

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

FORM SD

Specialized Disclosure Report

VOXX INTERNATIONAL CORPORATION

(Exact name of registrant as specified in its charter)

Delaware
(State or other jurisdiction of
incorporation or organization)

0-28839
(Commission File Number)

13-1964841
(IRS Employer Identification No.)

2351 J Lawson Blvd., Orlando, Florida
(Address of principal executive offices)

32824
(Zip Code)

Loriann Shelton (800) 645-7750 (Name and telephone number, including area code, of the person to contact in connection with this report)

Registrant's telephone number, including area code (800) 645-7750

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, 2020.

SECTION 1 - CONFLICT MINERALS DISCLOSURE

Item 1.01 Conflict Minerals Disclosure and Report

As provided for in Rule 13p-1 under the Securities Exchange Act of 1934, as amended, and Form SD, VOXX International Corporation's Conflict Minerals Report for the year ended December 31, 2020 is provided as an Exhibit to this Form SD and is publicly available at: <http://investors.voxxintl.com/financial-information/sec-filings>

Item 1.02 Exhibit

The Conflict Minerals Report described in Item 1.01 is filed as [Exhibit 1.01](#) to this Form SD.

SECTION 2 - EXHIBITS

Item 2.01 Exhibits

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

SIGNATURES

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

VOXX International Corporation (Registrant)

Date: May 28, 2021

BY: /s/ Patrick Lavelle
Patrick Lavelle
President and
Chief Executive Officer

VOXX International Corporation
Conflict Minerals Report
For The Year Ended December 31, 2020

This is the Conflict Minerals Report of VOXX International Corporation (herein referred to as “Voxx,” the “Company,” “we,” “us,” or “our”) for Calendar Year 2020 in accordance with Rule 13p-1 under the Securities Exchange Act of 1934, as amended (the “Conflict Minerals Rule”). Please refer to Rule 13p-1, Form SD, and the 1934 Act Release No. 34-67716 for definitions to the terms used in this Report, unless otherwise defined herein.

The Conflict Minerals Rule was adopted by the Securities and Exchange Commission (“SEC”) to implement reporting and disclosure requirements related to conflict minerals as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (“Dodd-Frank Act”). The Conflict Minerals Rule imposes certain reporting obligations on SEC registrants whose manufactured products contain conflict minerals that are necessary to the functionality or production of their products. Conflict Minerals are defined as cassiterite, columbite-tantalite, gold, wolframite, and their derivatives, which are limited to tin, tantalum, tungsten, and gold (“3TG”) for the purposes of this assessment. These requirements apply to registrants whatever the geographic origin of the conflict minerals and whether or not they fund armed conflict.

If a registrant can establish that the conflict minerals originated from sources other than the Democratic Republic of the Congo or an adjoining country (the “Covered Countries”), or from recycled and scrap sources, the registrant must submit a Form SD which describes the Reasonable Country of Origin Inquiry completed.

If a registrant has reason to believe that any of the conflict minerals in its supply chain may have originated in the Covered Countries, or if it is unable to determine the country of origin of those conflict minerals, then the issuer must exercise due diligence on the conflict minerals’ source and chain of custody. The registrant must annually submit a report, Conflict Minerals Report (“CMR”), to the SEC that includes a description of those due diligence measures.

Company Overview and Supply Chain

We support the humanitarian goal of the Dodd-Frank Act in ending the illegal trade of Conflict Minerals originating in the Covered Countries, while supporting legitimate commercial ventures in the region. We do not purchase any Conflict Minerals directly from any source. We are dedicated to working with our suppliers to increase transparency regarding the origin of minerals contained in our products.

Product Lines: Voxx is a leading international manufacturer and distributor operating within the Automotive Electronics, Consumer Electronics and Biometrics industries. Our principle products include mobile multi-media infotainment products, including overhead, seat-back, and headrest systems; automotive security, remote start systems, and vehicle access systems; satellite radio products, including plug and play models and direct connect models; smartphone telematics applications; mobile interface modules; automotive power accessories; power lift gates; driver distraction products; rear observation and collision avoidance systems; turn signal switches; automotive lighting products; automotive sensing and camera systems; USB ports; cruise control systems; heated seats; home theater systems; premium loudspeakers; outdoor speakers; architectural speakers; commercial and cinema speakers; business and streaming music systems; wireless and Bluetooth speakers and soundbars; wired, wireless, and Bluetooth headphones and ear buds; DLNA (Digital Living Network Alliance) compatible devices; remote controls; karaoke products; personal sound amplifiers; infant/nursery products; High-Definition Television ("HDTV") and Wireless Fidelity ("WiFi") antennas; High-Definition Multimedia Interface ("HDMI") accessories; home electronic accessories such as cabling, power cords, charging products, power supply systems, and other connectivity products; performance enhancing electronics; flat panel TV mounting systems; electronic equipment cleaning products; set-top boxes; and iris identification and biometric security related products. We conducted an analysis of our products and found that tin, tantalum, tungsten, and gold (3TG) are found in substantially all of our products.

Determination of In-Scope Products: We are subject to the Conflict Mineral Rule because certain products that we manufacture and distribute contain 3TG that are necessary to the functionality or production of the products; however, we do not directly source 3TG from mines, smelters, or refiners. We believe that in most cases, we are several steps removed in the supply chain from these market participants, limiting our influence over their sourcing. Furthermore, because of the depth, geographic diversity, complexity, and evolution of our supply chain, and due to competitive factors, we have difficulty identifying market participants above our direct suppliers in the supply chain and must rely on our direct suppliers to work with their upstream suppliers in order that they may provide us with accurate information about the origin of 3TG in the components we purchase.

Determination: For 2020, we did not find that any of the necessary 3TG contained in our products directly or indirectly financed or benefitted armed groups in the DRC or an adjoining country; however, we did not conclude that any of our products were “DRC conflict free,” because there are too many remaining unknowns. Furthermore, given that Voxx has not voluntarily elected to describe any of its products as “DRC conflict free,” an independent private sector audit of the report presented herein has not been conducted. Our use of the terms “adjoining country,” “armed group” and “DRC conflict free” have the same meanings as those provided in the Conflict Minerals Rule.

Conflict Minerals Policy

Voxx strongly disapproves of the violence in the DRC and adjoining countries. We have a DRC Conflict Minerals sourcing policy setting forth that the Company does not knowingly source metals that come from conflict mines in the Eastern provinces of the Democratic Republic of Congo or adjoining countries (the “Conflict Region”). The Company has no policy that would avoid sourcing from the DRC and covered countries altogether, but rather strives to source responsibly from this region. Voxx’s goal is to ultimately be able to certify that all of its products are manufactured with conflict free minerals. Voxx’s Conflict Minerals Policy statement can be found here: [VOXX International : Sustainability \(voxxintl.com\)](https://www.voxxintl.com/sustainability).

All employees who are members of the Company’s Conflict Minerals Process Organization (as defined in section 1.B. of the Due Diligence portion of the report) are required to review the Company’s policy on conflict minerals and the relevant due diligence process. The Process Administrator and Conflict Minerals Champions (as defined within Establish Strong Company Management Systems in the Due Diligence Design section) are responsible for ensuring that the related materials are appropriately communicated to organization members and key employees involved in the Company’s supply chain management.

Suppliers are encouraged to support industry efforts to enhance traceability and responsible practices in global mineral supply chains. The Company provides consultation and reference materials to all suppliers, as requested, to aid them in understanding our conflict mineral process and due diligence plan and in developing their own policies toward preventing the use of conflict minerals or derivative metals sourced from mines controlled by armed groups in the Conflict Region.

Reasonable Country of Origin Inquiry

As required by the Conflict Minerals Rule, we conducted a “reasonable country of origin inquiry” covering 2020. Voxx utilizes Conflict Minerals software and services provided by its External Conflict Minerals Advisor to conduct its reasonable country of origin inquiry. Our outreach included communicating requests for the Responsible Minerals Initiative (“RMI”) (formerly CFSI) Conflict Minerals Reporting Template (“the CMRT”) to all Voxx’s direct suppliers.

Supplier Surveys: Our data source consisted of all Company purchases for the calendar year and we identify our population of suppliers based on these purchases and focused on all products sourced from these suppliers. We requested that all suppliers provide information to us regarding 3TG and smelters using the CMRT. The CMRT was developed to facilitate disclosure and communication of information regarding smelters and refiners that provide material to a manufacturer’s supply chain. It includes questions regarding a direct supplier’s conflict-free policy, its due diligence process, and information about its supply chain such as the names and locations of smelters and refiners as well as the origin of 3TG used by those facilities.

Our evaluation encompassed 100% of the raw materials we purchased in 2020 from third parties for which the Company has manufacturing oversight, in accordance with the Conflict Minerals Rule. For the purpose of the Reasonable Country of Origin Inquiry, Voxx continued to receive supply chain responses through May 24, 2021. Based on the process described above, Voxx received the following results from its Reasonable Country of Origin Inquiry:

	2020	2019	2018
<u>Initial Assessment and Survey</u>			
Total products surveyed in responses received	3,422	2,742	3,512
Response rate (products)	85%	82%	88%
<u>Supplier Responses</u>			
Products containing no Conflict Minerals in materials provided to Voxx	1,466	1,195	764
	43%	44%	22%
Products for which Conflict Minerals do not originate from DRC or adjoining countries	1,127	1,026	1,304
	33%	37%	37%
Products for which Conflict Minerals source is unknown	829	522	1,444
	24%	19%	41%

The Company has noted that supplier engagement was higher for the calendar year ended December 31, 2020, compared to the December 31, 2019 reporting year, but remains lower than the December 31, 2018 reporting year. The decline in response for the December 31, 2019 reporting year was attributed to the COVID-19 pandemic that began in late 2019 and spread globally in 2020 and has continued in 2021 as businesses in countries around the world continue to work toward returning to normal operations. The COVID-19 pandemic resulted in widespread disruptions in business continuity around the world and included quarantines, business closures, and supply chain disruptions, leaving many of the third parties we purchase from unable to respond to our inquiries or at a limited capacity and ability to do so during the December 31, 2019 reporting year. While we achieved an improved response rate for the December 31, 2020 reporting year, some of our suppliers continue to be impacted by the pandemic. Despite this fact, our supplier responses in 2020, 2019 and 2018 were significantly higher than they were when the Company began the process in 2013 with a response rate of 50%, and the number of unknown materials in our supplier responses has decreased as compared to our 2018 responses, which is a positive trend. As such, we believe we have compiled the most complete and accurate data for 2020, representing the minerals in our supply chain. Refer also to the Company's Reasonable Country of Origin Inquiry process for the steps taken by the Company in 2020 above.

Provided below is a link to Voxx's internet disclosure of this Conflict Minerals Report: <https://investors.voxxintl.com/financial-information/sec-filings>.

Through Supply Chain Solutions, Voxx has created and maintains a database of this information, with the assistance of its External Conflict Minerals Advisor, Verisk 3E ("3E"). A copy of the declared sources of material has been included as part of this filing in Appendix A. The declared sources represent a summary of all available information, which has been declared by our suppliers in response to the RCOI.

Verification of Supplier Responses: We utilize the CMRT developed by the RMI to identify smelters and refiners in our supply chain. The CMRT must be completed and signed by an appropriate supplier signatory and requires suppliers to provide information concerning the usage and source of 3TG in their components, parts, and products, as well as information concerning their related compliance efforts.

Each year, prior to administering the CMRT to our suppliers, 3E sends preliminary letters to each in-scope supplier to provide additional information about the CMRT that will be sent. Voxx also offers to its suppliers online training sessions, through 3E, in multiple languages, to assist the suppliers in their understanding and timely completion of the CMRT and to educate them regarding the relevant SEC requirements and Voxx's due diligence expectations.

Due Diligence Design

We have designed our due diligence measures relating to 3TG to conform with, in all material respects, the criteria set forth in the Organization for Economic Cooperation and Development's Due Diligence Guidance for Responsible Supply Chains of Mineral from Conflict-Affected and High-Risk Areas, including the Supplement on Tin, Tantalum and Tungsten and the Supplement on Gold (Second Edition 2013) (the "OECD Guidance"). The OECD Guidance establishes a five-step framework for due diligence as a basis for responsible global supply chain management of minerals from conflict-affected and high-risk areas. Due diligence is required for the 3TG found during our Reasonable Country of Origin Inquiry that may possibly be sourced from the covered countries, or for which the origin is unknown based on our RCOI. The goal of our due diligence is to mitigate the risk that trade of 3TG in our products directly or indirectly funds illicit armed groups in the covered countries. The numbered headings below conform to the headings used in the OECD Guidance for each of the five steps.

1. Establish Strong Company Management Systems

- A. **Policy** - As cited above, we have adopted a Conflict Minerals sourcing policy setting forth that the Company does not knowingly source metals that come from conflict mines in the Eastern provinces of the Democratic Republic of the Congo or adjoining countries (the "Conflict Region"). The Company strives to source responsibly from this region. Voxx's goal is to ultimately be able to certify that all of its products are manufactured with conflict free minerals. Voxx's Conflict Minerals Policy statement can be found at: <https://www.voxxintl.com/sustainability/>
- B. **Internal Management Systems to Support Supply Chain Due Diligence** - Voxx has created internal standard operating procedures ("SOPs") for its Conflict Minerals Process Organization ("the Organization"), which was established by the Company to lead the Company's conflict minerals evaluation and due diligence process. These SOPs provide a step-by-step process that each business unit, department, and employee must follow to generate and maintain the necessary information needed for Voxx's compliance with the Rule.

The Organization is structured to provide Company-wide involvement of key individuals who have an impact on product development, procurement, production, supplier evaluation, public relations, corporate and social responsibility, information technology, legal, and reporting. The members of the Organization are responsible for ensuring that the Company's due diligence process is properly executed, and all issues

identified during implementation or ongoing execution are appropriately addressed and resolved on a timely basis. The Organization includes:

- **Process Oversight** - VOXX International Corporation's Board of Directors
 - **Process Sponsor** - President and Chief Executive Officer, who sets the tone at the top and emphasizes the importance of maintaining compliance with the Company's established Conflict Minerals policy and due diligence process and improving supply chain management related to potential conflict minerals sources.
 - **Process Leader** - One of Voxx's Assistant Vice Presidents in the Accounting Department, who develops and oversees the Conflict Minerals due diligence process, ensures compliance with due diligence objectives, and oversees day to day coordination of efforts pertaining to the due diligence process between management, external advisors, and auditors.
 - **Process Administrator** - Responsible for administering and documenting day to day activities of the Conflict Minerals due diligence process, and coordinating efforts between management, external advisors, and auditors. This role is performed by one of the Company's administrative assistants.
 - **External Conflict Minerals Advisor** - Verisk 3E
 - **Conflict Minerals Steering Committee** - Representing a cross-section of the Company's organizational leadership, responsible for sustaining and driving the Conflict Minerals due diligence process, making decisions, and ensuring the evaluation process proceeds efficiently and effectively. The members of this committee include the Company's Senior Vice President and Chief Operating Officer, General Counsel, as well identified leads at Corporate headquarters and within the Company's subsidiaries at which the majority of products and materials containing conflict minerals reside, generally members of the Engineering Department.
 - **Corporate Compliance Team** - Responsible for monitoring the control environment related to, and management of, the external reporting process. Members of this team include the Manager of Financial Reporting and the Compliance Manager, who are responsible for the filing of SEC reports and the Company's SOX compliance, as well as members of the Accounting Department, who carry out the conflict minerals due diligence objectives.
 - **Conflict Minerals Champions** - Designated individuals at each of the Company's subsidiaries responsible for monitoring the functions in their respective processes, communicating with the Conflict Minerals Steering Committee about issues and changes within their processes, and
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communicating with local personnel on new developments or requirements of the Conflict Minerals evaluation.

- **Significant Subsidiaries and Process Owners** - Significant operating groups (and their respective owners/group leaders) identified by Company management that source or manufacture products containing minerals included on the Conflict Minerals list and requiring evaluation.

The Conflict Minerals Steering Committee, Corporate Compliance Team, and Conflict Minerals Champions are responsible for assisting the Process Owners in the development, documentation and implementation of the Company's procedures and the evaluation of potential conflict minerals procurement for its supply chain. All internal resources performing and/or assisting in the Conflict Minerals evaluation and due diligence are qualified to perform his/her respective duties in the evaluation and are trained on the systems used to carry out the Company's due diligence.

Voxx uses 3E's online database to maintain business records, including supplier responses, supplier corrective actions and risk mitigation processes. A report is generated from the database, at least annually, outlining the information gathered and the actual and potential risks identified in the supply chain risk assessment.

- C. Establish a System of Controls and Transparency Over Conflict Mineral Supply Chain - We use 3E's online database to track and evaluate supplier responses, which produces reports including red flags on suppliers currently providing conflict minerals and the metals contained in the product; items and related suppliers with one or more red flags; suppliers with insufficient responses; suppliers with anomalies in the due diligence process that need resolution; and suppliers who fail to respond. This report is used to prepare the Company's annual Conflict Minerals Report, as well as to plan for the subsequent years' due diligence efforts. The storage of these metrics is an important part of demonstrating transparency and in accordance with OECD guidance in Step 1 - C.5., is maintained for a minimum of five (5) years, which allows Voxx to show the long-term evolution and improvement of its program to its shareholders.
 - D. Strengthen Company Engagement with Suppliers - For the 2013, 2014 and 2015 Conflict Minerals reporting years, members of the Company's Conflict Minerals Process Organization traveled to the annual Consumer Electronics Show ("CES") in Las Vegas, Nevada, held each January, in order to conduct in-person meetings with several of the Company's top suppliers to discuss the Company's conflict mineral initiatives and provide additional information and answer inquiries related to the CMRT administered. The meetings were arranged by Voxx's Process Administrator, based on information obtained and supplied by
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the Company's engineers, Purchasing Department, and project managers, through their ongoing communication with the suppliers throughout the year. These meetings provided the Company with the opportunity to engage with suppliers and direct them to information and training resources to attempt to increase the response rate and improve the content of the supplier survey responses. During 2015, the Company and representatives from 3E met with several suppliers to review previous submissions of the CMRT and discuss how to properly complete the template. Many suppliers had not provided the necessary level of detail in prior years and the Company specifically arranged time with these suppliers to address their questions and clearly express the Company's expectations. Going forward, The Company intends to hold these meetings periodically, as deemed necessary, in order to maintain its relationships with vendors that have been developed in prior years, as we believe the ability to meet with these suppliers in person improves the due diligence process.

The Company strives to maintain positive long-term relationships with all of its suppliers while remaining cost competitive in the market and upholding established quality standards. Whenever possible, the Company will leverage its long-term relationships to influence its suppliers to support conflict minerals initiatives and enable the Company to continue to responsibly source from them.

2. **Identify and Assess Risk in the Supply Chain**

- A. **Identify Smelters/Refiners in Supply Chain** - The Company's consultant, 3E, has created and maintains for Voxx, a supplier database to facilitate supply chain inquiries and control the documentation of due diligence performed related to potential conflict minerals within its supply chain. The supplier database is maintained within a software tool, Supply Chain Solutions, provided to the Company by 3E. 3E ensures the security of supplier information and that responsible Organization members have been granted access to enter and maintain products and suppliers within the database and execute supplier inquiries. The Company reports on all conflict mineral related products each year. In order to accomplish this, the suppliers of each item on the active item lists provided by the operating groups are identified. After the initial assessment is complete, suppliers providing conflict mineral related items are clearly identified in the Supplier Database.

We request all of our suppliers to complete the CMRT to determine the mines or locations of origin of 3TG in our supply chain. Additionally, we request that suppliers provide us with smelter IDs, as applicable, related to the smelters they source from. We use the data collected to compare to a validated smelter list to help us decide how we wish to conduct business with these suppliers going forward.

- B. Risk Assessment Scope – The Process Leader and members of the Corporate Compliance team meet with advisors from 3E at least bi-weekly after CMRTs are sent to the suppliers in order to discuss the status of due diligence efforts, as well as to improve efforts to obtain information on country of origin of the minerals and to mitigate red flags.

Each year, subsequent to the filing of our Conflict Minerals Report, our advisors from 3E conduct a “lessons learned” meeting with the Process Leader and the Corporate Compliance Team to discuss how best to focus our efforts on non-responsive vendors for the following reporting year in order to continue our efforts to improve vendor responses.

- C. Assess Due Diligence - Responses to the CMRT must contain all required data in the format corresponding to the survey. If responses are incomplete or inconsistent, the supplier is contacted and asked for missing or supplemental data. This is initially done by 3E via emails sent to the suppliers and followed up by telephone contact. After unsuccessful attempts at contact by 3E, the supplier and CMRT information in question will be referred to the Corporate Compliance team as ‘non-responsive,’ where additional attempts to contact the supplier via email or phone are made by the team to obtain the required information and reiterate the Company’s expectations of compliance.

Product information provided in the CMRT responses are compared to the Company’s purchasing records for the suppliers to ensure it supports the supplier’s disclosure (i.e., products included on the CMRT match products listed in supplier’s response). Some suppliers provide a ‘company level response,’ which is a disclosure of all the metals and smelters the supplier uses in every product it sells. When a company level response is received, 3E and the Corporate Compliance Team review the information and materials listed, as compared to the Company’s purchasing records.

Smelter information provided in the CMRT is compared to the CFSI Conflict Free Smelter (“CFS”) list at <http://www.responsiblemineralsinitiative.org/>. 3E compares supplier reported smelter information per the completed CMRT to the list on this site to validate whether the smelter is known and further determine its status with CFSI in the event it is known (i.e., Compliant, Active, In Progress, or none). 3E’s conflict mineral software provides reports broken down by “known” and “unknown” smelters for review by the Corporate Compliance team.

3. **Design and Implement a Strategy to Respond to Identified Risks**

We have procedures for monitoring and reporting on risk to designated senior management, the Audit Committee and Board of Directors. Pursuant to these procedures, the findings of our compliance efforts are reported to senior management of the Company, as well as to the Company's Board of Directors and Audit Committee.

4. **Carry Out Independent Third-Party Audit of Supply Chain Due Diligence at Identified Points in the Supply Chain**

In connection with our due diligence, we utilize information made available by the CFSI concerning third party audits of smelters and refiners to determine whether the smelter or refiner has obtained a conflict free certification and remains in compliance.

5. **Report on Supply Chain Due Diligence**

We file a Form SD, and to the extent applicable, a Conflict Mineral Report, with the Securities and Exchange Commission and make them available on our website.

Due Diligence Execution

1. We sent requests to all of our suppliers identified for 2020 who we believe sold us products containing 3TG. We requested that they complete a CMRT and provide us with smelter ID's, as applicable, related to the smelters they source from. We (3E, followed by the Corporate Compliance team) followed up via email and phone with suppliers who did not provide a response or provided an incomplete CMRT within the specified time frame communicated to the suppliers.
 2. We compared product information provided in the CMRT responses to our purchasing records for the suppliers to ensure it supports the supplier's disclosure (i.e., products included on the CMRT match products listed in supplier's response). Any inconsistencies in information resulted in follow up emails or phone calls to the supplier to clarify the CMRT responses.
 3. We reviewed the smelter information provided by suppliers in the CMRT and compared the information against the CFS list.
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4. The findings of our compliance efforts with respect to the calendar year ended December 31, 2020 were reported to senior management of the Company, as well as to the Board of Directors and Audit Committee.

Future steps to be taken to improve due diligence and risk mitigation

We intend to take the following steps to improve the due diligence conducted to further mitigate the risk that the conflict minerals in our products finance or benefit armed groups in the DRC:

- Continue to engage suppliers to obtain current, accurate and complete information about the supply chain.
- Continue to focus efforts to determine the source of components that the Company identified as not being conflict free or that had unknown results with the goal to reduce the number of unknown materials in the products our suppliers sell to us.
- Work through the CFSI to expand the smelters and refiners participating in the CFS Program.
- Engage any suppliers, if found to be providing us with components or materials containing conflict minerals from sources that support conflict in the DRC, to establish an alternative source of conflict minerals that does not support such conflict.
- Work with the OECD and relevant trade associations to define and improve best practices and encourage responsible sourcing of conflict minerals.

Based on the information provided by Voxx's suppliers utilized during 2020, the Company believes that the facilities that may have been used to process 3TG's in our products include the smelters and refiners listed in Appendix A below. The supplier responses included Known and Unknown smelters, but based on the absence of reliable information on the Unknown smelters, only the Known smelters have been included in Appendix A.

Appendix A

Smelter Name	Smelter Country	Compliant Refiner Location	Gold	Tantalum	Tin	Tungsten
8853 S.p.A.	ITA	Pero, Lombardia	X			
A.L.M.T. Corp.	JPN	Toyama City, Toyama				X
Abington Reldan Metals, LLC	USA	Pennsylvania, United States	X			
ACL Metais Eireli	BRA	Araçariguama, São Paulo				X

Advanced Chemical Company	USA	Warwick, Rhode Island	X			
Aida Chemical Industries Co., Ltd.	JPN	Fuchu, Tokyo	X			
Aktyubinsk Copper Company TOO	KAZ	Aktobe	X			
Al Etihad Gold Refinery DMCC	ARE	Dubai, Dubayy	X			
Albasteel Industria e Comercio de Ligas Para Fundicao Ltd.	BRA	Sao Paulo, São Paulo				X
Alexy Metals	USA	Mentor, Ohio	X			
Allgemeine Gold-und Silberscheideanstalt A.G.	DEU	Pforzheim, Baden-Württemberg	X			
Almalyk Mining and Metallurgical Complex (AMMC)	UZB	Almalyk, Toshkent	X			
Alpha	USA	Altoona, Pennsylvania			X	
AMG Brasil	BRA	São João del Rei, Minas Gerais		X		
An Thai Minerals Co., Ltd.	VNM	Quy Hop, Nghe An			X	
An Vinh Joint Stock Mineral Processing Company	VNM	Quy Hop, Nghe An			X	
AngloGold Ashanti Corrego do Sitio Mineracao	BRA	Nova Lima, Minas Gerais	X			
Argor-Heraeus S.A.	CHE	Mendrisio, Ticino	X			
Artek LLC	RUS	Moscow, Moskva				X
Asahi Pretec Corp.	JPN	Kobe, Hyogo, Japan	X			
Asahi Refining Canada Ltd.	CAN	Brampton, Ontario	X			
Asahi Refining USA Inc.	USA	Salt Lake City, Utah	X			
Asaka Riken Co., Ltd.	JPN	Tamura, Fukushima	X	X		
Asia Tungsten Products Vietnam Ltd.	VNM	Vinh Bao District, Hai Phong				X
Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	TUR	Istanbul, Istanbul Province	X			
AU Traders and Refiners	ZAF	Johannesburg, Gauteng	X			

Augmont Enterprises Private Limited	IND	Mumbai, Maharashtra	X			
AURA-II	USA	Milwaukee, Wisconsin	X			
Aurubis AG	DEU	Hamburg, Hamburg	X			
Bangalore Refinery	IND	Bangalore, Karnataka	X			
Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHL	Quezon City, Rizal	X			
Bauer Walser AG	DEU		X			
Boliden AB	SWE	Skelleftehamn, Västerbottens län [SE-24]	X			
C. Hafner GmbH + Co. KG	DEU	Pforzheim, Baden-Württemberg	X			
C.I Metales Procesados Industriales SAS	COL	Cota, Cundinamarca	X			
Caridad	MEX		X			
CCR Refinery - Glencore Canada Corporation	CAN	Montréal, Quebec	X			
Cendres + Metaux S.A.	CHE	Biel-Bienne, Bern	X			
Changsha South Tantalum Niobium Co., Ltd.	CHN	Changsha, Hunan Sheng		X		
Chenzhou Diamond Tungsten Products Co., Ltd.	CHN	Chenzhou, Hunan Sheng				X
Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CHN	Chenzhou, Hunan Sheng			X	
Chifeng Dajingzi Tin Industry Co., Ltd.	CHN	Chifeng, Nei Mongol Zizhiqu			X	
Chimet S.p.A.	ITA	Arezzo, Toscana	X			
China Minmetals Nonferrous Metals Co Ltd	CHN					X
China Molybdenum Tungsten Co., Ltd.	CHN	Luoyang, Hunan Sheng				X
China National Gold Group Corporation	CHN		X			
China Tin Group Co., Ltd.	CHN	Laibin, Guangxi Zhuangzu Zizhiqu			X	
Chongyi Zhangyuan Tungsten Co., Ltd.	CHN	Ganzhou, Jiangxi Sheng				X

Chugai Mining	JPN	Chiyoda, Tokyo	X			
CNMC (Guangxi) PGMA Co. Ltd.	CHN				X	
Codelco	CHL		X			
Cooperativa Metalurgica de Rondônia Ltda.	BRA	Ariquemes, Rondonia			X	
CP Metals Inc.	USA	Warren, Ohio		X		X
CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda	BRA	São José, Santa Catarina			X	
CRM Synergies	ESP	Toledo, Toledo			X	
Cronimet Brasil Ltda	BRA	Araquari, Santa Catarina				X
CV Ayi Jaya	IDN	Sungailiat, Kepulauan Bangka Belitung			X	
CV Dua Sekawan	IDN	Pangkal Pinang, Kepulauan Bangka Belitung			X	
CV Gita Pesona	IDN	Sungailiat, Kepulauan Bangka Belitung			X	
CV Justindo	IDN	Kabupaten, Bangka			X	
CV Makmur Jaya	IDN				X	
CV United Smelting	IDN	Pangkal Pinang, Kepulauan Bangka Belitung			X	
CV Venus Inti Perkasa	IDN	Pangkal Pinang, Kepulauan Bangka Belitung			X	
D Block Metals, LLC	USA	Gastonia, North Carolina		X		
Da Nang Processing Import and Export Joint Stock	VNM	Hai Duong			X	
Daejin Indus Co., Ltd.	KOR	Namdong, Incheon-gwangyeoksi	X			
DaeryongENC	KOR		X			
Daye Non-Ferrous Metals Mining Ltd.	CHN		X			
Dayu Jincheng Tungsten Industry Co., Ltd.	CHN	Dayu Country, Jiangxi				X

Dayu Weiliang Tungsten Co., Ltd.	CHN	Nan'an, Dayu, Ganzhou, Jiangxi				X
Degussa Sonne / Mond Goldhandel GmbH	DEU	Pforzheim, Baden-Württemberg	X			
DODUCO Contacts and Refining GmbH	DEU	Pforzheim, Baden-Württemberg	X			
Dongguan CiEXPO Environmental Engineering Co., Ltd.	CHN	Dongguan, Guangdong Sheng			X	
Dowa	JPN	Kosaka, Akita	X		X	
DSC (Do Sung Corporation)	KOR	Gimpo, Gyeonggi-do	X			
Duoluoshan	CHN	Sihui City, Guangdong		X		
E.S.R. Electronics	USA	Houston, Texas		X		
Eco-System Recycling Co., Ltd. East Plant	JPN	Honjo, Saitama	X			
Eco-System Recycling Co., Ltd. North Plant	JPN	Kazuno, Akita	X			
Eco-System Recycling Co., Ltd. West Plant	JPN	Okayama, Okayama	X			
Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company	VNM	Tinh Tuc, Cao Bằng			X	
Elemental Refining, LLC	USA	Jackson, Ohio	X			
EM Vinto	BOL	Oruro, Oruro			X	
Emirates Gold DMCC	ARE	Dubai, Dubayy	X			
Estanho de Rondonia S.A.	BRA				X	
Exotech Inc.	USA	Pompano Beach, Florida		X		
F&X Electro-Materials Ltd.	CHN	Jiangmen, Guangdong Sheng		X		
Faggie Enrico S.p.A.	ITA	Sesto Fiorentino, Florence	X			
Feinhütte Halsbrücke GmbH	DEU				X	
Fenix Metals	POL	Chmielów, Podkarpackie			X	
Fidelity Printers and Refiners Ltd.	ZWE		X			
FIR Metals & Resource Ltd.	CHN	Zhuzhou, Hunan Sheng		X		
Fujian Ganmin RareMetal Co., Ltd.	CHN	Longyan, Fujian Sheng				X

Fujian Jinxin Tungsten Co., Ltd.	CHN	Yanshi, Longyan, Fujian Sheng				X
Ganxian Shirui New Material Co., Ltd.	CHN					X
Ganzhou Grand Sea W & Mo Group Co Ltd	CHN					X
Ganzhou Haichuang Tungsten Co., Ltd.	CHN	Ganzhou, Jiangxi Sheng				X
Ganzhou Huaxing Tungsten Products Co., Ltd.	CHN	Ganzhou, Jiangxi Sheng				X
Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHN	Ganzhou, Jiangxi Sheng				X
Ganzhou Non-ferrous Metals Smelting Co., Ltd.	CHN	Ganzhou, Jiangxi				X
Ganzhou Seadragon W & Mo Co., Ltd.	CHN	Ganzhou, Jiangxi Sheng				X
Ganzhou Yatai Tungsten Co., Ltd.	CHN	Ganzhou, Jiangxi				X
Geib Refining Corporation	USA	Warwick, Rhode Island	X			
Gejiu Fengming Metallurgy Chemical Plant	CHN	Gejiu, Yunnan Sheng			X	
Gejiu Jinye Mineral Company	CHN	Gejiu, Yunnan			X	
Gejiu Kai Meng Industry and Trade LLC	CHN	Gejiu, Yunnan Sheng			X	
Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHN	Gejiu, Yunnan Sheng			X	
Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	CHN	Gejiu, Yunnan Sheng			X	
Gejiu Zili Mining And Metallurgy Co., Ltd.	CHN	Gejiu, Yunnan Sheng			X	
Global Advanced Metals	USA	a. Aizuwakamatsu, Fukushima, Japan; b. Boyertown, Pennsylvania, USA			X	
Global Advanced Metals Aizu	JPN	Aizuwakamatsu, Fukushima			X	
Global Advanced Metals Boyertown	USA	Boyertown, Pennsylvania			X	

Global Tungsten & Powders Corp.	USA	Towanda, Pennsylvania				X
Gold Bell Group	CHN				X	
Gold Refinery of Zijin Mining Group Co., Ltd.	CHN	Shanghang, Fujian Sheng	X			
Great Wall Precious Metals Co., Ltd. of CBPM	CHN		X			
Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CHN	Chaozhou, Guangdong Sheng			X	
Guangdong Jinding Gold Limited	CHN		X			
Guangdong Rising Rare Metals-EO Materials Ltd.	CHN	Yingde, Guangdong Sheng		X		
Guangdong Xianglu Tungsten Co., Ltd.	CHN	Chaozhou, Guangdong Sheng				X
Guanyang Guida Nonferrous Metal Smelting Plant	CHN	Guanyang, Guangxi Zhuangzu Zizhiqu			X	
Guizhou Zhenhua Xinyun Technology Ltd., Kaili branch	CHN	Kaili, Guizhou		X		
Gujarat Gold Centre	IND	Ahmedabad, Gujarat	X			
Guoda Safina High-Tech Environmental Refinery Co., Ltd.	CHN	Zhaoyuan, Shandong	X			
H.C. Starck GmbH Laufenburg	DEU	Laufenburg, Baden-Württemberg		X		
H.C. Starck Group	DEU	a. Newton, Massachusetts, USA; b. Goslar, Lower Saxony, Germany; c. Laufenburg, Baden-Württemberg, Germany; d. Hermsdorf, Thuringia, Germany; e. Mito, Ibaraki, Japan; f. Map Ta Phut, Rayong, Thailand		X		
H.C. Starck Hermsdorf GmbH	DEU	Hermsdorf, Thüringen		X		

H.C. Starck Inc.	USA	Newton, Massachusetts		X		
H.C. Starck Tungsten GmbH	DEU	Goslar, Niedersachsen				X
Hangzhou Fuchunjiang Smelting Co., Ltd.	CHN		X			
HC Starck Group GmbH	DEU	Ganzhou, China; Goslar, Germany; Laufenburg, Germany; Nui Phao, Vietnam				X
Heimerle + Meule GmbH	DEU	Pforzheim, Baden-Württemberg	X			
Hengyang King Xing Lifeng New Materials Co., Ltd.	CHN	Hengyang, Hunan Sheng		X		
Heraeus Germany GmbH Co. KG	DEU	Hanau, Hessen	X			
Heraeus Metals Hong Kong Ltd.	CHN	Fanling, Hong Kong SAR	X			
Hi-Temp Specialty Metals, Inc.	USA	Yaphank, New York		X		
HuiChang Hill Tin Industry Co., Ltd.	CHN	Ganzhou, Jiangxi Sheng			X	
Huichang Jinshunda Tin Co., Ltd.	CHN	Ganzhou, Jiangxi Sheng			X	
Hunan Chenzhou Mining Co., Ltd.	CHN	Yuanling, Hunan Sheng				X
Hunan Chenzhou Mining Group Co., Ltd.	CHN		X			
Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji	CHN	Hengyang, Hunan Sheng				X
Hunan Chuangda Vanadium Tungsten Co., Ltd. Yanglin	CHN	Hengyang, Hunan				X
Hunan Chunchang Nonferrous Metals Co., Ltd.	CHN	Hengyang, Hunan Sheng				X
Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd.	CHN		X			
Hunan Litian Tungsten Industry Co., Ltd.	CHN	Yiyang, Hunan Sheng				X
HwaSeong CJ Co. Ltd.	KOR		X			

Hydrometallurg, JSC	RUS	Nalchik, Kabardino-Balkarskaya Respublika				X
Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CHN	Hohhot, Nei Mongol Zizhiqu	X			
International Precious Metal Refiners	ARE	Dubai, Dubayy	X			
Ishifuku Metal Industry Co., Ltd.	JPN	Soka, Saitama	X			
Istanbul Gold Refinery	TUR	Kuyumcukent, İstanbul	X			
Italpreziosi	ITA	Arezzo, Toscana	X			
Japan Mint	JPN	Osaka, Osaka	X			
Japan New Metals Co., Ltd.	JPN	Akita City, Akita				X
Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHN	Ganzhou, Jiangxi Sheng				X
Jiangxi Copper Co., Ltd.	CHN	Guixi City, Jiangxi Sheng	X			
Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHN	Fengxin, Jiangxi Sheng		X		
Jiangxi Gan Bei Tungsten Co., Ltd.	CHN	Xiushui, Jiangxi Sheng				X
Jiangxi Ketai Advanced Material Co., Ltd.	CHN	Yichun, Jiangxi			X	
Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.	CHN					X
Jiangxi Nanshan	CHN				X	
Jiangxi New Nanshan Technology Ltd.	CHN	Ganzhou, Jiangxi Sheng			X	
Jiangxi Richsea New Materials Co., Ltd.	CHN					X
Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHN	Tonggu, Jiangxi Sheng				X
Jiangxi Tuohong New Raw Material	CHN	Yi Chun City, Jiangxi Sheng		X		
Jiangxi Xianglu Tungsten Co., Ltd.	CHN	Huanglong, Jiangxi Sheng				X
Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CHN	Ganzhou, Jiangxi Sheng				X

Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd.	CHN	Xiushui, Jiangxi				X
Jiangxi Yaosheng Tungsten Co., Ltd.	CHN	Ganzhou, Jiangxi Sheng				X
Jiujiang Janny New Material Co., Ltd.	CHN	Jiujiang, Jiangxi Sheng		X		
JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHN	Jiujiang, Jiangxi Sheng		X		
Jiujiang Tanbre Co., Ltd.	CHN	Jiujiang, Jiangxi Sheng		X		
Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHN	Jiujiang, Jiangxi Sheng		X		
JSC "Kirovgrad Hard Alloys Plant"	RUS	Kirovgrad, Sverdlovskaya oblast'				X
JSC Ekaterinburg Non-Ferrous Metal Processing Plant	RUS	Verkhnyaya Pyshma, Sverdlovsk	X			
JSC Novosibirsk Refinery	RUS	Novosibirsk, Novosibirskaya oblast'	X			
JSC Uralelectromed	RUS	Verkhnyaya Pyshma, Sverdlovskaya oblast'	X			
JX Nippon Mining & Metals Co., Ltd.	JPN	Ōita, Ōita	X			
Kaloti Precious Metals	ARE	Dubai	X			
Kazakhmys Smelting LLC	KAZ	Balkhash, Karaganda Region	X			
Kazzinc	KAZ	Ust-Kamenogorsk, Qaraghandy oblysy	X			
Kemet Blue Metal	USA			X		
KEMET Blue Powder	USA	Mound House, Nevada		X		
KEMET de Mexico	MEX	Matamoros, Tamaulipas		X		
Kennametal Fallon	USA	Fallon, Nevada				X
Kennametal Huntsville	USA	Huntsville, Alabama				X

Kennecott Utah Copper LLC	USA	Magna, Utah	X			
KGETS CO., LTD.	KOR	Siheung-si, Gyeonggi-do				X
KGHM Polska Miedz Spolka Akcyjna	POL	Lubin, Dolnośląskie	X			
King-Tan Tantalum Industry Ltd.	CHN	Yifeng, Jiangxi		X		
Kojima Chemicals Co., Ltd.	JPN	Sayama, Saitama	X			
Korea Metal Co. Ltd	KOR		X			
Korea Zinc Co., Ltd.	KOR	Gangnam, Seoul-teukbyeolsi	X			
Kyrgyzaltyn JSC	KGZ	Bishkek, Chüy	X			
Kyshtym Copper-Electrolytic Plant ZAO	RUS		X			
L' azurde Company For Jewelry	SAU		X			
Lianyou Metals Co., Ltd.	TWN	Fangliao, Pingtung				X
Lingbao Gold Co., Ltd.	CHN		X			
Lingbao Jinyuan Tonghui Refinery Co. Ltd.	CHN		X			
Linwu Xianggui Smelter Co	CHN				X	
L'Orfebvre S.A.	AND	Andorra la Vella, Andorra la Vella	X			
LS-NIKKO Copper Inc.	KOR	Onsan-eup, Ulsan-gwangyeoksi	X			
LT Metal Ltd.	KOR	Seo-gu, Incheon-gwangyeoksi	X			
Luna Smelter, Ltd.	RWA	Kigali, City of Kigali			X	
Luoyang Zijin Yinhui Metal Smelt Co Ltd	CHN		X			
Ma'anshan Weitai Tin Co., Ltd.	CHN	Maanshan, Anhui Sheng			X	
Magnu's Minerais Metais e Ligas Ltda.	BRA	São João Del Rei, Minas Gerais			X	
Malaysia Smelting Corporation (MSC)	MYS	Butterworth, Pulau Pinang			X	
Malipo Haiyu Tungsten Co., Ltd.	CHN	Nanfeng Xiaozhai, Yunnan Sheng				X
Marsam Metals	BRA	Sao Paulo, São Paulo	X			

Masan High-Tech Materials	VNM	Dai Tu, Thái Nguyên				X
Materion	USA	Buffalo, New York	X			
Matsuda Sangyo Co., Ltd.	JPN	Iruma, Saitama	X			
Melt Metais e Ligas S.A.	BRA	Ariquemes, Rondônia			X	
Meta Materials	MKD	Balin Dol, Gostivar		X		
Metahub Industries Sdn. Bhd.	MYS		X		X	
Metal Concentrators SA (Pty) Ltd.	ZAF	Kempton Park, Gauteng	X			
Metallic Resources, Inc.	USA	Twinsburg, Ohio			X	
Metallix Refining Inc.	USA	Greenville, North Carolina	X			
Metallo Belgium N.V.	BEL	Beerse, Antwerpen			X	
Metallo Chimique	BEL				X	
Metallo Spain S.L.U.	ESP	Berango, Bizkaia			X	
Metallurgical Products India Pvt., Ltd.	IND	District Raigad, Maharashtra		X		
Metalor Technologies (Hong Kong) Ltd.	CHN	Kwai Chung, Hong Kong SAR	X			
Metalor Technologies (Singapore) Pte., Ltd.	SGP	Singapore, South West	X			
Metalor Technologies (Suzhou) Ltd.	CHN	Suzhou Industrial Park, Jiangsu Sheng	X			
Metalor Technologies S.A.	CHE	Marin, Neuchâtel	X			
Metalor USA Refining Corporation	USA	North Attleboro, Massachusetts	X			
Metalurgica Met-Mex Penoles S.A. De C.V.	MEX	Torreón, Coahuila de Zaragoza	X			
Mineracao Taboca S.A.	BRA	Presidente Figueiredo, Amazonas		X	X	
Minmetals Ganzhou Tin Co. Ltd.	CHN				X	
Minsur	PER	Paracas, Ika			X	
Mitsubishi Materials Corporation	JPN	Tokyo, Tokyo	X		X	
Mitsui Mining and Smelting Co., Ltd.	JPN	Takehara, Hiroshima	X	X		

MMTC-PAMP India Pvt., Ltd.	IND	Mewat, Haryana	X			
Modeltech Sdn Bhd	MYS	Melaka, Malaysia	X		X	
Moliren Ltd.	RUS	Roshal, Moskovskaja oblast'				X
Morris and Watson	NZL	Onehunga, Auckland	X			
Morris and Watson Gold Coast	AUS	Gold Coast, Queensland	X			
Moscow Special Alloys Processing Plant	RUS	Obrucheva, Moskva	X			
Nadir Metal Rafineri San. Ve Tic. A.S.	TUR	Bahçelievler, İstanbul	X			
Navoi Mining and Metallurgical Combinat	UZB	Navoi, Navoiy	X			
Nghe Tinh Non-Ferrous Metals Joint Stock Company	VNM	Quy Hop, Quy Hop, Nghe An			X	
NH Recytech Company	KOR	Pyeongtaek-si, Gyeonggi-do	X			
Niagara Refining LLC	USA	Depew, New York				X
Nihon Material Co., Ltd.	JPN	Noda, Chiba	X			
Ningxia Orient Tantalum Industry Co., Ltd.	CHN	Shizuishan City, Ningxia Huizi Zizhiqu		X		
Novosibirsk Processing Plant Ltd.	RUS				X	
NPM Silmet AS	EST	Sillamäe, Ida-Virumaa		X		
NPP Tyazhmetprom LLC	RUS	Kopeysk, Chelyabinskaya Oblast'				X
O.M. Manufacturing (Thailand) Co., Ltd.	THA	Sriracha, Chon Buri			X	
O.M. Manufacturing Philippines, Inc.	PHL	Rosario, Cavite			X	
Ogussa Österreichische Gold- und Silber-Scheideanstalt GmbH	AUT	Vienna, Wien	X			
Ohura Precious Metal Industry Co., Ltd.	JPN	Nara-shi, Nara	X			
OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	RUS	Krasnoyarsk, Krasnoyarskiy kray	X			

OJSC Kolyma Refinery	RUS		X			
Operaciones Metalurgicas S.A.	BOL	Oruro, Oruro			X	
PAMP S.A.	CHE	Castel San Pietro, Ticino	X			
Pease & Curren	USA	Warwick, Rhode Island	X			
Penglai Penggang Gold Industry Co Ltd	CHN		X			
Philippine Chuangxin Industrial Co., Inc.	PHL	Marilao, Bulacan				X
Phoenix Metal Ltd.	RWA	Jabana, Gasabo, Kigali			X	
Plansee	AUT	a. Reutte, Tyrol, Austria; b. Liezen, Styria, Austria		X		
Plansee SE Liezen	AUT	Liezen, Styria		X		
Plansee SE Reutte	AUT	Reutte, Tyrol		X		
Planta Recuperadora de Metales SpA	CHL	Mejillones, Antofagasta	X			
Pobedit, JSC	RUS	Vladikavkaz, Republic of North Ossetia-Alania				X
Pongpipat Company Limited	MMR	Yangon			X	
Precious Minerals and Smelting Limited	IND	Jagdapur, Chhattisgarh			X	
Prioksky Plant of Non-Ferrous Metals	RUS	Kasimov, Ryazanskaya oblast'	X			
PT Alam Lestari Kencana	IDN				X	
PT Aneka Tambang (Persero) Tbk	IDN	Jakarta, Jakarta Raya	X			
PT Aries Kencana Sejahtera	IDN	Pemali, Kepulauan Bangka Belitung			X	
PT Artha Cipta Langgeng	IDN	Sungailiat, Kepulauan Bangka Belitung			X	
PT ATD Makmur Mandiri Jaya	IDN	Sungailiat, Kepulauan Bangka Belitung			X	
PT Babel Inti Perkasa	IDN	Lintang, Kepulauan Bangka Belitung			X	

PT Babel Surya Alam Lestari	IDN	Badau, Kepulauan Bangka Belitung				X	
PT Bangka Kudai Tin	IDN					X	
PT Bangka Prima Tin	IDN	Pangkalan Baru, Kepulauan Bangka Belitung				X	
PT Bangka Putra Karya	IDN	a. Pangkal Pinang, Bangka, Indonesia				X	
PT Bangka Serumpun	IDN	Pangkalpinang, Kepulauan Bangka Belitung				X	
PT Bangka Timah Utama Sejahtera	IDN					X	
PT Bangka Tin Industry	IDN	Sungailiat, Kepulauan Bangka Belitung				X	
PT Belitung Industri Sejahtera	IDN	West Belitung, Kepulauan Bangka Belitung				X	
PT BilliTin Makmur Lestari	IDN	Sungailiat, Bangka				X	
PT Bukit Timah	IDN	Pangkal Pinang, Kepulauan Bangka Belitung				X	
PT Cipta Persada Mulia	IDN	Riau, Bangka				X	
PT DS Jaya Abadi	IDN	Pangkal Pinang, Kepulauan Bangka Belitung				X	
PT Eunindo Usaha Mandiri	IDN	Karimun, Kepulauan Riau				X	
PT Fang Di MulTindo	IDN					X	
PT Hanjaya Perkasa Metals	IDN					X	
PT HP Metals Indonesia	IDN					X	
PT Inti Stania Prima	IDN	Sungailiat, Kepulauan Bangka Belitung				X	
PT Karimun Mining	IDN	Karimun, Kepulauan Riau				X	
PT Kijang Jaya Mandiri	IDN	Sungailiat, Kepulauan Bangka Belitung				X	
PT Koba Tin	IDN					X	

PT Lautan Harmonis Sejahtera	IDN	Pasir Putih, Kepulauan Bangka Belitung				X	
PT Menara Cipta Mulia	IDN	Mentawak, Kepulauan Bangka Belitung				X	
PT Mitra Stania Prima	IDN	Sungailiat, Kepulauan Bangka Belitung				X	
PT O.M. Indonesia	IDN	Bekasi, Jawa Barat				X	
PT Panca Mega Persada	IDN	Sungailiat, Kepulauan Bangka Belitung				X	
PT Premium Tin Indonesia	IDN	Pangkalan, Central Kalimantan				X	
PT Prima Timah Utama	IDN	Pangkal Pinang, Kepulauan Bangka Belitung				X	
PT Rajawali Rimba Perkasa	IDN	Tukak Sadai, Bangka Belitung				X	
PT Rajehan Ariq	IDN	Pangkal Pinang, Kepulauan Bangka Belitung				X	
PT Refined Bangka Tin	IDN	Sungailiat, Kepulauan Bangka Belitung				X	
PT Sariwiguna Binasentosa	IDN	Pangkal Pinang, Kepulauan Bangka Belitung				X	
PT Seirama Tin investment	IDN					X	
PT Singkep Times Utama	IDN					X	
PT Stanindo Inti Perkasa	IDN	Pangkal Pinang, Kepulauan Bangka Belitung				X	
PT Sukses Inti Makmur	IDN	Sungai Samak, Kepulauan Bangka Belitung				X	
PT Sumber Jaya Indah	IDN	Pangkal Pinang, Kepulauan Bangka Belitung				X	
PT Supra Sukses Trinusa	IDN					X	
PT Timah Nusantara	IDN	Tempilang, Kepulauan Bangka Belitung				X	

PT Timah Tbk Kundur	IDN	Kundur, Riau			X	
PT Timah Tbk Mentok	IDN	Mentok, Kepulauan Bangka Belitung			X	
PT Tinindo Inter Nusa	IDN	Pangkal Pinang, Kepulauan Bangka Belitung			X	
PT Tirus Putra Mandiri	IDN	Bogor, Jawa Barat			X	
PT Tommy Utama	IDN	Gantung, Kepulauan Bangka Belitung			X	
PT Wahana Perkit Jaya	IDN	Topang Island, Riau Province			X	
PT Yinchendo Mining Industry	IDN				X	
PX Precinox S.A.	CHE	La Chaux-de-Fonds, Neuchâtel	X			
QG Refining, LLC	USA	Fairfield, Ohio	X			
QuantumClean	USA	Carrollton, Texas		X		
Rand Refinery (Pty) Ltd.	ZAF	Germiston, Gauteng	X			
Refinery of Seemine Gold Co., Ltd.	CHN		X			
REMONDIS PMR B.V.	NLD	Moerdijk, Noord-Brabant	X			
Republic Metals Corporation	USA	Miami, Florida	X			
Resind Industria e Comercio Ltda.	BRA	São João del Rei, Minas Gerais		X	X	
Royal Canadian Mint	CAN	Ottawa, Ontario	X			
Rui Da Hung	TWN	Taoyuan, Taoyuan			X	
SAAMP	FRA	Paris, Île-de-France	X			
Sabin Metal Corp.	USA		X			
Safimet S.p.A	ITA	Arezzo, Toscana	X			
SAFINA A.S.	CZE	Vestec, Praha-západ	X			
Sai Refinery	IND	Parwanoo, Himachal Pradesh	X			
Samduck Precious Metals	KOR	Namdong, Incheon-gwangyeoksi	X			
Samwon Metals Corp.	KOR		X			
Sanher Tungsten Vietnam Co., Ltd.	VNM	Huyen Nhon Trach, Tinh Dong Nai				X

SAXONIA Edelmetalle GmbH	DEU	Halsbruke, Sachsen	X			
Schone Edelmetaal B.V.	NLD	Amsterdam, North Holland	X			
SEMPSA Joyeria Plateria S.A.	ESP	Madrid, Madrid, Comunidad de	X			
Shandong Gold Smelting Co., Ltd.	CHN	Laizhou, Shandong Sheng	X			
Shandong Tiancheng Biological Gold Industrial Co., Ltd.	CHN	Laizhou, Yantai	X			
Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CHN	Zhaoyuan, Shandong Sheng	X			
Shanghai Jiangxi Metals Co., Ltd.	CHN			X		
Sichuan Tianze Precious Metals Co., Ltd.	CHN	Chengdu, Sichuan Sheng	X			
Singway Technology Co., Ltd.	TWN	Dayuan, Taoyuan	X			
So Accurate Group, Inc.	USA		X			
SOE Shyolkovsky Factory of Secondary Precious Metals	RUS	Shyolkovo, Moskovskaja oblast'	X			
Soft Metais Ltda.	BRA	Bebedouro, São Paulo			X	
Solar Applied Materials Technology Corp.	TWN	Tainan City, Tainan	X			
Solikamsk Magnesium Works OAO	RUS	Solikamsk, Permskiy kray		X		
South-East Nonferrous Metal Company Limited of Hengyang City	CHN	Hengyang, Hunan				X
Sudan Gold Refinery	SDN	Khartoum	X			
Sumitomo Metal Mining Co., Ltd.	JPN	Saijo, Wehime	X			
SungEel HiMetal Co., Ltd.	KOR	Gunsan-si, Jeollabuk-do	X			
Super Ligas	BRA	Piracicaba, São Paulo			X	
Suzhou Xingrui Noble	CHN		X			
T.C.A S.p.A	ITA	Capolona, Toscana	X			
Taki Chemical Co., Ltd.	JPN	Harima, Hyogo		X		
Tanaka Kikinzoku Kogyo K.K.	JPN	Hiratsuka, Kanagawa	X			

TANIOBIS Co., Ltd.	THA	Map Ta Phut, Rayong		X		
TANIOBIS GmbH	DEU	Goslar, Niedersachsen		X		
TANIOBIS Japan Co., Ltd.	JPN	Mito, Ibaraki		X		
TANIOBIS Smelting GmbH & Co. KG	DEU	Laufenburg, Baden-Württemberg		X		X
Tantalite Resources	ZAF			X		
Tejing (Vietnam) Tungsten Co., Ltd.	VNM	Halong City, Tây Ninh				X
Telex Metals	USA	Croydon, Pennsylvania		X		
Thai Nguyen Mining and Metallurgy Co., Ltd.	VNM	Thai Nguyen, Thái Nguyên			X	
Thaisarco	THA	Amphur Muang, Phuket			X	
Tin Technology & Refining	USA	West Chester, Pennsylvania			X	
Tokuriki Honten Co., Ltd.	JPN	Kuki, Saitama	X			
Tongling nonferrous Metals Group Co.,Ltd	CHN		X			
Tony Goetz NV	BEL	Antwerp, Antwerp	X			
TOO Tau-Ken-Altyn	KAZ	Astana, Almaty	X			
Torecom	KOR	Asan, Chungcheongnam-do	X			
Tranzact, Inc.	USA	Lancaster, Pennsylvania		X		
TSK Pretech	KOR	Chopyeong-myeon, Chungcheongbuk-do	X			
Tuyen Quang Non-Ferrous Metals Joint Stock Company	VNM	Tan Quang, Tuyen Quang, Tuyen Quang			X	
Ulba Metallurgical Plant JSC	KAZ	Ust-Kamenogorsk, Qaraghandy oblysy		X		
Umicore Brasil Ltda.	BRA	Guarulhos, São Paulo	X			
Umicore Precious Metals Thailand	THA	Khwaeng Dok Mai, Krung Thep Maha Nakhon	X			

Umicore S.A. Business Unit Precious Metals Refining	BEL	Hoboken, Antwerpen	X			
Unecha Refractory metals plant	RUS	Unecha, Bryanskaya oblast'				X
United Precious Metal Refining, Inc.	USA	Alden, New York	X			
Universal Precious Metals Refining Zambia	ZMB	Lusaka, Lusaka Province	X			
Valcambi S.A.	CHE	Balerna, Ticino	X			
Vietnam Youngsun Tungsten Industry Co., Ltd	VNM	Halong City, Quang Ninh				X
VQB Mineral and Trading Group JSC	VNM	Hanoi, Ha Noi			X	
Western Australian Mint (T/a The Perth Mint)	AUS	Newburn, Western Australia	X			
White Solder Metalurgia e Mineracao Ltda.	BRA	Ariquemes, Rondônia			X	
WIELAND Edelmetalle GmbH	DEU	Pforzeim, Baden-Wurtemberg	X			
Wolfram Bergbau und Hutten AG	AUT	St. Martin i-S, Steiermark				X
Wolfram Company CJSC	RUS	Nalchik, Kabardino-Balkaria Republic, Russia				X
Woltech Korea Co., Ltd.	KOR	Gyeongju-si, Gyeongsangbuk-do				X
Xiamen Tungsten (H.C.) Co., Ltd.	CHN	Xiamen, Fujian Sheng				X
Xiamen Tungsten Co., Ltd.	CHN	Xiamen, Fujian Sheng				X
XIMEI RESOURCES (GUANGDONG) LIMITED	CHN	Yingde, Guangdong Sheng		X		
Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.	CHN	Ganzhou, Jiangxi Sheng				X
Xinhai Rendan Shaoguan Tungsten Co., Ltd.	CHN	Shaoguan, Guangdong Sheng				X
XinXing HaoRong Electronic Material Co., Ltd.	CHN	YunFu City, Guangdong Sheng		X		
Yamakin Co., Ltd.	JPN	Konan, Kochi	X			

Yanling Jincheng Tantalum & Niobium Co., Ltd.	CHN	Zhuzhou, Hunan Sheng		X		
Yichun Jin Yang Rare Metal Co., Ltd.	CHN	Yichun, Jiangxi		X		
Yokohama Metal Co., Ltd.	JPN	Sagamihara, Kanagawa	X			
Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHN	Gejiu, Yunnan Sheng			X	
Yunnan Copper Industry Co Ltd	CHN		X			
Yunnan Tin Company Limited	CHN	Gejiu, Yunnan Sheng			X	
Yunnan Yunfan Non-ferrous Metals Co., Ltd.	CHN	Gejiu, Yunnan Sheng			X	
Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHN	Sanmenxia, Henan Sheng	X			
Zhuzhou Cemented Carbide Group Co Ltd	CHN					X
Zhuzhou Cemented Carbide Group Co., Ltd.	CHN	Zhuzhou, Hunan		X		
