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

# FORM SD

# SPECIALIZED DISCLOSURE REPORT

# Vishay Intertechnology, Inc.

(Exact name of registrant as specified in its charter)			
	Delaware	1-7416	38-1686453
(State o	or Other Jurisdiction of Incorporation)	(Commission File Number)	(I.R.S. Employer Identification Number)
	63 Lancaster Avenue	2	
	Malvern, PA 19355-2143		19355-2143
	(Address of Principal Executive Offices)		Zip Code
Lori Lipcaman, Executive Vice President and Chief Financial Officer			610-644-1300
	(Name and telephone number, including area code, of the		
	· · ·	ontact in connection with th	
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:			
$\checkmark$	Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2022.		

#### Section 1 – Conflict Minerals Disclosure

#### Item 1.01 – Conflict Minerals Disclosure and Report

Vishay Intertechnology, Inc. ("Vishay," the "Company," "we," "us," or "our") is a leading global manufacturer and supplier of discrete semiconductors and passive components.

Substantially all of our products utilize one or more of the minerals tantalum, tin, tungsten or gold—"conflict minerals" (as defined in Section 1, Item 1.01 (d)(3) of Form SD)—that are necessary to the functionality or production of such products. Based on a "reasonable country of origin inquiry" Vishay knows or has reason to believe that a portion of its necessary conflict minerals originated or may have originated in the Democratic Republic of the Congo or an adjoining country (collectively, the "Covered Countries") and knows or has reason to believe that those necessary conflict minerals may not be from recycled or scrap sources.

Accordingly, Vishay designed its due diligence process regarding the source and chain of custody of such conflict minerals, based upon 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, an internationally recognized due diligence framework.

Vishay continues to work with industry groups, including the Responsible Business Alliance (formerly known as the Electronic Industry Citizenship Coalition), and its supply chain partners to attempt to determine the country of origination of such materials.

In accordance with Rule 13p-1, Vishay has filed this Specialized Disclosure Form (Form SD) and the associated Conflict Minerals Report filed as an exhibit to this Form SD, and both reports are posted to our publicly available website at http://ir.vishay.com/sec-filings. The content of any website referred to in this Form SD is included for general information only and is not incorporated by reference in this Form SD.

#### Item 1.02 – Exhibit

Exhibit 1.01 is hereby incorporated into this item by reference.

Section 2 – Exhibits

Item 2.01 – Exhibits

Exhibit No. Description

<u>1.01</u> <u>Conflict Minerals Report as required by Items 1.01 and 1.02 of this Form.</u>

#### 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.

VISHAY INTERTECHNOLOGY, INC.

By: <u>/s/ Lori Lipcaman</u>

Date: May 23, 2023

Name: Lori Lipcaman

Title: Executive Vice President Chief Financial Officer

#### <u>Conflict Minerals Report</u> For the Year Ended December 31, 2022

This report for the year ended December 31, 2022 is presented to comply with Rule 13p-1 and Form SD (collectively, the "Rule") promulgated under the Securities Exchange Act of 1934, as amended. The Rule was adopted by the Securities and Exchange Commission ("SEC") to implement reporting and disclosure requirements related to conflict minerals as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 ("Dodd-Frank Act"). The Rule imposes certain reporting obligations on SEC registrants whose manufactured products contain conflict minerals which are necessary to the functionality or production of their products. Conflict Minerals are defined as cassiterite, columbite-tantalite, gold, wolframite, and their derivatives, which are limited to tin, tantalum, tungsten, and gold ("3TG"). These requirements apply to registrants whatever the geographic origin of the conflict minerals and whether or not they fund armed conflict.

The report presented herein is not audited.

#### I. <u>Company overview</u>

Vishay Intertechnology, Inc. ("Vishay," the "Company," "we," "us," or "our") is a leading global manufacturer and supplier of discrete semiconductors and passive components. Semiconductors include MOSFETs, diodes, and optoelectronic components. Passive components include resistors, inductors, and capacitors. Discrete semiconductors and passive components are essential elements of virtually every type of electronic circuit. Substantially all of our products contain 3TG. Our products are more fully described in Item 1 of our Annual Report on Form 10-K filed with the SEC on February 22, 2023.

We are a major consumer of the world's annual production of tantalum, a metal used in the manufacturing of tantalum capacitors. There are few suppliers that process tantalum ore into capacitor grade tantalum powder. Although most materials incorporated in our products are available from a number of sources, certain materials are available only from a relatively limited number of suppliers, the source for which may include the Democratic Republic of the Congo ("DRC") or adjoining countries (collectively, the "Covered Countries").

Vishay is a member of the Responsible Business Alliance ("RBA") and Responsible Minerals Initiative ("RMI") and fully supports the position of these organizations in avoiding the use of 3TG which directly or indirectly finance or benefit armed groups in the Covered Countries. As such, our position is in full compliance with the RBA Code of Conduct.

Our reasonable country of origin inquiry ("RCOI") included only our manufactured products and excluded our buy/resale business, in which we do not manufacture or contract to manufacture products, as permitted by the Rule.

Vishay Intertechnology is working toward the elimination of conflict minerals that directly or indirectly finance or benefit armed groups in the Covered Countries from its supply chain. Vishay's ultimate goal is to have a supply chain that consists of material that is DRC Conflict Free.

As part of this policy, Vishay will:

- Exercise due diligence as specified in the Organisation for Economic Co-operation and Development ("OECD") Due Diligence Guidance for Responsible Supply chains of Minerals from Conflict-Affected and High Risk Areas (2<sup>nd</sup> Edition) ("OECD Framework") and related 3T and gold supplements.
- 2. Support and participate in industry groups such as the RBA and collaborations such as Conflict Free Sourcing Initiative that are focusing on industry-wide solutions.
- 3. Commit to transparency by providing necessary reports and information to the SEC and customers.

Vishay expects its first tier suppliers of 3TG ("In-scope Suppliers") to:

- 1. Have conflict mineral policies in place to ensure material is sourced from socially responsible suppliers.
- 2. Exercise due diligence to determine the source of conflict minerals.
- 3. Not procure material from the DRC or adjoining countries that is not "DRC Conflict Free."
- 4. Provide the necessary declarations in order to determine if the conflict minerals in the supply chain are DRC Conflict Free.

In-scope Suppliers who are not in compliance with these requirements will be reviewed in order for us to determine the extent to which Vishay will continue to do business with those Suppliers. Vishay will terminate business with any In-scope Supplier if we determine that the Supplier's sourcing of 3TG directly or indirectly finance armed groups in the Covered Countries.



## II. <u>RCOI Process and results</u>

Vishay's RCOI employed a combination of measures to determine whether the necessary 3TG in Vishay's products originated from the Covered Countries. Vishay's supply chain is complex and there are multiple tiers between the Company and the mine. Vishay relies on its In-scope Suppliers to provide information on the origin of the 3TG contained in components which are included in the Company's products. Vishay's primary means of determining country of origin of necessary 3TG was conducting a supply-chain survey with In-scope Suppliers using the RMI Conflict Minerals Reporting Template and RCOI data from the RMI.

Vishay conducted a survey of potential In-scope Suppliers of 3TG, representing all of its potential In-scope suppliers of 3TG. Vishay obtained survey responses from In-scope Suppliers representing 99.5% of the dollar value of 2022 in-scope procurement activities. The survey responses identified 228 smelters and refiners of 3TG. Based on the survey responses obtained, we have reason to believe that some of our supplies of 3TG may have originated in the Covered Countries, some from outside of the Covered Countries, some from recycled/scrap materials, and some from sources that are currently unknown.

As we do not typically have a direct relationship with 3TG smelters and refiners, we rely on the tools available to members of the RBA and RMI to disclose upstream actors in the supply chain.

There is significant overlap between our RCOI efforts and our due diligence process.

## III. <u>Due Diligence Process</u>

# <u>Design</u>

Our due diligence measures have been designed to conform, in all material respects, with the framework in the OECD Framework and related Supplements for gold, tantalum, tin, and tungsten.

## Performance

- a. Company Management Systems
  - i. Policy

Our Responsible Minerals Sourcing Policy is summarized above under "Company Overview" and is also available on our website at www.vishay.com.

The content of any website referred to in this Conflict Minerals Report is included for general information only and is not incorporated by reference in this Conflict Minerals Report.

ii. Communication with In-scope Suppliers

In-scope Suppliers are one of the key components in the execution of the Vishay's 3TG program. As such, Vishay has specified its expectations of the Supplier through the following sources:

- 1. Vishay's Responsible Minerals Sourcing Policy via the Vishay website and direct communication with the Suppliers.
- 2. Conflict Mineral requirements as part of new or renewed Supplier Agreements.
- 3. Yearly Supplier information requests to gather and/or update sourcing information.
  - iii. Education of Personnel

Vishay has educated key personnel involved in the procurement of materials on the Company's Responsible Minerals Sourcing Policy and Program. Vishay has established a management system for 3TG, which includes a core team comprising vice president-level management and is sponsored by executive vice president-level management. Executive management is briefed about the results of our due diligence efforts and provides feedback and direction to the core Conflict Minerals management team.

If agreed with Supplier, Vishay provides training or meetings to communicate Vishay's expectations under the Company's Responsible Minerals Sourcing Policy and Program and to explain any issues that may arise. From time to time, Vishay may also provide reference material to its In-scope Suppliers in order to help them comply with Vishay and industry requirements.

iv. Tracking mechanisms

Vishay uses a third-party software system to distribute, track, collect, analyze, and assign risk assessment metrics to Supplier responses.



#### v. Whistleblower mechanisms

In the event that a Vishay employee, supplier, or customer has a concern regarding the accuracy of information relative to 3TG, they are directed to contact their supervisor or purchasing or sales contact respectively regarding their concern. If such contact is not possible or practical, the employee, supplier, or customer is instructed to contact Vishay's ethics helpline. The contact information for the ethics helpline is available at http://www.vishay.com/company/ethics.

This policy has been communicated to affected employees and suppliers via email.

b. Identify and assess risks in the supply chain

All 3TG In-scope Suppliers are loaded into the Company Conflict Minerals software. The software sends RMI questionnaires and analyzes the responses according to internally defined red flags. Vishay's purchasing team works with its In-scope Suppliers to address any identified red flags. Unresolved red flags are escalated to the 3TG management team. Such suppliers are designated internally as "Red Flag Suppliers."

The smelters and refiners identified by Vishay's In-scope Suppliers are then consolidated into one smelters and refiners list. The origin and mine information obtained from the Supplier surveys and from external resources, such as the RMI, are used in our reasonable country of origin procedures.

Vishay checks all smelters and refiners against the RMI Standard Smelter List and investigates any smelters or refiners not currently on the list. If it is determined that an identified smelter or refiner that is not on the list is truly a smelter or refiner of 3TG, Vishay contacts RBA to request that such smelter or refiner be added to the RBA Standard Smelter List. Lists of Conflict-Smelter Program compliant smelters and refiners are available the RMI website Free at at http://www.responsiblemineralsinitiative.org/.

Vishay's smelters and refiners list is checked against internal criteria to identify if the smelter or refiner could potentially be sourcing from the Covered Countries and be benefiting armed conflict.

Smelters and refiners identified on our consolidated list that do not meet the internal criteria are considered to present a risk of possibly not being DRC Conflict Free and are subject to Vishay's risk mitigation procedures.

As an active member of the RBA and RMI, Vishay communicates to its In-scope Suppliers the requirement that at-risk smelters and refiners be independently certified.

c. Design and implement strategy to respond to identified risks

Red Flag Suppliers, smelters and refiners not on the RMI Standard Smelter list, smelters and refiners with unknown country sourcing, and other smelters and refiners that are considered to present risk (collectively, "Identified Risk Entities") are all subject to Vishay's risk mitigation procedures. Vishay tailors its risk mitigation procedures for each Identified Risk Entity based on the individual Identified Risk Entity's facts and circumstances. The risk mitigation procedures for Identified Risk Entities generally include the following procedures:

- 1. Establish a defined time period that the Identified Risk Entity will work with Vishay's purchasing department to mitigate its identified risks.
- 2. Work with RMI to obtain additional information or certifications.
- 3. Conduct formal reviews of Identified Risk Entities that do not mitigate their identified risks by the established deadline date. The 3TG management team will then implement one or more of the following actions for Identified Risk Entities that cannot be verified to not directly or indirectly benefit armed rebels through their 3TG sourcing:
  - a. Grant additional time to mitigate the identified risk;
  - b. Develop a long-term improvement plan with the supplier;
  - c. Suspend purchasing activities from the In-scope Supplier that has red flags and/or sources from the Identified Risk Entity;
  - d. Establish a phase-out plan for the In-scope supplier that has red flags and/or sources from the Identified Risk Entity.
- 4. If it is determined that the Identified Risk Entity has or likely has directly or indirectly benefited armed rebels through their 3TG sourcing, the 3TG management team will then implement one or more of the following actions:
  - a. Require that the affected In-scope Supplier remove the smelter or refiner that is an Identified Risk Entity from Vishay's supply chain; or
  - b. Terminate purchasing activities with the In-scope Supplier if the Supplier does not remove the smelter or refiner that is an Identified Risk Entity from its supply chain.

The 3TG management team maintains records of its actions as well as tracks several metrics used to monitor the effectiveness of its risk management procedures. The status and results of the risk management procedures are reviewed with senior management semi-annually. Vishay updates its supplier determinations and risk management procedures annually.

d. Audits of smelters' and refiners' due diligence processes

Vishay will rely on third party audit results from the RBA, RMI, London Bullion Market Association, Responsible Jewelry Council, and the Tungsten Industry – Conflict Minerals Council to satisfy the verification of due diligence according to the OECD guidelines and third party audit requirements for high risk smelters and refiners to certify which smelters or refiners are DRC Conflict Free.

#### Inherent Limitations on Due Diligence Measures

As a downstream purchaser of conflict minerals, Vishay's due diligence measures can provide only reasonable, not absolute, assurance regarding the source and chain of custody of the necessary conflict minerals. Vishay's due diligence processes are based on the necessity of seeking data from our direct suppliers and those suppliers seeking similar information within their supply chains to identify the original sources of the necessary conflict minerals. Vishay also relies, to a large extent, on information collected and provided by independent third party audit programs. Such sources of information may yield inaccurate or incomplete information and may be subject to fraud.

Another complicating factor is the unavailability of country of origin and chain of custody information from suppliers on a continuous, real-time basis. Under the Dodd-Frank Act and the Rule, a product is DRC Conflict Free if it meets the required standard every day of the reporting year; conversely, a product would "not be found to be DRC Conflict Free" if it does not meet the required standard even one day of the reporting year. The supply chain of commodities such as conflict minerals is a multi-step process operating more or less on a daily basis, with ore being delivered to smelters and refiners, with smelters and refiners smelting or refining ores into metal containing derivatives such as ingots, with the derivatives being shipped, sold and stored in numerous market locations around the world and with distributors and purchasers holding varying amounts of the derivatives in inventory for use. Since Vishay does not have direct contractual relationships with most smelters and refiners, it relies on its direct suppliers to gather and provide specific information about the date when the ore is smelted into a derivative and later shipped, stored, sold and first entered the stream of commerce. Vishay directly seeks sourcing data on a periodic basis from its direct suppliers as well as certain smelters and refiners. Vishay requests that the data cover the entire reporting year.

#### IV. <u>Reporting</u>

a. Future Steps to be taken

Vishay continues to work with industry groups, including the RBA and RMI, and its In-scope Supply chain partners to enable it to assess the origination and chain of custody of materials in its supply chain.

We expect to take the following steps to improve the due diligence conducted to further mitigate the risk that necessary 3TG in our products could possibly benefit armed groups in the Covered Countries:

- 1. Work to increase the response rate of suppliers to our due diligence inquiries.
- 2. Request In-scope Suppliers to require at risk smelters or refiners to obtain a Conflict Free designation from an industry program such as the RMI.
- 3. Continue to validate In-scope Supplier responses using information collected from independent conflict free smelter validation programs such as the RMI, to which we provide financial support.
  - b. Exclusion of acquired entities

In accordance with the Rule, entities acquired during the reporting period are excluded from the scope of this Conflict Minerals Report. This includes the business of MaxPower Semiconductor, Inc., ("MaxPower"), a California-based fabless power semiconductor provider, acquired in 2022. A substantial number of MaxPower's products utilize one or more 3TG necessary to the functionality or production of such products. MaxPower's products are first required to be included in Vishay's Conflict Minerals reporting for the year ending December 31, 2024.

c. Results

The initial and subsequent responses from Vishay's In-scope Suppliers in our reasonable country of origin procedures did not contain sufficient information to determine the country of origin of all of the 3TG necessary for functionality of all of the products that Vishay manufactured in 2021. We have increased the number and percentage of validated "conflict free" smelters and refiners from 53, or 49%, in 2013 to 217, or 95%, in 2022. We have validated over 94% of smelters and refiners as "conflict free" each year since 2017.

As of May 11, 2023 our smelters and refiners identified by our suppliers are listed below:

Metal	Smelter Reference List	Smelter ID	<b>RMI Status</b>
<u>Validated</u> Gold	as "Conflict Free" Abington Reldan Metals, LLC	CID002708	Compliant
Gold	Advanced Chemical Company	CID002700 CID000015	Compliant
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Gold	Agosi AG	CID000035	Compliant
Gold	Aida Chemical Industries Co., Ltd.	CID000019	Compliant
Gold	Al Etihad Gold Refinery DMCC	CID002560	Compliant
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	CID000041	Compliant
Gold	AngloGold Ashanti Corrego do Sitio Mineracao	CID000058	Compliant
Gold	Argor-Heraeus S.A.	CID000077	Compliant
Gold	Asahi Pretec Corp.	CID000082	Compliant
Gold	Asahi Refining Canada Ltd.	CID000924	Compliant
Gold	Asahi Refining USA Inc.	CID000920	Compliant
Gold	Asaka Riken Co., Ltd.	CID000090	Compliant
Gold	Aurubis AG	CID000113	Compliant
Gold	Bangalore Refinery	CID002863	Compliant
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	CID000128	Compliant
Gold	Boliden AB	CID000157	Compliant
Gold	C. Hafner GmbH + Co. KG	CID000176	Compliant
Gold	CCR Refinery - Glencore Canada Corporation	CID000185	Compliant
Gold	Chimet S.p.A.	CID000233	Compliant
Gold	Chugai Mining	CID000255	Compliant
Gold	Dowa	CID000204 CID000401	Compliant
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Gold	DSC (Do Sung Corporation)	CID000359	Compliant
Gold	Eco-System Recycling Co., Ltd. East Plant	CID000425	Compliant
Gold	Eco-System Recycling Co., Ltd. North Plant	CID003424	Compliant
Gold	Eco-System Recycling Co., Ltd. West Plant	CID003425	Compliant
Gold	Emirates Gold DMCC	CID002561	Compliant
Gold	Geib Refining Corporation	CID002459	Compliant
Gold	Gold by Gold Colombia	CID003641	Compliant
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CID002243	Compliant
Gold	Heimerle + Meule GmbH	CID000694	Compliant
Gold	Heraeus Germany GmbH Co. KG	CID000711	Compliant
Gold	Heraeus Metals Hong Kong Ltd.	CID000707	Compliant
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CID000801	Compliant
Gold	Ishifuku Metal Industry Co., Ltd.	CID000807	Compliant
Gold	Istanbul Gold Refinery	CID000814	Compliant
Gold	Italpreziosi	CID002765	Compliant
Gold	Japan Mint	CID000823	Compliant
Gold	Jiangxi Copper Co., Ltd.	CID000855	Compliant
Gold	JX Nippon Mining & Metals Co., Ltd.	CID000937	Compliant
Gold	Kazzinc	CID000957	Compliant
			<u>.</u>
Gold	Kennecott Utah Copper LLC	CID000969	Compliant
Gold	KGHM Polska Miedz Spolka Akcyjna	CID002511	Compliant
Gold	Kojima Chemicals Co., Ltd.	CID000981	Compliant
fold	Korea Zinc Co., Ltd.	CID002605	Compliant
Gold	L'Orfebre S.A.	CID002762	Compliant
Gold	LS-NIKKO Copper Inc.	CID001078	Compliant
Gold	LT Metal Ltd.	CID000689	Compliant
Gold	Materion	CID001113	Compliant
Gold	Matsuda Sangyo Co., Ltd.	CID001119	Compliant
Gold	Metal Concentrators SA (Pty) Ltd.	CID003575	Compliant

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Gold	Metalor Technologies (Hong Kong) Ltd.	CID001149Compliant
Gold	Metalor Technologies (Singapore) Pte., Ltd.	CID001152Compliant
Gold	Metalor Technologies (Suzhou) Ltd.	CID001147Compliant
Gold	Metalor Technologies S.A.	CID001153Compliant
Gold	Metalor USA Refining Corporation	CID001157Compliant
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	CID001161Compliant
Gold	Mitsubishi Materials Corporation	CID001188Compliant
Gold	Mitsui Mining and Smelting Co., Ltd.	CID001193Compliant
Gold	MKS PAMP SA	CID001352Compliant
Gold	MMTC-PAMP India Pvt., Ltd.	CID002509Compliant
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	CID001220Compliant
Gold	Navoi Mining and Metallurgical Combinat	CID001236Compliant
Gold	NH Recytech Company	CID003189Compliant
Gold	Nihon Material Co., Ltd.	CID001259Compliant
Gold	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	CID002779Compliant
Gold	Ohura Precious Metal Industry Co., Ltd.	CID001325Compliant
Gold	Planta Recuperadora de Metales SpA	CID002919Compliant
Gold	PT Aneka Tambang (Persero) Tbk	CID001397Compliant
Gold	PX Precinox S.A.	CID001498Compliant
Gold	Rand Refinery (Pty) Ltd.	CID001512Compliant
Gold	REMONDIS PMR B.V.	CID002582Compliant
Gold	Royal Canadian Mint	CID001534Compliant
Gold	SAAMP	CID002761Compliant
Gold	SAFINA A.S.	CID002290Compliant
Gold	SEMPSA Joyeria Plateria S.A.	CID001585Compliant
Gold	Shandong Gold Smelting Co., Ltd.	CID001916Compliant
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CID001622Compliant
Gold	Sichuan Tianze Precious Metals Co., Ltd.	CID001736Compliant
Gold	Solar Applied Materials Technology Corp.	CID001761Compliant
Gold	Sumitomo Metal Mining Co., Ltd.	CID001798Compliant
Gold	SungEel HiMetal Co., Ltd.	CID002918Compliant
Gold	T.C.A S.p.A	CID002580Compliant
Gold	Tanaka Kikinzoku Kogyo K.K.	CID001875Compliant
Gold	Tokuriki Honten Co., Ltd.	CID001938Compliant
Gold	TOO Tau-Ken-Altyn	CID002615Compliant
Gold	Torecom	CID001955Compliant
Gold	Umicore S.A. Business Unit Precious Metals Refining	CID001980Compliant
Gold	United Precious Metal Refining, Inc.	CID001993Compliant
Gold	Valcambi S.A.	CID002003Compliant
Gold	Western Australian Mint (T/a The Perth Mint)	CID002030Compliant
Gold	WIELAND Edelmetalle GmbH	CID002778Compliant
Gold	Yamakin Co., Ltd.	CID002100Compliant
Gold	Yokohama Metal Co., Ltd.	CID002129Compliant
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CID002224Compliant
Tantalum	AMG Brasil	CID001076Compliant
Tantalum	D Block Metals, LLC	CID002504Compliant
Tantalum	F&X Electro-Materials Ltd.	CID000460Compliant
Tantalum	FIR Metals & Resource Ltd.	CID002505Compliant
Tantalum	Global Advanced Metals Aizu	CID002558Compliant
Tantalum	Global Advanced Metals Alzu	CID002557Compliant
runuluiii	Siobul Mavunced means Doyenown	GID002007 Compilant

Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CID002492Compliant
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CID002512Compliant
Tantalum	Jiangxi Tuohong New Raw Material	CID002842Compliant
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CID000914Compliant
Tantalum	Jiujiang Tanbre Co., Ltd.	CID000917Compliant
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CID002506Compliant
Tantalum	KEMET de Mexico	CID002539Compliant
Tantalum	Materion Newton Inc.	CID002548Compliant
Tantalum	Metallurgical Products India Pvt., Ltd.	CID001163Compliant
Tantalum	Mineracao Taboca S.A.	CID001175Compliant
Tantalum	Mitsui Mining and Smelting Co., Ltd.	CID001192Compliant
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CID001277Compliant
Tantalum	NPM Silmet AS	CID001200Compliant
Tantalum	QuantumClean	CID001508Compliant
Tantalum	Resind Industria e Comercio Ltda.	CID002707Compliant
Tantalum	RFH Yancheng Jinye New Material Technology Co., Ltd.	CID003583Compliant
Tantalum	Taki Chemical Co., Ltd.	CID001869Compliant
Tantalum	TANIOBIS Co., Ltd.	CID002544Compliant
Tantalum	TANIOBIS Co., Ed. TANIOBIS GmbH	CID002545Compliant
Tantalum	TANIOBIS Japan Co., Ltd.	CID002549Compliant
Tantalum	TANIOBIS Smelting GmbH & Co. KG	CID002550Compliant
Tantalum	Telex Metals	CID002350Compliant CID001891Compliant
Tantalum	Ulba Metallurgical Plant JSC	CID001091Compliant
Tantalum	XIMEI RESOURCES (GUANGDONG) LIMITED	CID001909Compliant CID000616Compliant
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	CID000010Compliant
Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	CID002500Compliant CID001522Compliant
Tin	Alpha	CID001322Compliant
Tin	Aurubis Beerse	CID000232Compliant
Tin	Aurubis Berango	CID002774Compliant
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CID002774Compliant CID000228Compliant
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CID000220Compliant
Tin	China Tin Group Co., Ltd.	CID003130Compliant
Tin	CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil	CID001070Compliant
1 111	Ltda	CID003400Compliant
Tin	CRM Synergies	CID003524Compliant
Tin	CV Ayi Jaya	CID003524Compliant
Tin	CV Venus Inti Perkasa	CID002455Compliant
Tin	Dowa	CID002435Compliant
Tin	EM Vinto	CID000402Compliant CID000438Compliant
Tin	Estanho de Rondonia S.A.	CID000448Compliant
Tin	Fabrica Auricchio Industria e Comercio Ltda.	CID000440Compliant
Tin	Fenix Metals	CID0000468Compliant
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CID000400Compliant CID000538Compliant
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CID0003116Compliant
Tin	Jiangxi New Nanshan Technology Ltd.	CID003110Compliant CID001231Compliant
Tin	Luna Smelter, Ltd.	CID001231Compliant
Tin		CID003387Compliant CID002468Compliant
Tin	Magnu's Minerais Metais e Ligas Ltda. Malaysia Smelting Corporation (MSC)	CID002468Compliant CID001105Compliant
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Tin Tin	Metallic Resources, Inc. Mineracao Taboca S.A.	CID001142Compliant
Tin	Mineracao Taboca S.A. Minsur	CID001173Compliant CID001182Compliant
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Tin	Mitsubishi Materials Corporation	CID001191Compliant
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	CID001314Compliant
Tin	O.M. Manufacturing Philippines, Inc.	CID002517Compliant
Tin	Operaciones Metalurgicas S.A.	CID001337Compliant
Tin	PT Aries Kencana Sejahtera	CID000309Compliant
Tin	PT Artha Cipta Langgeng	CID001399Compliant
Tin	PT ATD Makmur Mandiri Jaya	CID002503Compliant
Tin	PT Babel Inti Perkasa	CID001402Compliant
Tin	PT Babel Surya Alam Lestari	CID001406Compliant
Tin	PT Bangka Prima Tin	CID002776Compliant
Tin	PT Bangka Serumpun	CID003205Compliant
Tin	PT Bukit Timah	CID001428Compliant
Tin	PT Cipta Persada Mulia	CID002696Compliant
Tin	PT Menara Cipta Mulia	CID002835Compliant
Tin	PT Mitra Stania Prima	CID001453Compliant
Tin	PT Mitra Sukses Globalindo	CID003449Compliant
Tin	PT Prima Timah Utama	CID001458Compliant
Tin	PT Putera Sarana Shakti (PT PSS)	CID003868Compliant
Tin	PT Rajawali Rimba Perkasa	CID003381Compliant
Tin	PT Rajehan Ariq	CID002593Compliant
Tin	PT Refined Bangka Tin	CID001460Compliant
Tin	PT Sariwiguna Binasentosa	CID001463Compliant
Tin	PT Stanindo Inti Perkasa	CID001468Compliant
Tin	PT Sukses Inti Makmur	CID001400Compliant
Tin	PT Timah Tbk Kundur	CID002810Compliant
Tin Tin	PT Timah Tbk Mentok	CID001482Compliant
Tin	PT Tommy Utama	CID001493Compliant
Tin	Resind Industria e Comercio Ltda.	CID002706Compliant
Tin	Rui Da Hung	CID001539Compliant
Tin	Thaisarco	CID001898Compliant
Tin	Tin Smelting Branch of Yunnan Tin Co., Ltd.	CID002180Compliant
Tin	Tin Technology & Refining	CID003325Compliant
Tin	White Solder Metalurgia e Mineracao Ltda.	CID002036Compliant
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CID002158Compliant
Tungsten	A.L.M.T. Corp.	CID000004Compliant
Tungsten	Asia Tungsten Products Vietnam Ltd.	CID002502Compliant
Tungsten	China Molybdenum Tungsten Co., Ltd.	CID002641Compliant
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CID000258Compliant
Tungsten	Cronimet Brasil Ltda	CID003468Compliant
Tungsten	Fujian Xinlu Tungsten Co., Ltd.	CID003609Compliant
Tungsten	Ganzhou Haichuang Tungsten Co., Ltd.	CID002645Compliant
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	CID000875Compliant
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CID002315Compliant
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CID002494Compliant
Tungsten	Global Tungsten & Powders LLC	CID000568Compliant
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CID000218Compliant
Tungsten	H.C. Starck Tungsten GmbH	CID002541Compliant
Tungsten	Hubei Green Tungsten Co., Ltd.	CID003417Compliant
Tungsten	Hunan Chenzhou Mining Co., Ltd.	CID000766Compliant
Tungsten	Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products	CID002513Compliant
rungsten	Branch	Gib002515Compliant

True datas	James New Metals Co. I to	CID00002ECompliant
Tungsten	Japan New Metals Co., Ltd.	CID000825Compliant
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CID002551Compliant
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CID002321Compliant
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CID002318Compliant
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CID002317Compliant
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CID002316Compliant
Tungsten	Kennametal Fallon	CID000966Compliant
Tungsten	Kennametal Huntsville	CID000105Compliant
Tungsten	Lianyou Metals Co., Ltd.	CID003407Compliant
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CID002319Compliant
Tungsten	Masan High-Tech Materials	CID002543Compliant
Tungsten	Niagara Refining LLC	CID002589Compliant
Tungsten	Philippine Chuangxin Industrial Co., Inc.	CID002827Compliant
Tungsten	TANIOBIS Smelting GmbH & Co. KG	CID002542Compliant
Tungsten	Wolfram Bergbau und Hutten AG	CID002044Compliant
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CID002320Compliant
Tungsten	Xiamen Tungsten Co., Ltd.	CID002082Compliant
<u>Not</u>		
<b>Validated</b>		
Tin	PT Belitung Industri Sejahtera	CID001421On CFSP Active
		List(a)
Tin	PT Timah Nusantara	CID001486On CFSP Active
		List(a)
Tin	Super Ligas	CID002756On CFSP Active
		List(a)
Gold	Samduck Precious Metals	CID001555Non-compliant <sup>(b)</sup>
Gold	Umicore Precious Metals Thailand	CID002314Non-compliant <sup>(b)</sup>
Tin	Gejiu Zili Mining And Metallurgy Co., Ltd.	CID000555Non-compliant <sup>(b)</sup>
Tin	PT Tinindo Inter Nusa	CID001490Non-compliant <sup>(b)</sup>
Tungsten	ACL Metais Eireli	CID002833Non-compliant <sup>(b)</sup>
Tungsten	Hunan Jintai New Material Co., Ltd.	CID000769Non-compliant <sup>(b)</sup>
Tin	Gejiu Kai Meng Industry and Trade LLC	CID000942Non-compliant(c)
Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	CID001908Non-compliant(c)
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(a)	Smelters and refiners on the CFSP Active List are currently in the process of beco	ming compliant.
(")	Sinchers and remiers on the Grof recive hist are currently in the process of been	ining compliant.

<sup>(</sup>b) Smelter became non-compliant in 2023, subsequent to the end of the reporting period for this report. Vishay's suppliers are working with these smelters to resolve these issues.

(c) Smelter became non-compliant in 2022. Vishay is working with its suppliers to remove these smelters from the supply chain.

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