# 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 (Commission File (State or Other Jurisdiction of Incorporation) (I.R.S. Employer Identification Number) Number) 63 Lancaster Avenue Malvern, PA 19355-2143 19355-2143 (Address of Principal Executive Offices) Zip Code David L. Tomlinson, Senior Vice President - Chief Accounting Officer 610-644-1300

(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, 2023.

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### 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/financial-information/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

1.01 Conflict Minerals Report 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 undersigned hereunto duly authorized.

VISHAY INTERTECHNOLOGY, INC.

By: /s/ David L. Tomlinson Date: May 28, 2024

Name: David L. Tomlinson
Title: Senior Vice President
Chief Accounting Officer

Vishay Intertechnology, Inc. May 28, 2024

## <u>Conflict Minerals Report</u> For the Year Ended December 31, 2023

This report for the year ended December 31, 2023 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 16, 2024.

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:

- 1. 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. RCOI Process and results

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 99.18% of the dollar value of 2023 in-scope procurement activities. The survey responses identified 218 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.

## <u>Performance</u>

- 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/en/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 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 multistep 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. Reporting

## 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 Centerline Technologies, LLC, ("Centerline"), a Massachusetts-based manufacturer of ceramic components, acquired in 2023. A substantial number of Centerline's products utilize one or more 3TG necessary to the functionality or production of such products. Centerline's products are first required to be included in Vishay's Conflict Minerals reporting for the year ending December 31, 2025.

#### 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 2023. We have increased the number and percentage of validated "conflict free" smelters and refiners from 53, or 49%, in 2013 to 215, or 98.62%, in 2023. We have validated over 94% of smelters and refiners as "conflict free" each year since 2017.

Metal Validated as "O	Smelter Reference List Conflict Free"	Smelter ID	RMI Status
Gold	Korea Zinc Co., Ltd.	CID002605	Compliant
Gold	TOO Tau-Ken-Altyn	CID002615	Compliant
Gold	Abington Reldan Metals, LLC	CID002708	Compliant
Gold	L'Orfebre S.A.	CID002762	Compliant
Gold	Italpreziosi	CID002765	Compliant
Gold	SungEel HiMetal Co., Ltd.	CID002918	Compliant
Gold	Planta Recuperadora de Metales SpA	CID002919	Compliant
Gold	T.C.A S.p.A	CID002580	Compliant
Gold	REMONDIS PMR B.V.	CID002582	Compliant
Gold	WIELAND Edelmetalle GmbH	CID002778	Compliant
Gold	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbI		Compliant
Gold	NH Recytech Company	CID003189	Compliant
Gold	Gold by Gold Colombia	CID003641	Compliant
Gold	Metal Concentrators SA (Pty) Ltd.	CID003575	Compliant
Gold	Eco-System Recycling Co., Ltd. West Plant	CID003425	Compliant
Gold	Eco-System Recycling Co., Ltd. North Plant	CID003424	Compliant
Gold	Aida Chemical Industries Co., Ltd.	CID000019	Compliant
Gold	Agosi AG	CID000015	Compliant
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	CID000033	Compliant
Gold	AngloGold Ashanti Corrego do Sitio Mineracao	CID000058	Compliant
Gold	Argor-Heraeus S.A.	CID000038	Compliant
Gold	Asahi Pretec Corp.	CID000077	Compliant
Gold	Asaka Riken Co., Ltd.	CID000082 CID000090	Compliant
Gold	Asaka Rikeli Co., Ltu.  Aurubis AG	CID000030 CID000113	Compliant
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	CID000113 CID000128	Compliant
Gold	Boliden Ronnskar	CID000128 CID000157	Compliant
Gold	C. Hafner GmbH + Co. KG	CID000137 CID000176	Compliant
Gold	CCR Refinery - Glencore Canada Corporation	CID000176 CID000185	Compliant
Gold	Chimet S.p.A.	CID000183 CID000233	Compliant
Gold	Chimict S.p.A. Chugai Mining	CID000255 CID000264	Compliant
Gold	DSC (Do Sung Corporation)	CID000264 CID000359	
Gold	Dowa  Dowa	CID000339 CID000401	Compliant
Gold		CID000401 CID000425	Compliant Compliant
Gold	Eco-System Recycling Co., Ltd. East Plant	CID000423 CID000694	
	Heimerle + Meule GmbH		Compliant
Gold	Heraeus Metals Hong Kong Ltd.	CID000707 CID000711	Compliant
Gold Gold	Heraeus Germany GmbH Co. KG Inner Mongolia Qiankun Gold and Silver Refinery Share Co.,	CID000711 CID000801	Compliant Compliant
Gold	Ltd. Jehifuku Matal Industry Co., Ltd.	CIDOOOOA	Compliant
Gold	Ishifuku Metal Industry Co., Ltd.	CID000807	Compliant
Gold	Istanbul Gold Refinery	CID000814	Compliant
Gold	Japan Mint	CID000823	Compliant
Gold	Jiangxi Copper Co., Ltd.	CID000855	Compliant
Gold	Asahi Refining USA Inc.	CID000920	Compliant
Gold	Asahi Refining Canada Ltd.	CID000924	Compliant
Gold	JX Nippon Mining & Metals Co., Ltd.	CID000937	Compliant
Gold	Kazzinc	CID000957	Compliant
Gold	Kennecott Utah Copper LLC	CID000969	Compliant
Gold	Kojima Chemicals Co., Ltd.	CID000981	Compliant
Gold	LS MnM Inc.	CID001078	Compliant
Gold	Materion	CID001113	Compliant
Gold	Matsuda Sangyo Co., Ltd.	CID001119	Compliant

Gold	Metalor Technologies (Hong Kong) Ltd.	CID001149	Compliant
Gold	Metalor Technologies (Singapore) Pte., Ltd.	CID001152	Compliant
Gold	Metalor Technologies S.A.	CID001153	Compliant
Gold	Metalor USA Refining Corporation	CID001157	Compliant
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	CID001161	Compliant
Gold	Mitsubishi Materials Corporation	CID001188	Compliant
Gold	Mitsui Mining and Smelting Co., Ltd.	CID001193	Compliant
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	CID001220	Compliant
Gold	Navoi Mining and Metallurgical Combinat	CID001236	Compliant
Gold	Nihon Material Co., Ltd.	CID001259	Compliant
Gold	Ohura Precious Metal Industry Co., Ltd.	CID001325	Compliant
Gold	MKS PAMP SA	CID001352	Compliant
Gold	PT Aneka Tambang (Persero) Tbk	CID001397	Compliant
Gold	PX Precinox S.A.	CID001498	Compliant
Gold	Rand Refinery (Pty) Ltd.	CID001512	Compliant
Gold	Royal Canadian Mint	CID001534	Compliant
Gold	SEMPSA Joyeria Plateria S.A.	CID001585	Compliant
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CID001622	Compliant
Gold	Solar Applied Materials Technology Corp.	CID001761	Compliant
Gold	Sumitomo Metal Mining Co., Ltd.	CID001798	Compliant
Gold	Tanaka Kikinzoku Kogyo K.K.	CID001875	Compliant
Gold	Shandong Gold Smelting Co., Ltd.	CID001916	Compliant
Gold	Tokuriki Honten Co., Ltd.	CID001938	Compliant
Gold	Torecom	CID001955	Compliant
Gold	Umicore S.A. Business Unit Precious Metals Refining	CID001980	Compliant
Gold	United Precious Metal Refining, Inc.	CID001993	Compliant
Gold	Valcambi S.A.	CID002003	Compliant
Gold	Western Australian Mint (T/a The Perth Mint)	CID002030	Compliant
Gold	Yamakin Co., Ltd.	CID002100	Compliant
Gold	Yokohama Metal Co., Ltd.	CID002129	Compliant
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CID002224	Compliant
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CID002243	Compliant
Gold	LT Metal Ltd.	CID000689	Compliant
Gold	Metalor Technologies (Suzhou) Ltd.	CID001147	Compliant
Gold	Sichuan Tianze Precious Metals Co., Ltd.	CID001736	Compliant
Gold	SAFINA A.S.	CID001730 CID002290	Compliant
Gold	MMTC-PAMP India Pvt., Ltd.	CID002509	Compliant
Gold	KGHM Polska Miedz Spolka Akcyjna	CID002511	Compliant
Tantalum	Resind Industria e Comercio Ltda.	CID002707	Compliant
Tantalum	Jiangxi Tuohong New Raw Material	CID002707 CID002842	Compliant
Tantalum	RFH Yancheng Jinye New Material Technology Co., Ltd.	CID002542 CID003583	Compliant
Tantalum	F&X Electro-Materials Ltd.	CID003363 CID000460	Compliant
Tantalum	XIMEI RESOURCES (GUANGDONG) LIMITED	CID000400 CID000616	Compliant
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CID000010 CID002492	Compliant
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CID002492 CID000914	Compliant
Tantalum	Jiujiang Tanbre Co., Ltd.	CID000914 CID000917	Compliant
Tantalum	AMG Brasil	CID000917 CID001076	Compliant
Tantalum	Metallurgical Products India Pvt., Ltd.	CID001076 CID001163	Compliant
Tantalum	Mineracao Taboca S.A.	CID001163 CID001175	Compliant
Tantalum	Mitsui Mining and Smelting Co., Ltd.	CID001173 CID001192	Compliant
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Tantalum	NPM Silmet AS	CID001200	Compliant
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CID001277	Compliant
Tantalum	QuantumClean	CID001508	Compliant
Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	CID001522	Compliant
Tantalum	Taki Chemical Co., Ltd.	CID001869	Compliant
Tantalum	Telex Metals	CID001891	Compliant
Tantalum	Ulba Metallurgical Plant JSC	CID001969	Compliant
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CID002512	Compliant
Tantalum	D Block Metals, LLC	CID002504	Compliant
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CID002506	Compliant
Tantalum	FIR Metals & Resource Ltd.	CID002505	Compliant
Tantalum	KEMET de Mexico	CID002539	Compliant
Tantalum	TANIOBIS Co., Ltd.	CID002544	Compliant
Tantalum	TANIOBIS GmbH	CID002545	Compliant
Tantalum	Materion Newton Inc.	CID002548	Compliant
Tantalum	TANIOBIS Japan Co., Ltd.	CID002549	Compliant
Tantalum	TANIOBIS Smelting GmbH & Co. KG	CID002550	Compliant
Tantalum	Global Advanced Metals Boyertown	CID002557	Compliant
Tantalum	Global Advanced Metals Aizu	CID002558	Compliant
Tin	PT Rajehan Ariq	CID002593	Compliant
Tin	PT Cipta Persada Mulia	CID002696	Compliant
Tin	Resind Industria e Comercio Ltda.	CID002070	Compliant
Tin	Super Ligas	CID002700 CID002756	Compliant
Tin	Aurubis Beerse	CID002730 CID002773	Compliant
Tin	Aurubis Berango	CID002773 CID002774	Compliant
Tin		CID002774 CID002835	
Tin	PT Menara Cipta Mulia		Compliant
Tin	HuiChang Hill Tin Industry Co., Ltd.	CID002844	Compliant
Tin	CV Ayi Jaya	CID002570	Compliant
	PT Bangka Prima Tin	CID002776	Compliant
Tin	PT Sukses Inti Makmur (SIM)	CID002816	Compliant
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CID003190	Compliant
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CID003116	Compliant
Tin	Tin Technology & Refining	CID003325	Compliant
Tin	Luna Smelter, Ltd.	CID003387	Compliant
Tin	Yunnan Yunfan Non-ferrous Metals Co., Ltd.	CID003397	Compliant
Tin	Fabrica Auricchio Industria e Comercio Ltda.	CID003582	Compliant
Tin	PT Rajawali Rimba Perkasa	CID003381	Compliant
Tin	DS Myanmar	CID003831	Compliant
Tin	PT Putera Sarana Shakti (PT PSS)	CID003868	Compliant
Tin	CRM Fundicao De Metais E Comercio De Equipamentos	CID003486	Compliant
	Eletronicos Do Brasil Ltda		
Tin	CRM Synergies	CID003524	Compliant
Tin	PT Mitra Sukses Globalindo	CID003449	Compliant
Tin	Mining Minerals Resources SARL	CID004065	Compliant
Tin	Alpha	CID000292	Compliant
Tin	China Tin Group Co., Ltd.	CID001070	Compliant
Tin	PT Premium Tin Indonesia	CID000313	Compliant
Tin	EM Vinto	CID000438	Compliant
Tin	Estanho de Rondonia S.A.	CID000448	Compliant
Tin	Fenix Metals	CID000468	Compliant
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CID000538	Compliant
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Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CID002318	Compliant
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CID002317	Compliant
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CID002316	Compliant
Tungsten	Kennametal Fallon	CID000966	Compliant
Tungsten	Kennametal Huntsville	CID000105	Compliant
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CID002319	Compliant
Tungsten	Wolfram Bergbau und Hutten AG	CID002044	Compliant
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CID002320	Compliant
Tungsten	Xiamen Tungsten Co., Ltd.	CID002082	Compliant
Tungsten	Asia Tungsten Products Vietnam Ltd.	CID002502	Compliant
Tungsten	Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou	CID002513	Compliant
	Tungsten Products Branch		•
Tungsten	H.C. Starck Tungsten GmbH	CID002541	Compliant
Tungsten	TANIOBIS Smelting GmbH & Co. KG	CID002542	Compliant
Tungsten	Masan High-Tech Materials	CID002543	Compliant
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CID002551	Compliant
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Not Validated			
Gold	Bangalore Refinery	CID002863	On CFSP Active List <sup>(a)</sup>
Gold	Advanced Chemical Company	CID000015	On CFSP Active List <sup>(a)</sup>
Tin	Precious Minerals and Smelting Limited	CID003409	On CFSP Active List <sup>(a)</sup>
(a)	Smelters and refiners on the CFSP Active List are currently in		

(a) Smelters and refiners on the CFSP Active List are currently in the process of becoming compliant.