

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

Form SD

SPECIALIZED DISCLOSURE REPORT

NeoPhotonics Corporation

(Exact name of registrant as specified in its charter)

Delaware

(State or other
jurisdiction of
incorporation or
organization)

001-35061

(Commission File
No.)

3081 Zanker Road
San Jose, CA 95134

(Address of principal executive offices) (Zip Code)

Barbara Rogan
408-321-2370

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

Check the appropriate box to indicate the rule pursuant to which this form is being filed:

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1, 2021 to December 31, 2021.

Rule 13q-1 under the Securities Exchange Act (17 CFR 240.13q-1) for the fiscal year ended _____.

Section 1. Conflict Minerals Disclosure.

Item 1.01. Conflict Minerals Disclosure and Report.

Conflict Minerals Disclosure

This Form SD of NeoPhotonics Corporation (the “Company”) is filed pursuant to Rule 13p-1 promulgated under the Securities Exchange Act of 1934, as amended, for the reporting period from January 1, 2021 to December 31, 2021.

In accordance with Rule 13p-1, the Company has prepared a Conflict Minerals Report, a copy of which is attached hereto as Exhibit 1.01. The Conflict Minerals Report is also publicly available in the “Sustainability” section on the Company’s website at www.neophotonics.com.

Item 1.02. Exhibit.

The Company is hereby filing its Conflict Minerals Report 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.

The following exhibit is filed as a part of this report:

| Exhibit No. | Description |
|-------------|---|
| 1.01 | Conflict Minerals Report of NeoPhotonics Corporation. |

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.

Date: May 25, 2022

NeoPhotonics Corporation

By: /s/ Timothy S. Jenks
Name: Timothy S. Jenks
Title: President & CEO

EXHIBIT INDEX

| Exhibit No. | Description |
|-----------------------------|--|
| <u>1.01</u> | <u>Conflict Minerals Report of NeoPhotonics Corporation.</u> |

NeoPhotonics Corporation
Conflict Minerals Report

For the reporting period from January 1, 2021 to December 31, 2021

This Conflict Minerals Report (this “Report”) of NeoPhotonics Corporation (the “Company” or “we”, “us” or “our”) has been prepared pursuant to Rule 13p-1 and Form SD (the “Rule”) promulgated under the Securities Exchange Act of 1934, as amended, for the reporting period from January 1, 2021 to December 31, 2021. The Rule was adopted by the Securities and Exchange Commission (“SEC”) to implement reporting and disclosure requirements related to conflict minerals as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010.

The Rule requires disclosure of certain information when a company manufactures or contracts to manufacture a product and any mineral specified in the Rule is necessary for the functionality or production of such products. The specified minerals, which we collectively refer to in this Report as the “3TG Minerals,” are gold, columbite-tantalite (coltan), cassiterite and wolframite, including their derivatives, which are limited to tantalum, tin and tungsten. The “Covered Countries” for the purposes of the Rule and this Report are the Democratic Republic of the Congo and its adjoining countries, which include Angola, Burundi, the Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Uganda, Tanzania and Zambia. As described in this Report, certain of the Company’s operations manufacture, or contract to manufacture, the Covered Products (as defined below), and the 3TG Minerals are necessary for the functionality or production of those products.

Description of the Company’s Products Covered by this Report

This Report relates to products: (i) for which 3TG Minerals are necessary to the functionality or production of that product; (ii) that were manufactured, or contracted to be manufactured, by the Company; and (iii) for which the manufacture was completed during the calendar year 2021.

The Company is a leading developer and manufacturer of silicon photonics and advanced hybrid photonic integrated circuit-based lasers, modules and subsystems for bandwidth-intensive, high-speed communications networks. Our products, which are referred to in this Report collectively as the “Covered Products,” include electro-optical transceivers for telecom and datacom applications, optical semiconductor devices for detection, amplification, and modulation of optical signals, semiconductor lasers and laser assemblies for transmission and modulation of optical signals, passive optical devices for optical signal management, MEMS-based optical attenuation devices and optical receivers.

The Company’s supply chain with respect to the Covered Products is complex, and there are many third parties in the supply chain between the ultimate manufacturer of the Covered Products and the original sources of 3TG Minerals. In this regard, the Company does not purchase 3TG Minerals directly from mines, smelters or refiners. The Company must therefore rely on its direct suppliers to provide information regarding the origin of 3TG Minerals that are included in the Covered Products, including sources of 3TG Minerals that are supplied to them by sub-tier suppliers. Moreover, the Company believes that the smelters and refiners of the 3TG Minerals are best suited to identify the sources of 3TG Minerals, and therefore has taken steps to identify the applicable smelters and refiners of 3TG Minerals in the Company’s supply chain.

Reasonable Country of Origin Inquiry

The Company conducted a good faith reasonable country of origin inquiry regarding the 3TG Minerals in its Covered Products. This good faith reasonable country of origin inquiry was reasonably designed to determine whether any of the 3TG Minerals originated in the Covered Countries and whether any of the 3TG Minerals may be from recycled scrap or scrap sources. In designing its reasonable country of origin inquiry, the Company employed a combination of measures, as described in this Report, to determine whether the 3TG Minerals in its Covered Products originated from the Covered Countries and, to the extent applicable, these measures were the same as the

processes and procedures the Company used for its due diligence as described below, including in particular Step 1 and Step 2 below.

In connection with its reasonable country of origin inquiry, the Company has requested information regarding 3TG Minerals in its supply chain from all of the Company's direct suppliers sourcing materials in the Covered Products, using the Conflict Minerals Reporting Template, version 6.1 (the "Conflict Minerals Survey") developed by the Responsible Minerals Initiative (RMI). During the course of the year, the Company also followed up with those suppliers who had not responded to the Company's previous requests for completion of the Conflict Minerals Survey and who previously provided incomplete responses to the Conflict Minerals Survey. The Company's outreach for 2021 included 151 suppliers, 94.0% of which responded to our request for information and 7.3% of which responded that the products they supply to the Company do not include 3TG Minerals.

Based on the results of its reasonable country of origin inquiry, the Company has reason to believe that, during the period covered by this Report, certain 3TG Minerals used in its Covered Products may have originated in the Covered Countries and, as a result, the Company was required to conduct due diligence for 2021. These due diligence efforts are discussed below.

Due Diligence Process

Based on the results of the Company's reasonable country of origin inquiry, the Company exercised due diligence on the source and chain of custody of the 3TG Minerals in its Covered Products. The Company's due diligence measures are designed to attempt to ascertain the facilities used to process any 3TG Minerals in our Covered Products, the country of origin of any 3TG Minerals in our Covered Products and the mine(s) or location of origin with the greatest possible specificity.

The Company's due diligence measures have been designed to conform in all material respects to the framework in the Organization for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chain of Minerals from Conflict-Affected and High-Risk Areas: Third Edition, including the related supplements on gold, tin, tantalum and tungsten (the "OECD Guidance"). The OECD Guidance specifies a five-step framework for risk-based due diligence for responsible supply chains of minerals sourced from conflict-affected and high-risk areas.

Step 1: Establish Strong Company Management Systems

- (i) **Supply Chain Policy for Conflict Minerals.** The Company has adopted a statement and a policy relating to 3TG Minerals (the "Conflict Minerals Statement" and the "Conflict Minerals Policy," respectively). The Conflict Minerals Statement states that the Company is committed to working with our global supply chain to ensure compliance with the OECD Guidance and regulations promulgated by the SEC concerning 3TG Minerals. We also note in our statement that our supplier agreements include conflict mineral due diligence and reporting requirements. The Conflict Minerals Policy further provides that the Company will make best efforts to ensure that any direct sourcing by the Company of tin, tungsten, tantalum and gold will only be from sources that are DRC conflict-free, as defined in the Rule. If we become aware of instances where 3TG Minerals in our supply chain potentially finance armed groups, as defined in the Rule, we will work with our suppliers to find alternate conflict-free sources. Our Conflict Minerals Statement and Conflict Minerals Policy are publicly available in the Sustainability section on the Company's website at www.neophotonics.com.
- (ii) **Management Support.** To enable compliance with the SEC's regulations concerning 3TG Minerals, the Company has developed a process that is aligned with its Conflict Minerals Statement and Conflict Minerals Policy, and is documented in the Company's controlled procedure entitled "Conflict Materials Management and Control Procedure." The Company initiated a program to address the SEC's conflict minerals requirements in early 2013. This program is managed by a team of subject matter experts from relevant functions within the Company, including Supply Chain Management, Quality Systems, Research and Development, Product Application Engineering and Customer Service (the "Conflict Minerals Compliance Team") and is led by our Vice President Product Engineering Reliability & Quality. This global activity is overseen by our Conflict Minerals Free Management Committee composed of our Vice President Product Engineering Reliability & Quality, our General Counsel, and our Senior Manager of System Quality Assurance.

- (iii) Controls and Transparency. To establish a system of controls and transparency over the conflict minerals supply chain, the Company incorporated into its due diligence procedures a requirement for suppliers to provide information regarding the smelters and refiners in the supply chain using the Conflict Minerals Survey. The Conflict Minerals Survey is designed by RMI, a recognized industry coalition that focuses on addressing conflict minerals in the supply chain. The Conflict Minerals Survey requires suppliers to provide information concerning the usage and source of 3TG Minerals in their components, parts and products, as well as information concerning their related compliance efforts. The Company elected to use the Conflict Minerals Survey because it is a commonly used reported template used in numerous industries, thereby easing the potential for confusion or misunderstanding by the Company's suppliers.
- (iv) Engagement with Suppliers. As the Company does not have a direct relationship with conflict mineral smelters and refiners, the Company relies on its suppliers to provide up-to-date and accurate smelter and refiner sourcing information. The Company's adoption and utilization of the industry standard RMI templates, tools and auditing program aided us in establishing consistency and transparency throughout the Company's supply chain. In addition, the Company has communicated its requirements to suppliers that the products they supply to the Company be compliant with its Conflict Minerals Statement.
- (v) Grievance Mechanism. The Company accepts the reporting of known or suspected false information or other grievances concerning its 3TG Minerals programs and practices, including compliance with the Conflict Minerals Statement and the Conflict Minerals Policy, by emailing conflict.minerals@neophotonics.com or by reporting a concern to the Company's ethics hotline. Information about how to access the ethics hotline is available in the Company's Code of Business Conduct available in the Investors section of the Company's website at www.neophotonics.com.

Step 2: Identify and Assess Risk in the Supply Chain

As described above, the requests for information regarding 3TG Minerals in the Company's products were sent to all of the Company's direct suppliers sourcing materials in the Company's products, using the Conflict Minerals Survey. Members of the Conflict Minerals Compliance Team collected and reviewed supplier responses to the Conflict Minerals Survey to identify incomplete, inaccurate or inconsistent responses, and consolidated this information in a central database. The Company followed up with those suppliers that failed to respond to the Conflict Minerals Survey or that submitted incomplete responses or responses that contained inaccuracies or inconsistencies or were otherwise determined not to be suitable. The Company also continues to work with those suppliers who have not yet provided responses or have provided incomplete responses.

To the extent that a completed response identified a smelter or refiner, the Company reviewed this information against the list of conflict free and "active" smelters and refiners and country of origin information published by RMI's Responsible Minerals Assurance Process. For non-certified smelters and refiners, we attempted outreach to encourage their participation in certification programs. The Company also attempted to ascertain whether the smelter or refiner information provided was specific to the products supplied to the Company to determine whether the identified smelters are in the Company's supply chain.

Step 3: Design and Implement a Strategy to Respond to Identified Risks

The Conflict Minerals Compliance Team reported the findings of its compliance efforts in respect of 2021 to the Conflict Minerals Free Management Committee who will report on an annual basis to the Board of Directors.

Pursuant to our Conflict Minerals Statement and Conflict Minerals Policy, if the Company becomes aware of instances where 3TG Minerals in our supply chain potentially finance armed groups, as defined in the Rule, we will work with our suppliers to find alternate conflict-free sources.

Further, to mitigate the risk that 3TG Minerals in our supply chain potentially finance armed groups, we intend to engage in the additional measures discussed under "Risk Mitigation Efforts" below.

Step 4: Carry Out Independent Third Party Audit of Supply Chain Due Diligence at Identified Points in the Supply Chain

Because the Company does not source 3TG Minerals directly from smelters or refiners, we rely on third parties, including RMI, to coordinate and conduct third party audits of these facilities. The Company utilizes the published results of these third-party audits to determine whether a specified smelter or refiner processes 3TG Minerals that directly or indirectly finance or benefit armed groups.

Step 5: Report on Supply Chain Due Diligence

The Company has filed a Form SD and this Conflict Minerals Report with the SEC and has made the Conflict Minerals Report available in the section on Sustainability on the Company's website at www.neophotonics.com.

Identified Smelters and Refiners

In connection with our reasonable country of origin inquiry or due diligence, as applicable, the Company's suppliers identified to us the smelters and refiners listed on Annex A as having processed the necessary 3TG Minerals contained in the Covered Products. Due to the Company's position in the supply chain, the Company relies on its suppliers for accurate smelter and refiner information. The Company's due diligence measures cannot provide absolute certainty regarding the source and chain of custody of the necessary 3TG Minerals contained in the Covered Products.

As indicated in the table in Annex A, the Company has gathered the names of 260 smelters and refiners identified by its direct suppliers in the Conflict Minerals Survey. Among them, 227 are on RMI's list of "Conformant" smelters and refiners, eight are included on RMI's list of "Active" smelters and refiners, and 25 are listed on RMI's Smelter Look-up tab of the Conflicts Minerals Survey but are not listed as "Conformant" or "Active." See Annex A for definitions of Conformant and Active.

Of the suppliers that responded to the Conflict Minerals Survey and confirmed that 3TG Minerals are included in the products supplied to the Company, a majority (64.1%) of the responses received provided smelter and refiner information at the company level or were unable to specify the smelters and refiners used for products supplied to the Company. The Company is unable to determine whether any of the 3TG Minerals reported by these suppliers were contained in components or parts supplied to us, or to validate that any of these smelters and refiners are actually in the Company's supply chain. In addition, 9.3% of responses to Conflict Minerals Survey Question 7 (Have you identified all of the smelters supplying the 3TG to your supply chain?) were "No". Therefore, in addition to being unable to determine whether reported smelters and refiners are part of the Company's supply chain, we are also unsure as to the completeness of the population of smelters and refiners received. Accordingly, the list of smelters and refiners in the table in Annex A may contain smelters and refiners that are not in our supply chain and there may be other smelters and refiners not yet identified in our due diligence process. We will continue to update the list as our information improves.

Country of Origin Information and Efforts to Determine Mine Location

Based on the Company's due diligence efforts to date, the Company does not have sufficient information to determine the country of origin of the 3TG Minerals in its Covered Products or the facilities used to process the 3TG Minerals, including whether the 3TG Minerals were from recycled or scrap sources.

Risk Mitigation Efforts

In the next compliance period, the Company will take the following steps to improve its due diligence and mitigate any risk that the 3TG Minerals in the Covered Products could benefit armed groups in the Covered Countries:

- Continue to follow up with suppliers who have not responded or have submitted incomplete responses to the Conflict Minerals Survey, clarify any issues and encourage responses;
- Continue to encourage suppliers that provided company level information in their prior responses to the Conflict Minerals Survey to provide product level information through ongoing outreach with these suppliers;

- Continue to encourage our suppliers to implement responsible sourcing of 3TG Minerals; and
- Continue to encourage our suppliers to require the smelters and refiners in their supply chain to obtain conflict-free designations from an independent, third party auditor.

Annex A

Smelter and Refiner Information

| Metal | Name of Smelter or Refiner | Smelter or Refiner Status* |
|--------------|---|-----------------------------------|
| Gold | Advanced Chemical Company | RMAP Conformant Smelter |
| Gold | Aida Chemical Industries Co., Ltd. | RMAP Conformant Smelter |
| Gold | Allgemeine Gold-und Silberscheideanstalt A.G. | RMAP Conformant Smelter |
| Gold | Almalyk Mining and Metallurgical Complex (AMMC) | RMAP Conformant Smelter |
| Gold | AngloGold Ashanti Corrego do Sitio Mineracao | RMAP Conformant Smelter |
| Gold | Argor-Heraeus S.A. | RMAP Conformant Smelter |
| Gold | Asahi Pretec Corp. | RMAP Conformant Smelter |
| Gold | Asaka Riken Co., Ltd. | RMAP Conformant Smelter |
| Gold | Aurubis AG | RMAP Conformant Smelter |
| Gold | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | RMAP Conformant Smelter |
| Gold | Boliden AB | RMAP Conformant Smelter |
| Gold | C. Hafner GmbH + Co. KG | RMAP Conformant Smelter |
| Gold | CCR Refinery - Glencore Canada Corporation | RMAP Conformant Smelter |
| Gold | Cendres + Metaux S.A. | RMAP Conformant Smelter |
| Gold | Chimet S.p.A. | RMAP Conformant Smelter |
| Gold | Chugai Mining | RMAP Conformant Smelter |
| Gold | DSC (Do Sung Corporation) | RMAP Conformant Smelter |
| Gold | DODUCO Contacts and Refining GmbH | RMAP Conformant Smelter |
| Gold | Dowa | RMAP Conformant Smelter |
| Gold | Eco-System Recycling Co., Ltd. East Plant | RMAP Conformant Smelter |
| Gold | JSC Novosibirsk Refinery | Not Applicable |
| Gold | LT Metal Ltd. | RMAP Conformant Smelter |
| Gold | Heimerle + Meule GmbH | RMAP Conformant Smelter |
| Gold | Heraeus Metals Hong Kong Ltd. | RMAP Conformant Smelter |
| Gold | Heraeus Germany GmbH Co. KG | RMAP Conformant Smelter |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | RMAP Conformant Smelter |
| Gold | Ishifuku Metal Industry Co., Ltd. | RMAP Conformant Smelter |
| Gold | Istanbul Gold Refinery | RMAP Conformant Smelter |
| Gold | Japan Mint | RMAP Conformant Smelter |
| Gold | Jiangxi Copper Co., Ltd. | RMAP Conformant Smelter |
| Gold | Asahi Refining USA Inc. | RMAP Conformant Smelter |
| Gold | Asahi Refining Canada Ltd. | RMAP Conformant Smelter |
| Gold | JSC Uralelectromed | Not Applicable |
| Gold | JX Nippon Mining & Metals Co., Ltd. | RMAP Conformant Smelter |

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| Gold | Kazzinc | RMAP Conformant Smelter |
| Gold | Kennecott Utah Copper LLC | RMAP Conformant Smelter |
| Gold | Kojima Chemicals Co., Ltd. | RMAP Conformant Smelter |
| Gold | Kyrgyzaltyn JSC | Not Applicable |
| Gold | LS-NIKKO Copper Inc. | RMAP Conformant Smelter |
| Gold | Materion | RMAP Conformant Smelter |
| Gold | Matsuda Sangyo Co., Ltd. | RMAP Conformant Smelter |
| Gold | Metalor Technologies (Suzhou) Ltd. | RMAP Conformant Smelter |
| Gold | Metalor Technologies (Hong Kong) Ltd. | RMAP Conformant Smelter |
| Gold | Metalor Technologies (Singapore) Pte., Ltd. | RMAP Conformant Smelter |
| Gold | Metalor Technologies S.A. | RMAP Conformant Smelter |
| Gold | Metalor USA Refining Corporation | RMAP Conformant Smelter |
| Gold | Metalurgica Met-Mex Penoles S.A. De C.V. | RMAP Conformant Smelter |
| Gold | Mitsubishi Materials Corporation | RMAP Conformant Smelter |
| Gold | Mitsui Mining and Smelting Co., Ltd. | RMAP Conformant Smelter |
| Gold | Moscow Special Alloys Processing Plant | Not Applicable |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.S. | RMAP Conformant Smelter |
| Gold | Navoi Mining and Metallurgical Combinat | RMAP Conformant Smelter |
| Gold | Nihon Material Co., Ltd. | RMAP Conformant Smelter |
| Gold | Ohura Precious Metal Industry Co., Ltd. | RMAP Conformant Smelter |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | Not Applicable |
| Gold | PAMP S.A. | RMAP Conformant Smelter |
| Gold | Prioksky Plant of Non-Ferrous Metals | Not Applicable |
| Gold | PT Aneka Tambang (Persero) Tbk | RMAP Conformant Smelter |
| Gold | PX Precinox S.A. | RMAP Conformant Smelter |
| Gold | Rand Refinery (Pty) Ltd. | RMAP Conformant Smelter |
| Gold | Royal Canadian Mint | RMAP Conformant Smelter |
| Gold | Samduck Precious Metals | RMAP Conformant Smelter |
| Gold | SEMPSA Joyeria Plateria S.A. | RMAP Conformant Smelter |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd. | RMAP Conformant Smelter |
| Gold | Sichuan Tianze Precious Metals Co., Ltd. | RMAP Conformant Smelter |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals | Not Applicable |
| Gold | Solar Applied Materials Technology Corp. | RMAP Conformant Smelter |
| Gold | Sumitomo Metal Mining Co., Ltd. | RMAP Conformant Smelter |
| Gold | Tanaka Kikinzoku Kogyo K.K. | RMAP Conformant Smelter |
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM | Not Applicable |
| Gold | Shandong Gold Smelting Co., Ltd. | RMAP Conformant Smelter |
| Gold | Tokuriki Honten Co., Ltd. | RMAP Conformant Smelter |
| Gold | Torecom | RMAP Conformant Smelter |
| Gold | Umicore S.A. Business Unit Precious Metals Refining | RMAP Conformant Smelter |
| Gold | United Precious Metal Refining, Inc. | RMAP Conformant Smelter |
| Gold | Valcambi S.A. | RMAP Conformant Smelter |
| Gold | Western Australian Mint (T/a The Perth Mint) | RMAP Conformant Smelter |

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| Gold | Yamakin Co., Ltd. | RMAP Conformant Smelter |
| Gold | Yokohama Metal Co., Ltd. | RMAP Conformant Smelter |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | RMAP Conformant Smelter |
| Gold | Gold Refinery of Zijin Mining Group Co., Ltd. | RMAP Conformant Smelter |
| Gold | SAFINA A.S. | RMAP Conformant Smelter |
| Gold | Umicore Precious Metals Thailand | RMAP Conformant Smelter |
| Gold | Geib Refining Corporation | RMAP Conformant Smelter |
| Gold | MMTC-PAMP India Pvt., Ltd. | RMAP Conformant Smelter |
| Gold | KGHM Polska Miedz Spolka Akcyjna | RMAP Conformant Smelter |
| Gold | Singway Technology Co., Ltd. | RMAP Conformant Smelter |
| Gold | Al Etihad Gold Refinery DMCC | RMAP Conformant Smelter |
| Gold | Emirates Gold DMCC | RMAP Conformant Smelter |
| Gold | T.C.A S.p.A | RMAP Conformant Smelter |
| Gold | REMONDIS PMR B.V. | RMAP Conformant Smelter |
| Gold | Shirpur Gold Refinery Ltd. | Not Applicable |
| Gold | Korea Zinc Co., Ltd. | RMAP Conformant Smelter |
| Gold | Marsam Metals | RMAP Conformant Smelter |
| Gold | TOO Tau-Ken-Altyn | RMAP Conformant Smelter |
| Gold | SAAMP | RMAP Conformant Smelter |
| Gold | L'Orfebre S.A. | RMAP Conformant Smelter |
| Gold | 8853 S.p.A. | RMAP Conformant Smelter |
| Gold | Italpreziosi | RMAP Conformant Smelter |
| Gold | SAXONIA Edelmetalle GmbH | Not Applicable |
| Gold | WIELAND Edelmetalle GmbH | RMAP Conformant Smelter |
| Gold | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH | RMAP Conformant Smelter |
| Gold | AU Traders and Refiners | Not Applicable |
| Gold | Bangalore Refinery | RMAP Conformant Smelter |
| Gold | SungEel HiMetal Co., Ltd. | RMAP Conformant Smelter |
| Gold | Planta Recuperadora de Metales SpA | RMAP Conformant Smelter |
| Gold | Safimet S.p.A | RMAP Conformant Smelter |
| Gold | TSK Pretech | Not Applicable |
| Gold | C.I Metales Procesados Industriales SAS | RMAP Active Smelter |
| Gold | Eco-System Recycling Co., Ltd. North Plant | RMAP Conformant Smelter |
| Gold | Eco-System Recycling Co., Ltd. West Plant | RMAP Conformant Smelter |
| Gold | Kundan Care Products Ltd. | Not Applicable |
| Tantalum | Asaka Riken Co., Ltd. | RMAP Conformant Smelter |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd. | RMAP Conformant Smelter |
| Tantalum | Guangdong Rising Rare Metals-EO Materials Ltd. | RMAP Conformant Smelter |
| Tantalum | Exotech Inc. | Not Applicable |
| Tantalum | F&X Electro-Materials Ltd. | RMAP Conformant Smelter |
| Tantalum | XIMEI RESOURCES (GUANGDONG) LIMITED | RMAP Conformant Smelter |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd. | RMAP Conformant Smelter |
| Tantalum | Jiujiang Tanbre Co., Ltd. | RMAP Conformant Smelter |

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| Tantalum | LSM Brasil S.A. | RMAP Conformant Smelter |
| Tantalum | Metallurgical Products India Pvt., Ltd. | RMAP Conformant Smelter |
| Tantalum | Mineracao Taboca S.A. | RMAP Conformant Smelter |
| Tantalum | Mitsui Mining and Smelting Co., Ltd. | RMAP Conformant Smelter |
| Tantalum | NPM Silmet AS | RMAP Conformant Smelter |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd. | RMAP Conformant Smelter |
| Tantalum | QuantumClean | RMAP Conformant Smelter |
| Tantalum | Yanling Jincheng Tantalum & Niobium Co., Ltd. | RMAP Conformant Smelter |
| Tantalum | Solikamsk Magnesium Works OAO | RMAP Conformant Smelter |
| Tantalum | Taki Chemical Co., Ltd. | RMAP Conformant Smelter |
| Tantalum | Telex Metals | RMAP Conformant Smelter |
| Tantalum | Ulba Metallurgical Plant JSC | RMAP Conformant Smelter |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd. | RMAP Conformant Smelter |
| Tantalum | D Block Metals, LLC | RMAP Conformant Smelter |
| Tantalum | FIR Metals & Resource Ltd. | RMAP Conformant Smelter |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd. | RMAP Conformant Smelter |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd. | RMAP Conformant Smelter |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd. | RMAP Conformant Smelter |
| Tantalum | KEMET de Mexico | RMAP Conformant Smelter |
| Tantalum | TANIOBIS Co., Ltd. | RMAP Conformant Smelter |
| Tantalum | TANIOBIS GmbH | RMAP Conformant Smelter |
| Tantalum | H.C. Starck Hermsdorf GmbH | RMAP Conformant Smelter |
| Tantalum | H.C. Starck Inc. | RMAP Conformant Smelter |
| Tantalum | TANIOBIS Japan Co., Ltd. | RMAP Conformant Smelter |
| Tantalum | TANIOBIS Smelting GmbH & Co. KG | RMAP Conformant Smelter |
| Tantalum | Global Advanced Metals Boyertown | RMAP Conformant Smelter |
| Tantalum | Resind Industria e Comercio Ltda. | RMAP Conformant Smelter |
| Tantalum | Jiangxi Tuohong New Raw Material | RMAP Conformant Smelter |
| Tantalum | Meta Materials | RMAP Conformant Smelter |
| Tin | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | RMAP Conformant Smelter |
| Tin | Alpha | RMAP Conformant Smelter |
| Tin | PT Aries Kencana Sejahtera | RMAP Active Smelter |
| Tin | Dowa | RMAP Conformant Smelter |
| Tin | EM Vinto | RMAP Conformant Smelter |
| Tin | Estanho de Rondonia S.A. | RMAP Conformant Smelter |
| Tin | Fenix Metals | RMAP Conformant Smelter |
| Tin | Gejiu Non-Ferrous Metal Processing Co., Ltd. | RMAP Conformant Smelter |
| Tin | Gejiu Zili Mining and Metallurgy Co., Ltd. | RMAP Conformant Smelter |
| Tin | Huichang Jinshunda Tin Co., Ltd. | Not Applicable |
| Tin | Gejiu Kai Meng Industry and Trade LLC | Not Applicable |
| Tin | China Tin Group Co., Ltd. | RMAP Conformant Smelter |
| Tin | Malaysia Smelting Corporation (MSC) | RMAP Conformant Smelter |
| Tin | Metallic Resources, Inc. | RMAP Conformant Smelter |

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| Tin | Mineracao Taboca S.A. | RMAP Conformant Smelter |
| Tin | Minsur | RMAP Conformant Smelter |
| Tin | Mitsubishi Materials Corporation | RMAP Conformant Smelter |
| Tin | Jiangxi New Nanshan Technology Ltd. | RMAP Conformant Smelter |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd. | RMAP Conformant Smelter |
| Tin | Operaciones Metalurgicas S.A. | RMAP Conformant Smelter |
| Tin | PT Artha Cipta Langgeng | RMAP Conformant Smelter |
| Tin | PT Babel Inti Perkasa | RMAP Conformant Smelter |
| Tin | PT Babel Surya Alam Lestari | RMAP Conformant Smelter |
| Tin | Brand IMLI | RMAP Active Smelter |
| Tin | PT Mitra Stania Prima | RMAP Conformant Smelter |
| Tin | PT Prima Timah Utama | RMAP Conformant Smelter |
| Tin | PT Refined Bangka Tin | RMAP Conformant Smelter |
| Tin | PT Sariwiguna Binasentosa | RMAP Conformant Smelter |
| Tin | PT Stanindo Inti Perkasa | RMAP Conformant Smelter |
| Tin | PT Timah Tbk Kundur | RMAP Conformant Smelter |
| Tin | PT Timah Tbk Mentok | RMAP Conformant Smelter |
| Tin | PT Timah Nusantara | RMAP Active Smelter |
| Tin | PT Tinindo Inter Nusa | RMAP Conformant Smelter |
| Tin | Rui Da Hung | RMAP Conformant Smelter |
| Tin | Soft Metais Ltda. | RMAP Conformant Smelter |
| Tin | Thaisarco | RMAP Conformant Smelter |
| Tin | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | RMAP Conformant Smelter |
| Tin | White Solder Metalurgia e Mineracao Ltda. | RMAP Conformant Smelter |
| Tin | Yunnan Chengfeng Non-ferrous Metals Co., Ltd. | RMAP Conformant Smelter |
| Tin | Yunnan Tin Company Limited | RMAP Conformant Smelter |
| Tin | CV Venus Inti Perkasa | RMAP Active Smelter |
| Tin | Magnu's Minerais Metais e Ligas Ltda. | RMAP Conformant Smelter |
| Tin | Melt Metais e Ligas S.A. | Not Applicable |
| Tin | PT ATD Makmur Mandiri Jaya | RMAP Conformant Smelter |
| Tin | O.M. Manufacturing Philippines, Inc. | RMAP Conformant Smelter |
| Tin | Huichang Jinshunda Tin Co., Ltd. | RMAP Conformant Smelter |
| Tin | PT Rajehan Ariq | RMAP Conformant Smelter |
| Tin | Resind Industria e Comercio Ltda. | RMAP Conformant Smelter |
| Tin | Metallo Belgium N.V. | RMAP Conformant Smelter |
| Tin | Metallo Spain S.L.U. | RMAP Conformant Smelter |
| Tin | PT Bangka Prima Tin | Not Applicable |
| Tin | PT Sukses Inti Makmur | RMAP Active Smelter |
| Tin | Thai Nguyen Mining and Metallurgy Co., Ltd. | RMAP Conformant Smelter |
| Tin | PT Menara Cipta Mulia | RMAP Conformant Smelter |
| Tin | HuiChang Hill Tin Industry Co., Ltd. | RMAP Conformant Smelter |
| Tin | Gejiu Fengming Metallurgy Chemical Plant | Not Applicable |
| Tin | Guangdong Hanhe Non-Ferrous Metal Co., Ltd. | RMAP Conformant Smelter |

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| Tin | Chifeng Dajingzi Tin Industry Co., Ltd. | RMAP Conformant Smelter |
| Tin | PT Bangka Serumpun | RMAP Conformant Smelter |
| Tin | Tin Technology & Refining | RMAP Conformant Smelter |
| Tin | Ma'anshan Weitai Tin Co., Ltd. | RMAP Conformant Smelter |
| Tin | PT Rajawali Rimba Perkasa | RMAP Conformant Smelter |
| Tin | Luna Smelter, Ltd. | RMAP Conformant Smelter |
| Tin | Yunnan Yunfan Non-ferrous Metals Co., Ltd. | Not Applicable |
| Tin | PT Mitra Sukses Globalindo | RMAP Active Smelter |
| Tungsten | A.L.M.T. Corp. | RMAP Conformant Smelter |
| Tungsten | Kennametal Huntsville | RMAP Conformant Smelter |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd. | RMAP Conformant Smelter |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd. | RMAP Conformant Smelter |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd. | Not Applicable |
| Tungsten | Global Tungsten & Powders Corp. | RMAP Conformant Smelter |
| Tungsten | Hunan Chenzhou Mining Co., Ltd. | RMAP Conformant Smelter |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd. | RMAP Conformant Smelter |
| Tungsten | Japan New Metals Co., Ltd. | RMAP Conformant Smelter |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd. | RMAP Conformant Smelter |
| Tungsten | Kennametal Fallon | RMAP Conformant Smelter |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd. | Not Applicable |
| Tungsten | Wolfram Bergbau und Hutten AG | RMAP Conformant Smelter |
| Tungsten | Xiamen Tungsten Co., Ltd. | RMAP Conformant Smelter |
| Tungsten | ZhuZhou Cemented Carbide Goup CO., | Not Applicable |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd. | RMAP Conformant Smelter |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd. | RMAP Conformant Smelter |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd. | RMAP Conformant Smelter |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | RMAP Conformant Smelter |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd. | RMAP Conformant Smelter |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd. | RMAP Conformant Smelter |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd. | RMAP Conformant Smelter |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd. | RMAP Conformant Smelter |
| Tungsten | Asia Tungsten Products Vietnam Ltd. | RMAP Conformant Smelter |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd. | RMAP Conformant Smelter |
| Tungsten | H.C. Starck Tungsten GmbH | RMAP Conformant Smelter |
| Tungsten | TANIOBIS Smelting GmbH & Co. KG | RMAP Conformant Smelter |
| Tungsten | Masan High-Tech Materials | RMAP Conformant Smelter |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd. | RMAP Conformant Smelter |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji | Not Applicable |
| Tungsten | Niagara Refining LLC | RMAP Conformant Smelter |
| Tungsten | China Molybdenum Tungsten Co., Ltd. | RMAP Conformant Smelter |
| Tungsten | Ganzhou Haichuang Tungsten Co., Ltd. | RMAP Conformant Smelter |
| Tungsten | Hydrometallurg, JSC | RMAP Conformant Smelter |
| Tungsten | Unecha Refractory metals plant | RMAP Conformant Smelter |

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| Tungsten | Philippine Chuangxin Industrial Co., Inc. | RMAP Conformant Smelter |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd. | RMAP Conformant Smelter |
| Tungsten | ACL Metais Eireli | RMAP Conformant Smelter |
| Tungsten | Woltech Korea Co., Ltd. | RMAP Conformant Smelter |
| Tungsten | Moliren Ltd. | RMAP Conformant Smelter |
| Tungsten | Hunan Litian Tungsten Industry Co., Ltd. | Not Applicable |
| Tungsten | KGETS Co., Ltd. | RMAP Conformant Smelter |
| Tungsten | Fujian Ganmin RareMetal Co., Ltd. | RMAP Conformant Smelter |
| Tungsten | Lianyou Metals Co., Ltd. | RMAP Conformant Smelter |
| Tungsten | JSC "Kirovgrad Hard Alloys Plant" | RMAP Conformant Smelter |
| Tungsten | Albasteel Industria e Comercio de Ligas Para Fundicao Ltd. | RMAP Active Smelter |

* The information in this column is based on smelter or refiner information made publicly available by RMI as of April 20, 2022. The terms used have the following meanings:

- “RMAP Conformant Smelter” means that a smelter or refiner has been listed as “conformant” by the Responsible Minerals Assurance Process (“RMAP”) assessment protocols, including through mutual recognition and those indicated as “Re-audit in process” by the RMAP.
- “RMAP Active Smelter” is a RMAP designation that means that the smelter or refiner is a participant in the RMAP and has committed to undergo an audit or is participating in one of a cross-recognized certification programs such as LBMA Responsible Gold Certification or Responsible Jewelry Program Chain-of-Custody Certification.
- “Not Applicable” means that the smelter or refiner is listed on the RMI Smelter Look-up tab of the Conflict Minerals Survey but is not listed as “Conformant” or “Active.”