

---

---

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

**FORM SD**  
Specialized Disclosure Report

---

**Mallinckrodt plc**  
(Exact name of registrant as specified in its charter)

---

**Ireland**  
(State or other jurisdiction  
of incorporation)

**001-35803**  
(Commission  
File Number)

**College Business & Technology Park, Cruiserath,  
Blanchardstown, Dublin 15, Ireland**  
(Address of principal executive offices) (Zip code)

**Mark Tyndall**  
**Executive Vice President, Chief Legal Officer and Corporate Secretary**  
**(202) 459-4147**  
(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, 2022.

---

---

---

**Section 1 - Conflict Minerals Disclosure****Item 1.01 Conflict Minerals Disclosure and Report**

Mallinckrodt plc's Conflict Minerals Report ("CMR") for the calendar year ended December 31, 2022 is filed, in accordance with Rule 13p-1 of the Securities and Exchange Act of 1934, as an Exhibit to this Specialized Disclosure Form ("Form SD") and is publicly available at [ir.mallinckrodt.com/sec-filings](http://ir.mallinckrodt.com/sec-filings). The content of any website referred to in this Form SD is included for general information only and is not incorporated by reference in this Form SD or the CMR.

**Item 1.02 Exhibit**

The CMR required by Item 1.01 is filed as Exhibit 1.01 to this Form SD.

**Section 2 – Resource Extraction Issuer Disclosure****Item 2.01 Resource Extraction Issuer Disclosure and Report**

Not applicable.

**Section 3 – Exhibits****Item 3.01 Exhibits**

[Exhibit 1.01- Conflict Minerals Report as required by Items 1.01 and 1.02 of this Form SD.](#)

---

**SIGNATURES**

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

**MALLINCKRODT PLC**

By: /s/ Mark Tyndall

Date: May 31, 2023

Name: Mark Tyndall

Title: Executive Vice President, Chief Legal Officer and Corporate Secretary

---

## Conflict Minerals Report

### Introduction

Mallinckrodt plc is a global business consisting of multiple wholly owned subsidiaries (collectively, “Mallinckrodt” or “the Company”) that develop, manufacture, market and distribute specialty pharmaceutical products and therapies. The Company’s Specialty Brands reportable segment’s areas of focus include autoimmune and rare diseases in specialty areas like neurology, rheumatology, hepatology, nephrology, pulmonology and ophthalmology and oncology; immunotherapy and neonatal respiratory critical care therapies; analgesics; cultured skin substitutes and gastrointestinal products. Its Specialty Generics reportable segment includes specialty generic drugs and active pharmaceutical ingredients.

This Conflict Minerals Report (“CMR”) for the year ended December 31, 2022 (“the Reporting Period”) is presented to comply with Rule 13p-1 under the Securities Exchange Act of 1934 (“the Rule”). The Rule imposes certain reporting obligations on U.S. Securities and Exchange Commission (“SEC”) issuers whose manufactured products contain certain minerals which are necessary to the functionality or production of their products. These minerals are cassiterite, columbite-tantalite (coltan), gold, wolframite, and their derivatives, which are limited to tin, tantalum and tungsten (“3TG(s)” or “Conflict Minerals”). The Rule focuses on 3TG emanating from the Democratic Republic of the Congo (“DRC”) region and nine adjoining countries (together, the “Covered Countries”). If an issuer has reason to believe that any of the Conflict Minerals in their supply chain may have originated in the Covered Countries, or if they are unable to determine the country of origin of those Conflict Minerals, then the issuer must exercise due diligence on the Conflict Minerals’ source and chain of custody and submit a CMR to the SEC that includes a description of those due diligence measures.

This CMR relates to the process undertaken for Mallinckrodt products that were manufactured, or contracted to be manufactured, during the Reporting Period and that contain Conflict Minerals. The Company’s policy with respect to the sourcing of conflict minerals (the “Conflict Minerals Policy”) can be found on its website at <http://www.mallinckrodt.com/about/partnering/suppliers/conflict-minerals-policy/>.

### Executive Summary

Mallinckrodt performed a Reasonable Country of Origin Inquiry (“RCOI”) on suppliers believed to provide Mallinckrodt with materials or components containing 3TGs that are necessary to the manufacture of Mallinckrodt’s medical device products. None of the Company’s pharmaceutical medicines, biologic products or active pharmaceutical ingredients contain Conflict Minerals. Mallinckrodt’s suppliers identified 350 valid smelters and refineries (“smelters”), of which Mallinckrodt identified 49 as sourcing (or there was reason to believe they may be sourcing) from the Covered Countries. Mallinckrodt’s due diligence review indicated that 36 of these smelters have been audited and are conformant to the Responsible Minerals Assurance Process (“RMAP”). The remaining 13 smelters were subject to Mallinckrodt’s risk mitigation process according to the Organisation for Economic Co-operation and Development (“OECD”) Due Diligence Guidance for Responsible Supply Chain of Minerals from Conflict-Affected and High-Risk Areas (“OECD Due Diligence Guidance”).

---

## Company Management Systems

Mallinckrodt's strong management systems were established according to Step 1 of the OECD Due Diligence Guidance. Mallinckrodt's management systems included:

- Step 1A - Adopted, and clearly communicated to suppliers and the public, a company policy for the supply chain of minerals originating from conflict-affected and high-risk areas:
  - Implemented a Conflict Minerals policy;
    - Policy made publicly available at <http://www.mallinckrodt.com/about/partnering/suppliers/conflict-minerals-policy/>; and
    - Policy communicated directly to suppliers as part of RCOI process.
- Step 1B - Structured internal management to support supply chain due diligence.
  - Maintained an internal cross functional team to support supply chain due diligence;
  - Appointed a member of the senior staff with the necessary competence, knowledge, and experience to oversee supply chain due diligence; and
  - Applied the resources necessary to support the operation and monitoring of these processes including internal resources and external consulting support.
- Step 1C - Established a system of transparency, information collection and control over the supply chain:
  - Implemented a process to collect required supplier and smelter RCOI and due diligence data. Full details on the supply chain data gathering are included in the RCOI and Due Diligence sections of this CMR.
- Step 1D - Strengthened company engagement with suppliers:
  - Directly engaged suppliers during RCOI process;
  - Reviewed supplier responses as part of RCOI process; and
  - Implemented a plan to improve the quantity and quality of supplier and smelter responses year over year.
- Step 1E - Established a company and/or mine level grievance mechanism:
  - Recognized the RMAP's three audit protocols for 3TG as valid sources of smelter or mine level grievances; and
  - Utilized Mallinckrodt's ethics violations reporting system which allows employees to voice confidentially, without any fear of retribution, any concerns of potential violations of the Company's Conflict Minerals Policy.

## Reasonable Country of Origin Inquiry (RCOI)

Mallinckrodt designed its RCOI process in accordance with Step 2A and 2B of the OECD Due Diligence Guidance. Mallinckrodt's RCOI process involved two stages:

- Stage 1 - Supplier RCOI (Step 2A of the OECD Due Diligence Guidance)
  - Stage 2 - Smelter RCOI (Step 2B of the OECD Due Diligence Guidance)
-

### *Supplier RCOI*

Mallinckrodt designed its supplier RCOI process to identify, to the best of its efforts, the smelters in Mallinckrodt's supply chain in accordance with Step 2A of the OECD Due Diligence Guidance. Mallinckrodt's supplier RCOI process for the Reporting Period included the following:

- Developing a list of suppliers providing 3TG containing components to Mallinckrodt;
- Contacting each supplier and requesting them to complete the industry standard Conflict Minerals Reporting Template ("CMRT") including smelter information;
- Reviewing supplier responses for accuracy and completeness;
- Amalgamating supplier-provided smelters into a single unique list of smelters meeting the definition of a smelter under one of three industry recognized audit protocols; and
- Reviewing the final smelter list (and comparing it to industry peers) to determine if Mallinckrodt reasonably identified all of the smelters in its supply chain.

For the Reporting Period, Mallinckrodt's RCOI process was executed by Claigan Environmental Inc. ("Claigan").

Mallinckrodt's suppliers identified 350 smelters in their supply chain. The specific list of smelters is included in the Smelter and Refineries section at the end of this CMR.

### *Smelter RCOI*

Due to the overlap between smelter RCOI and smelter due diligence, the smelter RCOI process is summarized in the Due Diligence section of this CMR.

### **Due Diligence**

Mallinckrodt's "Due Diligence Process" was designed in accordance with the applicable sections of Steps 2, 3, and 4 of the OECD Due Diligence Guidance.

#### *Smelter RCOI and Due Diligence*

Mallinckrodt's smelter RCOI and Due Diligence Process were designed to:

- Identify the scope of the risk assessment of the mineral supply chain (OECD Step 2B);
  - Assess whether the smelters/refiners have carried out all elements of due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas (OECD Step 2C); and
  - Where necessary, carry out, including through participation in industry-driven programs, joint spot checks at the mineral smelter's own facilities (OECD Step 2D).
-

Mallinckrodt's smelter RCOI and Due Diligence Process included the following:

- For each smelter identified in Mallinckrodt's supply chain:
  - Mallinckrodt attempted direct engagement with the smelter to determine whether or not the smelter sources from the Covered Countries; and
  - For smelters that declared directly (e.g., email correspondence, publicly available Conflict Minerals policy, or information available on their website) or through their relevant industry association that they did not source from the Covered Countries, but were not recognized as conflict-free by the RMAP, Mallinckrodt reviewed publicly available information to determine if there was any contrary evidence to the smelter's declaration. The sources reviewed included:
    - Public internet search of the facility in combination with each of the Covered Countries;
    - Review of specific non-governmental organization ("NGO") publications. NGO publications reviewed included:
      - Enough Project
      - Global Witness
      - Southern Africa Resource Watch
      - Radio Okapi
    - The most recent United Nations Group of Experts report on the DRC.
- For smelters that did not respond to direct engagement, Mallinckrodt reviewed publicly available sources to determine if there was any reason to believe that the smelter may have sourced from the Covered Countries during the Reporting Period.
  - Mallinckrodt reviewed the same sources as those used to compare against smelter sourcing declarations.
- For high-risk smelters (smelters that are sourcing from, or there is reason to believe may be sourcing from, the Covered Countries and are not currently conformant to the RMAP), Mallinckrodt communicates the risk to senior management (OECD Step 3A) and may conduct risk mitigation as appropriate on the smelter according to OECD Step 3B.

For the Reporting Period, Mallinckrodt's smelter RCOI and Due Diligence Process was executed by Claigan.

Mallinckrodt's suppliers identified 350 smelters. Mallinckrodt identified 49 smelters that source, or there is reason to believe they may source, from the Covered Countries.

Mallinckrodt determined that 36 of these 49 smelters have been audited and are conformant to the RMAP, as of May 23, 2023.

---

### *Risk Mitigation*

Mallinckrodt is committed to conducting risk mitigation on the 13 smelters that were not recognized as conformant to the RMAP. Mallinckrodt's risk mitigation was designed in accordance with Step 3B of the OECD Due Diligence Guidance and was reported to designated senior management in accordance with Step 3A of the OECD Due Diligence Guidance. Mallinckrodt's risk mitigation process included the following:

- Additional due diligence to determine if there was any reason to believe the smelter directly or indirectly finances or benefits armed groups in the Covered Countries;
- Verification with internal stakeholders and relevant suppliers of whether 3TGs from the specific smelter were actually in Mallinckrodt's supply chain during the Reporting Period; and
- Direct engagement with each high-risk smelter to verify risk and to encourage the smelter to become conflict-free.

Risk mitigation was required for 13 smelters verified by suppliers likely to be in Mallinckrodt's supply chain. All 13 smelters came into Mallinckrodt's supply chain through 25 suppliers, involving a small number of parts.

### **Improvement Plan**

Mallinckrodt strives to improve the due diligence conducted to further mitigate risk that the necessary conflict minerals in Mallinckrodt's products could directly or indirectly benefit or finance armed groups in the Covered Countries and will continue to take the following steps:

- a. Incorporate a Conflict Minerals clause into new and renewing supplier contracts;
- b. Encourage Mallinckrodt suppliers to obtain current, accurate, and complete information about the smelters in their respective supply chains;
- c. Request smelters sourcing from the Covered Countries to be audited and certified to a protocol recognized by the RMAP; and
- d. Evaluate opportunities to encourage the 25 suppliers to remove the 13 non-conformant smelters from their supply chain or attempt to identify alternate suppliers.

Mallinckrodt has provided information as of the date of this report. Subsequent events, such as the inability or unwillingness of any suppliers or smelters to comply with Mallinckrodt's Conflict Minerals Policy, may affect the Company's future determinations under the Rule.

Website addresses are included in this CMR for reference only. Any information contained on Mallinckrodt's website is not incorporated by reference into this CMR.

---



## Smelters and Refineries

Below are the smelters reported to Mallinckrodt as likely to be in the Company's supply chain in the Reporting Period.

| <b>Metal</b> | <b>Smelter</b>  |
|--------------|---|
| Gold         | 8853 S.p.A.   |
| Gold         | ABC Refinery Pty Ltd.   |
| Gold         | Abington Reldan Metals, LLC                                   |
| Gold         | Advanced Chemical Company                                     |
| Gold         | African Gold Refinery   |
| Gold         | Agosi AG  |
| Gold         | Aida Chemical Industries Co., Ltd.                            |
| Gold         | Al Etihad Gold Refinery DMCC                                  |
| Gold         | Albino Mountinho Lda.   |
| Gold         | Alexy Metals  |
| Gold         | Almalyk Mining and Metallurgical Complex (AMMC)               |
| Gold         | AngloGold Ashanti Córrego do Sítio Mineração                  |
| Gold         | Argor-Heraeus S.A.  |
| Gold         | Asahi Pretec Corp.  |
| Gold         | Asahi Refining Canada Ltd.                                    |
| Gold         | Asahi Refining USA Inc.                                       |
| Gold         | Asaka Riken Co., Ltd.   |
| Gold         | Atasay Kuyumculuk Sanayi Ve Ticaret A.S.                      |
| Gold         | AU Traders and Refiners                                       |
| Gold         | Augmont Enterprises Private Limited                           |
| Gold         | Aurubis AG  |
| Gold         | Bangalore Refinery  |
| Gold         | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) |
| Gold         | Boliden AB  |
| Gold         | C. Hafner GmbH + Co. KG                                       |
| Gold         | C.I Metales Procesados Industriales SAS                       |
| Gold         | Caridad   |
| Gold         | CCR Refinery - Glencore Canada Corporation                    |
| Gold         | Cendres + Métaux S.A.   |
| Gold         | CGR Metalloys Pvt Ltd.  |
| Gold         | Chimet S.p.A.   |
| Gold         | Chugai Mining   |
| Gold         | Coimpa Industrial LTDA  |
| Gold         | Daye Non-Ferrous Metals Mining Ltd.                           |
| Gold         | Degussa Sonne / Mond Goldhandel GmbH                          |
| Gold         | Dijllah Gold Refinery FZC                                     |
| Gold         | Dongwu Gold Group   |
| Gold         | Dowa  |
| Gold         | DSC (Do Sung Corporation)                                     |
| Gold         | Eco-System Recycling Co., Ltd. East Plant                     |
| Gold         | Eco-System Recycling Co., Ltd. North Plant                    |
| Gold         | Eco-System Recycling Co., Ltd. West Plant                     |
| Gold         | Emerald Jewel Industry India Limited (Unit 1)                 |
| Gold         | Emerald Jewel Industry India Limited (Unit 2)                 |
| Gold         | Emerald Jewel Industry India Limited (Unit 3)                 |
| Gold         | Emerald Jewel Industry India Limited (Unit 4)                 |
| Gold         | Emirates Gold DMCC  |

|      |   |
|------|---|
| Gold | Fidelity Printers and Refiners Ltd.                             |
| Gold | Fujairah Gold FZC   |
| Gold | Geib Refining Corporation                                       |
| Gold | GGC Gujrat Gold Centre Pvt. Ltd.                                |
| Gold | Gold by Gold Colombia   |
| Gold | Gold Coast Refinery   |
| Gold | Gold Refinery of Zijin Mining Group Co., Ltd.                   |
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM                    |
| Gold | Guangdong Jinding Gold Limited                                  |
| Gold | Guoda Safina High-Tech Environmental Refinery Co., Ltd.         |
| Gold | Hangzhou Fuchunjiang Smelting Co., Ltd.                         |
| Gold | Heimerle + Meule GmbH   |
| Gold | Henan Yuguang Gold & Lead Co., Ltd.                             |
| Gold | Heraeus Germany GmbH Co. KG                                     |
| Gold | Heraeus Metals Hong Kong Ltd.                                   |
| Gold | Hunan Chenzhou Mining Co., Ltd.                                 |
| Gold | Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd.             |
| Gold | HwaSeong CJ Co., Ltd.   |
| Gold | Industrial Refining Company                                     |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. |
| Gold | International Precious Metal Refiners                           |
| Gold | Ishifuku Metal Industry Co., Ltd.                               |
| Gold | Istanbul Gold Refinery  |
| Gold | Italpreziosi  |
| Gold | JALAN & Company   |
| Gold | Japan Mint  |
| Gold | Jiangxi Copper Co., Ltd.  |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant             |
| Gold | JSC Novosibirsk Refinery  |
| Gold | JSC Uralelectromed  |
| Gold | JX Nippon Mining & Metals Co., Ltd.                             |
| Gold | K.A. Rasmussen  |
| Gold | Kaloti Precious Metals  |
| Gold | Kazakhmys Smelting LLC  |
| Gold | Kazzinc   |
| Gold | Kennecott Utah Copper LLC                                       |
| Gold | KGHM Polska Miedz Spółka Akcyjna                                |
| Gold | Kojima Chemicals Co., Ltd.                                      |
| Gold | Korea Zinc Co., Ltd.  |
| Gold | Kundan Care Products Ltd.                                       |
| Gold | Kyrgyzaltyn JSC   |
| Gold | Kyshtym Copper-Electrolytic Plant ZAO                           |
| Gold | L'azurde Company For Jewelry                                    |
| Gold | L'Orfebvre S.A.   |
| Gold | Lingbao Gold Co., Ltd.  |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd.                      |
| Gold | LS-NIKKO Copper Inc.  |
| Gold | LT Metal Ltd.   |
| Gold | Luoyang Zijin Yinhuai Gold Refinery Co., Ltd.                   |
| Gold | Marsam Metals   |
| Gold | Materion  |
| Gold | Matsuda Sangyo Co., Ltd.  |
| Gold | MD Overseas   |
| Gold | Metal Concentrators SA (Pty) Ltd.                               |

|      |   |
|------|---|
| Gold | Metallix Refining Inc.  |
| Gold | Metalor Technologies (Hong Kong) Ltd.                                       |
| Gold | Metalor Technologies (Singapore) Pte., Ltd.                                 |
| Gold | Metalor Technologies (Suzhou) Ltd.  |
| Gold | Metalor Technologies S.A.   |
| Gold | Metalor USA Refining Corporation  |
| Gold | Metalúrgica Met-Mex Peñoles S.A. De C.V.                                    |
| Gold | Mitsubishi Materials Corporation  |
| Gold | Mitsui Mining and Smelting Co., Ltd.  |
| Gold | MKS PAMP SA   |
| Gold | MMTC-PAMP India Pvt., Ltd.  |
| Gold | Modeltech Sdn Bhd   |
| Gold | Morris and Watson   |
| Gold | Moscow Special Alloys Processing Plant                                      |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.Ş.                                      |
| Gold | Navoi Mining and Metallurgical Combinat                                     |
| Gold | NH Recytech Company   |
| Gold | Nihon Material Co., Ltd.  |
| Gold | Ögussa Österreichische Gold- und Silber-Scheideanstalt GmbH                 |
| Gold | Ohura Precious Metal Industry Co., Ltd.                                     |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) |
| Gold | Pease & Curren  |
| Gold | Penglai Penggang Gold Industry Co., Ltd.                                    |
| Gold | Planta Recuperadora de Metales SpA  |
| Gold | Prioksky Plant of Non-Ferrous Metals  |
| Gold | PT Aneka Tambang (Persero) Tbk  |
| Gold | PX Precinox S.A.  |
| Gold | QG Refining, LLC  |
| Gold | Rand Refinery (Pty) Ltd.  |
| Gold | Refinery of Seemine Gold Co., Ltd.  |
| Gold | REMONDIS PMR B.V.   |
| Gold | Royal Canadian Mint   |
| Gold | SAAMP   |
| Gold | Sabin Metal Corp.   |
| Gold | Safimet S.p.A   |
| Gold | SAFINA A.S.   |
| Gold | Sai Refinery  |
| Gold | Sam Precious Metals   |
| Gold | Samduck Precious Metals   |
| Gold | SAMWON Metals Corp.   |
| Gold | Sancus ZFS (L'Orfebre, SA)  |
| Gold | Sellem Industries Ltd.  |
| Gold | SEMPSA Joyería Platería S.A.  |
| Gold | Shandong Gold Smelting Co., Ltd.  |
| Gold | Shandong Humon Smelting Co., Ltd.   |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd.                     |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.                           |
| Gold | Shenzhen CuiLu Gold Co., Ltd.   |
| Gold | Shenzhen Zhonghenglong Real Industry Co., Ltd.                              |
| Gold | Shirpur Gold Refinery Ltd.  |
| Gold | Sichuan Tianze Precious Metals Co., Ltd.                                    |
| Gold | Singway Technology Co., Ltd.  |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals                        |
| Gold | Solar Applied Materials Technology Corp.                                    |

|          |  |
|----------|--|
| Gold     | Sovereign Metals   |
| Gold     | State Research Institute Center for Physical Sciences and Technology |
| Gold     | Sudan Gold Refinery  |
| Gold     | Sumitomo Metal Mining Co., Ltd.                                      |
| Gold     | SungEel HiMetal Co., Ltd.  |
| Gold     | Super Dragon Technology Co., Ltd.                                    |
| Gold     | T.C.A S.p.A  |
| Gold     | Tanaka Kikinzoku Kogyo K.K.  |
| Gold     | Tokuriki Honten Co., Ltd.  |
| Gold     | Tongling Nonferrous Metals Group Co., Ltd.                           |
| Gold     | TOO Tau-Ken-Altyn  |
| Gold     | Torecom  |
| Gold     | Umicore Precious Metals Thailand                                     |
| Gold     | Umicore S.A. Business Unit Precious Metals Refining                  |
| Gold     | United Precious Metal Refining, Inc.                                 |
| Gold     | Valcambi S.A.  |
| Gold     | Value Trading  |
| Gold     | WEEEREFINING   |
| Gold     | Western Australian Mint (T/a The Perth Mint)                         |
| Gold     | WIELAND Edelmetalle GmbH   |
| Gold     | Yamakin Co., Ltd.  |
| Gold     | Yokohama Metal Co., Ltd.   |
| Gold     | Yunnan Copper Industry Co., Ltd.                                     |
| Gold     | Zhongkuang Gold Industry Co., Ltd.                                   |
| Gold     | Zhongyuan Gold Smelter of Zhongjin Gold Corporation                  |
| Tantalum | 5D Production OU   |
| Tantalum | AMG Brasil   |
| Tantalum | D Block Metals, LLC  |
| Tantalum | F&X Electro-Materials Ltd.   |
| Tantalum | FIR Metals & Resource Ltd.   |
| Tantalum | Global Advanced Metals Aizu  |
| Tantalum | Global Advanced Metals Boyertown                                     |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd.                    |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd.                         |
| Tantalum | Jiangxi Tuohong New Raw Material                                     |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd.                          |
| Tantalum | Jiujiang Tanbre Co., Ltd.  |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd.                        |
| Tantalum | KEMET de Mexico  |
| Tantalum | Materion Newton Inc.   |
| Tantalum | Metallurgical Products India Pvt., Ltd.                              |
| Tantalum | Mineração Taboca S.A.  |
| Tantalum | Mitsui Mining & Smelting   |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd.                           |
| Tantalum | NPM Silmet AS  |
| Tantalum | PowerX Ltd.  |
| Tantalum | QuantumClean   |
| Tantalum | Resind Indústria e Comércio Ltda.                                    |
| Tantalum | RFH Yancheng Jinye New Material Technology Co., Ltd.                 |
| Tantalum | Solikamsk Magnesium Works OAO  |
| Tantalum | Taki Chemical Co., Ltd.  |
| Tantalum | TANIOBIS Co., Ltd.   |
| Tantalum | TANIOBIS GmbH  |
| Tantalum | TANIOBIS Japan Co., Ltd.   |

|          |   |
|----------|---|
| Tantalum | TANIOBIS Smelting GmbH & Co. KG   |
| Tantalum | Telex Metals  |
| Tantalum | Ulba Metallurgical Plant JSC  |
| Tantalum | XIMEI RESOURCES (GUANGDONG) LIMITED   |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd.   |
| Tantalum | Yanling Jincheng Tantalum & Niobium Co., Ltd.   |
| Tin      | Alpha   |
| Tin      | An Vinh Joint Stock Mineral Processing Company  |
| Tin      | Aurubis Beerse  |
| Tin      | Aurubis Berango   |
| Tin      | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.                                     |
| Tin      | Chifeng Dajingzi Tin Industry Co., Ltd.   |
| Tin      | China Tin Group Co., Ltd.   |
| Tin      | CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda          |
| Tin      | CRM Synergies   |
| Tin      | CV Ayi Jaya   |
| Tin      | CV Venus Inti Perkasa   |
| Tin      | Dongguan CiEXPO Environmental Engineering Co., Ltd.                                   |
| Tin      | Dowa  |
| Tin      | DS Myanmar  |
| Tin      | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company |
| Tin      | EM Vinto  |
| Tin      | Estanho de Rondônia S.A.  |
| Tin      | Fabrica Auricchio Industria e Comercio Ltda.  |
| Tin      | Fenix Metals  |
| Tin      | Gejiu City Fuxiang Industry and Trade Co., Ltd.                                       |
| Tin      | Gejiu Kai Meng Industry and Trade LLC   |
| Tin      | Gejiu Non-Ferrous Metal Processing Co., Ltd.  |
| Tin      | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.  |
| Tin      | Gejiu Zili Mining And Metallurgy Co., Ltd.  |
| Tin      | Guangdong Hanhe Non-Ferrous Metal Co., Ltd.   |
| Tin      | Jiangxi New Nanshan Technology Ltd.   |
| Tin      | Luna Smelter, Ltd.  |
| Tin      | Magnu's Minerais Metais e Ligas Ltda.   |
| Tin      | Malaysia Smelting Corporation (MSC)   |
| Tin      | Melt Metais e Ligas S.A.  |
| Tin      | Metallic Resources, Inc.  |
| Tin      | Mineração Taboca S.A.   |
| Tin      | Minsur  |
| Tin      | Mitsubishi Materials Corporation  |
| Tin      | Modeltech Sdn Bhd   |
| Tin      | Nghe Tinh Non-Ferrous Metals Joint Stock Company                                      |
| Tin      | Novosibirsk Tin Combine   |
| Tin      | O.M. Manufacturing (Thailand) Co., Ltd.   |
| Tin      | O.M. Manufacturing Philippines, Inc.  |
| Tin      | Operaciones Metalúrgicas S.A.   |
| Tin      | Pongpipat Company Limited   |
| Tin      | Precious Minerals and Smelting Limited  |
| Tin      | PT Aries Kencana Sejahtera  |
| Tin      | PT Artha Cipta Langgeng   |
| Tin      | PT ATD Makmur Mandiri Jaya  |
| Tin      | PT Babel Inti Perkasa   |
| Tin      | PT Babel Surya Alam Lestari   |
| Tin      | PT Bangka Prima Tin   |

|          |  |
|----------|--|
| Tin      | PT Bangka Serumpun   |
| Tin      | PT Bangka Tin Industry                                     |
| Tin      | PT Belitung Industri Sejahtera                             |
| Tin      | PT Bukit Timah   |
| Tin      | PT Cipta Persada Mulia                                     |
| Tin      | PT Menara Cipta Mulia                                      |
| Tin      | PT Mitra Stania Prima                                      |
| Tin      | PT Mitra Sukses Globalindo                                 |
| Tin      | PT Panca Mega Persada                                      |
| Tin      | PT Premium Tin Indonesia                                   |
| Tin      | PT Prima Timah Utama                                       |
| Tin      | PT Putera Sarana Shakti (PT PSS)                           |
| Tin      | PT Rajawali Rimba Perkasa                                  |
| Tin      | PT Refined Bangka Tin                                      |
| Tin      | PT Sariwiguna Binasentosa                                  |
| Tin      | PT Stanindo Inti Perkasa                                   |
| Tin      | PT Sukses Inti Makmur                                      |
| Tin      | PT Timah Nusantara   |
| Tin      | PT Timah Tbk Kundur  |
| Tin      | PT Timah Tbk Mentok  |
| Tin      | PT Tinindo Inter Nusa                                      |
| Tin      | PT Tirus Putra Mandiri                                     |
| Tin      | PT Tommy Utama   |
| Tin      | Resind Indústria e Comércio Ltda.                          |
| Tin      | Rui Da Hung  |
| Tin      | Super Ligas  |
| Tin      | Thaisarco  |
| Tin      | Tin Smelting Branch of Yunnan Tin Co., Ltd.                |
| Tin      | Tin Technology & Refining                                  |
| Tin      | Tuyen Quang Non-Ferrous Metals Joint Stock Company         |
| Tin      | VQB Mineral and Trading Group JSC                          |
| Tin      | White Solder Metalurgia e Mineração Ltda.                  |
| Tin      | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.              |
| Tin      | Yunnan Yunfan Non-ferrous Metals Co., Ltd.                 |
| Tungsten | A.L.M.T. Corp.   |
| Tungsten | ACL Metais Eireli  |
| Tungsten | Albasteel Industria e Comercio de Ligas Para Fundicao Ltd. |
| Tungsten | Artek LLC  |
| Tungsten | Asia Tungsten Products Vietnam Ltd.                        |
| Tungsten | China Molybdenum Co., Ltd.                                 |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd.                       |
| Tungsten | CNMC (Guangxi) PGMA Co., Ltd.                              |
| Tungsten | Cronimet Brasil Ltda                                       |
| Tungsten | DONGKUK INDUSTRIES CO., LTD.                               |
| Tungsten | Fujian Xinlu Tungsten Co., Ltd.                            |
| Tungsten | Ganzhou Haichuang Tungsten Co., Ltd.                       |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd.                |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd.                    |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd.                         |
| Tungsten | Global Tungsten & Powders Corp.                            |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd.                       |
| Tungsten | H.C. Starck Tungsten GmbH                                  |
| Tungsten | HANNAE FOR T Co., Ltd.                                     |
| Tungsten | Hubei Green Tungsten Co., Ltd.                             |

|          |  |
|----------|--|
| Tungsten | Hunan Chenzhou Mining Co., Ltd.  |
| Tungsten | Hunan Jintai New Material Co., Ltd.  |
| Tungsten | Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch |
| Tungsten | Hydrometallurg, JSC  |
| Tungsten | Japan New Metals Co., Ltd.   |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd.                                |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd.   |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.                          |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.                  |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd.                                   |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd.  |
| Tungsten | JSC "Kirovgrad Hard Alloys Plant"  |
| Tungsten | Kennametal Fallon  |
| Tungsten | Kennametal Huntsville  |
| Tungsten | Lianyou Metals Co., Ltd.   |
| Tungsten | LLC Vostok   |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd.  |
| Tungsten | Masan High-Tech Materials  |
| Tungsten | Moliren Ltd.   |
| Tungsten | Nam Viet Cromit Joint Stock Company  |
| Tungsten | Niagara Refining LLC   |
| Tungsten | NPP Tyazhmetprom LLC   |
| Tungsten | OOO "Technolom" 1  |
| Tungsten | OOO "Technolom" 2  |
| Tungsten | Philippine Chuangxin Industrial Co., Inc.                                      |
| Tungsten | TANIOBIS Smelting GmbH & Co. KG  |
| Tungsten | Tungsten Vietnam Joint Stock Company   |
| Tungsten | Unecha Refractory Metals Plant   |
| Tungsten | Wolfram Bergbau und Hütten AG  |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd.   |
| Tungsten | Xiamen Tungsten Co., Ltd.  |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.                    |
| Tungsten | YUDU ANSHENG TUNGSTEN CO., LTD.  |

## Country of Origin Information

For 2022, the countries of origin for 3TGs processed by the above listed smelters and refiners may have included the below listed countries.

|                  |              |
|------------------|--------------|
| Argentina        | Rwanda       |
| Australia        | South Africa |
| Austria          | South Korea  |
| Belgium          | Spain        |
| Bolivia          | Sudan        |
| Brazil           | Suriname     |
| Burkina Faso     | Tajikistan   |
| Burundi          | Tanzania     |
| Canada           | Turkey       |
| Chile            | Uganda       |
| China            | USA          |
| Colombia         | Uzbekistan   |
| DRC              | Vietnam      |
| Egypt            | Zimbabwe     |
| Ethiopia         | Uganda       |
| French Guyana    | USA          |
| Germany          | Uzbekistan   |
| Ghana            | Vietnam      |
| Guinea           | Zimbabwe     |
| Guyana           |              |
| Honduras         |              |
| India            |              |
| Indonesia        |              |
| Japan            |              |
| Kazakhstan       |              |
| Kyrgyzstan       |              |
| Laos             |              |
| Malaysia         |              |
| Mali             |              |
| Mexico           |              |
| Mozambique       |              |
| Myanmar          |              |
| Namibia          |              |
| New Zealand      |              |
| Nigeria          |              |
| Papua New Guinea |              |
| Peru             |              |
| Philippines      |              |
| Poland           |              |
| Russia           |              |

---