

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

FORM SD

SPECIALIZED DISCLOSURE REPORT

TriMas Corporation

(Exact name of registrant as specified in its charter)

Delaware

(State or other jurisdiction
of incorporation)

001-10716

(Commission
File Number)

38-2687639

(IRS Employer
Identification No.)

**39400 Woodward Avenue, Suite 130
Bloomfield Hills, Michigan**

(Address of principal
executive offices)

48304

(Zip Code)

Joshua A. Sherbin, Senior Vice President, General Counsel and Chief Compliance Officer 248-631-5400
(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, 2015.

Section 1 - Conflict Minerals Disclosure

Item 1.01. Conflict Minerals Disclosure and Report.

Introduction

TriMas Corporation (“TriMas” or the “Company”) is a global designer, manufacturer and distributor of applied products for commercial, industrial and consumer markets. TriMas is filing this Form SD (“Form SD”) pursuant to Rule 13p-1 under the Securities Exchange Act of 1934 (the “Rule”) for the reporting period January 1, 2015 to December 31, 2015 (the “Reporting Period”).

TriMas manufactures or contracts to manufacture “products” that may contain certain “conflict minerals” (as defined below) that are necessary to the functionality or production of such products. Form SD defines “conflict minerals” as: (i)(a) columbite-tantalite (or coltan, the metal ore from which tantalum is extracted), (b) cassiterite (the metal ore from which tin is extracted), (c) gold and (d) wolframite (the metal ore from which tungsten is extracted), or their derivatives; or (ii) any other mineral or its derivatives determined by the U.S. Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country (collectively, the “Covered Countries”).

Conflict Minerals Disclosures

In accordance with the Rule and Form SD, TriMas has conducted a good faith reasonable country of origin inquiry (“RCOI”) regarding the conflict minerals included in its products during the Reporting Period to determine whether any of such conflict minerals originated in the Covered Countries and/or whether any of such conflict minerals may be from recycled or scrap sources.

In accordance with the Rule, TriMas has filed this Form SD and the associated Conflict Minerals Report, each of which are posted to TriMas’ publicly available internet site at www.trimascorp.com.

Item 1.02. Exhibit.

A description of the RCOI and the measures TriMas took to exercise due diligence on the source and chain of custody of certain of its conflict minerals is provided in the Conflict Minerals Report attached hereto as Exhibit 1.01. The content on, or accessible through, any website referred to in this Form SD is not incorporated by reference into this Form SD unless expressly noted.

Section 2 - Exhibits

Item 2.01. Exhibits.

| Exhibit Number | Description |
|----------------|---|
| 1.01 | Conflict Minerals Report of TriMas Corporation. |

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.

TriMas Corporation

/s/ Joshua A. Sherbin

Name: Joshua A. Sherbin

Title: Senior Vice President, General Counsel, Chief Compliance
Officer and Corporate Secretary

May 27, 2016

Date

TriMas Corporation
Conflict Minerals Report
For the Reporting Period January 1, 2015 to December 31, 2015

TriMas Corporation (“TriMas” or the “Company”) is filing this Conflict Minerals Report (“CMR”) for the reporting period January 1, 2015 to December 31, 2015 (the “Reporting Period”) as an exhibit to its Form SD (“Form SD”) pursuant to Rule 13p-1 under the Securities Exchange Act of 1934 (the “Rule”). TriMas manufactures or contracts to manufacture “products” that may contain conflict minerals, as defined by the Rule, present in its supply chain that may have originated in Democratic Republic of the Congo or an adjoining country (the “Covered Countries”) and may not be from recycled or scrap sources. Accordingly, TriMas is filing this CMR as an exhibit to Form SD to describe the due diligence measures taken to determine the source and chain of custody of the conflict minerals used in its products during the Reporting Period.

1) Reasonable Country of Origin Inquiry

In accordance with the Rule and Form SD, TriMas conducted a good faith reasonable country of origin inquiry (“RCOI”) regarding the conflict minerals included in its products during the Reporting Period to determine whether any of such conflict minerals originated in the Covered Countries and/or whether any of such conflict minerals may be from recycled or scrap sources.

a) Supplier Engagement

To complete the RCOI, TriMas’ tier 1 suppliers were requested to provide information regarding the presence and sourcing of conflict minerals used in the products supplied to TriMas. The program utilized the Conflict-Free Sourcing Initiative’s Conflict Minerals Reporting Template (“CMRT”). Suppliers were offered two options to submit the required information, either by uploading a completed CMRT or by completing an online survey version of the template directly to a third-party platform operated by Assent Compliance, a vendor retained by TriMas. In their responses, suppliers specified whether information was being provided at the company level or the product level.

During the supplier survey, suppliers were contacted via Assent Compliance Manager, a SaaS platform, operated by Assent Compliance, that enables its users to complete and track supplier communications as well as allow suppliers to upload completed CMRT forms directly to the platform for risk assessment and management. In their responses, suppliers specified whether information was being provided at the company level or the product level. Non-responsive suppliers were contacted a minimum of three times by Assent Compliance Manager and then were also managed by the Assent Compliance supply chain team in one-on-one communications. This included two follow ups from the supply chain team. For the 2015 reporting period, TriMas received responses from 426, or 92%, of its 462 in-scope suppliers. Of the 426 suppliers that provided a response, approximately 25% reported that their products contained either tin, tantalum, tungsten or gold (“3TG”) necessary to the functionality or production of their products.

This year’s program includes automated data validation on all submitted CMRTs. The goal of data validation is to increase the accuracy of submissions and identify any contradictory answers in the CMRT. All submitted forms are accepted and classified as valid or invalid so that data is still retained. Suppliers were contacted in regards to invalid forms and were encouraged to resubmit a valid form. For the 2015 reporting period, TriMas had 32 invalid CMRTs, or 7% of submitted responses.

As mentioned above, the CMRTs received allowed TriMas to collect and compile, via Assent Compliance Manager, all answers from the CMRT with respect to smelter information reflected in the CMRTs. With respect to smelter information reflected in the CMRTs, there were suppliers who did not provide smelter lists. Without having full smelter information for TriMas products from all suppliers in scope, TriMas is unable to determine that there is no sourcing from the Covered Countries. In connection with its evaluation of the CMRTs, TriMas and Assent undertook due diligence to validate supplier reports.

b) Information Cut-Off

The deadline for suppliers to submit RCOI information for the Reporting Period was April 30, 2016.

2) Due Diligence Process

Based on the information obtained pursuant to the RCOI process described above, the Company conducted additional due diligence to determine the source and chain of custody of the conflict minerals used in its products during the Reporting Period.

TriMas' due diligence process is based on the Organization for Economic Cooperation and Development's ("OECD") Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and accompanying Supplements. The OECD Guidance was written for both upstream¹ and downstream² companies in the supply chain. As TriMas is a downstream company in the supply chain, TriMas' due diligence practices were tailored accordingly. Due diligence measures undertaken by TriMas included the following:

a) Establish Strong Company Management Systems

Adopt A Conflict Minerals Policy

TriMas adopted a Responsible Sourcing and Conflict Minerals Policy ("Conflict Minerals Policy"). This policy is available on TriMas' website at www.trimascorp.com/supplier.htm.

Assemble An Internal Team To Support Supply Chain Due Diligence

TriMas' Senior Management Compliance Committee (the "SMCC") formed a broad, interdisciplinary and cross-functional committee, the Conflict Minerals Compliance Committee ("CMCC"), comprised of individuals representing multiple TriMas departments and business units to oversee and drive conflict minerals compliance. Together with Assent Compliance, TriMas' Director of Compliance worked with the Company's business units to complete tasks associated with the supplier due diligence process. The CMCC worked with the business units to further facilitate the diligence process to collect information regarding the presence and sourcing of conflict minerals in the products supplied to TriMas.

Establish A System Of Controls And Transparency Over The Supply Chain

To provide better transparency within TriMas' supply chain and to facilitate communication of policies and expectations, TriMas engaged a third-party information management service provider (Assent Compliance) to complement internal management processes. The Assent Compliance online system and processes are used to identify suppliers in TriMas' supply chain and collect, store and review information on conflict minerals sourcing practices, track information on SORs, and flag risks based on SOR sourcing practices. This system is designed to allow collection and housing of data on supply chain circumstances, which can be updated to reflect changes within the supply chain, such as new customer-supplier relationships and new products.

TriMas mandated compliance in its supply chain with TriMas' Conflict Minerals Policy through its contractual terms and conditions.

TriMas maintains an ethics hotline accessible at www.trimascorp.com through which a party, including TriMas employees and suppliers, may submit reports or concerns regarding compliance, including with respect to conflict minerals.

¹ Upstream companies refer to those between the mine and smelters or refiners ("SOR"). As such, the companies typically include miners, local traders, or exporters from the country of mineral origin, international concentrate traders and SORs.

² Downstream companies refer to those entities between the SOR and retailer. As such, the companies typically include metal traders and exchanges, component manufacturers, product manufacturers, original equipment manufacturers and retailers.

Implement Internal Measures Taken To Strengthen Company Engagement With Suppliers

TriMas has increased its supply chain transparency by identifying risks within its supply chain. TriMas is committed to conducting business in a socially responsible manner and partnering with suppliers who are similarly committed. TriMas' supplier compliance process requires that suppliers comply with various contract provisions, legal requirements and industrial standards under local, regional and national laws and regulations of the countries in which the suppliers conduct business. Through this process, TriMas remains engaged with its supply base from a compliance perspective.

Reporting Mechanism

We have established reporting mechanisms whereby employees and suppliers can report violations of the Company's policies, including our Conflict Minerals Policy.

b) Identify and Assess Risk in Our Supply Chain

TriMas identified 462 in-scope direct suppliers. We rely on suppliers whose materials or components contain 3TG to provide us with information about the source of 3TG contained in those materials or components. Our direct suppliers similarly rely upon information provided by their suppliers. We believe many of our largest suppliers are suppliers to other SEC registrants that are subject to the Rule.

In accordance with OECD Guidelines, it is important to understand risk levels associated with conflict minerals in the supply chain. Smelters that are not certified as DRC-conflict free by third party sources such as the Conflict-Free Sourcing Initiative ("CFSI") or the London Bullion Market Association ("LBMA") Responsible Gold Programme, may pose a significant risk. Where a smelter is not identified as conflict free by such sources, we rate the risk as high, medium or low. This rating is based on various factors, including whether the smelter/refiner has been identified as a valid smelter/refiner and has an associated Smelter Identification Number (under the CFSI, this is known as a CID), and the smelter's geographic location, including proximity to the Covered Countries.

We calculate supplier risk based on the chance that a supplier provides 3TGs that may originate from non-conflict free sources. The value of this risk is calculated based on the risk ratings of the smelters declared by that Supplier on their CMRT.

Additionally, each suppliers is evaluated on the strength of its conflict minerals program (further assisting in identifying risk in the supply chain). Evaluating and tracking the strength of the program can assist in making key risk mitigation decisions as the program progresses. The criteria used to evaluate the strength of a supplier's program are:

- Do you have a policy in place that includes DRC conflict-free sourcing?
- Have you implemented due diligence measures for conflict-free sourcing?
- Do you verify due diligence information received from your suppliers?
- Does your verification process include corrective action management?

The more positive the responses to these questions indicate a stronger conflict sourcing initiative.

As part of our risk management plan and to ensure suppliers understand our expectations, we have, through Assent Compliance, provided video and written training on conflict minerals and the CMRT. This includes instructions on completing the form and one-on-one email and phone discussions with supplier personnel.

In accordance with our Conflict Minerals Policy, if a supplier we have engaged gives us reason to believe that it may be supplying us with 3TG from sources that may support conflict in a Covered Country, we encourage the supplier to establish an alternative source of 3TG that does not support such conflict, as provided in the OECD guidance. If we are not satisfied with the results, we may initiate steps to find replacement suppliers.

Tracing materials back to their mine of origin is a complex aspect of responsible sourcing in our supply chain. We have determined that seeking information about 3TG smelters and refiners in our supply chain represents an appropriate effort to determine the mines or locations of origin of the 3TGs in our supply chain. This was done by adopting methodology outlined by the CFSI's joint industry programs and outreach initiatives and requiring our suppliers to

conform with the same standards to meet the OECD Guidelines, and report to us using the CMRT. Through this industry joint effort, we made reasonable determination of the mines or locations of origin of the 3TGs in our supply chain. We also requested that all of our suppliers support the initiative by following the sourcing initiative and working to align their declared sources with the “Known” and “Conflict Free” lists of sourced metals.

c) Design and Implement a Strategy to Respond to Risks

As part of TriMas’ strategy to mitigate risk and to ensure suppliers understand our expectations, we have provided video, recorded training, and documented instructions through Assent Compliance. Responses to the reporting CMRT were reviewed with specific suppliers where clarification was needed. As described in our Conflict Minerals Policy, we intend to engage any of our suppliers whom we have reason to believe are supplying us with 3TG from sources that may support conflict in the DRC or any adjoining country to establish an alternative source of 3TG that does not support such conflict, as provided in the OECD guidance.

Suppliers that may expose the Company to unacceptable risks, either due to unacceptable responses to our inquiries or a refusal to respond, may be evaluated by the SMCC.

d) Carry out Independent Third Party Audit of Supply Chain Due Diligence at Identified Points in the Supply Chain

TriMas does not have a direct relationship with conflict minerals smelters or refiners and as a result, TriMas does not perform direct audits of these entities in its supply chain. TriMas relies on the efforts of the industry associations that administer independent third-party smelter and refinery audit programs and encourages suppliers with more direct relationships with smelters to participate in comparable due diligence validation activities.

e) Report Annually on Supply Chain Due Diligence

TriMas’ Form SD and CMR are publicly available at www.trimascorp.com and meet the OECD recommendation to report annually on supply chain due diligence.

3) Diligence Results

TriMas identified 462 Tier 1 suppliers as in-scope for the CMR for the Reporting Period. Approximately 92% of the Tier 1 suppliers responded to TriMas’ conflict minerals survey and 25% of the responding suppliers indicated one or more of the regulated conflict minerals as necessary to the functionality or production of the products supplied to TriMas. Based on the RCOI and the due diligence measures described in this CMR, specifically the fact that most CMRTs are at the company level and not the product level specifically pertaining to TriMas products, TriMas was unable to validate that any of the SORs identified by suppliers are in its supply chain.

The information that we received from a majority of our direct suppliers was at their company-wide level. Thus, the SORs identified by our direct suppliers may contain SORs that processed conflict minerals that our direct suppliers supplied to their other customers, but not to us. As a result, we are unable to conclusively determine whether the SORs were used to process the conflict minerals necessary to the functionality or production of our products during 2015. Because of this uncertainty, we are also unable to conclusively determine whether each of the countries of origin identified were the country of origin of conflict minerals in our products during 2015, and therefore also unable to determine the source and chain of custody of those conflict minerals. In addition, the third-party audits conducted by the CFSI, the LBMA and the information that we receive from our direct suppliers may yield inaccurate or incomplete information. For example, the information received from our direct suppliers may be incomplete because they may not have received accurate and complete conflict minerals information from all of the suppliers in their own supply chain. We also do not have access to audit reports or detailed findings of the third-party audits conducted as part of the CFSI Conflict-Free Smelter Program or the LBMA Responsible Gold Programme and, as a result, are not responsible for the quality of these audits or the audit findings.

For all responses that indicated a smelter, Assent Compliance compared the facilities listed to the list of smelters

maintained by the “CFSI.” If a supplier indicated that the facility was certified as “Conflict-Free,” Assent confirmed that the name was listed by CFSI as a certified smelter. As of April 30, 2016, we have validated 320 SORs and we are working to validate the additional SOR entries from the submitted CMRTs. Appendix A lists the smelters and refiners that the suppliers we surveyed reported as being in their supply chains. We have not listed in Appendix A any SORs that we have not been able to validate. Appendix A also includes an aggregated list of the countries of origin from which the reported facilities collectively source conflict minerals, based on information provided by suppliers and CFSI.

4) Steps to Improve Due Diligence and Mitigate Risk

TriMas will work to continuously improve its supply chain due diligence efforts through the following measures:

- a)** Continue supply chain due diligence efforts and engagement with suppliers to identify sources of conflict minerals;
- b)** Continue to clearly communicate expectations with regard to supplier compliance, transparency and sourcing;
- c)** Continue to engage with suppliers that provided incomplete or uncertain smelter information or did not respond to our survey request;
- d)** Continue to compare RCOI results to information collected via independent conflict free smelter validation programs; and
- e)** Contact smelters identified as a result of the RCOI process and request their participation in obtaining a “conflict free” designation from an industry program.

APPENDIX A

| Metal | Smelter Name | Smelter Facility Location | Conflict Free? |
|--------------|---|----------------------------------|-----------------------|
| Gold | Advanced Chemical Company | UNITED STATES | |
| Gold | Aida Chemical Industries Co., Ltd. | JAPAN | Yes |
| Gold | Aktyubinsk Copper Company TOO | KAZAKHSTAN | |
| Gold | Al Etihad Gold Refinery DMCC | UNITED ARAB EMIRATES | |
| Gold | Allgemeine Gold-und Silberscheideanstalt A.G. | GERMANY | Yes |
| Gold | Almalyk Mining and Metallurgical Complex (AMMC) | UZBEKISTAN | |
| Gold | AngloGold Ashanti Córrego do Sítio Mineração | BRAZIL | Yes |
| Gold | Argor-Heraeus SA | SWITZERLAND | Yes |
| Gold | Asahi Pretec Corporation | JAPAN | Yes |
| Gold | Asahi Refining Canada Limited | CANADA | Yes |
| Gold | Asahi Refining USA Inc. | UNITED STATES | Yes |
| Gold | Asaka Riken Co., Ltd. | JAPAN | Yes |
| Gold | Atasay Kuyumculuk Sanayi Ve Ticaret A.S. | TURKEY | Yes |
| Gold | Aurubis AG | GERMANY | Yes |
| Gold | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | PHILIPPINES | Yes |
| Gold | Bauer Walser AG | GERMANY | |
| Gold | Boliden AB | SWEDEN | Yes |
| Gold | C. Hafner GmbH + Co. KG | GERMANY | Yes |
| Gold | Caridad | MEXICO | |
| Gold | CCR Refinery - Glencore Canada Corporation | CANADA | Yes |
| Gold | Cendres + Métaux SA | SWITZERLAND | |
| Gold | Chimet S.p.A. | ITALY | Yes |
| Gold | Chugai Mining | JAPAN | |
| Gold | Daejin Indus Co., Ltd. | KOREA, REPUBLIC OF | |
| Gold | Daye Non-Ferrous Metals Mining Ltd. | CHINA | |
| Gold | Do Sung Corporation | KOREA, REPUBLIC OF | |
| Gold | DODUCO GmbH | GERMANY | Yes |
| Gold | Dowa | JAPAN | Yes |
| Gold | Eco-System Recycling Co., Ltd. | JAPAN | Yes |
| Gold | Elemetal Refining, LLC | UNITED STATES | Yes |
| Gold | Emirates Gold DMCC | UNITED ARAB EMIRATES | |
| Gold | Faggi Enrico S.p.A. | ITALY | |
| Gold | Fidelity Printers and Refiners Ltd. | ZIMBABWE | |
| Gold | Gansu Seemine Material Hi-Tech Co., Ltd. | CHINA | |
| Gold | Geib Refining Corporation | UNITED STATES | |
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM | CHINA | |
| Gold | Guangdong Jinding Gold Limited | CHINA | |
| Gold | Guoda Safina High-Tech Environmental Refinery Co., Ltd. | CHINA | |
| Gold | Hangzhou Fuchunjiang Smelting Co., Ltd. | CHINA | |

| | | | |
|------|---|-------------------------|-----|
| Gold | Heimerle + Meule GmbH | GERMANY | Yes |
| Gold | Heraeus Ltd. Hong Kong | CHINA | Yes |
| Gold | Heraeus Precious Metals GmbH & Co. KG | GERMANY | Yes |
| Gold | Hunan Chenzhou Mining Co., Ltd. | CHINA | |
| Gold | Hwasung CJ Co., Ltd. | KOREA, REPUBLIC OF | |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Company Limited | CHINA | |
| Gold | Ishifuku Metal Industry Co., Ltd. | JAPAN | Yes |
| Gold | Istanbul Gold Refinery | TURKEY | Yes |
| Gold | Japan Mint | JAPAN | Yes |
| Gold | Jiangxi Copper Company Limited | CHINA | Yes |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant | RUSSIAN FEDERATION | Yes |
| Gold | JSC Uralelectromed | RUSSIAN FEDERATION | Yes |
| Gold | JX Nippon Mining & Metals Co., Ltd. | JAPAN | Yes |
| Gold | Kaloti Precious Metals | UNITED ARAB EMIRATES | |
| Gold | Kazakhmys Smelting LLC | KAZAKHSTAN | |
| Gold | Kazzinc | KAZAKHSTAN | Yes |
| Gold | Kennecott Utah Copper LLC | UNITED STATES | Yes |
| Gold | KGHM Polska MiedŹ Spó³ka Akcyjna | POLAND | |
| Gold | Kojima Chemicals Co., Ltd. | JAPAN | Yes |
| Gold | Korea Metal Co., Ltd. | KOREA, REPUBLIC OF | |
| Gold | Korea Zinc Co. Ltd. | KOREA, REPUBLIC OF | |
| Gold | Kyrgyzaltyn JSC | KYRGYZSTAN | |
| Gold | L' azurde Company For Jewelry | SAUDI ARABIA | Yes |
| Gold | Lingbao Gold Company Limited | CHINA | |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd. | CHINA | |
| Gold | LS-NIKKO Copper Inc. | KOREA, REPUBLIC OF | Yes |
| Gold | Luoyang Zijin Yinhui Gold Refinery Co., Ltd. | CHINA | |
| Gold | Materion | UNITED STATES | Yes |
| Gold | Matsuda Sangyo Co., Ltd. | JAPAN | Yes |
| Gold | Metahub Industries Sdn. Bhd. | MALAYSIA | |
| Gold | Metalor Technologies (Hong Kong) Ltd. | CHINA | Yes |
| Gold | Metalor Technologies (Singapore) Pte., Ltd. | SINGAPORE | Yes |
| Gold | Metalor Technologies (Suzhou) Ltd. | CHINA | |
| Gold | Metalor Technologies SA | SWITZERLAND | Yes |
| Gold | Metalor USA Refining Corporation | UNITED STATES | Yes |
| Gold | METALÚRGICA MET-MEX PEÑALES, S.A. DE C.V | MEXICO | Yes |
| Gold | Mitsubishi Materials Corporation | JAPAN | Yes |
| Gold | Mitsui Mining and Smelting Co., Ltd. | JAPAN | Yes |
| Gold | MMTC-PAMP India Pvt., Ltd. | INDIA | Yes |
| Gold | Morris and Watson | NEW ZEALAND | |

| | | | |
|------|---|--------------------|-----|
| Gold | Moscow Special Alloys Processing Plant | RUSSIAN FEDERATION | Yes |
| Gold | Nadir Metal Rafineri San. Ve Tic. A. ^a . | TURKEY | Yes |
| Gold | Navoi Mining and Metallurgical Combinat | UZBEKISTAN | |
| Gold | Nihon Material Co., Ltd. | JAPAN | Yes |
| Gold | Ögussa Österreichische Gold- und Silber-Scheideanstalt GmbH | AUSTRIA | Yes |
| Gold | Ohura Precious Metal Industry Co., Ltd. | JAPAN | Yes |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | RUSSIAN FEDERATION | Yes |
| Gold | OJSC Kolyma Refinery | RUSSIAN FEDERATION | |
| Gold | OJSC Novosibirsk Refinery | RUSSIAN FEDERATION | Yes |
| Gold | PAMP SA | SWITZERLAND | Yes |
| Gold | Penglai Penggang Gold Industry Co., Ltd. | CHINA | |
| Gold | Prioksky Plant of Non-Ferrous Metals | RUSSIAN FEDERATION | Yes |
| Gold | PT Aneka Tambang (Persero) Tbk | INDONESIA | Yes |
| Gold | PX Précinox SA | SWITZERLAND | Yes |
| Gold | Rand Refinery (Pty) Ltd. | SOUTH AFRICA | Yes |
| Gold | Republic Metals Corporation | UNITED STATES | Yes |
| Gold | Royal Canadian Mint | CANADA | Yes |
| Gold | SAAMP | FRANCE | |
| Gold | Sabin Metal Corp. | UNITED STATES | |
| Gold | Samduck Precious Metals | KOREA, REPUBLIC OF | |
| Gold | SAMWON Metals Corp. | KOREA, REPUBLIC OF | |
| Gold | SAXONIA Edelmetalle GmbH | GERMANY | |
| Gold | Schone Edelmetaal B.V. | NETHERLANDS | Yes |
| Gold | SEMPSA Joyería Platería SA | SPAIN | Yes |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | CHINA | |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd. | CHINA | Yes |
| Gold | Sichuan Tianze Precious Metals Co., Ltd. | CHINA | Yes |
| Gold | Singway Technology Co., Ltd. | TAIWAN | Yes |
| Gold | So Accurate Group, Inc. | UNITED STATES | |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals | RUSSIAN FEDERATION | |
| Gold | Solar Applied Materials Technology Corp. | TAIWAN | Yes |
| Gold | Sudan Gold Refinery | SUDAN | |
| Gold | Sumitomo Metal Mining Co., Ltd. | JAPAN | Yes |
| Gold | T.C.A S.p.A | ITALY | Yes |
| Gold | Tanaka Kikinzoku Kogyo K.K. | JAPAN | Yes |
| Gold | The Refinery of Shandong Gold Mining Co., Ltd. | CHINA | Yes |
| Gold | Tokuriki Honten Co., Ltd. | JAPAN | Yes |
| Gold | Tongling Nonferrous Metals Group Co., Ltd. | CHINA | |
| Gold | Tony Goetz NV | BELGIUM | |
| Gold | Torecom | KOREA, REPUBLIC OF | |

| | | | |
|----------|--|----------------|-----|
| Gold | Umicore Brasil Ltda. | BRAZIL | Yes |
| Gold | Umicore Precious Metals Thailand | THAILAND | Yes |
| Gold | Umicore SA Business Unit Precious Metals Refining | BELGIUM | Yes |
| Gold | United Precious Metal Refining, Inc. | UNITED STATES | Yes |
| Gold | Valcambi SA | SWITZERLAND | Yes |
| Gold | Western Australian Mint trading as The Perth Mint | AUSTRALIA | Yes |
| Gold | WIELAND Edelmetalle GmbH | GERMANY | |
| Gold | Yamamoto Precious Metal Co., Ltd. | JAPAN | Yes |
| Gold | Yokohama Metal Co., Ltd. | JAPAN | Yes |
| Gold | Yunnan Copper Industry Co., Ltd. | CHINA | |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | CHINA | Yes |
| Gold | Zijin Mining Group Co., Ltd. Gold Refinery | CHINA | Yes |
| Tantalum | Avon Specialty Metals Ltd | UNITED KINGDOM | |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd. | CHINA | Yes |
| Tantalum | Conghua Tantalum and Niobium Smeltry | CHINA | Yes |
| Tantalum | D Block Metals, LLC | UNITED STATES | Yes |
| Tantalum | Duoluoshan | CHINA | Yes |
| Tantalum | E.S.R. Electronics | UNITED STATES | |
| Tantalum | Exotech Inc. | UNITED STATES | Yes |
| Tantalum | F&X Electro-Materials Ltd. | CHINA | Yes |
| Tantalum | FIR Metals & Resource Ltd. | CHINA | Yes |
| Tantalum | Global Advanced Metals Aizu | JAPAN | Yes |
| Tantalum | Global Advanced Metals Boyertown | UNITED STATES | Yes |
| Tantalum | Guangdong Zhiyuan New Material Co., Ltd. | CHINA | Yes |
| Tantalum | Guizhou Zhenhua Xinyun Technology Ltd., Kaili branch | CHINA | Yes |
| Tantalum | H.C. Starck Co., Ltd. | THAILAND | Yes |
| Tantalum | H.C. Starck GmbH Goslar | GERMANY | Yes |
| Tantalum | H.C. Starck GmbH Laufenburg | GERMANY | Yes |
| Tantalum | H.C. Starck Hermsdorf GmbH | GERMANY | Yes |
| Tantalum | H.C. Starck Inc. | UNITED STATES | Yes |
| Tantalum | H.C. Starck Ltd. | JAPAN | Yes |
| Tantalum | H.C. Starck Smelting GmbH & Co.KG | GERMANY | Yes |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd. | CHINA | Yes |
| Tantalum | Hi-Temp Specialty Metals, Inc. | UNITED STATES | Yes |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd. | CHINA | Yes |
| Tantalum | Jiangxi Tuohong New Raw Material | CHINA | |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd. | CHINA | Yes |
| Tantalum | Jiujiang Tanbre Co., Ltd. | CHINA | Yes |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd. | CHINA | Yes |
| Tantalum | KEMET Blue Metals | MEXICO | Yes |
| Tantalum | KEMET Blue Powder | UNITED STATES | Yes |
| Tantalum | King-Tan Tantalum Industry Ltd. | CHINA | Yes |
| Tantalum | LSM Brasil S.A. | BRAZIL | Yes |
| Tantalum | Metallurgical Products India Pvt., Ltd. | INDIA | Yes |
| Tantalum | Mineração Taboca S.A. | BRAZIL | Yes |
| Tantalum | Mitsui Mining & Smelting | JAPAN | Yes |

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| Tantalum | Molycorp Silmet A.S. | ESTONIA | Yes |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd. | CHINA | Yes |
| Tantalum | Plansee SE Liezen | AUSTRIA | Yes |
| Tantalum | Plansee SE Reutte | AUSTRIA | Yes |
| Tantalum | QuantumClean | UNITED STATES | Yes |
| Tantalum | Resind Indústria e Comércio Ltda. | BRAZIL | Yes |
| Tantalum | RFH Tantalum Smeltry Co., Ltd. | CHINA | Yes |
| Tantalum | Solikamsk Magnesium Works OAO | RUSSIAN FEDERATION | Yes |
| Tantalum | Taki Chemicals | JAPAN | Yes |
| Tantalum | Telex Metals | UNITED STATES | Yes |
| Tantalum | Tranzact, Inc. | UNITED STATES | Yes |
| Tantalum | Ulba Metallurgical Plant JSC | KAZAKHSTAN | Yes |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd. | CHINA | Yes |
| Tantalum | Yichun Jin Yang Rare Metal Co., Ltd. | CHINA | Yes |
| Tantalum | Zhuzhou Cemented Carbide | CHINA | Yes |
| Tin | Alpha | UNITED STATES | Yes |
| Tin | An Thai Minerals Company Limited | VIET NAM | |
| Tin | An Vinh Joint Stock Mineral Processing Company | VIET NAM | |
| Tin | Chenzhou Yun Xiang mining limited liability company | CHINA | |
| Tin | China Tin Group Co., Ltd. | CHINA | |
| Tin | CNMC (Guangxi) PGMA Co., Ltd. | CHINA | |
| Tin | Cooperativa Metalurgica de Rondônia Ltda. | BRAZIL | Yes |
| Tin | CV Ayi Jaya | INDONESIA | Yes |
| Tin | CV Dua Sekawan | INDONESIA | |
| Tin | CV Gita Pesona | INDONESIA | Yes |
| Tin | CV Serumpun Sebalai | INDONESIA | Yes |
| Tin | CV Tiga Sekawan | INDONESIA | |
| Tin | CV United Smelting | INDONESIA | Yes |
| Tin | CV Venus Inti Perkasa | INDONESIA | Yes |
| Tin | Dowa | JAPAN | Yes |
| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | VIET NAM | |
| Tin | Elmet S.L.U. (Metallo Group) | SPAIN | Yes |
| Tin | EM Vinto | BOLIVIA | Yes |
| Tin | Estanho de Rondônia S.A. | BRAZIL | |
| Tin | Feinhütte Halsbrücke GmbH | GERMANY | |
| Tin | Fenix Metals | POLAND | Yes |
| Tin | Gejiu Fengming Metallurgy Chemical Plant | CHINA | |
| Tin | Gejiu Kai Meng Industry and Trade LLC | CHINA | |
| Tin | Gejiu Non-Ferrous Metal Processing Co., Ltd. | CHINA | Yes |
| Tin | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | CHINA | |
| Tin | Gejiu Zili Mining And Metallurgy Co., Ltd. | CHINA | |
| Tin | Guanyang Guida Nonferrous Metal Smelting Plant | CHINA | |
| Tin | HuiChang Hill Tin Industry Co., Ltd. | CHINA | |
| Tin | Huichang Jinshunda Tin Co., Ltd. | CHINA | |
| Tin | Jiangxi Ketai Advanced Material Co., Ltd. | CHINA | Yes |

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| Tin | Linwu Xianggui Ore Smelting Co., Ltd. | CHINA | |
| Tin | Magnu's Minerais Metais e Ligas Ltda. | BRAZIL | Yes |
| Tin | Malaysia Smelting Corporation (MSC) | MALAYSIA | Yes |
| Tin | Melt Metais e Ligas S/A | BRAZIL | Yes |
| Tin | Metahub Industries Sdn. Bhd. | MALAYSIA | |
| Tin | Metallic Resources, Inc. | UNITED STATES | Yes |
| Tin | Metallo-Chimique N.V. | BELGIUM | Yes |
| Tin | Mineração Taboca S.A. | BRAZIL | Yes |
| Tin | Minsur | PERU | Yes |
| Tin | Mitsubishi Materials Corporation | JAPAN | Yes |
| Tin | Nankang Nanshan Tin Manufactory Co., Ltd. | CHINA | |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company | VIET NAM | |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd. | THAILAND | Yes |
| Tin | O.M. Manufacturing Philippines, Inc. | PHILIPPINES | Yes |
| Tin | Operaciones Metalurgical S.A. | BOLIVIA | Yes |
| Tin | Phoenix Metal Ltd. | RWANDA | |
| Tin | PT Alam Lestari Kencana | INDONESIA | |
| Tin | PT Aries Kencana Sejahtera | INDONESIA | Yes |
| Tin | PT Artha Cipta Langgeng | INDONESIA | Yes |
| Tin | PT ATD Makmur Mandiri Jaya | INDONESIA | Yes |
| Tin | PT Babel Inti Perkasa | INDONESIA | Yes |
| Tin | PT Bangka Kudai Tin | INDONESIA | |
| Tin | PT Bangka Prima Tin | INDONESIA | Yes |
| Tin | PT Bangka Timah Utama Sejahtera | INDONESIA | |
| Tin | PT Bangka Tin Industry | INDONESIA | Yes |
| Tin | PT Belitung Industri Sejahtera | INDONESIA | Yes |
| Tin | PT BilliTin Makmur Lestari | INDONESIA | Yes |
| Tin | PT Bukit Timah | INDONESIA | Yes |
| Tin | PT Cipta Persada Mulia | INDONESIA | Yes |
| Tin | PT DS Jaya Abadi | INDONESIA | Yes |
| Tin | PT Eunindo Usaha Mandiri | INDONESIA | Yes |
| Tin | PT Fang Di MulTindo | INDONESIA | |
| Tin | PT Inti Stania Prima | INDONESIA | Yes |
| Tin | PT Justindo | INDONESIA | Yes |
| Tin | PT Karimun Mining | INDONESIA | |
| Tin | PT Kijang Jaya Mandiri | INDONESIA | |
| Tin | PT Mitra Stania Prima | INDONESIA | Yes |
| Tin | PT Panca Mega Persada | INDONESIA | Yes |
| Tin | PT Pelat Timah Nusantara Tbk | INDONESIA | |
| Tin | PT Prima Timah Utama | INDONESIA | Yes |
| Tin | PT Refined Bangka Tin | INDONESIA | Yes |
| Tin | PT Sariwiguna Binasentosa | INDONESIA | Yes |
| Tin | PT Seirama Tin Investment | INDONESIA | |
| Tin | PT Stanindo Inti Perkasa | INDONESIA | Yes |
| Tin | PT Sukses Inti Makmur | INDONESIA | Yes |
| Tin | PT Sumber Jaya Indah | INDONESIA | Yes |

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| Tin | PT Timah (Persero) Tbk Kundur | INDONESIA | Yes |
| Tin | PT Timah (Persero) Tbk Mentok | INDONESIA | Yes |
| Tin | PT Tinindo Inter Nusa | INDONESIA | Yes |
| Tin | PT Tirus Putra Mandiri | INDONESIA | |
| Tin | PT Tommy Utama | INDONESIA | Yes |
| Tin | PT Wahana Perkit Jaya | INDONESIA | Yes |
| Tin | Resind Indústria e Comércio Ltda. | BRAZIL | Yes |
| Tin | Rui Da Hung | TAIWAN | Yes |
| Tin | Soft Metais Ltda. | BRAZIL | Yes |
| Tin | Thaisarco | THAILAND | Yes |
| Tin | Tuyen Quang Non-Ferrous Metals Joint Stock Company | VIET NAM | |
| Tin | VQB Mineral and Trading Group JSC | VIET NAM | Yes |
| Tin | White Solder Metalurgia e Mineração Ltda. | BRAZIL | Yes |
| Tin | Yunnan Chengfeng Non-ferrous Metals Co., Ltd. | CHINA | |
| Tin | Yunnan Tin Group (Holding) Company Limited | CHINA | Yes |
| Tungsten | A.L.M.T. TUNGSTEN Corp. | JAPAN | Yes |
| Tungsten | ACL Metais Eireli | BRAZIL | |
| Tungsten | Asia Tungsten Products Vietnam Ltd. | VIET NAM | Yes |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd. | CHINA | Yes |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd. | CHINA | Yes |
| Tungsten | Dayu Jincheng Tungsten Industry Co., Ltd. | CHINA | |
| Tungsten | Dayu Weiliang Tungsten Co., Ltd. | CHINA | |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd. | CHINA | Yes |
| Tungsten | Ganxian Shirui New Material Co., Ltd. | CHINA | |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd. | CHINA | Yes |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd. | CHINA | Yes |
| Tungsten | Ganzhou Non-ferrous Metals Smelting Co., Ltd. | CHINA | |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd. | CHINA | Yes |
| Tungsten | Ganzhou Yatai Tungsten Co., Ltd. | CHINA | Yes |
| Tungsten | Global Tungsten & Powders Corp. | UNITED STATES | Yes |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd. | CHINA | Yes |
| Tungsten | H.C. Starck GmbH | GERMANY | Yes |
| Tungsten | H.C. Starck Smelting GmbH & Co.KG | GERMANY | Yes |
| Tungsten | Hunan Chenzhou Mining Co., Ltd. | CHINA | Yes |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji | CHINA | |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Yanglin | CHINA | |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd. | CHINA | Yes |
| Tungsten | Hydrometallurg, JSC | RUSSIAN FEDERATION | Yes |
| Tungsten | Japan New Metals Co., Ltd. | JAPAN | Yes |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd. | CHINA | |
| Tungsten | Jiangxi Dayu Longxintai Tungsten Co., Ltd. | CHINA | |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd. | CHINA | Yes |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. | CHINA | |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | CHINA | |
| Tungsten | Jiangxi Xincheng Tungsten Industry Co., Ltd. | CHINA | |
| Tungsten | Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd. | CHINA | Yes |

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| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd. | CHINA | |
| Tungsten | Kennametal Fallon | UNITED STATES | |
| Tungsten | Kennametal Huntsville | UNITED STATES | Yes |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd. | CHINA | Yes |
| Tungsten | Moliren Ltd | RUSSIAN FEDERATION | |
| Tungsten | Niagara Refining LLC | UNITED STATES | Yes |
| Tungsten | Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC | VIET NAM | Yes |
| Tungsten | Philippine Chuangin Industrial Co., Inc. | PHILIPPINES | |
| Tungsten | Pobedit, JSC | RUSSIAN FEDERATION | |
| Tungsten | Sanher Tungsten Vietnam Co., Ltd. | VIET NAM | |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd. | VIET NAM | Yes |
| Tungsten | Vietnam Youngsun Tungsten Industry Co., Ltd. | VIET NAM | Yes |
| Tungsten | Wolfram Bergbau und Hütten AG | AUSTRIA | Yes |
| Tungsten | Woltech Korea Co., Ltd. | KOREA, REPUBLIC OF | |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd. | CHINA | Yes |
| Tungsten | Xiamen Tungsten Co., Ltd. | CHINA | Yes |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd. | CHINA | |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd. | CHINA | Yes |

Appendix A - Countries of Origin

This list of potential countries of origin is populated based on publicly available information, our RCOI and due diligence. It is important to note that this is also based on company level responses and therefore, it is not certain which of these countries of origin can be linked to our products.

Argentina, Australia, Austria, Belgium, Bolivia, Brazil, Cambodia, Canada, Chile, China, Columbia, Cote D'Ivoire, Czech Republic, Djibouti, Ecuador, Egypt, Estonia, Ethiopia, France, Germany, Guyana, Hungary, India, Indonesia, Ireland, Israel, Japan, Kazakhstan, Laos, Luxembourg, Madagascar, Malaysia, Mongolia, Myanmar, Namibia, Netherlands, Nigeria, Peru, Portugal, Russia, Sierra Leone, Singapore, Slovakia, South Korea, Spain, Suriname, Switzerland, Taiwan, Thailand, United Kingdom, United States, Vietnam, Zimbabwe, Kenya, Mozambique, South Africa, Democratic Republic of the Congo, Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.