Conflict Minerals Report 2020

Vodafone Group Plc

vodafone

Vodafone Conflict Minerals Report 2020

This Conflict Minerals Report for the year ended 31 December 2020 is presented by Vodafone Group Plc ('Vodafone') in accordance with Rule 13p-1 (the 'Rule') under the US Securities Exchange Act of 1934 (the 'Exchange Act').

The Rule applies to companies required to file reports with the US Securities and Exchange Commission ('SEC') under Section 13(a) or 15(d) of the Exchange Act if any of the products they manufacture or contract to manufacture contain conflict minerals necessary to the functionality or production of the product ('in-scope products').

As defined by the content requirements of SEC Form SD, 'Conflict Minerals' include columbite-tantalite ('coltan'), cassiterite, wolframite and/or gold or their derivatives, which are limited to tantalum, tin and tungsten (each a '3TG metal'). Please refer to the requirements of SEC Form SD for definitions of many of the terms used in this report, including 'Covered Countries' (Democratic Republic of Congo ('DRC') or an adjoining country).

Company overview

Vodafone is a leading telecommunications company in Europe and Africa. Our purpose is to "connect for a better future" enabling an inclusive and sustainable digital society. Our expertise and scale gives us a unique opportunity to drive positive change for society. Our networks keep family, friends, businesses and governments connected and – as COVID-19 has clearly demonstrated – we play a vital role in keeping economies running and the functioning of critical sectors like education and healthcare.

Vodafone is the largest mobile and fixed network operator in Europe and a leading global IoT connectivity provider. Our M-Pesa technology platform in Africa enables over 48m people to benefit from access to mobile payments and financial services. We operate mobile and fixed networks in 21 countries and partner with mobile networks in 49 more. As of 31 March 2021, we had over 300m mobile customers, more than 28m fixed broadband customers, over 22m TV customers and we connected more than 123m IoT devices.

For more information, please visit www.vodafone.com, follow us on Twitter at @VodafoneGroup or connect with us on LinkedIn at www.linkedin.com/company/vodafone.

Vodafone's American Depositary Shares are listed on the NASDAQ Global Select Market LLC ('NASDAQ'). We are therefore subject to the NASDAQ listing rules and file reports with the SEC under Section 13(a) of the Exchange Act.

We use electronic equipment in our operations and we sell a range of products to our customers, including mobile phones, tablets, SIM cards, fixed broadband routers, TV set-top boxes and Internet of Things devices. Vodafone Automotive also sells electronic products, such as anti-theft, parking assistance and telematics systems, to vehicle manufacturers.

Most of the products that we resell to customers, such as smartphones, routers, and tablets, are produced by major companies with internationally recognised brands that report sustainability actions in their own right.

We also offer our customers a range of devices that carry the Vodafone logo, which is when we contract with suppliers to manufacture these for us. These devices are designed and built on our behalf by suppliers known as original design manufacturers ('ODMs'). We contract ODMs to design and manufacture these products according to our specifications and therefore have some degree of influence over the manufacturing of the product, such as specifying certain criteria for the materials, parts or components to be used. However, we do not own, operate or control the manufacturing plants where they are made. Vodafone Automotive also operates a small technology device manufacturing plant in Italy.

The agreements in place with our suppliers give Vodafone the right to perform supplier quality audits and ensure that we only select vendors which work with integrity, safety and quality. Our Annual Report and Modern Slavery Statement provide more information about our supply chain and how we manage relevant sustainability risks. These are available on our website.

Applicability

Our products contain numerous components that may contain one or more of the 3TG metals. For example, tin is often used as a soldering material for electronic components, and gold and tantalum are typically used in components such as connectors or capacitors.

We conduct an annual analysis of our suppliers' procurement and manufacturing activities to determine which products the Rule applies to ('In-Scope Products') by:

- identifying the products that are likely to include 3TG metals. We do this by reviewing product categories through our supplier qualification process and, for Vodafone Automotive products, checking whether components are listed as including 3TG metals on the automotive industry's International Material Data System.
- determining which of these products are likely to be ones that we contract to manufacture or, in the case of Vodafone Automotive products, manufacture.

For the year ended 31 December 2020, we identified seven types of products that were likely to include In-Scope Products:

- selected handsets purchased from ODMs
- connected home devices (i.e. routers, modems, set-top boxes and femtocells)
- datacards (i.e. mobile broadband dongles)
- Internet of Things tracker devices
- vehicle anti-theft systems, such as alarm sirens and intrusion sensors
- parking assistance products, such as sensors and electronic units that assist drivers in parking their vehicles
- telematic control units for vehicles, such as tracking systems based on Global System for Mobile Communications ('GSM') and Global Positioning System ('GPS') technologies.

Based on this applicability assessment, we identified 837 In-Scope Products during the year ended 31 December 2020.

The In-Scope Products only account for a relatively small proportion (less than 10%) of our total expenditure with suppliers that supply the above-mentioned products. We sourced these In-Scope Products, or their components, from 64 suppliers ('In-Scope Suppliers') in the year ended 31 December 2020.

Reasonable Country of Origin Inquiry

In accordance with the Rule, we carried out a Reasonable Country of Origin Inquiry ('RCOI') and due diligence process to determine the origin of the 3TG metals used in our In-Scope Products.

The smelters and refiners ('Smelters') that produce 3TG metals, and the mines from which the minerals are originally sourced, are many steps away from Vodafone in the supply chain. We therefore rely on our suppliers to provide information to support our due diligence efforts.

We include Conflict Minerals reporting requirements as part of our suppliers' contractual obligations. These require In-Scope Suppliers to conduct due diligence to identify the origin of the 3TG metals in the components or products they sell to us and ensure that the 3TG metals are sourced responsibly. Our direct suppliers are expected to extend similar requirements to their own suppliers and cascade them down the supply chain until the origin of the 3TG metals contained in the products supplied to us (either directly or indirectly) can be identified.

We conduct our RCOI based on the Smelter information received from our In-Scope Suppliers. We then compare this with the RCOI database compiled by the Responsible Minerals Initiative ('RMI'), an industry initiative in which we participate to support the collection of information, increase transparency and establish a chain of custody over the mineral supply chain. The RCOI database contains aggregated data on the origins of 3TG metals from Smelters that conform with the RMI's Responsible Minerals Assurance Process ('RMAP').

In some cases, information provided by our direct suppliers is incomplete and suppliers are unable to confirm the 'Country of Origin' information for 3TG metals.

RCOI conclusion

Based on data collected from our suppliers for the year ended 31 December 2020, we believe that some 3TG metals contained in our In-Scope Products originate from Covered Countries and we have conducted due diligence as described below.

See Annex for a list of the confirmed Smelters included in the Conflict Minerals reports submitted by our In-Scope Suppliers and the compiled Countries of Origin Information.

Vodafone's commitment to sustainable business in the DRC

Vodacom Congo (RDC) S.A. ('Vodacom DRC'), a subsidiary of Vodacom Group Limited (which is a member of the Vodafone Group), is the largest provider of telecommunications services in the DRC, with revenues of US$509 million in the financial year ended 31 March 2021.

We have been operating in the country, through our Vodacom subsidiary, since 2002. The supply of our products follows the same centralised procurement process in the DRC as it does in the other countries where we operate.

We are constantly looking for opportunities to improve lives through connectivity and technology solutions and to work with other stakeholders to contribute to the positive socio-economic development in all the countries we operate in.

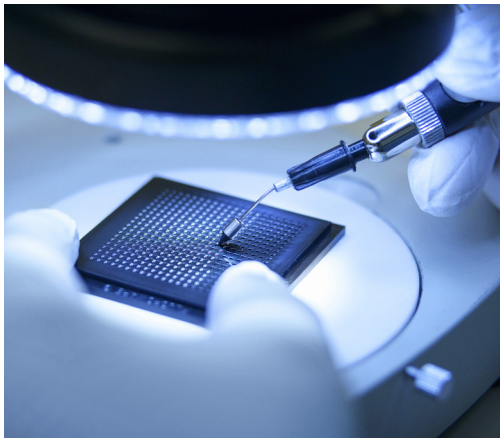
For more on our commitment to sustainable business in the DRC, see Vodacom's Sustainability Report.

Responsible mineral sourcing

3TG metals come from many different Smelters in a complex and often opaque supply chain. Minerals are extracted from mines, Smelters procure minerals and process them into useable metals, and these metals are then used to make components to go into electronic products.

We conduct due diligence to support our commitment to source minerals responsibly and to comply with relevant disclosure regulations. Our aim is to ensure that none of the products or components we buy contain 3TG metals that have helped to fund conflict (as set out in our Responsible Minerals Statement).

Our process is designed to comply with the Rule and interpretive guidance and conform with the internationally recognised framework set out in the Organisation for Economic Co-operation and Development ('OECD') Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition) ('OECD Due Diligence Guidance').



Due diligence

Our due diligence process follows the five-step framework set out in the OECD Due Diligence Guidance.

Step 1: Establish strong company management systems

We have a policy related to the sourcing of Conflict Minerals which is communicated publicly via our Vodafone Responsible Minerals Statement and summarised in our Group Human Rights Statement. Overall accountability for implementation of the policy lies with our Group Chief Commercial Officer, who sits on our Group Executive Committee. The policy is overseen by our Group Product and Services Director, who leads the function responsible for sourcing mobile phones, tablets, set-top boxes and other such devices. Representatives from corporate functions provide legal expertise and subject matter expertise, and our procurement teams manage relationships with In-Scope Suppliers, all of whom support the implementation of due diligence activities.

We work together with specialist consultancy service providers to assist in tracking data, assessing risks and preparing our reporting. Additionally, we have engaged with a third-party auditor to internally assess the processes and procedures of our Responsible Minerals Programme. The audit results are used to validate the implementation of our process and identify potential opportunities for improvements in future.

We have established a process to identify In-Scope Suppliers (as outlined in the Applicability section above) and we include Conflict Minerals clauses in their contracts. These clauses require In-Scope Suppliers to conduct due diligence to identify the Smelter of 3TG metals in the components or products they sell to us in an effort to demonstrate that the minerals or elements are not from a source which directly or indirectly finances or benefits armed groups.

Our direct In-Scope Suppliers are expected to extend a similar identification process as described above to their own suppliers and cascade them down the supply chain until the smelter of the 3TG metals contained in the In-Scope Products can be identified.

The identified In-Scope Suppliers must report on their progress through the RMI Conflict Minerals Reporting Template ('CMRT'), which they are required to complete on an annual basis. The CMRT is designed to identify the Smelters from which any 3TG metals in each In-Scope Product are sourced.

We engage with In-Scope Suppliers to raise awareness of our processes and requirements and help them understand how to meet the requirements of the contract clause on Conflict Minerals. We also share best-practice advice on how to complete the CMRT and apply lessons learned from the previous year's disclosure process. In addition, we provide a dedicated point of contact at Vodafone to respond to suppliers' questions on Conflict Minerals Reporting.

Our established *Speak Up* process, outlined in our Code of Conduct, provides a company-wide grievance mechanism for reporting any concerns related to allegations of illegal or unethical practices or breaches of Vodafone's Code of Conduct and policies, including those related to Conflict Minerals. It can be used by employees, contractors, suppliers' employees or contractors, business partners or any other individual or organisation to report concerns, anonymously if they prefer. Information on supplier ethics and *Speak Up* is available on our website.

Step 2: Identify and assess risks in the supply chain

To identify and assess Conflict Minerals risks in our supply chain, we requested that all 64 suppliers of In-Scope Products (identified through the applicability assessment outlined above) complete the CMRT.

We compared the Smelters identified in the supplier responses with the RMI List of All Operational 3TG Smelters, the RMI Smelter Revision History List, The RMI List of Conformant Smelters and the RMI List of Active Smelters. These lists are maintained online by the RMI and are frequently updated to reflect changes in the reported status of Smelters.

See Annex for a list of RMI confirmed operational Smelters, which were included in the reports submitted by our suppliers, together with their status of RMAP Conformant, Active or Non-conformant.

RMAP Conformant Smelters have successfully completed a RMAP audit and maintain good standing in the programme through a continual validation process. They have the systems and processes in place to support responsible sourcing of raw materials and can provide evidence to support their sourcing activities.

RMAP Active Smelters have signed an Agreement for the Exchange of Confidential Information and Auditee Agreement contracts. If they are deemed by the RMI not to be progressing toward a RMAP audit, gap closure or re-audit for a period of more than 90 days, they

will be removed from the Active list.

Based on our analysis of the 64 In-Scope Suppliers, we identified some risks, such as incomplete reporting of sub-suppliers, inconsistencies in the Declaration section of the CMRT, incomplete reporting at company level, and identification of non-conformant Smelters in the supply chain. We followed up with relevant suppliers to further assess and address these risks.

To help understand the challenges and issues with a Smelter located in a Covered Country we met with the LuNa smelter management team. This is the first RMAP conformant smelter in a Covered Country, Rwanda, that is identified in our supply chain. The team provided valuable insight into challenges they face. These challenges include: conforming to numerous international and regional regulatory schemes such as the US and EU Conflict Minerals and the International Conference of the Great Lakes Region (ICGLR) Regional Certification Mechanism; numerous third party audit requirements to assure market access for their refined tin; additional due diligence costs compared with other international smelters not located in a Covered Country; negative cost impacts and restricted operational flexibility due to the overlap and conflicting requirements of due diligence schemes between upstream assurance mechanisms and the RMAP; and an increased number of transactions as a direct purchaser of minerals from artisanal and small scale sources as opposed to international traders.

Step 3: Design and implement a strategy to respond to identified risks

Our strategy to respond to identified risks includes a range of measures that form part of our due diligence process. We have a communication and escalation process in place to notify and engage, if required, our Group Chief Commercial Officer where any potentially significant risks are identified.

We use legal and contractual mechanisms to obligate our suppliers to comply with relevant regulations.

We review supplier responses to the CMRT and follow up with suppliers to request clarification or more complete responses where necessary. Where any risks are identified, we engage with suppliers and request their commitment to corrective actions to manage these risks, including a commitment to improve data quality.

If In-Scope Suppliers identify Smelters within our supply chain that are RMAP Non-conformant, we ask them to encourage these Smelters to participate in the RMAP process or consider alternate sourcing arrangements.

In the year ended 31 December 2020, we conducted a mid-year assessment with certain suppliers to determine whether they were making progress in preparing to provide a more complete CMRT with no or fewer RMAP Non-conformant Smelters.

We also participate in wider industry efforts to support responsible sourcing and audit Smelters' due diligence activities through our membership (member code: VODA) of the RMI (see box).

Step 4: Carry out independent third-party audits of Smelter due diligence practices

We do not directly purchase raw minerals, ores or 3TG metals. We are many steps removed from the mines and Smelters that supply the minerals, ores and 3TG metals contained in our products. Therefore, our due diligence efforts rely on cross-industry initiatives, such as the RMI, London Bullion Market Association (LBMA) and the Responsible Jewellery Council (RJC), to conduct audits of Smelters' due diligence practices.

Step 5: Report annually on supply chain due diligence

In accordance with the Rule and the OECD Due Diligence Guidance, this report is publicly available on our website.

Participating in the RMI

We participate in industry efforts to support responsible sourcing of minerals as a member of the RMI. The RMI works to validate Smelters as conflict-free and assists companies in making informed decisions about Conflict Minerals in their supply chain. We are also a member of a RMI working groups, such as the Due Diligence Practices Team.

The data that informs certain statements in this declaration, such as the RCOI report, was obtained through our membership in the RMI.

Determination

As we do not directly purchase raw minerals, ores or 3TG metals, we rely on our direct (Tier 1) suppliers to gather information about Smelters in our supply chain.

We received CMRT responses for the year ended 31 December 2020 from all 64 In-Scope Suppliers (100%). All RMI reference data and supplier information was based on data received as of 25 March, 2021.

Based on supplier responses for the year ended 31 December 2020, we have identified 316 Smelters that are on the RMAP list of known Smelters. Of these, 80% were either RMAP Conformant or Active: 237 are certified as RMAP Conformant and 17 are Active. The remaining 62 Smelters were identified as RMAP Non-conformant.

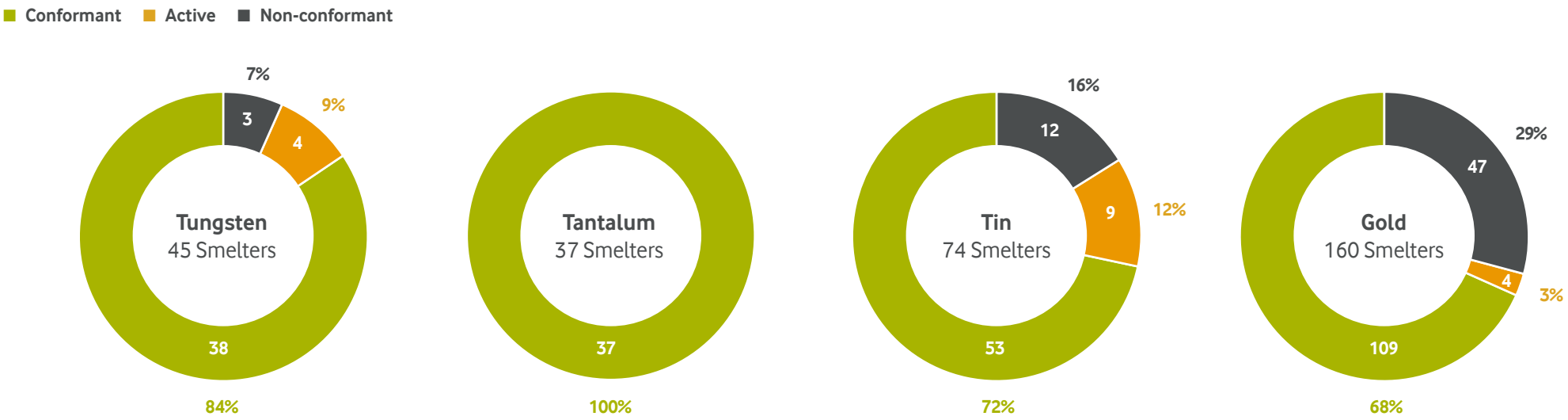
Based on the RMI RCOI information provided for RMAP Conformant smelters, 71 Smelters may source from Covered Countries. See Annex for the list of identified Smelters and their RMAP status.

We will engage with the In-Scope Suppliers that have identified Non-conformant Smelters as being within their supply chain to either encourage the Smelters to become RMAP Conformant or remove them from the supply chain.

The data provided by In-Scope Suppliers continues to improve with additional Smelter details being included in our suppliers' CMRT responses. However, there are still gaps in the information provided where suppliers in the supply chain have failed to provide details for all components. Responses from suppliers showed that there are still significant challenges relating to information about the Country of Origin of 3TG metals, and the Smelters from which 3TG metals were sourced. Information received from In-Scope Suppliers regarding their supply chain can be incomplete or potentially erroneous. We will continue engaging with suppliers to improve the completeness and quality of information provided.

Based on the RCOI enquiry and due diligence efforts described above, we have determined that some Conflict Minerals contained in our In-Scope Products originated in Covered Countries. As a result of the incompleteness of some suppliers' responses received so far through our ongoing due diligence programme, we are unable to determine the origin of all Conflict Minerals contained in all our In-Scope Products. We have made a reasonable good-faith effort to collect and evaluate the information concerning Smelters based on the information provided by our suppliers.

RMAP Conformant Smelters by Mineral Identified in Vodafone's Supply Chain



Continuous improvement efforts to mitigate risk

We are taking a range of steps to enhance the due diligence process and further mitigate any risk that Conflict Minerals used in the company's products may benefit armed groups.

We are engaging with suppliers to:

- encourage them to put a Conflict Minerals policy in place or improve their existing responsible minerals programme;
- improve the completeness and quality of information provided, particularly in relation to the identification of Smelters and the Country of Origin of 3TG metals, and in providing CMRT information on Smelters at product level; and
- seek their commitment to implement further improvements in relation to due diligence processes, including asking them to reach out to RMAP Non-conformant Smelters identified as being within our supply chain to encourage these Smelters to undergo a RMAP audit.

Through the RMI, we are participating in industry efforts to address issues related to Conflict Minerals in supply chains, increase the number of Smelters sourcing from the Covered Countries that are conflict-free and improve Country of Origin information.

Our aim is to ensure minerals used in our supply chain do not fund conflict, while continuing to support local economies by allowing the use of materials from Conflict-Affected and High-Risk Areas including the Covered Countries that have been processed by Smelters verified by third-party assurance programmes such as RMI, LBMA and RJC.

Annex: list of known smelters

The table lists the Smelters identified through supplier CMRT responses for the year ended 31 December 2020 and their RMAP status as of 25 March 2021.

Conformant

Gold: conformant

Smelter ID	Standard smelter name	Country location
CID000015	Advanced Chemical Company	USA
CID000019	Aida Chemical Industries Co., Ltd.	Japan
CID000035	Allgemeine Gold-und Silberscheideanstalt A.G.	Germany
CID000041	Almalyk Mining and Metallurgical Complex (AMMC)	Uzbekistan
CID000058	AngloGold Ashanti Corrego do Sitio Mineracao	Brazil
CID000077	Argor-Heraeus S.A.	Switzerland
CID000082	Asahi Pretec Corp.	Japan
CID000090	Asaka Riken Co., Ltd.	Japan
CID000113	Aurubis AG	Germany
CID000128	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	Philippines
CID000157	Boliden AB	Sweden
CID000176	C. Hafner GmbH + Co. KG	Germany
CID000185	CCR Refinery - Glencore Canada Corporation	Canada
CID000189	Cendres + Metaux S.A.	Switzerland
CID000233	Chimet S.p.A.	Italy
CID000264	Chugai Mining	Japan
CID000343	Daye Non-Ferrous Metals Mining Ltd.	China
CID000359	DSC (Do Sung Corporation)	Korea, Republic of
CID000362	DODUCO Contacts and Refining GmbH	Germany
CID000401	Dowa	Japan
CID000425	Eco-System Recycling Co., Ltd. East Plant	Japan
CID000493	JSC Novosibirsk Refinery	Russian Federation
CID000689	LT Metal Ltd.	Korea, Republic of
CID000694	Heimerle + Meule GmbH	Germany
CID000707	Heraeus Metals Hong Kong Ltd.	China
CID000801	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	China
CID000807	Ishifuku Metal Industry Co., Ltd.	Japan
CID000814	Istanbul Gold Refinery	Turkey
CID000823	Japan Mint	Japan
CID000855	Jiangxi Copper Co., Ltd.	China
CID000920	Asahi Refining USA Inc.	USA
CID000924	Asahi Refining Canada Ltd.	Canada
CID000929	JSC Uralelectromed	Russian Federation
CID000937	JX Nippon Mining & Metals Co., Ltd.	Japan
CID000957	Kazzinc	Kazakhstan
CID000969	Kennecott Utah Copper LLC	USA
CID000981	Kojima Chemicals Co., Ltd.	Japan
CID001029	Kyrgyzaltyn JSC	Kyrgyzstan
CID001078	LS-NIKKO Copper Inc.	Korea, Republic of
CID001113	Materion	USA
CID001119	Matsuda Sangyo Co., Ltd.	Japan
CID001147	Metalor Technologies (Suzhou) Ltd.	China
CID001149	Metalor Technologies (Hong Kong) Ltd.	China
CID001152	Metalor Technologies (Singapore) Pte., Ltd.	Singapore
CID001153	Metalor Technologies S.A.	Switzerland
CID001157	Metalor USA Refining Corporation	USA
CID001161	Metalurgica Met-Mex Penoles S.A. De C.V.	Mexico
CID001188	Mitsubishi Materials Corporation	Japan
CID001193	Mitsui Mining and Smelting Co., Ltd.	Japan
CID001204	Moscow Special Alloys Processing Plant	Russian Federation
CID001220	Nadir Metal Rafineri San. Ve Tic. A.S.	Turkey
CID001236	Navoi Mining and Metallurgical Combinat	Uzbekistan
CID001259	Nihon Material Co., Ltd.	Japan
CID001325	Ohura Precious Metal Industry Co., Ltd.	Japan
CID001326	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	Russian Federation
CID001352	PAMP S.A.	Switzerland
CID001386	Prioksky Plant of Non-Ferrous Metals	Russian Federation
CID001397	PT Aneka Tambang (Persero) Tbk	Indonesia
CID001498	PX Precinox S.A.	Switzerland
CID001512	Rand Refinery (Pty) Ltd.	South Africa
CID001534	Royal Canadian Mint	Canada
CID001555	Samduck Precious Metals	Korea, Republic of
CID001585	SEMPSA Joyeria Plateria S.A.	Spain
CID001622	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	China
CID001736	Sichuan Tianze Precious Metals Co., Ltd.	China
CID001756	SOE Shyolkovsky Factory of Secondary Precious Metals	Russian Federation
CID001761	Solar Applied Materials Technology Corp.	Taiwan, Province of China
CID001798	Sumitomo Metal Mining Co., Ltd.	Japan
CID001875	Tanaka Kikinzoku Kogyo K.K.	Japan
CID001909	Great Wall Precious Metals Co., Ltd. of CBPM	China
CID001916	Shandong Gold Smelting Co., Ltd.	China
CID001938	Tokuriki Honten Co., Ltd.	Japan
CID001955	Torecom	Korea, Republic of
CID001980	Umicore S.A. Business Unit Precious Metals Refining	Belgium
CID001993	United Precious Metal Refining, Inc.	USA
CID002003	Valcambi S.A.	Switzerland
CID002030	Western Australian Mint (T/a The Perth Mint)	Australia
CID002100	Yamakin Co., Ltd.	Japan
CID002129	Yokohama Metal Co., Ltd.	Japan
CID002224	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	China
CID002243	Gold Refinery of Zijin Mining Group Co., Ltd.	China
CID002290	SAFINA A.S.	Czechia

Annex: list of known smelters

Conformant: Gold (continued)

Smelter ID	Standard smelter name	Country location
CID002314	Umicore Precious Metals Thailand	Thailand
CID002459	Geib Refining Corporation	USA
CID002509	MMTC-PAMP India Pvt., Ltd.	India
CID002511	KGHM Polska Miedz Spolka Akcyjna	Poland
CID002516	Singway Technology Co., Ltd.	Taiwan, Province of China
CID002560	Al Etihad Gold Refinery DMCC	United Arab Emirates
CID002561	Emirates Gold DMCC	United Arab Emirates
CID002580	T.C.A S.p.A	Italy
CID002582	REMONDIS PMR B.V.	Netherlands
CID002605	Korea Zinc Co., Ltd.	Korea, Republic of
CID002606	Marsam Metals	Brazil
CID002615	TOO Tau-Ken-Altyn	Kazakhstan
CID002761	SAAMP	France
CID002762	L'Orfebre S.A.	Andorra
CID002763	8853 S.p.A.	Italy
CID002765	Italpreziosi	Italy
CID002777	SAXONIA Edelmetalle GmbH	Germany
CID002778	WIELAND Edelmetalle GmbH	Germany
CID002779	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	Austria
CID002850	AU Traders and Refiners	South Africa
CID002863	Bangalore Refinery	India
CID002918	SungEel HiMetal Co., Ltd.	Korea, Republic of
CID002919	Planta Recuperadora de Metales SpA	Chile
CID002973	Safimet S.p.A	Italy
CID003195	TSK Pretech	Korea, Republic of
CID003424	Eco-System Recycling Co., Ltd. North Plant	Japan
CID003425	Eco-System Recycling Co., Ltd. West Plant	Japan

Conformant: Tantalum

Smelter ID	Standard smelter name	Country location
CID000092	Asaka Riken Co., Ltd.	Japan
CID000211	Changsha South Tantalum Niobium Co., Ltd.	China
CID000456	Exotech Inc.	USA
CID000460	F&X Electro-Materials Ltd.	China
CID000616	Ximei Resources (Guangdong) Limited	China
CID000914	JiuJiang JinXin Nonferrous Metals Co., Ltd.	China
CID000917	Jiujiang Tanbre Co., Ltd.	China
CID001076	AMG Brasil - LSM Brasil	Brazil
CID001163	Metallurgical Products India Pvt., Ltd.	India
CID001175	Mineracao Taboca S.A.	Brazil
CID001192	Mitsui Mining and Smelting Co., Ltd.	Japan
CID001200	NPM Silmet AS	Estonia
CID001277	Ningxia Orient Tantalum Industry Co., Ltd.	China
CID001508	QuantumClean	USA
CID001522	Yanling Jincheng Tantalum & Niobium Co., Ltd.	China
CID001769	Solikamsk Magnesium Works OAO	Russian Federation
CID001869	Taki Chemical Co., Ltd.	Japan
CID001891	Telex Metals	USA
CID001969	Ulba Metallurgical Plant JSC	Kazakhstan
CID002492	Hengyang King Xing Lifeng New Materials Co., Ltd.	China
CID002504	D Block Metals, LLC	USA
CID002505	FIR Metals & Resource Ltd.	China
CID002506	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	China
CID002508	XinXing HaoRong Electronic Material Co., Ltd.	China
CID002512	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	China
CID002539	KEMET de Mexico	Mexico
CID002544	TANIOBIS Co., Ltd.	Thailand
CID002545	TANIOBIS GmbH	Germany
CID002547	H.C. Starck Hermsdorf GmbH	Germany
CID002548	H.C. Starck Inc.	USA
CID002549	TANIOBIS Japan Co., Ltd.	Japan
CID002550	TANIOBIS Smelting GmbH & Co. KG	Germany
CID002557	Global Advanced Metals Boyertown	USA
CID002558	Global Advanced Metals Aizu	Japan
CID002707	Resind Industria e Comercio Ltda.	Brazil
CID002842	Jiangxi Tuohong New Raw Material	China
CID002847	Meta Materials	North Macedonia, Republic of

Conformant: Tin

Smelter ID	Standard smelter name	Country location
CID000228	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	China
CID000292	Alpha	USA
CID000402	Dowa	Japan
CID000438	EM Vinto	Bolivia (Plurinational State of)
CID000468	Fenix Metals	Poland
CID000538	Gejiu Non-Ferrous Metal Processing Co., Ltd.	China
CID000555	Gejiu Zili Mining And Metallurgy Co., Ltd.	China
CID000942	Gejiu Kai Meng Industry and Trade LLC	China
CID001070	China Tin Group Co., Ltd.	China
CID001105	Malaysia Smelting Corporation (MSC)	Malaysia
CID001142	Metallic Resources, Inc.	USA
CID001173	Mineracao Taboca S.A.	Brazil
CID001182	Minsur	Peru
CID001191	Mitsubishi Materials Corporation	Japan
CID001231	Jiangxi New Nanshan Technology Ltd.	China
CID001314	O.M. Manufacturing (Thailand) Co., Ltd.	Thailand
CID001337	Operaciones Metalurgicas S.A.	Bolivia (Plurinational State of)
CID001399	PT Artha Cipta Langgeng	Indonesia
CID001402	PT Babel Inti Perkasa	Indonesia
CID001406	PT Babel Surya Alam Lestari	Indonesia
CID001453	PT Mitra Stania Prima	Indonesia
CID001458	PT Prima Timah Utama	Indonesia

Annex: list of known smelters

Conformant: Tin (continued)

Smelter ID	Standard smelter name	Country location
CID001460	PT Refined Bangka Tin	Indonesia
CID001468	PT Stanindo Inti Perkasa	Indonesia
CID001477	PT Timah Tbk Kundur	Indonesia
CID001482	PT Timah Tbk Mentok	Indonesia
CID001539	Rui Da Hung	Taiwan, Province of China
CID001758	Soft Metais Ltda.	Brazil
CID001898	Thaisarco	Thailand
CID001908	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	China
CID002036	White Solder Metalurgia e Mineracao Ltda.	Brazil
CID002158	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	China
CID002180	Yunnan Tin Company Limited	China
CID002468	Magnu's Minerais Metais e Ligas Ltda.	Brazil
CID002500	Melt Metais e Ligas S.A.	Brazil
CID002503	PT ATD Makmur Mandiri Jaya	Indonesia
CID002517	O.M. Manufacturing Philippines, Inc.	Philippines
CID002593	PT Rajehan Ariq	Indonesia
CID002706	Resind Industria e Comercio Ltda.	Brazil
CID002773	Metallo Belgium N.V.	Belgium
CID002774	Metallo Spain S.L.U.	Spain
CID002834	Thai Nguyen Mining and Metallurgy Co., Ltd.	Vietnam
CID002835	PT Menara Cipta Mulia	Indonesia
CID002844	HuiChang Hill Tin Industry Co., Ltd.	China
CID002848	Gejiu Fengming Metallurgy Chemical Plant	China
CID003116	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	China
CID003190	Chifeng Dajingzi Tin Industry Co., Ltd.	China
CID003205	PT Bangka Serumpun	Indonesia
CID003325	Tin Technology & Refining	USA
CID003379	Ma'anshan Weitai Tin Co., Ltd.	China
CID003381	PT Rajawali Rimba Perkasa	Indonesia
CID003387	Luna Smelter, Ltd.	Rwanda
CID003397	Yunnan Yunfan Non-ferrous Metals Co., Ltd.	China

Conformant: Tungsten

Smelter ID	Standard smelter name	Country location
CID000004	A.L.M.T. Corp.	Japan
CID000105	Kennametal Huntsville	USA
CID000218	Guangdong Xianglu Tungsten Co., Ltd.	China
CID000258	Chongyi Zhangyuan Tungsten Co., Ltd.	China
CID000568	Global Tungsten & Powders Corp.	USA
CID000766	Hunan Chenzhou Mining Co., Ltd.	China
CID000769	Hunan Chunchang Nonferrous Metals Co., Ltd.	China
CID000825	Japan New Metals Co., Ltd.	Japan
CID000875	Ganzhou Huaxing Tungsten Products Co., Ltd.	China
CID000966	Kennametal Fallon	USA
CID002044	Wolfram Bergbau und Hutten AG	Austria
CID002082	Xiamen Tungsten Co., Ltd.	China
CID002315	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	China
CID002316	Jiangxi Yaosheng Tungsten Co., Ltd.	China
CID002317	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	China
CID002318	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	China
CID002319	Malipo Haiyu Tungsten Co., Ltd.	China
CID002320	Xiamen Tungsten (H.C.) Co., Ltd.	China
CID002321	Jiangxi Gan Bei Tungsten Co., Ltd.	China
CID002494	Ganzhou Seadragon W & Mo Co., Ltd.	China
CID002502	Asia Tungsten Products Vietnam Ltd.	Vietnam
CID002513	Chenzhou Diamond Tungsten Products Co., Ltd.	China
CID002541	H.C. Starck Tungsten GmbH	Germany
CID002542	TANIOBIS Smelting GmbH & Co. KG	Germany
CID002543	Masan High-Tech Materials	Vietnam
CID002551	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	China
CID002589	Niagara Refining LLC	USA
CID002645	Ganzhou Haichuang Tungsten Co., Ltd.	China
CID002649	Hydrometallurg, JSC	Russian Federation
CID002724	Unecha Refractory metals plant	Russian Federation
CID002827	Philippine Chuangxin Industrial Co., Inc.	Philippines
CID002830	Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.	China
CID002833	ACL Metais Eireli	Brazil
CID002843	Woltech Korea Co., Ltd.	Korea, Republic of
CID002845	Moliren Ltd.	Russian Federation
CID003388	KGETS Co., Ltd.	Korea, Republic of
CID003401	Fujian Ganmin RareMetal Co., Ltd.	China
CID003407	Lianyou Metals Co., Ltd.	Taiwan, Province of China

Active

Active: Gold

Smelter ID	Standard smelter name	Country location
CID000711	Heraeus Germany GmbH Co. KG	Germany
CID002562	International Precious Metal Refiners	United Arab Emirates
CID003421	C.I Metales Procesados Industriales SAS	Colombia
CID003461	Augmont Enterprises Private Limited	India

Active: Tin

Smelter ID	Standard smelter name	Country location
CID000309	PT Aries Kencana Sejahtera	Indonesia
CID000448	Estanho de Rondonia S.A.	Brazil
CID001428	PT Bukit Timah	Indonesia
CID001486	PT Timah Nusantara	Indonesia
CID001490	PT Tinindo Inter Nusa	Indonesia
CID002455	CV Venus Inti Perkasa	Indonesia
CID002570	CV Ayi Jaya	Indonesia
CID002756	Super Ligas	Brazil
CID002870	PT Lautan Harmonis Sejahtera	Indonesia

Active: Tungsten

Smelter ID	Standard smelter name	Country location
CID002641	China Molybdenum Tungsten Co., Ltd.	China
CID003408	JSC “Kirovgrad Hard Alloys Plant”	Russian Federation
CID003416	NPP Tyazhmetprom LLC	Russian Federation
CID003427	Albasteel Industria e Comercio de Ligas Para Fundicao Ltd.	Brazil

Non-conformant

Non-conformant: Gold

Smelter ID	Standard smelter name	Country location
CID000103	Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	Turkey
CID000180	Caridad	Mexico
CID000197	Yunnan Copper Industry Co., Ltd.	China
CID000522	Refinery of Seemine Gold Co., Ltd.	China
CID000651	Guoda Safina High-Tech Environmental Refinery Co., Ltd.	China
CID000671	Hangzhou Fuchunjiang Smelting Co., Ltd.	China
CID000767	Hunan Chenzhou Mining Co., Ltd.	China
CID000773	Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd.	China
CID000778	HwaSeong CJ CO., LTD.	Korea, Republic of
CID000927	JSC Ekaterinburg Non-Ferrous Metal Processing Plant	Russian Federation
CID000956	Kazakhmys Smelting LLC	Kazakhstan
CID001032	L'azurde Company For Jewelry	Saudi Arabia
CID001056	Lingbao Gold Co., Ltd.	China
CID001058	Lingbao Jinyuan Tonghui Refinery Co., Ltd.	China
CID001093	Luoyang Zijin Yinhui Gold Refinery Co., Ltd.	China
CID001362	Penglai Penggang Gold Industry Co., Ltd.	China
CID001546	Sabin Metal Corp.	USA
CID001562	Samwon Metals Corp.	Korea, Republic of
CID001619	Shandong Tiancheng Biological Gold Industrial Co., Ltd.	China
CID001947	Tongling Nonferrous Metals Group Co., Ltd.	China
CID002282	Morris and Watson	New Zealand
CID002312	Guangdong Jinding Gold Limited	China
CID002515	Fidelity Printers and Refiners Ltd.	Zimbabwe
CID002525	Shandong Humon Smelting Co., Ltd.	China
CID002527	Shenzhen Zhonghenglong Real Industry Co., Ltd.	China
CID002563	Kaloti Precious Metals	United Arab Emirates
CID002567	Sudan Gold Refinery	Sudan
CID002584	Fujairah Gold FZC	United Arab Emirates
CID002587	Industrial Refining Company	Belgium
CID002588	Shirpur Gold Refinery Ltd.	India
CID002708	Abington Reldan Metals, LLC	USA
CID002852	GCC Gujrat Gold Centre Pvt. Ltd.	India
CID002853	Sai Refinery	India
CID002857	Modeltech Sdn Bhd	Malaysia
CID002865	Kyshtym Copper-Electrolytic Plant ZAO	Russian Federation
CID002867	Degussa Sonne / Mond Goldhandel GmbH	Germany
CID002872	Pease & Curren	USA
CID002893	JALAN & Company	India
CID003153	State Research Institute Center for Physical Sciences and Technology	Lithuania
CID003185	African Gold Refinery	Uganda
CID003186	Gold Coast Refinery	Ghana
CID003189	NH Recytech Company	Korea, Republic of
CID003324	QG Refining, LLC	USA
CID003348	Dijllah Gold Refinery FZC	United Arab Emirates
CID003382	CGR Metalloys Pvt Ltd.	India
CID003383	Sovereign Metals	India
CID003463	Kundan Care Products Ltd.	India

Non-conformant: Tin

Smelter ID	Standard smelter name	Country location
CID002015	VQB Mineral and Trading Group JSC	Vietnam
CID002572	Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company	Vietnam
CID002573	Nghe Tinh Non-Ferrous Metals Joint Stock Company	Vietnam
CID002574	Tuyen Quang Non-Ferrous Metals Joint Stock Company	Vietnam
CID002696	PT Cipta Persada Mulia	Indonesia
CID002703	An Vinh Joint Stock Mineral Processing Company	Vietnam
CID002858	Modeltech Sdn Bhd	Malaysia
CID003208	Pongpipat Company Limited	Myanmar
CID003356	Dongguan CiEXPO Environmental Engineering Co., Ltd.	China
CID003409	Precious Minerals and Smelting Limited	India
CID003410	Gejiu City Fuxiang Industry and Trade Co., Ltd.	China
CID003449	PT Mitra Sukses Globalindo	Indonesia

Non-conformant: Tungsten

Smelter ID	Standard smelter name	Country location
CID000281	CNMC (Guangxi) PGMA Co., Ltd.	China
CID002313	Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.	China
CID003417	GEM Co., Ltd.	China

Country of origin information by mineral

The following 87 countries of origin were identified based on the Smelters reported in suppliers' CMRT responses for the year ended 31 December 2020, the Reasonable Country of Origin Inquiry Data we received through our membership of the RMI and the LBMA Good Deliveries List as of 25 March 2021, and follow-up communications with RMI and LBMA.

Country	Gold	Tantalum	Tin	Tungsten
Argentina	●			
Australia	●	●	●	●
Austria				●
Azerbaijan	●			
Benin	●			
Bolivia	●	●	●	●
Botswana	●			
Brazil	●	●	●	●
Burkina Faso	●			
Burundi*		●	●	●
Canada	●			
Chile	●			
China	●	●	●	●
Colombia	●	●	●	●
Congo, Democratic Republic of the*	●	●	●	●
Costa Rica	●			
Cuba	●			
Cyprus	●			
Dominican Republic	●			
Ecuador	●			
Egypt	●			
Eritrea	●			
Ethiopia	●	●		
Fiji	●			
Finland	●			
France		●		
French Guyana	●			
Georgia	●			
Germany		●		

Country	Gold	Tantalum	Tin	Tungsten
Ghana	●			
Guatemala	●			
Guinea	●			
Guyana	●			
Honduras	●			
India		●		
Indonesia	●		●	
Ivory Coast	●			
Japan	●			
Kazakhstan	●			●
Kenya	●			
Laos	●		●	
Liberia	●			
Madagascar		●		
Malaysia	●	●	●	●
Mali	●			
Mauritania	●			
Mexico	●			●
Mongolia	●		●	●
Morocco	●			
Mozambique	●	●		
Myanmar		●	●	●
Namibia	●	●		
New Zealand	●			
Nicaragua	●			
Niger	●			
Nigeria		●	●	●
Papua New Guinea	●			
Peru	●		●	●

Country	Gold	Tantalum	Tin	Tungsten
Philippines	●			
Portugal			●	●
Puerto Rico	●			
Russian Federation	●	●	●	●
Rwanda*	●	●	●	●
Saudi Arabia	●			
Senegal	●			
Serbia	●			
Sierra Leone	●	●		
Slovakia	●			
Solomon Islands	●			
South Africa	●			
Spain	●	●	●	●
Suriname	●			
Sweden	●			
Taiwan			●	
Tajikistan	●			
Tanzania*	●			
Thailand		●	●	●
Turkey	●			
Uganda*	●	●	●	●
United Kingdom of Great Britain and Northern Ireland	●		●	●
United States of America	●		●	●
Uruguay	●			
Uzbekistan				●
Venezuela			●	
Vietnam			●	●
Zambia*	●			
Zimbabwe	●	●		●

* Covered Countries

View our previous reports on conflict minerals here.

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