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

FORM SD

SPECIALIZED DISCLOSURE REPORT

THE TJX COMPANIES, INC.

(Exact name of registrant as specified in its charter)

DELAWARE
(State or other jurisdiction of
incorporation or organization)

1-4908
(Commission
File Number)

04-2207613
(IRS Employer
Identification No.)

770 Cochituate Road, Framingham, MA 01701
(Address of principal executive offices) (Zip Code)

Scott Goldenberg
(508) 390-1000
(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 of 1934 (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2017

Section 1 - Conflict Minerals Disclosure*Item 1.01 Conflict Minerals Disclosure and Report*

Conflict Minerals Disclosure

The Company has filed a Conflict Minerals Report, included as Exhibit 1.01 to this Form and available on its website, www.tjx.com, in the Investor Information: SEC filings section at: <http://investor.tjx.com/phoenix.zhtml?c=118215&p=irol-sec>

Information appearing on www.tjx.com is not a part of, and is not incorporated by reference into, this Form SD.

Item 1.02 Exhibit

The Company is hereby filing its Conflict Minerals Report as Exhibit 1.01 to this Form.

Section 2 - Exhibits*Item 2.01 Exhibits*

| <u>Exhibit No.</u> | <u>Description</u> |
|--------------------|---|
| 1.01 | Conflict Minerals Report, as described in Items 1.01 and 1.02 of this Form. |

SIGNATURE

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 undersigned hereunto duly authorized.

THE TJX COMPANIES, INC.

/s/ Scott Goldenberg

Scott Goldenberg
Senior Executive Vice President,
Chief Financial Officer

Dated: May 31, 2018

Exhibit Index

Exhibit No.

Description

1.01 Conflict Minerals Report, as described in Items 1.01 and 1.02 of this Form

The TJX Companies, Inc.
 Conflict Minerals Report for the reporting period
 from January 1, 2017 to December 31, 2017

Introduction

Under the Securities Exchange Act of 1934, Rule 13p-1 and Form SD (collectively, the **Rule**), public companies are required to report certain information when they manufacture or contract to manufacture products where specified minerals, defined as conflict minerals, are determined to be necessary to the functionality or production of those products. These minerals, which also are often referred to as **3TG**, are columbite-tantalite (coltan), cassiterite and wolframite (including their derivatives, which for the purpose of the Rule are tin, tantalum and tungsten) and gold. Companies are required to perform an assessment, referred to as a reasonable country of origin inquiry, or **RCOI**, to determine if the 3TG present in these products originated, or may have originated, in the region covered by the Rule, meaning the Democratic Republic of the Congo (referred to as the **DRC**) and the adjoining countries, consisting of Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia. The Rule also provides that companies must perform additional diligence on the source and chain of custody of 3TG that originated in the DRC or an adjoining country and are not from recycled or scrap sources, or that the company has reason to believe may have originated in the DRC or an adjoining country and may not be from recycled or scrap sources.

Overview

The TJX Companies, Inc. (**TJX** or the **Company**) is an off-price retailer of apparel and home fashions with over 4,000 stores across three continents in nine countries, offering a rapidly changing assortment of merchandise, including apparel and home fashions. The Company's strategies to acquire merchandise are intentionally flexible to allow the buying organization to react to frequently changing opportunities and trends in the market and to adjust how and what is acquired as well as when it is acquired.

Product Scoping; Reasonable Country of Origin Inquiry

Products acquired by TJX from the market that TJX does not manufacture or "contract to manufacture" (as described in the Rule) are outside the scope of the Rule and this Report. A portion of the products sold by TJX could be in scope, which, under the Rule and Securities and Exchange Commission guidance, depends on whether a product contains 3TG and the degree of influence exercised by TJX over the materials, parts, ingredients, or components included in the product. The portion of products sold by TJX that it believes could be considered to be in scope under the Rule are referred to in this Report as **In-scope Products**. In part because of the geographic diversity and changing nature of TJX's product mix, the In-scope Products reflect a changing variety of complicated supply chains of many different vendors, with a number of third parties between the original source of any raw materials, the manufacturer, and TJX. TJX does not own or control manufacturing facilities, smelters, or mines and believes that it is at least several layers removed from the mining of any minerals from a specific mine and from any smelter or refiner providing minerals for In-scope Products.

For its RCOI, TJX used the management systems contemplated by Step One of the OECD Guidance (defined below) and the vendor engagement process contemplated by Step Two of the OECD Guidance. These steps and the related activities are further discussed below under "*Description of Diligence Design and Diligence Performed.*"

To determine whether any products might have been sourced from the covered region, TJX used the Conflict Minerals Reporting Template (referred to as the **CMRT** in this Report) developed by the Responsible Minerals Initiative, or **RMI** (formerly known as the Conflict-Free Sourcing Initiative), to survey vendors that it believed potentially supplied In-scope Products (referred to in this Report as **Covered Vendors**) with questions about their 3TG use and supply chain. The Company assessed the responses according to a set of written risk-based evaluation criteria established by the Company relating to the completeness and reliability of the responses. For example, the Company considered a response to be incomplete and to require more information from the Covered Vendor if it indicated that it sourced only from outside the covered region but did not provide information about its smelters as support for that conclusion or did not provide sufficient information about its internal compliance program and diligence practices to support that conclusion.

The Company was unable to determine the origin of at least a portion of the necessary 3TG in its In-scope Products. It performed additional diligence, as described below.

Description of Diligence Design and Diligence Performed

TJX's diligence framework was designed to materially conform to the Organisation for Economic Co-operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition), including the Supplement on Tin, Tantalum and Tungsten and the Supplement on Gold (the *OECD Guidance*). The OECD Guidance has established a five-step framework for due diligence as a basis for responsible global supply chain management of minerals from conflict-affected and high-risk areas. The headings below conform to the headings used in the OECD Guidance for each of the five steps.

Establish strong company management systems

Executive leadership of our 3TG compliance program rests with our SVP, Chief Risk and Compliance Officer. TJX has established a conflict minerals steering committee (the *Committee*) including the SVP, Chief Risk and Compliance Officer; the SVP, Internal Audit; a VP, Legal; and other representatives from compliance/risk and legal, to implement and oversee its conflict minerals compliance program. The Company also consulted with specialist outside counsel to advise it in connection with its compliance efforts and reporting.

The Committee worked with leaders in various functions at the Company, including merchandising, compliance, legal, and internal audit, to review its diligence program and vendor training. Training was done through specific outreach relating to the Company's 3TG compliance program and as a topic integrated with the Company's more general established training programs, which included in-person compliance trainings conducted for certain vendors of the Company at various global locations.

The Committee also has developed a conflict minerals policy which, among other things, sets forth TJX's expectations that its vendors not knowingly source 3TGs in a way that would benefit armed forces in the covered region and that vendors cooperate in the diligence process, including by reaching out to their vendors, as necessary. TJX provides the policy to its vendors through a corporate vendor intranet and contractually requires its vendors to adhere to the policy via its purchase order terms and conditions. TJX does not use its policy to embargo responsible sourcing of 3TGs from the DRC region. The Company's policy is available to the public on its website in the Responsible Business section of the TJX corporate website, tjx.com. Information appearing on www.tjx.com is not a part of, and is not incorporated by reference into, this Conflict Minerals Report.

The policy contains a grievance mechanism relating to issues concerning 3TG, indicating that concerns can be reported to the Company's Chief Compliance Officer at complianceofficer@tjx.com. Compliance concerns can also be reported through the reporting mechanism in the Associate Global Code of Conduct. The contact information for this mechanism includes contacting the Company's Chief Compliance Officer at complianceofficer@tjx.com, using the established helpline, or other contacts included in the Contacts and Reporting section of the Global Code of Conduct.

Additionally, TJX maintains a company-wide document retention policy, which extends to the documents accumulated in performing due diligence for this Report. The required retention period for such documents is at least five years.

Identify and assess risk in the supply chain

As discussed under "*Product Scoping; Reasonable Country of Origin Inquiry*," TJX used a survey process to request supply chain information from the Covered Vendors to assess the sourcing of its products. TJX used the CMRT and, to the extent required, made multiple follow-up requests to work to obtain complete and reliable responses from the Covered Vendors. TJX also provided supplementary instructional materials to help vendors understand and complete the CMRT, as well as to understand the Company's conflict minerals policy. As part of this process, TJX communicated its expectations that vendors cooperate with the Company's compliance efforts and, as necessary, reach out to third parties within their own supply chains to collect relevant information.

TJX evaluated the information provided by each Covered Vendor determined to be in scope. If the other information provided was determined to be complete and reliable under the Company's established protocol, TJX reviewed the Covered Vendor's smelter and refiner information. TJX compared smelters and refiners identified in the Covered Vendors' responses against lists of facilities certified as *Conformant* (as defined in the Appendix) or the equivalent with the Responsible Minerals Assurance Process assessment protocols, or *RMAP*, to help isolate unique, identifiable smelters and to determine if the Covered Vendors' minerals were sourced from mines that did not benefit armed groups in the covered region. If the information provided by a Covered Vendor was determined to be incomplete or unreliable under the Company's protocol, TJX considered the information insufficient for a reliable evaluation of that Covered Vendor's 3TG supply chain.

Design and implement a strategy to respond to identified risks

Using the assessment protocol described above, TJX categorized the responses to identify Covered Vendors who provided responses that were deemed insufficient for a reliable analysis, including because they provided incomplete information. To mitigate sourcing risk, TJX engaged in the vendor communications and follow-up process described above. The Committee briefed representatives of TJX management, including members of its senior executive team, on its findings and risk assessment.

In addition, to the extent that identified smelters and refiners are not listed as Conformant, the Company seeks to exercise leverage over and encourage the smelters and refiners to become Conformant through its membership in the RMI. Among other things, the RMI conducts outreach to non-Conformant smelters and refiners. The Company also utilizes information provided by the RMI to its members to monitor smelter and refiner improvement.

Carry out independent third-party audits of supply chain due diligence at identified points in the supply chain

In connection with its due diligence, the Company utilized and relied on information made available by the RMI concerning independent third-party audits of smelters and refiners to assess smelter and refiner due diligence and to determine whether smelters and refiners are Conformant. Due to its position in the supply chain, the Company does not directly audit smelters and refiners. However, it supports independent third-party audits through its continued membership in the RMI.

Report on supply chain due diligence

The Company prepared and filed a Form SD and this Report to publicly report the results of its supply chain due diligence, and it does so on an annual basis.

In-Scope Products and Results of Diligence

The Company determined that a portion of its products in apparel, including jewelry, and home fashions, could be considered to be in-scope under the Rule.

Through the RCOI and due diligence processes described above on the Company's Covered Vendors, the Company compiled a list of 346 smelters and refiners identified by the Covered Vendors, including 318 validated smelters, meaning the smelter or refiner was included on the CMRT's Smelter Look-up tab list. Of those 346 smelters and refiners across all 3TG, 243 were listed as **Conformant** (70% of the total identified) and 6 were listed as **Active** (as defined below) by the RMI, in each case as of May 7, 2018. 20, or approximately 6%, of the Conformant smelters and refiners may have sourced from the DRC or an adjoining country, based on information made available by the RMI to its members. A list of the identified smelters and refiners that were identified by the Covered Vendors, together with the RMAP status and country of origin information, can be found in Appendix A.

Most of the Covered Vendors reviewed in the diligence process reported their information at a company level rather than at a product level (meaning that they reported the smelters and refiners that processed the 3TG in all of their products, rather than solely those that processed the 3TG in the products sold to the Company). It therefore was not feasible for the Company to connect identified smelters and refiners that were used to process 3TG with specific covered products.

Additional Risk Mitigation Efforts

The Company expects to take additional steps to refine its 3TG compliance program and enhance its due diligence measures for 2018 to further mitigate the risk that the 3TG in its covered products may support armed groups in the covered region. These steps include, among others:

- Working to further increase the response rate for the next reporting cycle;
- Engaging more directly with vendors to improve the quality of responses overall;
- Continuing to remind vendors of the requirements under the Rule and the Company's policy, including its expectations that all Covered Vendors cooperate with its diligence efforts; and
- Continuing to refine its written Conflict Minerals Review and Action Plan and the protocols to effect this plan.

CAUTIONARY NOTE REGARDING FORWARD-LOOKING STATEMENTS

This Conflict Minerals Report contains "forward-looking statements" intended to qualify for the safe harbor from liability established by the Private Securities Litigation Reform Act of 1995. Forward-looking statements are inherently subject to risks, uncertainties and potentially inaccurate assumptions. Such statements give the Company's current expectations or forecasts of future events; they do not relate strictly to historical or current facts. TJX has generally identified such statements by using words indicative of the future such as "anticipate," "believe," "could," "estimate," "expect," "forecast," "intend," "looking forward," "may," "plan," "potential," "project," "should," "target," "will" and "would" or any variations of these words or other words with similar meanings. All statements that

address activities, events or developments that TJX intends, expects or believes may occur in the future are forward-looking statements within the meaning of Section 27A of the Securities Act of 1933, as amended, and Section 21E of the Securities Exchange Act of 1934, as amended, or Exchange Act. These “forward-looking statements” may relate to such matters as the Company’s future actions and results and the outcome of diligence efforts.

The Company cannot guarantee that the results and other expectations expressed, anticipated or implied in any forward-looking statement will be realized. The risks set forth under Item 1A of the Form 10-K filed with the Securities and Exchange Commission on April 4, 2018 describe major risks to TJX’s business. A variety of factors including these risks could cause actual results and other expectations to differ materially from the anticipated results or other expectations expressed, anticipated or implied in the Company’s forward-looking statements. If known or unknown risks materialize, or if underlying assumptions prove inaccurate, actual results could differ materially from past results and those anticipated, estimated or projected in the forward-looking statements. You should bear this in mind as you consider forward-looking statements.

The Company’s forward-looking statements speak only as of the dates on which they are made, and the Company does not undertake any obligation to update any forward-looking statement, whether to reflect new information, future events or otherwise. You are advised, however, to consult any further disclosures TJX may make in future reports to the Securities and Exchange Commission, on the Company’s website, or otherwise.

Appendix A

List of Identified Smelters and Refiners; Country of Origin Information

| <u>Smelter/Refiner</u> | <u>Smelter/Refiner Country</u> | <u>RMAP Conformant</u> |
|---|--------------------------------|------------------------|
| Gold Refiners | | |
| Abington Reldan Metals, LLC | USA | No |
| Advanced Chemical Company | USA | Yes |
| AGR (Perth Mint Australia) | Australia | No |
| Aida Chemical Industries Co., Ltd. | Japan | Yes |
| Al Etihad Gold LLC | United Arab Emirates | Yes |
| Allgemeine Gold-und Silberscheideanstalt A.G. | Germany | Yes |
| Almalyk Mining and Metallurgical Complex (AMMC) | Uzbekistan | Yes |
| AngloGold Ashanti Corrego do Sitio Mineracao | Brazil | Yes |
| Argor-Heraeus SA | Switzerland | Yes |
| Asahi Pretec Corp. | Japan | Yes |
| Asahi Refining Canada Ltd. | Canada | Yes |
| Asahi Refining USA Inc | USA | Yes |
| Asaka Riken Co., Ltd. | Japan | Yes |
| Atasay Kuyumculuk Sanayi Ve Ticaret A.S. | Turkey | No |
| AU Traders and Refiners | South Africa | Yes |
| Aurubis AG | Germany | Yes |
| Bangalore Refinery | India | Active |
| Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | Philippines | Yes |
| Boliden AB | Sweden | Yes |
| C. Hafner GmbH + Co. KG | Germany | Yes |
| Caridad | Mexico | No |
| CCR Refinery - Glencore Canada Corporation | Canada | Yes |
| Cendres + Metaux S.A. | Switzerland | Yes |
| Chimet SPA | Italy | Yes |
| Chugai Mining | Japan | No |
| Daejin Indus Co., Ltd. | Korea | Yes |
| Daye Non-Ferrous Metals Mining Ltd. | China | No |
| DEGUSSA | Germany | No |
| DODUCO Contacts and Refining GmbH | Germany | Yes |
| Dowa | Japan | Yes |
| DSC (Do Sung Corporation) | Korea | Yes |
| Eco-System Recycling Co., Ltd. | Japan | Yes |
| Elemetal Refining, LLC | USA | No |
| Emirates Gold DMCC | United Arab Emirates | Yes |
| Fidelity Printers and Refiners Ltd. | Zimbabwe | No |
| Gansu Seemine Material Hi-Tech Co., Ltd. | China | No |
| GCC Gujrat Gold Centre Pvt. Ltd. | India | No |
| Geib Refining Corporation | USA | Yes |
| Gold Refinery of Zijin Mining Group Co., Ltd. | China | Yes |
| Great Wall Precious Metals Co., Ltd. of CBPM | China | No |
| Guangdong Jinding Gold Limited | China | No |
| Guoda Safina High-Tech Environmental Refinery Co., Ltd. | China | No |
| Hangzhou Fuchunjiang Smelting Co., Ltd. | China | No |

| <u>Smelter/Refiner</u> | <u>Smelter/Refiner Country</u> | <u>RMAP Conformant</u> |
|---|--------------------------------|------------------------|
| HeeSung Metal Ltd. | Korea | Yes |
| Heimerle + Meule GmbH | Germany | Yes |
| Heraeus Metals Hong Kong Ltd. | China | Yes |
| Heraeus Precious Metals GmbH & Co KG | Germany | Yes |
| Hunan Chenzhou Mining Co., Ltd. | China | No |
| HwaSeong CJ CO., LTD. | Korea | No |
| Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | China | Yes |
| Ishifuku Metal Industry Co., Ltd. | Japan | Yes |
| Istanbul Gold Refinery | Turkey | Yes |
| Italpreziosi | Italy | Yes |
| Japan Mint | Japan | Yes |
| Jiangxi Copper Co., Ltd. | China | Yes |
| JSC Ekaterinburg Non-Ferrous Metal Processing Plant | Russia | Yes |
| JSC Uralelectromed | Russia | Yes |
| JX Nippon Mining & Metals Co., Ltd. | Japan | Yes |
| Kaloti Precious Metals | United Arab Emirates | No |
| Kazakhmys Smelting LLC | Kazakhstan | No |
| Kazzinc | Kazakhstan | Yes |
| Kennecott Utah Copper LLC | USA | Yes |
| KGHM Polska Miedz Spolka Akcyjna | Poland | Active |
| Kojima Chemicals Co., Ltd. | Japan | Yes |
| Korea Zinc Co., Ltd. | Korea | Yes |
| Kyrgyzaltyn JSC | Kyrgyzstan | Yes |
| L'azurde Company For Jewelry | Saudi Arabia | No |
| Lingbao Gold Co., Ltd. | China | No |
| Lingbao Jinyuan Tonghui Refinery Co., Ltd. | China | No |
| L'Orfebre S.A. | Andorra | Active |
| LS Nikko Copper Inc | Korea | Yes |
| Luoyang Zijin Yinhui Gold Refinery Co., Ltd. | China | No |
| Marsam Metals | Brazil | Yes |
| Materion | USA | Yes |
| Matsuda Sangyo Co., Ltd. | Japan | Yes |
| Metalor Technologies (Hong Kong) Ltd | China | Yes |
| Metalor Technologies (Singapore) Pte., Ltd. | Singapore | Yes |
| Metalor Technologies (Suzhou) Ltd. | China | Yes |
| Metalor Technologies S.A. | Switzerland | Yes |
| Metalor USA Refining Corporation | USA | Yes |
| Metalurgica Met-Mex Penoles S.A. De C.V. | Mexico | Yes |
| Mitsubishi Materials Corporation | Japan | Yes |
| Mitsui Mining and Smelting Co Ltd | Japan | Yes |
| MMTC-PAMP India Pvt., Ltd. | India | Yes |
| Modeltech Sdn Bhd | Malaysia | Active |
| Morris and Watson | New Zealand | No |
| Morris and Watson Gold Coast | Australia | No |
| Moscow Special Alloys Processing Plant | Russia | Yes |
| Nadir Metal Rafineri San. Ve Tic. A.S. | Turkey | Yes |
| Navoi Mining and Metallurgical Combinat | Uzbekistan | No |

| <u>Smelter/Refiner</u> | <u>Smelter/Refiner Country</u> | <u>RMAP Conformant</u> |
|---|--------------------------------|------------------------|
| Nihon Material Co., Ltd. | Japan | Yes |
| Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH | Austria | Yes |
| Ohura Precious Metal Industry Co., Ltd. | Japan | Yes |
| OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | Russia | Yes |
| OJSC Novosibirsk Refinery | Russia | Yes |
| PAMP S.A. | Switzerland | Yes |
| Pease & Curren | USA | No |
| Penglai Penggang Gold Industry Co., Ltd. | China | No |
| Planta Recuperadora de Metales SpA | Chile | Yes |
| Prioksky Plant of Non-Ferrous Metals | Russia | Yes |
| PT Aneka Tambang (Persero) Tbk | Indonesia | Yes |
| PX Precinox S.A. | Switzerland | Yes |
| Rand Refinery (Pty) Ltd. | South Africa | Yes |
| Remondis Argentina B.V. | Netherlands | Active |
| Republic Metals Corporation | USA | Yes |
| Royal Canadian Mint | Canada | Yes |
| SAAMP | France | Yes |
| Sabin Metal Corp. | USA | No |
| Safimet SPA | Italy | Yes |
| SAFINA A.S. | Czech Republic | Active |
| Sai Refinery | India | No |
| Samduck Precious Metals | Korea | Yes |
| Samwon Metals Corp. | Korea | No |
| SAXONIA Edelmetalle GmbH | Germany | Yes |
| Schone Edelmetaal B.V. | Netherlands | No |
| SEMPSA Joyeria Plateria S.A. | Spain | Yes |
| Shandong Tiancheng Biological Gold Industrial Co., Ltd. | China | No |
| Shandong Zhaojin Gold & Silver Refinery Co., Ltd. | China | Yes |
| Sichuan Tianze Precious Metals Co., Ltd. | China | Yes |
| Singway Technology Co., Ltd. | Taiwan | Yes |
| So Accurate Group Inc | USA | No |
| SOE Shyolkovsky Factory of Secondary Precious Metals | Russia | Yes |
| Solar Applied Materials Technology Corp. | Taiwan | Yes |
| State Research Institute Center for Physical Sciences and Technology | Lithuania | No |
| Sudan Gold Refinery | Sudan | No |
| Sumitomo Metal Mining Co Ltd | Japan | Yes |
| SungEel HiTech | Korea | Yes |
| T.C.A. SPA | Italy | Yes |
| Tanaka Kikinzoku Kogyo K.K | Japan | Yes |
| The Refinery of Shandong Gold Mining Co., Ltd. | China | Yes |
| Tokuriki Honten Co., Ltd. | Japan | Yes |
| Tongling Nonferrous Metals Group Co., Ltd. | China | No |
| Tony Goetz NV | Belgium | No |
| TOO Tau-Ken-Altyn | Kazakhstan | No |
| Torecom | Korea | Yes |
| Umicore Brasil Ltda. | Brazil | Yes |

| <u>Smelter/Refiner</u> | <u>Smelter/Refiner Country</u> | <u>RMAP Conformant</u> |
|---|--|------------------------|
| Umicore Precious Metals Thailand | Thailand | Yes |
| Umicore S.A. Business Unit Precious Metals Refining | Belgium | Yes |
| United Precious Metal Refining, Inc. | USA | No |
| Universal Precious Metals Refining Zambia | Zambia | No |
| Valcambi SA | Switzerland | Yes |
| Western Australian Mint (T/a The Perth Mint) | Australia | Yes |
| WIELAND Edelmetalle GmbH | Germany | Yes |
| Yamamoto Precious Metal Co., Ltd. | Japan | No |
| Yokohama Metal Co., Ltd. | Japan | Yes |
| Yunnan Copper Industry Co., Ltd. | China | No |
| Zhongyuan Gold Smelter of Zhongjin Gold Corporation | China | Yes |
| Tantalum Smelters | | |
| Asaka Riken Co., Ltd. | Japan | Yes |
| Changsha South Tantalum Niobium Co., Ltd. | China | Yes |
| Conghua Tantalum and Niobium Smeltery | China | No |
| D Block Metals, LLC | USA | Yes |
| Duoluoshan | China | No |
| Exotech Inc. | USA | Yes |
| F&X Electro-Materials Ltd. | China | Yes |
| FIR Metals & Resource Ltd. | China | Yes |
| Global Advanced Metals Aizu | Japan | Yes |
| Global Advanced Metals Boyertown | USA | Yes |
| Guangdong Zhiyuan New Material Co., Ltd. | China | Yes |
| H.C. Starck Co., Ltd. | Thailand | Yes |
| H.C. Starck Hermsdorf GmbH | Germany | Yes |
| H.C. Starck Inc. | USA | Yes |
| H.C. Starck Ltd. | Japan | Yes |
| H.C. Starck Smelting GmbH & Co. KG | Germany | Yes |
| H.C. Starck Tantalum and Niobium GmbH | Germany | Yes |
| Hengyang King Xing Lifeng New Materials Co., Ltd. | China | Yes |
| Jiangxi Dinghai Tantalum & Niobium Co., Ltd. | China | Yes |
| Jiangxi Tuohong New Raw Material | China | Yes |
| JiuJiang JinXin Nonferrous Metals Co., Ltd. | China | Yes |
| Jiujiang Nonferrous Metals Smelting Company Limited | China | No |
| Jiujiang Zhongao Tantalum & Niobium Co., Ltd. | China | Yes |
| KEMET Blue Metals | Mexico | Yes |
| KEMET Blue Powder | USA | Yes |
| King-Tan Tantalum Industry Ltd. | China | No |
| LSM Brasil S.A. | Brazil | Yes |
| Metallurgical Products India Pvt., Ltd. | India | Yes |
| Mineracao Taboca S.A. | Brazil | Yes |
| Mitsui Mining and Smelting Co., Ltd. | Japan | Yes |
| Ningxia Orient Tantalum Industry Co., Ltd. | China | Yes |
| NPM Silmet AS | Estonia | Yes |
| Power Resources Ltd. | Macedonia, The Former Yugoslav Republic of | Yes |

| <u>Smelter/Refiner</u> | <u>Smelter/Refiner Country</u> | <u>RMAP Conformant</u> |
|---|----------------------------------|------------------------|
| QuantumClean | USA | Yes |
| Resind Industria e Comercio Ltda. | Brazil | Yes |
| RFH Tantalum Smeltery Co., Ltd./Yanling Jincheng Tantalum & Niobium Co., Ltd. | China | Yes |
| Solikamsk Magnesium Works OAO | Russia | Yes |
| Taki Chemical Co., Ltd. | Japan | Yes |
| Telex Metals | USA | Yes |
| Ulba Metallurgical Plant JSC | Kazakhstan | Yes |
| XinXing HaoRong Electronic Material Co., Ltd. | China | Yes |
| Yichun Jin Yang Rare Metal Co., Ltd. | China | No |
| Tin Smelters | | |
| Alpha | USA | Yes |
| An Thai Minerals Co., Ltd. | Vietnam | No |
| Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | China | Yes |
| China Tin Group Co., Ltd. | China | Yes |
| CNMC (Guangxi) PGMA Co., Ltd. | China | No |
| CV Ayi Jaya | Indonesia | Yes |
| CV Dua Sekawan | Indonesia | Yes |
| CV Gita Pesona | Indonesia | Yes |
| CV Serumpun Sebalai | Indonesia | No |
| CV Tiga Sekawan | Indonesia | No |
| CV United Smelting | Indonesia | Yes |
| CV Venus Inti Perkasa | Indonesia | Yes |
| Dowa | Japan | Yes |
| Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | Vietnam | No |
| Elmet S.L.U. | Spain | No |
| EM Vito | Bolivia (Plurinational State of) | Yes |
| Estanho de Rondonia S.A. | Brazil | No |
| Fenix Metals | Poland | Yes |
| Gejiu Fengming Metallurgy Chemical Plant | China | Yes |
| Gejiu Jinye Mineral Company | China | Yes |
| Gejiu Kai Meng Industry and Trade LLC | China | Yes |
| Gejiu Non-Ferrous Metal Processing Co., Ltd. | China | Yes |
| Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | China | Yes |
| Gejiu Zili Mining And Metallurgy Co., Ltd. | China | No |
| Guangdong Hanhe Non-Ferrous Metal Co., Ltd. | China | Yes |
| Guanyang Guida Nonferrous Metal Smelting Plant | China | Yes |
| HuiChang Hill Tin Industry Co., Ltd. | China | Yes |
| Huichang Jinshunda Tin Co., Ltd. | China | Yes |
| Jiangxi Ketai Advanced Material Co Ltd | China | Yes |
| Magnu's Minerais Metais e Ligas Ltda. | Brazil | Yes |
| Malaysia Smelting Corporation | Malaysia | Yes |
| Melt Metais e Ligas S.A. | Brazil | Yes |
| Metallic Resources, Inc. | USA | Yes |
| Metallo Belgium N.V. | Belgium | Yes |

| <u>Smelter/Refiner</u> | <u>Smelter/Refiner Country</u> | <u>RMAP Conformant</u> |
|--|----------------------------------|------------------------|
| Metallo Spain SLU | Spain | Yes |
| Mineracao Taboca S.A. | Brazil | Yes |
| Minsur | Peru | Yes |
| Mitsubishi Materials Corporation | Japan | Yes |
| Modeltech Sdn Bhd | Malaysia | No |
| Nankang Nanshan Tin Manufactory Co Ltd | China | No |
| Nghe Tinh Non-Ferrous Metals Joint Stock Company | Vietnam | No |
| O.M. Manufacturing (Thailand) Co., Ltd. | Thailand | Yes |
| O.M. Manufacturing Philippines, Inc. | Philippines | Yes |
| Operaciones Metalurgical S.A. | Bolivia (Plurinational State of) | Yes |
| PT Aries Kencana Sejahtera | Indonesia | Yes |
| PT Artha Cipta Langgeng | Indonesia | Yes |
| PT ATD Makmur Mandiri Jaya | Indonesia | Yes |
| PT Babel Inti Perkasa | Indonesia | Yes |
| PT Bangka Prima Tin | Indonesia | Yes |
| PT Bangka Tin Industry | Indonesia | Yes |
| PT Belitung Industri Sejahtera | Indonesia | Yes |
| PT Bukit Timah | Indonesia | Yes |
| PT Cipta Persada Mulia | Indonesia | No |
| PT DS Jaya Abadi | Indonesia | Yes |
| PT Eunindo Usaha Mandiri | Indonesia | Yes |
| PT Inti Stania Prima | Indonesia | Yes |
| PT Justindo | Indonesia | No |
| PT Karimun Mining | Indonesia | Yes |
| PT Kijang Jaya Mandiri | Indonesia | Yes |
| PT Lautan Harmonis Sejahtera | Indonesia | Yes |
| PT Menara Cipta Mulia | Indonesia | Yes |
| PT Mitra Stania Prima | Indonesia | Yes |
| PT O.M. Indonesia | Indonesia | No |
| PT Panca Mega Persada | Indonesia | Yes |
| PT Prima Timah Utama | Indonesia | Yes |
| PT Refined Bangka Tin | Indonesia | Yes |
| PT Sariwiguna Binasentosa | Indonesia | Yes |
| PT Stanindo Inti Perkasa | Indonesia | Yes |
| PT Sukses Inti Makmur | Indonesia | Yes |
| PT Sumber Jaya Indah | Indonesia | Yes |
| PT Timah (Persero) Tbk Kundur | Indonesia | Yes |
| PT Timah (Persero) Tbk Mentok | Indonesia | Yes |
| PT Tinindo Inter Nusa | Indonesia | Yes |
| PT Tommy Utama | Indonesia | Yes |
| Resind Industria e Comercio Ltda. | Brazil | Yes |
| Rui Da Hung | Taiwan | Yes |
| Soft Metais Ltda. | Brazil | Yes |
| Super Ligas | Brazil | No |
| Thaisarco | Thailand | Yes |
| Tuyen Quang Non-Ferrous Metals Joint Stock Company | Vietnam | No |
| White Solder Metalurgia e Mineracao Ltda. | Brazil | Yes |

| <u>Smelter/Refiner</u> | <u>Smelter/Refiner Country</u> | <u>RMAP Conformant</u> |
|---|--------------------------------|------------------------|
| Yunnan Chengfeng Non-ferrous Metals Co Ltd | China | Yes |
| Yunnan Tin Company Ltd | China | Yes |
| Tungsten Smelters | | |
| A.L.M.T. TUNGSTEN Corp. | Japan | Yes |
| ACL Metais Eireli | Brazil | Yes |
| Asia Tungsten Products Vietnam Ltd. | Vietnam | Yes |
| Chenzhou Diamond Tungsten Products Co., Ltd. | China | Yes |
| Chongyi Zhangyuan Tungsten Co., Ltd. | China | Yes |
| Fujian Jinxin Tungsten Co., Ltd. | China | Yes |
| Ganzhou Haichuang Tungsten Industry Co., Ltd. | China | No |
| Ganzhou Huaxing Tungsten Products Co., Ltd. | China | Yes |
| Ganzhou Jiangwu Ferrotungsten Co., Ltd. | China | Yes |
| Ganzhou Seadragon W & Mo Co., Ltd. | China | Yes |
| Ganzhou Yatai Tungsten Co., Ltd. | China | No |
| Global Tungsten & Powders Corp. | USA | Yes |
| Guangdong Xianglu Tungsten Co., Ltd. | China | Yes |
| H.C. Starck Smelting GmbH & Co. KG | Germany | Yes |
| H.C. Starck Tungsten GmbH | Germany | Yes |
| Hunan Chenzhou Mining Co., Ltd. | China | Yes |
| Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji | China | Yes |
| Hunan Chunchang Nonferrous Metals Co., Ltd. | China | Yes |
| Hunan Litian Tungsten Industry Co., Ltd. | China | No |
| Hydrometallurg, JSC | Russia | Yes |
| Japan New Metals Co., Ltd. | Japan | Yes |
| Jiangwu H.C. Starck Tungsten Products Co., Ltd. | China | Yes |
| Jiangxi Dayu Longxintai Tungsten Co., Ltd. | China | No |
| Jiangxi Gan Bei Tungsten Co., Ltd. | China | Yes |
| Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. | China | No |
| Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | China | Yes |
| Jiangxi Xinsheng Tungsten Industry Co., Ltd. | China | Yes |
| Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd. | China | Yes |
| Jiangxi Yaosheng Tungsten Co., Ltd. | China | Yes |
| Kennametal Fallon | USA | Yes |
| Kennametal Huntsville | USA | Yes |
| Malipo Haiyu Tungsten Co., Ltd. | China | Yes |
| Moliren Ltd. | Russia | Yes |
| Niagara Refining LLC | USA | Yes |
| Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC | Vietnam | Yes |
| Philippine Chuangxin Industrial Co., Inc. | Philippines | Yes |
| South-East Nonferrous Metal Company Limited of Hengyang City | China | Yes |
| Tejing (Vietnam) Tungsten Co., Ltd. | Vietnam | Yes |
| Unecha Refractory metals plant | Russia | Yes |
| Vietnam Youngsun Tungsten Industry Co., Ltd. | Vietnam | Yes |
| Wolfram Bergbau und Hutten AG | Austria | Yes |
| Woltech Korea Co., Ltd. | Korea | Yes |
| Xiamen Tungsten (H.C.) Co., Ltd. | China | Yes |

| <u>Smelter/Refiner</u> | <u>Smelter/Refiner Country</u> | <u>RMAP Conformant</u> |
|---|--------------------------------|------------------------|
| Xiamen Tungsten Co., Ltd. | China | Yes |
| Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd. | China | Yes |
| Xinhai Rendan Shaoguan Tungsten Co., Ltd. | China | Yes |

The Company notes the following in connection with the information contained in the foregoing table:

(a) The smelters and refiners listed in the table were identified by the Covered Vendors as potentially being part of the Company's 2017 supply chain. However, not all of the included smelters and refiners may be part of the Company's supply chain. In addition, the smelters and refiners listed above may not be all of the smelters and refiners in its supply chain, as many Covered Vendors indicated that they were unable to identify all of the smelters and refiners used to process the necessary 3TG content contained in their products and not all of the Covered Vendors responded to the Company's inquiries.

(b) All compliance status information in the table is as of May 7, 2018.

(c) "Conformant" means that a smelter or refiner was listed as conformant with the RMAP assessment protocols, including through mutual recognition and those indicated as "Re-audit in process." Included smelters and refiners were not necessarily Conformant for all or part of 2017 and may not maintain that status in any future period.

(d) "Active" means that the smelter or refiner is a participant in the RMAP and has committed to undergo an audit or is participating in a cross-recognized certification program.

(e) "No" means that the smelter or refiner is not Conformant or Active.

(f) The RMAP status and smelter or refiner country location indicated in the table is based on information published by the RMI, without independent verification by us.

Country of Origin Information

The countries of origin of the 3TG processed by the Conformant smelters and refiners listed in the table above may have included the countries in the categories listed below, based on information made available by the RMI to its members. The Company has not been able to reliably determine the country of origin of any of the other smelters or refiners listed in the table. The countries below are categorized by risk level.

L1—Countries that are not identified as conflict regions or plausible areas of smuggling or export from the DRC and its nine adjoining countries: Argentina, Australia, Austria, Benin, Bolivia, Brazil, Burkina Faso, Cambodia, Canada, Chile, China, Colombia, Ecuador, Eritrea, Ethiopia, France, Germany, Ghana, Guatemala, Guinea, Guyana, Honduras, India, Indonesia, Japan, Kazakhstan, Laos, Madagascar, Malaysia, Mali, Mexico, Mongolia, Myanmar, Namibia, Nicaragua, Nigeria, Panama, Peru, Portugal, Russian Federation, Senegal, Sierra Leone, Spain, Thailand, Togo, United Kingdom, United States of America, Uzbekistan, Vietnam and Zimbabwe.

L2—Countries that are known or plausible countries for smuggling, export out of region or transit of materials containing 3TG: Mozambique and South Africa.

L3—The covered region: Burundi, Rwanda and Uganda.

DRC—The Democratic Republic of the Congo.

Alternatively, or in addition, some of the Conformant smelters and refiners may have sourced from recycled or scrap sources.