Securities Exchange Act of 1934 and adopted by the Securities and Exchange Commission pursuant to Section 1502 of the Dodd-Frank Financial Reform and Consumer Protection Act (the "Act"). This report describes the inquiry the Company undertook to obtain information from internal and external sources to ascertain whether any Pitney Bowes product contains tantalum, tin, tungsten, or gold ("Conflict Minerals" or "3TG") that originated in the Democratic Republic of the Congo or adjoining countries, as defined in the Act (collectively, the "Covered Countries"), and the due diligence Pitney Bowes conducted on the source and chain of custody of such minerals. This report covers parts and products manufactured or contracted to manufacture by the Company in the 2019 calendar year. Based on our inquiry, we have found that Conflict Minerals are necessary to the functionality or production of some of our products manufactured or contracted to manufacture in 2019.

Based on our due diligence for these 2019 products, our suppliers identified a total of 296 potential smelters or refiners in their supply chains that are also identified as smelters or refiners of 3TG in the Smelter Reference List of the Responsible Minerals Initiative's ("RMI") Conflict Minerals Reporting Template ("Template"). For a list of these reported entities, please refer to Appendix A.

- 243 of these 296 smelters, or 82%, are listed as conformant or active with the Responsible Minerals Assurance Process ("RMAP") (as of November 2019) - listed in Appendix A as "Active" or "Conformant"
- 45 of these 296 smelters are engaged in the RMI process but not yet finished - listed in Appendix A as "In Communication" or "Outreach Required"
- 8 of these 296 smelters are listed as "Due Diligence Vetting Process," "Communication Suspended - Not Interested" or "Non-Conformant" in Appendix A

Further investigation performed by a reputable third party on smelters listed as "Communication Suspended - Not Interested" or "Non-Conformant" revealed that:

- 1 (Morris and Watson) is not certified as conformant to or active with an independent third-party audit program such as RMAP but claims to be a recycler and sourcing gold from New Zealand
- 1 (Abington Reldan Metals, LLC) had its status updated shortly before our follow-up investigation and is listed as a recycler
- 4 are listed as not certified as conformant to an independent third-party audit program such as RMAP, and Pitney Bowes is considering further action

Reasonable Country of Origin Inquiry

We conducted a reasonable country of origin inquiry to determine whether any of the necessary conflict minerals in our products originated in the Covered Countries or were from recycled or scrap sources. To make this determination, we focused on engaging our direct suppliers to identify the smelters and refiners of necessary conflict minerals that may have been contained in our products and that are recognized by the RMI to be processors of conflict minerals, and reviewing available information on the sourcing of conflict minerals by these smelters and refiners.

As a downstream company, we are several levels removed from mining minerals. We did not buy any minerals directly from mines, smelters, or refiners for use in these 2019 products. Information regarding the countries from which the identified smelters and refiners may source 3TG was not readily available to us and was not always provided to us by the Surveyed Suppliers (defined below). As part of our efforts to determine the mine or location of origin of 3TG in our products, we searched for publicly available information on the sourcing practices of identified smelters and refiners. In some instances, conflict mineral policies and related resources were available on the RMI website for identified smelters

and refiners that are listed as conformant with RMAP assessment protocols. However, we were unable to locate country of origin information for the Conflict Minerals processed by many of the identified smelters and refiners. In addition, many of the Surveyed Suppliers identified all of the smelters and refiners potentially associated with all of

their product offering and did not always limit the information provided to products supplied to Pitney Bowes. To the extent we located information on the potential origin of 3TG processed by these conformant smelters or refiners, we identify those countries in Appendix B. However, due to limitations discussed above, Pitney Bowes is unable to confirm whether necessary 3TG metals contained in our products in fact originated in any of these countries.

Our due diligence activities are further described in this report.

1. **Pitney Bowes' Design of Due Diligence**

A. **Due Diligence Framework**

We designed our due diligence to conform, in all material respects, with the framework set out in the "Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" and related Supplements on Tin, Tantalum and Tungsten and on Gold ("OECD Guidance"), published by the Organisation for Economic Cooperation and Development (the "OECD"). Since the Company does not buy Conflict Minerals directly from mines, smelters or refiners, we must rely on our suppliers to provide us with information regarding the source of the Conflict Minerals contained in the products and parts those suppliers provide to us. Our direct suppliers are similarly reliant upon information provided by their suppliers. In this regard, we have designed our due diligence to leverage the due diligence tools developed by RMI, including a supplier survey based on the Template, which is designed to help companies identify the smelters and refiners that process the Conflict Minerals in a company's supply chain. We have incorporated the following five-step, risk-based approach to 3TG due diligence based on OECD Guidance into the design of our Conflict Minerals due diligence program:

- establish and maintain appropriate internal management systems to identify and manage the 3TG in our global supply chain;
- identify and assess any risks associated with the use of 3TG in our supply chain by obtaining and evaluating 3TG sourcing information from suppliers;
- design and implement a strategy to respond to 3TG risks in our supply chain;
- support independent auditing of smelter and refiner due diligence practices; and
- report publicly on supply chain due diligence.

B. **Scope of Due Diligence.**

In order to determine if products manufactured or contracted to manufacture by Pitney Bowes contain 3TG sourced from Covered Countries, we sought out industry best practices, reviewed current guidance from various associations such as the OECD and the Information Technology Industry Council ("ITI"), and attended industry association meetings to assess how other multinational corporations were approaching Conflict Minerals compliance.

Working with outside consultants, we developed a Conflict Minerals survey based on the Template and guidance from the RMI and ITI. Adapting to the evolution of Pitney Bowes' portfolio of products, we identified the suppliers involved in the supply chain of our Pitney Bowes branded products. We then removed suppliers that either do not contain tin, tantalum, tungsten or gold, or otherwise supplied equipment that is out of scope. Ultimately, we sent the Conflict Minerals survey to

the 51 suppliers who (the "Surveyed Suppliers") are impacted by this rule. We asked the Surveyed Suppliers to respond with certain information, including their Conflict Minerals policies, usage of 3TG, and the smelters and refiners of Conflict Minerals in their supply chains.

The Surveyed Suppliers who completed the survey were asked to attest to the accuracy of their survey responses. The Product Compliance Team (defined below) monitored supplier responses to our surveys and contacted the Surveyed Suppliers who submitted incomplete responses or who failed to respond. We requested updated submittals from the

Surveyed Suppliers that submitted responses with a less than 75% response rate from their supply chain and suppliers that listed smelters with inaccurate information. Data received from Surveyed Suppliers through March 18, 2020 have been included in this report.

We collected and tracked the survey responses in our product compliance database for consolidation, validation, and further analysis. We also generated periodic status reports to track and review our progress in data collection and evaluate which suppliers needed additional help in completing the survey.

A. Due Diligence Results for Pitney Bowes' 2019 Products

Based on our due diligence, we determined that Conflict Minerals were necessary to the functionality or production of various products from our hardware product offerings list, which includes a varied array of equipment that processes direct mail and/or enables transactional mail management and analytics that we manufactured or contracted to manufacture in 2019.

Some examples of these products include: postage meters, low-/medium-/high-volume mailing systems that can weigh, seal and apply postage to envelopes; inserters; folders; mail openers; tabbers; scales; printers; accessories; and peripherals.

B. Pitney Bowes' Conflict Minerals Disclosure Posting

We have made public our activities related to Conflict Minerals in our Corporate Responsibility Report and have posted this Conflict Minerals Report to our website (follow this link and click on the Clients and Suppliers tab: [Pitney Bowes Corporate Responsibility](#)).¹

2. Pitney Bowes' Due Diligence Measures Undertaken for 2019 Products

In an effort to continue to identify and mitigate any risk that the use of 3TG in our products going forward may benefit armed groups in the Covered Countries, we have incorporated the relevant aspects of the OECD Guidance (as summarized in the sections that follow) into our risk management program for product stewardship requirements (including Conflict Minerals).

A. Development of an Internal, Strong Management System.

1. High level management oversight

In order to provide effective management support for, and high level escalation of issues relating to, the Company's overall supply chain due diligence efforts (inclusive of conflict minerals), we formed two cross-functional teams: the Environmental Product Compliance Team (the "Product Compliance Team") and the Environmental Committee (the "Environmental Committee").

The Product Compliance Team is comprised of representatives from Procurement, Supply Chain, Quality, Engineering, Environmental Health and Safety ("EHS"), and Global Product Line Management and other support groups. This team is responsible for assisting the Company in meeting the requirements of global product-compliance regulations.

¹ References to our website and information available through this website are not incorporated by reference herein unless otherwise noted.

The Environmental Committee is made up of departmental managers holding senior positions in various departments in the company including: Procurement, Global Supply Chain, Engineering, EHS, Quality, Ethics and Compliance, Legal, Global Product Line Management, Enterprise Risk and Internal Audit and oversees the work of the Product Compliance Team. The Environmental Committee is tasked with providing guidance regarding environmental product compliance, authorizing the financial and human resources needed for product compliance, and enforcing corrective action measures within Company operations and within our supply chain. Members of the Environmental Committee report potential issues and company risks to the Enterprise Risk Management team. The Enterprise Risk Management team, comprised of members of senior management from various functions and business units, reviews the Company's efforts in managing a wide range of risks of the Company.

1. Pitney Bowes' Conflict Minerals policy and procedures

We established a conflict minerals policy to guide our communications with and expectations for suppliers regarding Conflict Minerals. It is the Company's goal that we will not knowingly manufacture or contract to manufacture products that include Conflict Minerals that originate from the Covered Countries, unless they were processed by smelters and refiners that are certified as responsible or came from recycled or scrap sources. We communicated our expectation that our Surveyed Suppliers source products, parts and components from socially responsible sources and conduct reasonable due diligence on their supply chains in an effort to assure that Conflict Minerals are not knowingly sourced from the Covered Countries unless they were processed by smelters and refiners that are conformant with the RMAP or came from recycled or scrap sources.

We adopted and periodically review certain procedures and maintain the following steps regarding our use of 3TG:

- Our Supplier Code of Conduct describes our Conflict Minerals and other product compliance requirements;
- Our engineering standards and specifications include requirements to specify that suppliers must meet Section 1502(4) of the Dodd Frank Act;
- Our Quality Assurance audit templates include supplier requirements with respect to products containing 3TG;
- Incorporated consideration of conflict mineral issues within the Pitney Bowes Product Review Process
- Periodically update and distribute to all suppliers our contractual language regarding certification that 3TG from Covered Countries is conflict free or came from recycled or scrap sources;
- Annually publish Conflict Minerals information on our website and in our Corporate Responsibility Report;
- Include Conflict Minerals in Enterprise Risk Management meetings to ensure regular review by our management;
- Include review of Conflict Minerals supply chain data and related processes to the Company's standardized environmental compliance reviews of key suppliers;
- Complete training classes through our learning management system and via video-conference and in person classes in order to educate relevant employees, where necessary;
- Educate Suppliers and other partners regarding Conflict Minerals during business reviews, where necessary;
- Continue to require Surveyed Suppliers to complete surveys with the goal of identifying the smelters and refineries used to process Conflict Minerals in their supply chain;
- Maintain internal policies, written procedures, tools and training to ensure effective implementation of our Conflict Minerals management program;

- Track and report supplier data in a product compliance information database and
- Manage a supplier escalation protocol to ensure consistent and thorough management of unresponsive suppliers when needed - this protocol documents our supplier engagement and how we interact with unresponsive suppliers or suppliers who provide incomplete, questionable, or indeterminable information.

2. Pitney Bowes' system of controls and transparency over the 3TG supply chain

As part of the Company's broader requirement that our suppliers provide us with accurate and complete information relating to the sources of all substances contained in any product, part or component they provide to us, we required that Surveyed Suppliers provide us with information on Conflict Minerals contained in such products, parts, or components.

Surveyed Suppliers who failed to respond to our request for data were subject to additional evaluation to determine whether further engagement or escalation was necessary.

3. Pitney Bowes' engagement with suppliers

The Company has multiple methods to encourage our suppliers to commit to our policies requiring responsible supplier operations. We have communicated our Conflict Minerals requirements to our Suppliers and other product stewardship requirements, as applicable, to our global supply chain. In connection with our data collection efforts, we have explained to our Suppliers our requirements that they conduct their operations as socially responsible suppliers. In addition, we have revised our supplier form contract wording to include compliance with our Conflict Minerals efforts. Our supplier contracts have long contained provisions giving us the right to conduct unannounced visits to supplier sites and to request documentation to confirm the supplier's compliance with our policies and contractual requirements. Our Surveyed Suppliers have received information regarding Conflict Minerals requirements and completion of our product compliance database.

4. Pitney Bowes' Company-level grievance mechanism

For many years, Pitney Bowes has maintained an Ethics Help Line which is available toll-free, 24 hours a day, seven days a week. The Ethics Help Line is operated by an outside firm and enables employees, clients and others to make inquiries and report concerns about potential violations of Company policy or the law, in many languages, without fear of retaliation. Anyone can contact the Ethics Help Line to report any concerns about Conflict Minerals that may be contained in our products.

B. Identification and Assessment of Risk in Our Supply Chain.

The Company continues its program of conducting supply chain due diligence and risk assessment on supplier sources of 3TGs as described above in Section 1.

C. Strategy for Responding to Identified Risks in Our 3TG Supply Chain.

As described above, the Product Compliance Team monitored supplier responses to our surveys and contacted Surveyed Suppliers who submitted incomplete responses or who failed to respond so that we could understand what was preventing them from submitting a full and final attestation regarding their product line. The Product Compliance Team also reviewed the data from the product compliance database to determine which Surveyed Suppliers had data gaps, had raised questions or had not been responsive. Any Surveyed Suppliers that were considered non-responsive or higher risk were escalated to designated internal teams and management for further evaluation as they were identified.

We also reported the findings and information gathered through our inquiry and due diligence to Pitney Bowes senior management.

D. Support for Independent Third-party Audits of Supply Chain Due Diligence

Since we do not have direct relationships with smelters or refiners, we did not perform direct audits of these entities' supply

chains of Conflict Minerals. However, we supported the development and implementation of smelter and refinery sourcing audits conducted by independent third parties and industry groups, such as the RMI's RMAP, through our conflict minerals policy and expectations regarding responsible sourcing of minerals from the Covered Countries.

3. Future Actions to Further Minimize Any Risk of Conflict Minerals Benefitting Armed Groups

The Company will continue to request information from our supply chain in order to meet the requirements of the Rule. Where there is reason to believe that a supplier is not adopting a Conflict Minerals policy or providing the necessary data to us, we will work with the supplier to address the issue. In the event of continued supplier deficiencies, we will consider appropriate measures including, if and as appropriate, termination of our relationship with a supplier.

Appendix A

List of Smelters / Refiners Identified by the Surveyed Suppliers

The following list provides the name, location and status of smelters and refiners identified by the Surveyed Suppliers. Pitney Bowes is unable to confirm that any or all smelters and refiners in this list processed the necessary 3TG metals contained in our products, since a number of the Surveyed Suppliers identified all smelters and refiners in their total supply chain and did not limit their responses to the specific products supplied to Pitney Bowes.

Smelter and refiner names and locations were drawn from the Smelter Reference List in the latest version of the Conflict Minerals Reporting Template ("Template"). Smelter and refiner status is based on information available to Pitney Bowes as of November 2019. "Conformant" means listed by Responsible Minerals Initiative ("RMI") as conformant with Responsible Minerals Assurance Process ("RMAP") assessment protocols; "Active" means listed by RMI as having committed to undergo an audit or as participating in a similar assessment program such as the LBMA Responsible Gold Certification or Responsible Jewelry Council's Chain-of-Custody Certification. Smelters or refiners listed as "In Communication" or "Outreach Required" have begun discussions with or will be encouraged to participate in the RMAP audit. Smelters and refiners designated by RMI as "Non-Conformant", "Communication Suspended - Not Interested", and "Due Diligence Vetting Process" are not currently conformant with RMAP assessment protocols and/or are not currently progressing toward participation in an audit. Entities that are no longer recognized as smelters or refiners are not included in the reference list below (for example, if they are no longer included in the Smelter Reference List of RMI's Template based on RMI's determination that the entity did not actually engage in smelting or refining activities or if we or RMI believe they are no longer in operation).

| Metal | Smelter /Refiner Name | RMI Audit Status | Smelter/Refiner Location |
|--------------|---|-------------------------------|---------------------------------|
| Gold | 8853 S.p.A. | Conformant | ITALY |
| Gold | Abington Reldan Metals, LLC | Non-Conformant | UNITED STATES OF AMERICA |
| Gold | Advanced Chemical Company | Conformant | UNITED STATES OF AMERICA |
| Gold | African Gold Refinery | Outreach Required | UGANDA |
| Gold | Aida Chemical Industries Co., Ltd. | Conformant | JAPAN |
| Gold | Al Etihad Gold Refinery DMCC | Conformant | UNITED ARAB EMIRATES |
| Gold | Allgemeine Gold-und Silberscheideanstalt A.G. | Conformant | GERMANY |
| Gold | Almalyk Mining and Metallurgical Complex (AMMC) | Conformant | UZBEKISTAN |
| Gold | AngloGold Ashanti Corrego do Sitio Mineracao | Conformant | BRAZIL |
| Gold | Argor-Heraeus S.A. | Conformant | SWITZERLAND |
| Gold | Asahi Pretec Corp. | Conformant | JAPAN |
| Gold | Asahi Refining Canada Ltd. | Conformant | CANADA |
| Gold | Asahi Refining USA Inc. | Conformant | UNITED STATES OF AMERICA |
| Gold | Asaka Riken Co., Ltd. | Conformant | JAPAN |
| Gold | Atasay Kuyumculuk Sanayi Ve Ticaret A.S. | Due Diligence Vetting Process | TURKEY |
| Gold | AU Traders and Refiners | Conformant | SOUTH AFRICA |
| Gold | Aurubis AG | Conformant | GERMANY |
| Gold | Bangalore Refinery | Conformant | INDIA |
| Gold | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | Conformant | PHILIPPINES |
| Gold | Boliden AB | Conformant | SWEDEN |

| | | | |
|------|--|---|-----------------------------|
| Gold | C. Hafner GmbH + Co. KG | Conformant | GERMANY |
| Gold | Caridad | Communication Suspended - Not Interested | MEXICO |
| Gold | CCR Refinery - Glencore Canada Corporation | Conformant | CANADA |
| Gold | Cendres + Metaux S.A. | Conformant | SWITZERLAND |
| Gold | CGR Metalloys Pvt Ltd. | Outreach Required | INDIA |
| Gold | Chimet S.p.A. | Conformant | ITALY |
| Gold | Chugai Mining | Conformant | JAPAN |
| Gold | Daye Non-Ferrous Metals Mining Ltd. | In Communication | CHINA |
| Gold | Degussa Sonne / Mond Goldhandel GmbH | Outreach Required | GERMANY |
| Gold | Dijllah Gold Refinery FZC | In Communication | UNITED ARAB EMIRATES |
| Gold | DODUCO Contacts and Refining GmbH | Conformant | GERMANY |
| Gold | Dowa | Conformant | JAPAN |
| Gold | DS PRETECH Co., Ltd. | Conformant | KOREA, REPUBLIC OF |
| Gold | DSC (Do Sung Corporation) | Conformant | KOREA, REPUBLIC OF |
| Gold | Eco-System Recycling Co., Ltd. | Conformant | JAPAN |
| Gold | Eco-System Recycling Co., Ltd. North Plant | Conformant | JAPAN |
| Gold | Eco-System Recycling Co., Ltd. West Plant | Conformant | JAPAN |
| Gold | Emirates Gold DMCC | Conformant | UNITED ARAB EMIRATES |
| Gold | Fidelity Printers and Refiners Ltd. | Due Diligence Vetting Process | ZIMBABWE |
| Gold | Fujairah Gold FZC | Outreach Required | UNITED ARAB EMIRATES |
| Gold | GCC Gujrat Gold Centre Pvt. Ltd. | Outreach Required | INDIA |
| Gold | Geib Refining Corporation | Conformant | UNITED STATES OF AMERICA |
| Gold | Gold Refinery of Zijin Mining Group Co., Ltd. | Conformant | CHINA |
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM | Outreach Required | CHINA |
| Gold | Guangdong Jinding Gold Limited | Outreach Required | CHINA |
| Gold | Guoda Safina High-Tech Environmental Refinery Co., Ltd. | Outreach Required | CHINA |
| Gold | Hangzhou Fuchunjiang Smelting Co., Ltd. | Outreach Required | CHINA |
| Gold | HeeSung Metal Ltd. | Conformant | KOREA, REPUBLIC OF |
| Gold | Heimerle + Meule GmbH | Conformant | GERMANY |
| Gold | Heraeus Metals Hong Kong Ltd. | Conformant | CHINA |
| Gold | Heraeus Precious Metals GmbH & Co. KG | Conformant | GERMANY |
| Gold | Hunan Chenzhou Mining Co., Ltd. | Outreach Required | CHINA |
| Gold | Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd. | Outreach Required | CHINA |
| Gold | Hwasung CJ Co., Ltd. | Communication Suspended - Not Interested | KOREA, REPUBLIC OF |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | Conformant | CHINA |
| Gold | International Precious Metal Refiners | Outreach Required | UNITED ARAB EMIRATES |

| | | | |
|------|---|--|--------------------------|
| Gold | Ishifuku Metal Industry Co., Ltd. | Conformant | JAPAN |
| Gold | Istanbul Gold Refinery | Conformant | TURKEY |
| Gold | Italpreziosi | Conformant | ITALY |
| Gold | Japan Mint | Conformant | JAPAN |
| Gold | Jiangxi Copper Co., Ltd. | Conformant | CHINA |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant | Conformant | RUSSIAN FEDERATION |
| Gold | JSC Uralelectromed | Conformant | RUSSIAN FEDERATION |
| Gold | JX Nippon Mining & Metals Co., Ltd. | Conformant | JAPAN |
| Gold | Kaloti Precious Metals | Outreach Required | UNITED ARAB EMIRATES |
| Gold | Kazakhmys Smelting LLC | In Communication | KAZAKHSTAN |
| Gold | Kazzinc | Conformant | KAZAKHSTAN |
| Gold | Kennecott Utah Copper LLC | Conformant | UNITED STATES OF AMERICA |
| Gold | KGHM Polska Miedz Spolka Akcyjna | Conformant | POLAND |
| Gold | Kojima Chemicals Co., Ltd. | Conformant | JAPAN |
| Gold | Korea Zinc Co., Ltd. | Conformant | KOREA, REPUBLIC OF |
| Gold | Kyrgyzaltyn JSC | Conformant | KYRGYZSTAN |
| Gold | Kyshtym Copper-Electrolytic Plant ZAO | Outreach Required | RUSSIAN FEDERATION |
| Gold | L'azurde Company For Jewelry | Outreach Required | SAUDI ARABIA |
| Gold | Lingbao Gold Co., Ltd. | Outreach Required | CHINA |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd. | Outreach Required | CHINA |
| Gold | L'Orfebre S.A. | Conformant | ANDORRA |
| Gold | LS-NIKKO Copper Inc. | Conformant | KOREA, REPUBLIC OF |
| Gold | Luoyang Zijin Yinhuai Gold Refinery Co., Ltd. | Outreach Required | CHINA |
| Gold | Marsam Metals | Conformant | BRAZIL |
| Gold | Materion | Conformant | UNITED STATES OF AMERICA |
| Gold | Matsuda Sangyo Co., Ltd. | Conformant | JAPAN |
| Gold | Metalor Technologies (Hong Kong) Ltd. | Conformant | CHINA |
| Gold | Metalor Technologies (Singapore) Pte., Ltd. | Conformant | SINGAPORE |
| Gold | Metalor Technologies (Suzhou) Ltd. | Conformant | CHINA |
| Gold | Metalor Technologies S.A. | Conformant | SWITZERLAND |
| Gold | Metalor USA Refining Corporation | Conformant | UNITED STATES OF AMERICA |
| Gold | Metalurgica Met-Mex Penoles S.A. De C.V. | Conformant | MEXICO |
| Gold | Mitsubishi Materials Corporation | Conformant | JAPAN |
| Gold | Mitsui Mining and Smelting Co., Ltd. | Conformant | JAPAN |
| Gold | MMTC-PAMP India Pvt., Ltd. | Conformant | INDIA |
| Gold | Modeltech Sdn Bhd | Active | MALAYSIA |
| Gold | Morris and Watson | Communication Suspended - Not Interested | NEW ZEALAND |
| Gold | Moscow Special Alloys Processing Plant | Conformant | RUSSIAN FEDERATION |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.S. | Conformant | TURKEY |
| Gold | Navoi Mining and Metallurgical Combinat | Outreach Required | UZBEKISTAN |

| | | | |
|------|---|--|---------------------------|
| Gold | NH Recytech Company | Active | KOREA, REPUBLIC OF |
| Gold | Nihon Material Co., Ltd. | Conformant | JAPAN |
| Gold | Ogussa Osterreichische Gold- und Silber- Scheideanstalt GmbH | Conformant | AUSTRIA |
| Gold | Ohura Precious Metal Industry Co., Ltd. | Conformant | JAPAN |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | Conformant | RUSSIAN FEDERATION |
| Gold | OJSC Novosibirsk Refinery | Conformant | RUSSIAN FEDERATION |
| Gold | PAMP S.A. | Conformant | SWITZERLAND |
| Gold | Pease & Curren | Outreach Required | UNITED STATES OF AMERICA |
| Gold | Penglai Penggang Gold Industry Co., Ltd. | Outreach Required | CHINA |
| Gold | Planta Recuperadora de Metales SpA | Conformant | CHILE |
| Gold | Prioksky Plant of Non-Ferrous Metals | Conformant | RUSSIAN FEDERATION |
| Gold | PT Aneka Tambang (Persero) Tbk | Conformant | INDONESIA |
| Gold | PX Precinox S.A. | Conformant | SWITZERLAND |
| Gold | QG Refining, LLC | Outreach Required | UNITED STATES OF AMERICA |
| Gold | Rand Refinery (Pty) Ltd. | Conformant | SOUTH AFRICA |
| Gold | Refinery of Seemine Gold Co., Ltd. | Outreach Required | CHINA |
| Gold | REMONDIS PMR B.V. | Conformant | NETHERLANDS |
| Gold | Royal Canadian Mint | Conformant | CANADA |
| Gold | SAAMP | Conformant | FRANCE |
| Gold | Sabin Metal Corp. | Outreach Required | UNITED STATES OF AMERICA |
| Gold | Safimet S.p.A | Conformant | ITALY |
| Gold | SAFINA A.S. | Active | CZECH REPUBLIC |
| Gold | Sai Refinery | Outreach Required | INDIA |
| Gold | Samduck Precious Metals | Conformant | KOREA, REPUBLIC OF |
| Gold | Samwon Metals Corp. | Communication Suspended - Not Interested | KOREA, REPUBLIC OF |
| Gold | SAXONIA Edelmetalle GmbH | Conformant | GERMANY |
| Gold | SEMPSA Joyeria Plateria S.A. | Conformant | SPAIN |
| Gold | Shandong Humon Smelting Co., Ltd. | Outreach Required | CHINA |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | Outreach Required | CHINA |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd. | Conformant | CHINA |
| Gold | Sichuan Tianze Precious Metals Co., Ltd. | Conformant | CHINA |
| Gold | Singway Technology Co., Ltd. | Conformant | TAIWAN, PROVINCE OF CHINA |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals | Conformant | RUSSIAN FEDERATION |
| Gold | Solar Applied Materials Technology Corp. | Conformant | TAIWAN, PROVINCE OF CHINA |
| Gold | Sovereign Metals | Outreach Required | INDIA |
| Gold | State Research Institute Center for Physical Sciences and Technology | Outreach Required | LITHUANIA |

| | | | |
|----------|---|-------------------|--------------------------|
| Gold | Sudan Gold Refinery | Outreach Required | SUDAN |
| Gold | Sumitomo Metal Mining Co., Ltd. | Conformant | JAPAN |
| Gold | SungEel HiMetal Co., Ltd. | Conformant | KOREA, REPUBLIC OF |
| Gold | T.C.A S.p.A | Conformant | ITALY |
| Gold | Tanaka Kikinzoku Kogyo K.K. | Conformant | JAPAN |
| Gold | The Refinery of Shandong Gold Mining Co., Ltd. | Conformant | CHINA |
| Gold | Tokuriki Honten Co., Ltd. | Conformant | JAPAN |
| Gold | Tongling Nonferrous Metals Group Co., Ltd. | Outreach Required | CHINA |
| Gold | Tony Goetz NV | Active | BELGIUM |
| Gold | TOO Tau-Ken-Altyn | In Communication | KAZAKHSTAN |
| Gold | Torecom | Conformant | KOREA, REPUBLIC OF |
| Gold | Umicore Brasil Ltda. | Conformant | BRAZIL |
| Gold | Umicore Precious Metals Thailand | Conformant | THAILAND |
| Gold | Umicore S.A. Business Unit Precious Metals Refining | Conformant | BELGIUM |
| Gold | United Precious Metal Refining, Inc. | Conformant | UNITED STATES OF AMERICA |
| Gold | Valcambi S.A. | Conformant | SWITZERLAND |
| Gold | Western Australian Mint (T/a The Perth Mint) | Conformant | AUSTRALIA |
| Gold | WIELAND Edelmetalle GmbH | Conformant | GERMANY |
| Gold | Yamakin Co., Ltd. | Conformant | JAPAN |
| Gold | Yokohama Metal Co., Ltd. | Conformant | JAPAN |
| Gold | Yunnan Copper Industry Co., Ltd. | Outreach Required | CHINA |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | Conformant | CHINA |
| Tantalum | Asaka Riken Co., Ltd. | Conformant | JAPAN |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd. | Conformant | CHINA |
| Tantalum | CP Metals Inc. | Active | UNITED STATES OF AMERICA |
| Tantalum | D Block Metals, LLC | Conformant | UNITED STATES OF AMERICA |
| Tantalum | Exotech Inc. | Conformant | UNITED STATES OF AMERICA |
| Tantalum | F&X Electro-Materials Ltd. | Conformant | CHINA |
| Tantalum | FIR Metals & Resource Ltd. | Conformant | CHINA |
| Tantalum | Global Advanced Metals Aizu | Conformant | JAPAN |
| Tantalum | Global Advanced Metals Boyertown | Conformant | UNITED STATES OF AMERICA |
| Tantalum | Guangdong Zhiyuan New Material Co., Ltd. | Conformant | CHINA |
| Tantalum | H.C. Starck Co., Ltd. | Conformant | THAILAND |
| Tantalum | H.C. Starck Hermsdorf GmbH | Conformant | GERMANY |
| Tantalum | H.C. Starck Inc. | Conformant | UNITED STATES OF AMERICA |
| Tantalum | H.C. Starck Ltd. | Conformant | JAPAN |
| Tantalum | H.C. Starck Smelting GmbH & Co. KG | Conformant | GERMANY |
| Tantalum | H.C. Starck Tantalum and Niobium GmbH | Conformant | GERMANY |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd. | Conformant | CHINA |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd. | Conformant | CHINA |

| | | | |
|----------|---|-------------------|--|
| Tantalum | Jiangxi Tuohong New Raw Material | Conformant | CHINA |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd. | Conformant | CHINA |
| Tantalum | Jiujiang Tanbre Co., Ltd. | Conformant | CHINA |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd. | Conformant | CHINA |
| Tantalum | KEMET Blue Metals | Conformant | MEXICO |
| Tantalum | KEMET Blue Powder | Conformant | UNITED STATES OF AMERICA |
| Tantalum | LSM Brasil S.A. | Conformant | BRAZIL |
| Tantalum | Metallurgical Products India Pvt., Ltd. | Conformant | INDIA |
| Tantalum | Mineracao Taboca S.A. | Conformant | BRAZIL |
| Tantalum | Mitsui Mining and Smelting Co., Ltd. | Conformant | JAPAN |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd. | Conformant | CHINA |
| Tantalum | NPM Silmet AS | Conformant | ESTONIA |
| Tantalum | Power Resources Ltd. | Conformant | MACEDONIA, THE FORMER YUGOSLAV REPUBLIC OF |
| Tantalum | QuantumClean | Conformant | UNITED STATES OF AMERICA |
| Tantalum | Resind Industria e Comercio Ltda. | Conformant | BRAZIL |
| Tantalum | RFH Tantalum Smeltery Co., Ltd./Yanling Jincheng Tantalum & Niobium Co., Ltd. | Conformant | CHINA |
| Tantalum | Solikamsk Magnesium Works OAO | Conformant | RUSSIAN FEDERATION |
| Tantalum | Taki Chemical Co., Ltd. | Conformant | JAPAN |
| Tantalum | Telex Metals | Conformant | UNITED STATES OF AMERICA |
| Tantalum | Ulba Metallurgical Plant JSC | Conformant | KAZAKHSTAN |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd. | Conformant | CHINA |
| Tin | Alent plc | Conformant | UNITED STATES |
| Tin | An Vinh Joint Stock Mineral Processing Company | Outreach Required | VIET NAM |
| Tin | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | Conformant | CHINA |
| Tin | Chifeng Dajingzi Tin Industry Co., Ltd. | Conformant | CHINA |
| Tin | China Tin Group Co., Ltd. | Conformant | CHINA |
| Tin | Dongguan CiEXPO Environmental Engineering Co., Ltd. | Active | CHINA |
| Tin | Dowa | Conformant | JAPAN |
| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | Active | VIET NAM |
| Tin | EM Vinto | Conformant | BOLIVIA (PLURINATIONAL STATE OF) |
| Tin | Estanho de Rondonia S.A. | In Communication | BRAZIL |
| Tin | Fenix Metals | Conformant | POLAND |
| Tin | Gejiu City Fuxiang Industry and Trade Co., Ltd. | Outreach Required | CHINA |
| Tin | Gejiu Kai Meng Industry and Trade LLC | Conformant | CHINA |
| Tin | Gejiu Non-Ferrous Metal Processing Co., Ltd. | Conformant | CHINA |
| Tin | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | Conformant | CHINA |
| Tin | Gejiu Zili Mining And Metallurgy Co., Ltd. | Conformant | CHINA |
| Tin | Guangdong Hanhe Non-Ferrous Metal Co., Ltd. | Conformant | CHINA |
| Tin | Guanyang Guida Nonferrous Metal Smelting Plant | Conformant | CHINA |
| Tin | HuiChang Hill Tin Industry Co., Ltd. | Conformant | CHINA |

| | | | |
|----------|--|-------------------|---------------------------|
| Tin | Huichang Jinshunda Tin Co., Ltd. | Conformant | CHINA |
| Tin | Jiangxi New Nanshan Technology Ltd. | Conformant | CHINA |
| Tin | Ma'anshan Weitai Tin Co., Ltd. | Conformant | CHINA |
| Tin | Magnu's Mineraias Metais e Ligas Ltda. | Conformant | BRAZIL |
| Tin | Malaysia Smelting Corporation (MSC) | Conformant | MALAYSIA |
| Tin | Melt Metais e Ligas S.A. | Conformant | BRAZIL |
| Tin | Metallic Resources, Inc. | Conformant | UNITED STATES OF AMERICA |
| Tin | Metallo Belgium N.V. | Conformant | BELGIUM |
| Tin | Metallo Spain S.L.U. | Conformant | SPAIN |
| Tin | Mineracao Taboca S.A. | Conformant | BRAZIL |
| Tin | Minsur | Conformant | PERU |
| Tin | Mitsubishi Materials Corporation | Conformant | JAPAN |
| Tin | Modeltech Sdn Bhd | Conformant | MALAYSIA |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company | Outreach Required | VIET NAM |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd. | Conformant | THAILAND |
| Tin | O.M. Manufacturing Philippines, Inc. | Conformant | PHILIPPINES |
| Tin | Operaciones Metalurgicas S.A. | Conformant | BOLIVIA |
| Tin | Pongpipat Company Limited | Outreach Required | MYANMAR |
| Tin | Precious Minerals and Smelting Limited | Active | INDIA |
| Tin | PT Artha Cipta Langgeng | Conformant | INDONESIA |
| Tin | PT ATD Makmur Mandiri Jaya | Conformant | INDONESIA |
| Tin | PT Mitra Stania Prima | Conformant | INDONESIA |
| Tin | PT Refined Bangka Tin | Conformant | INDONESIA |
| Tin | PT Timah Tbk Kundur | Conformant | INDONESIA |
| Tin | PT Timah Tbk Mentok | Conformant | INDONESIA |
| Tin | Resind Industria e Comercio Ltda. | Conformant | BRAZIL |
| Tin | Rui Da Hung | Conformant | TAIWAN, PROVINCE OF CHINA |
| Tin | Soft Metais Ltda. | Conformant | BRAZIL |
| Tin | Super Ligas | Outreach Required | BRAZIL |
| Tin | Super Ligas | Outreach Required | BRAZIL |
| Tin | Thai Nguyen Mining and Metallurgy Co., Ltd. | Conformant | VIET NAM |
| Tin | Thai Solder Industry Corp., Ltd. | Conformant | THAILAND |
| Tin | Tin Technology & Refining | Conformant | UNITED STATES OF AMERICA |
| Tin | Tuyen Quang Non-Ferrous Metals Joint Stock Company | Outreach Required | VIET NAM |
| Tin | White Solder Metalurgia e Mineracao Ltda. | Conformant | BRAZIL |
| Tin | Yunnan Chengfeng Non-ferrous Metals Co., Ltd. | Conformant | CHINA |
| Tin | Yunnan Tin Company Limited | Conformant | CHINA |
| Tin | Yunnan Yunfan Non-ferrous Metals Co., Ltd. | Conformant | CHINA |
| Tungsten | A.L.M.T. Corp. | Conformant | JAPAN |
| Tungsten | ACL Metais Eireli | Conformant | BRAZIL |
| Tungsten | Asia Tungsten Products Vietnam Ltd. | Conformant | VIET NAM |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd. | Conformant | CHINA |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd. | Conformant | CHINA |
| Tungsten | CNMC (Guangxi) PGMA Co., Ltd. | Outreach Required | CHINA |
| Tungsten | Fujian Ganmin RareMetal Co., Ltd. | Conformant | CHINA |

| | | | |
|----------|---|--|---------------------------|
| Tungsten | Fujian Jinxin Tungsten Co., Ltd. | Conformant | CHINA |
| Tungsten | Ganzhou Haichuang Tungsten Co., Ltd. | Conformant | CHINA |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd. | Conformant | CHINA |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd. | Conformant | CHINA |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd. | Conformant | CHINA |
| Tungsten | Global Tungsten & Powders Corp. | Conformant | UNITED STATES OF AMERICA |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd. | Conformant | CHINA |
| Tungsten | H.C. Starck Smelting GmbH & Co. KG | Conformant | GERMANY |
| Tungsten | H.C. Starck Tungsten GmbH | Conformant | GERMANY |
| Tungsten | Hunan Chenzhou Mining Co., Ltd. | Conformant | CHINA |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji | Conformant | CHINA |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd. | Conformant | CHINA |
| Tungsten | Hunan Litian Tungsten Industry Co., Ltd. | Conformant | CHINA |
| Tungsten | Hydrometallurg, JSC | Conformant | RUSSIAN FEDERATION |
| Tungsten | Japan New Metals Co., Ltd. | Conformant | JAPAN |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd. | Conformant | CHINA |
| Tungsten | Jiangxi Dayu Longxintai Tungsten Co., Ltd. | Active | CHINA |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd. | Conformant | CHINA |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. | Communication Suspended - Not Interested | CHINA |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | Conformant | CHINA |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd. | Conformant | CHINA |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd. | Conformant | CHINA |
| Tungsten | Kennametal Fallon | Conformant | UNITED STATES OF AMERICA |
| Tungsten | Kennametal Huntsville | Conformant | UNITED STATES OF AMERICA |
| Tungsten | KGETS Co., Ltd. | Conformant | KOREA, REPUBLIC OF |
| Tungsten | Lianyou Metals Co., Ltd. | Conformant | TAIWAN, PROVINCE OF CHINA |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd. | Conformant | CHINA |
| Tungsten | Masan Tungsten Chemical LLC (MTC) | Conformant | VIET NAM |
| Tungsten | Moliren Ltd. | Conformant | RUSSIAN FEDERATION |
| Tungsten | Niagara Refining LLC | Conformant | UNITED STATES OF AMERICA |
| Tungsten | Philippine Chuangxin Industrial Co., Inc. | Conformant | PHILIPPINES |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd. | Conformant | VIET NAM |
| Tungsten | Unecha Refractory metals plant | Conformant | RUSSIAN FEDERATION |
| Tungsten | Wolfram Bergbau und Hutten AG | Conformant | AUSTRIA |
| Tungsten | Woltech Korea Co., Ltd. | Conformant | KOREA, REPUBLIC OF |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd. | Conformant | CHINA |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd. | Conformant | CHINA |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd. | Conformant | CHINA |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd. | Conformant | CHINA |

APPENDIX B

Countries of Origin

Potential countries of origin for 3TG processed by conformant smelters or refiners may include (but are not necessarily limited to):

ANDORRA AUSTRALIA AUSTRIA BELGIUM BOLIVIA BRAZIL CANADA CHILE CHINA
CZECH REPUBLIC ESTONIA FRANCE GERMANY HONG KONG INDIA INDONESIA ITALY
JAPAN KAZAKHSTAN KOREA, REPUBLIC OF KYRGYZSTAN LITHUANIA
MACEDONIA, THE FORMER YUGOSLAV REPUBLIC OF MALAYSIA
MEXICO MYANMAR NETHERLANDS NEW ZEALAND PERU PHILIPPINES POLAND
RUSSIAN FEDERATION RWANDA
SAUDI ARABIA SINGAPORE SOUTH AFRICA SPAIN SUDAN SWEDEN
SWITZERLAND
TAIWAN, PROVINCE OF CHINA THAILAND
TURKEY UGANDA
UNITED ARAB EMIRATES UNITED STATES OF AMERICA UZBEKISTAN
VIET NAM ZAMBIA ZIMBABWE