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

FORM SD

Specialized Disclosure Report

Philip Morris International Inc.

(Exact name of registrant as specified in its charter)

Virginia

(State or other jurisdiction
of incorporation)

1-33708

(Commission
File Number)

13-3435103

(I.R.S. Employer
Identification No.)

120 Park Avenue, New York, New York

(Address of principal executive offices)

10017-5592

(Zip Code)

Massimo Andolina

Senior Vice President Operations PMI

+41 (58) 242 6710

(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 and 1.02 Conflict Minerals Disclosure and Report

This Specialized Disclosure Report (“Form SD”) for Philip Morris International Inc. (“PMI”) is provided in accordance with Rule 13p-1 under the Securities Exchange Act of 1934 (“Rule 13p-1”) for the reporting period from January 1, 2019 to December 31, 2019. A copy of the Conflict Minerals Report is attached as Exhibit 1.01 to this Form SD and is also publicly available on PMI’s website at <https://www.pmi.com/home/our-views-and-standards/standards/transparency>.

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 Item 1.01 and 1.02 of this Form SD.](#)

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 undersigned hereunto duly authorized.

PHILIP MORRIS INTERNATIONAL INC.

By: /s/ MASSIMO ANDOLINA
Name: Massimo Andolina

Title: Senior Vice President, Operations

DATE: May 28, 2020

CONFLICT MINERALS REPORT OF PHILIP MORRIS INTERNATIONAL INC. FOR THE YEAR ENDED DECEMBER 31, 2019¹**INTRODUCTION**

Philip Morris International Inc. is a Virginia holding company incorporated in 1987. Our subsidiaries and affiliates and their licensees are engaged in the manufacture and sale of cigarettes, other tobacco products and other nicotine-containing products in markets outside of the United States of America.

This Conflict Minerals Report (the “Report”) is provided in accordance with Rule 13p-1 under the Securities Exchange Act of 1934 (“Rule 13p-1”) for the reporting period from January 1 to December 31, 2019.

Conflict Minerals are defined by the Securities and Exchange Commission (“SEC”) as cassiterite, columbite-tantalite, wolframite and gold, and their derivatives, which are limited to tin, tantalum and tungsten (collectively, “3TGs”). During the reporting period, we contracted to manufacture the following products:

- Platform 1 - a precisely controlled heating device incorporating our *IQOS HeatControl* Technology, commercialized under the *IQOS* brand name, into which a specially designed and proprietary tobacco unit is inserted and heated to create an aerosol, as well as related accessories and parts; and
- Platform 4 - battery powered e-vapor products that produce an aerosol by vaporizing a nicotine-containing liquid solution; the current generation technology products, commercialized under the *Nicocigs* and *Vivid* brand names, and the new e-vapor technology products, commercialized using the *IQOS MESH* brand name.

In this report, we refer to Platform 1 and Platform 4 products as “Covered Products.”

In 2019, we sourced the Covered Products from only four direct suppliers (the “Direct Suppliers”). The electronic components of the Covered Products contain one or more 3TGs; such 3TGs are necessary for the functionality or production of the Covered Products.

¹ In this report, “PMI,” “Company,” “we,” “us,” and “our” refers to Philip Morris International Inc. and its subsidiaries. Trademarks and science marks in this report are the intellectual property of, or licensed by, the subsidiaries of Philip Morris International Inc. and are italicized.

We have implemented policies, procedures and a due diligence process to determine whether any of the 3TGs contained in the Covered Products are sourced from the Democratic Republic of the Congo (“DRC”) or any of its adjoining countries (“Covered Countries”) and finance armed conflict in the region. In order to support the economic activity in the region, we have communicated to our Direct Suppliers that we do not discourage them from sourcing 3TGs from the Covered Countries under our Conflict Minerals Policy (“Policy”), so long as they are determined to be “DRC conflict-free.”

We are far removed from the sources of ores from which the 3TGs contained in the Covered Products are procured and the smelters and refiners that process those ores (“SORs”). Therefore, the efforts to identify the countries of origin for the 3TGs reflect both (i) our downstream position in the supply chain²; and (ii) the applicable OECD guidance described below.

DUE DILIGENCE MEASURES

A. Design of Our Due Diligence Measures

Our Conflict Minerals due diligence was performed in line with the internationally recognized due diligence framework provided by 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 (the “OECD Guidance”), as applicable for 3TGs and downstream companies (as the term “downstream companies” is defined in the OECD Guidance). Our due diligence measures in relation to Covered Products included:

1. Establishing Company management systems and forming a dedicated cross-functional team for carrying out Conflict Minerals supply chain due diligence and reporting compliance;
2. Identifying and assessing Conflict Minerals risks in our supply chain;
3. Designing and implementing strategies to respond to Conflict Minerals risks to the extent identified;
4. Encouraging the reliance by our Direct Suppliers on an independent third-party audit protocol for assessing the due diligence practices of SORs relevant to Covered Products; and
5. Reporting on our supply chain due diligence activities, as required by Rule 13p-1.

² As a result of our downstream position in the supply chain, our due diligence processes are based on the necessity of seeking data from our Direct Suppliers and those suppliers seeking similar information in their respective supply chains to identify the original sources of the applicable Conflict Minerals. We also rely, to a large extent, on information collected and provided by third-party validation programs. Such sources may yield inaccurate or incomplete information.

B. Due Diligence Program Elements

1. Management Systems

Conflict Minerals Policy

We adopted our Conflict Minerals Policy and communicated it to our Direct Suppliers to help achieve responsible sourcing of 3TGs in our supply chain. We are committed to operating with integrity and are focused on the responsible sourcing of 3TGs. Our Policy is subject to regular reviews, is attached to this Report as Appendix A, and is publicly available on our website at: <https://www.pmi.com/principles-and-positions/standards/transparency>.

Internal Team

Under the oversight of our Senior Vice President, Operations, we have a cross-functional conflict minerals team, with the expertise in sourcing, operations, sustainability, investor relations, finance and law. In addition, the conflict minerals team has access to specialists working in various functions throughout PMI.

The conflict minerals team has the overall responsibility for developing and implementing our Conflict Minerals compliance strategy, as well as for reviewing the ongoing progress and effectiveness of the Conflict Minerals reporting.

As part of our organizational framework, our Product Stewardship Team verifies ingredients and materials used in our direct materials. During this process, any Conflict Minerals reporting and compliance issues are analyzed and addressed by the conflict minerals team.

Members of the team also interact with our Direct Suppliers to further improve the quality of the Conflict Minerals reporting.

Our senior management is informed of the results of our due diligence efforts, supply chain integrity and relationships with our Direct Suppliers.

Control System and Supply Chain Transparency

PMI's control system and supply chain transparency combines internal activities, collaboration with our Direct Suppliers and reliance on the information published by industry programs such as the Responsible Minerals Initiative ("RMI").

We relied on the RMI Conflict Minerals Reporting Template ("CMRT") that was sent to our Direct Suppliers to collect and retain the necessary information on the chain of custody of the 3TGs contained in the Covered Products, including information about the SORs.

The CMRT is generally regarded as the most widely-used standard form to collect information about Conflict Minerals through the supply chain and was developed by several of the world's leading consumer electronics companies.

Supplier Engagement and Other Compliance Efforts

Our agreements pertaining to the supply of Covered Products include Conflict Minerals-related provisions that are consistent with our Policy, and that recognize the need for cooperation by our Direct Suppliers in respect of Conflict Minerals reporting. We require our Direct Suppliers to comply with our due diligence requests and encourage them to participate in industry-wide or material-specific supply chain mapping initiatives.

In addition, as we stated in the Conflict Minerals report for the period ended December 31, 2018 (the "2018 Report"), in 2019 we undertook the following efforts to further improve due diligence and supplier engagement:

- We continue to train our employees on compliance with our Conflict Minerals policy and the underlying regulations. In 2018, we rolled out standardized web-based employee training programs that address various procurement activities, including the sourcing of minerals, which are now available to our employees worldwide and are mandatory for those employees who are responsible for procurement. In 2019, we also conducted workshops for our supply chain employees that covered the sourcing of minerals, achieving approximately 80% attendance.
- Our employees continued to communicate our Policy and our Responsible Sourcing Principles to our Direct Suppliers, our commitment to responsible sourcing, compliance expectations and information requirements, including grievance mechanisms. These communications focused on improving and continuing to maintain the understanding of the Conflict Minerals regulation in our Direct Suppliers' supply chain, reviewing the due diligence process in terms of accuracy and timeliness of responses, and fostering efforts to further improve compliance. In 2019, we continued to see satisfactory levels of both timeliness and completeness of the information submitted to us by our Direct Suppliers.
- In 2019, we provided training on our Policy and Responsible Sourcing Principles to our Direct Suppliers. In particular, we hosted a Responsible Sourcing Principles workshop session for our Direct Suppliers.
- In 2019, we implemented a supplier due diligence platform to assess our suppliers' compliance with the Responsible Sourcing Principles, which also covers the responsible sourcing of minerals. Suppliers who supply materials containing 3TGs are required to answer questions regarding their processes.
- We have communicated to our Direct Suppliers our expectation that for the manufacture of the Covered Products they should increasingly use SORs certified as "conflict-free" through the available third-party validation mechanisms ("Compliant SORs"), and have held in-person meetings with our Direct Suppliers to reinforce this expectation. For the 2019 fiscal year, all four Direct Suppliers reported that they used Compliant or Active smelters for the relevant Covered Products during the period covered in this Report.³ Please see Section C for additional information.

³ RMI defines an SOR as Active if it participates in the Responsible Minerals Assurance Process and has committed to undergo an audit with RMI or a cross-recognized certification entity. Upon successful completion of the audit, such SORs become Compliant SORs.

Grievance Mechanism

We have a grievance mechanism that allows our employees to report any suspected violation of PMI's principles and practices to the senior management or the Ethics & Compliance Department. Reports can be made through face-to-face discussions or via email if the employee prefers to remain anonymous. We maintain both a dedicated email address: PMI.Compliance@pmi.com, and an independently operated and confidential Compliance Helpline, that operates a phone line and a weblines. Concerns can also be reported by our employees confidentially or anonymously. Any such reports are to be forwarded to the Conflict Minerals Team that will review them and help design appropriate response measures. In addition, we encourage our suppliers to establish their own grievance mechanisms.

Maintain Records

We have a records retention policy applicable to Conflict Minerals-related documentation that provides for the retention of relevant records for prescribed periods.

2. Identify and Assess Risk in the Supply Chain

We reviewed the answers to the CMRT received from our Direct Suppliers and assessed their completeness, clarity and consistency. We worked with our Direct Suppliers to understand their due diligence process, confirmed that they have established a Conflict Minerals policy and obtained a list of SORs in their respective supply chains for the Covered Products.

Our Direct Suppliers confirmed that some of the SORs in their supply chain may source 3TGs from the Covered Countries and that the 3TGs may not be from recycled or scrap sources. As part of our risk assessment, we checked whether these SORs were Compliant SORs by comparing the facilities identified by our Direct Suppliers against the list provided by the RMI and its Responsible Minerals Assurance Process ("RMAP") as well as the list provided by the London Bullion Market Association ("LBMA"). We also followed up with additional information requests to obtain the necessary details to better assess the reliability of the responses and the risks in our supply chain in instances where the responses received were not clear or where the SORs were not certified "conflict-free" through the available third-party validation mechanisms.

Please also see Section B.1 for the discussion of our efforts in 2019 to help identify and assess risk in our supply chain.

3. Design and Implement a Strategy to Respond to Risks in the Supply Chain

We designed a strategy to respond to risks in our supply chain. When the Conflict Minerals Team becomes aware that the due diligence of our direct or indirect suppliers needs improvement, it provides feedback, asks clarifying questions and demands corrective actions where necessary. The Conflict Minerals Team has and will continue to provide information and training to our Direct Suppliers and will determine appropriate follow-up actions, if any, to mitigate any identified risks. Follow-up actions may include, but are not limited to, finding alternate sources of supply or terminating existing supplier relationships, as appropriate. We have encouraged our Direct Suppliers to further implement, and require their suppliers to implement, the due diligence standards that reflect the OECD guidance. Steps to improve the accuracy of the due diligence process are described in Sections B.1 above and D below. For 2019, we found no instances where it was necessary to find replacement sources of supply of Covered Products or terminate a supplier relationship due to a failure to comply with Conflict Minerals requirements. To the extent we expand our supplier base for the relevant products, Conflict Minerals compliance, commitment and readiness are among our criteria for selecting new suppliers.

4. Independent Third Party Audit of Supply Chain Due Diligence at Identified Points in the Supply Chain

We rely on the RMI's Responsible Minerals Assurance Process for the performance of third-party audits of SORs. To the extent possible, we review whether any 3TGs sourced from the Covered Countries are "DRC conflict-free" based on the information provided by our Direct Suppliers and the information available on the RMI's website. We encourage our suppliers to support industry organizations' efforts to ensure that smelters' due diligence sourcing practices are audited by independent third party auditors.

5. Report on Supply Chain Due Diligence

This Report will be filed with the SEC and is publicly available at <https://www.pmi.com/principles-and-positions/standards/transparency>.

C. Reasonable Country of Origin Inquiry ("RCOI") and Due Diligence on the Source and Chain of Custody

We asked our Direct Suppliers to provide answers to the CMRT to ascertain whether the 3TGs contained in the Covered Products originated from Covered Countries. Based on the evaluation of our Direct Suppliers' responses to their CMRT, we had reasons to believe that some of the 3TGs in the Covered Products manufactured in 2019 may have originated in the Covered Countries and were not entirely from recycled or scrap sources.

Through the CMRT, our Direct Suppliers informed us that: (i) 100% of their suppliers provided responses to the CMRT; (ii) 3TGs contained in some Covered Products may have originated from the Covered Countries; (iii) 3TGs contained in Covered Products are not entirely from recycled or scrap sources; (iv) 100% of the SORs supplying 3TGs contained in the Covered Products and their locations were identified and reported; and (v) our Direct Suppliers reported that they used Compliant or Active smelters for the respective Covered Products with the exceptions described below. We compared the facilities that the Direct Suppliers identified in their respective CMRTs to the list of SORs that are certified as "conflict-free" with the RMI and the LBMA. While two SORs identified by one of our Direct Suppliers were not on the RMI list of Compliant SORs at the time of our review, we followed up with the relevant Direct Supplier and were informed by such Direct Supplier that the SORs were Active SORs during the reporting period.⁴

⁴RMI defines an SOR as Active if it participates in the Responsible Minerals Assurance Process and has committed to undergo an audit with RMI or a cross-recognized certification entity. Upon successful completion of such audit, such SORs would become Compliant SORs.

D. Steps to Further Improve Due Diligence

We plan to concentrate on the following steps in the future:

- Continue to engage with our Direct Suppliers to communicate our expectation that they should increasingly source minerals for our products from Compliant SORs;
- Encourage our Direct Suppliers to further strengthen due diligence efforts consistent with the OECD guidance, thereby improving the quality and completeness of supply chain information available to us;
- Continue to mandate conflict minerals due diligence based on OECD guidance and training as a prerequisite to engagement with any new direct suppliers of electronics;
- Encourage our Direct Suppliers to continue to enforce their respective Conflict Minerals policies;
- Continue to communicate and provide training on our Policy, grievance mechanism requirements, compliance expectations and information to our present and future direct suppliers;
- Continue engagement with our Direct Suppliers to review measures for improvement of the due diligence process;
- Continue to use our supplier due diligence platform to determine our Direct Suppliers' compliance with our RSPs;
- Continue communicating our conflict minerals guidance to our Direct Suppliers; and
- Continue training our employees, specifically, through our standardized web-based programs, such training to continue to be mandatory for all employees responsible for procurement and those in related supporting roles.

E. Independent Private Sector Audit

Pursuant to Rule 13p-1, an independent private sector audit is not required for this Report.

Appendix A - Conflict Minerals Policy

The United States Securities and Exchange Commission (SEC) requires our company to disclose if our products contain certain minerals (gold, tin, tungsten, and tantalum) that:

- originate in the Democratic Republic of the Congo (DRC) or an adjoining country
- contribute to the financing of armed groups that are committing human rights abuses

These minerals are known as conflict minerals. PMI's policy and due diligence process on the use of conflict minerals is not to knowingly procure conflict minerals that originate from the DRC or an adjoining country – and we ask our direct suppliers to undertake reasonable due diligence with their supply chains to assure the same – unless those minerals are determined to be “conflict-free.”

Appendix B - List of SORs identified by our Direct Suppliers as part of the supply chain for Covered Products⁵

Subject Mineral	Smelter or Refiner Name	Country Location of Smelter or Refiner
Gold	Metalor Technologies (Suzhou) Ltd.*	CHINA
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd. *	CHINA
Gold	8853 S.p.A. *	ITALY
Gold	Advanced Chemical Company*	UNITED STATES OF AMERICA
Gold	Aida Chemical Industries Co., Ltd. *	JAPAN
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 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	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	CCR Refinery - Glencore Canada Corporation*	CANADA
Gold	Cendres + Metaux S.A. *	SWITZERLAND
Gold	Chimet S.p.A. *	ITALY
Gold	Chugai Mining*	JAPAN
Gold	DSC (Do Sung Corporation) *	SOUTH KOREA
Gold	DODUCO Contacts and Refining GmbH*	GERMANY
Gold	Dowa*	JAPAN
Gold	DS PRETECH Co., Ltd. *	SOUTH KOREA
Gold	Eco-System Recycling Co., Ltd. *	JAPAN
Gold	Emirates Gold DMCC*	UNITED ARAB EMIRATES
Gold	OJSC Novosibirsk Refinery*	RUSSIAN FEDERATION
Gold	Geib Refining Corporation*	UNITED STATES OF AMERICA
Gold	HeeSung Metal Ltd. *	SOUTH KOREA
Gold	Heimerle + Meule GmbH*	GERMANY
Gold	Heraeus Metals Hong Kong Ltd. *	CHINA
Gold	Heraeus Precious Metals GmbH & Co. KG*	GERMANY
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 Uralsmet*	RUSSIAN FEDERATION
Gold	JX Nippon Mining & Metals Co., Ltd. *	JAPAN
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	Korea Zinc Co., Ltd. *	SOUTH KOREA
Gold	Kyrgyzaltyn JSC*	KYRGYZSTAN
Gold	L'Orfebre S.A. *	ANDORRA
Gold	LS-NIKKO Copper Inc. *	SOUTH KOREA
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 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	MMTC-PAMP India Pvt., Ltd. *	INDIA
Gold	Moscow Special Alloys Processing Plant*	RUSSIAN FEDERATION
Gold	Nadir Metal Rafineri San. Ve Tic. A.S. *	TURKEY
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 Krastsvetmet) *	RUSSIAN FEDERATION
Gold	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	Rand Refinery (Pty) Ltd. *	SOUTH AFRICA
Gold	REMONDIS PMR B.V. *	NETHERLANDS
Gold	Royal Canadian Mint*	CANADA
Gold	SAAMP*	FRANCE
Gold	Safimet S.p.A*	ITALY
Gold	Samduck Precious Metals*	SOUTH KOREA
Gold	SAXONIA Edelmetalle GmbH*	GERMANY
Gold	SEMPSA Joyeria Plateria S.A. *	SPAIN
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	Sumitomo Metal Mining Co., Ltd. *	JAPAN
Gold	SungEel HiMetal Co., Ltd. *	SOUTH KOREA
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	Torecom*	SOUTH KOREA
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 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	Gold Refinery of Zijin Mining Group Co., Ltd. *	CHINA
Gold	SAFINA A.S. **	CZECHIA
Gold	Al Etihad Gold Refinery DMCC*	UNITED ARAB EMIRATES
Gold	TOO Tau-Ken-Altyn*	KAZAKHSTAN
Gold	Eco-System Recycling Co., Ltd. North Plant*	JAPAN
Gold	Eco-System Recycling Co., Ltd. West Plant*	JAPAN
Tantalum	Asaka Riken Co., Ltd. *	JAPAN
Tantalum	Changsha South Tantalum Niobium Co., Ltd. *	CHINA
Tantalum	Guangdong Rising Rare Metals-EO Materials 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 Zhiyuan New Material Co., Ltd. *	CHINA
Tantalum	H.C. Starck Co., Ltd. *	THAILAND
Tantalum	H.C. Starck Tantalum and Niobium GmbH*	GERMANY
Tantalum	H.C. Starck Hermsdorf GmbH*	GERMANY
Tantalum	H.C. Starck Inc. *	UNITED STATES OF AMERICA
Tantalum	H.C. Starck Ltd. *	JAPAN
Tantalum	H.C. Starck Smelting GmbH & Co. KG*	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 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 OF AMERICA
Tantalum	LSM Brasil S.A. *	BRAZIL
Tantalum	Metallurgical Products India Pvt., Ltd. *	INDIA
Tantalum	Mineracao Taboca S.A. *	BRAZIL
Tantalum	Mitsui Mining and Smelting Co., Ltd. *	JAPAN
Tantalum	NPM Silmet AS*	ESTONIA
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd. *	CHINA
Tantalum	Power Resources Ltd. *	NORTH MACEDONIA
Tantalum	QuantumClean*	UNITED STATES OF AMERICA
Tantalum	Resind Industria e Comercio Ltda. *	BRAZIL
Tantalum	RFH Tantalum Smeltery Co., Ltd./Yanling Jincheng Tantalum & Niobium Co., Ltd. *	CHINA
Tantalum	Solikamsk Magnesium Works OAO*	RUSSIAN FEDERATION
Tantalum	Taki Chemical Co., Ltd. *	JAPAN
Tantalum	Telex Metals*	UNITED STATES OF AMERICA
Tantalum	Ulba Metallurgical Plant JSC*	KAZAKHSTAN

Tantalum	XinXing HaoRong Electronic Material Co., Ltd. *	CHINA
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd. *	CHINA
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd. *	CHINA
Tin	Yunnan Tin Company Limited*	CHINA
Tin	Alpha*	UNITED STATES OF AMERICA
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. *	CHINA
Tin	Chifeng Dajingzi Tin Industry Co., Ltd. *	CHINA
Tin	China Tin Group Co., Ltd. *	CHINA
Tin	CV Ayi Jaya*	INDONESIA
Tin	CV Dua Sekawan*	INDONESIA
Tin	CV Gita Pesona*	INDONESIA
Tin	PT Aries Kencana Sejahtera*	INDONESIA
Tin	PT Rajehan Ariq*	INDONESIA
Tin	CV United Smelting*	INDONESIA
Tin	CV Venus Inti Perkasa*	INDONESIA
Tin	Dowa*	JAPAN
Tin	Metallo Spain S.L.U. *	SPAIN
Tin	EM Vinto*	BOLIVIA
Tin	Fenix Metals*	POLAND
Tin	Gejiu Fengming Metallurgy Chemical Plant*	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	Gejiu Kai Meng Industry and Trade LLC*	CHINA
Tin	Ma'anshan Weitai Tin Co., Ltd. *	CHINA
Tin	Magnu's Minerai Metals e Ligas Ltda. *	BRAZIL
Tin	Malaysia Smelting Corporation (MSC) *	MALAYSIA
Tin	Melt Metais e Ligas S.A. *	BRAZIL
Tin	Metallic Resources, Inc. *	UNITED STATES OF AMERICA
Tin	Metallo Belgium N.V. *	BELGIUM
Tin	Mineracao Taboca S.A. *	BRAZIL
Tin	Minsur*	PERU
Tin	Mitsubishi Materials Corporation*	JAPAN
Tin	Jiangxi New Nanshan Technology Ltd. *	CHINA
Tin	O.M. Manufacturing (Thailand) Co., Ltd. *	THAILAND
Tin	O.M. Manufacturing Philippines, Inc. *	PHILIPPINES
Tin	Operaciones Metalurgicas S.A. *	BOLIVIA
Tin	PT Artha Cipta Langgeng*	INDONESIA
Tin	PT ATD Makmur Mandiri Jaya*	INDONESIA
Tin	PT Babel Inti Perkasa*	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 Menara Cipta Mulia*	INDONESIA
Tin	PT Mitra Stania Prima*	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 Tbk Mentok*	INDONESIA
Tin	PT Tinindo Inter Nusa*	INDONESIA
Tin	PT Tommy Utama*	INDONESIA
Tin	Resind Industria e Comercio Ltda. *	BRAZIL
Tin	Rui Da Hung*	TAIWAN
Tin	Soft Metais Ltda. *	BRAZIL
Tin	Thai Nguyen Mining and Metallurgy Co., Ltd. *	VIETNAM
Tin	Thaisarco*	THAILAND
Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. *	CHINA
Tin	Tin Technology & Refining*	UNITED STATES OF AMERICA
Tin	White Solder Metalurgia e Mineracao Ltda. *	BRAZIL
Tin	Yunnan Yunfan Non-ferrous Metals Co., Ltd. *	CHINA
Tin	PT Premium Tin Indonesia*	INDONESIA
Tin	PT Bangka Serumpun*	INDONESIA
Tin	PT Babel Surya Alam Lestari*	INDONESIA
Tin	PT Karimun Mining*	INDONESIA
Tin	PT Kijang Jaya Mandiri*	INDONESIA
Tin	PT Rajawali Rimba Perkasa*	INDONESIA
Tin	PT Sumber Jaya Indah*	INDONESIA
Tin	PT Tirus Putra Mandiri*	INDONESIA
Tin	PT Lautan Harmonis Sejahtera*	INDONESIA
Tungsten	A.L.M.T. Corp. *	JAPAN
Tungsten	ACL Metais Eireli*	BRAZIL
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd. *	CHINA
Tungsten	Chongyi Zhangyuan Tungsten 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 OF AMERICA
Tungsten	Guangdong Xianglu Tungsten Co., Ltd. *	CHINA
Tungsten	H.C. Starck Tungsten GmbH*	GERMANY
Tungsten	H.C. Starck Smelting GmbH & Co. KG*	GERMANY
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	Hydrometallurg, JSC*	RUSSIAN FEDERATION
Tungsten	Japan New Metals Co., Ltd. *	JAPAN
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd. *	CHINA
Tungsten	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	Kennametal Fallon*	UNITED STATES OF AMERICA

Tungsten	Kennametal Huntsville*	UNITED STATES OF AMERICA
Tungsten	KGETS Co., Ltd. *	SOUTH KOREA
Tungsten	Malipo Haiyu Tungsten Co., Ltd. *	CHINA
Tungsten	Moliren Ltd. *	RUSSIAN FEDERATION
Tungsten	Niagara Refining LLC*	UNITED STATES OF AMERICA
Tungsten	Masan Tungsten Chemical LLC (MTC) *	VIETNAM
Tungsten	Philippine Chuangxin Industrial Co., Inc. *	PHILIPPINES
Tungsten	Tejing (Vietnam) Tungsten Co., Ltd. *	VIETNAM
Tungsten	Unecha Refractory metals plant*	RUSSIAN FEDERATION
Tungsten	Wolfram Bergbau und Hutten AG*	AUSTRIA
Tungsten	Woltech Korea Co., Ltd. *	SOUTH KOREA
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	Asia Tungsten Products Vietnam Ltd. *	VIETNAM
Tungsten	Jiangxi Dayu Longxintai Tungsten Co., Ltd. **	CHINA
Tungsten	Hunan Litian Tungsten Industry Co., Ltd. *	CHINA
Tungsten	Lianyou Metals Co., Ltd. *	TAIWAN

⁵ SORs that were designated, to our knowledge, as Compliant as of December 31, 2019 are marked with an asterisk (unless stated otherwise). SORs that were designated, to our knowledge, as Active as of December 31, 2019 are marked with two asterisks (unless stated otherwise).