

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

Form SD

SPECIALIZED DISCLOSURE REPORT

**Herman Miller, Inc.**

(Exact Name of Registrant as Specified in Charter)

**Michigan**

(State or Other Jurisdiction  
of Incorporation)

**001-15141**

(Commission File No.)

**38-0837640**

(I.R.S. Employer  
Identification Number)

**855 East Main Avenue, P.O. Box 302, Zeeland, MI**

(Address of Principal Executive Offices)

**49464-0302**

(Zip Code)

**Jacqueline H. Rice**

**Senior Vice President, General Counsel**

Phone No. <**616-654-3423**>

(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:

[ x ] Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2019.

## Section 1 - Conflict Minerals Disclosure

### Items 1.01 and 1.02 Conflict Minerals Disclosure and Report; Exhibits

#### Conflict Minerals Disclosure

Herman Miller, Inc. is providing a Conflict Minerals Report as Exhibit 1.01 hereto, and it is publicly available at <http://investors.hermanmiller.com/sec-filings>. Among other things, the Conflict Minerals Report includes a discussion of the Company's Reasonable Country of Origin Inquiry ("RCOI") designed to provide a reasonable basis for us to determine the geographic source of tin, tantalum, tungsten, and gold in our products.

#### Section 2 - Exhibits

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

## 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.

HERMAN MILLER, INC.

Date: June 11, 2020

/s/ Jacqueline H. Rice

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Jacqueline H. Rice

Senior Vice President and General Counsel

**Herman Miller, Inc.**  
**Conflict Minerals Report**  
**for the Year Ended December 31, 2019**

This conflict minerals report for the year ended December 31, 2019 is presented to comply with Rule 13p-1 under the Securities Exchange Act of 1934 (the “Rule”). The Securities and Exchange Commission (“SEC”) adopted the Rule to implement reporting and disclosure requirements related to conflict minerals as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act). The Rule imposes certain reporting obligations on SEC registrants whose manufactured products contain conflict minerals which are necessary to the functionality or production of their products. Conflict minerals are defined as cassiterite, columbite-tantalite, gold, wolframite, and their derivatives, which are limited to tin, tantalum, tungsten, and gold (“3TG”). These requirements apply to registrants whatever the geographic origin of the conflict minerals and whether or not they fund armed conflict. Without limitation, they apply whether or not the geographic origin of the 3TG is the Democratic Republic of the Congo or an adjoining country (the “Covered Countries”).

## **1. Company Overview**

This report has been prepared by management of Herman Miller, Inc. (“Herman Miller,” the “Company,” “we,” “us,” or “our”). The information includes the activities of all majority-owned subsidiaries and variable interest entities that are required to be consolidated. It does not include the activities of variable interest entities that are not required to be consolidated.

The Company researches, designs, manufactures, and distributes interior furnishings, including modular furniture systems, seating, freestanding furniture, storage, casegoods, healthcare products and accessories for use in various environments including office, healthcare, educational, and residential settings, and provides related services that support organizations and individuals all over the world. We conducted an analysis of our products and found that 3TG may be found in some of our products, however, the amount and value of 3TG in a given product is generally de minimis compared to size and value of the product overall.

## **Supply Chain**

We rely on our direct (also referred to as in-scope) suppliers to provide information on the origin of the 3TG contained in components and materials supplied to us, including sources of 3TG that are supplied to them from lower tier suppliers. Although our Terms and Conditions of Purchase require compliance with our Company’s Conflict Minerals Policy, contracts with our direct suppliers are frequently in force for multiple years. As we enter into new contracts, or our contracts renew, we will require direct suppliers to:

- (1) not sell us any products that contain 3TG from any Covered Country that fund armed conflict,
- (2) undertake diligence and investigation necessary to ensure products meet the prior requirement, and
- (3) provide us with certificates and other evidence of compliance upon request.

Given the size and geographic breadth of our supply base, it would be extremely difficult to survey all our suppliers. We apply a risk-based approach, focusing on those direct suppliers who source products that may contain 3TG. We have assessed our industry to confirm that this risk-based approach is consistent with our peer companies. It is also consistent with the framework outlined in the Organization for Economic Co-operation and Development (“OECD”) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (“OECD Guidance”) and the related Supplements for 3TG.

## **Conflict Minerals Policy**

In 2012, the Company adopted a conflict minerals policy which is publicly available on our website at <https://www.hermanmiller.com/legal/conflict-minerals/>

## **2. Conflict Minerals Compliance Process**

### **2.1 Compliance Framework**

Where we deemed it appropriate, we referenced and/or implemented the OECD Guidance.

### **2.2 Management Systems**

#### **Conflict Minerals Policy**

As described above, we have adopted a conflict minerals policy, which is posted on our website.

#### **Internal Team**

The Company has established a cross-functional management team relating to conflict minerals, with oversight provided by our General Counsel. The team is comprised of subject matter experts from relevant functions (e.g., supply chain, engineering, and legal), and is responsible for implementing our conflict minerals compliance strategy. Our supply chain manager leads the work and acts as the conflict minerals program manager. Relevant senior management is briefed about the results of our due diligence efforts on a regular basis.

#### **Control Systems**

As we do not typically have a direct relationship with 3TG smelters and refiners, we engage and actively cooperate with other manufacturers in the institutional furniture industry and other relevant sectors. For example, we participate in the Business & Institutional Furniture Manufacturers Association (“BIFMA”) industry-wide initiatives to identify upstream actors in the supply chain. The Company is also a member of the Manufacturers Alliance for Productivity and Innovation (“MAPI”), an organization that develops and shares best practices on key issues facing manufacturers, such as conflict minerals. Our controls include but are not limited to (1) our Code of Conduct, which outlines expected behaviors for all Herman Miller employees; (2) our Supplier Code of Conduct; and (3) our form Terms and Conditions of Purchase.

#### **Grievance Mechanism**

We have longstanding grievance mechanisms whereby employees and suppliers can report violations of the Company’s policies, including our conflict minerals, via our Whistleblower program located on our website <https://www.hermanmiller.com/legal/whistleblower-policy/>.

#### **Records Maintenance**

We retain all relevant documentation from our RCOI and due diligence measures.

### **2.3 Identify and Assess Risk in the Supply Chain**

Because of the depth, breadth, and constant evolution of our supply chain, it is difficult for us to identify actors upstream from our direct suppliers. We identified approximately 73 in-scope suppliers who provide materials or components that may contain 3TG. We rely on these suppliers to provide us with information on if their parts or products contain 3TG and, if so, about the source. Our direct suppliers similarly rely upon information provided by their suppliers.

### **2.4 Design and Implement a Strategy to Respond to Risks**

Herman Miller has an approved risk management plan, through which the conflict minerals program is implemented, managed and monitored. Updates to this risk assessment are provided regularly to relevant senior management. As described above, we participate in BIFMA industry-wide initiatives to identify upstream actors in the supply chain.

As part of our risk management efforts, we undertook several activities with our direct suppliers to help ensure they understood our expectations. We provided each supplier a copy of our conflict minerals policy and requested they complete a template survey (as further described in Section 3 below) for purposes of conflict minerals tracking. We answered their questions and provided clarification as needed. We shared training materials available from the Conflict-Free Sourcing Initiative. Finally, we reviewed supplier-specific responses and followed up where additional detail was needed.

### **2.5 Report on Supply Chain Due Diligence**

This conflict minerals report is being filed with the SEC as an exhibit to our specialized disclosure report on Form SD and is available on our website at <http://investors.hermanmiller.com/sec-filings>.

### **3. Reasonable Country of Origin Inquiry and Results**

#### **Supplier Surveys**

For our Reasonable Country of Origin Inquiry, we conducted a survey of our direct suppliers using a template survey developed by the Electronic Industry Citizenship Coalition® (EICC®) and the Global e-Sustainability Initiative (GeSI), known as the Responsible Minerals Initiative (RMI) Reporting. The survey was developed to facilitate disclosure and communication of information regarding smelters that provide material in a company's supply chain. It includes questions regarding a company's conflict-free policy, engagement with its direct suppliers, and a listing of the smelters the company and its suppliers use. In addition, the survey requests detail of the origin of conflict minerals included in their products, as well as a description of their due diligence. Written instructions and recorded training illustrating the use of the tool is available on EICC's website.

#### **Survey Responses**

If a supplier did not respond to our initial survey, we made at least two follow-up inquiries. We reviewed the responses against criteria developed to determine where additional engagement is required. These criteria included untimely or incomplete responses as well as inconsistencies within the data reported in the survey. We worked directly with those suppliers to provide revised responses.

Several direct suppliers provided information indicating that one or more smelters or refiners identified in their supply chain are in one or more of the Covered Countries or appear on the Responsible Mineral Initiative's ("RMI") list of smelters and refiners that are certified as compliant with the RMI Conflict-Free Smelter Program assessment protocols; we list those smelters and refiners on Attachment A to this Report. However, because most direct suppliers complete the survey at a company level (rather than the product level), there was no reliable information indicating that any of the 3TG potentially obtained from these smelters or refiners was contained in materials, components or parts that the suppliers supplied to us or to validate that any of these smelters or refiners are in our supply chain.

Some direct suppliers provided information indicating that one or more other smelters or refiners appeared in their supply chain but are not located in one or more of the Covered Countries. As to these smelters and refiners, we reviewed to determine whether they appeared on the RMI list of smelters or the U.S. Department of Commerce list of known facilities that process 3TG. That exercise indicated that there were known smelters or refiners purportedly in our supply chain that are not on the RMI list of smelters and refiners that are certified as compliant with the RMI Conflict-Free Smelter Program assessment protocols. With respect to these smelters and refiners, we conducted internet searches to confirm whether any operate in, or process minerals sourced from, one or more of the Covered Countries. We did not find evidence that any such smelters or refiners operate in or process minerals sourced from one or more of the Covered Countries. Regardless, there was no reliable information indicating that any of the 3TG that these suppliers may have obtained from these smelters or refiners was contained in materials, components or parts that the suppliers supplied to us or to validate that any of these smelters or refiners are in our supply chain.

#### **Conclusions**

We conducted our RCOI in good faith, and we believe that such inquiry was reasonable to allow us to make our determination. After reviewing the results of our RCOI, we determined that we had reason to believe that 3TG necessary for the functionality or production of our products from certain suppliers may have originated in a Covered Country during 2019, all within the meaning of the Rule. Therefore, we determined that the Rule required us to conduct due diligence regarding the source of such 3TG. As to responses from other suppliers, however, we determined that we had no reason to believe that 3TG necessary for the functionality or production of our products from those suppliers may have originated in a Covered Country during 2019, all within the meaning of the Rule.

### **4. Due Diligence and Results**

#### **Due Diligence**

Considering the responses to our inquiries from certain suppliers that contained information indicating that 3TG were sourced from Covered Countries, we completed due diligence measures.

Initially, we compared the facilities that the suppliers identified as in one or more of the Covered Countries or appearing on the RMI list of certified smelters and refiners to those certified as compliant with the RMI Conflict-Free Smelter Program assessment protocols as of March 4, 2019. We confirmed that all such smelters or refiners identified by the direct suppliers also appeared on the list of participants in the RMI Conflict-Free Smelter Program. Given these results, we did not undertake further due diligence measures, consistent with the OECD Guidance.

#### **Conclusion**

We conducted our due diligence in good faith. After reviewing the results of our due diligence, we did not find any evidence to suggest that any of the 3TG in our supply chain that is necessary for the functionality or production of our products and that may have originated in a Covered Country (a) funds any armed conflict in the Covered Countries or (b) is actually contained in components or parts that our suppliers have supplied to us.

## **5. Steps to be Taken to Mitigate Risk**

We intend to take the following steps to improve our conflict minerals program to further mitigate any risk that the necessary 3TG in our products could benefit armed groups in the DRC or adjoining countries:

- a. Include a conflict minerals clause in new or renewed supplier contracts.
- b. Continue to work with our employees and suppliers to increase awareness of the issue, increase the response rate and improve the content of the supplier survey responses.
- c. Engage any of our suppliers found to be supplying us with 3TG from sources from the DRC or any adjoining country that they cannot demonstrate are “DRC conflict free” to establish an alternative source of 3TG outside of those countries.
- d. Work with the BIFMA and other groups to define and improve best practices and build leverage over the supply chain in accordance with the OECD Guidance.

## Smelters and Refiners

The following facilities have been reported to us by our suppliers as part of their supply chain for Conflict Minerals:

| <b>Metal</b> | <b>Smelter</b>  | <b>Country</b>       |
|--------------|---|----------------------|
| Gold         | 8853 S.p.A.   | Italy                |
| Gold         | Abington Reldan Metals, LLC                                   | United States        |
| Gold         | Advanced Chemical Company                                     | United States        |
| Gold         | African Gold Refinery   | Uganda               |
| Gold         | Aida Chemical Industries Co., Ltd.                            | Japan                |
| Gold         | Al Etihad Gold Refinery DMCC                                  | United Arab Emirates |
| Gold         | Allgemeine Gold-und Silberscheideanstalt A.G.                 | Germany              |
| Gold         | Almalyk Mining and Metallurgical Complex (AMMC)               | Uzbekistan           |
| Gold         | AngloGold Ashanti Corrego do Sitio Mineracao                  | Brazil               |
| Gold         | Argor-Heraeus SA  | Switzerland          |
| Gold         | Asahi Pretec Corp.  | Japan                |
| Gold         | Asahi Refining Canada Limited                                 | Canada               |
| Gold         | Asahi Refining USA Inc.                                       | United States        |
| Gold         | Asaka Riken Co., Ltd.   | Japan                |
| Gold         | Atasay Kuyumculuk Sanayi Ve Ticaret A.S.                      | Turkey               |
| Gold         | AU Traders and Refiners                                       | South Africa         |
| Gold         | Aurubis AG  | Germany              |
| Gold         | Bangalore Refinery  | India                |
| Gold         | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | Philippines          |
| Gold         | Boliden AB  | Sweden               |
| Gold         | C. Hafner GmbH + Co. KG                                       | Germany              |
| Gold         | Caridad   | Mexico               |
| Gold         | CCR Refinery - Glencore Canada Corporation                    | Canada               |
| Gold         | Cendres + Metaux S.A.   | Switzerland          |
| Gold         | Chimet S.p.A.   | Italy                |
| Gold         | Chugai Mining   | Japan                |
| Gold         | Daejin Indus Co., Ltd.  | Korea, Republic Of   |
| Gold         | Daye Non-Ferrous Metals Mining Ltd.                           | China                |
| Gold         | Degussa Sonne / Mond Goldhandel GmbH                          | Germany              |
| Gold         | Dijllah Gold Refinery FZC                                     | United Arab Emirates |
| Gold         | DODUCO Contacts and Refining GmbH                             | Germany              |
| Gold         | Dowa  | Japan                |
| Gold         | DS PRETECH Co., Ltd.  | Korea, Republic Of   |
| Gold         | DSC (Do Sung Corporation)                                     | Korea, Republic Of   |
| Gold         | Eco-System Recycling Co., Ltd.                                | Japan                |
| Gold         | Eco-System Recycling Co., Ltd. North Plant                    | Japan                |
| Gold         | Eco-System Recycling Co., Ltd. West Plant                     | Japan                |
| Gold         | Emirates Gold DMCC  | United Arab Emirates |
| Gold         | Fidelity Printers and Refiners Ltd.                           | Zimbabwe             |
| Gold         | GCC Gujrat Gold Centre Pvt. Ltd.                              | India                |
| Gold         | Geib Refining Corporation                                     | United States        |
| Gold         | Gold Refinery of Zijin Mining Group Co., Ltd.                 | China                |
| 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 | HeeSung Metal Ltd.  | Korea, Republic Of   |
| Gold | Heimerle + Meule GmbH   | Germany              |
| Gold | Heraeus Ltd. Hong Kong  | China                |
| Gold | Heraeus Precious Metals GmbH & Co. KG                           | Germany              |
| Gold | Hunan Chenzhou Mining Co., Ltd.                                 | China                |
| Gold | Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd.             | China                |
| Gold | HwaSeong CJ CO., LTD.   | Korea, Republic Of   |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | China                |
| Gold | Ishifuku Metal Industry Co., Ltd.                               | Japan                |
| Gold | Istanbul Gold Refinery  | Turkey               |
| Gold | Italpreziosi  | Italy                |
| Gold | Japan Mint  | Japan                |
| Gold | Jiangxi Copper Co., Ltd.  | China                |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant             | Russian Federation   |
| Gold | JSC Uralelectromed  | Russian Federation   |
| Gold | JX Nippon Mining & Metals Co., Ltd.                             | Japan                |
| Gold | Kaloti Precious Metals  | United Arab Emirates |
| Gold | Kazakhmys Smelting LLC  | Kazakhstan           |
| Gold | Kazzinc   | Kazakhstan           |
| Gold | Kennecott Utah Copper LLC                                       | United States        |
| Gold | KGHM Polska Miedz Spolka Akcyjna                                | Poland               |
| Gold | Kojima Chemicals Co., Ltd.                                      | Japan                |
| Gold | Korea Zinc Co., Ltd.  | Korea, Republic Of   |
| Gold | Kyrgyzaltyn JSC   | Kyrgyzstan           |
| Gold | Kyshtym Copper-Electrolytic Plant ZAO                           | Russian Federation   |
| Gold | L'azurde Company For Jewelry                                    | Saudi Arabia         |
| Gold | Lingbao Gold Co., Ltd.  | China                |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd.                      | China                |
| Gold | L'Orfebre S.A.  | Andorra              |
| Gold | LS-NIKKO Copper Inc.  | Korea, Republic Of   |
| Gold | Luoyang Zijin Yinhui Gold Refinery Co., Ltd.                    | China                |
| Gold | Marsam Metals   | Brazil               |
| Gold | Materion  | United States        |
| Gold | Matsuda Sangyo Co., Ltd.  | Japan                |
| Gold | Metalor Technologies (Hong Kong) Ltd.                           | China                |
| Gold | Metalor Technologies (Singapore) Pte., Ltd.                     | Singapore            |
| Gold | Metalor Technologies (Suzhou) Ltd.                              | China                |
| Gold | Metalor Technologies S.A.                                       | Switzerland          |
| Gold | Metalor USA Refining Corporation                                | United States        |
| Gold | Metalurgica Met-Mex Penoles S.A. De C.V.                        | Mexico               |
| Gold | Mitsui Mining and Smelting Co., Ltd.                            | Japan                |
| Gold | MMTC-PAMP India Pvt., Ltd.                                      | India                |
| Gold | Modeltech Sdn Bhd   | Malaysia             |
| Gold | Morris and Watson   | New Zealand          |
| Gold | Morris and Watson Gold Coast                                    | Australia            |
| Gold | Moscow Special Alloys Processing Plant                          | Russian Federation   |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.S.                          | Turkey               |
| Gold | Navoi Mining and Metallurgical Combinat                         | Uzbekistan           |
| Gold | NH Recytech Company   | Korea, Republic Of   |
| Gold | Nihon Material Co., Ltd.  | Japan                |
| Gold | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH     | Austria              |
| Gold | Ohura Precious Metal Industry Co., Ltd.                         | Japan                |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant"         | Russian Federation   |



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|------|--|--------------------|
| Gold | OJSC Novosibirsk Refinery                                    | Russian Federation |
| Gold | PAMP S.A.  | Switzerland        |
| Gold | Pease & Curren   | United States      |
| Gold | Penglai Penggang Gold Industry Co., Ltd.                     | China              |
| Gold | Planta Recuperadora de Metales SpA                           | Chile              |
| Gold | Prioksky Plant of Non-Ferrous Metals                         | Russian Federation |
| Gold | PT Aneka Tambang (Persero) Tbk                               | Indonesia          |
| Gold | PX Precinox S.A.   | Switzerland        |
| Gold | QG Refining, LLC   | United States      |
| Gold | Rand Refinery (Pty) Ltd.                                     | South Africa       |
| Gold | Refinery of Seemine Gold Co., Ltd.                           | China              |
| Gold | Remondis Argentia B.V.                                       | Netherlands        |
| Gold | Republic Metals Corporation                                  | United States      |
| Gold | Royal Canadian Mint  | Canada             |
| Gold | SAAMP  | France             |
| Gold | Sabin Metal Corp.  | United States      |
| Gold | Safimet S.p.A  | Italy              |
| Gold | SAFINA A.S.  | Czech Republic     |
| Gold | Sai Refinery   | India              |
| Gold | Samduck Precious Metals                                      | Korea, Republic Of |
| Gold | Samwon Metals Corp.  | Korea, Republic Of |
| Gold | SAXONIA Edelmetalle GmbH                                     | Germany            |
| Gold | SEMPSA Joyeria Plateria S.A.                                 | Spain              |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd.      | China              |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.            | China              |
| Gold | Sichuan Tianze Precious Metals Co., Ltd.                     | China              |
| Gold | Singway Technology Co., Ltd.                                 | Taiwan             |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals         | Russian Federation |
| Gold | Solar Applied Materials Technology Corp.                     | Taiwan             |
| Gold | State Research Institute Center for Physical Sciences & Tech | Lithuania          |
| Gold | Sudan Gold Refinery  | Sudan              |
| Gold | Sumitomo Metal Mining Co., Ltd.                              | Japan              |
| Gold | SungEel HiMetal Co., Ltd.                                    | Korea, Republic Of |
| Gold | T.C.A S.p.A  | Italy              |
| Gold | Tanaka Kikinzoku Kogyo K.K.                                  | Japan              |
| Gold | The Refinery of Shandong Gold Mining Co., Ltd.               | China              |
| Gold | Tokuriki Honten Co., Ltd.                                    | Japan              |
| Gold | Tongling Nonferrous Metals Group Co., Ltd.                   | China              |
| Gold | Tony Goetz NV  | Belgium            |
| Gold | TOO Tau-Ken-Altyn  | Kazakhstan         |
| Gold | Torecom  | Korea, Republic Of |
| Gold | Umicore Brasil Ltda.   | Brazil             |
| Gold | Umicore Precious Metals Thailand                             | Thailand           |
| Gold | Umicore S.A. Business Unit Precious Metals Refining          | Belgium            |
| Gold | United Precious Metal Refining, Inc.                         | United States      |
| Gold | Universal Precious Metals Refining Zambia                    | Zambia             |
| Gold | Valcambi S.A.  | Switzerland        |
| Gold | Western Australian Mint (T/a The Perth Mint)                 | Australia          |
| Gold | WIELAND Edelmetalle GmbH                                     | Germany            |
| Gold | Yamakin Co., Ltd.  | Japan              |
| Gold | Yokohama Metal Co., Ltd.                                     | Japan              |
| Gold | Yunnan Copper Industry Co., Ltd.                             | China              |
| Gold | Zhongkuang Gold Industry Co., Ltd.                           | China              |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation          | China              |

|          |   |                    |
|----------|---|--------------------|
| Tantalum | Changsha South Tantalum Niobium Co., Ltd.                         | China              |
| Tantalum | Conghua Tantalum and Niobium Smeltry                              | China              |
| Tantalum | CP Metals Inc.  | United States      |
| Tantalum | D Block Metals, LLC   | United States      |
| Tantalum | Exotech Inc.  | United States      |
| Tantalum | F&X Electro-Materials Ltd.  | China              |
| Tantalum | FIR Metals & Resource Ltd.  | China              |
| Tantalum | Global Advanced Metals Aizu                                       | Japan              |
| Tantalum | Global Advanced Metals Boyertown                                  | United States      |
| Tantalum | Guangdong Zhiyuan New Material Co., Ltd.                          | China              |
| Tantalum | H.C. Starck Co., Ltd.   | Thailand           |
| Tantalum | H.C. Starck Hermsdorf GmbH  | Germany            |
| Tantalum | H.C. Starck Inc.  | United States      |
| Tantalum | H.C. Starck Ltd.  | Japan              |
| Tantalum | H.C. Starck Tantalum and Niobium GmbH                             | Germany            |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd.                 | China              |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd.                      | China              |
| Tantalum | Jiangxi Tuohong New Raw Material                                  | China              |
| Tantalum | Jiujiang Janny New Material Co., Ltd.                             | China              |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd.                       | China              |
| Tantalum | Jiujiang Nonferrous Metals Smelting Company Limited               | China              |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd.                     | China              |
| Tantalum | KEMET Blue Metals   | Mexico             |
| Tantalum | KEMET Blue Powder   | United States      |
| Tantalum | LSM Brasil S.A.   | Brazil             |
| Tantalum | Metallurgical Products India Pvt., Ltd.                           | India              |
| Tantalum | Mineracao Taboca S.A.   | Brazil             |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd.                        | China              |
| Tantalum | NPM Silmet AS   | Estonia            |
| Tantalum | Power Resources Ltd.  | Macedonia          |
| Tantalum | QuantumClean  | United States      |
| Tantalum | Resind Industria e Comercio Ltda.                                 | Brazil             |
| Tantalum | RFH Tantalum Smeltery Co., Ltd.                                   | China              |
| Tantalum | Solikamsk Magnesium Works OAO                                     | Russian Federation |
| Tantalum | Taki Chemical Co., Ltd.   | Japan              |
| Tantalum | Telex Metals  | United States      |
| Tantalum | Ulba Metallurgical Plant JSC                                      | Kazakhstan         |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd.                     | China              |
| Tin      | Alpha   | United States      |
| Tin      | An Vinh Joint Stock Mineral Processing Company                    | Viet Nam           |
| Tin      | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.                 | China              |
| Tin      | Chifeng Dajingzi Tin Industry Co., Ltd.                           | China              |
| Tin      | China Tin (Hechi)   | China              |
| Tin      | CV Ayi Jaya   | Indonesia          |
| Tin      | CV Dua Sekawan  | Indonesia          |
| Tin      | CV Gita Pesona  | Indonesia          |
| Tin      | CV Serumpun Sebalai   | Indonesia          |
| Tin      | CV Tiga Sekawan   | Indonesia          |
| Tin      | CV United Smelting  | Indonesia          |
| Tin      | CV Venus Inti Perkasa   | Indonesia          |
| Tin      | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy | Viet Nam           |
| Tin      | EM Vinto  | Bolivia            |
| Tin      | Estanho de Rondonia S.A.  | Brazil             |

|     |  |               |
|-----|--|---------------|
| Tin | Fenix Metals                                     | Poland        |
| 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         |
| Tin | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.   | China         |
| Tin | Gejiu Zili Mining And Metallurgy Co., Ltd.       | China         |
| Tin | Guangdong Hanhe Non-Ferrous Metal Co., Ltd.      | China         |
| Tin | Guanyang Guida Nonferrous Metal Smelting Plant   | China         |
| Tin | HuiChang Hill Tin Industry Co., Ltd.             | China         |
| Tin | Huichang Jinshunda Tin Co., Ltd.                 | China         |
| Tin | Jiangxi New Nanshan Technology Ltd.              | China         |
| Tin | Luna Smelter, Ltd.                               | Rwanda        |
| Tin | Ma'anshan Weitai Tin Co., Ltd.                   | China         |
| Tin | Magnu's Minerais Metais e Ligas Ltda.            | Brazil        |
| Tin | Malaysia Smelting Corporation (MSC)              | Malaysia      |
| Tin | Melt Metais e Ligas S.A.                         | Brazil        |
| Tin | Metallic Resources, Inc.                         | United States |
| Tin | Metallo Belgium N.V.                             | Belgium       |
| Tin | Metallo Spain S.L.U.                             | Spain         |
| Tin | Mineração Taboca S.A.                            | Brazil        |
| Tin | Minsur   | Peru          |
| Tin | Mitsubishi Materials Corporation                 | Japan         |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company | Viet Nam      |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd.          | Thailand      |
| Tin | O.M. Manufacturing Philippines, Inc.             | Philippines   |
| Tin | Operaciones Metalurgical S.A.                    | Bolivia       |
| Tin | Pongpipat Company Limited                        | Myanmar       |
| Tin | Precious Minerals and Smelting Limited           | India         |
| Tin | PT Aries Kencana Sejahtera                       | Indonesia     |
| Tin | PT Artha Cipta Langgeng                          | Indonesia     |
| Tin | PT ATD Makmur Mandiri Jaya                       | Indonesia     |
| Tin | PT Babel Inti Perkasa                            | Indonesia     |
| Tin | PT Babel Surya Alam Lestari                      | Indonesia     |
| Tin | PT Bangka Prima Tin                              | Indonesia     |
| Tin | PT Bangka Serumpun                               | Indonesia     |
| Tin | PT Bangka Tin Industry                           | Indonesia     |
| Tin | PT Belitung Industri Sejahtera                   | Indonesia     |
| Tin | PT Bukit Timah                                   | Indonesia     |
| Tin | PT DS Jaya Abadi                                 | Indonesia     |
| Tin | PT Inti Stania Prima                             | Indonesia     |
| Tin | PT Karimun Mining                                | Indonesia     |
| Tin | PT Kijang Jaya Mandiri                           | Indonesia     |
| Tin | PT Lautan Harmonis Sejahtera                     | Indonesia     |
| Tin | PT Menara Cipta Mulia                            | Indonesia     |
| Tin | PT Mitra Stania Prima                            | Indonesia     |
| Tin | PT Panca Mega Persada                            | Indonesia     |
| Tin | PT Prima Timah Utama                             | Indonesia     |
| Tin | PT Rajawali Rimba Perkasa                        | Indonesia     |
| Tin | PT Refined Bangka Tin                            | Indonesia     |
| Tin | PT Sariwiguna Binasentosa                        | Indonesia     |
| Tin | PT Stanindo Inti Perkasa                         | Indonesia     |
| Tin | PT Sukses Inti Makmur                            | Indonesia     |
| Tin | PT Sumber Jaya Indah                             | Indonesia     |
| Tin | PT Timah   | Indonesia     |

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| Tin      | PT Timah (Persero) Tbk Mentok                                 | Indonesia          |
| Tin      | PT Tinindo Inter Nusa   | Indonesia          |
| Tin      | PT Tirus Putra Mandiri  | Indonesia          |
| Tin      | PT Tommy Utama  | Indonesia          |
| Tin      | Resind Indústria e Comércio Ltda.                             | Brazil             |
| Tin      | Rui Da Hung   | Taiwan             |
| Tin      | Soft Metais Ltda.   | Brazil             |
| Tin      | Thai Nguyen Mining and Metallurgy Co., Ltd.                   | Viet Nam           |
| Tin      | Thaisarco   | Thailand           |
| Tin      | Tin Technology & Refining                                     | United States      |
| Tin      | Tuyen Quang Non-Ferrous Metals Joint Stock Company            | Viet Nam           |
| Tin      | White Solder Metalurgia e Mineracao Ltda.                     | Brazil             |
| Tin      | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.                 | China              |
| Tin      | Yunnan Tin Company, Ltd.                                      | China              |
| Tin      | Yunnan Yunfan Non-ferrous Metals Co., Ltd.                    | China              |
| Tungsten | A.L.M.T. Corp.  | Japan              |
| Tungsten | ACL Metais Eireli   | Brazil             |
| Tungsten | Albasteel Industria e Comercio de Ligas Para Fundicao Ltd.    | Brazil             |
| Tungsten | Asia Tungsten Products Vietnam Ltd.                           | Viet Nam           |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd.                  | China              |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd.                          | China              |
| Tungsten | Fujian Ganmin RareMetal Co., Ltd.                             | China              |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd.                              | China              |
| Tungsten | Ganzhou Haichuang Tungsten Co., Ltd.                          | China              |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd.                   | China              |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd.                       | China              |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd.                            | China              |
| Tungsten | Global Tungsten & Powders Corp.                               | United States      |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd.                          | China              |
| Tungsten | H.C. Starck GmbH  | Germany            |
| Tungsten | H.C. Starck Smelting GmbH & Co. KG                            | Germany            |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji               | China              |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd.                   | China              |
| Tungsten | Hunan Litian Tungsten Industry Co., Ltd.                      | China              |
| Tungsten | Hydrometallurg, JSC   | Russian Federation |
| Tungsten | Japan New Metals Co., Ltd.                                    | Japan              |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd.               | China              |
| Tungsten | Jiangxi Dayu Longxintai Tungsten Co., Ltd.                    | China              |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd.                            | China              |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.         | China              |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | China              |
| Tungsten | Jiangxi Xincheng Tungsten Industry Co., Ltd.                  | China              |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd.                           | China              |
| Tungsten | JSC "Kirovgrad Hard Alloys Plant"                             | Russian Federation |
| Tungsten | Kennametal Fallon   | United States      |
| Tungsten | Kennametal Huntsville   | United States      |
| Tungsten | KGETS Co., Ltd.   | Korea, Republic Of |
| Tungsten | Lianyou Metals Co., Ltd.                                      | Taiwan             |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd.                               | China              |
| Tungsten | Masan Tungsten Chemical LLC (MTC)                             | Viet Nam           |
| Tungsten | Moliren Ltd.  | Russian Federation |
| Tungsten | Niagara Refining LLC  | United States      |
| Tungsten | Philippine Chuangxin Industrial Co., Inc.                     | Philippines        |
| Tungsten | South-East Nonferrous Metal Company Limited of Hengyang City  | China              |

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| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd.                         | Viet Nam           |
| Tungsten | Unecha Refractory metals plant                              | Russian Federation |
| Tungsten | Wolfram Bergbau und Hutten AG                               | Austria            |
| Tungsten | Woltech Korea Co., Ltd.                                     | Korea, Republic Of |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd.                            | China              |
| Tungsten | Xiamen Tungsten Co., Ltd.                                   | China              |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd. | China              |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd.                   | China              |