

**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION**

**Washington, D.C. 20549**

**FORM SD  
Specialized Disclosure Report**

**HASBRO, INC.**

(Exact name of registrant as specified in its charter)

**Rhode Island**

(State or other jurisdiction of incorporation or  
organization)

**1-6682**

(Commission File Number)

**05-0155090**

(IRS Employer Identification No.)

**1027 Newport Avenue, Pawtucket, Rhode  
Island**

(Address of principal executive offices)

**02861**

(Zip code)

**Gina Goetter, Executive Vice President and Chief Financial Officer, (401) 431-8697**

(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, 2023 to December 31, 2023.

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

## Introduction:

Hasbro, Inc. ("Hasbro") is a leading game, toy and intellectual property company whose mission is to entertain and connect generations of fans through exhilaration of play and the wonder of storytelling. We are "Creating Magic Through Play" by delivering engaging brand experiences for global audiences across gaming, consumer products and entertainment, with a portfolio of iconic brands including MAGIC: THE GATHERING, Hasbro Gaming, PLAY-DOH, NERF, TRANSFORMERS, DUNGEONS & DRAGONS, and PEPPA PIG, as well as premier partner brands.

We are guided by our purpose to create joy and community for all people around the world, one game, one toy, one story at a time. For more than a decade, we have been consistently recognized for our corporate citizenship, including being named one of the 100 Best Corporate Citizens by 3BL Media.

Some of Hasbro's products include electronics and other components that contain tin, tungsten, tantalum and/or gold (referred to collectively hereafter as "Conflict Minerals" or "3TG"). Accordingly, we are subject to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (the "Dodd-Frank Act" or the "Act") and Rule 13p-1 under the Securities Exchange Act of 1934 (the "Conflict Minerals Rule").

We have a Conflict Minerals Policy that is communicated to all of our suppliers and which expresses our commitment to (i) sourcing components and materials from companies that share our values around human rights, ethics and corporate social responsibility, (ii) utilizing due diligence practices to identify 3TG and their sources in our supply chain and (iii) requiring that any 3TG included in our products are sourced from smelters and refiners ("Smelters") that have been identified as conformant by the Responsible Minerals Assurance Process (RMAP) in order to mitigate the possibility that such 3TG are being used to support armed conflict in the Democratic Republic of the Congo and the adjoining countries (Covered Countries<sup>1</sup>).

Our policy does not preclude suppliers from sourcing validated conflict-free minerals from the DRC or the adjoining countries. To the extent that we identify non-conformance with our policy, we send corrective action letters to the contract manufacturers requiring them to: (a) contact the identified Smelters and require that they participate in the conflict minerals audit program; and/or (b) require the contract manufacturer to remove non-conformant Smelters from their supply chain for Hasbro products. Hasbro's Conflicts Minerals Policy can be found at the following internet address:

[https://csr.hasbro.com/en-us/news/policy?id=csr\\_conflict\\_minerals\\_policy](https://csr.hasbro.com/en-us/news/policy?id=csr_conflict_minerals_policy).

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<sup>1</sup> The Democratic Republic of Congo and its adjoining countries (Angola, Burundi, Republic of the Congo, Central African Republic, Rwanda, South Sudan, Republic of Tanzania, Uganda and Zambia).

## **Section 1 – Conflict Minerals Disclosures**

### **Item 1.01 Conflict Minerals Disclosure and Report**

We have determined that during the 2023 calendar year, we contracted to manufacture certain products containing 3TG necessary to the functionality or production of these products. We conducted a Reasonable Country of Origin Inquiry ("RCOI") to assess whether the necessary 3TG in our products originated from the Covered Countries.

During 2023, all of our products were manufactured in third-party vendor or owned facilities (referred to hereafter as "contract manufacturers"). Many of our contract manufacturers are located in the People's Republic of China. We also use contract manufacturers located in other countries, such as India, Vietnam, Mexico, Japan, Europe, and the United States. Over the past several years, we have continued to diversify our supply chain.

Under our RCOI methodology, we undertook an applicability assessment to identify the products containing 3TG and the relevant contract manufacturers of those products. To identify the applicable contract manufacturers, Hasbro filtered out contract manufacturers supplying Hasbro with products identified not to contain 3TG after a thorough review. Following the applicability assessment, Hasbro sent surveys to all of its contract manufacturers globally that were identified as producing products that could contain 3TG.

Utilizing the methodology above and based on the information provided by our business units and gathered from our sourcing and technology systems and records, in 2023, we identified a total of 26 relevant contract manufacturers that are producing products that could contain 3TG. All 26 of these contract manufacturers were surveyed using a third-party technology platform that employs the Conflict Minerals Reporting Template (CMRT) developed by the Responsible Minerals Initiative (RMI). The contract manufacturers completed a CMRT survey for products they supplied to us. Of the 26 contract manufacturers surveyed, 100% completed the CMRT. A complete list of Smelters reported by our contract manufacturers is attached as an exhibit to our Conflict Minerals Report.

We conduct training as needed with our contract manufacturers identified as using 3TG, to educate these manufacturers on the requirements of the Act and our sourcing policies related to conflict minerals and to help them understand the importance of conducting due diligence on the sourcing of the 3TG used in our products. We have developed, produced, and conducted a training program that provides a summary of the law related to conflict minerals, our obligations under the Act and the Conflict Minerals Rule, as well as the role of our contract manufacturers in assisting us to comply with the requirements of the Conflict Minerals Rule. In 2023, Hasbro conducted virtual one-on-one training sessions with those contract manufacturers that needed the training. The training materials and presentations were provided in the local language and were enhanced to clarify due diligence and legal reporting requirements. Manufacturers can contact Hasbro via email to Hasbro's designated sourcing organization and may also contact the third-party technology provider about the Conflict Minerals Rule or seek assistance in completing the Conflict Minerals survey using the CMRT.

As is discussed in the attached Conflicts Minerals Report, we are currently unable to determine the specific mine location or the country of origin for all of the 3TG used in our products. Based on our RCOI, we believe some of the 3TG used in our products originated in the Covered Countries. However, at this point we cannot make a determination about the source of all the 3TG in our products or components. Accordingly, we conducted due diligence on the source and chain of custody of the necessary conflict minerals we believe may be contained in our products as described in the Conflict Minerals Report included as Exhibit 1.01.

### **Item 1.02 Exhibit**

In accordance with Rule 13p-1 under the Securities Exchange Act of 1934 ("Rule 13p-1"), this Specialized Disclosure Form ("Form SD") and the associated Conflict Minerals Report are posted to a publicly available Internet site at the following internet address: <http://csr.hasbro.com/has23-conflict-minerals-report>.

**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.](#)

**Signature**

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.

Hasbro, Inc. (Registrant)

By: /s/ Gina Goetter

Gina Goetter

Executive Vice President and Chief Financial  
Officer

(Signature and Title)

May 24, 2024

(Date)

## **Exhibit 1.01 – Conflict Minerals Report (CMR)**

### **Conflict Minerals Report of Hasbro, Inc.**

#### **Section 1: Introduction**

This is the Conflict Minerals Report of Hasbro, Inc. (herein referred to as "Hasbro," the Company, "we," "us," or "our ") for calendar year 2023 in accordance with Rule 13p-1 under the Securities Exchange Act of 1934 ("Rule 13p-1"). Certain terms in this report are defined in Rule 13p-1 and Form SD and the reader is invited to refer to those sources for complete definitions of these terms.

During 2023, Hasbro marketed products based on owned, controlled, and licensed intellectual properties within our brand architecture under the following brand categories, each of which may include products containing 3TG: (1) Franchise Brands; (2) Partner Brands; and (3) Portfolio Brands.

**Franchise Brands:** During 2023, Franchise Brands were comprised of Hasbro's flagship owned or controlled brands, which we believe can deliver significant revenues, profits, and growth over the long-term. Our seven Franchise Brands in 2023 were MAGIC: THE GATHERING, Hasbro Gaming, PLAY-DOH, NERF, TRANSFORMERS, DUNGEONS & DRAGONS and PEPPA PIG.

**Partner Brands:** During 2023, Partner Brands included those brands we licensed from other parties for which we developed toy and game products. Significant Partner Brands in 2023 included MARVEL, including SPIDER-MAN and THE AVENGERS, LUCASFILMS' STAR WARS, BEYBLADE, GHOSTBUSTERS and INDIANA JONES. Partner brands MARVEL, STAR WARS and INDIANA JONES are all owned by The Walt Disney Company ("Disney").

**Portfolio Brands:** During 2023, Portfolio Brands included those brands we own or control which we believe have upside in revenue and profitability that have not yet grown to the significance of a Franchise Brand

#### **Section 2: Due diligence framework**

Hasbro designed its due diligence measures to conform, in all material respects, with the internationally recognized due diligence framework as set forth in the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition ("OECD Framework").

#### **Section 3: Due diligence measures undertaken**

Hasbro's due diligence efforts for 2023 continued to include the following steps in alignment with the OECD Framework:

## **Establish company management systems**

- Communicated our conflict minerals policy to all contract manufacturers, ensuring they were made aware that Hasbro's policy does not preclude them from sourcing conflict free minerals from the Covered Countries, but is intended to encourage responsible sourcing. To summarize our conflict minerals policy, Hasbro requires suppliers to fully respond to our information requests, provide a list of smelter or refiner ("Smelters") names, source from conflict free Smelters as determined by a third-party audit program such as the Responsible Minerals Initiative (RMI), London Bullion Market Association, Responsible Jewelry Council or any other recognized equivalent, and initiate contact with non-audited Smelters to persuade such Smelters to undergo a Responsible Minerals Assurance Process ("RMAP") audit of their due diligence practices.
- Operated under our internal governance structure, which is overseen by members of our senior management team and includes a cross functional conflict minerals steering committee and working group comprised of representatives from the Global Regulatory Affairs, ESG, Global Sourcing, Legal, Finance and Internal Audit functions of Hasbro.
- Provided surveyed contract manufacturers with training presentations as necessary, which included an overview of the conflict minerals rule under the Dodd-Frank Act and information on how to complete the survey. The communication and training of our policy and the conflict minerals rules specified that contract manufacturers should not ban sourcing 3TG from the Covered Countries in order to maintain support of socio-economic regional development, so long as the contract manufacturers are utilizing only conformant Smelters. In addition, Hasbro directly reviewed a sample of contract manufacturer conflict minerals policies to ensure that they included the minimum policy requirements and did not ban minerals from the Covered Countries.
- Engaged with contract manufacturers that Hasbro believed supply products containing 3TG, informing them that Hasbro is subject to Section 1502 of the Dodd Frank Act and that their cooperation in responding to the survey is required.
- Conducted supply chain surveys using a third-party platform based on the RMI Conflict Minerals Reporting Template (CMRT). Surveys were sent to the 26 contract manufacturers of products identified during our applicability assessment as potentially containing 3TG.
- Engaged as necessary with unaudited Smelters by sending a letter requiring that they undergo the RMI audit process in order to demonstrate compliance with the Hasbro Conflict Minerals policy.
- Maintained our grievance mechanism to enable the reporting of grievances via the Hasbro Conflict Minerals email box.
- Maintained our policy of retaining conflict minerals program documentation for 5 years.

## **Identify and assess risks in the supply chain**

- In the survey, Contract manufacturers were asked to identify Smelters that process conflict minerals contained in our products, including country of origin of the 3TG, based on the RMI

CMRT. Hasbro required these contract manufacturers to provide information on Hasbro products only (“product-level declarations”).

- Every survey was entered into our third-party technology platform and then reviewed by the technology platform, a third-party consultant and, where deemed necessary, Hasbro personnel.
- Non-responsive contract manufacturers and survey responses that we believed to be incomplete or inconsistent were identified. We worked with the suppliers and have received responses from all of them.
- Reasons for follow-up with contract manufacturers included, but were not limited to, that the contract manufacturer did not provide a complete or accurate Smelter list, did not receive complete 3TG sourcing information from all of its relevant suppliers, the response was not specific to Hasbro products only, or inconsistencies were identified in the answers contract manufacturers provided within the survey.
- Smelters identified by contract manufacturers surveyed by Hasbro were compared against lists maintained by the technology platform provider, the current Smelter lists from the RMAP and our external consultant. This was done to confirm the validity of Smelters and the plausibility of the countries of origin.
- Reviewed contract manufacturers policies and procedures directly, in addition to conducting Responsible Business Alliance (RBA) audits, in order to ensure they meet minimum requirements.

#### **Design and implement a strategy to respond to identified risks**

- Executive members of the steering committee met three times during the 2023 conflict minerals due diligence period to review the results of the applicability assessment, survey review and associated risks.
- All contract manufacturers responded to Hasbro's initial survey request. In cases where additional follow-up was needed, emails were sent by the technology platform, by our third-party consultant and contact was made by Hasbro management to address issues regarding their survey responses.
- Contract manufacturers that provided survey responses identifying Smelters not on the RMI’s active or compliant Smelter lists were sent corrective action letters, as necessary, noting that Hasbro requires them to source 3TG from RMAP-compliant Smelters. In the corrective action letters, Hasbro requested that contract manufacturers that source from non-RMAP-compliant Smelters verify if the Smelters are in the Hasbro supply chain. If the Smelter was not in the supply chain, they were required to update their response and remove the Smelter from their list. If the Smelter was in the supply chain, contract manufacturers were instructed to contact the respective Smelters and require them to participate in a recognized conflict minerals audit program and provide documentation of this to Hasbro. If they were not able to obtain Smelter cooperation, the contract manufacturers were reminded of the Hasbro conflict minerals sourcing policy and requirement to remove the unaudited Smelter from their supply chain for Hasbro Products.



### Carry out independent third-party audit of Smelter due diligence practices

Hasbro is a downstream consumer of 3TG and is many steps removed from Smelters that provide minerals and ores. Hasbro does not purchase raw minerals or ores and does not directly purchase 3TG. Therefore, Hasbro does not perform or direct audits of Smelters within the supply chain. Rather, as a member of the RMI we rely on and support the audits carried out by that organization. Those audits confirm that Smelters conform to the OECD Framework for their own sourcing practices by reviewing the Smelter sourcing/conflict minerals policy and verifying implementation.

### Report annually on supply chain due diligence

This report and the associated Form SD are available online at the following internet address: <http://csr.hasbro.com/has23-conflict-minerals-report>.

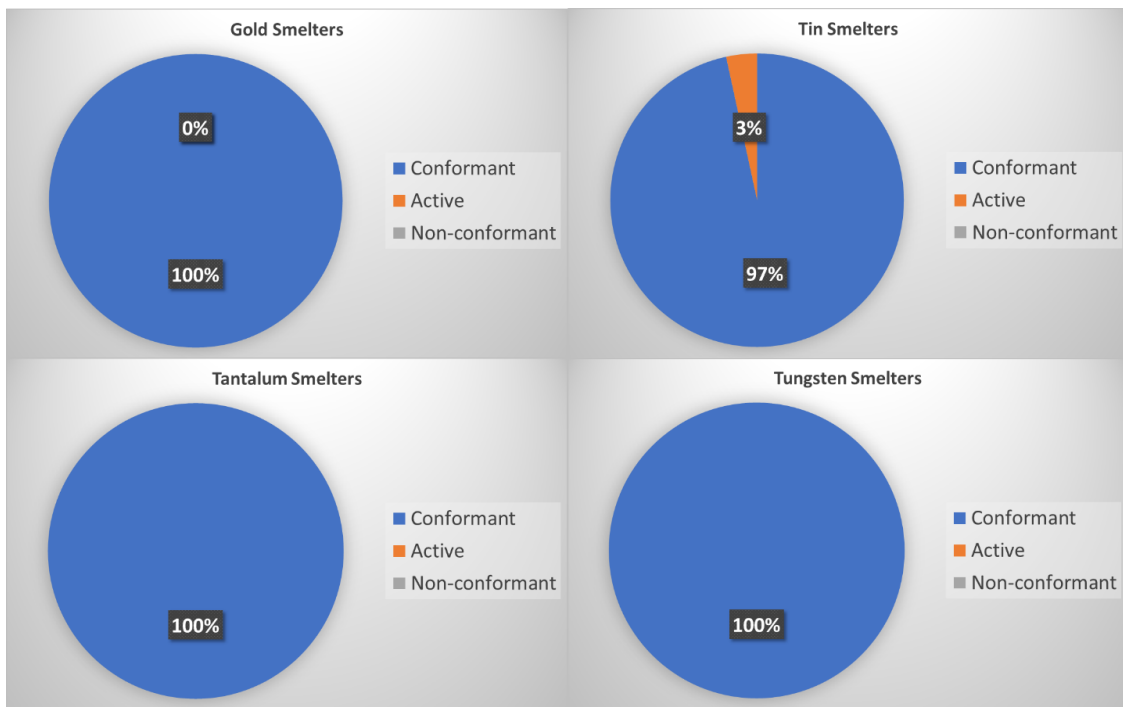
### Section 4: Determination

Based on the due diligence described above for 2023, Hasbro was able to determine that some 3TG used by our contract manufacturers for Hasbro products originated in the Covered Countries and/or did not originate from recycled or scrap sources.

As a downstream consumer of 3TG, Hasbro must rely on its contract manufacturers to gather information about Smelters in the supply chain. Hasbro received responses from 100% of the contract manufacturers it surveyed (the survey included all 26 contract manufacturers identified as potentially incorporating 3TG into products supplied to Hasbro). The relevant contract manufacturers declared a total of 208 unique Smelter names as the source of 3TG in Hasbro products in 2023. Of the 208 declared Smelters, 100% were designated as conformant or active under the RMAP for 2023. However, we are unable to link specific Smelters to our applicable products. As of this filing, all smelters identified as operational in our supply chain were RMAP conformant or active and all non-conformant smelters have been removed from our supply chain. The results of our due diligence of the 3TG used in our in-scope products are noted below:

| 2023 Smelter   | <i>Tin</i> | <i>Tungsten</i> | <i>Tantalum</i> | <i>Gold</i> | <i>Total</i> |
|--|------------|-----------------|-----------------|-------------|--------------|
| <b>Total number of Smelters</b>                              | <b>59</b>  | <b>31</b>       | <b>32</b>       | <b>86</b>   | <b>208</b>   |
| Number (%) of Smelters listed as conformant or active by RMI | 59 (100%)  | 31 (100%)       | 32 (100%)       | 86 (100%)   | 208 (100%)   |

## Status of Identified Smelters



Set forth in Annex 1 is a list of the unique Smelter names disclosed to us by contract manufacturers broken down by metal. Based on the information provided by Hasbro's contract manufacturers, from the RMAP and other sources, Hasbro believes that the countries of origin of the 3TG contained in some of our products might include Covered Countries, and may not originate from recycled or scrap sources, but we are not able to make that determination at this time for all products or sources. The aggregated list of Countries of Origin based on input from RMI, and their Country-of-Origin list and the Smelters reported to us by our contract manufacturers is set forth in Annex 2.

The Hasbro sourcing model is designed to provide Hasbro flexibility to move production of products among contract manufacturers based on contract manufacturer capacities and product demand. Consequently, there may be instances where the same Hasbro branded product is manufactured by multiple contract manufacturers, which increases the complexity in linking a product with specific Smelters.

### **Section 5: Independent audit**

Hasbro has determined that for 2023 an independent private sector audit is not required.

### **Section 6: Continuous Improvement efforts to mitigate risk**

Hasbro took the following steps to improve our program overall, the number and quality of responses in the 2023 compliance period and to mitigate risk that 3TG used in Hasbro products may finance or benefit armed groups in the Covered Countries:

- Achieved a 100% response rate from all applicable contract manufacturers.
- Continued to use contract terms and conditions for new contracts requiring contract manufacturers to respond to inquiries regarding 3TG in a timely manner, such as through incorporation of conflict minerals requirements into Hasbro's Vendor Manual, which is incorporated into Hasbro's Master Agreements with contract manufacturers.
- Rather than relying on contract manufacturers to provide country of origin information, we undertook our own efforts to identify countries of origin using our third-party technology provider. Our external consultant conducted a further plausibility review to ensure that the identified countries have known 3TG ore mining operations or proven mineral reserves.
- Continued to work with contract manufacturers to help them understand the importance of this initiative to Hasbro and to encourage their participation in the conflict minerals survey through trainings for relevant contract manufacturers. In 2023, Hasbro conducted virtual one-on-one training sessions for global in-scope suppliers that needed such training. We believe this resulted in improvements in identifying Smelters applicable to Hasbro.
- In the next compliance period, Hasbro intends to take the following steps to further improve the number and quality of contract manufacturer responses and continue to mitigate the risk that 3TG used in Hasbro products may finance or benefit armed groups in the Covered Countries:
  - Continue to use contract terms and conditions for new contracts requiring contract manufacturers to respond to inquiries regarding conflict minerals in a timely manner.
  - Continue to engage with contract manufacturers, with the objective of maintaining a 100% response rate from all applicable contract manufacturers and obtaining complete lists.
  - Continue to work with contract manufacturers to identify to the extent possible the source of 3TG used in Hasbro's products.
  - Continue to build capabilities with active and new contract manufacturers by helping them understand the importance of this initiative to Hasbro and to encourage their participation through contract manufacturer trainings.
  - Continue to require that any 3TG included in our products be sourced from Smelters that are identified as conformant through the RMAP or an audit program with which RMAP has a mutual recognition agreement.
  - Continue to work with our contract manufacturers to better understand how individual sources of 3TG may apply to our individual product categories.
  - As a result of becoming a full RBA member in October 2016, Hasbro will continue to utilize an annual RBA Validated Audit Process (VAP) audit for 100% of our contract

manufacturers, which includes verifying that a manufacturer has a documented, effective, and communicated conflict minerals policy and management program.

- Continue to emphasize that Hasbro's policy does not preclude contract manufacturers from sourcing conflict free minerals from the DRC and adjoining countries and communicate this policy provision to contract manufacturers.

Certain statements in this Conflict Minerals Report contain "forward-looking statements" within the meaning of the Private Securities Litigation Reform Act of 1995. These forward-looking statements include expectations concerning the Company's future actions to engage contract manufacturers, to identify to the extent possible the source of 3TG in its products and to take other actions regarding its product sourcing. The Company's actual actions or results may differ materially from those expected or anticipated in the forward-looking statements due to both known and unknown risks and uncertainties including, but not limited to, decisions to make changes in the Company's continual improvement efforts and delays or difficulties in engaging contract manufacturers and identifying the source of 3TG contained in the Company's products.

ANNEX I List of the unique Smelter names disclosed to Hasbro by contract manufacturers –  
All smelters were either Conformant or Active per the RMI RMAP process.

| Metal | Official Smelter Name   | RMI Smelter ID | Smelter Country |
|-------|---|----------------|-----------------|
| Gold  | Agosi AG  | CID000035      | DE              |
| Gold  | Aida Chemical Industries Co., Ltd.                              | CID000019      | JP              |
| Gold  | Almalyk Mining and Metallurgical Complex (AMMC)                 | CID000041      | UZ              |
| Gold  | AngloGold Ashanti Corrego do Sitio Mineracao                    | CID000058      | BR              |
| Gold  | Argor-Heraeus S.A.  | CID000077      | CH              |
| Gold  | Asahi Pretec Corp.  | CID000082      | JP              |
| Gold  | Asahi Refining Canada Ltd.                                      | CID000924      | CA              |
| Gold  | Asahi Refining USA Inc.   | CID000920      | US              |
| Gold  | Asaka Riken Co., Ltd.   | CID000090      | JP              |
| Gold  | Aurubis AG  | CID000113      | DE              |
| Gold  | Bangko Sentral ng Pilipinas (Central Bank of the Philippines)   | CID000128      | PH              |
| Gold  | Boliden AB  | CID000157      | SE              |
| Gold  | C. Hafner GmbH + Co. KG   | CID000176      | DE              |
| Gold  | CCR Refinery - Glencore Canada Corporation                      | CID000185      | CA              |
| Gold  | Chimet S.p.A.   | CID000233      | IT              |
| Gold  | Chugai Mining   | CID000264      | JP              |
| Gold  | Dowa  | CID000401      | JP              |
| Gold  | DSC (Do Sung Corporation)                                       | CID000359      | KR              |
| Gold  | Eco-System Recycling Co., Ltd. East Plant                       | CID000425      | JP              |
| Gold  | Eco-System Recycling Co., Ltd. North Plant                      | CID003424      | JP              |
| Gold  | Eco-System Recycling Co., Ltd. West Plant                       | CID003425      | JP              |
| Gold  | Gold Refinery of Zijin Mining Group Co., Ltd.                   | CID002243      | CN              |
| Gold  | Heimerle + Meule GmbH   | CID000694      | DE              |
| Gold  | Heraeus Germany GmbH Co. KG                                     | CID000711      | DE              |
| Gold  | Heraeus Metals Hong Kong Ltd.                                   | CID000707      | CN              |
| Gold  | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | CID000801      | CN              |
| Gold  | Ishifuku Metal Industry Co., Ltd.                               | CID000807      | JP              |
| Gold  | Istanbul Gold Refinery  | CID000814      | TR              |
| Gold  | Italpreziosi  | CID002765      | IT              |
| Gold  | Japan Mint  | CID000823      | JP              |
| Gold  | Jiangxi Copper Co., Ltd.  | CID000855      | CN              |
| Gold  | JX Nippon Mining & Metals Co., Ltd.                             | CID000937      | JP              |
| Gold  | Kazzinc   | CID000957      | KZ              |
| Gold  | Kennecott Utah Copper LLC                                       | CID000969      | US              |
| Gold  | KGHM Polska Miedz Spolka Akcyjna                                | CID002511      | PL              |
| Gold  | Kojima Chemicals Co., Ltd.                                      | CID000981      | JP              |
| Gold  | Korea Zinc Co., Ltd.  | CID002605      | KR              |
| Gold  | L'Orfebre S.A.  | CID002762      | AD              |

|      |   |           |    |
|------|---|-----------|----|
| Gold | LS-NIKKO Copper Inc.  | CID001078 | KR |
| Gold | LT Metal Ltd.   | CID000689 | KR |
| Gold | Materion  | CID001113 | US |
| Gold | Matsuda Sangyo Co., Ltd.                                    | CID001119 | JP |
| Gold | Metal Concentrators SA (Pty) Ltd.                           | CID003575 | ZA |
| Gold | Metalor Technologies (Hong Kong) Ltd.                       | CID001149 | CN |
| Gold | Metalor Technologies (Singapore) Pte., Ltd.                 | CID001152 | SG |
| Gold | Metalor Technologies (Suzhou) Ltd.                          | CID001147 | CN |
| Gold | Metalor Technologies S.A.                                   | CID001153 | CH |
| Gold | Metalor USA Refining Corporation                            | CID001157 | US |
| Gold | Metalurgica Met-Mex Penoles S.A. De C.V.                    | CID001161 | MX |
| Gold | Mitsubishi Materials Corporation                            | CID001188 | JP |
| Gold | Mitsui Mining and Smelting Co., Ltd.                        | CID001193 | JP |
| Gold | MKS PAMP SA   | CID001352 | CH |
| Gold | MMTC-PAMP India Pvt., Ltd.                                  | CID002509 | IN |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.S.                      | CID001220 | TR |
| Gold | Navoi Mining and Metallurgical Combinat                     | CID001236 | UZ |
| Gold | NH Recytech Company   | CID003189 | KR |
| Gold | Nihon Material Co., Ltd.                                    | CID001259 | JP |
| Gold | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH | CID002779 | AT |
| Gold | Ohura Precious Metal Industry Co., Ltd.                     | CID001325 | JP |
| Gold | Planta Recuperadora de Metales SpA                          | CID002919 | CL |
| Gold | PT Aneka Tambang (Persero) Tbk                              | CID001397 | ID |
| Gold | PX Precinox S.A.  | CID001498 | CH |
| Gold | Rand Refinery (Pty) Ltd.                                    | CID001512 | ZA |
| Gold | REMONDIS PMR B.V.   | CID002582 | NL |
| Gold | Royal Canadian Mint   | CID001534 | CA |
| Gold | SAFINA A.S.   | CID002290 | CZ |
| Gold | SEMPSA Joyeria Plateria S.A.                                | CID001585 | ES |
| Gold | Shandong Gold Smelting Co., Ltd.                            | CID001916 | CN |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.           | CID001622 | CN |
| Gold | Sichuan Tianze Precious Metals Co., Ltd.                    | CID001736 | CN |
| Gold | Solar Applied Materials Technology Corp.                    | CID001761 | TW |
| Gold | Sumitomo Metal Mining Co., Ltd.                             | CID001798 | JP |
| Gold | SungEel HiMetal Co., Ltd.                                   | CID002918 | KR |
| Gold | T.C.A S.p.A   | CID002580 | IT |
| Gold | Tanaka Kikinzoku Kogyo K.K.                                 | CID001875 | JP |
| Gold | Tokuriki Honten Co., Ltd.                                   | CID001938 | JP |
| Gold | TOO Tau-Ken-Altyn   | CID002615 | KZ |
| Gold | Torecom   | CID001955 | KR |

|          |  |           |    |
|----------|--|-----------|----|
| Gold     | Umicore S.A. Business Unit Precious Metals Refining  | CID001980 | BE |
| Gold     | United Precious Metal Refining, Inc.                 | CID001993 | US |
| Gold     | Valcambi S.A.  | CID002003 | CH |
| Gold     | Western Australian Mint (T/a The Perth Mint)         | CID002030 | AU |
| Gold     | WIELAND Edelmetalle GmbH                             | CID002778 | DE |
| Gold     | Yamakin Co., Ltd.                                    | CID002100 | JP |
| Gold     | Yokohama Metal Co., Ltd.                             | CID002129 | JP |
| Gold     | Zhongyuan Gold Smelter of Zhongjin Gold Corporation  | CID002224 | CN |
| Tantalum | AMG Brasil   | CID001076 | BR |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd.            | CID000211 | CN |
| Tantalum | D Block Metals, LLC                                  | CID002504 | US |
| Tantalum | F&X Electro-Materials Ltd.                           | CID000460 | CN |
| Tantalum | FIR Metals & Resource Ltd.                           | CID002505 | CN |
| Tantalum | Global Advanced Metals Aizu                          | CID002558 | JP |
| Tantalum | Global Advanced Metals Boyertown                     | CID002557 | US |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd.    | CID002492 | CN |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd.         | CID002512 | CN |
| Tantalum | Jiangxi Tuohong New Raw Material                     | CID002842 | CN |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd.          | CID000914 | CN |
| Tantalum | Jiujiang Tanbre Co., Ltd.                            | CID000917 | CN |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd.        | CID002506 | CN |
| Tantalum | KEMET de Mexico                                      | CID002539 | MX |
| Tantalum | Materion Newton Inc.                                 | CID002548 | US |
| Tantalum | Metallurgical Products India Pvt., Ltd.              | CID001163 | IN |
| Tantalum | Mineracao Taboca S.A.                                | CID001175 | BR |
| Tantalum | Mitsui Mining and Smelting Co., Ltd.                 | CID001192 | JP |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd.           | CID001277 | CN |
| Tantalum | NPM Silmet AS  | CID001200 | EE |
| Tantalum | QuantumClean   | CID001508 | US |
| Tantalum | Resind Industria e Comercio Ltda.                    | CID002707 | BR |
| Tantalum | RFH Yancheng Jinye New Material Technology Co., Ltd. | CID003583 | CN |
| Tantalum | Taki Chemical Co., Ltd.                              | CID001869 | JP |
| Tantalum | TANIOBIS Co., Ltd.                                   | CID002544 | TH |
| Tantalum | TANIOBIS GmbH  | CID002545 | DE |
| Tantalum | TANIOBIS Japan Co., Ltd.                             | CID002549 | JP |
| Tantalum | TANIOBIS Smelting GmbH & Co. KG                      | CID002550 | DE |
| Tantalum | Telex Metals   | CID001891 | US |
| Tantalum | Ulba Metallurgical Plant JSC                         | CID001969 | KZ |
| Tantalum | XIMEI RESOURCES (GUANGDONG) LIMITED                  | CID000616 | CN |
| Tantalum | Yanling Jincheng Tantalum & Niobium Co., Ltd.        | CID001522 | CN |

|     |   |           |    |
|-----|---|-----------|----|
| Tin | Alpha   | CID000292 | US |
| Tin | Aurubis Beerse                                    | CID002773 | BE |
| Tin | Aurubis Berango                                   | CID002774 | ES |
| Tin | Brand RBT   | CID001460 | ID |
| Tin | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | CID000228 | CN |
| Tin | Chifeng Dajingzi Tin Industry Co., Ltd.           | CID003190 | CN |
| Tin | China Tin Group Co., Ltd.                         | CID001070 | CN |
| Tin | CRM Synergies                                     | CID003524 | ES |
| Tin | CV Ayi Jaya                                       | CID002570 | ID |
| Tin | CV Venus Inti Perkasa                             | CID002455 | ID |
| Tin | Dowa  | CID000402 | JP |
| Tin | EM Vinto  | CID000438 | BO |
| Tin | Estanho de Rondonia S.A.                          | CID000448 | BR |
| Tin | Fabrica Auricchio Industria e Comercio Ltda.      | CID003582 | BR |
| Tin | Fenix Metals                                      | CID000468 | PL |
| Tin | Gejiu Non-Ferrous Metal Processing Co., Ltd.      | CID000538 | CN |
| Tin | Guangdong Hanhe Non-Ferrous Metal Co., Ltd.       | CID003116 | CN |
| Tin | Jiangxi New Nanshan Technology Ltd.               | CID001231 | CN |
| Tin | Luna Smelter, Ltd.                                | CID003387 | RW |
| Tin | Magnu's Minerais Metais e Ligas Ltda.             | CID002468 | BR |
| Tin | Malaysia Smelting Corporation (MSC)               | CID001105 | MY |
| Tin | Metallic Resources, Inc.                          | CID001142 | US |
| Tin | Mineracao Taboca S.A.                             | CID001173 | BR |
| Tin | Minsur  | CID001182 | PE |
| Tin | Mitsubishi Materials Corporation                  | CID001191 | JP |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd.           | CID001314 | TH |
| Tin | O.M. Manufacturing Philippines, Inc.              | CID002517 | PH |
| Tin | Operaciones Metalurgicas S.A.                     | CID001337 | BO |
| Tin | Precious Minerals and Smelting Limited            | CID003409 | IN |
| Tin | PT Aries Kencana Sejahtera                        | CID000309 | ID |
| Tin | PT Artha Cipta Langgeng                           | CID001399 | ID |
| Tin | PT ATD Makmur Mandiri Jaya                        | CID002503 | ID |
| Tin | PT Babel Inti Perkasa                             | CID001402 | ID |
| Tin | PT Babel Surya Alam Lestari                       | CID001406 | ID |
| Tin | PT Bangka Prima Tin                               | CID002776 | ID |
| Tin | PT Bangka Serumpun                                | CID003205 | ID |
| Tin | PT Bangka Tin Industry                            | CID001419 | ID |
| Tin | PT Bukit Timah                                    | CID001428 | ID |
| Tin | PT Cipta Persada Mulia                            | CID002696 | ID |
| Tin | PT Menara Cipta Mulia                             | CID002835 | ID |



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|----------|--|-----------|----|
| Tin      | PT Mitra Stania Prima  | CID001453 | ID |
| Tin      | PT Mitra Sukses Globalindo   | CID003449 | ID |
| Tin      | PT Prima Timah Utama   | CID001458 | ID |
| Tin      | PT Putera Sarana Shakti (PT PSS)   | CID003868 | ID |
| Tin      | PT Rajawali Rimba Perkasa  | CID003381 | ID |
| Tin      | PT Sariwiguna Binasentosa  | CID001463 | ID |
| Tin      | PT Stanindo Inti Perkasa   | CID001468 | ID |
| Tin      | PT Sukses Inti Makmur  | CID002816 | ID |
| Tin      | PT Timah Tbk Kundur  | CID001477 | ID |
| Tin      | PT Timah Tbk Mentok  | CID001482 | ID |
| Tin      | PT Tommy Utama   | CID001493 | ID |
| Tin      | Resind Industria e Comercio Ltda.  | CID002706 | BR |
| Tin      | Rui Da Hung  | CID001539 | TW |
| Tin      | Thaisarco  | CID001898 | TH |
| Tin      | Tin Technology & Refining  | CID003325 | US |
| Tin      | White Solder Metalurgia e Mineracao Ltda.                                      | CID002036 | BR |
| Tin      | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.                                  | CID002158 | CN |
| Tin      | Yunnan Tin Company Limited   | CID002180 | CN |
| Tungsten | A.L.M.T. Corp.   | CID000004 | JP |
| Tungsten | Asia Tungsten Products Vietnam Ltd.  | CID002502 | VN |
| Tungsten | China Molybdenum Tungsten Co., Ltd.  | CID002641 | CN |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd.   | CID000258 | CN |
| Tungsten | Cronimet Brasil Ltda   | CID003468 | BR |
| Tungsten | Fujian Xinlu Tungsten Co., Ltd.  | CID003609 | CN |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd.                                    | CID000875 | CN |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd.  | CID002315 | CN |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd.   | CID002494 | CN |
| Tungsten | Global Tungsten & Powders Corp.  | CID000568 | US |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd.   | CID000218 | CN |
| Tungsten | H.C. Starck Tungsten GmbH  | CID002541 | DE |
| Tungsten | Hubei Green Tungsten Co., Ltd.   | CID003417 | CN |
| Tungsten | Hunan Chenzhou Mining Co., Ltd.  | CID000766 | CN |
| Tungsten | Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch | CID002513 | CN |
| Tungsten | Japan New Metals Co., Ltd.   | CID000825 | JP |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd.                                | CID002551 | CN |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd.   | CID002321 | CN |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.                  | CID002318 | CN |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd.                                   | CID002317 | CN |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd.  | CID002316 | CN |
| Tungsten | Kennametal Fallon  | CID000966 | US |

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|----------|---|-----------|----|
| Tungsten | Kennametal Huntsville                     | CID000105 | US |
| Tungsten | Lianyou Metals Co., Ltd.                  | CID003407 | TW |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd.           | CID002319 | CN |
| Tungsten | Masan High-Tech Materials                 | CID002543 | VN |
| Tungsten | Niagara Refining LLC                      | CID002589 | US |
| Tungsten | Philippine Chuangxin Industrial Co., Inc. | CID002827 | PH |
| Tungsten | TANIOBIS Smelting GmbH & Co. KG           | CID002542 | DE |
| Tungsten | Wolfram Bergbau und Hutten AG             | CID002044 | AT |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd.          | CID002320 | CN |
| Tungsten | Xiamen Tungsten Co., Ltd.                 | CID002082 | CN |

Annex 2 Country of Origin Information Based on RMI RCOI Data January 26, 2024

| Country of Origin                   |  |                      |
|-------------------------------------|--|----------------------|
| Argentina G                         | Georgia G,                             | Nicaragua G          |
| Australia G, Ta, Sn , W             | Ghana G                                | Niger G              |
| Austria W                           | Guatemala G                            | Nigeria G, Sn, W     |
| Azerbaijan G                        | Guinea G,                              | Oman G               |
| Benin G                             | Guyana G                               | Panama G             |
| Bolivia G, W                        | Honduras G                             | Papua New Guinea G   |
| Botswana G                          | Indonesia G, Sn                        | Peru G, Sn, W        |
| Brazil G, W                         | Japan G                                | Philippines G        |
| Burkina Faso G                      | Kazakhstan G, Ta, W                    | Portugal Sn, W       |
| Burundi W                           | Kenya G                                | Russia Sn, W         |
| Cambodia G,                         | Korea, Republic of G                   | Rwanda Ta, Sn, W     |
| Canada G                            | Kyrgyzstan G, W                        | Saudi Arabia G       |
| Chile G, W                          | Lao People's Democratic Republic G, Sn | Senegal G            |
| China G, Ta, Sn, W                  | Liberia G                              | Serbia Ta            |
| Colombia G                          | Madagascar Ta                          | Sierra Leone Ta      |
| Congo, Democratic Republic of the G | Malaysia Sn, W                         | South Africa G       |
| Côte d'Ivoire G, Ta, Sn, W          | Mali G                                 | Spain G, W           |
| Dominican Republic G                | Mauritania G                           | Sudan G,             |
| Ecuador G                           | Mexico G                               | Suriname G           |
| Egypt G                             | Mongolia G                             | Sweden G             |
| Ethiopia Ta                         | Morocco G                              | Tanzania G, Sn, W    |
| Fiji G,                             | Mozambique G, Ta                       | Thailand G           |
| Finland G                           | Myanmar G                              | Turkey G             |
| France Ta                           | Namibia G                              | Uganda W             |
| French Guiana G                     | New Zealand G                          | United Kingdom Sn, W |

Key: 3TG = Tantalum, Tin, Tungsten and Gold; 3T= Tantalum, Tin and Tungsten G = Gold; Ta= Tantalum; Sn= Tin; W=Tungsten  
 \* Covered Country