# UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Washington, D.C. 20549

FORM SD		
SPECIALIZED DISCLOSURE REPORT		

### **SMITH & WESSON BRANDS, INC.**

(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)

Kevin A. Maxwell, SVP, 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, 2021.

#### **Section 1** Conflict Minerals Disclosure

#### Item 1.01 Conflict Minerals Disclosure and Report

A copy of Smith & Wesson Brands, Inc. Conflict Minerals Report is filed as Exhibit 1.01 hereto and is publicly available at <a href="https://ir.smith-wesson.com/corporate-governance/conflict-minerals">https://ir.smith-wesson.com/corporate-governance/conflict-minerals</a>. 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.

SMITH & WESSON BRANDS, INC., a Nevada corporation

By: /s/ Kevin A. Maxwell

Dated: May 27, 2022

Kevin A. Maxwell Senior Vice President, General Counsel, Chief Compliance Officer and Secretary



#### SMITH & WESSON BRANDS, INC.

#### CONFLICT MINERALS REPORT

### FOR THE REPORTING PERIOD JANUARY 1, 2021 TO DECEMBER 31, 2021

#### INTRODUCTION

This Conflict Minerals Report for Smith & Wesson Brands, Inc. ("SWBI," "Company," "we," or "our") is provided for the reporting period January 1, 2021 to December 31, 2021, 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. 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

SWBI is a U.S.-based leader in firearm manufacturing and design, delivering a broad portfolio of quality handgun, long gun, and suppressor products to the global consumer and professional markets under the iconic Smith & Wesson®, M&P® and Gemtech® brands. We also provide manufacturing services, including forging, machining and precision plastic injection molding services.

A copy of our Conflict Mineral Policy is available on our website at <a href="https://ir.smith-wesson.com/corporate-governance/conflict-minerals">https://ir.smith-wesson.com/corporate-governance/conflict-minerals</a>.

#### REPORT

This Conflict Minerals Report is provided for the reporting period January 1, 2021 to December 31, 2021 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, we undertook due diligence to determine the source of origin of any necessary conflict minerals used in products we manufacture or contract to manufacture. In conducting due diligence, we 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) (Third Edition OECD 2016) ("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. We do 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 2021 reporting period included the following activities:

- 1. We updated our product taxonomy for the products that were subject to reporting in the 2021 reporting period, and reviewed additions with our 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. Where possible, 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 as **Attachment A**.

#### **Determination; Continuing Mitigation Efforts**

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

## Attachment A SMELTER DETAILS

Smelter Name	Smelter Country	3TG
Advanced Chemical Company	UNITED STATES OF AMERICA	Gold
Agosi AG	GERMANY	Gold
Aida Chemical Industries Co., Ltd.	JAPAN	Gold
Alexy Metals	UNITED STATES OF AMERICA	Gold
Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN	Gold
AngloGold Ashanti Corrego do Sitio Mineracao	BRAZIL	Gold
Argor-Heraeus S.A.	SWITZERLAND	Gold
Asahi Pretec Corp.	JAPAN	Gold
Asahi Refining Canada Ltd.	CANADA	Gold
Asahi Refining USA Inc.	UNITED STATES OF AMERICA	Gold
Asaka Riken Co., Ltd.	JAPAN	Gold
Atasay Kuyumculuk Sanayi Ve Ticaret A.S.*	TURKEY	Gold
Augmont Enterprises Private Limited	INDIA	Gold
Aurubis AG	GERMANY	Gold
Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES	Gold
Boliden AB	SWEDEN	Gold
C. Hafner GmbH + Co. KG	GERMANY	Gold
CCR Refinery—Glencore Canada Corporation	CANADA	Gold
Cendres + Metaux S.A.	SWITZERLAND	Gold
Chimet S.p.A.	ITALY	Gold
Daye Non-Ferrous Metals Mining Ltd.*	CHINA	Gold
Degussa Sonne / Mond Goldhandel GmbH*	GERMANY	Gold
DODUCO Contacts and Refining GmbH	GERMANY	Gold
Dowa	JAPAN	Gold
DSC (Do Sung Corporation)	KOREA, REPUBLIC OF	Gold
Eco-System Recycling Co., Ltd. East Plant	JAPAN	Gold
Emerald Jewel Industry India Limited (Unit 1)*	INDIA	Gold
Emerald Jewel Industry India Limited (Unit 1)* Emerald Jewel Industry India Limited (Unit 3)*	INDIA	Gold
Emerald Jewel Industry India Limited (Unit 3)* Emerald Jewel Industry India Limited (Unit 4)*	INDIA	Gold
	ZIMBABWE	Gold
Fidelity Printers and Refiners Ltd.*		Gold
Fujairah Gold FZC*	UNITED ARAB EMIRATES	
GCC Gujrat Gold Centre Pvt. Ltd.	INDIA	Gold Gold
Geib Refining Corporation	UNITED STATES OF AMERICA	
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
Hangzhou Fuchunjiang Smelting Co., Ltd.*	CHINA	Gold
Heimerle + Meule GmbH	GERMANY	Gold
Heraeus Germany GmbH Co. KG	GERMANY	Gold
Heraeus Metals Hong Kong Ltd.	CHINA	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
International Precious Metal Refiners*	UNITED ARAB EMIRATES	Gold
Ishifuku Metal Industry Co., Ltd.	JAPAN	Gold
Istanbul Gold Refinery	TURKEY	Gold
Italpreziosi	ITALY	Gold

Smelter Name	Smelter Country	3TG
Jiangxi Copper Co., Ltd.	CHINA	Gold
JSC Novosibirsk Refinery*	RUSSIAN FEDERATION	Gold
JSC Uralelectromed*	RUSSIAN FEDERATION	Gold
JX Nippon Mining & Metals Co., Ltd.	JAPAN	Gold
K.A. Rasmussen*	NORWAY	Gold
Kazakhmys Smelting LLC*	KAZAKHSTAN	Gold
Kazzinc	KAZAKHSTAN	Gold
Kennecott Utah Copper LLC	UNITED STATES OF AMERICA	Gold
KGHM Polska Miedz Spolka Akcyjna	POLAND	Gold
Kojima Chemicals Co., Ltd.	JAPAN	Gold
Kyrgyzaltyn JSC*	KYRGYZSTAN	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
LT Metal Ltd.	KOREA, REPUBLIC OF	Gold
Marsam Metals	BRAZIL	Gold
Materion	UNITED STATES OF AMERICA	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 OF AMERICA	Gold
Metalurgica Met-Mex Penoles S.A. De C.V.	MEXICO	Gold
Mitsubishi Materials Corporation	JAPAN	Gold
Mitsui Mining and Smelting Co., Ltd.	JAPAN	Gold
Modeltech Sdn Bhd*	MALAYSIA	Gold
Morris and Watson*	NEW ZEALAND	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
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" (OJSC	RUSSIAN FEDERATION	Gold
Krastsvetmet)*		
PAMP S.A.	SWITZERLAND	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 OF AMERICA	Gold
Rand Refinery (Pty) Ltd.	SOUTH AFRICA	Gold
REMONDIS PMR B.V.	NETHERLANDS	Gold
Royal Canadian Mint	CANADA	Gold
Safimet S.p.A	ITALY	Gold
SAFINA A.S.	CZECHIA	Gold
Sai Refinery*	INDIA	Gold
Samduck Precious Metals	KOREA, REPUBLIC OF	Gold
Sancus ZFS (L'Orfebre, SA)	COLOMBIA	Gold

Smelter Name	Smelter Country	3TG
SAXONIA Edelmetalle GmbH*	GERMANY	Gold
SEMPSA Joyeria Plateria S.A.	SPAIN	Gold
Shandong Gold Smelting Co., Ltd.	CHINA	Gold
Shandong Humon Smelting Co., Ltd.*	CHINA	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
SOE Shyolkovsky Factory of Secondary Precious Metals*	RUSSIAN FEDERATION	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
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
Tokuriki Honten Co., Ltd.	JAPAN	Gold
Tongling Nonferrous Metals Group Co., Ltd.*	CHINA	Gold
TOO Tau-Ken-Altyn	KAZAKHSTAN	Gold
Umicore Precious Metals Thailand	THAILAND	Gold
Umicore S.A. Business Unit Precious Metals Refining	BELGIUM	Gold
United Precious Metal Refining, Inc.	UNITED STATES OF AMERICA	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
Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA	Gold
AMG Brasil	BRAZIL	Tantalum
Asaka Riken Co., Ltd.	JAPAN	Tantalum
Changsha South Tantalum Niobium Co., Ltd.	CHINA	Tantalum
D Block Metals, LLC	UNITED STATES OF AMERICA	Tantalum
Exotech Inc.*	UNITED STATES OF AMERICA	Tantalum
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 OF AMERICA	Tantalum
Guangdong Rising Rare Metals-EO Materials Ltd.	CHINA	Tantalum
H.C. Starck Hermsdorf GmbH	GERMANY	Tantalum
H.C. Starck Inc.	UNITED STATES OF AMERICA	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 JinXin Nonferrous Metals Co., Ltd.	CHINA	Tantalum
Jiujiang Tanbre Co., Ltd.	CHINA	Tantalum
Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA	Tantalum
KEMET de Mexico	MEXICO	Tantalum
Meta Materials	NORTH MACEDONIA, REPUBLIC OF	Tantalum
Metallurgical Products India Pvt., Ltd.	INDIA	Tantalum
Mineracao Taboca S.A.	BRAZIL	Tantalum
Mitsui Mining and Smelting Co., Ltd.	JAPAN	Tantalum
Ningxia Orient Tantalum Industry Co., Ltd.	CHINA	Tantalum
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Precious Minerais and Smelting Limited. INDIA 11n	Precious Minerals and Smelting Limited*	INDIA	Tin

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Smelter Name	Smelter Country	3TG
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 Belitung Industri Sejahtera*	INDONESIA	Tin
PT Bukit Timah	INDONESIA	Tin
PT Menara Cipta Mulia	INDONESIA	Tin
PT Mitra Stania Prima	INDONESIA	Tin
PT Mitra Sukses Globalindo	INDONESIA	Tin
PT Panca Mega Persada*	INDONESIA	Tin
PT Prima Timah Utama	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 Timah Tbk Kundur	INDONESIA	Tin
PT Timah Tok Mentok	INDONESIA	Tin
PT Tinindo Inter Nusa	INDONESIA	Tin
Resind Industria e Comercio Ltda.	BRAZIL	Tin
Rui Da Hung	TAIWAN, PROVINCE OF CHINA	Tin
Soft Metais Ltda.	BRAZIL	Tin
Super Ligas	BRAZIL	Tin
	VIETNAM	Tin
Thai Nguyen Mining and Metallurgy Co., Ltd. Thaisarco		Tin
	THAILAND	
Tin Smelting Branch of Yunnan Tin Co., Ltd	CHINA	Tin
Tin Technology & Refining	UNITED STATES OF AMERICA	Tin
VQB Mineral and Trading Group JSC*	VIET NAM	Tin
White Solder Metalurgia e Mineracao Ltda.	BRAZIL	Tin
Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA	Tin
Yunnan Yunfan Non-ferrous Metals Co., Ltd.*	CHINA	Tin
A.L.M.T. Corp.	JAPAN DRAZII	Tungsten
ACL Metais Eireli	BRAZIL	Tungsten
Artek LLC*	RUSSIAN FEDERATION	Tungsten
Asia Tungsten Products Vietnam Ltd.	VIETNAM	Tungsten
Chenzhou Diamond Tungsten Products Co., Ltd.	CHINA	Tungsten
China Molybdenum Tungsten Co., Ltd.	CHINA	Tungsten
Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA	Tungsten
Cronimet Brasil Ltda	BRAZIL	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 OF AMERICA	Tungsten
Guangdong Xianglu Tungsten Co., Ltd.	CHINA	Tungsten
H.C. Starck Tungsten GmbH	GERMANY	Tungsten
Hunan Chenzhou Mining Co., Ltd.	CHINA	Tungsten
Hunan Chunchang Nonferrous Metals 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

Smelter Name	Smelter Country	3TG
Jiangxi Gan Bei Tungsten Co., Ltd.	CHINA	Tungsten
Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHINA	Tungsten
Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CHINA	Tungsten
Jiangxi Yaosheng Tungsten Co., Ltd.	CHINA	Tungsten
JSC "Kirovgrad Hard Alloys Plant"	RUSSIAN FEDERATION	Tungsten
Kennametal Fallon	UNITED STATES OF AMERICA	Tungsten
Kennametal Huntsville	UNITED STATES OF AMERICA	Tungsten
KGETS Co., Ltd.	KOREA, REPUBLIC OF	Tungsten
Lianyou Metals Co., Ltd.	TAIWAN, PROVINCE OF CHINA	Tungsten
Malipo Haiyu Tungsten Co., Ltd.	CHINA	Tungsten
Masan High-Tech Materials	VIETNAM	Tungsten
Moliren Ltd.	RUSSIAN FEDERATION	Tungsten
Niagara Refining LLC	UNITED STATES OF AMERICA	Tungsten
Philippine Chuangxin Industrial Co., Inc.	PHILIPPINES	Tungsten
TANIOBIS Smelting GmbH & Co. KG	GERMANY	Tungsten
Unecha Refractory metals plant	RUSSIAN FEDERATION	Tungsten
Wolfram Bergbau und Hutten AG	AUSTRIA	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

<sup>\*</sup> Limited information was provided for this entry. Entry does not appear on the RMI Active List, nor the RMI Conformant List.