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

FORM SD

SPECIALIZED DISCLOSURE REPORT

AMERICAN OUTDOOR BRANDS CORPORATION

(Exact name of registrant as specified in its charter)

NEVADA
(State or other jurisdiction of
incorporation or organization)

001-31552
(Commission
File Number)

87-0543688
(IRS Employer
Identification No.)

**2100 Roosevelt Avenue,
Springfield, Massachusetts**
(Address of principal executive offices)

01104
(Zip code)

Robert J. Cicero Sr. Vice President, General Counsel, Chief Compliance Officer, and Secretary – (800) 331-0852
(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, 2019.

Section 1 Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

A copy of American Outdoor Brands Corporation Conflict Minerals Report is filed as Exhibit 1.01 hereto and is publicly available at www.aob.com/conflictmineralsreport. The content of our website as referred to in this Form SD is included for general information only and is not incorporated by reference into this Form SD.

Item 1.02 Exhibits

Exhibit 1.01 Conflict Minerals Report

Section 2 Exhibits

Item 2.01 Exhibits

The following exhibit is filed as part of this report:

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.

AMERICAN OUTDOOR BRANDS CORPORATION,
a Nevada corporation

By: /s/ Robert J. Cicero
Robert J. Cicero
Sr. Vice President, General Counsel,
Chief Compliance Officer and Secretary

Dated: May 21, 2020



AMERICAN OUTDOOR BRANDS CORPORATION

CONFLICT MINERALS REPORT

FOR THE REPORTING PERIOD

JANUARY 1, 2019 TO DECEMBER 31, 2019

INTRODUCTION

This Conflict Minerals Report for American Outdoor Brands Corporation (“**AOBC**,” “**Company**,” “**we**,” or “**our**”) is provided for the reporting period January 1, 2019 to December 31, 2019, and is presented to comply with Rule 13p-1 under the Securities Exchange Act of 1934 (the “**Rule**”), and the Public Statement on the Effect of the Recent Court of Appeals Decision on the Conflict Minerals Rule issued by the Director of the Division of Corporation Finance of the Securities and Exchange Commission on April 29, 2014 (the “**SEC Statement**”). The Rule was adopted by the Securities and Exchange Commission (the “**SEC**”) to implement reporting and disclosure requirements related to conflict minerals as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act (“**Dodd-Frank Act**”). The Rule imposes certain reporting obligations on SEC registrants whose manufactured products contain tin, tantalum, tungsten, or gold (“**3TG**,” also defined by the Rule as “conflict minerals”), and who have reason to believe that the products they manufacture, or contract to manufacture, contain conflict minerals that are necessary to the functionality or production of those products. If the SEC registrant has reason to believe that any conflict minerals may have originated in the Democratic Republic of the Congo or an adjoining country, or is unable to determine the country of origin of those conflict minerals, the SEC registrant is required to submit a Conflict Minerals Report to the SEC that includes a description of the measures it took to exercise due diligence on the conflict minerals’ source and chain of custody.

COMPANY BACKGROUND

AOBC is a leading manufacturer, designer and provider of consumer products for the shooting, hunting, and rugged outdoor enthusiast. The Company reports two segments: Firearms and Outdoor Products & Accessories. Firearms manufactures handguns, long guns, handcuffs, suppressors, and other firearm-related products to a wide variety of customers, including gun enthusiasts, collectors, hunters, sportsmen, competitive shooters, individuals desiring home and personal protection, law enforcement and security agencies and officers, and military agencies in the United States and throughout the world. We sell our firearm products under the Smith & Wesson®, M&P®, Performance Center®, Thompson/Center Arms™, and Gemtech® brands. We also provide manufacturing, forging, machining, and precision plastic injection molding services. In Outdoor Products & Accessories, we design, source, distribute, and manufacture reloading, gunsmithing, and gun cleaning supplies; high-quality stainless-steel cutting tools and accessories; meat processing and preservation products; flashlights; tree saws and related trimming accessories; shooting supplies, rests, and other related accessories; apparel; vault accessories; laser grips and laser sights; and a full range of products for survival and emergency preparedness. Brands in Outdoor Products & Accessories include Caldwell®, Wheeler®, Tipton®, Frankford, Arsenal®, Lockdown®, Hooyman®, BOG®, Crimson Trace®, Imperial®, Schrade®, Old Timer®, Uncle Henry®, BUBBA®, MEAT!™, Smith & Wesson® Accessories, M&P® Accessories, Thompson/Center™ Accessories, and UST®.

A copy of the Company’s Conflict Mineral Policy is available on our website at www.aob.com/conflictmineralsreport.

REPORT

This Conflict Minerals Report is provided for the reporting period January 1, 2019 to December 31, 2019 in accordance with the Rule, the instructions to Form SD, and the SEC Statement. Please refer to the Rule, Form SD and Securities Exchange Release No. 34-67716 for definitions to the terms used in this Report, unless otherwise defined herein.

In accordance with the Rule and the instructions to Form SD, AOBC undertook due diligence to determine the source of origin of any necessary conflict minerals used in products it manufactures or contracts to manufacture. In conducting its due diligence, AOBC implemented the Organization for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (including the Supplements on Tin, Tantalum and Tungsten, and the Gold Supplement) (Second Edition OECD 2013) (“**OECD Guidance**”), an internationally recognized due diligence framework.

Design of Our Due Diligence Measures

Our conflict minerals due diligence measures have been designed to conform with the OECD Guidance, as applicable, for tin, tantalum, tungsten, gold and downstream companies (as the term is defined in the OECD Guidance), in all material respects. The Company does not make direct purchases of raw ore or unrefined conflict minerals in the Covered Countries. We designed our due diligence measures to:

1. design and implement strategies to determine the presence of conflict minerals in our products;
2. establish management systems for supply chain due diligence and reporting compliance;
3. identify and assess conflict minerals content in our supply chain;
4. identify and mitigate any risk for potential non-compliance with the Rule; and
5. report on our conflict minerals supply chain due diligence activities, as required by the Rule.

Due Diligence Measures Performed

Our due diligence measures for the reporting period January 1, 2019 to December 31, 2019 included the following activities:

1. We updated our product taxonomy for the products that were subject to reporting in the 2019 reporting period, and reviewed additions with company product managers, engineers, metallurgists and supply chain personnel, to determine which products or components have the possibility of containing necessary conflict minerals.
2. We surveyed any suppliers involved with products or components we determined could possibly contain necessary conflict minerals, to ascertain for each of these conflict minerals (i) whether the product or component contained necessary conflict minerals, (ii) the smelter or refiner where it was processed, (iii) its country of origin, and (iv) its mine of origin.
3. We leveraged the due diligence conducted on smelters and refiners by the Responsible Minerals Initiative (the “**RMI**”), and its Responsible Minerals Assurance Process (the “**RMAP**”), by comparing the names of the smelters identified by our suppliers to those identified as compliant in the RMAP. The RMAP uses independent private sector auditors to audit the source, including mines of origin, and chain of custody of the conflict minerals used by smelters and refiners that agree to participate in the RMAP. The smelters and refiners that are found to be RMAP compliant are those for which the independent auditor has verified that the smelter’s or refiner’s conflict minerals originated from conflict free mines and trading in the Democratic Republic of the Congo or any of its adjoining countries. A list of smelters identified to date, and associated information, is provided hereto as **Attachment A**.

After conducting good faith due diligence on the presence of necessary conflict minerals in certain of the Company’s products, AOBC has been unable to identify all smelters, refiners in its supply chain and the ultimate source of origin of such minerals. The Company is continuing its efforts to identify and mitigate risks in its supply chain and to obtain complete information from its upstream suppliers. The Company’s efforts are necessarily dependent upon the willingness of its supply chain participants to cooperate and assist in this endeavor and there can be no guarantee that the Company will be able to obtain adequate and reliable information upon which to base its analysis.

Attachment A
SMELTER DETAILS

<u>Smelter Name</u>	<u>Smelter Country</u>	<u>3TG</u>
Abington Reldan Metals, LLC	UNITED STATES	Gold
Advanced Chemical Company	UNITED STATES	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
Anhui Tongling Nonferrous Metal Mining Co., Ltd.	CHINA	Gold
Argor-Heraeus S.A.	SWITZERLAND	Gold
Asahi Pretec Corp	JAPAN	Gold
Asahi Refining Canada Ltd.	CANADA	Gold
Asahi Refining USA Inc.	UNITED STATES	Gold
Asaka Riken Co., Ltd.	JAPAN	Gold
ATAkulche	TURKEY	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
CGR Metalloys Pvt Ltd.	INDIA	Gold
Chimet S.p.A.	ITALY	Gold
China's Shandong Gold Mining Co., Ltd	CHINA	Gold
Chugai Mining	JAPAN	Gold
Degussa Sonne / Mond Goldhandel GmbH	GERMANY	Gold
DODUCO Contacts and Refining GmbH	GERMANY	Gold
Dowa	JAPAN	Gold
	KOREA,	
DSC (Do Sung Corporation)	REPUBLIC OF	Gold
Eco-System Recycling Co., Ltd.	JAPAN	Gold
	UNITED ARAB	
Emirates Gold DMCC	EMIRATES	Gold
Faggi Enrico S.p.A.	ITALY	Gold
Fidelity Printers and Refiners Ltd.	ZIMBABWE	Gold

Geib Refining Corporation	UNITED STATES	Gold
Gold Refinery of Zijin Mining Group Co., Ltd.	CHINA	Gold
Great Wall Precious Metals Co., Ltd.	CHINA	Gold
Guangdong Gaoyao Co	CHINA	Gold
Guangdong Jinding Gold Limited	CHINA	Gold
Gujarat Gold Centre	INDIA	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	UNITED STATES	Gold
Heraeus Ltd Hong Kong	HONG KONG	Gold
Heraeus Ltd. Hong Kong	CHINA	Gold
Heraeus Metals Hong Kong Ltd.	CHINA	Gold
Heraeus Precious Metals GmbH & Co. KG	GERMANY	Gold
Hunan Chenzhou Mining 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
Japan Mint	JAPAN	Gold
Jiangxi Copper Co., Ltd.	CHINA	Gold
Johnson Matthey Inc	UNITED STATES	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
Kazzakhmys Smelting LLC	KAZAKHSTAN	Gold
Kazzinc	KAZAKHSTAN	Gold
Kennecott Utah Copper LLC	UNITED STATES	Gold
KGHM Polska Miedz S.A.	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 Jinyuan Tonghui Refinery Co., Ltd.	CHINA	Gold
Lingboa Gold Co., Ltd.	CHINA	Gold
Lingboa Jinyuan Tonghui Refinery Co., Ltd.	CHINA	Gold
L'Orfebre S.A.	ANDORRA	Gold

LS-NIKKO Copper Inc.	KOREA,	Gold
Luoyang Zijin Yinhui Gold Refinery Co., Ltd.	REPUBLIC OF	
Marsam Metals	CHINA	Gold
Materion	BRAZIL	Gold
Matsuda Sangyo Co. Ltd	UNITED STATES	Gold
Metalor Technologies (Hong Kong) Ltd.	JAPAN	Gold
Metalor Technologies (Singapore) Pte., Ltd.	CHINA	Gold
Metalor Technologies (Suzhou) Ltd.	SINGAPORE	Gold
Metalor Technologies S.A.	CHINA	Gold
Metalor USA Refining Corporation	SWITZERLAND	Gold
Metalúrgica Met-Mex Peñoles S.A. De C.V.	UNITED STATES	Gold
Mitsubishi Materials Corporation	MEXICO	Gold
Mitsui Mining and Smelting Co., Ltd.	JAPAN	Gold
MMTC-PAMP India Pvt., Ltd.	JAPAN	Gold
Modeltech Sdn Bhd	INDIA	Gold
Morris and Watson	MALAYSIA	Gold
Morris and Watson Gold Coast	NEW ZEALAND	Gold
	AUSTRALIA	Gold
	RUSSIAN	
Moscow Special Alloys Processing Plant	FEDERATION	Gold
Nadir Metal Rafineri San. Ve Tic. A.S.	TURKEY	Gold
Navoi Mining and Metallurgical Combinat	UZBEKISTAN	Gold
Nihon Material Co., Ltd.	JAPAN	Gold
Niihama Toyo Smelter & Refinery	JAPAN	Gold
Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	AUSTRIA	Gold
Ohura Precious Metal Industry Co., Ltd.	JAPAN	Gold
	RUSSIAN	
OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	FEDERATION	Gold
	RUSSIAN	
OJSC Novosibirsk Refinery	FEDERATION	Gold
PAMP S.A.	SWITZERLAND	Gold
Pease & Curren	UNITED STATES	Gold
Penglai Penggang Gold Industry Co., Ltd.	CHINA	Gold
	RUSSIAN	
Prioksky Plant of Non-Ferrous Metals	FEDERATION	Gold
PT Aneka Tambang (Persero) Tbk	INDONESIA	Gold
PX Precinox S.A.	SWITZERLAND	Gold
Rand Refinery (Pty) Ltd.	SOUTH AFRICA	Gold
Remondis PMR B.V.	NETHERLANDS	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 KOREA,	Gold
Samwon Metals Corp.	REPUBLIC OF	Gold
SAXONIA Edelmetalle GmbH	GERMANY	Gold
Schone Edelmetaal B.V.	NETHERLANDS	Gold
SEMPSA Joyería Platería 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, PROVINCE OF CHINA	Gold
So Accurate Group, Inc.	UNITED STATES	Gold
So Accurate Refining Group	UNITED STATES	Gold
SOE Shyolkovsky Factory of Secondary Precious Metals	RUSSIAN FEDERATION	Gold
Solar Applied Materials Taiwan	TAIWAN	Gold
Solar Applied Materials Technology Corp.	TAIWAN, PROVINCE OF CHINA	Gold
Sovereign Metals	INDIA	Gold
State Research Institute Center for Physical Sciences and Technology	LITHUANIA	Gold
Sudan Gold Refinery	SUDAN	Gold
Sumitomo Metal Mining Co. Ltd.	JAPAN	Gold
SungEel HiTech	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 Zambia	ZAMBIA	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
Xing Hong Tai Xi Ye Co. Ltd.	CHINA	Gold
Xstrata Canada Corporation	CANADA	Gold
Yamakin Co., Ltd.	JAPAN	Gold
Yokohama Metal Co., Ltd.	JAPAN	Gold
Yunnan Copper Industry Co., Ltd.	CHINA	Gold

Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA	Gold
Asaka Riken Co., Ltd.	JAPAN	Tantalum
AVX	UNITED STATES	Tantalum
Cabot Corporation	UNITED STATES	Tantalum
Changsha South Tantalum Niobium Co., Ltd.	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 Rising Rare Metals - EO Materials Ltd.	CHINA	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 Smelting GmbH & Co. KG	GERMANY	Tantalum
H.C. Starck Tantalum and Niobium GmbH	GERMANY	Tantalum
HC Starck	GERMANY	Tantalum
Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA	Tantalum
Jiangsu Shagang Group Huaigang Special Steel Co., Ltd	CHINA	Tantalum
Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHINA	Tantalum
Jiangxi Tuohong New Raw Material	CHINA	Tantalum
JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINA	Tantalum
Jiujiang Tanbre Co., Ltd.	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
Mineração Taboca S.A.	BRAZIL	Tantalum
Mitsui Mining and Smelting Co., Ltd.	JAPAN	Tantalum
Ningxia Orient Tantalum Industry Co., Ltd.	CHINA	Tantalum
NPM Silmet AS	ESTONIA	Tantalum
Plansee SE Liezen	AUSTRIA	Tantalum
Plansee SE Reutte	AUSTRIA	Tantalum
	MACEDONIA,	
	THE FORMER	
	YUGOSLAV	
Power Resources Ltd.	REPUBLIC OF	Tantalum
Qian'an City Jiujiang Wire Co., Ltd	CHINA	Tantalum

QuantumClean	UNITED STATES	Tantalum
Resind Industria e Comercio Ltda.	BRAZIL	Tantalum
RFH Tantalum Smeltery Co., Ltd./Yanling Jincheng Tantalum & Niobium Co., Ltd.	CHINA	Tantalum
Shanghai Baosteel Group Corporation	CHINA	Tantalum
Solikamsk Magnesium Works OAO	RUSSIAN	
Taki Chemical Co., Ltd.	FEDERATION	Tantalum
Telex Metals	JAPAN	Tantalum
Ulba Metallurgical Plant JSC	UNITED STATES	Tantalum
XinXing HaoRong Electronic Material Co., Ltd.	KAZAKHSTAN	Tantalum
Yanling Jincheng Tantalum & Niobium Co., Ltd.	CHINA	Tantalum
Alpha	CHINA	Tantalum
Amalgamated Metals Corporation, Ketabang	UNITED STATES	Tin
An Vinh Joint Stock Mineral Processing Company	UNITED	
Best Metals	KINGDOM	Tin
Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	VIET NAM	Tin
Chian	BRAZIL	Tin
China Tin Group Co., Ltd.	CHINA	Tin
China Yunnan Tin Co Ltd.	CHINA	Tin
CNMC (Guangxi) PGMA Co., Ltd.	CHINA	Tin
Cookson	CHINA	Tin
CV Ayi Jaya	UNITED STATES	Tin
CV Dua Sekawan	INDONESIA	Tin
CV Gita Pesona	INDONESIA	Tin
CV Tiga Sekawan	INDONESIA	Tin
CV United Smelting	INDONESIA	Tin
CV Venus Inti Perkasa	INDONESIA	Tin
Dongguan City Thousand Island Metal Tin Co., Ltd.	INDONESIA	Tin
Dowa	CHINA	Tin
Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company	JAPAN	Tin
	VIET NAM	Tin
	BOLIVIA	
	(PLURINATIONAL	
EM Vinto	STATE OF)	Tin
Estanho de Rondonia S.A.	BRAZIL	Tin
Fenix Metals	POLAND	Tin
Gejiu Fengming Metallurgy Chemical Plant	CHINA	Tin
Gejiu Jinye Mineral Company	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

Guangdong Zhongshi Metal Co., Ltd	CHINA	Tin
Guangxi Pinggui PGMA Co. Ltd.	CHINA	Tin
Guanyang Guida Nonferrous Metal Smelting Plant	CHINA	Tin
He Nan Yu Gang	CHINA	Tin
HuiChang Hill Tin Industry Co., Ltd.	CHINA	Tin
Huichang Jinshunda Tin Co., Ltd.	CHINA	Tin
IBF IND Brasilleira de Ferroligas Ltd.	BRAZIL	Tin
Jiangxi New Nanshan Technology Ltd.	CHINA	Tin
Jiangyin Juneng Aluminum Company	CHINA	Tin
Jun Hon Ji	CHINA	Tin
Liuzhou China Tin	CHINA	Tin
Magnu's Minerais Metais e Ligas Ltda.	BRAZIL	Tin
Malaysia Smelting Corporation (MSC)	MALAYSIA	Tin
MCP Metal Specialties, Inc.	UNITED STATES	Tin
Melt Metais e Ligas S.A.	BRAZIL	Tin
Metallic Resources, Inc.	UNITED STATES	Tin
Metallo Belgium N.V.	BELGIUM	Tin
Metallo Chimique	BELGIUM	Tin
Metallo Spain S.L.U.	SPAIN	Tin
Mineracao Taboca SA	BRAZIL	Tin
Minsur	PERU	Tin
Mitsubishi Materials Corporation	JAPAN	Tin
Modeltech Sdn Bhd	MALAYSIA	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
	BOLIVIA	
	(PLURINATIONAL	
Operaciones Metalurgical S.A.	STATE OF)	Tin
Pongpipat Company Limited	MYANMAR	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 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 Lautan Harmonis Sejahtera	INDONESIA	Tin
PT Menara Cipta Mulia	INDONESIA	Tin
PT Mitra Stania Prima	INDONESIA	Tin
PT O.M. Indonesia	INDONESIA	Tin
PT Panca Mega Persada	INDONESIA	Tin
PT Premium Tin Indonesia	INDONESIA	Tin
PT Prima Timah Utama	INDONESIA	Tin
PT Rajehan Ariq	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 Tambang Timah	INDONESIA	Tin
PT Timah	INDONESIA	Tin
PT Timah (Persero) Tbk Kundur	INDONESIA	Tin
PT Timah (Persero) Tbk Mentok	INDONESIA	Tin
PT Tinindo Inter Nusa	INDONESIA	Tin
PT Tommy Utama	INDONESIA	Tin
Resind Industria e Comercio Ltda.	BRAZIL	Tin
	TAIWAN,	
	PROVINCE OF	
Rui Da Hung	CHINA	Tin
Soft Metais Ltda.	BRAZIL	Tin
Super Ligas	BRAZIL	Tin
Thailand Smelting and Refining Co. Ltd.	THAILAND	Tin
Thaisarco	THAILAND	Tin
Tuyen Quang Non-Ferrous Metals Joint Stock Company	VIET NAM	Tin
VQB Mineral and Trading Group JSC	VIET NAM	Tin
White Solder Metalurgia e Mineracao Ltda.	BRAZIL	Tin
XiHai	CHINA	Tin
Yifeng Tin Industry Co., Ltd	CHINA	Tin
Yuecheng Tin	CHINA	Tin
Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA	Tin
Yunnan Tin Company Limited	CHINA	Tin
A.L.M.T. TUNGSTEN Corp.	JAPAN	Tungsten
ACL Metais Eireli	BRAZIL	Tungsten
ATI Metalworking Products	UNITED STATES	Tungsten
Chenzhou Diamond Tungsten Products Co., Ltd.	CHINA	Tungsten
Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA	Tungsten
CNMC (Guangxi) PGMA Co., Ltd.	CHINA	Tungsten
Cosco (JM) Aluminum Development Co., Ltd	CHINA	Tungsten

Dongguan Meigu Outdoor Toos 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
H.C. Starck Tungsten GmbH	GERMANY	Tungsten
	RUSSIAN	
Hdrometallurg, JSC	FEDERATION	Tungsten
Hunan Chenzhou Mining Co., Ltd.	CHINA	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
Hunan NonFerrous Metals Holding Group Co., Ltd.	CHINA	Tungsten
	RUSSIAN	
Hydrometallurg, JSC	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 Tungsten Industry Co Ltd	CHINA	Tungsten
Jiangxi Xincheng Tungsten Industry Co., Ltd	CHINA	Tungsten
Jiangxi Yaosheng Tungsten Co., Ltd.	CHINA	Tungsten
Kennametal Fallon	UNITED STATES	Tungsten
Kennametal Huntsville	UNITED STATES	Tungsten
Malipo Haiyu Tungsten Co., Ltd.	CHINA	Tungsten
Masan Tungsten Chemical LLC (MTC)	VIET NAM	Tungsten
Mo Yang Maoyi Company	CHINA	Tungsten
	RUSSIAN	
Moliren Ltd.	FEDERATION	Tungsten
Moyang Trading Company	CHINA	Tungsten
Niagara Refining LLC	UNITED STATES	Tungsten
Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC	VIET NAM	Tungsten
Philippine Chuangxin Industrial Co., Inc.	PHILIPPINES	Tungsten
Qian'an City Jiuji Wire Co., LTD	CHINA	Tungsten
South-East Nonferrous Metal Company Limited of Hengyang City	CHINA	Tungsten

Tejing (Vietnam) Tungsten Co., Ltd.	VIET NAM	Tungsten
Tiamning Furen Group	CHINA	Tungsten
	RUSSIAN	
Unecha Refractory Metals Plant	FEDERATION	Tungsten
Wolfram Bergbau und Hutten AG	AUSTRIA	Tungsten
	RUSSIAN	
Wolfram Company CJSC	FEDERATION	Tungsten
	KOREA,	
Woltech Korea Co., Ltd.	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	Tungsten
Yangchun Xinda Special Steel Industrial Co., Ltd.	CHINA	Tungsten
Yangchun Yongsheng Metal Products Co, Ltd.	CHINA	Tungsten
Yangjiang Meigao Stainless Steel	CHINA	Tungsten
Yangjiang Muyang Trading Co., Ltd.	CHINA	Tungsten
Yangjiang Yangdong Beiguan Dashi Village	CHINA	Tungsten