

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.)

**38505 Woodward Avenue, Suite 200**  
**Bloomfield Hills, Michigan**  
(Address of principal  
executive offices)

**48304**  
(Zip Code)

Jodi Robin, General Counsel and Secretary, 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, 2022.  
 Rule 13q-1 under the Securities Exchange Act (17 CFR 240.13q-1) for the fiscal year ended December 31, 2022.
-

## Section 1 – Conflict Minerals Disclosure

### Item 1.01. Conflict Minerals Disclosure and Report.

#### Introduction

TriMas Corporation ("TriMas" or the "Company"), and its consolidated subsidiaries, designs, engineers and manufactures innovative products under leading brand names for customers in the consumer products, aerospace & defense and industrial markets. The Company is principally engaged in the following reportable segments with diverse products and market channels: Packaging, Aerospace and Specialty Products. 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, 2022 to December 31, 2022 (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](http://www.trimascorp.com). The content on any website referred to in this Form SD is not incorporated by reference into this Form SD unless expressly noted.

#### 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 3 – Exhibits

### Item 3.01. Exhibits.

Exhibit Number	Description
1.01	<a href="#">Conflict Minerals Report of TriMas Corporation</a>

## 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/ Scott Mell

Name: Scott Mell

Title: Chief Financial Officer

May 25, 2023

Date

**TriMas Corporation**  
**Conflict Minerals Report**  
**For the Reporting Period January 1, 2022 to December 31, 2022**

TriMas Corporation (TriMas or the Company) is filing this Conflict Minerals Report (CMR) for the reporting period January 1, 2022 to December 31, 2022 (the Reporting Period) as an exhibit to its 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 the 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.

**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.

To determine whether tin, tantalum, tungsten or gold (3TG) necessary to the functionality or production of supplier products originated in Covered Countries, TriMas retained ComplianceXL, a third-party service provider, to assist in reviewing the supply chain and identifying risks. The Company provided a list composed of suppliers and parts associated with the in-scope products to ComplianceXL for upload to the SustainHub (SH) platform provided by iPoint.

To collect data on the materials' sources of origin procured by the supply chain, TriMas utilized the Conflict Minerals Reporting Template (CMRT) version 6.22 or higher to conduct a survey of all in-scope suppliers.

During the supplier survey, the Company contacted suppliers via the SH platform, enabling users to complete and track supplier communications, and allowing suppliers to upload completed CMRTs directly to the platform for validation, assessment and management. SH also provides functionality that meets the Organization for Economic Cooperation and Development's (OECD) Guidance process expectations by evaluating the quality of each supplier response. Additionally, the metrics provided in this report, as well as the step-by-step process for supplier engagement and upstream due diligence investigations performed, are managed through this platform.

Via SH and the ComplianceXL team, the Company requested that all suppliers complete a CMRT. Training and education to guide suppliers on best practices and the use of this template was included. ComplianceXL monitored and tracked all communications in SH for future reporting and transparency. TriMas directly contacted suppliers that were unresponsive to ComplianceXL's communications during the diligence process and requested these suppliers complete the CMRT and submit it to ComplianceXL.

The Company's program continues to include 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. This data validation is based on questions within the declaration tab of the CMRT which helps to identify areas that require further

classification or risk assessment, as well as understand the due diligence efforts of tier 1 suppliers. The results of this data validation are shared with the suppliers to ensure they understand areas that require clarification or improvement.

All submitted forms are accepted and classified as valid or invalid. Suppliers are contacted regarding invalid forms and are encouraged to submit a valid form. Suppliers are also provided with guidance on how to correct validation errors in their CMRT submission and direct engagement help through ComplianceXL. Since some suppliers may remain unresponsive to feedback, TriMas tracks program gaps to account for future improvement opportunities. TriMas also continued to perform further due diligence on the source and chain of custody of the minerals in question.

## **Due Diligence**

### **Design of Due Diligence**

TriMas' due diligence process is based on OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and accompanying Supplements. The OECD Guidance applies to both upstream<sup>1</sup> and downstream<sup>2</sup> companies in the supply chain. As TriMas is a downstream company in the supply chain, TriMas' tailored its due diligence practices accordingly. Due diligence measures undertaken by TriMas included those described below.

### **Due Diligence Performed**

#### **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 the TriMas website at [www.trimascorp.com](http://www.trimascorp.com). The content on any website referred to in this CMR is not incorporated by reference into this CMR unless expressly noted.

##### **Assemble an Internal Team to Support Supply Chain Due Diligence**

TriMas' senior management identified individuals representing multiple TriMas departments and business units to oversee and drive conflict minerals compliance. Together with ComplianceXL, TriMas' General Counsel and Secretary worked with the Company's business units to complete tasks associated with the supplier due diligence process. Individual leads within the business units further facilitated the diligence process to collect information regarding the presence and sourcing of conflict minerals in the products supplied to TriMas.

---

<sup>1</sup> 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.

<sup>2</sup> 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.

### 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 ComplianceXL to complement internal management processes. The ComplianceXL and SH online system and processes are used to identify suppliers in TriMas' supply chain and to 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](http://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.

### Supplier Engagement

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.

During this reporting period, we utilized the CMRT to collect conflict minerals declarations from our tier 1 suppliers. These declarations were uploaded into the SH web-based reporting platform. The use of these tools has allowed us to assist our suppliers in understanding our expectations and requirements, and increase the rate of responses we have received from our suppliers to our survey requests. ComplianceXL followed-up with suppliers to ensure proper completion of the CMRT, and all communication with suppliers has been documented to reflect the degree of success of these efforts.

To complete the RCOI, TriMas' in-scope 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 CMRT version 6.22 or higher to conduct a survey of all in-scope suppliers.

Suppliers were offered two options to submit the required information, either by uploading a completed CMRT or through direct submission to ComplianceXL.

During the supplier survey, suppliers were contacted via the SH platform, operated by ComplianceXL, enabling its users to complete and track supplier communications as well as allowing suppliers to upload completed CMRT forms directly to the platform for risk assessment and management. In their responses, suppliers specified whether the information provided was at the company level or the product level. Non-responsive suppliers were contacted a minimum of 17 times by ComplianceXL. For the 2022 reporting period, TriMas received responses from 548 or 81% of its 673 surveyed suppliers. Of the 548 suppliers that provided a response, approximately 99 reported that their products contained 3TG necessary to the functionality or production of their products.

Automated data validation on all submitted CMRTs is included in the program. The goal of data validation is to increase the accuracy of submissions and identify any contradictory answers in the CMRT. Suppliers were contacted in regards to invalid forms and were encouraged to resubmit a valid form. For the 2022 reporting period, TriMas had 0 invalid CMRTs.

As mentioned above, the CMRTs received allowed TriMas to collect and compile, via SH, 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 whether there is sourcing from the Covered Countries. In connection with its evaluation of the CMRTs, TriMas and ComplianceXL undertook due diligence to validate supplier reports.

#### Information Cut-Off

The deadline for suppliers to submit RCOI information for the Reporting Period was April 30, 2023.

#### Grievance Mechanism

We have established reporting mechanisms whereby employees and suppliers can report violations of the Company's policies, including our Conflict Minerals Policy through the ethics hotline on our website at [www.trimascorp.com](http://www.trimascorp.com)

#### Records Maintenance

Under our Records Retention Policy, compliance records are maintained for 10 years.

#### **Identify and Assess Risk in Our Supply Chain**

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 Responsible Minerals Initiative (RMI) or the London Bullion Market Association (LBMA) Responsible Gold Programme, may pose a 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 RMI, 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 supplier 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 Covered Countries 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 review 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 ComplianceXL, 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 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.

Once surveys were returned, ComplianceXL reviewed and attempted to match each verified SOR identified in the completed surveys to available lists of SORs that have been validated as conflict free under internationally-recognized schemes such as the RMI Responsible Minerals Assurance Process (RMAP). If an SOR was not validated by the RMAP, ComplianceXL attempted to contact the SOR to gather more information about its sourcing practices.

In accordance with OECD Guidelines, it is important to understand risk levels associated with conflict minerals in the supply chain. Smelters not certified Covered Country-Conflict Free may pose a risk to the supply chain. Each facility that meets the RMI definition of a smelter or refiner of a 3TGs mineral is assessed according to red flag indicators defined in the OECD Guidance.

As part of our risk management plan under the OECD Guidance, when facilities with red flags are reported on a CMRT by one of the suppliers surveyed, risk mitigation activities are initiated. Through ComplianceXL, submissions that include any red flag facilities immediately produce a receipt instructing the supplier to take their own risk mitigation actions, including submission of a product specific CMRT to better identify the connection to products that they supply to TriMas, and escalating up to removal of these red flag smelters from their supply chain.

As per the OECD Due Diligence Guidance, risk mitigation will depend on the supplier's specific context.

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 RMI'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 a 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.

#### 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 documented instructions through ComplianceXL. 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 Covered Countries 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 Company.

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.

ComplianceXL conducts outreach to all smelters and refineries that are not enrolled in the RMI's RMAP on behalf of TriMas. The purpose of this outreach is to encourage participation in the RMAP and to inquire about the facility's sourcing practices and infrastructure.

Report Annually on Supply Chain Due Diligence

TriMas' Form SD and CMR are publicly available at [www.trimascorp.com](http://www.trimascorp.com) and meet the OECD recommendation to report annually on supply chain due diligence.

## **Due Diligence Results**

For the 2022 reporting period, TriMas received responses from 548 or 81% of its 673 surveyed suppliers. Of the 548 suppliers that provided a response, approximately 99 reported that their products contained 3TG necessary to the functionality or production of their products. Based on the RCOI and the due diligence measures described in this CMR, specifically that most CMRTs are at the company level and not the product level pertaining to TriMas products, TriMas was unable to determine if any of the specific 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 2022. 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 2022, and therefore we were also unable to determine the source and chain of custody of those conflict minerals. In addition, the third-party audits conducted by the RMI, 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 RMI RMAP or the LBMA Responsible Gold Programme and, as a result, are not responsible for the quality of these audits or the audit findings.

In connection with our reasonable country of origin inquiry and due diligence, as applicable, our suppliers identified to us certain smelters and refiners as potentially having processed the necessary 3TG contained in our products in 2022. For all responses that indicated a smelter, ComplianceXL compared the facilities listed to the list of smelters maintained by the RMI. As of April 30, 2023, we have validated 259 SORs. 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. If a supplier indicated that the facility was certified as "Conflict-Free," ComplianceXL confirmed that the name was listed by RMI as a certified smelter.

## **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.

## **Smelters and Refiners**

Appendix A includes an aggregated list of smelters and refiners that our suppliers identified to us as potentially having processed the necessary 3TG contained in our products in 2022 based on information provided through the CMRT data collection process. As mentioned previously, it is understood that many supplier responses may provide more data than can be directly linked to products sold by TriMas, therefore, Appendix A may contain more smelters and refiners than those that the Company's products are being sourced from.

## **Smelter and Refiner Risk Evaluation**

Understanding the risks associated with the smelters and refiners potentially providing material into TriMas' supply chain is an important part of the due diligence process.

The following risk categories are used for smelter evaluation and risk determination:

- Geo-Risk
  - Did the mineral originate from or has been transported through a Covered Country?
- Audit Status
  - Has the refiner's due diligence practices been audited against a standard in conformance with the OECD Guidance?
  - ComplianceXL relies on the RMI audit standard, including cross-recognition of the LBMA Good Delivery Program and the Responsible Jewelry Council Chain of Custody Certification, which are developed according to global standards, including the OECD Guidance.
- Sourcing Risk
  - Has evidence of any other red flag that is supported by credible sources been identified?

### **Forward-Looking Statements**

This report may contain forward-looking statements within the meaning of Section 27A of the Securities Act of 1933 and Section 21E of the Securities Exchange Act of 1934, including statements related to our compliance efforts. These forward-looking statements can be identified by the use of forward-looking words, such as “may,” “could,” “should,” “estimate,” “project,” “forecast,” “intend,” “expect,” “anticipate,” “believe,” “target,” “plan” or other comparable words, or by discussions of strategy that may involve risks and uncertainties.

These forward-looking statements are subject to various risks, uncertainties, and assumptions, including, among other matters, our customers’ requirements to use certain suppliers, our suppliers’ responsiveness and cooperation with our due diligence efforts, our ability to implement improvements in our conflict minerals program and our ability to identify and mitigate related risks in our supply chain. If one or more of these or other risks materialize, actual results may vary materially from those expressed in or implied by the forward-looking statements. For a more complete discussion of these and other risk factors, see our other filings with the Securities and Exchange Commission (SEC), including our Annual Report on Form 10-K for the year ended December 31, 2022. We caution you not to place undue reliance on these forward-looking statements, which speak only as of the date of this report, and we undertake no obligation to update or revise any forward-looking statement, except to the extent required by applicable law.

The cautionary statements set forth above should be considered in connection with any subsequent written or oral forward-looking statements that we or persons acting on our behalf may issue. We caution readers not to place undue reliance on the statements, which speak only as of the date of this report. We do not undertake any obligation to review or confirm analysts' expectations or estimates or to release publicly any revisions to any forward-looking statement to reflect events or circumstances after the date of this report or to reflect the occurrence of unanticipated events, except as required by law.

**APPENDIX A**

<b>Metal</b>	<b>Standard Smelter Name</b>	<b>Smelter ID</b>	<b>Smelter Country</b>	<b>RMI Audit Status</b>
Gold	Abington Reldan Metals, LLC	CID002708	UNITED STATES OF AMERICA	Conformant
Gold	Advanced Chemical Company	CID000015	UNITED STATES OF AMERICA	Conformant
Gold	Agosi AG	CID000035	GERMANY	Conformant
Gold	Aida Chemical Industries Co., Ltd.	CID000019	JAPAN	Conformant
Gold	Al Etihad Gold Refinery DMCC	CID002560	UNITED ARAB EMIRATES	Conformant
Gold	Albino Mountinho Lda.	CID002760	PORTUGAL	Non-Conformant
Gold	Alexy Metals	CID003500	UNITED STATES OF AMERICA	Active
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	CID000041	UZBEKISTAN	Conformant
Gold	AngloGold Ashanti Corrego do Sitio Mineracao	CID000058	BRAZIL	Conformant
Gold	Argor-Heraeus S.A.	CID000077	SWITZERLAND	Conformant
Gold	Asahi Pretec Corp.	CID000082	JAPAN	Conformant
Gold	Asahi Refining Canada Ltd.	CID000924	CANADA	Conformant
Gold	Asahi Refining USA Inc.	CID000920	UNITED STATES OF AMERICA	Conformant
Gold	Asaka Riken Co., Ltd.	CID000090	JAPAN	Conformant
Gold	AU Traders and Refiners	CID002850	SOUTH AFRICA	Non-Conformant
Gold	Augmont Enterprises Private Limited	CID003461	INDIA	Active
Gold	Aurubis AG	CID000113	GERMANY	Conformant
Gold	Bangalore Refinery	CID002863	INDIA	Conformant
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	CID000128	PHILIPPINES	Conformant
Gold	Boliden AB	CID000157	SWEDEN	Conformant
Gold	C. Hafner GmbH + Co. KG	CID000176	GERMANY	Conformant
Gold	C.I Metales Procesados Industriales SAS	CID003421	COLOMBIA	Active
Gold	CCR Refinery - Glencore Canada Corporation	CID000185	CANADA	Conformant
Gold	Chimet S.p.A.	CID000233	ITALY	Conformant
Gold	Chugai Mining	CID000264	JAPAN	Conformant
Gold	Dongwu Gold Group	CID003663	CHINA	Non-Conformant
Gold	Dowa	CID000401	JAPAN	Conformant
Gold	DSC (Do Sung Corporation)	CID000359	KOREA, REPUBLIC OF	Conformant
Gold	Eco-System Recycling Co., Ltd. East Plant	CID000425	JAPAN	Conformant
Gold	Eco-System Recycling Co., Ltd. North Plant	CID003424	JAPAN	Conformant
Gold	Eco-System Recycling Co., Ltd. West Plant	CID003425	JAPAN	Conformant
Gold	Emirates Gold DMCC	CID002561	UNITED ARAB EMIRATES	Conformant
Gold	Fidelity Printers and Refiners Ltd.	CID002515	ZIMBABWE	Non-Conformant
Gold	Geib Refining Corporation	CID002459	UNITED STATES OF AMERICA	Conformant

Gold	GGC Gujrat Gold Centre Pvt. Ltd.	CID002852	INDIA	Active
Gold	Gold by Gold Colombia	CID003641	COLOMBIA	Conformant
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CID002243	CHINA	Conformant
Gold	Heimerle + Meule GmbH	CID000694	GERMANY	Conformant
Gold	Heraeus Germany GmbH Co. KG	CID000711	GERMANY	Conformant
Gold	Heraeus Metals Hong Kong Ltd.	CID000707	CHINA	Conformant
Gold	Industrial Refining Company	CID002587	BELGIUM	Non-Conformant
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CID000801	CHINA	Conformant
Gold	Ishifuku Metal Industry Co., Ltd.	CID000807	JAPAN	Conformant
Gold	Istanbul Gold Refinery	CID000814	TURKEY	Conformant
Gold	Italpreziosi	CID002765	ITALY	Conformant
Gold	Japan Mint	CID000823	JAPAN	Conformant
Gold	Jiangxi Copper Co., Ltd.	CID000855	CHINA	Conformant
Gold	JSC Ekaterinburg Non-Ferrous Metal Processing Plant	CID000927	RUSSIAN FEDERATION	Non-Conformant
Gold	JX Nippon Mining & Metals Co., Ltd.	CID000937	JAPAN	Conformant
Gold	Kaloti Precious Metals	CID002563	UNITED ARAB EMIRATES	Non-Conformant
Gold	Kazzinc	CID000957	KAZAKHSTAN	Conformant
Gold	Kennecott Utah Copper LLC	CID000969	UNITED STATES OF AMERICA	Conformant
Gold	KGHM Polska Miedz Spolka Akcyjna	CID002511	POLAND	Conformant
Gold	Kojima Chemicals Co., Ltd.	CID000981	JAPAN	Conformant
Gold	Korea Zinc Co., Ltd.	CID002605	KOREA, REPUBLIC OF	Conformant
Gold	Kyrgyzaltyn JSC	CID001029	KYRGYZSTAN	Non-Conformant
Gold	L'azurde Company For Jewelry	CID001032	SAUDI ARABIA	Non-Conformant
Gold	L'Orfebre S.A.	CID002762	ANDORRA	Conformant
Gold	LS-NIKKO Copper Inc.	CID001078	KOREA, REPUBLIC OF	Conformant
Gold	LT Metal Ltd.	CID000689	KOREA, REPUBLIC OF	Conformant
Gold	Materion	CID001113	UNITED STATES OF AMERICA	Conformant
Gold	Matsuda Sangyo Co., Ltd.	CID001119	JAPAN	Conformant
Gold	Metal Concentrators SA (Pty) Ltd.	CID003575	SOUTH AFRICA	Conformant
Gold	Metalor Technologies (Hong Kong) Ltd.	CID001149	CHINA	Conformant
Gold	Metalor Technologies (Singapore) Pte., Ltd.	CID001152	SINGAPORE	Conformant
Gold	Metalor Technologies (Suzhou) Ltd.	CID001147	CHINA	Conformant
Gold	Metalor Technologies S.A.	CID001153	SWITZERLAND	Conformant
Gold	Metalor USA Refining Corporation	CID001157	UNITED STATES OF AMERICA	Conformant
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	CID001161	MEXICO	Conformant
Gold	Mitsubishi Materials Corporation	CID001188	JAPAN	Conformant
Gold	Mitsui Mining and Smelting Co., Ltd.	CID001193	JAPAN	Conformant

Gold	MMTC-PAMP India Pvt., Ltd.	CID002509	INDIA	Conformant
Gold	Modeltech Sdn Bhd	CID002857	MALAYSIA	Non-Conformant
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	CID001220	TURKEY	Conformant
Gold	Navoi Mining and Metallurgical Combinat	CID001236	UZBEKISTAN	Conformant
Gold	NH Recytech Company	CID003189	KOREA, REPUBLIC OF	Conformant
Gold	Nihon Material Co., Ltd.	CID001259	JAPAN	Conformant
Gold	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	CID002779	AUSTRIA	Conformant
Gold	Ohura Precious Metal Industry Co., Ltd.	CID001325	JAPAN	Conformant
Gold	PAMP S.A.	CID001352	SWITZERLAND	Conformant
Gold	Planta Recuperadora de Metales SpA	CID002919	CHILE	Conformant
Gold	PT Aneka Tambang (Persero) Tbk	CID001397	INDONESIA	Conformant
Gold	PX Precinox S.A.	CID001498	SWITZERLAND	Conformant
Gold	Rand Refinery (Pty) Ltd.	CID001512	SOUTH AFRICA	Conformant
Gold	REMONDIS PMR B.V.	CID002582	NETHERLANDS	Conformant
Gold	Royal Canadian Mint	CID001534	CANADA	Conformant
Gold	SAAMP	CID002761	FRANCE	Conformant
Gold	SAFINA A.S.	CID002290	CZECHIA	Conformant
Gold	Sancus ZFS (L'Orfebre, SA)	CID003529	COLOMBIA	Conformant
Gold	SEMPSA Joyeria Plateria S.A.	CID001585	SPAIN	Conformant
Gold	Shandong Gold Smelting Co., Ltd.	CID001916	CHINA	Conformant
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CID001622	CHINA	Conformant
Gold	Shenzhen CuiLu Gold Co., Ltd.	CID002750	CHINA	Non-Conformant
Gold	Sichuan Tianze Precious Metals Co., Ltd.	CID001736	CHINA	Conformant
Gold	Solar Applied Materials Technology Corp.	CID001761	TAIWAN, PROVINCE OF CHINA	Conformant
Gold	Sumitomo Metal Mining Co., Ltd.	CID001798	JAPAN	Conformant
Gold	SungEel HiMetal Co., Ltd.	CID002918	KOREA, REPUBLIC OF	Conformant
Gold	T.C.A S.p.A	CID002580	ITALY	Conformant
Gold	Tanaka Kikinzoku Kogyo K.K.	CID001875	JAPAN	Conformant
Gold	Tokuriki Honten Co., Ltd.	CID001938	JAPAN	Conformant
Gold	TOO Tau-Ken-Altyn	CID002615	KAZAKHSTAN	Conformant
Gold	Torecom	CID001955	KOREA, REPUBLIC OF	Conformant
Gold	Umicore S.A. Business Unit Precious Metals Refining	CID001980	BELGIUM	Conformant
Gold	United Precious Metal Refining, Inc.	CID001993	UNITED STATES OF AMERICA	Conformant
Gold	Valcambi S.A.	CID002003	SWITZERLAND	Conformant
Gold	WEEEREFINING	CID003615	FRANCE	Active
Gold	Western Australian Mint (T/a The Perth Mint)	CID002030	AUSTRALIA	Conformant
Gold	WIELAND Edelmetalle GmbH	CID002778	GERMANY	Conformant
Gold	Yamakin Co., Ltd.	CID002100	JAPAN	Conformant

Gold	Yokohama Metal Co., Ltd.	CID002129	JAPAN	Conformant
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CID002224	CHINA	Conformant
Tantalum	5D Production OU	CID003926	ESTONIA	Non-Conformant
Tantalum	AMG Brasil	CID001076	BRAZIL	Conformant
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	CID000211	CHINA	Conformant
Tantalum	D Block Metals, LLC	CID002504	UNITED STATES OF AMERICA	Conformant
Tantalum	F&X Electro-Materials Ltd.	CID000460	CHINA	Conformant
Tantalum	FIR Metals & Resource Ltd.	CID002505	CHINA	Conformant
Tantalum	Global Advanced Metals Aizu	CID002558	JAPAN	Conformant
Tantalum	Global Advanced Metals Boyertown	CID002557	UNITED STATES OF AMERICA	Conformant
Tantalum	H.C. Starck Hermsdorf GmbH	CID002547	GERMANY	Conformant
Tantalum	H.C. Starck Inc.	CID002548	UNITED STATES OF AMERICA	Conformant
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CID002492	CHINA	Conformant
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CID002512	CHINA	Conformant
Tantalum	Jiangxi Tuohong New Raw Material	CID002842	CHINA	Conformant
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CID000914	CHINA	Conformant
Tantalum	Jiujiang Tanbre Co., Ltd.	CID000917	CHINA	Conformant
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CID002506	CHINA	Conformant
Tantalum	KEMET de Mexico	CID002539	MEXICO	Conformant
Tantalum	Metallurgical Products India Pvt., Ltd.	CID001163	INDIA	Conformant
Tantalum	Mineracao Taboca S.A.	CID001175	BRAZIL	Conformant
Tantalum	Mitsui Mining and Smelting Co., Ltd.	CID001192	JAPAN	Conformant
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CID001277	CHINA	Conformant
Tantalum	NPM Silmet AS	CID001200	ESTONIA	Conformant
Tantalum	QuantumClean	CID001508	UNITED STATES OF AMERICA	Conformant
Tantalum	Resind Industria e Comercio Ltda.	CID002707	BRAZIL	Conformant
Tantalum	RFH Yancheng Jinye New Material Technology Co., Ltd.	CID003583	CHINA	Conformant
Tantalum	Taki Chemical Co., Ltd.	CID001869	JAPAN	Conformant
Tantalum	TANIOBIS Co., Ltd.	CID002544	THAILAND	Conformant
Tantalum	TANIOBIS GmbH	CID002545	GERMANY	Conformant
Tantalum	TANIOBIS Japan Co., Ltd.	CID002549	JAPAN	Conformant
Tantalum	TANIOBIS Smelting GmbH & Co. KG	CID002550	GERMANY	Conformant
Tantalum	Telex Metals	CID001891	UNITED STATES OF AMERICA	Conformant
Tantalum	Ulba Metallurgical Plant JSC	CID001969	KAZAKHSTAN	Conformant
Tantalum	XIMEI RESOURCES (GUANGDONG) LIMITED	CID000616	CHINA	Conformant
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	CID002508	CHINA	Conformant
Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	CID001522	CHINA	Conformant



Tin	Alpha	CID000292	UNITED STATES OF AMERICA	Conformant
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CID000228	CHINA	Conformant
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CID003190	CHINA	Conformant
Tin	China Tin Group Co., Ltd.	CID001070	CHINA	Conformant
Tin	CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda	CID003486	BRAZIL	Conformant
Tin	CRM Synergies	CID003524	SPAIN	Conformant
Tin	CV Venus Inti Perkasa	CID002455	INDONESIA	Conformant
Tin	Dongguan CiEXPO Environmental Engineering Co., Ltd.	CID003356	CHINA	Non-Conformant
Tin	Dowa	CID000402	JAPAN	Conformant
Tin	DS Myanmar	CID003831	MYANMAR	Conformant
Tin	Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company	CID002572	VIET NAM	Non-Conformant
Tin	EM Vinto	CID000438	BOLIVIA (PLURINATIONAL STATE OF)	Conformant
Tin	Estanho de Rondonia S.A.	CID000448	BRAZIL	Conformant
Tin	Fabrica Auricchio Industria e Comercio Ltda.	CID003582	BRAZIL	Conformant
Tin	Fenix Metals	CID000468	POLAND	Conformant
Tin	Gejiu Kai Meng Industry and Trade LLC	CID000942	CHINA	Non-Conformant
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CID000538	CHINA	Conformant
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CID003116	CHINA	Conformant
Tin	HuiChang Hill Tin Industry Co., Ltd.	CID002844	CHINA	Conformant
Tin	Jiangxi New Nanshan Technology Ltd.	CID001231	CHINA	Conformant
Tin	Luna Smelter, Ltd.	CID003387	RWANDA	Conformant
Tin	Ma'anshan Weitai Tin Co., Ltd.	CID003379	CHINA	Conformant
Tin	Magnu's Minerai's Metais e Ligas Ltda.	CID002468	BRAZIL	Conformant
Tin	Malaysia Smelting Corporation (MSC)	CID001105	MALAYSIA	Conformant
Tin	Metallic Resources, Inc.	CID001142	UNITED STATES OF AMERICA	Conformant
Tin	Metallo Belgium N.V.	CID002773	BELGIUM	Conformant
Tin	Metallo Spain S.L.U.	CID002774	SPAIN	Conformant
Tin	Mineracao Taboca S.A.	CID001173	BRAZIL	Conformant
Tin	Minsur	CID001182	PERU	Conformant
Tin	Mitsubishi Materials Corporation	CID001191	JAPAN	Conformant
Tin	Modeltech Sdn Bhd	CID002858	MALAYSIA	Non-Conformant
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	CID001314	THAILAND	Conformant
Tin	O.M. Manufacturing Philippines, Inc.	CID002517	PHILIPPINES	Conformant
Tin	Operaciones Metalurgicas S.A.	CID001337	BOLIVIA (PLURINATIONAL STATE OF)	Conformant

Tin	Precious Minerals and Smelting Limited	CID003409	INDIA	Non-Conformant
Tin	PT Aries Kencana Sejahtera	CID000309	INDONESIA	Conformant
Tin	PT Artha Cipta Langgeng	CID001399	INDONESIA	Conformant
Tin	PT ATD Makmur Mandiri Jaya	CID002503	INDONESIA	Conformant
Tin	PT Babel Inti Perkasa	CID001402	INDONESIA	Conformant
Tin	PT Babel Surya Alam Lestari	CID001406	INDONESIA	Conformant
Tin	PT Bangka Serumpun	CID003205	INDONESIA	Conformant
Tin	PT Belitung Industri Sejahtera	CID001421	INDONESIA	Active
Tin	PT Bukit Timah	CID001428	INDONESIA	Conformant
Tin	PT Cipta Persada Mulia	CID002696	INDONESIA	Conformant
Tin	PT Menara Cipta Mulia	CID002835	INDONESIA	Conformant
Tin	PT Mitra Stania Prima	CID001453	INDONESIA	Conformant
Tin	PT Mitra Sukses Globalindo	CID003449	INDONESIA	Conformant
Tin	PT Prima Timah Utama	CID001458	INDONESIA	Conformant
Tin	PT Putera Sarana Shakti (PT PSS)	CID003868	INDONESIA	Conformant
Tin	PT Rajawali Rimba Perkasa	CID003381	INDONESIA	Conformant
Tin	PT Refined Bangka Tin	CID001460	INDONESIA	Conformant
Tin	PT Sariwiguna Binasentosa	CID001463	INDONESIA	Conformant
Tin	PT Stanindo Inti Perkasa	CID001468	INDONESIA	Conformant
Tin	PT Sukses Inti Makmur	CID002816	INDONESIA	Conformant
Tin	PT Timah Nusantara	CID001486	INDONESIA	Active
Tin	PT Timah Tbk Kundur	CID001477	INDONESIA	Conformant
Tin	PT Timah Tbk Mentok	CID001482	INDONESIA	Conformant
Tin	PT Tommy Utama	CID001493	INDONESIA	Conformant
Tin	Resind Industria e Comercio Ltda.	CID002706	BRAZIL	Conformant
Tin	Rui Da Hung	CID001539	TAIWAN, PROVINCE OF CHINA	Conformant
Tin	PT Bangka Prima Tin	CID002776	INDONESIA	Conformant
Tin	PT Rajehan Ariq	CID002593	INDONESIA	Conformant
Tin	CV Ayi Jaya	CID002570	INDONESIA	Conformant
Tin	PT Premium Tin Indonesia	CID000313	INDONESIA	Conformant
Tin	Super Ligas	CID002756	BRAZIL	Active
Tin	Thai Nguyen Mining and Metallurgy Co., Ltd.	CID002834	VIET NAM	Conformant
Tin	Thaisarco	CID001898	THAILAND	Conformant
Tin	Tin Smelting Branch of Yunnan Tin Co., Ltd.	CID002180	CHINA	Conformant
Tin	Tin Technology & Refining	CID003325	UNITED STATES OF AMERICA	Conformant
Tin	White Solder Metalurgia e Mineracao Ltda.	CID002036	BRAZIL	Conformant
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CID002158	CHINA	Conformant
Tin	Yunnan Yunfan Non-ferrous Metals Co., Ltd.	CID003397	CHINA	Non-Conformant
Tungsten	A.L.M.T. Corp.	CID000004	JAPAN	Conformant
Tungsten	Asia Tungsten Products Vietnam Ltd.	CID002502	VIET NAM	Conformant
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.	CID002513	CHINA	Conformant

Tungsten	China Molybdenum Tungsten Co., Ltd.	CID002641	CHINA	Conformant
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CID000258	CHINA	Conformant
Tungsten	Cronimet Brasil Ltda	CID003468	BRAZIL	Conformant
Tungsten	Fujian Ganmin RareMetal Co., Ltd.	CID003401	CHINA	Conformant
Tungsten	Fujian Xinlu Tungsten	CID003609	CHINA	Conformant
Tungsten	Ganzhou Haichuang Tungsten Co., Ltd.	CID002645	CHINA	Conformant
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	CID000875	CHINA	Conformant
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CID002315	CHINA	Conformant
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CID002494	CHINA	Conformant
Tungsten	Global Tungsten & Powders Corp.	CID000568	UNITED STATES OF AMERICA	Conformant
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CID000218	CHINA	Conformant
Tungsten	H.C. Starck Tungsten GmbH	CID002541	GERMANY	Conformant
Tungsten	HANNAE FOR T Co., Ltd.	CID003978	KOREA, REPUBLIC OF	Non-Conformant
Tungsten	Hunan Chenzhou Mining Co., Ltd.	CID000766	CHINA	Conformant
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.	CID000769	CHINA	Conformant
Tungsten	Japan New Metals Co., Ltd.	CID000825	JAPAN	Conformant
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CID002551	CHINA	Conformant
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CID002321	CHINA	Conformant
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CID002318	CHINA	Conformant
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CID002317	CHINA	Conformant
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CID002316	CHINA	Conformant
Tungsten	Jingmen Dewei GEM Tungsten Resources Recycling Co., Ltd.	CID003417	CHINA	Conformant
Tungsten	Kennametal Fallon	CID000966	UNITED STATES OF AMERICA	Conformant
Tungsten	Kennametal Huntsville	CID000105	UNITED STATES OF AMERICA	Conformant
Tungsten	KGETS Co., Ltd.	CID003388	KOREA, REPUBLIC OF	Conformant
Tungsten	Lianyou Metals Co., Ltd.	CID003407	TAIWAN, PROVINCE OF CHINA	Conformant
Tungsten	LLC Vostok	CID003643	RUSSIAN FEDERATION	Non-Conformant
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CID002319	CHINA	Conformant
Tungsten	Masan High-Tech Materials	CID002543	VIET NAM	Conformant
Tungsten	Niagara Refining LLC	CID002589	UNITED STATES OF AMERICA	Conformant
Tungsten	Philippine Chuangxin Industrial Co., Inc.	CID002827	PHILIPPINES	Conformant
Tungsten	Tungsten Vietnam Joint Stock Company	CID003993	VIET NAM	Conformant
Tungsten	TANIOBIS Smelting GmbH & Co. KG	CID002542	GERMANY	Conformant

Tungsten	Wolfram Bergbau und Hutten AG	CID002044	AUSTRIA	Conformant
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CID002320	CHINA	Conformant
Tungsten	Xiamen Tungsten Co., Ltd.	CID002082	CHINA	Conformant
Tungsten	Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.	CID002830	CHINA	Conformant
Tungsten	YUDU ANSHENG TUNGSTEN CO., LTD.	CID003662	CHINA	Non-Conformant