

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

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**FORM SD**

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**SPECIALIZED DISCLOSURE REPORT**

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**AMERICAN OUTDOOR BRANDS CORPORATION**

(Exact name of registrant as specified in its charter)

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**NEVADA**  
(State or other jurisdiction of  
incorporation or organization)

**001-31552**  
(Commission  
File Number)

**87-0543688**  
(IRS Employer  
Identification No.)

**2100 Roosevelt Avenue,  
Springfield, Massachusetts**  
(Address of principal executive offices)

**01104**  
(Zip code)

**Jeffrey D. Buchanan, Exec. VP, CFO, CAO, and Treasurer – (800) 331-0852**  
(Name and telephone number, including area code, of the person to contact in connection with this report.)

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Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

- Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2018.

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**Section 1 Conflict Minerals Disclosure**

**Item 1.01 Conflict Minerals Disclosure and Report**

A copy of American Outdoor Brands Corporation Conflict Minerals Report is filed as Exhibit 1.01 hereto and is publicly available at [www.aob.com/conflictmineralsreport](http://www.aob.com/conflictmineralsreport). The content of our website as referred to in this Form SD is included for general information only and is not incorporated by reference into this Form SD.

**Item 1.02 Exhibits**

Exhibit 1.01 Conflict Minerals Report

**Section 2 Exhibits**

**Item 2.01 Exhibits**

The following exhibit is filed as part of this report:

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

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**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.

AMERICAN OUTDOOR BRANDS CORPORATION,  
a Nevada corporation

By: /s/ P. James Debney  
P. James Debney  
*President and Chief Executive Officer*

Dated: May 30, 2019

By: Jeffrey D. Buchanan  
Jeffrey D. Buchanan  
*Executive Vice President, Chief Financial Officer,  
Chief Administrative Officer, and Treasurer*

Dated: May 30, 2019



**AMERICAN OUTDOOR BRANDS CORPORATION**  
**CONFLICT MINERALS REPORT**  
**FOR THE REPORTING PERIOD**  
**JANUARY 1, 2018 TO DECEMBER 31, 2018**

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## INTRODUCTION

This Conflict Minerals Report for American Outdoor Brands Corporation (“**AOBC**,” “**Company**,” “**we**,” or “**our**”) is provided for the reporting period January 1, 2018 to December 31, 2018, and is presented to comply with Rule 13p-1 under the Securities Exchange Act of 1934 (the “**Rule**”), and the Public Statement on the Effect of the Recent Court of Appeals Decision on the Conflict Minerals Rule issued by the Director of the Division of Corporation Finance of the Securities and Exchange Commission on April 29, 2014 (the “**SEC Statement**”). The Rule was adopted by the Securities and Exchange Commission (the “**SEC**”) to implement reporting and disclosure requirements related to conflict minerals as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act (“**Dodd-Frank Act**”). The Rule imposes certain reporting obligations on SEC registrants whose manufactured products contain tin, tantalum, tungsten, or gold (“**3TG**,” also defined by the Rule as “conflict minerals”), and who have reason to believe that the products they manufacture, or contract to manufacture, contain conflict minerals that are necessary to the functionality or production of those products. If the SEC registrant has reason to believe that any conflict minerals may have originated in the Democratic Republic of the Congo or an adjoining country, or is unable to determine the country of origin of those conflict minerals, the SEC registrant is required to submit a Conflict Minerals Report to the SEC that includes a description of the measures it took to exercise due diligence on the conflict minerals’ source and chain of custody.

## COMPANY BACKGROUND

AOBC is a leading manufacturer, designer and provider of consumer products for the shooting, hunting, and rugged outdoor enthusiast. The Company reports two segments: Firearms and Outdoor Products & Accessories. Firearms manufactures handguns, long guns, handcuffs, suppressors, and other firearm-related products to a wide variety of customers, including gun enthusiasts, collectors, hunters, sportsmen, competitive shooters, individuals desiring home and personal protection, law enforcement and security agencies and officers, and military agencies in the United States and throughout the world. We sell our firearm products under the Smith & Wesson, M&P, Performance Center, Thompson/Center Arms, and Gemtech brands. We also provide manufacturing, forging, machining, and precision plastic injection molding services. In Outdoor Products & Accessories, we design, source, distribute, and manufacture reloading, gunsmithing, and gun cleaning supplies; high-quality stainless-steel cutting tools and accessories; flashlights; tree saws and related trimming accessories; shooting supplies, rests, and other related accessories; apparel; vault accessories; laser grips and laser sights; and a full range of products for survival and emergency preparedness. Brands in Outdoor Products & Accessories include Caldwell, Wheeler, Tipton, Frankford, Arsenal, Lockdown, Hooyman, BOG, Crimson Trace, Imperial, Schrade, Old Timer, Uncle Henry, BUBBA, Smith & Wesson, M&P, Thompson/Center, and UST.

A copy of the Company’s Conflict Mineral Policy is available on our website at [www.aob.com/conflictmineralsreport](http://www.aob.com/conflictmineralsreport).

## REPORT

This Conflict Minerals Report is provided for the reporting period January 1, 2018 to December 31, 2018 in accordance with the Rule, the instructions to Form SD, and the SEC Statement. Please refer to the Rule, Form SD and Securities Exchange Release No. 34-67716 for definitions to the terms used in this Report, unless otherwise defined herein.

In accordance with the Rule and the instructions to Form SD, AOBC undertook due diligence to determine the source of origin of any necessary conflict minerals used in products it manufactures or contracts to manufacture. In conducting its due diligence, AOBC implemented the Organization for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (including the Supplements on Tin, Tantalum and Tungsten, and the Gold Supplement) (Second Edition OECD 2013) (“**OECD Guidance**”), an internationally recognized due diligence framework.

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### Design of Our Due Diligence Measures

Our conflict minerals due diligence measures have been designed to conform with the OECD Guidance, as applicable, for tin, tantalum, tungsten, gold and downstream companies (as the term is defined in the OECD Guidance), in all material respects. The Company does not make direct purchases of raw ore or unrefined conflict minerals in the Covered Countries. We designed our due diligence measures to:

1. design and implement strategies to determine the presence of conflict minerals in our products;
2. establish management systems for supply chain due diligence and reporting compliance;
3. identify and assess conflict minerals content in our supply chain;
4. identify and mitigate any risk for potential non-compliance with the Rule; and
5. report on our conflict minerals supply chain due diligence activities, as required by the Rule.

### Due Diligence Measures Performed

Our due diligence measures for the reporting period January 1, 2018 to December 31, 2018 included the following activities:

1. We updated our product taxonomy for the products that were subject to reporting in the 2018 reporting period, and reviewed additions with company product managers, engineers, metallurgists and supply chain personnel, to determine which products or components have the possibility of containing necessary conflict minerals.
2. We surveyed any suppliers involved with products or components we determined could possibly contain necessary conflict minerals, to ascertain for each of these conflict minerals (i) whether the product or component contained necessary conflict minerals, (ii) the smelter or refiner where it was processed, (iii) its country of origin, and (iv) its mine of origin.
3. We leveraged the due diligence conducted on smelters and refiners by the Responsible Minerals Initiative (the “**RMI**”), and its Responsible Minerals Assurance Process (the “**RMAP**”), by comparing the names of the smelters identified by our suppliers to those identified as compliant in the RMAP. The RMAP uses independent private sector auditors to audit the source, including mines of origin, and chain of custody of the conflict minerals used by smelters and refiners that agree to participate in the RMAP. The smelters and refiners that are found to be RMAP compliant are those for which the independent auditor has verified that the smelter’s or refiner’s conflict minerals originated from conflict free mines and trading in the Democratic Republic of the Congo or any of its adjoining countries. A list of smelters identified to date, and associated information, is provided hereto as **Attachment A**.

After conducting good faith due diligence on the presence of necessary conflict minerals in certain of the Company’s products, AOBC has been unable to identify all smelters, refiners in its supply chain and the ultimate source of origin of such minerals. The Company is continuing its efforts to identify and mitigate risks in its supply chain and to obtain complete information from its upstream suppliers. The Company’s efforts are necessarily dependent upon the willingness of its supply chain participants to cooperate and assist in this endeavor and there can be no guarantee that the Company will be able to obtain adequate and reliable information upon which to base its analysis.

**Attachment A  
SMELTER DETAILS**

Abington Reldan Metals, LLC	UNITED STATES	Gold
Advanced Chemical Company	UNITED STATES	Gold
Aida Chemical Industries Co. Ltd.	JAPAN	Gold
Al Etihad Gold Refinery DMCC	UNITED ARAB EMIRATES	Gold
Allgemeine Gold- und Silberscheideanstalt A.G.	GERMANY	Gold
Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN	Gold
AngloGold Ashanti Corrego do Sitio Mineracao	BRAZIL	Gold
Anhui Tongling Nonferrous Metal Mining Co., Ltd.	CHINA	Gold
Argor-Heraeus S.A.	SWITZERLAND	Gold
Asahi Pretec Corp.	JAPAN	Gold
Asahi Refining Canada Ltd.	CANADA	Gold
Asahi Refining USA Inc.	UNITED STATES	Gold
Asaka Riken Co., Ltd.	JAPAN	Gold
ATAkulche	TURKEY	Gold
AU Traders and Refiners	SOUTH AFRICA	Gold
Aurubis AG	GERMANY	Gold
Bangalore Refinery	INDIA	Gold
Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES	Gold
Boliden AB	SWEDEN	Gold
C. Hafner GmbH + Co. KG	GERMANY	Gold
Caridad	MEXICO	Gold
CCR Refinery - Glencore Canada Corporation	CANADA	Gold
Cendres + Metaux S.A.	SWITZERLAND	Gold
Chimet S.p.A.	ITALY	Gold
Chugai Mining	JAPAN	Gold
Daejin Indus Co., Ltd.	KOREA,	
Daye Non-Ferrous Metals Mining Ltd.	REPUBLIC OF CHINA	Gold
Degussa Sonne / Mond Goldhandel GmbH	GERMANY	Gold
Dowa	JAPAN	Gold
DSC (Do Sung Corporation)	KOREA,	
Eco-System Recycling Co., Ltd.	REPUBLIC OF JAPAN	Gold
Elemental Refining, LLC	UNITED STATES	Gold
Emirates Gold DMCC	UNITED ARAB EMIRATES	Gold
Faggi Enrico S.p.A.	ITALY	Gold
Fidelity Printers and Refiners Ltd.	ZIMBABWE	Gold
Geib Refining Corporation	UNITED STATES	Gold

Gold Refinery of Zijin Mining Group Co., Ltd.	CHINA	Gold
Great Wall Precious Metals Co., Ltd.	CHINA	Gold
Guangdong Gaoyao Co	CHINA	Gold
Gujarat Gold Centre	INDIA	Gold
Guoda Safina High-Tech Environmental Refinery Co., Ltd.	CHINA	Gold
Hangzhou Fuchunjiang Smelting Co., Ltd.	CHINA	Gold
HeeSung Metal Ltd.	KOREA, REPUBLIC OF	Gold
Heimerle + Meule GmbH	GERMANY	Gold
Heraeus	UNITED STATES	Gold
Heraeus Ltd Hong Kong	HONG KONG	Gold
Heraeus Metals Hong Kong Ltd.	CHINA	Gold
Heraeus Precious Metals GmbH & Co. KG	GERMANY	Gold
Hunan Chenzhou Mining Co., Ltd.	CHINA	Gold
HwaSeong CJ Co., Ltd.	KOREA, REPUBLIC OF	Gold
Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CHINA	Gold
Ishifuku Metal Industry Co., Ltd.	JAPAN	Gold
Istanbul Gold Refinery	TURKEY	Gold
Japan Mint	JAPAN	Gold
Jiangxi Copper Co., Ltd.	CHINA	Gold
JSC Ekaterinburg Non-Ferrous Metal Processing Plant	RUSSIAN FEDERATION	Gold
JSC Uralelectromed	RUSSIAN FEDERATION	Gold
JX Nippon Mining & Metals Co., Ltd	JAPAN	Gold
Kaloti Precious Metals	UNITED ARAB EMIRATES	Gold
Kazzakhmys Smelting LLC	KAZAKHSTAN	Gold
Kazzinc	KAZAKHSTAN	Gold
Kennecott Utah Copper LLC	UNITED STATES	Gold
KGHM Polska Miedz S.A.	POLAND	Gold
Kojima Chemicals Co., Ltd.	JAPAN	Gold
Korea Zinc Co., Ltd.	KOREA, REPUBLIC OF	Gold
Kyrgyzaltyn JSC	KYRGYZSTAN	Gold
Kyshtym Copper-Electrolytic Plant ZAO	RUSSIAN FEDERATION	Gold
L'azurde Company For Jewelry	SAUDI ARABIA	Gold
Lingboa Gold Co., Ltd.	CHINA	Gold
Lingboa Jinyuan Tonghui Refinery Co., Ltd.	CHINA	Gold
L'Orfebre S.A.	ANDORRA	Gold
LS-NIKKO Copper Inc.	KOREA (REPUBLIC OF)	Gold
Luoyang Zijin Yinhui Gold Refinery Co., Ltd.	CHINA	Gold

Marsam Metals	BRAZIL	Gold
Materion	UNITED STATES	Gold
Matsuda Sangyo Co. Ltd	JAPAN	Gold
Metalor Technologies (Hong Kong) Ltd.	CHINA	Gold
Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE	Gold
Metalor Technologies (Suzhou) Ltd.	CHINA	Gold
Metalor Technologies S.A.	SWITZERLAND	Gold
Metalor USA Refining Corporation	UNITED STATES	Gold
Metalurgica Met-Mex Penoles S.A. De C.V.	MEXICO	Gold
Mitsubishi Materials Corporation	JAPAN	Gold
Mitsui Mining & Smelting Co., Ltd.	JAPAN	Gold
MMTC-PAMP India Pvt., Ltd.	INDIA	Gold
Modeltech Sdn Bhd	MALAYSIA	Gold
Morris and Watson	NEW ZEALAND	Gold
Morris and Watson Gold Coast	AUSTRALIA	Gold
	RUSSIAN	
Moscow Special Alloys Processing Plant	FEDERATION	Gold
Nadir Metal Rafineri San. Ve Tic. A.S.	TURKEY	Gold
Navoi Mining and Metallurgical Combinat	UZBEKISTAN	Gold
Nihon Material Co., Ltd.	JAPAN	Gold
Niihama Toyo Smelter & Refinery	JAPAN	Gold
Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	AUSTRIA	Gold
Ohura Precious Metal Industry Co., Ltd.	JAPAN	Gold
	RUSSIAN	
OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	FEDERATION	Gold
	RUSSIAN	
OJSC Novosibirsk Refinery	FEDERATION	Gold
PAMP S.A.	SWITZERLAND	Gold
Pease & Curren	UNITED STATES	Gold
Penglai Penggang Gold Industry Co., Ltd.	CHINA	Gold
	RUSSIAN	
Prioksky Plant of Non-Ferrous Metals	FEDERATION	Gold
PT Aneka Tambang (Persero) Tbk	INDONESIA	Gold
PX Precinox S.A.	SWITZERLAND	Gold
Rand Refinery (Pty) Ltd.	SOUTH AFRICA	Gold
Remondis PMR B.V.	NETHERLANDS	Gold
Republic Metals Corporation	UNITED STATES	Gold
Royal Canadian Mint	CANADA	Gold
SAAMP	FRANCE	Gold
Sabin Metal Corp.	UNITED STATES	Gold
Safimet S.p.A.	ITALY	Gold
Safina A.S.	CZECH REPUBLIC	Gold
Sai Refinery	INDIA	Gold



Samduck Precious Metals	KOREA, REPUBLIC OF	Gold
Samwon Metals Corp.	KOREA, REPUBLIC OF	Gold
SAXONIA Edelmetalle GmbH	GERMANY	Gold
Schone Edelmetaal B.V.	NETHERLANDS	Gold
SEMPSA Joyeria Plateria S.A.	SPAIN	Gold
Shandong Tiancheng Biological Gold Industrial Co., Ltd.	CHINA	Gold
Shandong Zhaojin Gold & Silver Refinery Co., Ltd	CHINA	Gold
Sichuan Tianze Precious Metals Co., Ltd.	CHINA	Gold
Singway Technology Co., Ltd.	TAIWAN, PROVINCE OF	
So Accurate Group, Inc.	CHINA	Gold
SOE Shyolkovsky Factory of Secondary Precious Metals	UNITED STATES	Gold
Solar Applied Materials Taiwan	RUSSIAN FEDERATION	Gold
Solar Applied Materials Technology Corp.	TAIWAN	Gold
State Research Institute Center for Physical Sciences and Technology	TAIWAN, PROVINCE OF	
Sudan Gold Refinery	CHINA	Gold
Sumitomo Metal Mining Co. Ltd.	LITHUANIA	Gold
SungEel HiTech	SUDAN	Gold
T.C.A S.p.A	JAPAN	Gold
Tanaka Kikinzoku Kogyo K.K.	KOREA, REPUBLIC OF	Gold
The Refinery of Shandong Gold Mining Co., Ltd.	ITALY	Gold
Tokuriki Honten Co., Ltd.	JAPAN	Gold
Tongling Nonferrous Metals Group Co., Ltd.	CHINA	Gold
Tony Goetz NV	JAPAN	Gold
TOO Tau-Ken-Altyn	CHINA	Gold
Torecom	BELGIUM	Gold
Umicore Brasil Ltda.	KAZAKHSTAN	Gold
Umicore Precious Metals Thailand	KOREA, REPUBLIC OF	Gold
Umicore S.A. Business Unit Precious Metals Refining	BRAZIL	Gold
United Precious Metal Refining Zambia	THAILAND	Gold
United Precious Metal Refining, Inc.	BELGIUM	Gold
Valcambi S.A.	ZAMBIA	Gold
Western Australian Mint (T/a The Perth Mint)	UNITED STATES	Gold
WIELAND Edelmetalle GmbH	SWITZERLAND	Gold
Xing Hong Tai Xi Ye Co. Ltd.	AUSTRALIA	Gold
Yamakin Co., Ltd.	GERMANY	Gold
Yokohama Metal Co., Ltd.	CHINA	Gold
	JAPAN	Gold
	JAPAN	Gold

Yunnan Copper Industry Co., Ltd.	CHINA	Gold
Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA	Gold
AVX	UNITED STATES	Tantalum
Cabot Corporation	UNITED STATES	Tantalum
Changsha South Tantalum Niobium Co., Ltd.	CHINA	Tantalum
D Block Metals, LLC	UNITED STATES	Tantalum
Duoluoshan	CHINA	Tantalum
Exotech Inc.	UNITED STATES	Tantalum
F&X Electro-Materials Ltd.	CHINA	Tantalum
FIR Metals & Resource Ltd.	CHINA	Tantalum
Global Advanced Metals Aizu	JAPAN	Tantalum
Global Advanced Metals Boyertown	UNITED STATES	Tantalum
Guangdong Rising Rare Metals - EO Materials Ltd.	CHINA	Tantalum
Guangdong Zhiyuan New Material Co., Ltd.	CHINA	Tantalum
H.C. Starck Co., Ltd.	THAILAND	Tantalum
H.C. Starck Hermsdorf GmbH	GERMANY	Tantalum
H.C. Starck Inc.	UNITED STATES	Tantalum
H.C. Starck Ltd.	JAPAN	Tantalum
H.C. Starck Smelting GmbH & Co. KG	GERMANY	Tantalum
H.C. Starck Tantalum and Niobium GmbH	GERMANY	Tantalum
Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA	Tantalum
Jiangsu Shagang Group Huaigang Special Steel Co., Ltd	CHINA	Tantalum
Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHINA	Tantalum
Jiangxi Tuohong New Raw Material	CHINA	Tantalum
JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINA	Tantalum
Jiujiang Tanbre Co., Ltd.	CHINA	Tantalum
Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA	Tantalum
KEMET Blue Metals	CHINA	Tantalum
KEMET Blue Powder	MEXICO	Tantalum
LSM Brasil S.A.	UNITED STATES	Tantalum
Metallurgical Products India Pvt., Ltd.	BRAZIL	Tantalum
Mineracao Taboca S.A.	INDIA	Tantalum
Mitsui Mining & Smelting Co., Ltd.	BRAZIL	Tantalum
Ningxia Orient Tantalum Industry Co., Ltd.	JAPAN	Tantalum
NPM Silmet AS	CHINA	Tantalum
Plansee SE Liezen	ESTONIA	Tantalum
Plansee SE Reutte	AUSTRIA	Tantalum
	AUSTRIA	Tantalum
	MACEDONIA, THE FORMER	
	YUGOSLAV	
Power Resources Ltd.	REPUBLIC OF	Tantalum
Qian'an City Jiujiang Wire Co., Ltd	CHINA	Tantalum

QuantumClean	UNITED STATES	Tantalum
Resind Industria e Comercio Ltda.	BRAZIL	Tantalum
Shanghai Baosteel Group Corporation	CHINA	Tantalum
	RUSSIAN	
Solikamsk Magnesium Works OAO	FEDERATION	Tantalum
Taki Chemical Co., Ltd.	JAPAN	Tantalum
Telex Metals	UNITED STATES	Tantalum
Ulba Metallurgical Plant JSC	KAZAKHSTAN	Tantalum
XinXing HaoRong Electronic Material Co., Ltd.	CHINA	Tantalum
Yanling Jincheng Tantalum & Niobium Co., Ltd.	CHINA	Tantalum
Alpha	UNITED STATES	Tin
Amalgamated Metals Corporation, Ketabang	UNITED KINGDOM	Tin
An Vinh Joint Stock Mineral Processing Company	VIET NAM	Tin
Best Metals	BRAZIL	Tin
Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CHINA	Tin
Chian	CHINA	Tin
China Tin Group Co., Ltd.	CHINA	Tin
CNMC (Guangxi) PGMA Co., Ltd.	CHINA	Tin
CV Ayi Jaya	INDONESIA	Tin
CV Dua Sekawan	INDONESIA	Tin
CV Gita Pesona	INDONESIA	Tin
CV Tiga Sekawan	INDONESIA	Tin
CV United Smelting	INDONESIA	Tin
CV Venus Inti Perkasa	INDONESIA	Tin
Dongguan City Thousand Island Metal Tin Co., Ltd.	CHINA	Tin
Dowa	JAPAN	Tin
Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company	VIET NAM	Tin
	BOLIVIA	
	(PLURINATIONAL	
EM Vinto	STATE OF)	Tin
Estanho de Rondonia S.A.	BRAZIL	Tin
Fenix Metals	POLAND	Tin
Gejiu Fengming Metallurgy Chemical Plant	CHINA	Tin
Gejiu Jinye Mineral Company	CHINA	Tin
Gejiu Kai Meng Industry and Trade LLC	China	Tin
Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA	Tin
Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	CHINA	Tin
Gejiu Zili Mining and Metallurgy Co., Ltd.	CHINA	Tin
Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CHINA	Tin
Guangdong Zhongshi Metal Co., Ltd	CHINA	Tin
Guanyang Guida Nonferrous Metal Smelting Plant	CHINA	Tin

He Nan Yu Gang	CHINA	Tin
HuiChang Hill Tin Industry Co., Ltd.	CHINA	Tin
Huichang Jinshunda Tin Co., Ltd.	CHINA	Tin
IBF IND Brasileira de Ferroligas Ltd.	BRAZIL	Tin
Jiangxi New Nanshan Technology Ltd.	CHINA	Tin
Jiangyin Juneng Aluminum Company	CHINA	Tin
Jun Hon Ji	CHINA	Tin
Magnu's Minerais Metais e Ligas Ltda.	BRAZIL	Tin
Malaysia Smelting Corporation (MSC)	MALAYSIA	Tin
MCP Metal Specialties, Inc.	UNITED STATES	Tin
Melt Metais e Ligas S.A.	BRAZIL	Tin
Metallic Resources, Inc.	UNITED STATES	Tin
Metallo Belgium N.V.	BELGIUM	Tin
Metallo Spain S.L.U.	SPAIN	Tin
Mineracao Taboca S.A.	BRAZIL	Tin
Minsur	PERU	Tin
Mitsubishi Materials Corporation	JAPAN	Tin
Modeltech Sdn Bhd	MALAYSIA	Tin
Nighe Tinh Non-Ferrous Metals Joint Stock Company	VIET NAM	Tin
O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND	Tin
O.M. Manufacturing Philippines, Inc.	PHILIPPINES	Tin
	BOLIVIA	
	(PLURINATIONAL	
Operaciones Metalurgical S.A.	STATE OF)	Tin
PT Aries Kencana Sejahtera	INDONESIA	Tin
PT Artha Cipta Langgeng	INDONESIA	Tin
PT ATD Makmur Mandiri Jaya	INDONESIA	Tin
PT Babel Inti Perkasa	INDONESIA	Tin
PT Bangka Prima Tin	INDONESIA	Tin
PT Bangka Tin Industry	INDONESIA	Tin
PT Belitung Industri Sejahtera	INDONESIA	Tin
PT Bukit Timah	INDONESIA	Tin
PT DS Jaya Abadi	INDONESIA	Tin
PT Inti Stania Prima	INDONESIA	Tin
PT Karimun Mining	INDONESIA	Tin
PT Kijang Jaya Mandiri	INDONESIA	Tin
PT LAUTAN HARMONIS SEJAHTERA	INDONESIA	Tin
PT Lautan Harmonis Sejahtera	INDONESIA	Tin
PT Menara Cipta Mulia	INDONESIA	Tin
PT Mitra Stania Prima	INDONESIA	Tin
PT O.M. Indonesia	INDONESIA	Tin

PT Panca Mega Persada	INDONESIA	Tin
PT Premium Tin Indonesia	INDONESIA	Tin
PT Prima Timah Utama	INDONESIA	Tin
PT Rajehan Ariq	INDONESIA	Tin
PT Refined Bangka Tin	INDONESIA	Tin
PT Sariwiguna Binasentosa	INDONESIA	Tin
PT Stanindo Inti Perkasa	INDONESIA	Tin
PT Sukses Inti Makmur	INDONESIA	Tin
PT Sumber Jaya Indah	INDONESIA	Tin
PT Timah	INDONESIA	Tin
PT Timah (Persero) Tbk Kundur	INDONESIA	Tin
PT Timah (Persero) Tbk Mentok	INDONESIA	Tin
PT Tinindo Inter Nusa	INDONESIA	Tin
PT Tommy Utama	INDONESIA	Tin
Resind Industria e Comercio Ltda.	BRAZIL	Tin
	TAIWAN,	
	PROVINCE OF	
Rui Da Hung	CHINA	Tin
Soft Metais Ltda.	BRAZIL	Tin
Super Ligas	BRAZIL	Tin
Thailand Smelting and Refining Co. Ltd.	THAILAND	Tin
Thaisarco	THAILAND	Tin
Tuyen Quang Non-Ferrous Metals Joint Stock Company	VIET NAM	Tin
VQB Mineral and Trading Group JSC	VIET NAM	Tin
White Solder Metalurgia e Mineracao Ltda.	BRAZIL	Tin
XiHai	CHINA	Tin
Yifeng Tin Industry Co., Ltd	CHINA	Tin
Yuecheng Tin	CHINA	Tin
Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA	Tin
Yunnan Tin Co., LTD	China	Tin
Yunnan Tin Company Limited	CHINA	Tin
A.L.M.T. TUNGSTEN Corp.	JAPAN	Tungsten
ACL Metais Eireli	BRAZIL	Tungsten
Chenzhou Diamond Tungsten Products Co., Ltd.	CHINA	Tungsten
Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA	Tungsten
Cosco (JM) Aluminum Development Co., Ltd	CHINA	Tungsten
Dongguan Meigu Outdoor Toos Co., Ltd.	CHINA	Tungsten
Fujian Jinxin Tungsten Co., Ltd.	CHINA	Tungsten
Ganzhou Haichuang Tungsten Co., Ltd.	CHINA	Tungsten
Ganzhou Huaxing Tungsten Products Co., Ltd.	CHINA	Tungsten
Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHINA	Tungsten

Ganzhou Seadragon W & Mo Co., Ltd.	CHINA	Tungsten
Global Tungsten & Powders Corp.	UNITED STATES	Tungsten
Guangdong Xianglu Tungsten Co., Ltd.	CHINA	Tungsten
H.C. Starck GmbH	GERMANY	Tungsten
H.C. Starck Smelting GmbH & Co. KG	GERMANY	Tungsten
H.C. Starck Tungsten GmbH	GERMANY	Tungsten
Hdrometallurg, JSC	RUSSIAN	
Hunan Chenzhou Mining Co., Ltd.	FEDERATION	Tungsten
Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji	CHINA	Tungsten
Hunan Chunchang Nonferrous Metals Co., Ltd.	CHINA	Tungsten
Hunan NonFerrous Metals Holding Group Co., Ltd.	CHINA	Tungsten
Hydrometallurg, JSC	RUSSIAN	
Japan New Metals Co., Ltd.	FEDERATION	Tungsten
Jiangsu Shagang Group Huyaigang Special Steel Co., LTD	JAPAN	Tungsten
Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA	Tungsten
Jiangxi Dayu Longxintai Tungsten Co., Ltd.	CHINA	Tungsten
Jiangxi Gan Bei Tungsten Co., Ltd.	CHINA	Tungsten
Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.	CHINA	Tungsten
Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHINA	Tungsten
Jiangxi Xinsheng Tungsten Industry Co., Ltd	CHINA	Tungsten
Jiangxi Yaosheng Tungsten Co., Ltd.	CHINA	Tungsten
Kennametal Fallon	CHINA	Tungsten
Kennametal Huntsville	UNITED STATES	Tungsten
Malipo Haiyu Tungsten Co., Ltd.	UNITED STATES	Tungsten
Masan Tungsten Chemical LLC (MTC)	CHINA	Tungsten
Mo Yang Maoyi Company	VIET NAM	Tungsten
Moliren Ltd.	CHINA	Tungsten
Moyang Trading Company	RUSSIAN	
Niagara Refining LLC	FEDERATION	Tungsten
Philippine Chuangxin Industrial Co., Inc.	CHINA	Tungsten
Qian'an City Jiuji Wire Co., LTD	UNITED STATES	Tungsten
South-East Nonferrous Metal Company Limited of Hengyang City	PHILIPPINES	Tungsten
Tejing (Vietnam) Tungsten Co., Ltd.	CHINA	Tungsten
Tiamning Furen Group	CHINA	Tungsten
Unecha Refractory Metals Plant	VIET NAM	Tungsten
Wolfram Bergbau und Hutten AG	CHINA	Tungsten
Woltech Korea Co., Ltd.	RUSSIAN	
Xiamen Tungsten (H.C.) Co., Ltd.	FEDERATION	Tungsten
	AUSTRIA	Tungsten
	KOREA,	
	REPUBLIC OF	Tungsten
	CHINA	Tungsten

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Xiamen Tungsten Co., Ltd.	CHINA	Tungsten
Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.	CHINA	Tungsten
Xinhai Rendan Shaoguan Tungsten Co., Ltd.	CHINA	Tungsten
Yangchun Xinda Special Steel Industrial Co., Ltd.	CHINA	Tungsten
Yangchun Yongsheng Metal Products Co, Ltd.	CHINA	Tungsten
Yangjiang Meigao Stainless Steel	CHINA	Tungsten
Yangjiang Muyang Trading Co., Ltd.	CHINA	Tungsten