

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

FORM SD  
SPECIALIZED DISCLOSURE REPORT

**ReWalk Robotics Ltd.**

(Exact name of registrant as specified in its charter)

State of Israel  
(State or other jurisdiction of  
incorporation or organization)

001-36612  
(Commission file number)

Not applicable  
(IRS Employer Identification No.)

3 Hatnufa Street, Floor 6, Yokneam Iliit, Israel  
(Address of principal executive offices)

2069203  
(Zip Code)

Kevin Hershberger, telephone: +972.4.952.0123  
(Name and telephone number, including area code, of the person to contact in connection with this report)

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:  
 Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2016.

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## **Section 1- Conflict Minerals Disclosures**

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

#### ***Introduction***

This Specialized Disclosure Form (“Form SD”) of ReWalk Robotics Ltd. (the “Company,” “we,” or “us”) is filed pursuant to Rule 13p-1 (the “Rule”) promulgated under the Securities Exchange Act of 1934, as amended (the “1934 Act”), for the reporting period from January 1, 2016 to December 31, 2016.

The Rule requires disclosure of certain information when a company manufactures or contracts to manufacture products for which the minerals specified in the Rule are necessary to the functionality or production of those products. The specified minerals are gold, columbite-tantalite (coltan), cassiterite and wolframite, including their derivatives, which are limited to tantalum, tin and tungsten (collectively, the “Conflict Minerals”), that originated in the Democratic Republic of the Congo (“DRC”) and certain adjoining countries (collectively with the DRC, the “Covered Countries”).

#### ***Conclusion Based on Reasonable Country of Origin Inquiry***

In accordance with the Rule, the Company has concluded in good faith that during the year ended December 31, 2016:

- Certain of the Company’s operations manufactured, or contracted to manufacture, products (the “Covered Products”) for which the Conflict Minerals are necessary to the functionality or production of those products.
- Based on the Company’s good faith reasonable country of origin inquiry regarding the Conflict Minerals, which was designed to determine whether any of the Conflict Minerals contained in the Company’s Covered Products originated in the Covered Countries and whether any of the Conflict Minerals contained in the Covered Products are or may be from recycled or scrap sources, the Company had reason to believe that (i) the Conflict Minerals contained in its Covered Products may have originated in the Covered Countries and (ii) such Conflict Minerals may not be from recycled or scrap sources.

On the basis of these conclusions, the Company proceeded to exercise due diligence with respect to the source and chain of custody of the Conflict Minerals contained in its Covered Products. The Conflict Minerals Report (the “CMR”) describing the Company’s due diligence efforts is attached as Exhibit 1.01 to this Form SD for the reporting period from January 1, 2016 to December 31, 2016. This CMR has not been subject to an independent private sector audit.

#### ***Conflict Minerals Disclosure***

A copy of the Company’s CMR is filed as Exhibit 1.01 hereto, and is publicly available on the “Corporate Governance” page in the “Investor Relations” section of the Company’s website at <http://ir.rewalk.com/phoenix.zhtml?c=253715&p=irol-irhome>. Information contained on, or that can be accessed through, the Company’s website does not constitute a part of this Form SD or the attached CMR and is not incorporated by reference herein.

#### **Item 1.02 Exhibit**

As specified in Section 2, Item 2.01 of this Form SD, the Company is hereby filing its CMR as Exhibit 1.01 to this Form SD.

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**Section 2- Exhibits**

**Item 2.01 – Exhibits**

Exhibit 1.01 — Conflict Minerals Report of ReWalk Robotics Ltd. for the year ended December 31, 2016, as required by Items 1.01 and 1.02 of this Form SD.

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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.

ReWalk Robotics Ltd.  
(Registrant)

/s/Kevin Hershberger  
Name: Kevin Hershberger  
Title: Chief Financial Officer

May 31, 2017  
(Date)

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**Conflict Minerals Report of  
ReWalk Robotics Ltd.  
For the year ended December 31, 2016**

**Introduction**

This is the Conflict Minerals Report (the “CMR”) of ReWalk Robotics Ltd. (the “Company,” “we” or “us”) for calendar year 2016 in accordance with Rule 13p-1 (the “Rule”) under the Securities Exchange Act of 1934, as amended (the “1934 Act”). The Rule requires disclosure of certain information when a registrant manufactures or contracts to manufacture products and the “Conflict Minerals” specified in the Rule are necessary to the functionality or production of those products (the “Covered Products”).

“Conflict Minerals” are defined as gold, columbite-tantalite (coltan), cassiterite and wolframite, including their derivatives, which are limited to tantalum, tin and tungsten. Tantalum, tin, tungsten and gold are collectively referred to as “3TG” for the purposes of this assessment. According to the Rule, if a registrant, based on a good faith reasonable country of origin inquiry regarding the Conflict Minerals, has reason to believe that (i) the Conflict Minerals contained in its Covered Products may have originated in the Democratic Republic of the Congo (“DRC”) or an adjoining country (collectively with the DRC, the “Covered Countries”) or (ii) such Conflict Minerals may not be from recycled or scrap sources, then the registrant must exercise due diligence on the source and chain of custody of the Conflict Minerals, and submit a conflict minerals report describing those due diligence measures.

**Reasonable Country of Origin Inquiry**

During the year ended December 31, 2016, we conducted a reasonable country of origin inquiry to determine whether any of the necessary 3TG originating in the Covered Countries can be found in our products. We held meetings with management from various departments to discuss the applicable definitions of “manufacturer” and/or “contract to manufacture.” By way of this process, we identified specific types of product parts that are affected by the 3TG and mapped them to their respective suppliers.

We developed a risk-based approach that focuses on our key suppliers involved in manufacturing the majority of our finished products. We identified 22 relevant suppliers. We requested that all identified suppliers provide information regarding the origin of the Conflict Minerals contained in products supplied using the Conflict Minerals Reporting Template (“CMRT”) developed by the Conflict-Free Sourcing Initiative (“CFSI”).

We reviewed the responses received, checked for inconsistencies, incomplete forms, and inaccurate responses, and sent reminders to suppliers who did not respond to our requests for information. We compared the smelters and refiners identified in the surveys against the lists of facilities which have received a conflict-free designation by the CFSI’s Conflict-Free Smelter Program (“CFSP”).

In accordance with the Rule, we concluded in good faith that during the year ended December 31, 2016:

- Certain of our operations manufactured, or contracted to manufacture, products for which Conflict Minerals are necessary to the functionality or production of those products.
- Based on our good faith reasonable country of origin inquiry regarding the Conflict Minerals, which was designed to determine whether any of the Conflict Minerals contained in our Covered Products originated in the Covered Countries and whether any of the Conflict Minerals contained in the Covered Products are or may be from recycled or scrap sources, we had reason to believe that (i) the Conflict Minerals contained in our Covered Products may have originated in the Covered Countries and (ii) such Conflict Minerals may not be from recycled or scrap sources.

As a result, we exercised due diligence on the Conflict Minerals' source and chain of custody and are filing this CMR with our Form SD to comply with the requirements of the Rule. This CMR has not been subject to an independent private sector audit. The due diligence measures performed by the Company are discussed below.

## **Part I. Company Overview and Description of the Company's Products Covered by This Report**

The Company is designing, developing and commercializing the ReWalk system, an innovative exoskeleton that allows wheelchair-bound persons with mobility impairments or other medical conditions to stand and walk once again. The ReWalk system consists of a light wearable brace support suit which integrates motors at the joints, rechargeable batteries, an array of sensors and a computer-based control system to power knee and hip movement. There are currently two types of products: ReWalk Personal and ReWalk Rehabilitation. ReWalk Personal is designed for everyday use by individuals at home and in their communities, and is custom fitted for each user. ReWalk Rehabilitation is designed for the clinical rehabilitation environment where it provides valuable exercise and therapy. It also enables individuals to evaluate their capacity for using the ReWalk Personal system in the future.

## **Part II. The Company's Due Diligence Process**

### **Design of Due Diligence**

We have adopted a process in accordance with Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition (2016), including the related Supplements on Tin, Tantalum and Tungsten and on Gold published by the Organisation for Economic Co-Operation and Development (collectively, the "OECD Guidance").

The design of our Conflict Minerals program is in conformity with the OECD Guidance, specifically as it relates to our position in the minerals supply chain as a company that is several levels removed from the actual mining of Conflict Minerals (i.e., a "downstream company"). We do not make direct purchases of raw ore or unrefined Conflict Minerals. Summarized below are the design components of our Conflict Minerals program as they relate to the five-step framework set forth in the OECD Guidance:

### **Due Diligence Performed**

#### *Step 1. Establish Strong Company Management Systems*

*Adopt and commit to a supply chain policy for minerals from conflict-affected and high-risk areas.*

We have adopted our Conflict Minerals Policy (the "Policy") related to our sourcing of 3TG. Our Policy outlines our commitment to responsible sourcing and the requirements imposed on participants in our supply chain, and is available on the "Corporate Governance" page in the "Investor Relations" section of our website at <http://ir.rewalk.com/phoenix.zhtml?c=253715&p=irol-irhome>. Information contained on, or that can be accessed through, our website does not constitute a part of this CMR and is not incorporated by reference herein.

*Structure internal management systems to support supply chain due diligence.*

We provide, from time to time as necessary, training on the relevant Rule and process for relevant employees (e.g., purchasing, legal and finance).

*Establish a system of controls and transparency over the Conflict Minerals supply chain.*

We have implemented a supply chain system of controls and transparency through the use of due diligence tools created by the CFSI. These tools include, as discussed in “Step 2” below, the CMRT designed to identify the smelters and refiners that process the necessary Conflict Minerals contained in our products. We have also adopted a process to maintain business records relating to 3TG due diligence, including retention of records of our due diligence processes, findings and resulting decisions for a period of five years.

*Establish a Company-level grievance mechanism.*

Our Policy includes a grievance procedure by which suppliers and other external parties may contact us should they wish to seek guidance or report concerns regarding Conflict Minerals.

*Step 2. Identify and Assess Risks in the Supply Chain*

*Identify risks in the supply chain by identifying Company suppliers.*

As explained above, we do not buy raw ore or unrefined Conflict Minerals directly from refiners, smelters or mines. Our supply chain with respect to the Covered Products is complex, with multiple intermediaries and third parties in the supply chain between the manufacturing of the Covered Products and the original sources of the necessary Conflict Minerals. Because we believe that the smelters and refiners of the Conflict Minerals are best situated to identify the sources of Conflict Minerals, we rely on our direct suppliers to provide information on the origin of the Conflict Minerals contained in components and materials supplied to us.

As discussed above under “Reasonable Country of Origin Inquiry” and “Part I. Company Overview and Description of the Company’s Products Covered by This Report,” we identified our Covered Products falling within the scope of the Rule (i.e., products which were manufactured or contracted to be manufactured by us) during the 2016 calendar year. Based on these Covered Products, we were able to identify the suppliers from which we purchase components or materials for the Covered Products that may include Conflict Minerals. We identified 22 relevant suppliers whose products may contain 3TG.

*Request Conflict Minerals Reporting Templates (CMRTs) from suppliers.*

We surveyed these 22 suppliers to identify the 3TG contained in the products they supply us with, the smelters and refiners that process the 3TG and the country of origin of such 3TG. The survey was conducted by utilizing the CMRT. We utilize this CFSI reporting template to collect data and information from our suppliers in order to identify the origins of 3TG in our supply chain. We received responses from 11 suppliers (50%).

*Analyze surveys for CFSI compliant and active smelters and refiners.*

We compared smelters/refiners identified by the supply chain survey against the CFSI's Conflict-Free Smelter List, which lists all facilities that have received a "conflict-free compliant" designation from the CFSI. We reviewed all of the responses to determine whether smelters and refiners identified in our supply chain obtained a designation of "conflict-free compliant" or "active" from the CFSI.

To compile its list, the CFSI employs independent third-party auditors to audit the source, including mines of origin and chains of custody, of the Conflict Minerals processed by smelters and refiners which agree to undergo an audit. A smelter or refiner receives a "conflict-free compliant" designation from the CFSI if (i) the audited smelter or refiner adheres to the CFSP's assessment protocols by disclosing to auditors the identities and locations of the mines from which it sources Conflict Minerals and (ii) the independent auditor verifies separately that the smelter's or refiner's Conflict Minerals originated from conflict-free sources. The CFSI Conflict-Free Smelter List provides the names, locations and links to Conflict Minerals policies of all smelters and refiners deemed compliant with the CFSP's assessment protocols. Smelters and refiners labeled as "active" have committed to undergo an audit which remains in progress. These "active" smelters and refiners may be at various stages of the audit cycle, anywhere from completing the necessary documents to scheduling the audit date to enacting corrective actions in the post-audit phase. Smelters or refiners may not retain their "active" status if they are unresponsive to requests for re-audit or corrective action past a certain time.

Of the CMRT responses we received from suppliers, some included incomplete responses as well as inconsistencies and inaccuracies within the reported data. In such cases, we contacted the suppliers directly in an effort to secure revised responses. Through this process, we have identified, to the best of our efforts, the smelters/refiners in our supply chain and country of origin information for the smelters and refiners identified by the supply chain survey.

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

We are working to improve our due diligence processes with respect to 3TG. Our risk mitigation efforts during 2016 included those discussed in this section.

*Participate in existing industry conflict minerals initiatives.*

In light of the complexity of our and our suppliers' supply chains, we are currently unable to assess adequately all of the risks in our supply chain. However, we continue to engage with suppliers to obtain current, accurate and complete information about our supply chain through the use of the CMRT and to improve due diligence efforts to ensure responsible sourcing in compliance with our Policy.

*Report findings to designated senior management.*

The Company's senior management, including our Chief Financial Officer, is briefed periodically about our supply chain due diligence efforts, risk analysis results and mitigation efforts.

*Devise, adopt and implement a risk management plan and monitor risk mitigation efforts.*

We also periodically review our progress, assess identified risks and determine follow-up action, as follows:

- We follow up on inconsistent, incomplete, or inaccurate responses, and send reminders to suppliers who have not responded to our requests for information.
- Suppliers that source from smelters from the Covered Countries, where such smelters are not certified by the CFSP, are contacted and are asked to submit more information about their sourcing practices, including a corrective action plan.

*Step 4. Carry Out Independent Third-Party Audit of Smelter/Refiner's Due Diligence Practices*

We do not have a direct relationship with 3TG smelters and refiners. Therefore, we do not perform direct audits of these entities within our supply chain, but rely on the efforts of organizations such as the CFSI.

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

Our supply chain due diligence efforts are described in this CMR. We have filed this CMR in accordance with the Rule by submitting to the U.S. Securities and Exchange Commission a Form SD attaching this CMR. This CMR is also available on our website at <http://ir.rewalk.com/phoenix.zhtml?c=253715&p=irol-irhome>.

**Part III. The Company's Due Diligence Findings and Conclusions**

Our Conflict Minerals process, as described above, allowed us to identify in-scope products and the corresponding suppliers. These 22 identified suppliers were surveyed using the CMRT. We received survey responses from approximately 50% of our suppliers. The results from the surveys did not allow us to make definitive conclusions as to the source of any potential Conflict Minerals.

*Facilities Used to Process the Conflict Minerals in the Covered Products*

Based on the information provided by our suppliers as well as by CFSI, as of the date of this CMR, we believe that the facilities that may have been used to process the Conflict Minerals in our products may include the smelters and refiners listed in Annex I hereto.

*Countries of Origin of the Conflict Minerals in the Covered Products*

Based on the information provided by our suppliers as well as by CFSI, as of the date of this CMR, we believe that the mine countries of origin of the Conflict Minerals contained in our products may include one or more of the countries listed in Annex II hereto.

We can only provide reasonable, not absolute, assurance regarding the source and chain of custody of the Conflict Minerals in our Covered Products, since the information comes from direct and secondary suppliers and the CFSI. Information gathered from our suppliers is not on a continuous, real-time basis. Despite our efforts to follow up with certain suppliers, we did not receive responses from all suppliers, and the suppliers who responded showed varying degrees of cooperation with our inquiries.

#### **Part IV. Implementation of Strategies to Respond to Identified Risks and Future Steps**

We have taken, and intend to continue taking, steps to improve our due diligence processes and to minimize the risk that our necessary Conflict Minerals benefit armed groups. Going forward, we will continue working with our global supply chain to ensure responsible sourcing and assure compliance with applicable regulations through the following steps:

1. Contacting from time to time, as is reasonably required, direct suppliers that do not respond to the supply chain survey by a specified date, requesting their responses.
2. Comparing, as is reasonably required, applicable smelters and refiners identified by the supply chain survey against the list of facilities that have received a “conflict-free” designation from the CFSI.
3. Making a good faith effort to enact terms and conditions related to Conflict Minerals in supplier contracts.

#### **Forward-Looking Statements**

In addition to historical facts, this CMR contains forward-looking statements within the meaning of Section 27A of the U.S. Securities Act of 1933, as amended, Section 21E of the 1934 Act, and the safe harbor provisions of the U.S. Private Securities Litigation Reform Act of 1995. We have based these forward-looking statements on our current expectations and projections about future events. Forward-looking statements include information regarding further supplier engagement, due diligence and risk mitigation efforts and strategy, and involve certain risks and uncertainties. Actual results could differ materially from the forward looking statements. Words such as “expects,” “anticipates,” “intends,” variations of these words, and similar expressions are intended to identify such forward looking statements. Risks and uncertainties that could cause actual results to differ include, without limitation, risks and uncertainties associated with the progress of industry and other supply chain transparency and smelter or refiner validation programs for Conflict Minerals (including the possibility of inaccurate information, fraud and other irregularities), inadequate supplier education and knowledge, limitations on the ability or willingness of suppliers to provide more accurate, complete and detailed information and limitations on our ability to verify the accuracy or completeness of any supply chain information provided by suppliers and other factors discussed under the heading “Risk Factors” in our annual report on Form 10-K for the year ended December 31, 2016, as amended, filed with the U.S. Securities and Exchange Commission and other documents subsequently filed with or furnished to the U.S. Securities and Exchange Commission. Any forward-looking statement made in this CMR speaks only as of the date hereof. Except as otherwise required by law, the Company undertakes no obligation to update publicly the information contained in this CMR, or any forward looking statements, to reflect new information, events or circumstances after the date they were made, or to reflect the occurrence of unanticipated events.

**List of Identified Smelters or Refiners**

<b>Metal</b>	<b>Smelter Name</b>	<b>Smelter Country</b>
Gold	Bangalore Refinery	INDIA
Gold	Modeltech Sdn Bhd	MALAYSIA
Gold	Ögussa Österreichische Gold- und Silber-Scheideanstalt GmbH	AUSTRIA
Gold	WIELAND Edelmetalle GmbH	GERMANY
Gold	SAXONIA Edelmetalle GmbH	GERMANY
Gold	SAAMP	FRANCE
Gold	Tony Goetz NV	BELGIUM
Gold	Remondis Argentia B.V.	NETHERLANDS
Gold	T.C.A S.p.A	ITALY
Gold	Sudan Gold Refinery	SUDAN
Gold	Kaloti Precious Metals	UNITED ARAB EMIRATES
Gold	Emirates Gold DMCC	UNITED ARAB EMIRATES
Gold	Al Etihad Gold Refinery DMCC	UNITED ARAB EMIRATES
Gold	Fidelity Printers and Refiners Ltd.	ZIMBABWE
Gold	KGHM Polska Miedź Spółka Akcyjna	POLAND
Gold	MMTC-PAMP India Pvt., Ltd.	INDIA
Gold	Faggi Enrico S.p.A.	ITALY

Gold	Umicore Precious Metals Thailand	THAILAND
Gold	Guangdong Jinding Gold Limited	CHINA
Gold	Safina a.s.	CZECH REPUBLIC
Gold	Morris and Watson	NEW ZEALAND
Gold	Zijin Mining Group Co., Ltd. Gold Refinery	CHINA
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA
Gold	Yokohama Metal Co., Ltd.	JAPAN
Gold	YAMAMOTO PRECIOUS METAL CO., LTD.	JAPAN
Gold	Western Australian Mint trading as The Perth Mint	AUSTRALIA
Gold	Valcambi S.A.	SWITZERLAND
Gold	Umicore S.A. Business Unit Precious Metals Refining	BELGIUM
Gold	Umicore Brasil Ltda.	BRAZIL
Gold	Tongling Nonferrous Metals Group Co., Ltd.	CHINA
Gold	Tokuriki Honten Co., Ltd.	JAPAN
Gold	The Refinery of Shandong Gold Mining Co., Ltd.	CHINA
Gold	Great Wall Precious Metals Co., Ltd. of CBPM	CHINA
Gold	Tanaka Kikinzoku Kogyo K.K.	JAPAN
Gold	Sumitomo Metal Mining Co., Ltd.	JAPAN
Gold	SOE Shyolkovsky Factory of Secondary Precious Metals	RUSSIAN FEDERATION

Gold	Sichuan Tianze Precious Metals Co., Ltd.	CHINA
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CHINA
Gold	Shandong Tiancheng Biological Gold Industrial Co., Ltd.	CHINA
Gold	SEMPSA Joyería Platería S.A.	SPAIN
Gold	Schone Edelmetaal B.V.	NETHERLANDS
Gold	Royal Canadian Mint	CANADA
Gold	Rand Refinery (Pty) Ltd.	SOUTH AFRICA
Gold	PX Précinox S.A.	SWITZERLAND
Gold	PT Aneka Tambang (Persero) Tbk	INDONESIA
Gold	Prioksky Plant of Non-Ferrous Metals	RUSSIAN FEDERATION
Gold	Penglai Penggang Gold Industry Co., Ltd.	CHINA
Gold	PAMP S.A.	SWITZERLAND
Gold	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	RUSSIAN FEDERATION
Gold	Ohura Precious Metal Industry Co., Ltd.	JAPAN
Gold	Nihon Material Co., Ltd.	JAPAN
Gold	Navoi Mining and Metallurgical Combinat	UZBEKISTAN
Gold	Nadir Metal Rafineri San. Ve Tic. A.Ş.	TURKEY
Gold	Moscow Special Alloys Processing Plant	RUSSIAN FEDERATION
Gold	Mitsui Mining and Smelting Co., Ltd.	JAPAN

Gold	Mitsubishi Materials Corporation	JAPAN
Gold	Metalúrgica Met-Mex Peñoles S.A. De C.V.	MEXICO
Gold	Metalor Technologies S.A.	SWITZERLAND
Gold	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE
Gold	Metalor Technologies (Hong Kong) Ltd.	CHINA
Gold	Metalor Technologies (Suzhou) Ltd.	CHINA
Gold	Matsuda Sangyo Co., Ltd.	JAPAN
Gold	Luoyang Zijin Yinhui Gold Refinery Co., Ltd.	CHINA
Gold	Lingbao Jinyuan Tonghui Refinery Co., Ltd.	CHINA
Gold	Lingbao Gold Co., Ltd.	CHINA
Gold	L'azurde Company For Jewelry	SAUDI ARABIA
Gold	Kyrgyzaltyn JSC	KYRGYZSTAN
Gold	Kojima Chemicals Co., Ltd.	JAPAN
Gold	Kazzinc	KAZAKHSTAN
Gold	Kazakhmys Smelting LLC	KAZAKHSTAN
Gold	JX Nippon Mining & Metals Co., Ltd.	JAPAN
Gold	JSC Uralelectromed	RUSSIAN FEDERATION
Gold	JSC Ekaterinburg Non-Ferrous Metal Processing Plant	RUSSIAN FEDERATION

Gold	Asahi Refining Canada Ltd.	CANADA
Gold	Jiangxi Copper Co., Ltd.	CHINA
Gold	Japan Mint	JAPAN
Gold	Istanbul Gold Refinery	TURKEY
Gold	Ishifuku Metal Industry Co., Ltd.	JAPAN
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CHINA
Gold	Hunan Chenzhou Mining Co., Ltd.	CHINA
Gold	Heraeus Precious Metals GmbH & Co. KG	GERMANY
Gold	Heraeus Ltd. Hong Kong	CHINA
Gold	Heimerle + Meule GmbH	GERMANY
Gold	Hangzhou Fuchunjiang Smelting Co., Ltd.	CHINA
Gold	Guoda Safina High-Tech Environmental Refinery Co., Ltd.	CHINA
Gold	Gansu Seemine Material Hi-Tech Co., Ltd.	CHINA
Gold	OJSC Novosibirsk Refinery	RUSSIAN FEDERATION
Gold	Eco-System Recycling Co., Ltd.	JAPAN
Gold	Dowa	JAPAN
Gold	DODUCO GmbH	GERMANY
Gold	Daye Non-Ferrous Metals Mining Ltd.	CHINA
Gold	Chugai Mining	JAPAN

Gold	Chimet S.p.A.	ITALY
Gold	Yunnan Copper Industry Co., Ltd.	CHINA
Gold	Cendres + Métaux S.A.	SWITZERLAND
Gold	CCR Refinery - Glencore Canada Corporation	CANADA
Gold	Caridad	MEXICO
Gold	C. Hafner GmbH + Co. KG	GERMANY
Gold	Boliden AB	SWEDEN
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES
Gold	Aurubis AG	GERMANY
Gold	Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	TURKEY
Gold	Asaka Riken Co., Ltd.	JAPAN
Gold	Asahi Pretec Corp.	JAPAN
Gold	Argor-Heraeus S.A.	SWITZERLAND
Gold	AngloGold Ashanti Córrego do Sítio Mineração	BRAZIL
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN
Gold	Allgemeine Gold-und Silberscheideanstalt A.G.	GERMANY
Gold	Aida Chemical Industries Co., Ltd.	JAPAN
Gold	Asahi Refining USA Inc.	UNITED STATES OF AMERICA
Gold	DSC (Do Sung Corporation)	KOREA (REPUBLIC OF)

Gold	Elemetal Refining, LLC	UNITED STATES OF AMERICA
Gold	Kennecott Utah Copper LLC	UNITED STATES OF AMERICA
Gold	LS-NIKKO Copper Inc.	KOREA (REPUBLIC OF)
Gold	Materion	UNITED STATES OF AMERICA
Gold	Metalor USA Refining Corporation	UNITED STATES OF AMERICA
Gold	Republic Metals Corporation	UNITED STATES OF AMERICA
Gold	Samduck Precious Metals	KOREA (REPUBLIC OF)
Gold	Singway Technology Co., Ltd.	TAIWAN, PROVINCE OF CHINA
Gold	Solar Applied Materials Technology Corp.	TAIWAN, PROVINCE OF CHINA
Gold	Torecom	KOREA (REPUBLIC OF)
Gold	United Precious Metal Refining, Inc.	UNITED STATES OF AMERICA
Gold	Sabin Metal Corp.	UNITED STATES OF AMERICA
Gold	Geib Refining Corporation	UNITED STATES OF AMERICA
Gold	HwaSeong CJ Co., Ltd.	KOREA (REPUBLIC OF)
Gold	Samwon Metals Corp.	KOREA (REPUBLIC OF)
Gold	So Accurate Group, Inc.	UNITED STATES OF AMERICA
Gold	Advanced Chemical Company	UNITED STATES OF AMERICA
Gold	AU Traders and Refiners	SOUTH AFRICA
Gold	AURA-II	UNITED STATES OF AMERICA

Gold	Daejin Indus Co., Ltd.	KOREA (REPUBLIC OF)
Gold	Gujarat Gold Centre	INDIA
Gold	Korea Zinc Co., Ltd.	KOREA (REPUBLIC OF)
Gold	Sai Refinery	INDIA
Gold	TOO Tau-Ken-Altyn	KAZAKHSTAN
Gold	Universal Precious Metals Refining Zambia	ZAMBIA
Gold	Faggi Enrico S.p.A.	ITALY
Tantalum	Jiangxi Tuohong New Raw Material	CHINA
Tantalum	Resind Indústria e Comércio Ltda.	BRAZIL
Tantalum	Global Advanced Metals Aizu	JAPAN
Tantalum	Plansee SE Reutte	AUSTRIA
Tantalum	H.C. Starck Smelting GmbH & Co. KG	GERMANY
Tantalum	H.C. Starck Ltd.	JAPAN
Tantalum	H.C. Starck Hermsdorf GmbH	GERMANY
Tantalum	H.C. Starck GmbH Laufenburg	GERMANY
Tantalum	H.C. Starck GmbH Goslar	GERMANY
Tantalum	H.C. Starck Co., Ltd.	THAILAND
Tantalum	Plansee SE Liezen	AUSTRIA
Tantalum	KEMET Blue Metals	MEXICO

Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHINA
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	CHINA
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA
Tantalum	FIR Metals & Resource Ltd.	CHINA
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA
Tantalum	Yichun Jin Yang Rare Metal Co., Ltd.	CHINA
Tantalum	Ulba Metallurgical Plant JSC	KAZAKHSTAN
Tantalum	Taki Chemicals	JAPAN
Tantalum	Solikamsk Magnesium Works OAO	RUSSIAN FEDERATION
Tantalum	RFH Tantalum Smeltry Co., Ltd.	CHINA
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA
Tantalum	Molycorp Silmet A.S.	ESTONIA
Tantalum	Mitsui Mining & Smelting	JAPAN
Tantalum	Mineração Taboca S.A.	BRAZIL
Tantalum	Metallurgical Products India Pvt., Ltd.	INDIA
Tantalum	LSM Brasil S.A.	BRAZIL
Tantalum	King-Tan Tantalum Industry Ltd.	CHINA
Tantalum	Jiujiang Tanbre Co., Ltd.	CHINA
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINA

Tantalum	Guangdong Zhiyuan New Material Co., Ltd.	CHINA
Tantalum	F&X Electro-Materials Ltd.	CHINA
Tantalum	Duoluoshan	CHINA
Tantalum	Conghua Tantalum and Niobium Smeltry	CHINA
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	CHINA
Tantalum	D Block Metals, LLC	UNITED STATES OF AMERICA
Tantalum	Exotech Inc.	UNITED STATES OF AMERICA
Tantalum	Global Advanced Metals Boyertown	UNITED STATES OF AMERICA
Tantalum	H.C. Starck Inc.	UNITED STATES OF AMERICA
Tantalum	Hi-Temp Specialty Metals, Inc.	UNITED STATES OF AMERICA
Tantalum	Telex Metals	UNITED STATES OF AMERICA
Tantalum	Zhuzhou Cemented Carbide Group Co., Ltd.	CHINA
Tantalum	KEMET Blue Powder	UNITED STATES OF AMERICA
Tantalum	Power Resources Ltd.	MACEDONIA (THE FORMER YUGOSLAV REPUBLIC OF)
Tantalum	E.S.R. Electronics	UNITED STATES OF AMERICA
Tantalum	QuantumClean	UNITED STATES OF AMERICA
Tantalum	Tranzact, Inc.	UNITED STATES OF AMERICA
Tin	Gejiu Jinye Mineral Company	CHINA

Tin	Modeltech Sdn Bhd	MALAYSIA
Tin	Guanyang Guida Nonferrous Metal Smelting Plant	CHINA
Tin	Gejiu Fengming Metallurgy Chemical Plant	CHINA
Tin	HuiChang Hill Tin Industry Co., Ltd.	CHINA
Tin	PT Kijang Jaya Mandiri	INDONESIA
Tin	An Thai Minerals Co., Ltd.	VIET NAM
Tin	PT Sukses Inti Makmur	INDONESIA
Tin	PT Bangka Prima Tin	INDONESIA
Tin	Elmet S.L.U.	SPAIN
Tin	Metallo-Chimique N.V.	BELGIUM
Tin	PT O.M. Indonesia	INDONESIA
Tin	Resind Indústria e Comércio Ltda.	BRAZIL
Tin	An Vinh Joint Stock Mineral Processing Company	VIET NAM
Tin	PT Cipta Persada Mulia	INDONESIA
Tin	CV Tiga Sekawan	INDONESIA
Tin	CV Dua Sekawan	INDONESIA
Tin	Tuyen Quang Non-Ferrous Metals Joint Stock Company	VIET NAM
Tin	Nghe Tinh Non-Ferrous Metals Joint Stock Company	VIET NAM
Tin	Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company	VIET NAM

Tin	CV Ayi Jaya	INDONESIA
Tin	PT Inti Stania Prima	INDONESIA
Tin	O.M. Manufacturing Philippines, Inc.	PHILIPPINES
Tin	Phoenix Metal Ltd.	RWANDA
Tin	PT ATD Makmur Mandiri Jaya	INDONESIA
Tin	Melt Metais e Ligas S.A.	BRAZIL
Tin	PT Wahana Perkit Jaya	INDONESIA
Tin	PT Tirus Putra Mandiri	INDONESIA
Tin	Magnu's Minerais Metais e Ligas Ltda.	BRAZIL
Tin	CV Venus Inti Perkasa	INDONESIA
Tin	Yunnan Tin Company Limited	CHINA
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA
Tin	White Solder Metalurgia e Mineraçao Ltda.	BRAZIL
Tin	VQB Mineral and Trading Group JSC	VIET NAM
Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	CHINA
Tin	Thaisarco	THAILAND
Tin	Soft Metais Ltda.	BRAZIL
Tin	PT Tommy Utama	INDONESIA
Tin	PT Tinindo Inter Nusa	INDONESIA

Tin	PT Timah (Persero) Tbk Mentok	INDONESIA
Tin	PT Timah (Persero) Tbk Kundur	INDONESIA
Tin	PT Sumber Jaya Indah	INDONESIA
Tin	PT Stanindo Inti Perkasa	INDONESIA
Tin	PT Sariwiguna Binasentosa	INDONESIA
Tin	PT REFINED BANGKA TIN	INDONESIA
Tin	PT Prima Timah Utama	INDONESIA
Tin	PT Panca Mega Persada	INDONESIA
Tin	PT Mitra Stania Prima	INDONESIA
Tin	PT Karimun Mining	INDONESIA
Tin	PT Eunindo Usaha Mandiri	INDONESIA
Tin	PT DS Jaya Abadi	INDONESIA
Tin	PT Bukit Timah	INDONESIA
Tin	PT Belitung Industri Sejahtera	INDONESIA
Tin	PT Bangka Tin Industry	INDONESIA
Tin	PT Babel Inti Perkasa	INDONESIA
Tin	PT Artha Cipta Langgeng	INDONESIA
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND
Tin	Nankang Nanshan Tin Manufactory Co., Ltd.	CHINA

Tin	Mitsubishi Materials Corporation	JAPAN
Tin	Minsur	PERU
Tin	Mineração Taboca S.A.	BRAZIL
Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA
Tin	China Tin Group Co., Ltd.	CHINA
Tin	Gejiu Kai Meng Industry and Trade LLC	CHINA
Tin	Huichang Jinshunda Tin Co., Ltd.	CHINA
Tin	Gejiu Zili Mining And Metallurgy Co., Ltd.	CHINA
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA
Tin	Fenix Metals	POLAND
Tin	Estanho de Rondônia S.A.	BRAZIL
Tin	Dowa	JAPAN
Tin	CV United Smelting	INDONESIA
Tin	CV Serumpun Sebalai	INDONESIA
Tin	PT Aries Kencana Sejahtera	INDONESIA
Tin	PT Justindo	INDONESIA
Tin	CV Gita Pesona	INDONESIA
Tin	Cooperativa Metalurgica de Rondônia Ltda.	BRAZIL
Tin	CNMC (Guangxi) PGMA Co., Ltd.	CHINA

Tin	Jiangxi Ketai Advanced Material Co., Ltd.	CHINA
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CHINA
Tin	Alpha	UNITED STATES OF AMERICA
Tin	EM Vinto	BOLIVIA (PLURINATIONAL STATE OF)
Tin	Metallic Resources, Inc.	UNITED STATES OF AMERICA
Tin	Operaciones Metalurgical S.A.	BOLIVIA (PLURINATIONAL STATE OF)
Tin	PT Menara Cipta Mulia	INDONESIA
Tin	Rui Da Hung	TAIWAN, PROVINCE OF CHINA
Tin	PT Lautan Harmonis Sejahtera	INDONESIA
Tin	Linwu Xianggui Ore Smelting Co., Ltd.	CHINA
Tin	PT BilliTin Makmur Lestari	INDONESIA
Tungsten	Moliren Ltd	RUSSIAN FEDERATION
Tungsten	ACL Metais Eireli	BRAZIL
Tungsten	Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.	CHINA
Tungsten	Philippine Chuangxin Industrial Co., Inc.	PHILIPPINES
Tungsten	South-East Nonferrous Metal Company Limited of Hengyang City	CHINA
Tungsten	Hydrometallurg, JSC	RUSSIAN FEDERATION
Tungsten	Jiangxi Dayu Longxintai Tungsten Co., Ltd.	CHINA
Tungsten	Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji	CHINA

Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA
Tungsten	Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC	VIET NAM
Tungsten	H.C. Starck Smelting GmbH & Co.KG	GERMANY
Tungsten	H.C. Starck GmbH	GERMANY
Tungsten	Ganzhou Yatai Tungsten Co., Ltd.	CHINA
Tungsten	Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd.	CHINA
Tungsten	Dayu Jincheng Tungsten Industry Co., Ltd.	CHINA
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.	CHINA
Tungsten	Asia Tungsten Products Vietnam Ltd.	VIET NAM
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CHINA
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CHINA
Tungsten	Malipo Haiyu Tungsten 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	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHINA
Tungsten	Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.	CHINA
Tungsten	Xinhai Rendan Shaoguan Tungsten Co., Ltd.	CHINA

Tungsten	Xiamen Tungsten Co., Ltd.	CHINA
Tungsten	Wolfram Bergbau und Hütten AG	AUSTRIA
Tungsten	Vietnam Youngsun Tungsten Industry Co., Ltd.	VIET NAM
Tungsten	Tejing (Vietnam) Tungsten Co., Ltd.	VIET NAM
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	CHINA
Tungsten	Japan New Metals Co., Ltd.	JAPAN
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.	CHINA
Tungsten	Hunan Chenzhou Mining Co., Ltd.	CHINA
Tungsten	Fujian Jinxin Tungsten Co., Ltd.	CHINA
Tungsten	Dayu Weiliang Tungsten Co., Ltd.	CHINA
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CHINA
Tungsten	A.L.M.T. TUNGSTEN Corp.	JAPAN
Tungsten	Global Tungsten & Powders Corp.	UNITED STATES OF AMERICA
Tungsten	Kennametal Fallon	UNITED STATES OF AMERICA
Tungsten	Kennametal Huntsville	UNITED STATES OF AMERICA
Tungsten	Niagara Refining LLC	UNITED STATES OF AMERICA
Tungsten	Unecha Refractory metals plant	RUSSIAN FEDERATION
Tungsten	Woltech Korea Co., Ltd.	KOREA (REPUBLIC OF)

Tungsten	Ganxian Shirui New Material Co., Ltd.	CHINA
Tungsten	Ganzhou Non-ferrous Metals Smelting Co., Ltd.	CHINA
Tungsten	Pobedit, JSC	RUSSIAN FEDERATION

**List of Countries of Origin of Conflict Minerals**

Based on our due diligence, the above smelters and refiners may process Conflict Minerals from one or more of the following countries of origin:

<b>Metal</b>	<b>Countries</b>
Gold	China, Italy, Japan, Canada, Peru, Spain, Portugal, Bolivia, Chile, Mexico, Australia, Indonesia, Brazil, Argentina, Azerbaijan, Burkina Faso, Dominican Republic, Ecuador, Ghana, Guinea, Liberia, Malaysia, Mauritania, Peru, Tanzania, USA, South Africa, Switzerland, Angola, Burundi, Philippines, Laos, Thailand, Germany, Belgium, Russia
Tantalum	Russia, Brazil, Ethiopia, China, Australia, Rwanda, USA, Germany, Japan, Thailand, Canada, Mozambique, Zimbabwe, India, Niger, Austria
Tin	China, Malaysia, Indonesia, Brazil, Austria, Bolivia, Rwanda, Australia, Peru, Thailand, Poland, Philippines, Japan, Russia, Belgium, The Democratic Republic Of Congo
Tungsten	China, Canada, Russia, Malaysia, Australia, Bolivia, Portugal, Spain, Vietnam, Brazil, Columbia, USA, Mexico, Nigeria, Rwanda, Spain, Thailand, Vietnam