# UNITED STATES SECURITIES AND EXCHANGE COMMISSION

|   | SECURITIES  | Washington, D.C. 20549  | VIIVIISSION  |
|---|---|---|--|
|   |   | FORM SD   |  |
|   | SPE   | CIALIZED DISCLOSURE REPORT  |  |
|   | (Exac   | VIEW, INC. et name of registrant as specified in its charter  | n)   |
|   | (2  | or region and acoptenica in the charter   | ,  |
|   | Delaware (State or other jurisdiction of incorporation or organization) | 001-39470<br>(Commission<br>File Number)  | 84-3235065<br>(IRS Employer<br>Identification No.) |
|   | (Ad   | 195 South Milpitas Blvd.<br>Milpitas, California, 95035<br>Idress of principal executive offices, including zip code) |  |
|   | (Name and telephone numb  | Bill Krause<br>Chief Legal Officer<br>(408) 263-9200<br>er, including area code, of the person to contact in conne    | ction with this report.)                           |
|   |   |   |  |
|   | eck the appropriate box to indicate the rule pursuant<br>lies:          | to which this form is being filed, and provide the  | ne period to which the information in this form    |
| X | Rule 13p-1 under the Securities Exchange Act (1                         | 7 CFR 240.13p-1) for the reporting period from  | January 1 to December 31, 2021.                    |
|   | Rule 13q-1 under the Securities Exchange Act (1                         | 7 CFR 240.13q-1) for the fiscal year ended  | <u></u> .  |
|   |   |   |  |

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

## Items 1.01 and 1.02 Conflict Minerals Disclosure and Report, Exhibit

A copy of View, Inc.'s Conflict Minerals Report for the year ended December 31, 2021 is attached as Exhibit 1.01 hereto and is publicly available at investors.view.com.

## Section 3 - Exhibits

## **Item 3.01 Exhibits**

Exhibit 1.01 Conflict Minerals Report of View, Inc. for the year ended December 31, 2021, as required by 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 duly authorized undersigned.

Date: May 27, 2022 View, Inc.

By: /s/ Bill Krause

Name: Bill Krause

Title: Chief Legal Officer

## Conflict Minerals Report of View, Inc. For the Year Ended December 31, 2021

#### Introduction

View, Inc., together with its consolidated subsidiaries ("View," "the Company," "we," "us," and "our"), has prepared this Conflict Minerals Report for the reporting period January 1, 2021 to December 31, 2021 pursuant to Rule 13p-1 under the Securities Exchange Act of 1934, as amended, and the requirements of Form SD (collectively, "the Rules").

Minerals including tantalum, tin, tungsten, and gold ("3TG") are classified as "conflict minerals" and may be necessary to the functionality or production of certain products that we manufacture or contract to manufacture. As such, we are subject to the Rules with respect to those necessary conflict minerals. The Rules require us to conduct, in good faith, a reasonable country of origin inquiry ("RCOI") into those necessary conflict minerals to determine whether they originated in the Democratic Republic of Congo ("DRC") or an adjoining country ("a covered country" and together, the "covered countries") or are from recycled or scrap sources. If, as a result of our RCOI procedures, we know or have reason to believe that any of our necessary conflict minerals originated in one or more of the covered countries and are not from recycled or scrap materials, then we are required to exercise due diligence to determine the source and chain of custody of such conflict minerals.

This Report and Form SD can be found on our website at www.view.com.

## **Company Overview**

View is a technology company that makes buildings smart and connected to improve people's health, productivity and experience, while simultaneously reducing energy consumption. Our market leading innovations and products enable people to lead healthier and more productive lives by allowing in more natural daylight and views while minimizing glare and heat, and simultaneously reducing the building's carbon footprint and energy usage. We have achieved these transformations by designing, manufacturing, and providing electrochromic or "smart" glass panels to which we add a 1 micrometer (approximately 1/100th the thickness of human hair) proprietary electrochromic coating that fundamentally changes the building's thermodynamics and the health of the humans inside it. Through our proprietary network infrastructure, each View Smart Glass window is provided an individual IP-addressable location and when combined with our proprietary software and algorithms, View Smart Glass intelligently adjusts in response to the sun by tinting from clear to dark states, and vice versa. In addition, we now offer a suite of fully integrated, cloud-connected smart-building products that we believe will enable us to further optimize the human experience within buildings.

For further discussion of our products and services, see our definitive proxy statement filed on February 16, 2021, as supplemented on February 23, 2021 (the "Proxy Statement"). The information contained in the Proxy Statement is not incorporated by reference into this Conflict Minerals Report or our Form SD for 2021 and should not be considered part of this Conflict Minerals Report or the associated Form SD.

## **View's Conflict Minerals Policy**

Our goal is to eliminate the use of Conflict Minerals. We are aware that our products contain 3TG metals that are necessary to the functionality or production of those products. To this end, View works with its suppliers to identify the sources of all 3TG metals used in our products. If any of these metals may originate from the Covered Countries, then further investigation is required. We use the tools provided by the Responsible Minerals Initiative ("RMI") to gather information from our suppliers. The information requested includes the name and location of smelters or refiners used to produce the metals, and the origin of the minerals. Our due diligence process and efforts are consistent with the Organization for Economic Co-operation

and Development ("OECD") Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("OECD Guidance").

Our Conflict Minerals Policy can be found on our website at www.view.com.

## **Description of Product Identification and RCOI Processes**

We have concluded that, during 2021, we manufactured and contracted to manufacture products containing certain conflict minerals. As such, we conducted a RCOI process to determine whether any of the conflict minerals originated, or may have originated, in the covered countries and whether such conflict minerals originated from recycled or scrap sources.

We conducted an assessment to determine which of our direct suppliers may be providing components of our products that are likely to contain conflict minerals. We employed a collaborative process to identify the applicable list of components and suppliers to focus our efforts, consulting with members of our supply chain department. We verified with such personnel that the population of components and suppliers was complete and comprehensive for our 2021 procedures. We then identified the list of suppliers that we directly procured materials from ("tier one" or "direct" suppliers) to survey. Three suppliers were confirmed to have supplied products or components to us that contained conflict minerals during the year ended December 31, 2021, all of which responded to our surveys.

#### Results

Leveraging the RMI Conflict Minerals Reporting Template ("CMRT"), our RCOI consisted of surveying tier one suppliers confirmed to have supplied products that contained conflict minerals that were either used to manufacture our smart glass panels or contracted for the manufacturing of our balance of system components. This template includes information regarding the smelters, origins of conflict minerals, supplier due diligence programs, and whether the materials originate from recycled or scrap sources.

As part of reviewing the completed CMRT surveys, responses were reviewed for completeness, reasonableness, and consistency, and we followed up with our suppliers for corrections and clarifications as needed.

Our tier one suppliers performed similar RCOI procedures to identify the chain of custody from their suppliers back to the smelter and country of origin. We relied on the good faith efforts of our tier one suppliers to provide us with reasonable information and representations relating to the smelter and country of origin. The smelter or refiner facilities that may have been used to process our necessary conflict minerals are contained in Annex I. See "Smelter and Refiner Facilities" below for more detail regarding the information contained in Annex I.

Based on the surveys received from our suppliers and the RCOI procedures conducted for our business, we concluded that we had reason to believe that a portion of our necessary conflict minerals originated or may have originated in the covered countries and such necessary conflict minerals may not have been from recycled or scrap sources. Based on this result, we exercised due diligence to determine the source and chain of custody of such conflict minerals as described below.

## Framework Used to Develop Due Diligence Measures

In accordance with the Rules, we undertook due diligence efforts to determine the country, mine, or location of origin and facilities used to produce the conflict minerals used in our products. We designed our due diligence measures to conform in all material respects with the internationally recognized due diligence framework as set forth in the OECD Guidance and related supplements for 3TG.

### Due Diligence Undertaken to Comply with the OECD Framework

Our due diligence process for 2021 included the following steps:

## OECD Step 1: Establish a Company Management System

- We have adopted and communicated our conflict minerals policy both publicly and to relevant internal and external parties, which conflict minerals policy is available at www.view.com, and is not incorporated herein by reference.
- We have an operating, cross-functional internal governance team with representatives from our supply chain, engineering, compliance, and legal departments to ensure policy statements and control processes are followed.
- As described above, we undertook an RCOI with respect to the Conflict Minerals in our supply chain by requesting a CMRT be completed
  by each of our suppliers to gather information about their use of Conflict Minerals, the smelters and refiners in their supply chain that are
  included in our Covered Products, and the countries of origin for such Conflict Minerals.
- Our Code of Conduct contains procedures whereby employees can report violations, including via our anonymous ethics hotline.
- We have a records retention process to ensure retention of conflicts minerals due diligence materials.

#### OECD Step 2: Identify and Assess Risks in Supply Chain

- We conducted our surveys leveraging the CMRT, which were sent to all relevant suppliers considered to be subject to the Rules. We used the CMRT to identify smelter or refiner facilities and countries of origin of our necessary conflict minerals.
- We relied on RMI and other information provided by our suppliers to identify countries of origin for Responsible Minerals Assurance Program ("RMAP") compliant smelter or refiner facilities.
- We reviewed the responses from the CMRT questionnaires with our supply chain department and crosschecked the list with RMAP facilities found at www.responsiblemineralsinitiative.org, which website is not incorporated herein by reference.

## OECD Step 3: Design and Implement a Strategy to Respond to Identified Risks

• As we do not source directly from smelter or refiner facilities, we rely on our direct suppliers to provide us with the necessary information about the source of Conflict Minerals contained in our products. Our suppliers are similarly reliant upon information provided by their suppliers to provide information regarding the country of origin of Conflict Minerals that are included in our products. Thus, there is a risk that the final information provided to us and upon which we rely is incomplete or inaccurate.

## OECD Step 4: Independent Third-Party Audit of Smelter/Refiner Due Diligence Practices

- As we do not source directly from smelter or refiner facilities, we rely on the RMAP to oversee and coordinate third-party audits of these
  facilities. The RMAP audit protocols and procedures were designed by the RMI. These audit protocols and procedures require the smelters
  or refiners to engage specially trained third-party auditors to independently verify that these smelters and refiners can be considered
  conflict free.
- We rely on the publicly available audit results of the RMAP third-party audits to validate the sourcing practices of facilities in our supply chain.

#### OECD Step 5: Report Annually on Supply Chain Due Diligence

• We file a Form SD and Conflict Minerals Report with the Securities and Exchange Commission on an annual basis, as necessary. Our Form SD and Conflict Minerals Report are also available on our website at investors.view.com and is not incorporated herein by reference.

#### **Smelter and Refiner Facilities**

In connection with our RCOI and due diligence efforts, our suppliers provided us with lists of facilities that may have processed the necessary conflict minerals used in our products during 2021. Such facility information is included in Annex I.

## Due Diligence Efforts to Identify Country, Location, and Mine of Origin of Conflict Minerals in Products

After obtaining CMRT forms and related documentation through our RCOI and due diligence processes as described above, we compared the smelters and refiners used by relevant suppliers with the list of smelters and refiners from the RMAP, as well as responses in the CMRT, to gather the country, location, and mine of origin information. We also reviewed public information, to the extent available, in an attempt to verify the mine or location of origin. All of the smelters/refiners on our list have been verified as conformant by the RMAP. Therefore, based on our due diligence efforts, we conclude the Conflict Minerals contained in our Covered Products come from suppliers using smelters or refiners listed as conformant by RMI. However, we rely on our direct suppliers to provide us with the necessary information about the source of Conflict Minerals contained in the Covered Products that we contract with them to manufacture for us and our suppliers are similarly reliant upon information provided by their suppliers. Thus, there is a risk that the final information provided to us and upon which we rely is incomplete or inaccurate.

## ANNEX I

## SMELTER LIST

| Metal    | Smelter Name                                    | Smelter Country          | Status     |
|----------|---|--------------------------|------------|
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd.                | CHINA                    | Conformant |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd.            | CHINA                    | Conformant |
| Tungsten | Ganzhou Haichuang Tungsten Co., Ltd.            | CHINA                    | Conformant |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd.              | CHINA                    | Conformant |
| Tungsten | Global Tungsten & Powders Corp.                 | UNITED STATES OF AMERICA | Conformant |
| Tungsten | Kennametal Huntsville                           | UNITED STATES OF AMERICA | Conformant |
| Tungsten | Hydrometallurg, JSC                             | RUSSIAN FEDERATION       | Conformant |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd.    | CHINA                    | Conformant |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd. | CHINA                    | Conformant |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd.     | CHINA                    | Conformant |
| Tungsten | Jiangxi Tungsten Co Ltd                         | CHINA                    | Conformant |
| Tin      | Minsur  | PERU                     | Conformant |
| Tin      | Mineracao Taboca S.A.                           | BRAZIL                   | Conformant |
| Tin      | PT Timah Tbk Mentok                             | INDONESIA                | Conformant |
| Tin      | Malaysia Smelting Corporation (MSC)             | MALAYSIA                 | Conformant |
| Tin      | PT Timah Tbk Kundur                             | INDONESIA                | Conformant |
| Tin      | PT Mitra Stania Prima                           | INDONESIA                | Conformant |
| Tin      | PT Artha Cipta Langgeng                         | INDONESIA                | Conformant |
| Tin      | Fenix Metals                                    | POLAND                   | Conformant |
| Tin      | Yunnan Tin Company Limited                      | CHINA                    | Conformant |

| Tin      | PT Refined Bangka Tin                           | INDONESIA                        | Conformant |
|----------|---|----------------------------------|------------|
| Tin      | White Solder Metalurgia e Mineracao Ltda.       | BRAZIL                           | Conformant |
| Tin      | PT Menara Cipta Mulia                           | INDONESIA                        | Conformant |
| Tin      | Tin Technology & Refining                       | UNITED STATES OF AMERICA         | Conformant |
| Tin      | EM Vinto  | BOLIVIA (PLURINATIONAL STATE OF) | Conformant |
| Tin      | Thaisarco                                       | THAILAND                         | Conformant |
| Tin      | CV Venus Inti Perkasa                           | INDONESIA                        | Conformant |
| Tin      | Metallo Belgium N.V.                            | BELGIUM                          | Conformant |
| Tin      | Operaciones Metalurgicas S.A.                   | BOLIVIA (PLURINATIONAL STATE OF) | Conformant |
| Tin      | PT Bangka Serumpun                              | INDONESIA                        | Conformant |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd.             | CHINA                            | Conformant |
| Tungsten | Xiamen Tungsten Co., Ltd.                       | CHINA                            | Conformant |
| Gold     | 8853 S.p.A.                                     | ITALY                            | Conformant |
| Gold     | Advanced Chemical Company                       | UNITED STATES OF AMERICA         | Conformant |
| Gold     | Aida Chemical Industries Co., Ltd.              | JAPAN                            | Conformant |
| Gold     | Al Etihad Gold Refinery DMCC                    | UNITED ARAB EMIRATES             | Conformant |
| Gold     | Allgemeine Gold-und Silberscheideanstalt A.G.   | GERMANY                          | Conformant |
| Gold     | Almalyk Mining and Metallurgical Complex (AMMC) | UZBEKISTAN                       | Conformant |
| Gold     | AngloGold Ashanti Corrego do Sitio Mineracao    | BRAZIL                           | Conformant |
| Gold     | Argor-Heraeus S.A.                              | SWITZERLAND                      | Conformant |
| Gold     | Asahi Pretec Corp.                              | JAPAN                            | Conformant |
| Gold     | Asahi Refining Canada Ltd.                      | CANADA                           | Conformant |
| Gold     | Asahi Refining USA Inc.                         | UNITED STATES OF AMERICA         | Conformant |
| Gold     | Asaka Riken Co., Ltd.                           | JAPAN                            | Conformant |
| Gold     | Aurubis AG                                      | GERMANY                          | Conformant |
|          |   |                                  |            |

| , | Gold | Bangalore Refinery  | INDIA                    | Conformant |
|---|------|---|--------------------------|------------|
|   | Gold | Bangko Sentral ng Pilipinas (Central Bank of the Philippines)   | PHILIPPINES              | Conformant |
|   | Gold | Boliden AB  | SWEDEN                   | Conformant |
|   | Gold | C. Hafner GmbH + Co. KG   | GERMANY                  | Conformant |
|   | Gold | CCR Refinery—Glencore Canada Corporation                        | CANADA                   | Conformant |
|   | Gold | Cendres + Metaux S.A.   | SWITZERLAND              | Conformant |
|   | Gold | Chimet S.p.A.   | ITALY                    | Conformant |
|   | Gold | Chugai Mining   | JAPAN                    | Conformant |
|   | Gold | DSC (Do Sung Corporation)                                       | KOREA, REPUBLIC OF       | Conformant |
|   | Gold | DODUCO Contacts and Refining GmbH                               | GERMANY                  | Conformant |
|   | Gold | Dowa  | JAPAN                    | Conformant |
|   | Gold | Eco-System Recycling Co., Ltd. East Plant                       | JAPAN                    | Conformant |
|   | Gold | Eco-System Recycling Co., Ltd. North Plant                      | JAPAN                    | Conformant |
|   | Gold | Eco-System Recycling Co., Ltd. West Plant                       | JAPAN                    | Conformant |
|   | Gold | Emirates Gold DMCC  | UNITED ARAB EMIRATES     | Conformant |
|   | Gold | JSC Novosibirsk Refinery  | RUSSIAN FEDERATION       | Conformant |
|   | Gold | Geib Refining Corporation                                       | UNITED STATES OF AMERICA | Conformant |
|   | Gold | LT Metal Ltd.   | KOREA, REPUBLIC OF       | Conformant |
|   | Gold | Heimerle + Meule GmbH   | GERMANY                  | Conformant |
|   | Gold | Heraeus Metals Hong Kong Ltd.                                   | CHINA                    | Conformant |
|   | Gold | Heraeus Germany GmbH Co. KG                                     | GERMANY                  | Conformant |
|   | Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | CHINA                    | Conformant |
|   | Gold | Ishifuku Metal Industry Co., Ltd.                               | JAPAN                    | Conformant |
|   | Gold | Istanbul Gold Refinery  | TURKEY                   | Conformant |
|   | Gold | Italpreziosi  | ITALY                    | Conformant |
|   |      |   |                          |            |

|      |   | TARAN                    | 6 6        |
|------|---|--------------------------|------------|
| Gold | Japan Mint                                  | JAPAN                    | Conformant |
| Gold | Jiangxi Copper Co., Ltd.                    | CHINA                    | Conformant |
| Gold | JSC Uralelectromed                          | RUSSIAN FEDERATION       | Conformant |
| Gold | JX Nippon Mining & Metals Co., Ltd.         | JAPAN                    | Conformant |
| Gold | Kazzinc                                     | KAZAKHSTAN               | Conformant |
| Gold | Kennecott Utah Copper LLC                   | UNITED STATES OF AMERICA | Conformant |
| Gold | KGHM Polska Miedz Spolka Akcyjna            | POLAND                   | Conformant |
| Gold | Kojima Chemicals Co., Ltd.                  | JAPAN                    | Conformant |
| Gold | Korea Zinc Co., Ltd.                        | KOREA, REPUBLIC OF       | Conformant |
| Gold | Kyrgyzaltyn JSC                             | KYRGYZSTAN               | Conformant |
| Gold | L'Orfebre S.A.                              | ANDORRA                  | Conformant |
| Gold | LS-NIKKO Copper Inc.                        | KOREA, REPUBLIC OF       | Conformant |
| Gold | Marsam Metals                               | BRAZIL                   | Conformant |
| Gold | Materion                                    | UNITED STATES OF AMERICA | Conformant |
| Gold | Matsuda Sangyo Co., Ltd.                    | JAPAN                    | Conformant |
| Gold | Metalor Technologies (Hong Kong) Ltd.       | CHINA                    | Conformant |
| Gold | Metalor Technologies (Singapore) Pte., Ltd. | SINGAPORE                | Conformant |
| Gold | Metalor Technologies (Suzhou) Ltd.          | CHINA                    | Conformant |
| Gold | Metalor Technologies S.A.                   | SWITZERLAND              | Conformant |
| Gold | Metalor USA Refining Corporation            | UNITED STATES OF AMERICA | Conformant |
| Gold | Metalurgica Met-Mex Penoles S.A. De C.V.    | MEXICO                   | Conformant |
| Gold | Mitsubishi Materials Corporation            | JAPAN                    | Conformant |
| Gold | Mitsui Mining and Smelting Co., Ltd.        | JAPAN                    | Conformant |
| Gold | MMTC-PAMP India Pvt., Ltd.                  | INDIA                    | Conformant |
| Gold | Moscow Special Alloys Processing Plant      | RUSSIAN FEDERATION       | Conformant |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.S.      | TURKEY                   | Conformant |
|      |   |                          |            |

| Gold | Navoi Mining and Metallurgical Combinat  | UZBEKISTAN                | Conformant |
|------|--|---------------------------|------------|
| Gold | Nihon Material Co., Ltd.   | JAPAN                     | Conformant |
| Gold | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH                    | AUSTRIA                   | Conformant |
| Gold | Ohura Precious Metal Industry Co., Ltd.  | JAPAN                     | Conformant |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals<br>Plant" (OJSC Krastsvetmet) | RUSSIAN FEDERATION        | Conformant |
| Gold | PAMP S.A.  | SWITZERLAND               | Conformant |
| Gold | Planta Recuperadora de Metales SpA   | CHILE                     | Conformant |
| Gold | Prioksky Plant of Non-Ferrous Metals   | RUSSIAN FEDERATION        | Conformant |
| Gold | PT Aneka Tambang (Persero) Tbk   | INDONESIA                 | Conformant |
| Gold | PX Precinox S.A.   | SWITZERLAND               | Conformant |
| Gold | Rand Refinery (Pty) Ltd.   | SOUTH AFRICA              | Conformant |
| Gold | REMONDIS PMR B.V.  | NETHERLANDS               | Conformant |
| Gold | Royal Canadian Mint  | CANADA                    | Conformant |
| Gold | SAAMP  | FRANCE                    | Conformant |
| Gold | Safimet S.p.A  | ITALY                     | Conformant |
| Gold | SAFINA A.S.  | CZECHIA                   | Conformant |
| Gold | Samduck Precious Metals  | KOREA, REPUBLIC OF        | Conformant |
| Gold | SEMPSA Joyeria Plateria S.A.   | SPAIN                     | Conformant |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.                              | CHINA                     | Conformant |
| Gold | Sichuan Tianze Precious Metals Co., Ltd.                                       | CHINA                     | Conformant |
| Gold | Singway Technology Co., Ltd.   | TAIWAN, PROVINCE OF CHINA | Conformant |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals                           | RUSSIAN FEDERATION        | Conformant |
| Gold | Solar Applied Materials Technology Corp.                                       | TAIWAN, PROVINCE OF CHINA | Conformant |
|      |  |                           |            |

| Gold     | Sumitomo Metal Mining Co., Ltd.                     | JAPAN                    | Conformant |
|----------|---|--------------------------|------------|
| Gold     | SungEel HiMetal Co., Ltd.                           | KOREA, REPUBLIC OF       | Conformant |
| Gold     | T.C.A S.p.A   | ITALY                    | Conformant |
| Gold     | Tanaka Kikinzoku Kogyo K.K.                         | JAPAN                    | Conformant |
| Gold     | Shandong Gold Smelting Co., Ltd.                    | CHINA                    | Conformant |
| Gold     | Tokuriki Honten Co., Ltd.                           | JAPAN                    | Conformant |
| Gold     | TOO Tau-Ken-Altyn                                   | KAZAKHSTAN               | Conformant |
| Gold     | Torecom   | KOREA, REPUBLIC OF       | Conformant |
| Gold     | Umicore Precious Metals Thailand                    | THAILAND                 | Conformant |
| Gold     | Umicore S.A. Business Unit Precious Metals Refining | BELGIUM                  | Conformant |
| Gold     | United Precious Metal Refining, Inc.                | UNITED STATES OF AMERICA | Conformant |
| Gold     | Valcambi S.A.                                       | SWITZERLAND              | Conformant |
| Gold     | Western Australian Mint (T/a The Perth Mint)        | AUSTRALIA                | Conformant |
| Gold     | WIELAND Edelmetalle GmbH                            | GERMANY                  | Conformant |
| Gold     | Yamakin Co., Ltd.                                   | JAPAN                    | Conformant |
| Gold     | Yokohama Metal Co., Ltd.                            | JAPAN                    | Conformant |
| Gold     | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | CHINA                    | Conformant |
| Gold     | Gold Refinery of Zijin Mining Group Co., Ltd.       | CHINA                    | Conformant |
| Tantalum | Asaka Riken Co., Ltd.                               | JAPAN                    | Conformant |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd.           | CHINA                    | Conformant |
| Tantalum | D Block Metals, LLC                                 | UNITED STATES OF AMERICA | Conformant |
| Tantalum | F&X Electro-Materials Ltd.                          | CHINA                    | Conformant |
| Tantalum | FIR Metals & Resource Ltd.                          | CHINA                    | Conformant |
| Tantalum | Global Advanced Metals Aizu                         | JAPAN                    | Conformant |

| Tantalum | Global Advanced Metals Boyertown                  | UNITED STATES OF AMERICA     | Conformant |
|----------|---|------------------------------|------------|
| Tantalum | XIMEI RESOURCES (GUANGDONG) LIMITED               | CHINA                        | Conformant |
| Tantalum | TANIOBIS Co., Ltd.                                | THAILAND                     | Conformant |
| Tantalum | TANIOBIS GmbH                                     | GERMANY                      | Conformant |
| Tantalum | H.C. Starck Hermsdorf GmbH                        | GERMANY                      | Conformant |
| Tantalum | H.C. Starck Inc.                                  | UNITED STATES OF AMERICA     | Conformant |
| Tantalum | TANIOBIS Japan Co., Ltd.                          | JAPAN                        | Conformant |
| Tantalum | TANIOBIS Smelting GmbH & Co. KG                   | GERMANY                      | Conformant |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd. | CHINA                        | Conformant |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd.      | CHINA                        | Conformant |
| Tantalum | Jiangxi Tuohong New Raw Material                  | CHINA                        | Conformant |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd.       | CHINA                        | Conformant |
| Tantalum | Jiujiang Tanbre Co., Ltd.                         | CHINA                        | Conformant |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd.     | CHINA                        | Conformant |
| Tantalum | KEMET de Mexico                                   | MEXICO                       | Conformant |
| Tantalum | LSM Brasil S.A.                                   | BRAZIL                       | Conformant |
| Tantalum | Metallurgical Products India Pvt., Ltd.           | INDIA                        | Conformant |
| Tantalum | Mineracao Taboca S.A.                             | BRAZIL                       | Conformant |
| Tantalum | Mitsui Mining and Smelting Co., Ltd.              | JAPAN                        | Conformant |
| Tantalum | NPM Silmet AS                                     | ESTONIA                      | Conformant |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd.        | CHINA                        | Conformant |
| Tantalum | Meta Materials                                    | NORTH MACEDONIA, REPUBLIC OF | Conformant |
| Tantalum | QuantumClean                                      | UNITED STATES OF AMERICA     | Conformant |
| Tantalum | Resind Industria e Comercio Ltda.                 | BRAZIL                       | Conformant |

| ,        |   |                          |            |
|----------|---|--------------------------|------------|
| Tantalum | Yanling Jincheng Tantalum & Niobium Co., Ltd.     | CHINA                    | Conformant |
| Tantalum | Solikamsk Magnesium Works OAO                     | RUSSIAN FEDERATION       | Conformant |
| Tantalum | Taki Chemical Co., Ltd.                           | JAPAN                    | Conformant |
| Tantalum | Telex Metals                                      | UNITED STATES OF AMERICA | Conformant |
| Tantalum | Ulba Metallurgical Plant JSC                      | KAZAKHSTAN               | Conformant |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd.     | CHINA                    | Conformant |
| Tin      | Alpha   | UNITED STATES OF AMERICA | Conformant |
| Tin      | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | CHINA                    | Conformant |
| Tin      | Chifeng Dajingzi Tin Industry Co., Ltd.           | CHINA                    | Conformant |
| Tin      | China Tin Group Co., Ltd.                         | CHINA                    | Conformant |
| Tin      | CV Ayi Jaya                                       | INDONESIA                | Conformant |
| Tin      | PT Aries Kencana Sejahtera                        | INDONESIA                | Conformant |
| Tin      | PT Rajehan Ariq                                   | INDONESIA                | Conformant |
| Tin      | Dowa  | JAPAN                    | Conformant |
| Tin      | Metallo Spain S.L.U.                              | SPAIN                    | Conformant |
| Tin      | Gejiu Non-Ferrous Metal Processing Co., Ltd.      | CHINA                    | Conformant |
| Tin      | Gejiu Zili Mining And Metallurgy Co., Ltd.        | CHINA                    | Conformant |
| Tin      | Guangdong Hanhe Non-Ferrous Metal Co., Ltd.       | CHINA                    | Conformant |
| Tin      | HuiChang Hill Tin Industry Co., Ltd.              | CHINA                    | Conformant |
| Tin      | Gejiu Kai Meng Industry and Trade LLC             | CHINA                    | Conformant |
| Tin      | Ma'anshan Weitai Tin Co., Ltd.                    | CHINA                    | Conformant |
| Tin      | Magnu's Minerais Metais e Ligas Ltda.             | BRAZIL                   | Conformant |
| Tin      | Melt Metais e Ligas S.A.                          | BRAZIL                   | Conformant |
| Tin      | Metallic Resources, Inc.                          | UNITED STATES OF AMERICA | Conformant |

|          | Mr. 1111 M 11 G                                | VADAN                     |            |
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| Tin      | Mitsubishi Materials Corporation               | JAPAN                     | Conformant |
| Tin      | Jiangxi New Nanshan Technology Ltd.            | CHINA                     | Conformant |
| Tin      | O.M. Manufacturing (Thailand) Co., Ltd.        | THAILAND                  | Conformant |
| Tin      | O.M. Manufacturing Philippines, Inc.           | PHILIPPINES               | Conformant |
| Tin      | PT ATD Makmur Mandiri Jaya                     | INDONESIA                 | Conformant |
| Tin      | PT Babel Inti Perkasa                          | INDONESIA                 | Conformant |
| Tin      | PT Babel Surya Alam Lestari                    | INDONESIA                 | Conformant |
| Tin      | PT Timah Nusantara                             | INDONESIA                 | Conformant |
| Tin      | PT Prima Timah Utama                           | INDONESIA                 | Conformant |
| Tin      | PT Rajawali Rimba Perkasa                      | INDONESIA                 | Conformant |
| Tin      | PT Sariwiguna Binasentosa                      | INDONESIA                 | Conformant |
| Tin      | PT Stanindo Inti Perkasa                       | INDONESIA                 | Conformant |
| Tin      | PT Tinindo Inter Nusa                          | INDONESIA                 | Conformant |
| Tin      | Resind Industria e Comercio Ltda.              | BRAZIL                    | Conformant |
| Tin      | Rui Da Hung                                    | TAIWAN, PROVINCE OF CHINA | Conformant |
| Tin      | Soft Metais Ltda.                              | BRAZIL                    | Conformant |
| Tin      | Thai Nguyen Mining and Metallurgy Co., Ltd.    | VIET NAM                  | Conformant |
| Tin      | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | CHINA                     | Conformant |
| Tin      | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.  | CHINA                     | Conformant |
| Tin      | Yunnan Yunfan Non-ferrous Metals Co., Ltd.     | CHINA                     | Conformant |
| Tin      | Luna Smelter, Ltd.                             | RWANDA                    | Conformant |
| Tin      | PT Mitra Sukses Globalindo                     | INDONESIA                 | Conformant |
| Tungsten | A.L.M.T. Corp.                                 | JAPAN                     | Conformant |
| Tungsten | ACL Metais Eireli                              | BRAZIL                    | Conformant |
| Tungsten | Asia Tungsten Products Vietnam Ltd.            | VIET NAM                  | Conformant |

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| Tungsten | China Molybdenum Tungsten Co., Ltd.                           | CHINA                     | Conformant |
| Tungsten | Fujian Ganmin RareMetal Co., Ltd.                             | CHINA                     | Conformant |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd.                   | CHINA                     | Conformant |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd.                       | CHINA                     | Conformant |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd.                            | CHINA                     | Conformant |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd.                          | CHINA                     | Conformant |
| Tungsten | H.C. Starck Tungsten GmbH                                     | GERMANY                   | Conformant |
| Tungsten | TANIOBIS Smelting GmbH & Co. KG                               | GERMANY                   | Conformant |
| Tungsten | Hunan Chenzhou Mining Co., Ltd.                               | CHINA                     | Conformant |
| Tungsten | Japan New Metals Co., Ltd.                                    | JAPAN                     | Conformant |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | CHINA                     | Conformant |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd.                  | CHINA                     | Conformant |
| Tungsten | Kennametal Fallon   | UNITED STATES OF AMERICA  | Conformant |
| Tungsten | KGETS Co., Ltd.   | KOREA, REPUBLIC OF        | Conformant |
| Tungsten | Lianyou Metals Co., Ltd.                                      | TAIWAN, PROVINCE OF CHINA | Conformant |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd.                               | CHINA                     | Conformant |
| Tungsten | Moliren Ltd.  | RUSSIAN FEDERATION        | Conformant |
| Tungsten | Niagara Refining LLC  | UNITED STATES OF AMERICA  | Conformant |
| Tungsten | Masan High-Tech Materials                                     | VIET NAM                  | Conformant |
| Tungsten | Philippine Chuangxin Industrial Co., Inc.                     | PHILIPPINES               | Conformant |
| Tungsten | Unecha Refractory metals plant                                | RUSSIAN FEDERATION        | Conformant |
| Tungsten | Wolfram Bergbau und Hutten AG                                 | AUSTRIA                   | Conformant |
| Tungsten | Woltech Korea Co., Ltd.                                       | KOREA, REPUBLIC OF        | Conformant |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.   | CHINA                     | Conformant |