

# Conflict Minerals Disclosure Report

**Revision Date: January 29, 2024**

**Approved By: Frank Blanco**

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#### **4.10.2.1. Required—Public disclosure regarding conflict minerals in products**

**Corporate criterion:** Manufacturer shall annually publically disclose information on the use of necessary conflict minerals in its products for, at a minimum, the products declared to conform to this standard.

Annual public disclosure(s) shall include the following:

- a) A company sourcing policy or supplier code of conduct that addresses conflict minerals.
- b) Description of how the manufacturer conducted a reasonable country of origin inquiry (RCOI) with its direct suppliers and publication of the list of smelters or refiners reported by those suppliers; and
- c) Description of the due diligence measures the manufacturer has conducted on the source and chain of custody of the conflict minerals in their products which may have originated from the covered countries, or conflict-affected and high-risk regions.

Conformity to items b) and c) can be met by providing a website link to manufacturer's conflict minerals disclosure pursuant to Rule 13p-1 of the U.S. Securities and Exchange Act of 1934.

This criterion shall be declared the same in all countries or regions for which the product is declared to conform to this standard. The approach used to conform to this criterion may vary by country or region.

**Applies to:** All manufacturers with products declared to conform to this standard.

**Verification requirements:**

- a) URL(s) and/or copies of the relevant annual public disclosure(s) that meets the requirements of this criterion, for the duration of time for which the manufacturer has declared to conform to this criterion.

**Additional details:** None.

## **Conflict Minerals Policy Statement**

The Conflict Minerals section of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Act”) that was enacted in 2010 requires certain publicly traded companies to report to the U.S. Securities and Exchange Commission on the presence of certain “Conflict Minerals” in the products they manufacture or contract to manufacture and the due diligence that they have conducted with respect to the supply chain of those minerals. The Act defines “Conflict Minerals” as tantalum, tin, tungsten, and gold and their derivatives. In particular, the Act requires the reporting company to determine the source and chain of custody of Conflict Minerals contained in their products, including conducting a “reasonable country of origin inquiry” to determine whether any Conflict Mineral contained in and necessary to the functionality or production of a covered product originated in the Democratic Republic of Congo or any of the adjoining countries of Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia, i.e., the “Covered Countries”, and, if so, whether such Conflict Minerals financed or benefited any armed groups in those countries.

Howard Technology Solutions (“HTS”) is a division of Howard Industries, Inc., which is a privately held company, and thus does not have reporting obligations under the Act. However, we support the policy behind the Act and are committed to assisting our customers who do have reporting obligations.

The laptop and desktop computers, servers, kiosks and medical carts manufactured by HTS contain one or more of the Conflict Minerals. In particular, one or more of the Conflict Minerals may be found in certain component parts we purchase from vendors and incorporate into our products. HTS does not directly source or process any of the Conflict Minerals which may end up in these products, but we have implemented measures to gather applicable information from our suppliers, including the use of the CFSI Conflict Minerals Reporting Template (CMRT). Our suppliers are required to complete the CMRT and they are expected to implement policies and systems to mitigate the risk that any Conflict Minerals in the products they supply to us may support conflict in the Covered Countries. To-date, HTS has not received any information indicating, nor do we have any reason to believe, that any of the Conflict Minerals contained in any of our products may have originated in any of the Covered Countries. HTS will not knowingly purchase any Conflict Minerals which we have reason to believe may support conflict in the Covered Countries and we will continue to endeavor to source responsibly with respect to Conflict Minerals.

HTS does not condone the use of unfair labor practices or any form of forced, indentured or child labor or human trafficking in the manufacturing or distribution of our products, including in our supply chain. We abide by all applicable laws and we strive to do business only with suppliers who likewise comply with applicable laws and who uphold values aligned with ours, including but not limited to in the areas of labor and human rights, health, safety, the environment, and ethics.

## Reasonable Country of Origin Inquiry (RCOI)

The below letter is an example of what we send to our suppliers requesting information about Conflict Minerals. In addition, many of our direct suppliers are publically traded companies who publish.

January 28, 2024

*Via Email - [fblanco@howard.com](mailto:fblanco@howard.com)  
Via Phone- (601) 399-5026*

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

RE: Conflict Minerals Inquiry

Dear \_\_\_\_\_:

The Conflict Minerals section of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Act) that was enacted in 2010 requires certain publicly traded companies to report to the U.S. Securities and Exchange Commission on the presence of Conflict Minerals in the products they manufacture or contract to manufacture and the due diligence they have conducted with respect to Conflict Minerals. "Conflict Minerals" include tantalum, tin, tungsten, and gold and their derivatives. Many companies subject to the Act have begun collecting necessary information from their suppliers to comply with these reporting and due diligence requirements.

As a privately held company, Howard Technology Solutions, a division of Howard Industries, doesn't have direct reporting obligations under the Act. However, some of our customers may, and, to assist many of them in meeting their reporting obligations, we must provide information to them regarding the supply chain for certain products we sell to them that may contain Conflict Minerals. In particular, the Act requires some of our customers to determine the source and chain of custody of Conflict Minerals contained in their products, including conducting a "reasonable country of origin inquiry" to determine whether any Conflict Mineral contained in and necessary to the functionality or production of a covered product originated in the Democratic Republic of Congo or any of the adjoining countries of Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia, i.e., the "Covered Countries", and, if so, whether such Conflict Minerals financed or benefited any armed groups in those countries. These requirements are intended by the SEC to be due diligence inquiries through the supply chain, which in this case includes Howard Technology Solutions and its suppliers, even if we (or you) are not obligated to report to the SEC regarding Conflict Minerals.

Of course we need your assistance in gathering this information. Accordingly, also attached to our transmittal email is the Electronic Industry Citizenship Coalition® (EICC®) and Global e-Sustainability Initiative (GeSI) Conflict Minerals Reporting Template (CMRT), which is widely accepted and adopted as the standard for use in collecting sourcing information related to Conflict Minerals. We ask that you complete this report and return it to us by as soon as possible. We also encourage and expect you to endeavor to mitigate the risk that any Conflict Minerals contained in the products you supply to us support conflict in the Covered Countries, including implementing policies and/or systems toward that end. Our suppliers' reasonable good faith efforts in this regard, as well as their cooperation in responding to our information request(s) pertaining to Conflict Minerals, may be considered as a factor in our sourcing decisions.

If you have any questions, feel free to call me at the above number.

Sincerely,

Frank Blanco  
Vice-President, Purchasing

## **Conflict Minerals Origin**

Howard Technology Solutions has worked with Howard component partners' chains of custody of conflict minerals for our products which may have originated from the covered countries, or conflict-affected and high-risk regions. One or more of the Conflict Minerals may be found in certain component parts we purchase from vendors and incorporate into our products, including laptop and desktop computers, servers, kiosks and medical carts manufactured by HTS. To-date, HTS has not received any information indicating, nor do we have any reason to believe, that any of the Conflict Minerals contained in any of our products may have originated in any of the Covered Countries.

HTS will not knowingly purchase any Conflict Minerals which we have reason to believe may support conflict in the Covered Countries and we will continue to endeavor to source responsibly with respect to Conflict Minerals. We abide by all applicable laws and we strive to do business only with suppliers who likewise comply with applicable laws. HTS expects its suppliers to implement measures aimed toward ensuring such compliance and ethical practices in its supply chain.

A list of suppliers who have been sent a Conflict Minerals Inquiry letter from us is below:

Asus  
Intel  
Micron/Crucial  
Kingston  
Loop  
EVGA (AVNet)

As of the date of the writing of this report, we have received data from all of the vendors listed above.

## Description of Due Diligence Measures Performed

We identified our suppliers that we use in building our OEM Desktop systems containing materials, parts, components or products containing necessary conflict minerals. (“3TG Direct Suppliers”)

1. We require that those 3TG Direct Suppliers use the Responsible Minerals Initiative and Conflict Minerals Reporting Template to obtain and provide to us information from their supply chains regarding relevant entities and the origin of necessary conflict minerals sourced by these entities.
2. Providing training and education to support 3TG Direct Suppliers in completing the Template and answering any questions concerning the initiative.
3. Obtaining acceptable responses from 3TG Direct Suppliers and reviewing any information on countries of origin or recycled and scrap sourcing available online and from other sources.

If a supplier will not or cannot comply with the smelter disclosure request:

If a supplier does not respond to requests for a CMRT within 3 months, we will work with our distributors to find a contact at the supplier who is able to respond with the required information. If after 6 months from the initial request, these efforts are not successful or if the supplier refuses to provide the information, a compliant supplier will be selected.

If conflict minerals are discovered in the supply chain:

If conflict minerals are discovered in a supplier’s supply chain, Howard will contact the supplier to alert them to the issue and communicate that Howard cannot do business with such suppliers. The supplier will have 6 months to provide evidence that steps have been taken to eliminate the conflict minerals, which must be removed from the supply chain within 12 months of the discovery. If satisfactory steps have not been taken by the supplier, a compliant supplier will be selected.

As part of our due diligence measures:

- We compared the relevant 3TG facilities to the facilities that are listed by RMI as either compliant or in process with RMAP, which assesses facilities’ systems and processes for traceability of ore and demonstration of conflict free sourcing at:

RMI Website <http://www.responsiblemineralsinitiative.org> and

RMAP list <http://www.responsiblemineralsinitiative.org/conformant-smelter-refiner-lists>

## **Due Diligence Update: Howard Technology Solutions**

### **Due Diligence Update: Intel**

#### **Executive Summary:**

This annual due diligence review of Howard Technology Solutions (HTS) leverages Intel's Conflict Minerals Reporting Initiative (CMRI) report. Based on Intel's findings, no further action is required at this time.

#### **Key Findings:**

- **Conflict-Free Sourcing:** Intel reports "no reason to believe" that any of the 227 smelter and refinery facilities within HTS's supply chain directly or indirectly finance armed groups in the Covered Countries (DRC, Rwanda, Central African Republic, South Sudan, Uganda, Burundi).
- **Responsible Sourcing Program:** Previously identified non-compliant facilities have been addressed:
  - All but one facility have achieved conformance or are undergoing the process.
  - The remaining non-compliant facility has been removed entirely from the supply chain.

#### **Conclusion:**

Intel's reported actions demonstrate a commitment to responsible mineral sourcing practices that align with our expectations. Therefore, no further due diligence activities are necessary concerning HTS at this time.

#### **Next Steps:**

We will continue to monitor future CMRI reports and conduct annual reviews of HTS to ensure ongoing compliance with responsible sourcing standards.

## **Due Diligence Update: Micron Technology**

### **Executive Summary:**

This annual due diligence review of Micron Technology leverages their smelter list disclosure. Based on the information provided, no further action is required at this time.

### **Key Findings:**

- **Conflict-Free Sourcing:** While specific smelters linked to the Democratic Republic of Congo (DRC) are not listed, Micron's disclosure confirms the removal of non-compliant smelters.
- **Smelter List Disclosure:** All listed smelters are categorized as either conformant or removed from the supply chain.

### **Conclusion:**

Micron's actions, as outlined in their smelter list disclosure, demonstrate a commitment to responsible sourcing practices that align with our expectations. Therefore, no further due diligence activities are necessary concerning Micron at this time.

### **Next Steps:**

We will continue to monitor future smelter list disclosures and conduct annual reviews of Micron to ensure ongoing compliance with responsible sourcing standards.

## 2022 ASUS Supply Chain Smelter/Refiner List

### 2022華碩電腦供應鏈使用冶煉廠與精煉廠名單：

ASUS is cooperating with Responsible Minerals initiative (RMI) founded by EICC&GeSI to investigate on mineral sources within supply chain. All smelters/refiners identified in this list are aggregated and used in ASUS supply chain.

For more details and the most current status of each smelter, visit the RMI website at

<http://www.responsiblemineralsinitiative.org/> 華碩電腦配合責任礦產倡議進行供應鏈礦產來源調查。所有名單中揭露的冶煉廠與精煉廠均來自於華碩供應鏈使用之冶煉廠與精煉廠。請參考責任礦產倡議網站，獲知最新冶煉廠公告名單。

<http://www.responsiblemineralsinitiative.org/>

To learn more about ASUS Responsible Mineral Sourcing, visit

<https://esg.asus.com/en/responsible-manufacturing/responsible-mineral-sourcing>

| Metal/金屬 | Name/名稱   | Country/國家               | Smelter Identification/<br>冶煉廠識別 |
|----------|---|--------------------------|----------------------------------|
| Gold     | Advanced Chemical Company                                     | UNITED STATES OF AMERICA | CID000015                        |
| Gold     | Aida Chemical Industries Co., Ltd.                            | JAPAN                    | CID000019                        |
| Gold     | Agosi AG  | GERMANY                  | CID000035                        |
| Gold     | Almalyk Mining and Metallurgical Complex (AMMC)               | UZBEKISTAN               | CID000041                        |
| Gold     | AngloGold Ashanti Corrego do Sitio Mineracao                  | BRAZIL                   | CID000058                        |
| Gold     | Argor-Heraeus S.A.  | SWITZERLAND              | CID000077                        |
| Gold     | Asahi Pretec Corp.  | JAPAN                    | CID000082                        |
| Gold     | Asaka Riken Co., Ltd.   | JAPAN                    | CID000090                        |
| Gold     | Aurubis AG  | GERMANY                  | CID000113                        |
| Gold     | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | PHILIPPINES              | CID000128                        |
| Gold     | Boliden AB  | SWEDEN                   | CID000157                        |
| Gold     | C. Hafner GmbH + Co. KG                                       | GERMANY                  | CID000176                        |
| Gold     | CCR Refinery - Glencore Canada Corporation                    | CANADA                   | CID000185                        |
| Gold     | Cendres + Metaux S.A.   | SWITZERLAND              | CID000189                        |

| Metal/金屬 | Name/名稱   | Country/國家               | Smelter Identification/<br>冶煉廠識別 |
|----------|---|--------------------------|----------------------------------|
| Gold     | Chimet S.p.A.   | ITALY                    | CID000233                        |
| Gold     | Chugai Mining   | JAPAN                    | CID000264                        |
| Gold     | DSC (Do Sung Corporation)                                       | REPUBLIC OF KOREA        | CID000359                        |
| Gold     | DODUCO Contacts and Refining GmbH                               | GERMANY                  | CID000362                        |
| Gold     | Dowa  | JAPAN                    | CID000401                        |
| Gold     | Eco-System Recycling Co., Ltd. East Plant                       | JAPAN                    | CID000425                        |
| Gold     | LT Metal Ltd.   | REPUBLIC OF KOREA        | CID000689                        |
| Gold     | Heimerle + Meule GmbH   | GERMANY                  | CID000694                        |
| Gold     | Heraeus Metals Hong Kong Ltd.                                   | CHINA                    | CID000707                        |
| Gold     | Heraeus Germany GmbH Co. KG                                     | GERMANY                  | CID000711                        |
| Gold     | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | CHINA                    | CID000801                        |
| Gold     | Ishifuku Metal Industry Co., Ltd.                               | JAPAN                    | CID000807                        |
| Gold     | Istanbul Gold Refinery  | TURKEY                   | CID000814                        |
| Gold     | Japan Mint  | JAPAN                    | CID000823                        |
| Gold     | Jiangxi Copper Co., Ltd.  | CHINA                    | CID000855                        |
| Gold     | Asahi Refining USA Inc.   | UNITED STATES OF AMERICA | CID000920                        |
| Gold     | Asahi Refining Canada Ltd.                                      | CANADA                   | CID000924                        |
| Gold     | JX Nippon Mining & Metals Co., Ltd.                             | JAPAN                    | CID000937                        |
| Gold     | Kazzinc   | KAZAKHSTAN               | CID000957                        |
| Gold     | Kennecott Utah Copper LLC                                       | UNITED STATES OF AMERICA | CID000969                        |
| Gold     | Kojima Chemicals Co., Ltd.                                      | JAPAN                    | CID000981                        |
| Gold     | LS-NIKKO Copper Inc.  | REPUBLIC OF KOREA        | CID001078                        |
|          |   |                          |                                  |

| Metal/金屬 | Name/名稱   | Country/國家               | Smelter Identification/<br>冶煉廠識別 |
|----------|---|--------------------------|----------------------------------|
| Gold     | Materion  | UNITED STATES OF AMERICA | CID001113                        |
| Gold     | Matsuda Sangyo Co., Ltd.                          | JAPAN                    | CID001119                        |
| Gold     | Metalor Technologies (Suzhou) Ltd.                | CHINA                    | CID001147                        |
| Gold     | Metalor Technologies (Hong Kong) Ltd.             | CHINA                    | CID001149                        |
| Gold     | Metalor Technologies (Singapore) Pte., Ltd.       | SINGAPORE                | CID001152                        |
| Gold     | Metalor Technologies S.A.                         | SWITZERLAND              | CID001153                        |
| Gold     | Metalor USA Refining Corporation<br>8             | UNITED STATES OF AMERICA | CID001157                        |
| Gold     | Metalurgica Met-Mex Penoles S.A. De C.V.          | MEXICO                   | CID001161                        |
| Gold     | Mitsubishi Materials Corporation                  | JAPAN                    | CID001188                        |
| Gold     | Mitsui Mining and Smelting Co., Ltd.              | JAPAN                    | CID001193                        |
| Gold     | Nadir Metal Rafineri San. Ve Tic. A.S.            | TURKEY                   | CID001220                        |
| Gold     | Navoi Mining and Metallurgical Combinat           | UZBEKISTAN               | CID001236                        |
| Gold     | Nihon Material Co., Ltd.                          | JAPAN                    | CID001259                        |
| Gold     | Ohura Precious Metal Industry Co., Ltd.           | JAPAN                    | CID001325                        |
| Gold     | PAMP S.A.   | SWITZERLAND              | CID001352                        |
| Gold     | PT Aneka Tambang (Persero) Tbk                    | INDONESIA                | CID001397                        |
| Gold     | PX Precinox S.A.                                  | SWITZERLAND              | CID001498                        |
| Gold     | Rand Refinery (Pty) Ltd.                          | SOUTH AFRICA             | CID001512                        |
| Gold     | Royal Canadian Mint                               | CANADA                   | CID001534                        |
| Gold     | Samduck Precious Metals                           | REPUBLIC OF KOREA        | CID001555                        |
| Gold     | SEMPA Joyeria Plateria S.A.                       | SPAIN                    | CID001585                        |
| Gold     | Shandong Zhaojin Gold & Silver Refinery Co., Ltd. | CHINA                    | CID001622                        |
| Gold     | Sichuan Tianze Precious Metals Co., Ltd.          | CHINA                    | CID001736                        |

| Metal/金屬 | Name/名稱   | Country/國家                | Smelter Identification/<br>冶煉廠識別 |
|----------|---|---------------------------|----------------------------------|
| Gold     | Solar Applied Materials Technology Corp.            | TAIWAN, REPUBLIC OF CHINA | CID001761                        |
| Gold     | Sumitomo Metal Mining Co., Ltd.                     | JAPAN                     | CID001798                        |
| Gold     | Tanaka Kikinzoku Kogyo K.K.                         | JAPAN                     | CID001875                        |
| Gold     | Shandong Gold Smelting Co., Ltd.                    | CHINA                     | CID001916                        |
| Gold     | Tokuriki Honten Co., Ltd.                           | JAPAN                     | CID001938                        |
| Gold     | Torecom   | REPUBLIC OF KOREA         | CID001955                        |
| Gold     | Umicore S.A. Business Unit Precious Metals Refining | BELGIUM                   | CID001980                        |
| Gold     | United Precious Metal Refining, Inc.                | UNITED STATES OF AMERICA  | CID001993                        |
| Gold     | Valcambi S.A.                                       | SWITZERLAND               | CID002003                        |
| Gold     | Western Australian Mint (T/a The Perth Mint)        | AUSTRALIA                 | CID002030                        |
| Gold     | Yamakin Co., Ltd.                                   | JAPAN                     | CID002100                        |
| Gold     | Yokohama Metal Co., Ltd.                            | JAPAN                     | CID002129                        |
| Gold     | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | CHINA                     | CID002224                        |
| Gold     | Gold Refinery of Zijin Mining Group Co., Ltd.       | CHINA                     | CID002243                        |
| Gold     | SAFINA A.S.   | CZECHIA                   | CID002290                        |
| Gold     | Umicore Precious Metals Thailand                    | THAILAND                  | CID002314                        |
| Gold     | Geib Refining Corporation                           | UNITED STATES OF AMERICA  | CID002459                        |
| Gold     | MMTC-PAMP India Pvt., Ltd.                          | INDIA                     | CID002509                        |
| Gold     | KGHM Polska Miedz Spolka Akcyjna                    | POLAND                    | CID002511                        |
| Gold     | Singway Technology Co., Ltd.                        | TAIWAN, REPUBLIC OF CHINA | CID002516                        |
| Gold     | Al Etihad Gold Refinery DMCC                        | UNITED ARAB EMIRATES      | CID002560                        |
| Gold     | Emirates Gold DMCC                                  | UNITED ARAB EMIRATES      | CID002561                        |

| Metal/金屬 | Name/名稱  | Country/國家        | Smelter Identification/<br>冶煉廠識別 |
|----------|--|-------------------|----------------------------------|
| Gold     | T.C.A S.p.A  | ITALY             | CID002580                        |
| Gold     | REMONDIS PMR B.V.  | NETHERLANDS       | CID002582                        |
| Gold     | Korea Zinc Co., Ltd.   | REPUBLIC OF KOREA | CID002605                        |
| Gold     | Marsam Metals  | BRAZIL            | CID002606                        |
| Gold     | TOO Tau-Ken-Altyn  | KAZAKHSTAN        | CID002615                        |
| Gold     | SAAMP  | FRANCE            | CID002761                        |
| Gold     | L'Orfebvre S.A.  | ANDORRA           | CID002762                        |
| Gold     | 8853 S.p.A.  | ITALY             | CID002763                        |
| Gold     | Italpreziosi   | ITALY             | CID002765                        |
| Gold     | WIELAND Edelmetalle GmbH                                       | GERMANY           | CID002778                        |
| Gold     | Ogussa Osterreichische Gold- und Silber-Scheideanstalt<br>GmbH | AUSTRIA           | CID002779                        |
| Gold     | GGC Gujrat Gold Centre Pvt. Ltd.                               | INDIA             | CID002852                        |
| Gold     | Bangalore Refinery   | INDIA             | CID002863                        |
| Gold     | SungEel HiMetal Co., Ltd.                                      | REPUBLIC OF KOREA | CID002918                        |
| Gold     | Planta Recuperadora de Metales SpA                             | CHILE             | CID002919                        |
| Gold     | Safimet S.p.A  | ITALY             | CID002973                        |
| Gold     | NH Recytech Company  | REPUBLIC OF KOREA | CID003189                        |
| Gold     | C.I Metales Procesados Industriales SAS                        | COLOMBIA          | CID003421                        |
| Gold     | Eco-System Recycling Co., Ltd. North Plant                     | JAPAN             | CID003424                        |
| Gold     | Eco-System Recycling Co., Ltd. West Plant                      | JAPAN             | CID003425                        |
| Gold     | Metal Concentrators SA (Pty) Ltd.                              | SOUTH AFRICA      | CID003575                        |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd.                      | CHINA             | CID000211                        |
| Tantalum | F&X Electro-Materials Ltd.                                     | CHINA             | CID000460                        |
| Tantalum | XIMEI RESOURCES (GUANGDONG) LIMITED                            | CHINA             | CID000616                        |

| Metal/金屬 | Name/名稱   | Country/國家                  | Smelter Identification/<br>冶煉廠識別 |
|----------|---|-----------------------------|----------------------------------|
| Tantalum | Jiujiang JinXin Nonferrous Metals Co., Ltd.       | CHINA                       | CID000914                        |
| Tantalum | Jiujiang Tanbre Co., Ltd.                         | CHINA                       | CID000917                        |
| Tantalum | AMG Brasil  | BRAZIL                      | CID001076                        |
| Tantalum | Metallurgical Products India Pvt., Ltd.           | INDIA                       | CID001163                        |
| Tantalum | Mineracao Taboca S.A.                             | BRAZIL                      | CID001175                        |
| Tantalum | Mitsui Mining and Smelting Co., Ltd.              | JAPAN                       | CID001192                        |
| Tantalum | NPM Silmet AS                                     | ESTONIA                     | CID001200                        |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd.        | CHINA                       | CID001277                        |
| Tantalum | QuantumClean                                      | UNITED STATES OF<br>AMERICA | CID001508                        |
| Tantalum | Yanling Jincheng Tantalum & Niobium Co., Ltd.     | CHINA                       | CID001522                        |
| Tantalum | Taki Chemical Co., Ltd.                           | JAPAN                       | CID001869                        |
| Tantalum | Telex Metals                                      | UNITED STATES OF<br>AMERICA | CID001891                        |
| Tantalum | Ulba Metallurgical Plant JSC                      | KAZAKHSTAN                  | CID001969                        |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd. | CHINA                       | CID002492                        |
| Tantalum | D Block Metals, LLC                               | UNITED STATES OF<br>AMERICA | CID002504                        |
| Tantalum | FIR Metals & Resource Ltd.                        | CHINA                       | CID002505                        |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd.     | CHINA                       | CID002506                        |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd.     | CHINA                       | CID002508                        |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd.      | CHINA                       | CID002512                        |
| Tantalum | KEMET de Mexico                                   | MEXICO                      | CID002539                        |
| Tantalum | TANIOBIS Co., Ltd.                                | THAILAND                    | CID002544                        |
| Tantalum | TANIOBIS GmbH                                     | GERMANY                     | CID002545                        |
| Tantalum | H.C. Starck Hermsdorf GmbH                        | GERMANY                     | CID002547                        |

| Metal/金屬 | Name/名稱  | Country/國家                          | Smelter Identification/<br>冶煉廠識別 |
|----------|--|-------------------------------------|----------------------------------|
| Tantalum | H.C. Starck Inc.                                     | UNITED STATES OF AMERICA            | CID002548                        |
| Tantalum | TANIOBIS Japan Co., Ltd.                             | JAPAN                               | CID002549                        |
| Tantalum | TANIOBIS Smelting GmbH & Co. KG                      | GERMANY                             | CID002550                        |
| Tantalum | Global Advanced Metals Boyertown                     | UNITED STATES OF AMERICA            | CID002557                        |
| Tantalum | Global Advanced Metals Aizu                          | JAPAN                               | CID002558                        |
| Tantalum | Resind Industria e Comercio Ltda.                    | BRAZIL                              | CID002707                        |
| Tantalum | Jiangxi Tuohong New Raw Material                     | CHINA                               | CID002842                        |
| Tantalum | RFH Yancheng Jinye New Material Technology Co., Ltd. | CHINA                               | CID003583                        |
| Tin      | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.    | CHINA                               | CID000228                        |
| Tin      | Alpha  | UNITED STATES OF AMERICA            | CID000292                        |
| Tin      | PT Aries Kencana Sejahtera                           | INDONESIA                           | CID000309                        |
| Tin      | Dowa   | JAPAN                               | CID000402                        |
| Tin      | EM Vinto   | BOLIVIA<br>(PLURINATIONAL STATE OF) | CID000438                        |
| Tin      | Estanho de Rondonia S.A.                             | BRAZIL                              | CID000448                        |
| Tin      | Fenix Metals   | POLAND                              | CID000468                        |
| Tin      | Gejiu Non-Ferrous Metal Processing Co., Ltd.         | CHINA                               | CID000538                        |
| Tin      | Gejiu Zili Mining And Metallurgy Co., Ltd.           | CHINA                               | CID000555                        |
| Tin      | China Tin Group Co., Ltd.                            | CHINA                               | CID001070                        |
| Tin      | Malaysia Smelting Corporation (MSC)                  | MALAYSIA                            | CID001105                        |
| Tin      | Metallic Resources, Inc.                             | UNITED STATES OF AMERICA            | CID001142                        |
| Tin      | Mineracao Taboca S.A.                                | BRAZIL                              | CID001173                        |

| Metal/金屬 | Name/名稱  | Country/國家                             | Smelter Identification/<br>冶煉廠識別 |
|----------|--|--|----------------------------------|
| Tin      | Minsur   | PERU                                   | CID001182                        |
| Tin      | Mitsubishi Materials Corporation               | JAPAN                                  | CID001191                        |
| Tin      | Jiangxi New Nanshan Technology Ltd.            | CHINA                                  | CID001231                        |
| Tin      | O.M. Manufacturing (Thailand) Co., Ltd.        | THAILAND                               | CID001314                        |
| Tin      | Operaciones Metalurgicas S.A.                  | BOLIVIA<br>(PLURINATIONAL<br>STATE OF) | CID001337                        |
| Tin      | PT Artha Cipta Langgeng                        | INDONESIA                              | CID001399                        |
| Tin      | PT Babel Surya Alam Lestari                    | INDONESIA                              | CID001406                        |
| Tin      | PT Mitra Stania Prima                          | INDONESIA                              | CID001453                        |
| Tin      | PT Prima Timah Utama                           | INDONESIA                              | CID001458                        |
| Tin      | PT Refined Bangka Tin                          | INDONESIA                              | CID001460                        |
| Tin      | PT Stanindo Inti Perkasa                       | INDONESIA                              | CID001468                        |
| Tin      | PT Timah Tbk Kundur                            | INDONESIA                              | CID001477                        |
| Tin      | PT Timah Tbk Mentok                            | INDONESIA                              | CID001482                        |
| Tin      | PT Timah Nusantara                             | INDONESIA                              | CID001486                        |
| Tin      | PT Tinindo Inter Nusa                          | INDONESIA                              | CID001490                        |
| Tin      | Rui Da Hung                                    | TAIWAN, REPUBLIC<br>OF CHINA           | CID001539                        |
| Tin      | Soft Metais Ltda.                              | BRAZIL                                 | CID001758                        |
| Tin      | Thaisarco                                      | THAILAND                               | CID001898                        |
| Tin      | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | CHINA                                  | CID001908                        |
| Tin      | White Solder Metalurgia e Mineracao Ltda.      | BRAZIL                                 | CID002036                        |
| Tin      | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.  | CHINA                                  | CID002158                        |
| Tin      | Tin Smelting Branch of Yunnan Tin Co., Ltd.    | CHINA                                  | CID002180                        |

| Metal/金屬 | Name/名稱                                      | Country/國家                  | Smelter Identification/<br>冶煉廠識別 |
|----------|--|-----------------------------|----------------------------------|
| Tin      | Magnu's Minerais Metais e Ligas Ltda.        | BRAZIL                      | CID002468                        |
| Tin      | PT ATD Makmur Mandiri Jaya                   | INDONESIA                   | CID002503                        |
| Tin      | O.M. Manufacturing Philippines, Inc.         | PHILIPPINES                 | CID002517                        |
| Tin      | Resind Industria e Comercio Ltda.            | BRAZIL                      | CID002706                        |
| Tin      | Super Ligas                                  | BRAZIL                      | CID002756                        |
| Tin      | Metallo Belgium N.V.                         | BELGIUM                     | CID002773                        |
| Tin      | Metallo Spain S.L.U.                         | SPAIN                       | CID002774                        |
| Tin      | Thai Nguyen Mining and Metallurgy Co., Ltd.  | VIET NAM                    | CID002834                        |
| Tin      | PT Menara Cipta Mulia                        | INDONESIA                   | CID002835                        |
| Tin      | HuiChang Hill Tin Industry Co., Ltd.         | CHINA                       | CID002844                        |
| Tin      | Guangdong Hanhe Non-Ferrous Metal Co., Ltd.  | CHINA                       | CID003116                        |
| Tin      | Chifeng Dajingzi Tin Industry Co., Ltd.      | CHINA                       | CID003190                        |
| Tin      | PT Bangka Serumpun                           | INDONESIA                   | CID003205                        |
| Tin      | Tin Technology & Refining                    | UNITED STATES OF<br>AMERICA | CID003325                        |
| Tin      | Ma'anshan Weitai Tin Co., Ltd.               | CHINA                       | CID003379                        |
| Tin      | PT Rajawali Rimba Perkasa                    | INDONESIA                   | CID003381                        |
| Tin      | PT Mitra Sukses Globalindo                   | INDONESIA                   | CID003449                        |
| Tin      | CRM Synergies                                | SPAIN                       | CID003524                        |
| Tin      | Fabrica Auricchio Industria e Comercio Ltda. | BRAZIL                      | CID003582                        |
| Tin      | PT Babel Inti Perkasa                        | INDONESIA                   | CID001402                        |
| Tin      | PT Sariwiguna Binasentosa                    | INDONESIA                   | CID001463                        |
| Tungsten | Kennametal Huntsville                        | UNITED STATES OF<br>AMERICA | CID000105                        |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd.         | CHINA                       | CID000218                        |

| Metal/金屬 | Name/名稱   | Country/國家               | Smelter Identification/<br>冶煉廠識別 |
|----------|---|--------------------------|----------------------------------|
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd.                          | CHINA                    | CID000258                        |
| Tungsten | Global Tungsten & Powders Corp.                               | UNITED STATES OF AMERICA | CID000568                        |
| Tungsten | Hunan Chenzhou Mining Co., Ltd.                               | CHINA                    | CID000766                        |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd.                   | CHINA                    | CID000769                        |
| Tungsten | Japan New Metals Co., Ltd.                                    | JAPAN                    | CID000825                        |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd.                   | CHINA                    | CID000875                        |
| Tungsten | Kennametal Fallon   | UNITED STATES OF AMERICA | CID000966                        |
| Tungsten | Wolfram Bergbau und Hutten AG                                 | AUSTRIA                  | CID002044                        |
| Tungsten | Xiamen Tungsten Co., Ltd.                                     | CHINA                    | CID002082                        |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd.                       | CHINA                    | CID002315                        |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd.                           | CHINA                    | CID002316                        |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd.                  | CHINA                    | CID002317                        |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | CHINA                    | CID002318                        |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd.                               | CHINA                    | CID002319                        |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd.                              | CHINA                    | CID002320                        |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd.                            | CHINA                    | CID002321                        |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd.                            | CHINA                    | CID002494                        |
| Tungsten | Asia Tungsten Products Vietnam Ltd.                           | VIET NAM                 | CID002502                        |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd.                  | CHINA                    | CID002513                        |
| Tungsten | H.C. Starck Tungsten GmbH                                     | GERMANY                  | CID002541                        |
| Tungsten | TANIOBIS Smelting GmbH & Co. KG                               | GERMANY                  | CID002542                        |
| Tungsten | Masan High-Tech Materials                                     | VIET NAM                 | CID002543                        |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd.               | CHINA                    | CID002551                        |

| Metal/金屬 | Name/名稱   | Country/國家                | Smelter Identification/<br>冶煉廠識別 |
|----------|---|---------------------------|----------------------------------|
| Tungsten | Niagara Refining LLC  | UNITED STATES OF AMERICA  | CID002589                        |
| Tungsten | China Molybdenum Tungsten Co., Ltd.                           | CHINA                     | CID002641                        |
| Tungsten | Ganzhou Haichuang Tungsten Co., Ltd.                          | CHINA                     | CID002645                        |
| Tungsten | Philippine Chuangxin Industrial Co., Inc.                     | PHILIPPINES               | CID002827                        |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.   | CHINA                     | CID002830                        |
| Tungsten | ACL Metais Eireli   | BRAZIL                    | CID002833                        |
| Tungsten | KGETS Co., Ltd.   | REPUBLIC OF KOREA         | CID003388                        |
| Tungsten | Fujian Ganmin RareMetal Co., Ltd.                             | CHINA                     | CID003401                        |
| Tungsten | Lianyou Metals Co., Ltd.                                      | TAIWAN, REPUBLIC OF CHINA | CID003407                        |
| Tungsten | Jingmen Dewei GEM Tungsten Resources Recycling Co., Ltd.      | CHINA                     | CID003417                        |
| Tungsten | Albasteel Industria e Comercio de Ligas Para Fundicao Ltd.    | BRAZIL                    | CID003427                        |
| Tungsten | Cronimet Brasil Ltda  | BRAZIL                    | CID003468                        |
| Tungsten | Fujian Xinlu Tungsten   | CHINA                     | CID003609                        |
| Cobalt   | Gem (Jiangsu) Cobalt Industry Co., Ltd.                       | CHINA                     | CID003209                        |
| Cobalt   | Lanzhou Jinchuan Advanced Materials Technology Co., Ltd.      | CHINA                     | CID003210                        |
| Cobalt   | Zhuhai Kelixin Metal Materials Co., Ltd.                      | CHINA                     | CID003211                        |
| Cobalt   | Ganzhou Tengyuan Cobalt New Material Co., Ltd.                | CHINA                     | CID003212                        |
| Cobalt   | Guangxi Yinyi Advanced Material Co., Ltd.                     | CHINA                     | CID003213                        |
| Cobalt   | Tianjin Maolian Science & Technology Co., Ltd.                | CHINA                     | CID003215                        |
| Cobalt   | Nantong Xinwei Nickel Cobalt Technology Development Co., Ltd. | CHINA                     | CID003221                        |
| Cobalt   | Zhejiang Huayou Cobalt Company Limited                        | CHINA                     | CID003225                        |

| Metal/金屬 | Name/名稱   | Country/國家                | Smelter Identification/<br>冶煉廠識別 |
|----------|---|---------------------------|----------------------------------|
| Cobalt   | Umicore Finland Oy  | FINLAND                   | CID003226                        |
| Cobalt   | Umicore Olen  | BELGIUM                   | CID003228                        |
| Cobalt   | Dynatec Madagascar Company                                  | MADAGASCAR                | CID003232                        |
| Cobalt   | Quzhou Huayou Cobalt New Material Co., Ltd.                 | CHINA                     | CID003255                        |
| Cobalt   | Sumitomo Metal Mining                                       | JAPAN                     | CID003278                        |
| Cobalt   | Mine de Bou-Azzer   | MOROCCO                   | CID003279                        |
| Cobalt   | Compagnie de Tifnout Tiranimine                             | MOROCCO                   | CID003280                        |
| Cobalt   | Guangdong Jiana Energy Technology Co., Ltd.                 | CHINA                     | CID003291                        |
| Cobalt   | Jiangsu Xiongfeng Technology Co., Ltd.                      | CHINA                     | CID003293                        |
| Cobalt   | SungEel HiTech Co., Ltd.                                    | REPUBLIC OF KOREA         | CID003338                        |
| Cobalt   | Jiangxi Jiangwu Cobalt industrial Co., Ltd.                 | CHINA                     | CID003377                        |
| Cobalt   | Jingmen GEM Co., Ltd.                                       | CHINA                     | CID003378                        |
| Cobalt   | Ganzhou Highpower Technology Co., Ltd.                      | CHINA                     | CID003384                        |
| Cobalt   | NORILSK NICKEL HARJAVALTA OY                                | FINLAND                   | CID003390                        |
| Cobalt   | New Era Group Zhejiang Zhongneng Cycle Technology Co., Ltd. | CHINA                     | CID003398                        |
| Cobalt   | Hunan Yacheng New Materials Co., Ltd.                       | CHINA                     | CID003404                        |
| Cobalt   | Murrin Murrin Nickel Cobalt Plant                           | AUSTRALIA                 | CID003406                        |
| Cobalt   | Hunan CNGR New Energy Science & Technology Co., Ltd.        | CHINA                     | CID003411                        |
| Cobalt   | Cosmo Chemical, Ltd.  | REPUBLIC OF KOREA         | CID003415                        |
| Cobalt   | Ningbo Hubang New Material Co., Ltd.                        | CHINA                     | CID003465                        |
| Cobalt   | Hunan Shiji Yintian New Material Co., Ltd.                  | CHINA                     | CID003467                        |
| Cobalt   | CoreMax Corporation   | TAIWAN, REPUBLIC OF CHINA | CID003473                        |
| Cobalt   | Chizhou CN New Materials and Technology Co., Ltd.           | CHINA                     | CID003481                        |

| Metal/金屬 | Name/名稱   | Country/國家                   | Smelter Identification/<br>冶煉廠識別 |
|----------|---|------------------------------|----------------------------------|
| Cobalt   | Zhejiang Zhongjin Greatpower Lithium-Battery Industrial Corporation Co., Ltd. | CHINA                        | CID003526                        |
| Cobalt   | Mechema Taiwan Plant 2  | TAIWAN, REPUBLIC<br>OF CHINA | CID003534                        |
| Cobalt   | Harima Refinery, Sumitomo Metal Mining  | JAPAN                        | CID003577                        |
| Cobalt   | Guizhou CNGR Resource Recycling Industry Development Co., Ltd.                | CHINA                        | CID003610                        |



## Responsible Minerals Report

This Responsible Minerals Report for Kingston Technology covers the reporting period from January 1 to December 31, 2023.

### Overview of our Program

Kingston is committed to reporting and disclosing requirements related to responsible minerals. We designed our program in alignment with the Organization for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the “OECD Guidance”). The U.S. Securities and Exchange Commission has recognized the OECD Guidance as an appropriate nationally and internationally recognized due diligence framework for conflict mineral reporting purposes. We contribute to industry efforts to as a member of the Responsible Business Alliance (“RBA”) and Responsible Minerals Initiative (“RMI”). Through RMI, we support the RMI’s efforts to develop standards and tools that benefit all companies working to break the link between minerals trade and conflict. Specifically, Kingston utilize RMI tools and resources for reporting and risk management.

### Product and Supply Chain Description

We are a global storage and memory solutions company primarily offering:

- Memory products for desktops, laptops, servers, printers; and
- Flash memory products for computers, digital cameras and mobile devices.

For a detailed description of our business and products, can be found on the website at <https://www.kingston.com>. All of our products may contain 3TG and Cobalt that are necessary to the functionality or production of such products, therefore, all of our products are in scope for this report. Kingston performs due diligence on relevant suppliers that Kingston buys from directly and that provide materials and/or manufacturing services collectively referred to as “Manufacturing Suppliers.”

### Due Diligence

#### Design of our Program

The Kingston due diligence process aligns with the OECD Guidance and framework for due diligence.

- Step 1: Establish strong company management systems
- Step 2: Identify and assess risks in the supply chain
- Step 3: Design and implement a strategy to respond to identified risks
- Step 4: Carry out independent third-party audit of smelter/refiner's due diligence practices
- Step 5: Publicly report supply chain due diligence

#### Step 1: Establish strong company management systems

- Responsible Minerals Policy. We have established a responsible minerals sourcing policy to take a holistic approach to the responsible sourcing of minerals and to avoid sourcing minerals that are not compliant with industry standards or are known to contribute to environmental or human rights abuses.

Kingston has adopted the RBA Code of Conduct as the Kingston Supplier Code of Conduct (“the Code”) and expects our suppliers to operate in accordance with the Code. The Code requires suppliers to maintain a conflict minerals policy and conduct supply chain due diligence

to ensure compliance to the Code.

- Internal Management Systems. The Kingston responsible minerals team is responsible for the development of due diligence processes and the internal management systems that implement our responsible minerals policy. Our team works closely with the Purchasing team to set the program strategy and assess supply chain risks.
- Control Systems. The Conflict Mineral Reporting Template (“CMRT”) and Extended Minerals Reporting Template (“EMRT”) obtained from our Manufacturing Suppliers allowed us to gather information that was important for our due diligence efforts, including the 3TG and Cobalt contained in the Manufacturing Suppliers’ products and the names of smelters or refiners in the Manufacturing Suppliers’ own supply chain. We would choose CMRT and EMRT because it is an internationally recognized and commonly used tool that facilitates efficient data gathering and aggregation. We also provided our Manufacturing Suppliers with the Code and communicated with them our responsible mineral policy to source only from smelters and refiners conformant to independent third-party audit programs.

### **Step 2: Identify and assess risks in the supply chain**

In accordance with OECD Guidelines, Kingston should aim to identify the mineral smelters/refiners that produce the refined metals used in their supply chain. It is important to understand risk levels associated with mineral sourcing in the supply chain.

We identify Manufacturing Suppliers that may contribute necessary 3TG and Cobalt to our products. Manufacturing Suppliers are requested to complete an annual supply chain survey, using the CMRT. We expect suppliers to report accurately and to conduct due diligence to ensure minerals used in their products to not benefit armed conflict or contribute to social and environmental abuses. We leverage the RMI process and tools to inform our risk assessment. Each facility that meets the RMI definition of a smelter or refiner of a 3TG and Cobalt mineral is assessed according to red flag indicators aligned with in the OECD Guidance. Kingston uses the following factors to determine the risk level of each smelter and refiner:

- Known mineral source country of origin;
- Responsible Minerals Assurance Process (RMAP) audit status;
- Credible evidence of unethical or conflict sourcing

### **Step 3: Design and implement a strategy to respond to identified risks**

Supply chain due diligence is a dynamic process and requires on-going risk monitoring. Our internal tools enable us to review potential or actual risks identified during the due diligence process primarily through the review of CMRTs and EMRTs submitted to Kingston. If or when our expectations are not met and if certain identified risks are not resolved, the business relationship between Kingston and that supplier will be evaluated with relevant purchase department and could result suspending or discontinuing engagement with a supplier. Kingston will take actions to remove smelters and refiners that are not compliant with industry standards or are known to contribute to environmental or human rights abuses. Suppliers are given only the period of time necessary to remove smelters and refiners of concern. If our expectations are not met by the supplier, the situation is reviewed by the Kingston Material Compliance Team and may result in removing the supplier as an approved vendor.

In 2023, 100% of the smelters and refiners reported to be in our supply chain participated in RMAP. We leverage our participation in RMI to encourage responsible parties to implement corrective actions and to take the necessary steps to comply with industry standards.

Table 1: Smelter Participation in Third-Party Audit Programs

This table presents the number of operational smelters and refiner facilities, identified by our surveyed manufacturing suppliers, as of December 31, 2023, participating in third-party audit programs.

| Reporting Year | Non-Conformant | Conformant |
|----------------|----------------|------------|
| 2023           | 0              | 258        |

Table 2: Smelter and Refiner Identification by Region

This table illustrates the count of identified smelters and refiners per region, as of December 31, 2023.

| Region             | Number of smelters and refiners |
|--------------------|---------------------------------|
| Asia (excl. China) | 95                              |
| China              | 72                              |
| Europe             | 36                              |
| North America      | 22                              |
| South America      | 20                              |
| Russia             | 0                               |
| Rest of world      | 13                              |

The majority of the identified smelters are located in China and Asia, and any active or conformant smelters and refiners in Russia have been removed since 2022.

#### Step 4: Carry out independent third-party audit of smelter/refiner's due diligence practices

We are a downstream consumer of 3TG and Cobalt. Generally, we do not purchase raw minerals or ores, and are normally several tiers away from smelters/refiners within our supply chain. Therefore, we do not perform direct audits of those smelters/refiners. We support the development and implementation of RMAP standards through our RMI membership. Through the RMI, we encourage smelters or refiners to participate in RMAP. Any reported smelters or refiners who were not part of the RMAP or equivalent schemes are removed from the supply chain.

#### Step 5: Publicly report supply chain due diligence

The Kingston Conflict Minerals Report is published on our website. Our Conflict Minerals Report for the reporting period from January 1 to December 31, 2023, is available at <https://www.kingston.com/tw/company/sustainability>.

### Steps to Further Mitigate Risk and Improve Due Diligence

Kingston continues to take steps to improve our due diligence process to further mitigate the risk that 3TGs in our products could benefit armed groups in the DRC or adjoining countries. These steps include:

- Engage with suppliers more closely and provide more information and training resources regarding responsible sourcing of 3TGs;
- Encourage suppliers to have due diligence procedures in place for their supply chains to improve the content of the responses from such suppliers;
- Following the OECD Guidance process, increase the emphasis on validated smelter and refiner information from the supply chain through feedback and detailed smelter analysis.

## Appendix : Kingston Smelter and Refiner List

Appendix lists the facilities which, to the extent known, process the necessary minerals in our products based on the responses from the CMRT and EMRT. Some Manufacturing Suppliers completed the CMRT and EMRT at the company level for only those products that they provide to Kingston. Due to this, our list of smelters or refiners may contain more facilities than those that actually processed the 3TG and Cobalt contained in our products. This list only includes smelters and refiners that have been verified by RMI as eligible operating facilities as of December 31, 2023.

| Metal | Smelter Name  | Country                  |
|-------|---|--------------------------|
| Gold  | Jiangxi Copper Co., Ltd.                            | CHINA                    |
| Gold  | Heraeus Metals Hong Kong Ltd.                       | CHINA                    |
| Gold  | Metalor Technologies (Hong Kong) Ltd.               | CHINA                    |
| Gold  | Metalor Technologies (Suzhou) Ltd.                  | CHINA                    |
| Gold  | Tanaka Kikinzoku Kogyo K.K.                         | JAPAN                    |
| Gold  | Western Australian Mint (T/a The Perth Mint)        | AUSTRALIA                |
| Gold  | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | CHINA                    |
| Gold  | Metalor Technologies S.A.                           | SWITZERLAND              |
| Gold  | Asahi Refining Canada Ltd.                          | CANADA                   |
| Gold  | Metalor USA Refining Corporation                    | UNITED STATES OF AMERICA |
| Gold  | Argor-Heraeus S.A.                                  | SWITZERLAND              |
| Gold  | Matsuda Sangyo Co., Ltd.                            | JAPAN                    |
| Gold  | Aida Chemical Industries Co., Ltd.                  | JAPAN                    |
| Gold  | Asahi Pretec Corp.                                  | JAPAN                    |
| Gold  | Asaka Riken Co., Ltd.                               | JAPAN                    |
| Gold  | Ishifuku Metal Industry Co., Ltd.                   | JAPAN                    |
| Gold  | JX Nippon Mining & Metals Co., Ltd.                 | JAPAN                    |
| Gold  | Metalor Technologies (Singapore) Pte., Ltd.         | SINGAPORE                |
| Gold  | Mitsubishi Materials Corporation                    | JAPAN                    |
| Gold  | Mitsui Mining and Smelting Co., Ltd.                | JAPAN                    |
| Gold  | Nihon Material Co., Ltd.                            | JAPAN                    |
| Gold  | Sumitomo Metal Mining Co., Ltd.                     | JAPAN                    |
| Gold  | Tokuriki Honten Co., Ltd.                           | JAPAN                    |
| Gold  | Agosi AG  | GERMANY                  |
| Gold  | AngloGold Ashanti Corrego do Sitio Mineracao        | BRAZIL                   |
| Gold  | Aurubis AG  | GERMANY                  |
| Gold  | Boliden AB  | SWEDEN                   |

|      |   |                           |
|------|---|---------------------------|
| Gold | C. Hafner GmbH + Co. KG   | GERMANY                   |
| Gold | CCR Refinery - Glencore Canada Corporation                      | CANADA                    |
| Gold | Chimet S.p.A.   | ITALY                     |
| Gold | Chugai Mining   | JAPAN                     |
| Gold | Dowa  | JAPAN                     |
| Gold | Eco-System Recycling Co., Ltd. East Plant                       | JAPAN                     |
| Gold | Heimerle + Meule GmbH   | GERMANY                   |
| Gold | Heraeus Germany GmbH Co. KG                                     | GERMANY                   |
| Gold | Istanbul Gold Refinery  | TURKEY                    |
| Gold | Asahi Refining USA Inc.   | UNITED STATES OF AMERICA  |
| Gold | Kennecott Utah Copper LLC                                       | UNITED STATES OF AMERICA  |
| Gold | Kojima Chemicals Co., Ltd.                                      | JAPAN                     |
| Gold | LS-NIKKO Copper Inc.  | KOREA, REPUBLIC OF        |
| Gold | Metalurgica Met-Mex Penoles S.A. De C.V.                        | MEXICO                    |
| Gold | Ohura Precious Metal Industry Co., Ltd.                         | JAPAN                     |
| Gold | MKS PAMP SA   | SWITZERLAND               |
| Gold | Royal Canadian Mint   | CANADA                    |
| Gold | Solar Applied Materials Technology Corp.                        | TAIWAN, PROVINCE OF CHINA |
| Gold | Shandong Gold Smelting Co., Ltd.                                | CHINA                     |
| Gold | Umicore S.A. Business Unit Precious Metals Refining             | BELGIUM                   |
| Gold | United Precious Metal Refining, Inc.                            | UNITED STATES OF AMERICA  |
| Gold | Yokohama Metal Co., Ltd.  | JAPAN                     |
| Gold | WIELAND Edelmetalle GmbH  | GERMANY                   |
| Gold | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH     | AUSTRIA                   |
| Gold | Rand Refinery (Pty) Ltd.  | SOUTH AFRICA              |
| Gold | Sichuan Tianze Precious Metals Co., Ltd.                        | CHINA                     |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | CHINA                     |
| Gold | Almalyk Mining and Metallurgical Complex (AMMC)                 | UZBEKISTAN                |
| Gold | Bangko Sentral ng Pilipinas (Central Bank of the Philippines)   | PHILIPPINES               |
| Gold | DSC (Do Sung Corporation)                                       | KOREA, REPUBLIC OF        |
| Gold | LT Metal Ltd.   | KOREA, REPUBLIC OF        |
| Gold | Japan Mint  | JAPAN                     |

|          |  |                          |
|----------|--|--------------------------|
| Gold     | Kazzinc                                    | KAZAKHSTAN               |
| Gold     | Materion                                   | UNITED STATES OF AMERICA |
| Gold     | Nadir Metal Rafineri San. Ve Tic. A.S.     | TURKEY                   |
| Gold     | Navoi Mining and Metallurgical Combinat    | UZBEKISTAN               |
| Gold     | PT Aneka Tambang (Persero) Tbk             | INDONESIA                |
| Gold     | PX Precinox S.A.                           | SWITZERLAND              |
| Gold     | SEMPSA Joyeria Plateria S.A.               | SPAIN                    |
| Gold     | Torecom                                    | KOREA, REPUBLIC OF       |
| Gold     | Valcambi S.A.                              | SWITZERLAND              |
| Gold     | Yamakin Co., Ltd.                          | JAPAN                    |
| Gold     | SAFINA A.S.                                | CZECHIA                  |
| Gold     | MMTC-PAMP India Pvt., Ltd.                 | INDIA                    |
| Gold     | KGHM Polska Miedz Spolka Akcyjna           | POLAND                   |
| Gold     | T.C.A S.p.A                                | ITALY                    |
| Gold     | REMONDIS PMR B.V.                          | NETHERLANDS              |
| Gold     | Korea Zinc Co., Ltd.                       | KOREA, REPUBLIC OF       |
| Gold     | TOO Tau-Ken-Altyn                          | KAZAKHSTAN               |
| Gold     | L'Orfebre S.A.                             | ANDORRA                  |
| Gold     | Italpreziosi                               | ITALY                    |
| Gold     | SungEel HiMetal Co., Ltd.                  | KOREA, REPUBLIC OF       |
| Gold     | Planta Recuperadora de Metales SpA         | CHILE                    |
| Gold     | NH Recytech Company                        | KOREA, REPUBLIC OF       |
| Gold     | Eco-System Recycling Co., Ltd. North Plant | JAPAN                    |
| Gold     | Eco-System Recycling Co., Ltd. West Plant  | JAPAN                    |
| Gold     | Metal Concentrators SA (Pty) Ltd.          | SOUTH AFRICA             |
| Gold     | Abington Reldan Metals, LLC                | UNITED STATES OF AMERICA |
| Gold     | Gold by Gold Colombia                      | COLOMBIA                 |
| Tungsten | Xiamen Tungsten Co., Ltd.                  | CHINA                    |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd.         | CHINA                    |
| Tungsten | Niagara Refining LLC                       | UNITED STATES OF AMERICA |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd.           | CHINA                    |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd.       | CHINA                    |
| Tungsten | Japan New Metals Co., Ltd.                 | JAPAN                    |

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| Tungsten | A.L.M.T. Corp.   | JAPAN                     |
| Tungsten | Global Tungsten & Powders Corp.  | UNITED STATES OF AMERICA  |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd.  | CHINA                     |
| Tungsten | H.C. Starck Tungsten GmbH  | GERMANY                   |
| Tungsten | Masan High-Tech Materials  | VIET NAM                  |
| Tungsten | Kennametal Huntsville  | UNITED STATES OF AMERICA  |
| Tungsten | Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch | CHINA                     |
| Tungsten | TANIOBIS Smelting GmbH & Co. KG  | GERMANY                   |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd.                                | CHINA                     |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd.                                   | CHINA                     |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd.   | CHINA                     |
| Tungsten | Hunan Chenzhou Mining Co., Ltd.  | CHINA                     |
| Tungsten | Kennametal Fallon  | UNITED STATES OF AMERICA  |
| Tungsten | Wolfram Bergbau und Hutten AG  | AUSTRIA                   |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd.  | CHINA                     |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.                  | CHINA                     |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd.  | CHINA                     |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd.   | CHINA                     |
| Tungsten | Asia Tungsten Products Vietnam Ltd.  | VIET NAM                  |
| Tungsten | China Molybdenum Tungsten Co., Ltd.  | CHINA                     |
| Tungsten | Philippine Chuangxin Industrial Co., Inc.                                      | PHILIPPINES               |
| Tungsten | Lianyou Metals Co., Ltd.   | TAIWAN, PROVINCE OF CHINA |
| Tungsten | Cronimet Brasil Ltda   | BRAZIL                    |
| Tungsten | Hubei Green Tungsten Co., Ltd.   | CHINA                     |
| Tungsten | Fujian Xinlu Tungsten Co., Ltd.  | CHINA                     |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd.                                    | CHINA                     |
| Tantalum | Jiujiang Tanbre Co., Ltd.  | CHINA                     |
| Tantalum | Metallurgical Products India Pvt., Ltd.  | INDIA                     |
| Tantalum | Mitsui Mining and Smelting Co., Ltd.   | JAPAN                     |
| Tantalum | NPM Silmet AS  | ESTONIA                   |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd.                                     | CHINA                     |
| Tantalum | Ulba Metallurgical Plant JSC   | KAZAKHSTAN                |

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|----------|--|--------------------------|
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd.    | CHINA                    |
| Tantalum | D Block Metals, LLC                                  | UNITED STATES OF AMERICA |
| Tantalum | FIR Metals & Resource Ltd.                           | CHINA                    |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd.         | CHINA                    |
| Tantalum | TANIOBIS Co., Ltd.                                   | THAILAND                 |
| Tantalum | TANIOBIS GmbH  | GERMANY                  |
| Tantalum | Materion Newton Inc.                                 | UNITED STATES OF AMERICA |
| Tantalum | TANIOBIS Japan Co., Ltd.                             | JAPAN                    |
| Tantalum | TANIOBIS Smelting GmbH & Co. KG                      | GERMANY                  |
| Tantalum | Global Advanced Metals Boyertown                     | UNITED STATES OF AMERICA |
| Tantalum | Global Advanced Metals Aizu                          | JAPAN                    |
| Tantalum | Jiangxi Tuohong New Raw Material                     | CHINA                    |
| Tantalum | F&X Electro-Materials Ltd.                           | CHINA                    |
| Tantalum | XIMEI RESOURCES (GUANGDONG) LIMITED                  | CHINA                    |
| Tantalum | Yanling Jincheng Tantalum & Niobium Co., Ltd.        | CHINA                    |
| Tantalum | Telex Metals   | UNITED STATES OF AMERICA |
| Tantalum | Taki Chemical Co., Ltd.                              | JAPAN                    |
| Tantalum | AMG Brasil   | BRAZIL                   |
| Tantalum | Mineracao Taboca S.A.                                | BRAZIL                   |
| Tantalum | QuantumClean   | UNITED STATES OF AMERICA |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd.        | CHINA                    |
| Tantalum | KEMET de Mexico                                      | MEXICO                   |
| Tantalum | Resind Industria e Comercio Ltda.                    | BRAZIL                   |
| Tantalum | RFH Yancheng Jinye New Material Technology Co., Ltd. | CHINA                    |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd.            | CHINA                    |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd.        | CHINA                    |
| Tin      | China Tin Group Co., Ltd.                            | CHINA                    |
| Tin      | Gejiu Non-Ferrous Metal Processing Co., Ltd.         | CHINA                    |
| Tin      | Magnu's Minerais Metais e Ligas Ltda.                | BRAZIL                   |
| Tin      | Malaysia Smelting Corporation (MSC)                  | MALAYSIA                 |
| Tin      | Tin Smelting Branch of Yunnan Tin Co., Ltd.          | CHINA                    |
| Tin      | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.        | CHINA                    |
| Tin      | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.    | CHINA                    |

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| Tin | Alpha                                       | UNITED STATES OF AMERICA         |
| Tin | EM Vinto                                    | BOLIVIA (PLURINATIONAL STATE OF) |
| Tin | Fenix Metals                                | POLAND                           |
| Tin | Guangdong Hanhe Non-Ferrous Metal Co., Ltd. | CHINA                            |
| Tin | Jiangxi New Nanshan Technology Ltd.         | CHINA                            |
| Tin | Aurubis Beerse                              | BELGIUM                          |
| Tin | Aurubis Berango                             | SPAIN                            |
| Tin | Mineracao Taboca S.A.                       | BRAZIL                           |
| Tin | Minsur                                      | PERU                             |
| Tin | Operaciones Metalurgicas S.A.               | BOLIVIA (PLURINATIONAL STATE OF) |
| Tin | PT Artha Cipta Langgeng                     | INDONESIA                        |
| Tin | PT ATD Makmur Mandiri Jaya                  | INDONESIA                        |
| Tin | PT Mitra Stania Prima                       | INDONESIA                        |
| Tin | PT Refined Bangka Tin                       | INDONESIA                        |
| Tin | PT Timah Tbk Kundur                         | INDONESIA                        |
| Tin | PT Timah Tbk Mentok                         | INDONESIA                        |
| Tin | Rui Da Hung                                 | TAIWAN, PROVINCE OF CHINA        |
| Tin | Thaisarco                                   | THAILAND                         |
| Tin | Mitsubishi Materials Corporation            | JAPAN                            |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd.     | THAILAND                         |
| Tin | Dowa  | JAPAN                            |
| Tin | Tin Technology & Refining                   | UNITED STATES OF AMERICA         |
| Tin | Metallic Resources, Inc.                    | UNITED STATES OF AMERICA         |
| Tin | O.M. Manufacturing Philippines, Inc.        | PHILIPPINES                      |
| Tin | PT Aries Kencana Sejahtera                  | INDONESIA                        |
| Tin | PT Premium Tin Indonesia                    | INDONESIA                        |
| Tin | Estanho de Rondonia S.A.                    | BRAZIL                           |
| Tin | PT Babel Inti Perkasa                       | INDONESIA                        |
| Tin | PT Babel Surya Alam Lestari                 | INDONESIA                        |
| Tin | PT Bukit Timah                              | INDONESIA                        |
| Tin | PT Prima Timah Utama                        | INDONESIA                        |
| Tin | PT Sariwiguna Binasentosa                   | INDONESIA                        |

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| Tin    | PT Stanindo Inti Perkasa   | INDONESIA |
| Tin    | PT Tommy Utama   | INDONESIA |
| Tin    | White Solder Metalurgia e Mineracao Ltda.                                    | BRAZIL    |
| Tin    | CV Venus Inti Perkasa  | INDONESIA |
| Tin    | CV Ayi Jaya  | INDONESIA |
| Tin    | PT Cipta Persada Mulia   | INDONESIA |
| Tin    | Resind Industria e Comercio Ltda.  | BRAZIL    |
| Tin    | PT Bangka Prima Tin  | INDONESIA |
| Tin    | PT Sukses Inti Makmur  | INDONESIA |
| Tin    | PT Menara Cipta Mulia  | INDONESIA |
| Tin    | Chifeng Dajingzi Tin Industry Co., Ltd.                                      | CHINA     |
| Tin    | PT Bangka Serumpun   | INDONESIA |
| Tin    | PT Rajawali Rimba Perkasa  | INDONESIA |
| Tin    | Luna Smelter, Ltd.   | RWANDA    |
| Tin    | PT Mitra Sukses Globalindo   | INDONESIA |
| Tin    | CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda | BRAZIL    |
| Tin    | CRM Synergies  | SPAIN     |
| Tin    | Fabrica Auricchio Industria e Comercio Ltda.                                 | BRAZIL    |
| Tin    | PT Putera Sarana Shakti (PT PSS)   | INDONESIA |
| Tin    | DS Myanmar   | MYANMAR   |
| Tin    | PT Tinindo Inter Nusa  | INDONESIA |
| Tin    | PT Rajehan Ariq  | INDONESIA |
| Tin    | PT Timah Nusantara   | INDONESIA |
| Tin    | HuiChang Hill Tin Industry Co., Ltd.   | CHINA     |
| Tin    | Super Ligas  | BRAZIL    |
| Cobalt | Umicore Finland Oy   | FINLAND   |
| Cobalt | Lanzhou Jinchuan Advanced Materials Technology Co., Ltd.                     | CHINA     |
| Cobalt | Niihama Nickel Refinery, Sumitomo Metal Mining                               | JAPAN     |
| Cobalt | Quzhou Huayou Cobalt New Material Co., Ltd.                                  | CHINA     |
| Cobalt | Gem (Jiangsu) Cobalt Industry Co., Ltd.                                      | CHINA     |
| Cobalt | Zhejiang Huayou Cobalt Company Limited                                       | CHINA     |
| Cobalt | Umicore Olen   | BELGIUM   |

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|--------|--|--------------------------------------|
| Cobalt | Murrin Murrin Nickel Cobalt Plant  | AUSTRALIA                            |
| Cobalt | Compagnie de Tifnout Tiranimine  | MOROCCO                              |
| Cobalt | Ganzhou Tengyuan Cobalt New Material Co., Ltd.                               | CHINA                                |
| Cobalt | Dynatec Madagascar Company   | MADAGASCAR                           |
| Cobalt | Guangxi Yinyi Advanced Material Co., Ltd.                                    | CHINA                                |
| Cobalt | Mine de Bou-Azzer  | MOROCCO                              |
| Cobalt | Guangdong Jiana Energy Technology Co., Ltd.                                  | CHINA                                |
| Cobalt | Jiangxi Jiangwu Cobalt industrial Co., Ltd.                                  | CHINA                                |
| Cobalt | NORILSK NICKEL HARJAVALTA OY   | FINLAND                              |
| Cobalt | Ganzhou Highpower Technology Co., Ltd.                                       | CHINA                                |
| Cobalt | Tianjin Maolian Science & Technology Co., Ltd.                               | CHINA                                |
| Cobalt | Kamoto Copper Company  | CONGO, DEMOCRATIC<br>REPUBLIC OF THE |
| Cobalt | Chemaf Etoile  | CONGO, DEMOCRATIC<br>REPUBLIC OF THE |
| Cobalt | La Compagnie de Traitement des Rejets de Kingamyambo S.A.<br>(Metalkol S.A.) | CONGO, DEMOCRATIC<br>REPUBLIC OF THE |
| Cobalt | Jiangsu Xiongfeng Technology Co., Ltd.                                       | CHINA                                |
| Cobalt | Hunan CNGR New Energy Science & Technology Co., Ltd.                         | CHINA                                |
| Cobalt | Cosmo Chemical, Ltd.   | KOREA, REPUBLIC OF                   |
| Cobalt | CoreMax Corporation  | TAIWAN, PROVINCE OF CHINA            |
| Cobalt | Glencore Nikkelverk Refinery   | NORWAY                               |
| Cobalt | Zhuhai Kelixin Metal Materials Co., Ltd.                                     | CHINA                                |
| Cobalt | Port Colborne Refinery   | CANADA                               |
| Cobalt | Societe pour le Traitement du Terril de Lubumbashi (STL)                     | CONGO, DEMOCRATIC<br>REPUBLIC OF THE |
| Cobalt | SungEel HiTech Co., Ltd.   | KOREA, REPUBLIC OF                   |
| Cobalt | Jingmen GEM Co., Ltd.  | CHINA                                |
| Cobalt | Zhejiang New Era Zhongneng Technology Co., Ltd.                              | CHINA                                |
| Cobalt | Hunan Yacheng New Materials Co., Ltd.  | CHINA                                |
| Cobalt | Tenke Fungurume Mining SA  | CONGO, DEMOCRATIC<br>REPUBLIC OF THE |
| Cobalt | Ningbo Hubang New Material Co., Ltd.   | CHINA                                |
| Cobalt | Chizhou CN New Materials and Technology Co., Ltd.                            | CHINA                                |
| Cobalt | Zhejiang Greatpower Cobalt Materials Co., Ltd.                               | CHINA                                |

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| Cobalt | Mechema Taiwan Plant 2   | TAIWAN, PROVINCE OF CHINA |
| Cobalt | Harima Refinery, Sumitomo Metal Mining                         | JAPAN                     |
| Cobalt | Guizhou CNGR Resource Recycling Industry Development Co., Ltd. | CHINA                     |
| Cobalt | Anhui Hanrui New Material Co., Ltd.                            | CHINA                     |
| Cobalt | Guangdong Fangyuan Environment Co., Ltd.                       | CHINA                     |
| Cobalt | Fujian Evergreen New Energy Technology Co.                     | CHINA                     |
| Cobalt | Jiangxi Miracle Golden Tiger Cobalt Co. Ltd.                   | CHINA                     |

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

**FORM SD**

**Specialized Disclosure Report**



**MICRON TECHNOLOGY, INC.**

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(Exact name of registrant as specified in its charter)

**Delaware**

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(State or other jurisdiction of  
incorporation)

**1-10658**

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(Commission File Number)

**8000 South Federal Way  
Boise, Idaho 83716-9632**

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(Address of principal executive offices and Zip Code)

**Mark Murphy  
Executive Vice President and Chief Financial Officer  
(208) 368-4000**

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(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:

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2023.

Rule 13q-1 under the Securities Exchange Act (17 CFR 240.13q-1) for the fiscal year ended \_\_\_\_.

## Section 1 - Conflict Minerals Disclosure

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

In accordance with Rule 13p-1 under the Securities Exchange Act of 1934, as amended (the “Rule”), we conducted a reasonable country of origin inquiry (“RCOI”) to assess whether conflict minerals necessary to the functionality or production of products we manufactured or contracted to manufacture in calendar year 2023 originated in the Democratic Republic of the Congo or an adjoining country (collectively, the “Covered Countries”) or were from recycled or scrap sources. The Rule defines conflict minerals as cassiterite, columbite-tantalite, gold, wolframite, and their derivatives (tin, tantalum, and tungsten).

Based on the results of our RCOI, we have reason to believe that certain conflict minerals contained in our 2023 products may have originated in the Covered Countries and may not have been from recycled or scrap sources. We therefore conducted due diligence on the source and chain of custody of these minerals and prepared a Conflict Minerals Report, filed as Exhibit 1.01 hereto.

### *Conflict Minerals Disclosure*

A copy of the Conflict Minerals Report for the calendar year ended December 31, 2023 is available on our website at [micron.com/about/our-commitment/sourcing-responsibly/responsible-minerals-policy](https://micron.com/about/our-commitment/sourcing-responsibly/responsible-minerals-policy). 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.

The Conflict Minerals Report for the calendar year ended December 31, 2023 is filed as Exhibit 1.01 hereto.

## Section 2 - Resource Extraction Issuer Disclosure

### Item 2.01. Resource Extraction Issuer Disclosure and Report

Not applicable.

## Section 3 - Exhibits

### Item 3.01. Exhibits.

The following exhibit is filed as part of this Form SD.

Exhibit 1.01 - [Conflict Minerals Report](#) as required by Items 1.01 and 1.02 of this Form SD.

**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.

**MICRON TECHNOLOGY, INC.**

Date: May 28, 2024

By: /s/ Mark Murphy

Name: Mark Murphy

Title: Executive Vice President and Chief  
Financial Officer

# Micron Technology, Inc.

## Conflict Minerals Report Calendar Year 2023

We<sup>1</sup> prepared this Conflict Minerals Report (“**CMR**”) pursuant to Rule 13p-1 under the Securities Exchange Act of 1934, as amended (the “**Rule**”). This CMR covers the calendar year reporting period ended December 31, 2023<sup>2</sup> and is filed as an exhibit to our Form SD. This CMR includes a description of the measures we have taken to exercise due diligence on the source and chain of custody of conflict minerals<sup>3</sup> (specifically gold, cassiterite, columbite-tantalite and wolframite and their derivatives tin, tantalum, and tungsten (collectively “**3TG**” or “**conflict minerals**”)) necessary to the functionality or production of our memory and storage products manufactured during the year ended December 31, 2023.

## Overview of Our Commitment to Responsible Sourcing:

In support of global responsible sourcing, we are committed to monitoring our supply chain with a goal to ensure that conflict minerals directly or indirectly supporting civil violence or human rights abuses in the Democratic Republic of the Congo (“**DRC**”) or adjoining countries (collectively, the “**Covered Countries**”) are not used in the manufacture of Micron products. We also believe that responsible sourcing means continuing to support stable economic development in the Covered Countries (rather than a Covered Country embargo), and accordingly we do not prohibit our suppliers from using 3TG metals sourced from the Covered Countries. Our conflict mineral supply chain monitoring program is consistent with the Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition) (the “**OECD Guidance**”) and integrates tools developed by the Responsible Minerals Initiative (“**RMI**”).

Micron is a founding member of RMI (member ID MICR). We continue to support RMI and its Responsible Minerals<sup>4</sup> third-party auditing program, the Responsible Minerals Assurance Process (“**RMAP**”), as part of our commitment to drive ethical sourcing of 3TG metals throughout our supply chain. In 2023, we continued working with RMI and provided leadership through multiple RMI leadership working groups, including the Smelter Engagement, Multi-Stakeholder, Gold, Cobalt Task Force, Due Diligence Practices, Minerals Reporting Template, and RMI Plenary Working Groups. The RMI Plenary Working Group is tasked with defining future directions, protocol, procedures, issue resolutions, recognition of other reporting organizations, training, oversight, and smelter and refiner engagements. To learn more about RMI’s initiatives to help companies achieve a responsible minerals supply chain and the RMAP visit [responsiblemineralsinitiative.org](https://responsiblemineralsinitiative.org).

Micron’s Responsible Minerals Policy is published at [micron.com/about/our-commitment/sourcing-responsibly/responsible-minerals-policy](https://micron.com/about/our-commitment/sourcing-responsibly/responsible-minerals-policy). To learn more about our responsible minerals supplier requirements, see our Micron Supplier Requirements Standard (“**SRS**”) at [micron.com/about/our-commitment/sourcing-responsibly/suppliers](https://micron.com/about/our-commitment/sourcing-responsibly/suppliers). The content of any website referred to in this Report is included for general information only and is not incorporated by reference in this Report.

<sup>1</sup> In this CMR, unless otherwise indicated or the context otherwise requires, “we,” “us,” “our,” “Micron,” and the “Company” refers to Micron Technology, Inc. and its subsidiaries.

<sup>2</sup> Unless otherwise noted, any designation of years refers to calendar years.

<sup>3</sup> Conflict minerals are those minerals regulated by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

<sup>4</sup> The term “responsible minerals” as used herein refers to a process to verify that relevant smelters or refiners are Conformant with the RMI’s RMAP or an equivalent third-party auditing program.

# Overview of Micron’s Responsible Minerals Program:

We require our suppliers<sup>5</sup> to source 3TG metals from smelters and refiners validated as Conformant<sup>6</sup> with responsible minerals sourcing standards (such as the RMAP or standards enacted by the London Bullion Market Association (“**LBMA**”) or the Responsible Jewellery Council (“**RJC**”)). To ensure our suppliers meet our SRS requirements for responsible minerals sourcing, we make all suppliers aware of our commitment to responsible sourcing and our expectation that all smelters and refiners in our supply chain are Conformant with responsible minerals sourcing standards; conduct ongoing due diligence on the source and chain of custody of conflict minerals in our supply chain consistent with the OECD Guidance; encourage suppliers to adopt responsible sourcing practices; and collaborate with industry stakeholders through our leadership in the RMI. To further transparency in the conflict mineral supply chain, in addition to publicly reporting the results of our due diligence efforts annually, we share our due diligence results directly with our customers.

In 2023, we requested that all new suppliers take a Supplier Compliance Training, which helped increase awareness of and focus on our requirement that Micron suppliers may only use Conformant smelters and refiners. All of our applicable suppliers for 2023 provided CMRT responses in response to our requests. As a result of our supplier engagement efforts during 2023, and for the seventh consecutive year, based on the information provided by our suppliers, no supplier within our memory and storage products supply chain reported any smelters or refiners that had a Non-Conformant status with RMI as of December 31, 2023. Only one of our smelters and refiners was listed as Active<sup>7</sup> by RMI as of December 31, 2023. As a result of our continued due diligence efforts, the supplier that identified the Active refiner confirmed in 2024 that it would no longer sell us products containing gold processed by that refiner. We also continued to implement our resolution process to quickly identify and work toward removal of smelters and refiners from our supply chain either (a) when they drop out of the RMI, LBMA, or RJC programs and thus become Non-Conformant or (b) when their Conformant status with RMI is no longer valid.

Based on the information provided by our suppliers and our due diligence efforts through December 31, 2023, we identified a total of 211 smelters and refiners we believe were in our memory and storage products supply chain at any point during the year ended December 31, 2023, none of which had a Non-Conformant status with RMI at the time they entered our supply chain. 27 smelters and refiners that were reported to be in our memory and storage products supply chain during 2023 were subsequently determined, on or prior to December 31, 2023, to be inoperative or removed on or prior to December 31, 2023. We determined that 184 smelters and refiners were in our memory and storage products supply chain as of December 31, 2023, of which 183 were validated as Conformant and one was listed as Active with RMI. As described above, as a result of our continued diligence efforts, the Active refiner was removed from our supply chain in 2024.

## 1. Our Outreach to Suppliers and Reasonable Country of Origin Inquiry

Our goal is to ensure that all 3TG metals in our supply chain are sourced through responsible minerals smelters and refiners. In furtherance of that goal, we collect information at least annually utilizing the RMI Conflict Minerals Reporting Template (“**CMRT**”) from applicable suppliers regarding their supply chains, including the names and locations of smelters and refiners of 3TG and whether any 3TG are sourced from Covered Countries or from conflict-affected and high-risk areas. We then ask that suppliers review and acknowledge our Responsible Minerals Policy and our SRS, which sets out our expectations that all smelters and refiners in our supply chain are, and remain, validated as Conformant.

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<sup>5</sup> The term “supplier(s)” refers to both incumbent and new suppliers and manufacturers that are likely to provide us with products containing 3TG metals that are necessary to the function or manufacture of our memory and storage products. The term “supplier(s)” does not include suppliers and manufacturers to the extent that they supply us with equipment or tools used in manufacturing our products.

<sup>6</sup> The term “Conformant” means that a smelter or refiner is verified as Conformant with the RMI’s RMAP or an equivalent third-party auditing program.

<sup>7</sup> The term “Active,” with respect to the RMI, means that a smelter or refiner has committed to undergo an RMAP assessment, completed the relevant documents, and scheduled an on-site assessment.

In addition, we required that new suppliers in our memory and storage products supply chain participate in our Supplier Lifecycle Performance Management process as they were added to our memory and storage products supply chain throughout the year, and we requested that they complete our formal Supplier Compliance Training program.

We make our suppliers aware that smelters and refiners that fail to become Conformant in one or more responsible sourcing auditing programs will be targeted for removal from our memory and storage products supply chain. In addition, the terms and conditions we include with every Micron purchase order further reinforce our responsible sourcing expectations and requirements with direct reference to our SRS. Throughout 2023, we worked with our suppliers to help raise awareness of our expectations, provide ongoing education concerning our requirements, and provide training through our risk mitigation and escalation process.

Our outreach to suppliers, which included our reasonable country of origin inquiry, did not provide us with complete information on the origin of 3TG from smelters and refiners reported to be in our memory and storage products supply chain in 2023. We had reason to believe, however, that at least some sourcing was from the DRC and adjoining countries. Accordingly, we conducted due diligence on the chain and custody of 3TG and prepared this Conflict Minerals Report.

## **2. Our Conflict Minerals Due Diligence Program**

### ***2.1 Our Conflict Minerals Due Diligence Program Design***

We have designed our conflict minerals due diligence program in conformance, in all material respects, with the principles of the OECD Guidance and the supplements thereto as applied to downstream companies. As a downstream purchaser of 3TG metals, our due diligence program can provide only reasonable, not absolute, assurance regarding the source and chain of custody of the 3TG metals necessary to the functionality or production of our products. Our 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 3TG metals contained in our memory and storage products. We also rely, to a large extent, on information collected and provided by RMI and other third-party auditing programs. Such sources of information may yield inaccurate, incomplete, or over-inclusive information and may be subject to fraud.

### ***2.2 Our Conflict Minerals Due Diligence for 2023 Products***

#### ***2.2.1 Our Management Systems***

For the year ended December 31, 2023, management of our responsible minerals program was provided by a cross-functional Responsible Minerals Steering Team, with representatives from Micron's Procurement, Supply Chain, Finance, Sales, Sustainability, and Legal departments, headed by a senior Procurement compliance manager. The Steering Team met at least monthly during the year ended December 31, 2023 to review progress towards maintaining our goal of a responsibly-sourced supply chain. Oversight of the Responsible Minerals Steering Team was provided by a cross-functional Responsible Minerals Executive Team comprised of Vice President-level executives, and the Responsible Minerals Executive Team is charged with sponsoring and reviewing our responsible minerals program. The Steering Team reported to the Executive Team on a periodic basis during the year ended December 31, 2023. In addition, our Global Supply Chain Compliance Council, which includes a subset of our Responsible Minerals Executive Team, is charged with direct oversight of our responsible sourcing program. During the year ended December 31, 2023, the Steering Team reported regularly to the Global Supply Chain Compliance Council to review our progress towards our goal of achieving a responsibly-sourced supply chain.

Micron's Responsible Minerals Policy is published at [micron.com/about/our-commitment/sourcing-responsibly/responsible-minerals-policy](https://micron.com/about/our-commitment/sourcing-responsibly/responsible-minerals-policy).

We also continued to incorporate our responsible minerals supplier requirements (i.e., that suppliers must report 100% of their supply chain and only source from Conformant smelters and refiners) into the terms and conditions of our purchase orders and supplier agreements, and maintained internal and third-party access to our ethics and compliance helpline, which can be used to report issues relating to conflict minerals. Our program included a ten-year record retention policy for our responsible minerals documents.

### 2.2.2 Our Risk Assessment

We conducted due diligence, as described in this CMR, to try to determine the source and chain of custody of the necessary 3TG metals contained in these memory and storage products. Our management assessment process led us to believe that at least some sourcing is from the DRC and adjoining countries. We were unable to determine the country of origin of some of the necessary 3TG metals contained in memory and storage products we manufactured and sold during the year ended December 31, 2023 and/or whether some of the memory and storage products we manufactured and sold during the year ended December 31, 2023 contained 3TG metals that may have directly or indirectly financed or benefited armed groups in the DRC or an adjoining country.

As part of our due diligence process, we collected, screened and analyzed CMRTs from all applicable suppliers for the year ended December 31, 2023. We provided our suppliers with formal notification of Micron's requirements to convey our expectations that they report to us, within fourteen days of any such occurrence, any changes to their supply chains that would affect their CMRT status.

We reviewed all CMRT responses and updates received for the year ended December 31, 2023 and determined whether the disclosed smelters or refiners were recognized by RMI or equivalents as processors of 3TG metals, and if so, whether they had been validated as Conformant by these organizations. We reviewed supplier CMRTs for accuracy and overall adherence to our responsible minerals requirements, as delivered through our inquiry letter to suppliers, and we began our risk mitigation (and escalation processes, if necessary) set out in our responsible minerals procedures with suppliers having disclosed any smelters or refiners that were not Conformant.

Other elements of our risk assessment process are described in "Overview of Micron's Responsible Minerals Program."

### 2.2.3 Our Risk Management

If a supplier delivers a CMRT that includes smelters or refiners not listed as Conformant, we implement our risk mitigation procedures, beginning with direct outreach to the supplier and escalating discussions up the management structure of our respective companies. We work with these suppliers throughout the risk mitigation process to provide awareness of Micron's goal to only source from Conformant smelters or refiners. 27 smelters and refiners that were reported to be in our memory and storage products supply chain during 2023 were subsequently determined, on or prior to December 31, 2023, to be inoperative or removed. As of December 31, 2023, one refiner in our memory and storage products supply chain was listed as Active with RMI. As described above, as a result of our continued diligence efforts, the Active refiner was removed from our supply chain in 2024.

We are members of multiple RMI working groups, including the RMI Smelter Engagement Working Group, which was tasked with identifying and influencing smelters and refiners in the supply chains of RMI members to join the RMAP and become validated as responsibly sourced. Micron also has additional RMI formal representation and leadership positions on multiple RMI working groups, including the Multi-Stakeholder, Due Diligence Practices, Minerals Reporting Template, Gold, Cobalt Task Force, and RMI Plenary Working Groups. Through our membership dues, we provide funding to DRC in-region agencies.

#### 2.2.4 Smelter and Refiner Auditing

As we do not source necessary 3TG metals directly from smelters or refiners, we rely on independent third-party auditing programs, such as the RMAP, LBMA, and RJC to coordinate audits of smelters and refiners in our memory and storage products supply chain.

#### 2.2.5 Reporting

We report our annual conflict minerals due diligence results in our responsible minerals program to the U.S. Securities and Exchange Commission through the Form SD and the CMR. We make the CMR available on our company website.

### **3. Our Product Descriptions**

Our product portfolio of memory and storage solutions, advanced solutions, and storage platforms is based on our high-performance semiconductor memory and storage technologies, including dynamic random access memory (“**DRAM**”), NAND, and NOR (both as described below). We sell our products into various markets through our business units in numerous forms, including components, modules, solid state drives (“**SSDs**”), managed NAND, Multi-Chip Packages, and wafers. Our system-level solutions, including SSDs and managed NAND, combine NAND, a controller, firmware, and in some cases DRAM. During the year ended December 31, 2023, we manufactured or contracted to manufacture the following types of memory and storage products containing 3TG metals.

#### DRAM

DRAM products are dynamic random access memory semiconductor devices with low latency that provide high-speed data retrieval with a variety of performance characteristics. DRAM products lose content when power is turned off (“**volatile**”) and are most commonly used in client, cloud server, enterprise, networking, graphics, industrial, and automotive markets. Low-power DRAM products, which are engineered to meet standards for performance and power consumption, are sold into smartphone and other mobile-device markets (including client markets for Chromebooks and notebook PCs), as well as into the automotive, industrial, and consumer markets.

#### NAND

NAND products are non-volatile, re-writeable semiconductor storage devices that provide high-capacity, low-cost storage with a variety of performance characteristics. NAND is used in SSDs for the enterprise and cloud, client, and consumer markets and in removable storage markets. Managed NAND is used in smartphones and other mobile devices, and in consumer, automotive, and embedded markets. Low-density NAND is ideal for applications like automotive, surveillance, machine-to-machine, automation, printer, and home networking.

#### NOR

NOR products are non-volatile re-writable semiconductor memory devices that provide fast read speeds. NOR is most commonly used for reliable code storage (e.g., boot, application, operating system, and execute-in-place code in an embedded system) and for frequently changing small data storage and is ideal for automotive, industrial, and consumer applications.

### **Results of Due Diligence Review**

#### Reported Smelters and Refiners Used to Process 3TG Metals

Throughout 2023, we worked with our suppliers in an effort to source only from smelters and refiners that were validated as Conformant with a responsibly-sourced auditing program. We identified 211 smelters and refiners that are recognized by RMI, LBMA, or RJC to be processors of 3TG metals and that we believe were potentially in our memory and storage products supply chain for the year ended

December 31, 2023, none of which had a Non-Conformant status with RMI at the time they entered our supply chain. 27 smelters and refiners that were reported to be in our memory and storage products supply chain during 2023 were subsequently determined, on or prior to December 31, 2023, to be inoperative or removed. We determined that 184 smelters and refiners were in our memory and storage products supply chain as of December 31, 2023, of which 183 were validated as Conformant and one was listed as Active with RMI. As described above, as a result of our continued diligence efforts, the Active refiner was removed from our supply chain in 2024.

Many of our suppliers reported smelter and refiner information at the company level rather than limiting their responses to smelters and refiners associated with products sold to Micron. As a result, some reported smelters and refiners may not be associated with our memory and storage products. Appendix A sets forth a list of the names and locations of all of the potential smelters and refiners in our memory and storage products supply chain as reported by our suppliers for the year ended December 31, 2023.

#### Aggregated Countries of Origin of 3TG Metals

Our due diligence efforts did not result in sufficient information to conclusively determine the countries of origin of all necessary 3TG metals in our products. Appendix B sets forth a list of potential countries of origin of 3TG metals that may be in our products based on information provided to us by our suppliers and RMI, all of which information is available to us (and is therefore being disclosed) on an aggregated basis only for RMAP Conformant smelters.

#### Mine or Location of Origin

RMI has an established audit protocol to assess whether smelters and refiners of 3TG metals employed policies, practices, and procedures to source responsibly-sourced minerals. RMI, through the RMAP, collects and provides access for its members to certain information regarding the origin of minerals processed at RMAP responsibly-sourced smelters and refiners.

We required the suppliers in our memory and storage products supply chain to complete the RMI CMRT. We reviewed the supplier responses as well as information available through the RMI on the mine or location of origin of 3TG metals processed by these smelters and refiners collectively. Our suppliers' responses and the RMI's information did not provide sufficiently detailed information for us to determine the mine or location of origin of the necessary 3TG in our products for the calendar year 2023.

## **4. 2024 Due Diligence Improvement Measures**

During the 2024 reporting year, Micron intends to:

- Continue to engage with and provide active participation and leadership in the various RMI working groups;
- Continue to proactively engage with all suppliers in an effort to accomplish our goal that all smelters and refiners in our supply chain are Conformant;
- Continue to refine and improve our responsible minerals program to ensure quick remediation, including removal, of any smelter or refiner that loses Conformant status; and
- Expand our responsible minerals program to ensure responsible sourcing of additional minerals beyond 3TG and include more geographies as practicable in line with industry standards and RMI capabilities and programs.

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*This Conflict Minerals Report contains forward looking statements related to our conflict minerals due diligence programs for 2024. We wish to caution you that such statements are predictions and that actual events or results may differ materially. Although we believe that the expectations reflected in the forward-*

*looking statements are reasonable, we cannot guarantee future results, levels of activity, performance or achievements. We are under no duty to update any of the forward-looking statements to conform these statements to actual results.*

# Appendix A

## Reported 3TG Smelters and Refiners List

This table provides the names and locations of all of the potential 3TG smelters and refiners in our memory and storage products supply chain that were reported by our suppliers for the year ended December 31, 2023. The smelter and refiner names and locations appear as they are listed in the RMI Smelter Database as of January 26, 2024. We cannot confirm which of the smelters and refiners in this table processed the necessary 3TG metals contained in our products, as many of our suppliers identified all smelters and refiners in their total supply chain rather than just those smelters and refiners associated with products sold to us.

| <b>Metal</b> | <b>Smelter or Refinery Name</b>                                 | <b>Location</b>      |
|--------------|---|----------------------|
| Gold         | 8853 S.p.A.*  | Italy                |
| Gold         | Advanced Chemical Company**                                     | United States        |
| Gold         | Agosi AG  | Germany              |
| Gold         | Aida Chemical Industries Co., Ltd.                              | Japan                |
| Gold         | Al Etihad Gold Refinery DMCC*                                   | United Arab Emirates |
| Gold         | Almalyk Mining and Metallurgical Complex (AMMC)                 | Uzbekistan           |
| Gold         | AngloGold Ashanti Corrego do Sitio Mineracao                    | Brazil               |
| Gold         | Argor-Heraeus S.A.  | Switzerland          |
| Gold         | Asahi Pretec Corp.  | Japan                |
| Gold         | Asahi Refining Canada Ltd.                                      | Canada               |
| Gold         | Asahi Refining USA Inc.   | United States        |
| Gold         | Aurubis AG  | Germany              |
| Gold         | Bangalore Refinery*   | India                |
| Gold         | Bangko Sentral ng Pilipinas (Central Bank of the Philippines)   | Philippines          |
| Gold         | Boliden Ronnskar  | Sweden               |
| Gold         | C. Hafner GmbH + Co. KG   | Germany              |
| Gold         | CCR Refinery - Glencore Canada Corporation                      | Canada               |
| Gold         | Cendres + Metaux S.A.*  | Switzerland          |
| Gold         | Chimet S.p.A.   | Italy                |
| Gold         | Dowa  | Japan                |
| Gold         | Emirates Gold DMCC*   | United Arab Emirates |
| Gold         | Gold Refinery of Zijin Mining Group Co., Ltd.                   | China                |
| Gold         | Heimerle + Meule GmbH   | Germany              |
| Gold         | Heraeus Germany GmbH Co. KG                                     | Germany              |
| Gold         | Heraeus Metals Hong Kong Ltd.                                   | China                |
| Gold         | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | China                |
| Gold         | Ishifuku Metal Industry Co., Ltd.                               | Japan                |
| Gold         | Istanbul Gold Refinery  | Turkey               |
| Gold         | Italpreziosi  | Italy                |
| Gold         | Japan Mint  | Japan                |
| Gold         | Jiangxi Copper Co., Ltd.  | China                |

| <b>Metal</b> | <b>Smelter or Refinery Name</b>                             | <b>Location</b>          |
|--------------|---|--------------------------|
| Gold         | JX Nippon Mining & Metals Co., Ltd.                         | Japan                    |
| Gold         | Kazzinc   | Kazakhstan               |
| Gold         | Kennecott Utah Copper LLC                                   | United States            |
| Gold         | KGHM Polska Miedz Spolka Akcyjna                            | Poland                   |
| Gold         | Kojima Chemicals Co., Ltd.                                  | Japan                    |
| Gold         | Korea Zinc Co., Ltd.  | South Korea              |
| Gold         | L'Orfebre S.A.  | Andorra                  |
| Gold         | LS MnM Inc.   | South Korea              |
| Gold         | LT Metal Ltd.   | South Korea              |
| Gold         | Matsuda Sangyo Co., Ltd.                                    | Japan                    |
| Gold         | Metal Concentrators SA (Pty) Ltd.                           | South Africa             |
| Gold         | Metalor Technologies (Hong Kong) Ltd.                       | China                    |
| Gold         | Metalor Technologies (Singapore) Pte., Ltd.                 | Singapore                |
| Gold         | Metalor Technologies (Suzhou) Ltd.                          | China                    |
| Gold         | Metalor Technologies S.A.                                   | Switzerland              |
| Gold         | Metalor USA Refining Corporation                            | United States            |
| Gold         | Metalurgica Met-Mex Penoles S.A. De C.V.                    | Mexico                   |
| Gold         | Mitsubishi Materials Corporation                            | Japan                    |
| Gold         | Mitsui Mining and Smelting Co., Ltd.                        | Japan                    |
| Gold         | MKS PAMP SA   | Switzerland              |
| Gold         | MMTC-PAMP India Pvt., Ltd.                                  | India                    |
| Gold         | Nadir Metal Rafineri San. Ve Tic. A.S.                      | Turkey                   |
| Gold         | Navoi Mining and Metallurgical Combinat                     | Uzbekistan               |
| Gold         | NH Recytech Company   | South Korea              |
| Gold         | Nihon Material Co., Ltd.                                    | Japan                    |
| Gold         | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH | Austria                  |
| Gold         | Planta Recuperadora de Metales SpA                          | Chile                    |
| Gold         | PT Aneka Tambang (Persero) Tbk                              | Indonesia                |
| Gold         | PX Precinox S.A.  | Switzerland              |
| Gold         | Rand Refinery (Pty) Ltd.                                    | South Africa             |
| Gold         | Royal Canadian Mint   | Canada                   |
| Gold         | SAAMP*  | France                   |
| Gold         | Safimet S.p.A*  | Italy                    |
| Gold         | SAFINA A.S.   | Czechia (Czech Republic) |
| Gold         | Samduck Precious Metals*                                    | South Korea              |
| Gold         | SEMPSA Joyeria Plateria S.A.                                | Spain                    |
| Gold         | Shandong Gold Smelting Co., Ltd.                            | China                    |
| Gold         | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.           | China                    |
| Gold         | Sichuan Tianze Precious Metals Co., Ltd.                    | China                    |
| Gold         | Singway Technology Co., Ltd.*                               | Taiwan                   |
| Gold         | Solar Applied Materials Technology Corp.                    | Taiwan                   |

| <b>Metal</b> | <b>Smelter or Refinery Name</b>                      | <b>Location</b> |
|--------------|--|-----------------|
| Gold         | Sumitomo Metal Mining Co., Ltd.                      | Japan           |
| Gold         | T.C.A S.p.A  | Italy           |
| Gold         | Tanaka Kikinzoku Kogyo K.K.                          | Japan           |
| Gold         | Tokuriki Honten Co., Ltd.                            | Japan           |
| Gold         | TOO Tau-Ken-Altyn                                    | Kazakhstan      |
| Gold         | Torecom  | South Korea     |
| Gold         | Umicore Precious Metals Thailand*                    | Thailand        |
| Gold         | Umicore S.A. Business Unit Precious Metals Refining  | Belgium         |
| Gold         | United Precious Metal Refining, Inc.*                | United States   |
| Gold         | Valcambi S.A.  | Switzerland     |
| Gold         | Western Australian Mint (T/a The Perth Mint)         | Australia       |
| Gold         | WIELAND Edelmetalle GmbH*                            | Germany         |
| Gold         | Zhongyuan Gold Smelter of Zhongjin Gold Corporation  | China           |
| Tantalum     | AMG Brasil   | Brazil          |
| Tantalum     | Changsha South Tantalum Niobium Co., Ltd.*           | China           |
| Tantalum     | D Block Metals, LLC                                  | United States   |
| Tantalum     | Exotech Inc.*  | United States   |
| Tantalum     | F&X Electro-Materials Ltd.                           | China           |
| Tantalum     | FIR Metals & Resource Ltd.                           | China           |
| Tantalum     | Global Advanced Metals Aizu*                         | Japan           |
| Tantalum     | Global Advanced Metals Boyertown                     | United States   |
| Tantalum     | Hengyang King Xing Lifeng New Materials Co., Ltd.    | China           |
| Tantalum     | Jiangxi Dinghai Tantalum & Niobium Co., Ltd.         | China           |
| Tantalum     | Jiangxi Tuohong New Raw Material                     | China           |
| Tantalum     | JiuJiang JinXin Nonferrous Metals Co., Ltd.          | China           |
| Tantalum     | Jiujiang Tanbre Co., Ltd.                            | China           |
| Tantalum     | Jiujiang Zhongao Tantalum & Niobium Co., Ltd.        | China           |
| Tantalum     | KEMET de Mexico                                      | Mexico          |
| Tantalum     | Materion Newton Inc.                                 | United States   |
| Tantalum     | Metallurgical Products India Pvt., Ltd.              | India           |
| Tantalum     | Mineracao Taboca S.A.                                | Brazil          |
| Tantalum     | Mitsui Mining and Smelting Co., Ltd.                 | Japan           |
| Tantalum     | Ningxia Orient Tantalum Industry Co., Ltd.           | China           |
| Tantalum     | NPM Silmet AS  | Estonia         |
| Tantalum     | QSIL Metals Hermsdorf GmbH*                          | Germany         |
| Tantalum     | Resind Industria e Comercio Ltda.                    | Brazil          |
| Tantalum     | RFH Yancheng Jinye New Material Technology Co., Ltd. | China           |
| Tantalum     | TANIOBIS Co., Ltd.                                   | Thailand        |
| Tantalum     | TANIOBIS GmbH  | Germany         |
| Tantalum     | TANIOBIS Japan Co., Ltd.                             | Japan           |
| Tantalum     | TANIOBIS Smelting GmbH & Co. KG                      | Germany         |

| <b>Metal</b> | <b>Smelter or Refinery Name</b>                   | <b>Location</b> |
|--------------|---|-----------------|
| Tantalum     | Telex Metals                                      | United States   |
| Tantalum     | Ulba Metallurgical Plant JSC                      | Kazakhstan      |
| Tantalum     | XIMEI RESOURCES (GUANGDONG) LIMITED               | China           |
| Tantalum     | XinXing HaoRong Electronic Material Co., Ltd.*    | China           |
| Tantalum     | Yanling Jincheng Tantalum & Niobium Co., Ltd.     | China           |
| Tin          | Alpha   | United States   |
| Tin          | Aurubis Beerse                                    | Belgium         |
| Tin          | Aurubis Berango                                   | Spain           |
| Tin          | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | China           |
| Tin          | Chifeng Dajingzi Tin Industry Co., Ltd.*          | China           |
| Tin          | China Tin Group Co., Ltd.                         | China           |
| Tin          | CV Ayi Jaya                                       | Indonesia       |
| Tin          | CV Venus Inti Perkasa                             | Indonesia       |
| Tin          | DS Myanmar  | Myanmar         |
| Tin          | EM Vinto  | Bolivia         |
| Tin          | Estanho de Rondonia S.A.                          | Brazil          |
| Tin          | Fabrica Auricchio Industria e Comercio Ltda.      | Brazil          |
| Tin          | Fenix Metals                                      | Poland          |
| Tin          | Gejiu Non-Ferrous Metal Processing Co., Ltd.      | China           |
| Tin          | Gejiu Zili Mining And Metallurgy Co., Ltd.*       | China           |
| Tin          | Guangdong Hanhe Non-Ferrous Metal Co., Ltd.       | China           |
| Tin          | HuiChang Hill Tin Industry Co., Ltd.              | China           |
| Tin          | Jiangxi New Nanshan Technology Ltd.               | China           |
| Tin          | Luna Smelter, Ltd.                                | Rwanda          |
| Tin          | Ma'anshan Weitai Tin Co., Ltd.*                   | China           |
| Tin          | Magnu's Minerais Metais e Ligas Ltda.             | Brazil          |
| Tin          | Malaysia Smelting Corporation (MSC)               | Malaysia        |
| Tin          | Metallic Resources, Inc.                          | United States   |
| Tin          | Mineracao Taboca S.A.                             | Brazil          |
| Tin          | Minsur  | Peru            |
| Tin          | Operaciones Metalurgicas S.A.                     | Bolivia         |
| Tin          | PT Aries Kencana Sejahtera                        | Indonesia       |
| Tin          | PT Artha Cipta Langgeng                           | Indonesia       |
| Tin          | PT ATD Makmur Mandiri Jaya                        | Indonesia       |
| Tin          | PT Babel Inti Perkasa                             | Indonesia       |
| Tin          | PT Babel Surya Alam Lestari                       | Indonesia       |
| Tin          | PT Bangka Serumpun                                | Indonesia       |
| Tin          | PT Bukit Timah                                    | Indonesia       |
| Tin          | PT Cipta Persada Mulia                            | Indonesia       |
| Tin          | PT Menara Cipta Mulia                             | Indonesia       |
| Tin          | PT Mitra Stania Prima                             | Indonesia       |

| <b>Metal</b> | <b>Smelter or Refinery Name</b>  | <b>Location</b> |
|--------------|--|-----------------|
| Tin          | PT Mitra Sukses Globalindo   | Indonesia       |
| Tin          | PT Prima Timah Utama   | Indonesia       |
| Tin          | PT Putera Sarana Shakti (PT PSS)   | Indonesia       |
| Tin          | PT Rajawali Rimba Perkasa  | Indonesia       |
| Tin          | PT Rajehan Ariq  | Indonesia       |
| Tin          | PT Refined Bangka Tin  | Indonesia       |
| Tin          | PT Sariwiguna Binasentosa  | Indonesia       |
| Tin          | PT Stanindo Inti Perkasa   | Indonesia       |
| Tin          | PT Sukses Inti Makmur (SIM)  | Indonesia       |
| Tin          | PT Timah Nusantara   | Indonesia       |
| Tin          | PT Timah Tbk Kundur  | Indonesia       |
| Tin          | PT Timah Tbk Mentok  | Indonesia       |
| Tin          | PT Tinindo Inter Nusa  | Indonesia       |
| Tin          | PT Tommy Utama   | Indonesia       |
| Tin          | Resind Industria e Comercio Ltda.  | Brazil          |
| Tin          | Rui Da Hung  | Taiwan          |
| Tin          | Soft Metais Ltda.*   | Brazil          |
| Tin          | Thaisarco  | Thailand        |
| Tin          | Tin Smelting Branch of Yunnan Tin Co., Ltd.                                    | China           |
| Tin          | White Solder Metalurgia e Mineracao Ltda.                                      | Brazil          |
| Tin          | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.                                  | China           |
| Tungsten     | A.L.M.T. Corp.   | Japan           |
| Tungsten     | ACL Metais Eireli*   | Brazil          |
| Tungsten     | Asia Tungsten Products Vietnam Ltd.  | Vietnam         |
| Tungsten     | China Molybdenum Tungsten Co., Ltd.  | China           |
| Tungsten     | Chongyi Zhangyuan Tungsten Co., Ltd.   | China           |
| Tungsten     | Cronimet Brasil Ltda   | Brazil          |
| Tungsten     | Fujian Ganmin RareMetal Co., Ltd.*   | China           |
| Tungsten     | Fujian Xinlu Tungsten Co., Ltd.  | China           |
| Tungsten     | Ganzhou Haichuang Tungsten Co., Ltd.   | China           |
| Tungsten     | Ganzhou Huaxing Tungsten Products Co., Ltd.*                                   | China           |
| Tungsten     | Ganzhou Jiangwu Ferrotungsten Co., Ltd.  | China           |
| Tungsten     | Ganzhou Seadragon W & Mo Co., Ltd.   | China           |
| Tungsten     | Global Tungsten & Powders LLC  | United States   |
| Tungsten     | Guangdong Xianglu Tungsten Co., Ltd.   | China           |
| Tungsten     | H.C. Starck Tungsten GmbH  | Germany         |
| Tungsten     | Hunan Chenzhou Mining Co., Ltd.  | China           |
| Tungsten     | Hunan Jintai New Material Co., Ltd.*   | China           |
| Tungsten     | Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch | China           |
| Tungsten     | Japan New Metals Co., Ltd.   | Japan           |
| Tungsten     | Jiangwu H.C. Starck Tungsten Products Co., Ltd.                                | China           |

| <b>Metal</b> | <b>Smelter or Refinery Name</b>                               | <b>Location</b> |
|--------------|---|-----------------|
| Tungsten     | Jiangxi Gan Bei Tungsten Co., Ltd.                            | China           |
| Tungsten     | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | China           |
| Tungsten     | Jiangxi Xinsheng Tungsten Industry Co., Ltd.                  | China           |
| Tungsten     | Jiangxi Yaosheng Tungsten Co., Ltd.                           | China           |
| Tungsten     | Kennametal Fallon   | United States   |
| Tungsten     | Kennametal Huntsville   | United States   |
| Tungsten     | Malipo Haiyu Tungsten Co., Ltd.                               | China           |
| Tungsten     | Masan High-Tech Materials                                     | Vietnam         |
| Tungsten     | Moliren Ltd.†   | Russia          |
| Tungsten     | Niagara Refining LLC  | United States   |
| Tungsten     | Philippine Chuangxin Industrial Co., Inc.                     | Philippines     |
| Tungsten     | TANIOBIS Smelting GmbH & Co. KG                               | Germany         |
| Tungsten     | Wolfram Bergbau und Hutten AG                                 | Austria         |
| Tungsten     | Xiamen Tungsten (H.C.) Co., Ltd.                              | China           |
| Tungsten     | Xiamen Tungsten Co., Ltd.                                     | China           |
| Tungsten     | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.*  | China           |

- \* The smelter/refiner was reported to be in our memory and storage products supply chain during 2023 and was subsequently determined, on or prior to December 31, 2023, to be inoperative or removed. Up-to-date information on the validation status of smelters and refiners participating in the RMAP is available at [responsiblemineralsinitiative.org/smelters-refiners-lists](https://responsiblemineralsinitiative.org/smelters-refiners-lists).
- \*\* The refiner was listed as Active with RMI as of December 31, 2023. As described in the Conflict Minerals Report, as a result of our continued diligence efforts, the Active refiner was removed from our supply chain in 2024.
- † The smelter was removed from our supply chain on or prior to December 31, 2023 due to sanctions imposed on Russia and resulting changes to the smelter's RMAP conformance status.

# Appendix B

## Aggregated Countries of Origin List

This table sets forth an aggregated list of countries (or regions) of origin for 3TG metals that may be in our products based on information available from RMI on countries of origin for smelters or refiners that have been validated as Conformant with the RMAP. Due to confidential business information concerns, RMI provides this country of origin information on an aggregated basis. This table reflects information available from RMI as of December 31, 2023.

|                                  |               |                       |                           |
|----------------------------------|---------------|-----------------------|---------------------------|
| Algeria                          | Ecuador       | Liechtenstein         | Saudi Arabia              |
| Andorra                          | Egypt         | Lithuania             | Senegal                   |
| Antigua and Barbuda              | El Salvador   | Luxembourg            | Serbia                    |
| Argentina                        | Estonia       | Macau                 | Sierra Leone              |
| Australia                        | Fiji          | Madagascar            | Singapore                 |
| Austria                          | Finland       | Malaysia              | Sint Maarten              |
| Azerbaijan                       | France        | Mali                  | Slovakia                  |
| Bahamas                          | French Guiana | Malta                 | Slovenia                  |
| Bangladesh                       | Georgia       | Mauritania            | South Africa              |
| Barbados                         | Germany       | Mauritius             | South Korea               |
| Belarus                          | Ghana         | Mexico                | Spain                     |
| Belgium                          | Greece        | Monaco                | St Vincent and Grenadines |
| Benin                            | Grenada       | Mongolia              | Sudan                     |
| Bolivia                          | Guatemala     | Morocco               | Suriname                  |
| Bosnia and Herzegovina           | Guinea        | Mozambique            | Sweden                    |
| Botswana                         | Guyana        | Myanmar               | Switzerland               |
| Brazil                           | Honduras      | Namibia               | Tajikistan                |
| Bulgaria                         | Hong Kong     | Netherlands           | Tanzania                  |
| Burkina Faso                     | Hungary       | New Zealand           | Thailand                  |
| Burundi                          | Iceland       | Nicaragua             | Trinidad and Tobago       |
| Cambodia                         | India         | Niger                 | Tunisia                   |
| Cameroon                         | Indonesia     | Nigeria               | Turkey                    |
| Canada                           | Ireland       | Norway                | Turks and Caicos          |
| Chile                            | Israel        | Oman                  | Uganda                    |
| China                            | Italy         | Pakistan              | Ukraine                   |
| Chinese Taipei (Taiwan)          | Jamaica       | Panama                | United Arab Emirates      |
| Colombia                         | Japan         | Papua New Guinea      | United Kingdom            |
| Costa Rica                       | Jordan        | Peru                  | United States             |
| Côte d'Ivoire                    | Kazakhstan    | Philippines           | Uruguay                   |
| Croatia                          | Kenya         | Poland                | Uzbekistan                |
| Curacao                          | Kuwait        | Portugal              | Vietnam                   |
| Cyprus                           | Kyrgyzstan    | Puerto Rico           | Zambia                    |
| Czechia (Czech Republic)         | Laos          | Romania               | Zimbabwe                  |
| Democratic Republic of the Congo | Latvia        | Russia                |                           |
| Denmark                          | Lebanon       | Rwanda                |                           |
| Dominican Republic               | Liberia       | Saint Kitts and Nevis |                           |

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

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**FORM SD**

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**Specialized Disclosure Report**

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**INTEL CORPORATION**

(Exact name of the registrant as specified in its charter)

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**Delaware**

(State or other jurisdiction  
of incorporation)

**000-06217**

(Commission  
File Number)

**2200 Mission College Boulevard,**

(Address of principal executive offices)

**Santa Clara,**

**California**

**95054-1549**

(Zip Code)

**April Miller Boise**

(408) 765-8080

(Name and telephone number, including area code, of the person to contact in connection with this report.)

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Check the appropriate box to indicate the rule pursuant to which this form is being filed:

- Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2023
- Rule 13q-1 under the Securities Exchange Act (17 CFR 240.13q-1) for the reporting period for the fiscal year ended \_\_\_\_\_.
- 
-

## **SECTION 1 – CONFLICT MINERALS DISCLOSURE**

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

#### **Conflict Minerals Disclosure**

This Specialized Disclosure Report on Form SD and the Conflict Minerals Report, filed as Exhibit 1.01 hereto, are publicly available at [www.intc.com](http://www.intc.com) and [www.intel.com/responsibleminerals](http://www.intel.com/responsibleminerals) as well as the SEC's EDGAR database at [www.sec.gov](http://www.sec.gov).

### ***Item 1.02 Exhibit***

The Conflict Minerals Report required by Item 1.01 is filed as Exhibit 1.01 to this Form SD.

## **SECTION 3 – EXHIBITS**


### ***Item 3.01 Exhibits***

[Exhibit 1.01 – Conflict Minerals Report as required by Items 1.01 and 1.02 of this Form SD.](#)

**SIGNATURES**

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

**INTEL CORPORATION**  
(Registrant)

By:  \_\_\_\_\_  
2AAE22DEF9714AC...

April Miller Boise  
Executive Vice President and Chief Legal Officer

May \_\_\_\_, 2024  
Date

**CONFLICT MINERALS REPORT****INTEL CORPORATION****IN ACCORD WITH RULE 13P-1 UNDER THE SECURITIES EXCHANGE ACT OF 1934**

This Conflict Minerals Report (Report) of Intel Corporation (Intel or we) for the year ended December 31, 2023 is presented to comply with Rule 13p-1 under the Securities Exchange Act of 1934, as amended (the Rule). The Rule was adopted by the Securities and Exchange Commission (SEC) to implement reporting requirements related to “conflict minerals,” defined by the SEC as columbite-tantalite (coltan), cassiterite, gold, wolframite, and their derivatives, which are currently limited to tantalum, tin, and tungsten.

The Rule imposes certain reporting obligations on SEC registrants whose products contain conflict minerals that are necessary to the functionality or production of their products (referred to as “conflict minerals”). For products that contain necessary conflict minerals, the registrant must conduct in good faith a reasonable country of origin inquiry designed to determine whether any of the necessary conflict minerals originated in the Democratic Republic of the Congo (DRC) or an adjoining country (collectively, the “Covered Countries”). If, based on such inquiry, the registrant knows or has reason to believe that any of the necessary conflict minerals originated or may have originated in a Covered Country and may not be solely from recycled or scrap sources, the registrant must conduct due diligence to determine if the necessary conflict minerals directly or indirectly financed or benefited armed groups (as defined by the SEC in Form SD) in the Covered Countries.

**Overview of Intel’s Responsible Minerals Program and Commitment to Responsible Sourcing**

As set forth in our Responsible Minerals Sourcing Policy, Intel is committed to the responsible sourcing of minerals, which we define as sourcing done in an ethical and sustainable manner that safeguards the human rights of everyone in our global supply chain. Intel’s responsible minerals program continues to expand in scope to include additional minerals, such as cobalt, and we annually evaluate whether additional minerals should be prioritized for inclusion in our due diligence program. In 2023, the minerals we added to our due diligence efforts included aluminum, copper, nickel, and zinc with cerium, lanthanum, gallium, germanium, and hafnium added in 2024. We also continue to examine human rights risks in Conflict-Affected and High-Risk Areas (CAHRAs) globally, as defined by 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, Third Edition*, and related Supplements on Tin, Tantalum and Tungsten and on Gold (collectively, “OECD Guidance”). While the focus of this Report is on conflict minerals and the Covered Countries, Intel is electing to also describe the proactive due diligence we began several years ago around cobalt as well as Intel’s public goal to responsibly source additional minerals used in semiconductor manufacturing. In Intel’s annual Corporate Responsibility Report published in May 2020, we established a new 2030 strategy and goals for continued progress for the next decade in multiple areas of corporate responsibility, including responsible minerals sourcing. An overview of this initiative and the practical steps to be taken to responsibly source beyond conflict minerals is described in a separate section below.

As we expand our program, we also continue to strengthen our approach for responsible sourcing of conflict minerals and to support the improvement of conditions of the mining communities in the Covered Countries. Many of our hardware products contain tantalum, tin, tungsten and/or gold necessary to the functionality or production of those products. Conflict

minerals are obtained from sources worldwide, and our desire is not to eliminate those originating in the Covered Countries and other CAHRAs, but rather to obtain conflict minerals from sources that do not directly or indirectly finance or benefit armed groups or contribute to human rights abuses. We believe that it is important for us and other companies to support responsible in-region mineral sourcing from the Covered Countries and other CAHRAs and to not negatively affect the economies of such countries.

We have worked extensively for over a dozen years on the issue of conflict minerals, as part of our work on responsible mineral sourcing. We believe that broad collaborative efforts among governments, non-governmental organizations (NGOs), civil society experts, and industry are needed to identify and mitigate the risk of contributing to serious human rights abuses and conflict related to mineral extraction in the Covered Countries. Intel is a steering committee member of the Responsible Minerals Initiative (RMI), unique member code INTC, and active contributor to multiple RMI sub-teams. Intel is also an active member of the OECD Multi-Stakeholder Steering Group, which advises on implementation for the OECD Guidance, and the European Partnership for Responsible Minerals (EPRM), where we collaborate with companies in electronics and other industries (e.g. jewelry, automotive, medical instrumentation, and others) and other stakeholders, such as public authorities and civil society groups, to address responsible mineral sourcing issues. Intel also holds a leadership position in the Public-Private Alliance for Responsible Minerals Trade (PPA), which promotes responsibly sourced minerals from the Covered Countries. We are also part of the CRAFT Code Committee, which assisted in the development of the *Code of Risk-mitigation for Artisanal and Small-Scale Mining engaging in Formal Trade (CRAFT)*.

At Intel, we are committed to helping the most vulnerable communities tied to our global supply chain. A few examples of projects supported by Intel in 2023 are Congo Power, an alliance providing mining areas with clean power, and PACT-RMI Youth Vocational Training Program, aimed at providing mining alternatives to Congolese youths. Additionally, we seek to assist Artisanal and Small-Scale Mining (ASM) sites in protecting the rights of the miners as well as meeting downstream compliance requirements. In 2023, we provided this support through the Better Mining ASM Mine Monitoring Program in collaboration with Responsible Minerals Initiative (RMI) and RCS Global. We also are supporters of a Sustainable Development project focusing on ASM Copper Mining in Peru led by The Copper Mark and Alliance for Responsible Mining (ARM). In partnership with Solidaridad and IMPACT, Intel also supported Esawa, a digital suite of tools, designed specifically for the ASM sector, which is expected to create new pathways to track, access, and share data about practices in mining communities. Maintaining a connection and providing support to the communities that we depend on in our vast global supply chain is a crucial component to our responsible minerals program.

## **Products and Supply Chain Description**

The Intel products we manufactured or contracted with others to manufacture that may contain necessary conflict minerals, and which are covered in this Report, include the following:

- Our microprocessor and chipset products, such as our Intel® Core™, Intel® Xeon®, and Intel Atom® processors
- Our accelerator products, such as our FPGA products, and Habana AI accelerators
- Our connectivity products, such as our Intel® Tofino™ switch ASICs and Intel® Silicon Photonics products

Mobileye EyeQ® and other Mobileye® products are not included in this Report. In the fourth quarter of 2022, Mobileye Global Inc. completed its initial public offering. As of December 31, 2023, Intel held approximately 88% of the outstanding equity interest in Mobileye. For information on Mobileye products, please see Mobileye's Form SD and CMR.

Most of our hardware products, primarily microprocessors, chipsets, and their packages, are manufactured in our own network of fabrication facilities (fabs). Intel also sells products that are manufactured for us by other companies and products that include ready-made component parts that we purchase from third parties. Although many of our hardware products contain conflict minerals, we do not purchase ore or unrefined conflict minerals from mines. We are many steps

removed in the supply chain from the mining of minerals and are therefore considered a “downstream” purchaser. We purchase materials used in our products from a large network of suppliers; some of those materials contribute necessary conflict minerals to our products. The origin of minerals cannot be determined with any certainty once the ores are smelted, refined, and converted to ingots, bullion, or other derivatives. The smelters and refiners (referred to as “facilities”) are consolidating points for ore and are in the best position in the total supply chain to know the origin of the ores. We rely on our suppliers to assist with our reasonable country of origin inquiry and due diligence efforts, including the identification of smelters and refiners, for the minerals contained in the materials which they supply to us.

## **Design of Responsible Minerals Program**

Intel’s responsible minerals program is designed to conform with the OECD Guidance specifically as it relates to our position in the minerals supply chain as a “downstream” purchaser. Summarized below are the design components of our responsible minerals program as they relate to the five-step framework from the OECD Guidance. While our program encompasses a broad scope of minerals and regional areas, the summary of Steps 2 through 5 below focuses on the application of our program to conflict minerals and the Covered Countries.

### **1. Maintain strong company management systems:**

- **Responsible Minerals Sourcing Policy:** Maintain a supply chain policy for minerals originating from CAHRAs, including conflict minerals originating from the Covered Countries. This policy outlines our commitment to responsible mineral sourcing from CAHRAs, our commitment to exercise due diligence consistent with the OECD Guidance, and expectations that our suppliers have similarly established due diligence programs. Our policy is publicly available and can be found at [www.intel.com/responsibleminerals](http://www.intel.com/responsibleminerals).
- **Internal Responsible Minerals team:** Operate an internal responsible minerals team led by our Manufacturing, Supply Chain & Operations team (MSO) to implement our Responsible Minerals Sourcing Policy. We review such efforts with our Chief Legal Officer (CLO) and senior management of MSO.
- **Supply chain control system:** Employ a supply chain system of controls and transparency through due diligence tools such as the Conflict Minerals Reporting Template (CMRT), a supply chain survey designed by RMI to identify the smelters and refiners that process the necessary conflict minerals contained in our products and the country of origin of those conflict minerals. We employ a database to assess due diligence information and maintain records relating to our responsible minerals program for at least five years, in accordance with our record retention guidelines.
- **Supplier engagement:** Feature requirements related to responsible mineral sourcing in our standard template for supplier contracts and specifications so that current and future suppliers are obligated to comply with our policies on responsible minerals sourcing, including participation in a supply chain survey and related due diligence activities. We communicate our Responsible Minerals Sourcing Policy and contractual requirements to relevant suppliers annually.
- **Company grievance mechanism:** Enable employees, suppliers, and other stakeholders to report any concerns relating to our responsible minerals program through our online corporate responsibility reporting and grievance mechanism found on our company website at <https://www.intel.com/content/www/us/en/corporate-responsibility/corporate-responsibility.html>.

## 2. Identify and assess risks in our supply chain:

- Identify smelters and refiners in our supply chain: Identify direct suppliers that supply products to Intel that may contribute necessary conflict minerals to our products. Conduct an annual supply chain survey requesting those direct suppliers to provide a conflict minerals declaration, using the CMRT, designed to identify the conflict minerals contained in the products they supply to Intel, the smelters and refiners that processed those conflict minerals, and the country of origin of those conflict minerals. We evaluate the completeness and accuracy of the suppliers' survey responses and contact suppliers whose survey response we identified as having contained incomplete or potentially inaccurate information to seek additional clarifying information.
- Identify the scope of the risk assessment: Our risk assessment is designed to identify risks in our supply chain. This includes direct suppliers not meeting our contractual requirements related to conflict minerals, as well as smelters and refiners that are not conformant to a responsible mineral assurance program or that we have reason to believe may source conflict minerals from the Covered Countries. We document mineral country of origin information for the smelters and refiners identified by the supply chain survey, as provided from sources including the supply chain survey, responsible mineral assurance programs, direct contact with smelters and refiners, and from publicly available sources such as smelter and refiner websites.
- Assess due diligence practices of smelters and refiners: Compare smelters and refiners identified by the supply chain survey against the list of facilities that are conformant to a responsible mineral assurance program such as RMI's Responsible Minerals Assurance Program (RMAP), and other RMI cross-recognized, independent third-party audit programs. Information regarding RMAP, as well as a list of RMI cross-recognized independent third-party audit programs can be found on RMI's website: <http://www.responsiblemineralsinitiative.org/minerals-due-diligence/recognized-standards-or-programs/>.
- Carry out spot checks of smelters and refiners: Conduct spot checks of smelter and refiner due diligence practices by attempting to visit those facilities that are not conformant to a responsible mineral assurance program and which allow our visit. Our smelter and refiner visits are designed to assess their due diligence practices, request country of origin and chain of custody information for the conflict minerals processed by the facilities and encourage and assist their participation in such a program. In cases where physical visitation is not possible, smelter and refiner due diligence may be conducted virtually, where appropriate.

## 3. Execute a strategy to respond to identified risks:

- Report findings to senior management: Provide progress reports to our CLO and MSO senior management summarizing information gathered during our annual supply chain survey, results from the risk assessment process and status of our risk mitigation efforts.
- Devise and adopt a risk management plan: Maintain a risk management plan that includes due diligence reviews of suppliers, smelters and refiners that may be sourcing or processing conflict minerals from Covered Countries and other CAHRAs that may not be from recycled or scrap sources. Our due diligence measures are significantly based on responsible mineral assurance programs that evaluate the procurement practices of the smelters and refiners that process and provide those conflict minerals to our supply chain.
- Implement a risk management plan: Perform risk mitigation efforts to bring suppliers into conformity with our Responsible Minerals Sourcing Policy or contractual requirements, which efforts may include working

with direct suppliers to consider an alternative source for the necessary conflict minerals. We attempt to contact smelter and refiner facilities that are not conformant to a responsible mineral assurance program to assess their due diligence practices, request country of origin and chain of custody information for the conflict minerals processed by the facilities and encourage and assist their participation in such a program.

- Ongoing risk monitoring: Monitor and track suppliers, smelters and refiners identified as not meeting the requirements set forth in our Responsible Minerals Sourcing Policy or contractual requirements to determine their progress in meeting those requirements.

4. **Support the development and implementation of independent third-party audits of smelters' and refiners' sourcing:**

- Support development and implementation of due diligence practices and tools such as the CMRT through our leadership in RMI's Steering Committee and participation within RMI sub-teams.
- Support development and implementation of the RMAP by defining the terms of the RMAP audit protocol in conjunction with RMI member companies and other industry groups.
- Support responsible mineral assurance programs that carry out independent third-party audits of smelter and refiner facilities, such as the RMAP, through our membership in RMI.

5. **Report on supply chain due diligence:**

- Publicly communicate our Responsible Minerals Sourcing Policy on our company website at [www.intel.com/responsibleminerals](http://www.intel.com/responsibleminerals).
- Report annually on our supply chain due diligence activities in our white paper titled "Intel's Efforts to Achieve a Responsibly Sourced Mineral Supply Chain" and Corporate Responsibility Report available on our company website at [www.intel.com/responsibleminerals](http://www.intel.com/responsibleminerals).

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

### **Description of Reasonable Country of Origin Inquiry Efforts**

For 2023, our Reasonable Country Of Origin Inquiry (RCOI) efforts for conflict minerals included conducting a supply chain survey of direct suppliers that we determined may contribute necessary conflict minerals to our products (referred to as "Surveyed Suppliers") using the CMRT. The supply chain surveys requested that suppliers identify the smelters and refiners and countries of origin of the conflict minerals in products they supply to us. We compared the smelters and refiners identified in the surveys against the lists of facilities that are conformant to a responsible mineral assurance program, such as the RMAP or RMI cross-recognized programs. RMAP and RMI cross-recognized programs provided country of origin data for conformant smelters and refiners, including on an aggregate basis in certain cases. We documented country of origin information for the smelter and refiner facilities identified by Surveyed Suppliers as provided from sources including the supply chain survey, responsible mineral assurance programs, direct contact with smelters and refiners, and from publicly available sources such as smelter and refiner websites, if we determined such publicly available sources to be reliable.

### **Results of Reasonable Country of Origin Inquiry Efforts**

For 2023, Intel conducted a supply chain survey of 91 suppliers that we determined may contribute necessary conflict minerals to our products.

The results of our RCOI as of March 1, 2024 were as follows:

- 100% of Surveyed Suppliers provided a CMRT in response to our supply chain survey request.
- The Surveyed Suppliers identified 226 operational smelter and refiner facilities that may process the necessary conflict minerals contained in the products provided to us.
- We know or have reason to believe that a portion of the conflict minerals processed by at least 40 of these 226 smelters and refiners may have originated in the Covered Countries and may not be solely from recycled or scrap sources.

### ***Conclusion Based on Reasonable Country of Origin Inquiry***

We have concluded in good faith that during 2023:

- Intel manufactured and contracted with others to manufacture products as to which conflict minerals are necessary to the functionality or production of our products.
- Based on our RCOI, we know or have reason to believe that a portion of the necessary conflict minerals contained in our products originated or may have originated in the Covered Countries and know or have reason to believe that those necessary conflict minerals may not be solely from recycled or scrap sources.

As a result of the above conclusion and pursuant to the Rule, we undertook due diligence measures on the source and chain of custody of the necessary conflict minerals in our products for which we had reason to believe may have originated from the Covered Countries and which may not have come from recycled or scrap sources. There is significant overlap between our RCOI efforts and our due diligence measures performed.

### **Description of Due Diligence Measures Performed**

Below is a description of the measures performed for this reporting period, as of March 1, 2024, to exercise due diligence on the source and chain of custody of the necessary conflict minerals contained in our products:

- Conducted a supply chain survey of suppliers that we identified may be supplying Intel with products that contain necessary conflict minerals using the CMRT, requesting country of origin information regarding the necessary conflict minerals and identification of smelters and refiners that process such minerals.
- Contacted Surveyed Suppliers on responses to supply chain surveys that we identified as having contained incomplete or potentially inaccurate information to seek additional clarifying information.
- Received a CMRT from 100% of our Surveyed Suppliers in response to our supply chain survey request.
- Compared smelters and refiners identified by Surveyed Suppliers against the list of facilities that are conformant to a responsible mineral assurance program.
- Monitored and tracked Surveyed Suppliers, and smelters and refiners identified by Surveyed Suppliers, which we identified as not meeting our Responsible Minerals Sourcing Policy or contractual requirements, to determine their progress in meeting those requirements.
- Performed risk mitigation efforts with Surveyed Suppliers we identified as not in conformity with our Responsible Minerals Sourcing Policy or contractual requirements by working with them to bring them into compliance.

- In 2023 met with 18 smelters and refiners to encourage and assist their participation in a responsible minerals assurance program if they were not yet participating and provide capacity-building and Corrective Action Plan (CAP) support for those undergoing their first audit.
- Provided two progress reports to MSO senior management and one progress report to our CLO that summarized the status of our responsible minerals program.

## **Results of our Due Diligence Measures**

### ***Inherent Limitations on Due Diligence Measures***

As a downstream purchaser of products that contain conflict minerals, our due diligence measures can provide only reasonable, not absolute, assurance regarding the source and chain of custody of the necessary conflict minerals. Our 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. We also rely, to a large extent, on information collected and provided by responsible mineral assurance programs. Such sources of information, as well as any of our smelters and refiner facility visits and publicly available sources, 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 our suppliers on a continuous, real-time basis. 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 we do not have direct contractual relationships with smelters and refiners, we rely on our direct suppliers and the entire supply chain 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. We directly seek sourcing data on a periodic basis from our direct suppliers, as well as certain smelters and refiners. We seek to use contract provisions requiring the suppliers to promptly update us in the event the sourcing data changes. Our due diligence processes are ongoing throughout the year.

### ***Surveyed Supplier Due Diligence Results***

Intel evaluated the accuracy and completeness of the responses to our supply chain surveys by our Surveyed Suppliers. We identified 12 Surveyed Suppliers whose initial survey response contained incomplete or potentially inaccurate information. We used various methods to identify the incomplete or inaccurate information in the Surveyed Supplier's response, including verification checks conducted by third-party software or by members of our internal Responsible Minerals team. When an incomplete or inaccurate response was identified, we contacted the applicable Surveyed Supplier, identified the incomplete or inaccurate information, and requested that the Surveyed Supplier correct the incomplete or potentially inaccurate information and provide an updated response. All 12 Surveyed Suppliers provided an updated CMRT that we determined, using the same evaluation criteria, to be complete and accurate.

Upon receiving a survey response identified to be complete and accurate based on our evaluation criteria, we further evaluated each response for conformity with our Responsible Minerals Sourcing Policy or contractual requirements. These requirements include that our Surveyed Suppliers must maintain a publicly available conflict minerals sourcing policy, provide a CMRT upon our request, and use smelters and refiners that are either conformant to a responsible mineral assurance program or have begun participating in such a program. We identified Surveyed Suppliers that were not fully compliant with applicable requirements and monitored and tracked these suppliers' progress in meeting the applicable requirements. We performed risk mitigation efforts by contacting each supplier, identifying action items that we

requested the supplier complete, and asking the supplier to provide an updated CMRT. Our risk mitigation efforts are specifically related to meeting our Responsible Minerals Sourcing Policy or contractual requirements, with the goal of bringing each Surveyed Supplier into compliance with such requirements.

As a result of these supplier due diligence activities, Intel determined that 100% of the Surveyed Suppliers were, as of March 1, 2024, in compliance with our Responsible Minerals Sourcing Policy or contractual requirements as set for 2023.

### ***Smelter and Refiner Due Diligence Results***

As of March 1, 2024, an aggregate of 226 operational smelters and refiners were identified by our Surveyed Suppliers as facilities that may process the necessary conflict minerals contained in the products these Surveyed Suppliers provided to Intel.

Intel conducted due diligence on the smelters and refiners reported during our survey process. Our due diligence activities are dominated by a regular process to determine and monitor whether the identified smelters and refiners are operational and therefore may contribute necessary conflict minerals to our final products, and whether they are conformant to a responsible mineral assurance program or have begun participating in such a program. We sought reliable information on the source and chain of custody of the conflict minerals processed by such facilities, including from publicly available sources, with the goal to determine if any of these facilities processed conflict minerals that may have originated from the Covered Countries and other CAHRAs, and may not be solely from recycled or scrap sources.

If a smelter or refiner in our supply chain was not yet conformant to a responsible mineral assurance program or had not yet begun participating in such a program, Intel and other RMI member companies proactively attempted to contact such facilities to request country of origin information for the conflict minerals the facilities processed, as well as to encourage and assist their participation in a responsible mineral assurance program and, in some cases, visited such facilities on-site. We monitored and tracked smelters and refiners that we identified as not being conformant to a responsible mineral assurance program or not having begun participating in such a program.

During the 2023 reporting year, we identified 39 smelter and refiner facilities reported in our supply chain that were not conformant to a responsible mineral assurance program or otherwise did not meet more stringent Intel requirements based on our due diligence investigations. These facilities were the focus of our smelter and refiner due diligence activities for this reporting period and, as a result of our activities, we reasonably concluded that as of March 1, 2024:

- 8 of these 39 smelter and refiner facilities have since become conformant to a responsible mineral sourcing program.
- 13 of these 39 smelter and refiner facilities have begun participating in a responsible mineral assurance program, but are not yet conformant. Based on Intel's due diligence, we have no reason to believe these facilities sourced conflict minerals from the Covered Countries.
- The remaining 18 facilities decided not to or were deemed not eligible to continue participating in a responsible mineral assurance program. All 18 smelters in our supply chain that were not conformant to a responsible mineral assurance program during 2023 have been successfully removed from our supply chain.

As result of our due diligence activities summarized above, we determined the following as of March 1, 2024:

- 99% of the 226 smelters and refiners identified by our Surveyed Suppliers are either conformant to a responsible mineral assurance program or have begun participating in such a program.
- Two smelters and refiners identified by our suppliers that are not participating in a responsible mineral assurance program became not conformant between January 1, 2024 and March 1, 2024. We communicated

the requirement to such suppliers to cease sourcing from these smelters and refiners and to update us confirming the changes. After March 1, 2024, we were able to remove these two smelters and refiners from our supply chain, but their presence is still reflected in all data analysis in this report.

- All 40 smelters and refiners that we know or have reason to believe may source conflict minerals from the Covered Countries, which may not be solely from recycled or scrap sources, are conformant to a responsible mineral assurance program.
- We have no reason to believe that any of the 226 smelter and refiner facilities directly or indirectly finance or benefit armed groups in the Covered Countries.

Below is a summary of the mineral country of origin information collected as of March 1, 2024 as a result of our due diligence activities. Intel does not source these materials directly. RMI provides Intel with a list of potential countries of origin, which includes all countries of origin compiled from RMI's member participants. The inclusion of a country on the list from RMI is not a final indicator that Intel utilized materials sourced from this country.

**Table 1**

| <b>Country of Origin</b>           | <b>Mineral</b> |                 |            |                 |
|------------------------------------|----------------|-----------------|------------|-----------------|
|                                    | <b>Gold</b>    | <b>Tantalum</b> | <b>Tin</b> | <b>Tungsten</b> |
| Argentina                          | Gold           |                 |            |                 |
| Australia                          | Gold           | Tantalum        | Tin        | Tungsten        |
| Austria                            |                |                 |            | Tungsten        |
| Azerbaijan                         | Gold           |                 |            |                 |
| Benin                              | Gold           |                 |            |                 |
| Bolivia                            | Gold           |                 | Tin        | Tungsten        |
| Botswana                           | Gold           |                 |            |                 |
| Brazil                             | Gold           | Tantalum        | Tin        | Tungsten        |
| Burkina Faso                       | Gold           |                 |            |                 |
| Burundi**                          |                | Tantalum        | Tin        | Tungsten        |
| Cambodia                           | Gold           |                 |            |                 |
| Canada                             | Gold           |                 |            |                 |
| Chile                              | Gold           |                 |            |                 |
| China                              | Gold           | Tantalum        | Tin        | Tungsten        |
| Colombia                           | Gold           |                 |            |                 |
| Côte d'Ivoire                      | Gold           |                 |            |                 |
| Democratic Republic of the Congo** | Gold           | Tantalum        | Tin        | Tungsten        |
| Dominican Republic                 | Gold           |                 |            |                 |
| Ecuador                            | Gold           |                 |            |                 |
| Egypt                              | Gold           |                 |            |                 |
| Ethiopia                           |                | Tantalum        |            |                 |
| Fiji                               | Gold           |                 |            |                 |
| Finland                            | Gold           |                 |            |                 |
| France                             |                | Tantalum        |            |                 |
| French Guiana                      | Gold           |                 |            |                 |
| Georgia                            | Gold           |                 |            |                 |
| Ghana                              | Gold           |                 |            |                 |

|                  |      |          |     |          |
|------------------|------|----------|-----|----------|
| Guatemala        | Gold |          |     |          |
| Guinea           | Gold |          |     |          |
| Guyana           | Gold |          |     |          |
| Honduras         | Gold |          |     |          |
| Hong Kong        | Gold |          |     |          |
| Indonesia        | Gold |          | Tin |          |
| Japan            | Gold |          |     |          |
| Kazakhstan       | Gold |          |     | Tungsten |
| Kenya            | Gold |          |     |          |
| Kyrgyzstan       | Gold |          |     |          |
| Laos             | Gold |          | Tin |          |
| Liberia          | Gold |          |     |          |
| Madagascar       |      | Tantalum |     |          |
| Malaysia         |      |          | Tin | Tungsten |
| Mali             | Gold |          |     |          |
| Mauritania       | Gold |          |     |          |
| Mexico           | Gold |          |     | Tungsten |
| Mongolia         | Gold |          | Tin | Tungsten |
| Morocco          | Gold |          |     |          |
| Mozambique       | Gold | Tantalum |     |          |
| Myanmar          |      |          | Tin | Tungsten |
| Namibia          | Gold |          |     |          |
| New Zealand      | Gold |          |     |          |
| Nicaragua        | Gold |          |     |          |
| Niger            | Gold |          |     |          |
| Nigeria          |      | Tantalum | Tin | Tungsten |
| Oman             | Gold |          |     |          |
| Panama           | Gold |          |     |          |
| Papua New Guinea | Gold |          |     |          |
| Peru             | Gold |          | Tin |          |
| Philippines      | Gold |          |     |          |
| Portugal         |      |          |     | Tungsten |
| Russia*          | Gold |          | Tin | Tungsten |
| Rwanda**         |      | Tantalum | Tin | Tungsten |
| Saudi Arabia     | Gold |          |     |          |
| Senegal          | Gold |          |     |          |
| Serbia           | Gold |          |     |          |
| Sierra Leone     |      | Tantalum |     |          |
| South Africa     | Gold |          |     |          |
| South Korea      | Gold |          |     |          |
| Spain            | Gold | Tantalum | Tin | Tungsten |
| Sudan            | Gold |          |     |          |
| Suriname         | Gold |          |     |          |
| Sweden           | Gold |          |     |          |
| Tanzania**       | Gold |          | Tin | Tungsten |

|                          |      |     |          |
|--------------------------|------|-----|----------|
| Thailand                 | Gold | Tin | Tungsten |
| Turkey                   | Gold |     |          |
| Uganda**                 |      |     | Tungsten |
| United Kingdom           |      | Tin | Tungsten |
| United States of America | Gold |     | Tungsten |
| Uzbekistan               | Gold |     |          |
| Vietnam                  |      | Tin | Tungsten |
| Zambia**                 | Gold |     |          |
| Zimbabwe                 | Gold |     |          |

\* This reported RCOI list includes information covering all of 2023. Following Russia’s invasion of Ukraine on February 24, 2022, Intel joined the global community in condemning Russia’s war against Ukraine and calling for a swift return to peace. During 2022, we ceased 3TG sourcing from smelters and refiners located in Russia. We continue to work with our supply chain to identify and address legacy material sourced from Russian mines.

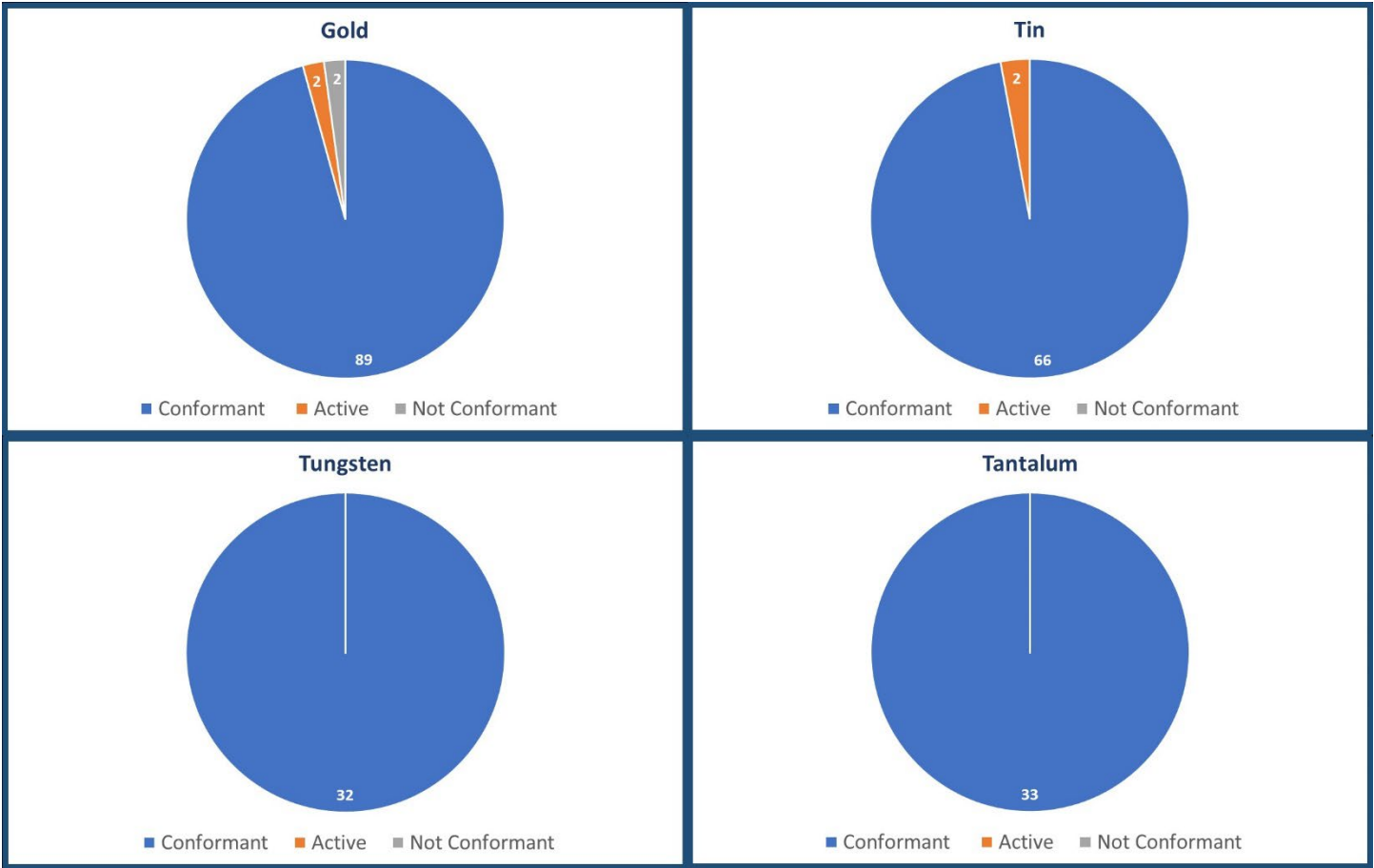
\*\*Covered Countries

### **Summary of Smelter and Refiner Status**

The charts below summarize, by mineral, the numbers of operational smelter and refiner facilities, identified by our Surveyed Suppliers, that as of March 1, 2024:

- are conformant to a responsible mineral assurance program (referred to as “Conformant”),
- have begun participating in a responsible mineral assurance program (referred to as “Active”; as noted above, we have no reason to believe, based on our due diligence, that these facilities process conflict minerals originating from the Covered Countries), or
- are not conformant\* to a responsible mineral assurance program (referred to as “Not Conformant”; as noted above, we have no reason to believe, based on our due diligence, that these facilities process conflict minerals originating from the Covered Countries).

### Status of Identified Smelters and Refiners



\*Included in “Not Conformant” are the 2 refiners that changed status between January 1, 2024, and March 1, 2024

Table 2, below lists the facilities which, to the extent known, processed the necessary conflict minerals in our products based on responses received from our Surveyed Suppliers as of March 1, 2024. Intel conducts no direct transactions and has no contractual relationship with these smelter and refiner facilities nor their sources of ore.

**Table 2**

| <b>Metal</b> | <b>Smelter Name†</b>                                  | <b>Country†</b>          |
|--------------|---|--------------------------|
| Tantalum     | RFH Yancheng Jinye New Material Technology Co., Ltd.* | CHINA                    |
| Tantalum     | PowerX Ltd.*  | RWANDA                   |
| Tantalum     | D Block Metals, LLC*                                  | UNITED STATES OF AMERICA |
| Tantalum     | F&X Electro-Materials Ltd.*                           | CHINA                    |
| Tantalum     | FIR Metals & Resource Ltd.*                           | CHINA                    |
| Tantalum     | Global Advanced Metals Aizu*                          | JAPAN                    |
| Tantalum     | Global Advanced Metals Boyertown*                     | UNITED STATES OF AMERICA |
| Tantalum     | XIMEI RESOURCES (GUANGDONG) LIMITED*                  | CHINA                    |
| Tantalum     | TANIOBIS Co., Ltd.*                                   | THAILAND                 |
| Tantalum     | TANIOBIS GmbH*  | GERMANY                  |

|          |   |                          |
|----------|---|--------------------------|
| Tantalum | Materion Newton Inc.*   | UNITED STATES OF AMERICA |
| Tantalum | TANIOBIS Japan Co., Ltd.*                                     | JAPAN                    |
| Tantalum | TANIOBIS Smelting GmbH & Co. KG*                              | GERMANY                  |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd.*            | CHINA                    |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd.*                 | CHINA                    |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd.*                  | CHINA                    |
| Tantalum | Jiujiang Tanbre Co., Ltd.*                                    | CHINA                    |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd.*                | CHINA                    |
| Tantalum | KEMET de Mexico*  | MEXICO                   |
| Tantalum | AMG Brasil*   | BRAZIL                   |
| Tantalum | Metallurgical Products India Pvt., Ltd.*                      | INDIA                    |
| Tantalum | Mineracao Taboca S.A.*  | BRAZIL                   |
| Tantalum | Mitsui Mining and Smelting Co., Ltd.*                         | JAPAN                    |
| Tantalum | NPM Silmet AS*  | ESTONIA                  |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd.*                   | CHINA                    |
| Tantalum | QuantumClean*   | UNITED STATES OF AMERICA |
| Tantalum | Resind Industria e Comercio Ltda.*                            | BRAZIL                   |
| Tantalum | Yanling Jincheng Tantalum & Niobium Co., Ltd.*                | CHINA                    |
| Tantalum | Taki Chemical Co., Ltd.*                                      | JAPAN                    |
| Tantalum | Telex Metals*   | UNITED STATES OF AMERICA |
| Tantalum | Ulba Metallurgical Plant JSC*                                 | KAZAKHSTAN               |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd.*                | CHINA                    |
| Tantalum | Jiangxi Tuohong New Raw Material*                             | CHINA                    |
| Tin      | PT Bangka Serumpun*   | INDONESIA                |
| Tin      | PT Rajawali Rimba Perkasa*                                    | INDONESIA                |
| Tin      | Luna Smelter, Ltd.*   | RWANDA                   |
| Tin      | Chifeng Dajingzi Tin Industry Co., Ltd.*                      | CHINA                    |
| Tin      | Tin Technology & Refining*                                    | UNITED STATES OF AMERICA |
| Tin      | CRM Synergies*  | SPAIN                    |
| Tin      | PT Mitra Sukses Globalindo*                                   | INDONESIA                |
| Tin      | CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos | BRAZIL                   |
| Tin      | DS Myanmar*   | MYANMAR                  |
| Tin      | PT Putera Sarana Shakti (PT PSS)*                             | INDONESIA                |
| Tin      | Fabrica Auricchio Industria e Comercio Ltda.*                 | BRAZIL                   |
| Tin      | Mining Minerals Resources SARL*                               | CONGO, DEMOCRATIC        |
| Tin      | Alpha*  | UNITED STATES OF AMERICA |
| Tin      | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.*            | CHINA                    |
| Tin      | China Tin Group Co., Ltd.*                                    | CHINA                    |
| Tin      | CV Ayi Jaya*  | INDONESIA                |
| Tin      | PT Premium Tin Indonesia*                                     | INDONESIA                |
| Tin      | PT Rajehan Ariq*  | INDONESIA                |
| Tin      | CV Venus Inti Perkasa*  | INDONESIA                |
| Tin      | Dowa*   | JAPAN                    |
| Tin      | Aurubis Berango*  | SPAIN                    |
| Tin      | EM Vinto*   | BOLIVIA                  |

|     |  |                          |
|-----|--|--------------------------|
| Tin | Estanho de Rondonia S.A.*                      | BRAZIL                   |
| Tin | Fenix Metals*                                  | POLAND                   |
| Tin | Gejiu Non-Ferrous Metal Processing Co., Ltd.*  | CHINA                    |
| Tin | Magnu's Minerai's Metais e Ligas Ltda.*        | BRAZIL                   |
| Tin | Malaysia Smelting Corporation (MSC)*           | MALAYSIA                 |
| Tin | Metallic Resources, Inc.*                      | UNITED STATES OF AMERICA |
| Tin | Aurubis Beerse*                                | BELGIUM                  |
| Tin | Mineracao Taboca S.A.*                         | BRAZIL                   |
| Tin | Minsur*  | PERU                     |
| Tin | Mitsubishi Materials Corporation*              | JAPAN                    |
| Tin | Jiangxi New Nanshan Technology Ltd.*           | CHINA                    |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd.*       | THAILAND                 |
| Tin | O.M. Manufacturing Philippines, Inc.*          | PHILIPPINES              |
| Tin | Operaciones Metalurgicas S.A.*                 | BOLIVIA                  |
| Tin | PT Aries Kencana Sejahtera*                    | INDONESIA                |
| Tin | PT Artha Cipta Langgeng*                       | INDONESIA                |
| Tin | PT ATD Makmur Mandiri Jaya*                    | INDONESIA                |
| Tin | PT Babel Inti Perkasa*                         | INDONESIA                |
| Tin | PT Babel Surya Alam Lestari*                   | INDONESIA                |
| Tin | PT Bangka Prima Tin*                           | INDONESIA                |
| Tin | PT Bukit Timah*                                | INDONESIA                |
| Tin | PT Cipta Persada Mulia*                        | INDONESIA                |
| Tin | PT Mitra Stania Prima*                         | INDONESIA                |
| Tin | PT Timah Nusantara*                            | INDONESIA                |
| Tin | PT Prima Timah Utama*                          | INDONESIA                |
| Tin | PT Refined Bangka Tin*                         | INDONESIA                |
| Tin | PT Sariwiguna Binasentosa*                     | INDONESIA                |
| Tin | PT Stanindo Inti Perkasa*                      | INDONESIA                |
| Tin | PT Sukses Inti Makmur (SIM)*                   | INDONESIA                |
| Tin | PT Timah Tbk Kundur*                           | INDONESIA                |
| Tin | PT Timah Tbk Mentok*                           | INDONESIA                |
| Tin | PT Tommy Utama*                                | INDONESIA                |
| Tin | Resind Industria e Comercio Ltda.*             | BRAZIL                   |
| Tin | Rui Da Hung*                                   | TAIWAN                   |
| Tin | Super Ligas*                                   | BRAZIL                   |
| Tin | Thaisarco*                                     | THAILAND                 |
| Tin | White Solder Metalurgia e Mineracao Ltda.*     | BRAZIL                   |
| Tin | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.* | CHINA                    |
| Tin | Tin Smelting Branch of Yunnan Tin Co., Ltd.*   | CHINA                    |
| Tin | PT Menara Cipta Mulia*                         | INDONESIA                |
| Tin | HuiChang Hill Tin Industry Co., Ltd.*          | CHINA                    |
| Tin | Guangdong Hanhe Non-Ferrous Metal Co., Ltd.*   | CHINA                    |
| Tin | Precious Minerals and Smelting Limited**       | INDIA                    |
| Tin | Yunnan Yunfan Non-ferrous Metals Co., Ltd.*    | CHINA                    |
| Tin | PT Belitung Industri Sejahtera**               | INDONESIA                |

|      |  |                          |
|------|--|--------------------------|
| Tin  | PT Tinindo Inter Nusa*   | INDONESIA                |
| Gold | NH Recytech Company*   | SOUTH KOREA              |
| Gold | Metal Concentrators SA (Pty) Ltd.*                               | SOUTH AFRICA             |
| Gold | Eco-System Recycling Co., Ltd. West Plant*                       | JAPAN                    |
| Gold | Eco-System Recycling Co., Ltd. North Plant*                      | JAPAN                    |
| Gold | Gold by Gold Colombia*   | COLOMBIA                 |
| Gold | Coimpa Industrial LTDA*  | BRAZIL                   |
| Gold | Abington Reldan Metals, LLC*                                     | UNITED STATES OF AMERICA |
| Gold | Aida Chemical Industries Co., Ltd.*                              | JAPAN                    |
| Gold | Agosi AG*  | GERMANY                  |
| Gold | Almalyk Mining and Metallurgical Complex (AMMC)*                 | UZBEKISTAN               |
| Gold | AngloGold Ashanti Corrego do Sitio Mineracao*                    | BRAZIL                   |
| Gold | Argor-Heraeus S.A.*  | SWITZERLAND              |
| Gold | Asahi Pretec Corp.*  | JAPAN                    |
| Gold | Asahi Refining Canada Ltd.*                                      | CANADA                   |
| Gold | Asahi Refining USA Inc.*   | UNITED STATES OF AMERICA |
| Gold | Asaka Riken Co., Ltd.*   | JAPAN                    |
| Gold | Aurubis AG*  | GERMANY                  |
| Gold | Bangko Sentral ng Pilipinas (Central Bank of the Philippines)*   | PHILIPPINES              |
| Gold | Boliden Ronnskar*  | SWEDEN                   |
| Gold | C. Hafner GmbH + Co. KG*   | GERMANY                  |
| Gold | CCR Refinery - Glencore Canada Corporation*                      | CANADA                   |
| Gold | Chimet S.p.A.*   | ITALY                    |
| Gold | Chugai Mining*   | JAPAN                    |
| Gold | DSC (Do Sung Corporation)*                                       | SOUTH KOREA              |
| Gold | Dowa*  | JAPAN                    |
| Gold | Eco-System Recycling Co., Ltd. East Plant*                       | JAPAN                    |
| Gold | LT Metal Ltd.*   | SOUTH KOREA              |
| Gold | Heimerle + Meule GmbH*   | GERMANY                  |
| Gold | Heraeus Metals Hong Kong Ltd.*                                   | CHINA                    |
| Gold | Heraeus Germany GmbH Co. KG*                                     | GERMANY                  |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.* | CHINA                    |
| Gold | Ishifuku Metal Industry Co., Ltd.*                               | JAPAN                    |
| Gold | Istanbul Gold Refinery*  | TURKEY                   |
| Gold | Italpreziosi*  | ITALY                    |
| Gold | Japan Mint*  | JAPAN                    |
| Gold | Jiangxi Copper Co., Ltd.*  | CHINA                    |
| Gold | JX Nippon Mining & Metals Co., Ltd.*                             | JAPAN                    |
| Gold | Kazzinc*   | KAZAKHSTAN               |
| Gold | Kennecott Utah Copper LLC*                                       | UNITED STATES OF AMERICA |
| Gold | KGHM Polska Miedz Spolka Akcyjna*                                | POLAND                   |
| Gold | Kojima Chemicals Co., Ltd.*                                      | JAPAN                    |
| Gold | Korea Zinc Co., Ltd.*  | SOUTH KOREA              |
| Gold | L'Orfebre S.A.*  | ANDORRA                  |

|      |  |                          |
|------|--|--------------------------|
| Gold | LS MnM Inc.*   | SOUTH KOREA              |
| Gold | Materion*  | UNITED STATES OF AMERICA |
| Gold | Metalurgica Met-Mex Penoles S.A. De C.V.*                    | MEXICO                   |
| Gold | Mitsubishi Materials Corporation*                            | JAPAN                    |
| Gold | Mitsui Mining and Smelting Co., Ltd.*                        | JAPAN                    |
| Gold | MMTC-PAMP India Pvt., Ltd.*                                  | INDIA                    |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.S.*                      | TURKEY                   |
| Gold | Navoi Mining and Metallurgical Combinat*                     | UZBEKISTAN               |
| Gold | Nihon Material Co., Ltd.*                                    | JAPAN                    |
| Gold | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH* | AUSTRIA                  |
| Gold | Ohura Precious Metal Industry Co., Ltd.*                     | JAPAN                    |
| Gold | MKS PAMP SA*   | SWITZERLAND              |
| Gold | PT Aneka Tambang (Persero) Tbk*                              | INDONESIA                |
| Gold | PX Precinox S.A.*  | SWITZERLAND              |
| Gold | Rand Refinery (Pty) Ltd.*                                    | SOUTH AFRICA             |
| Gold | REMONDIS PMR B.V.*   | NETHERLANDS              |
| Gold | Royal Canadian Mint*   | CANADA                   |
| Gold | SAFINA A.S.*   | CZECHIA                  |
| Gold | SEMPSA Joyeria Plateria S.A.*                                | SPAIN                    |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.*           | CHINA                    |
| Gold | Sichuan Tianze Precious Metals Co., Ltd.*                    | CHINA                    |
| Gold | Solar Applied Materials Technology Corp.*                    | TAIWAN                   |
| Gold | Sumitomo Metal Mining Co., Ltd.*                             | JAPAN                    |
| Gold | T.C.A S.p.A*   | ITALY                    |
| Gold | Tanaka Kikinzoku Kogyo K.K.*                                 | JAPAN                    |
| Gold | Tokuriki Honten Co., Ltd.*                                   | JAPAN                    |
| Gold | TOO Tau-Ken-Altyn*   | KAZAKHSTAN               |
| Gold | Torecom*   | SOUTH KOREA              |
| Gold | Umicore S.A. Business Unit Precious Metals Refining*         | BELGIUM                  |
| Gold | United Precious Metal Refining, Inc.*                        | UNITED STATES OF AMERICA |
| Gold | Valcambi S.A.*   | SWITZERLAND              |
| Gold | Western Australian Mint (T/a The Perth Mint)*                | AUSTRALIA                |
| Gold | WIELAND Edelmetalle GmbH*                                    | GERMANY                  |
| Gold | Yamakin Co., Ltd.*   | JAPAN                    |
| Gold | Yokohama Metal Co., Ltd.*                                    | JAPAN                    |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation*         | CHINA                    |
| Gold | SungEel HiMetal Co., Ltd.*                                   | SOUTH KOREA              |
| Gold | Planta Recuperadora de Metales SpA*                          | CHILE                    |
| Gold | Advanced Chemical Company**                                  | UNITED STATES OF AMERICA |
| Gold | Shandong Gold Smelting Co., Ltd.*                            | CHINA                    |
| Gold | Gold Refinery of Zijin Mining Group Co., Ltd.*               | CHINA                    |
| Gold | Bangalore Refinery**   | INDIA                    |
| Gold | Augmont Enterprises Private Limited                          | INDIA                    |
| Gold | GGC Gujrat Gold Centre Pvt. Ltd.                             | INDIA                    |

|          |  |                          |
|----------|--|--------------------------|
| Tungsten | Lianyou Metals Co., Ltd.*                                      | TAIWAN                   |
| Tungsten | Hubei Green Tungsten Co., Ltd.*                                | CHINA                    |
| Tungsten | Cronimet Brasil Ltda*  | BRAZIL                   |
| Tungsten | Fujian Xinlu Tungsten Co., Ltd.*                               | CHINA                    |
| Tungsten | Tungsten Vietnam Joint Stock Company*                          | VIET NAM                 |
| Tungsten | A.L.M.T. Corp.*  | JAPAN                    |
| Tungsten | Asia Tungsten Products Vietnam Ltd.*                           | VIET NAM                 |
| Tungsten | Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten | CHINA                    |
| Tungsten | China Molybdenum Tungsten Co., Ltd.*                           | CHINA                    |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd.*                          | CHINA                    |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd.*                       | CHINA                    |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd.*                            | CHINA                    |
| Tungsten | Global Tungsten & Powders LLC*                                 | UNITED STATES OF AMERICA |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd.*                          | CHINA                    |
| Tungsten | H.C. Starck Tungsten GmbH*                                     | GERMANY                  |
| Tungsten | TANIOBIS Smelting GmbH & Co. KG*                               | GERMANY                  |
| Tungsten | Hunan Chenzhou Mining Co., Ltd.*                               | CHINA                    |
| Tungsten | Japan New Metals Co., Ltd.*                                    | JAPAN                    |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd.*               | CHINA                    |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd.*                            | CHINA                    |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.* | CHINA                    |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd.*                  | CHINA                    |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd.*                           | CHINA                    |
| Tungsten | Kennametal Fallon*   | UNITED STATES OF AMERICA |
| Tungsten | Kennametal Huntsville*   | UNITED STATES OF AMERICA |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd.*                               | CHINA                    |
| Tungsten | Niagara Refining LLC*  | UNITED STATES OF AMERICA |
| Tungsten | Masan High-Tech Materials*                                     | VIET NAM                 |
| Tungsten | Wolfram Bergbau und Hutten AG*                                 | AUSTRIA                  |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd.*                              | CHINA                    |
| Tungsten | Xiamen Tungsten Co., Ltd.*                                     | CHINA                    |
| Tungsten | Philippine Chuangxin Industrial Co., Inc.*                     | PHILIPPINES              |

† Smelter and refiner facility names and locations as reported by RMI as of March 1, 2024.

\* Denotes smelters and refiners which are conformant to a responsible mineral assurance program as of March 1, 2024.

\*\* Denotes smelters and refiners which are participating in a responsible mineral assurance program as of March 1, 2024.

## Conclusion and Future Due Diligence Measures

The facilities reported in Table 2 processed the necessary conflict minerals in our products based on responses received from our Surveyed Suppliers as of March 1, 2024. As of March 1, 2024, 99% of the reported smelter and refiner facilities are conformant or are participating in a responsible mineral assurance program. All smelters and refiners that we know or have reason to believe may source conflict minerals from the Covered Countries and that may not be solely from recycled or scrap sources were conformant to a responsible mineral assurance program as of March 1, 2024. We have no reason

to believe that any of the reported smelter and refiner facilities directly or indirectly finance or benefit armed groups in the Covered Countries. We are continuing to engage in the activities described above in “Design of Responsible Minerals Program,” and we are continuing to follow up with suppliers that are not meeting our requirements, as well as contacting smelters and refiners that are not yet conformant to a responsible mineral assurance program. We are encouraging and assisting such smelters and refiners to become conformant to a responsible mineral assurance program, thus supporting our efforts to build ethical and socially responsible supply chains for our company.

Our efforts to determine the mine or location of origin of the necessary conflict minerals in all our products with the greatest possible specificity consisted of the due diligence measures described in this Report. In particular, we relied on the information made available by responsible mineral assurance programs for the smelters and refiners in our supply chain because such programs review and audit whether sufficient evidence exists regarding the mine and/or location of origin of the conflict minerals that the audited smelter and refiner facilities have processed. We also sought source and chain of custody information directly from smelters and refiners and from publicly available sources and, if we determined such information to be reliable, we used the information to make reasonable conclusions on the source and chain of custody of the conflict minerals processed by facilities that were not conformant to or participating in a responsible mineral assurance program

### **Efforts Pertaining to Cobalt**

Intel continues to evaluate and expand upon the framework of our due diligence programs as material use and risk profiles emerge. Cobalt has been identified as a mineral of concern due to reports of child labor and other social impacts in CAHRAs. Aligned with our approach to conflict minerals, our desire is not to eliminate sourcing from CAHRAs, but rather to identify and mitigate risks in our supply chain to obtain only minerals that are sourced responsibly.

In 2023, Intel conducted a supply chain survey of 60 suppliers that we determined may contribute intentionally added cobalt to our products using the Extended Minerals Reporting Template (EMRT), a supply chain survey designed by RMI to identify the smelters and refiners that process the necessary cobalt contained in our products and the associated country of origin. All 60 suppliers responded with a completed EMRT. We are using the information obtained to conduct due diligence on the identified smelters and refiners and actively focus our outreach efforts to encourage RMAP involvement. Participation in a program such as RMAP verifies these facilities have management systems in place to ensure the cobalt they process is responsibly sourced in alignment with OECD Guidance. We conducted virtual outreach to smelters and refiners not yet participating in RMAP and worked with direct suppliers to facilitate alternative sourcing where appropriate.

As of March 1, 2024, we have identified 73 cobalt smelters and refiners reported by Surveyed Suppliers in our supply chain. Of those 73 smelters and refiners, 48 (66%) are either conformant or have begun participating in a responsible mineral assurance program. We continue to conduct outreach to encourage participation of the remaining 25 smelters and refiners.

Intel strongly believes that collaboration among industry, government, NGOs, and civil society experts is the best way to effectively create positive change in our supply chain. Intel is participating in developing industry-wide standards to better align, and thus strengthen, the collective approach to responsible cobalt sourcing. This is demonstrated by our previous collaboration with RMI to establish industry standards regarding responsible cobalt sourcing, including the EMRT and the RMAP Cobalt Due Diligence Standard. Intel has continued its cobalt efforts co-leading RMI’s Emerging Minerals Working Group, where we are responsible for helping set strategy and organizing outreach to crude cobalt refiners, which are primarily located in the DRC. Intel recognizes the local socio-economic importance of the ASM sector in CAHRAs and seeks to assist ASM sites in meeting downstream compliance requirements through our contributions to the Better Mining ASM Mine Monitoring Program in partnership with RMI and RCS Global. These efforts further our pursuit of responsibly sourced cobalt in our products.

On our website at [www.intel.com/responsibleminerals](http://www.intel.com/responsibleminerals), we regularly update our EMRT, which contains a smelter and refiner list that includes the facilities that, to the extent known, may have processed the cobalt in our products based on responses received from our Surveyed Suppliers.

### **Intel RISE Responsible Minerals Sourcing Initiative**

In May of 2020, we announced Intel's corporate RISE Strategy to create a more responsible, inclusive, and sustainable world, enabled through technology and our collective actions. As a key technology industry initiative within our RISE goals, Intel committed, by 2030, to significantly broaden our impact in responsible minerals and accelerate the creation of sourcing standards for a much wider set of minerals across CAHRAs globally.

In 2023, we sent RMI's newly released Pilot Reporting Template (PRT) to identify sourcing of aluminum, copper, nickel and zinc to suppliers who contribute these materials to our Intel manufactured microprocessors. This is an important step in our RISE strategy as we work to map our supply chains for our highest priority minerals. Although sourcing of these minerals is not yet widely reported, we received a response from 90% of surveyed suppliers. We are continuing to pursue information on smelters and refiners in our extended supply chain. To contribute to standards and help define and engage in due diligence within the copper supply chain, Intel is an active partner member of The Copper Mark. We also participate in the RMI MRT Working Group and were a key driver of RMI releasing the PRT, which provides an industry standard template for additional minerals reporting. We expect our next steps to include work with our suppliers to continue mapping our supply chain for the targeted minerals, as well as other priority minerals such as silicon and battery materials. Additionally, we continue to partner with industry associations to put standards in place to enable our ultimate goal of responsible sourcing for all the minerals in our supply chain. We intend to continue to identify the highest priority minerals in pursuit of our 2030 RISE Goals.

Intel's mission for the future is to maintain the positive progress we have made on 3TG and cobalt to date, and to proactively address emerging risks from the expanding scope of materials and geographies. Our ambition is to apply our learning from the past decade and to work with our industry to broaden and accelerate the creation of sourcing standards for a much wider set of minerals globally.

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*Other names and brands may be claimed as the property of others. The "Efforts Pertaining to Cobalt", and "Intel RISE Responsible Minerals Sourcing Initiative" sections are not required by the Rule and are furnished as a supplement to this Report.*



## CONFLICT MINERALS REPORT

For the Reporting Period from January 1 to December 31, 2022

### Introduction

This is the Conflict Minerals Report of Avnet, Inc. for the calendar year 2022 (“Report”), which has been filed as an exhibit to the Company’s Form SD as provided for in Rule 13p-1 of the Securities Exchange Act of 1934 (the “Conflict Minerals Rule”) and is posted on the Company’s website at <https://www.avnet.com/wps/portal/us/about-avnet/human-rights/conflict-minerals>. Information contained on, or accessible through, the Company’s website is neither part of nor incorporated by reference into this Report. The date of filing of this Report is May 24, 2023.

References in this Report to “the Company,” “Avnet,” “we,” “our,” or “us” means Avnet, Inc. together with its subsidiaries, except where the context otherwise requires.

### Applicability of the Conflict Minerals Rule to Avnet

Avnet is a global technology distributor and solutions provider that supports customers at every stage of the product lifecycle, from idea to design and from prototype to production. Its position at the center of the technology value chain enables it to accelerate the design and supply stages of product development so customers can realize revenue faster. A core part of Avnet’s business is as a global distributor of electronic components. It markets, sells and distributes electronic components from the world’s leading electronic component manufacturers, including semiconductors, IP&E components (interconnect, passive and electromechanical), and other integrated and embedded components; and distributes a comprehensive portfolio of kits, tools, industrial automation components, and test and measurement products. It also provides embedded solutions, such as technical design, integration and assembly of embedded products, systems, and solutions; provides integrated solutions for embedded display solutions, such as touch and passive displays; and develops and produces standard board, industrial subsystems, and application-specific devices.

The Conflict Minerals Rule requires that the Company disclose in an annual Form SD and associated Conflict Minerals Report information regarding any conflict minerals that are “necessary to the functionality or production” of any product that it manufactures or contracts to be manufactured. The Securities and Exchange Commission (“SEC”) defines conflict minerals as columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives, which are limited to tantalum, tin, and tungsten (collectively, “CMs”). The Democratic Republic of Congo and its adjoining countries have extensive reserves of CMs, some of which are illegally sourced and traded by armed groups who are responsible for significant human rights violations. The purpose of the Conflict Minerals Rule is to encourage companies whose products contain CMs to endeavor to source from suppliers who do not directly or indirectly support such armed groups through their purchasing decisions. The term CM refers to the named minerals and their derivatives, and does not infer that the procurement of such minerals or derivatives directly or indirectly financed or benefitted armed groups in the Democratic Republic of Congo or an adjoining country. CMs are used in many electronic components and computer products.

Avnet’s revenues for 2022 were largely from distribution and services that were not in-scope for purposes of compliance with the Conflict Minerals Rule. However, it manufactured or contracted to manufacture certain products in which CMs were necessary to the functionality or production of those products during 2022 (collectively, “Covered Products”). Therefore, the Company conducted a reasonable country of origin inquiry (“RCOI”), in good faith, to determine whether any of the CMs in the Covered Products: (1) originated in the Democratic Republic of Congo or an adjoining country, including Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia (collectively, the “Covered Countries”); or (2) are from recycled or scrap sources. Please see “Conflict Minerals Program – Reasonable Country of Origin Inquiry” for more information on the RCOI.

The Company conducted further due diligence on the source and chain of custody of such CMs that conformed, in all material respects, to an internationally recognized due diligence framework as required by the Conflict Minerals Rule. Please see “Conflict Minerals Program – Design of Conflict Minerals Program” for more information on the design of the due diligence program and “Conflict Minerals Program – Due Diligence Efforts” for more information on the due diligence conducted.

Avnet is a downstream consumer of CMs. It does not purchase the necessary CMs contained in its Covered Products directly from mines, smelters or refiners and is generally many levels removed from such market participants. Through the efforts described in this Report, Avnet seeks to ensure that its sourcing practices are consistent with its Responsible Minerals Sourcing Policy and to encourage conflict free sourcing in its supply chain.

### **Responsible Minerals Sourcing Policy**

Avnet is committed to responsible sourcing of CMs and promotes traceability of CMs and transparency of its global supply chain. It supports the efforts of the Responsible Business Alliance’s (“RBA”) due diligence and reporting processes that seek to ensure supply chain transparency, including through its engagement of Assent, a third-party service provider which is a member of RBA’s Responsible Minerals Initiative (“RMI”). In addition, the Company has actively engaged with its customers and suppliers for several years with respect to the use of CMs, and has adopted a Responsible Minerals Sourcing Policy, which has been communicated to Avnet’s suppliers and the public. The Responsible Minerals Sourcing Policy is below:

Avnet, Inc., including its subsidiaries (collectively “Avnet”), is committed to source minerals responsibly and avoid sourcing minerals that contribute to armed conflict or human rights abuses in conflict affected and high-risk areas (CAHRAs), including the Democratic Republic of Congo (DRC) or adjoining countries. Avnet’s approach is to promote the traceability and transparency of supply chains and move towards a conflict-free global supply chain.

Avnet supports the aims of the Responsible Business Alliance’s Responsible Minerals Initiative (RMI) to identify, reduce and eventually eliminate the use of conflict minerals that finance or benefit conflict or human rights violations, and the Responsible Minerals Assurance Process (RMAP) to validate responsible sources. Avnet encourages its suppliers to likewise support such efforts. “Conflict minerals” include tantalum, tin, tungsten and gold, which are used in many electronic components and computer products.

Under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and the U.S. Securities and Exchange Commission (“SEC”) rules, Avnet is required to annually report on Form SD whether products it manufactures or contracts to manufacture contain conflict minerals necessary to the functionality or production of the products, which have been sourced from mines in the DRC or adjoining countries (“covered products”). Revenue from the mining and trade of conflict minerals from the DRC or adjoining countries is believed to finance or benefit armed groups that are responsible for human rights violations.

Avnet is a global technology distributor and solutions provider. To a very limited extent Avnet manufactures or contracts to manufacture products, some of which are covered products. However, Avnet is a downstream consumer of conflict minerals. It does not purchase directly from mines, smelters or refiners and is many levels removed from such market participants. Avnet endeavors to avoid purchasing products containing conflict minerals sourced from CAHRAs that directly or indirectly finance or benefit armed groups, while minimizing unintended consequences of de facto embargoes for conflict-free mines. Avnet also expects its suppliers to source minerals only from responsible sources.

Avnet annually conducts a reasonable country of origin inquiry (RCOI) and due diligence that aligns with 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* (OECD Framework). As a downstream consumer, Avnet expects its suppliers to provide proper verification of the country of origin and source of the conflict minerals used in the products they supply to Avnet, utilizing the most current Conflict Minerals Reporting Template (CMRT) developed by RMI. Avnet also encourages its suppliers to adopt similar policies, due diligence frameworks, and management systems with respect to responsible minerals sourcing to drive those efforts throughout their supply chain.

The Responsible Minerals Sourcing Policy is available on the Company’s website at <https://www.avnet.com/wps/portal/us/about-avnet/human-rights/conflict-minerals>.

## **Conflict Minerals Program**

### **Design of Conflict Minerals Program**

Avnet’s 2022 Conflict Minerals Program (“2022 Program”) utilized the internationally recognized framework *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* and the related supplements for gold, tin, tantalum, and tungsten (“OECD Framework”) to develop its process to identify the country of origin and chain of custody of the CMs.

As Avnet does not purchase CMs directly from any mine, refiner or smelter, its supply chain with respect to the CMs in its Covered Products is highly complex and there are many parties in the supply chain between Avnet’s direct supplier and the mine from which the CM originated. Due to the Company’s “downstream” position in the supply chain, it followed the principles outlined in the OECD Framework for downstream companies with no direct relationships to smelters or refiners. Therefore, Avnet must rely, in good faith, on its direct suppliers to provide it with information regarding the country of origin and chain of custody of the CMs included in the Covered Products and on third-party audit programs. It is likely that years of engagement and propagation of expectations through many tiers of the supply chain will be necessary before information returned to downstream companies, such as Avnet, may be considered accurate and complete.

### **Covered Products**

Avnet determined that the following products it manufactured or contracted to manufacture in 2022 contained CMs necessary to the functionality or production of those products, which are referred to as the Covered Products:

- Electromechanical solutions manufactured or contracted to be manufactured by DEM Manufacturing.
- Test tools for development engineers incorporating wireless charging functionality using the Wireless Power Consortium “Qi” technology contracted to be manufactured for AVID.
- Semi-conductor electronic devices designed and contracted to be manufactured by Avnet per customer specifications.
- Electronic boards, electronic devices, display solutions, and Human-Machine Interface (HMI) solutions manufactured or contracted to be manufactured by Avnet Embedded GmbH.
- Control boards and HMIs contracted to be manufactured.
- Server based products integrated from customer designed and/or off-the-shelf components by Avnet Integrated.
- Design kits and modules manufactured or contracted to be manufactured by Avnet.
- Development boards manufactured or contracted to be manufactured by EBV Elektronik.
- Development boards and accessories contracted to be manufactured by Avnet.
- Printed circuit board assembly (PCBA) designed by customer and contracted to be manufactured by Farnell.
- PCBA and high-level integration of customer products.
- Avnet Guardian products manufactured or contracted to be manufactured by Avnet.
- Cables and electromechanical assembled products manufactured or contracted to be manufactured by Avnet.

Covered Products do not include products that were not entered into the stream of commerce in 2022, and do not include products manufactured or contracted to be manufactured by entities acquired by Avnet after April 2022, as provided by the Conflict Minerals Rule.

### **Reasonable Country of Origin Inquiry**

Pursuant to the Conflict Minerals Rule, Avnet conducted a RCOI on the source and chain of custody of the CMs in its Covered Products, to determine whether any of the necessary CMs in its Covered Products originated in any of the Covered Countries and may not have come from recycled or scrap sources. To the extent applicable, Avnet conducted its RCOI utilizing the same processes and procedures that it established for conducting its due diligence, in particular Steps 1 and 2 of the OECD Framework, which are described under “Due Diligence Efforts” below.

The 2022 RCOI included 429 suppliers (“Suppliers”) that Avnet identified as possibly providing it with components, parts or products that contained the necessary CMs for its Covered Products. These Suppliers identified smelters and refiners that may have processed the necessary CMs contained in the Covered Products. Such smelters and refiners were compared against the Smelter Look-up tab of the Conflict Minerals Reporting Template (“CMRT”) and the list of “conformant” smelters and refiners and country of origin information published by the RBA’s Responsible Minerals Initiative (“RMI”) to validate the smelters and refiners, which validated facilities are listed in [Appendix A](#), and to determine the countries from where such validated facilities may have obtained CMs, which countries are listed in [Appendix B](#). For this process, Avnet utilized the data its Suppliers provided on their CMRTs version 6.2 or higher along with RMI’s due diligence of smelters and refiners and audits under the Responsible Minerals Assurance Process (“RMAP”) standard. The RMAP uses an independent third-party audit of smelter and refiner management systems and sourcing practices to validate conformance with RMAP protocols and current global standards.

The Company retained Assent (formerly known as Assent Compliance, “Assent”), a third-party service provider, to assist in the collection and review of Supplier CMRTs and the identification of risks in the supply chain. During the 2022 RCOI, Avnet contacted Suppliers via the Assent Compliance Manager (“ACM”), a software-as-a-service platform that enables users to manage and track supplier communications and allows suppliers to upload completed CMRTs directly to the platform for validation, assessment and management. ACM provides functionality that meets the OECD Framework process expectations by evaluating the quality of each Supplier’s response and assigning a health score based on the Supplier’s declaration of process engagement. Additionally, the results provided in this Report, as well as the step-by-step process for Supplier engagement and upstream due diligence investigations performed, are managed through ACM.

Avnet requested that all Suppliers complete a CMRT. On behalf of Avnet, Assent offered training and educational resources to Suppliers to guide them on best practices, completion of a CMRT and the use of the ACM platform. Avnet monitored and tracked all communications in ACM for future reporting and transparency. If a Supplier remained unresponsive after three requests through ACM, Avnet may directly follow-up with such Supplier.

Supplier CMRTs are subjected to an automated data validation process, with the goal to increase the completeness and accuracy of submissions and identify any contradictory answers in a CMRT. This data validation process is based on questions within the declaration tab of the CMRT, which helps to identify areas that require further classification or risk assessment as well as to understand the due diligence efforts of the Suppliers. Data validation contributes to the health assessment of Avnet’s Conflict Minerals Program, and the results are shared with Suppliers regarding areas that require clarification or improvement.

Submitted Supplier CMRTs are accepted and classified as either valid or invalid. If a Supplier’s CMRT is classified as invalid, the Supplier is provided feedback and guidance on how to correct the validation errors and requested to re-submit a valid CMRT. In addition, Suppliers are provided training courses and direct engagement help through Assent’s multilingual Supplier Experience team.

### **Due Diligence Efforts**

Based on the findings of the 2022 RCOI, pursuant to the Conflict Minerals Rule, Avnet conducted further due diligence on the source and chain of custody of the CMs in its Covered Products. The Company designed its due diligence measures to conform, in all material respects, with the OECD Framework, which contains a five-step structure for due diligence as a basis for responsible global supply chain management of CMs from conflict-affected and high-risk areas.

#### **1. Establish strong company management systems**

- Avnet has a governance team and a working team to carry out its Conflict Minerals Program. The governance team is made up of senior management and is responsible for ensuring that the program meets regulatory requirements and enterprise goals and provides direction to the working team. The working team is responsible for the day-to-day implementation of the program, diligence efforts and risk mitigation strategy and informs the governance team about the results of the due diligence and risk mitigation efforts.

- Avnet uses a third-party service provider, Assent, to assist with collecting and evaluating supply chain information, identifying potential risks and developing additional due diligence steps. Please see “Conflict Minerals Program – Reasonable Country of Origin Inquiry” for more information on the use of Assent and its software platform ACM. Avnet also leverages Assent’s managed services to work with dedicated program specialists who support Avnet’s CM program and provide Avnet updates on program status.
- Avnet has a Responsible Minerals Sourcing Policy, as discussed earlier in this Report. Pursuant to this policy, Avnet expects its Suppliers to source CMs only from responsible sources and to provide proper verification of the country of origin and source of the materials used in the products they supply to Avnet. Suppliers either receive a copy of the policy or are notified of this policy. In addition, the policy is posted on Avnet’s website. This policy is reviewed annually by the governance team.
- Avnet’s Global Supplier Quality Handbook further discloses its expectations for suppliers, including an expectation that suppliers only source materials from environmentally and socially responsible suppliers.
- Avnet seeks to include CM related provisions in new or amended supplier agreements with respect to the Covered Products. Its current form of supplier agreement contains a CM provision that requires a Supplier to warrant that any products it supplies containing CMs either does not finance or benefit armed groups in the Covered Countries or are from recycled or scrap sources.
- Avnet uses the current CMRT version developed by RMI to identify smelters and refiners in its supply chain. The CMRT requires Suppliers to provide information concerning the usage and source of CMs in their components, parts and products, as well as information concerning their related compliance efforts, including whether they have a policy on conflict-free sourcing and require their own suppliers to source CMs from responsible sources.
- By using Assent, Avnet provides its Suppliers access to a free platform to upload their CMRTs, help desk support, educational resources on how to properly complete and submit a CMRT, and other multilingual resources.
- Employees, vendors, suppliers, customers and any third-party can confidentially report concerns regarding Avnet’s business operations, including compliance with the Responsible Minerals Sourcing Policy, through the Ethics Alertline, via phone or internet. Violations or grievances at the industry level can be reported to the RMI directly at <http://responsiblemineralsinitiative.org/responsible-minerals-assurance-process/grievance-mechanism/>.
- Avnet has a document retention policy to retain CM related documents, including supplier responses to CMRTs and the sources identified within each reporting period, for at least five years.

## 2.□□□□ Identify and assess risk in the supply chain

- Avnet identifies the business segments that manufacture or contract to manufacture products reasonably believed to contain CMs and determine the Covered Products subject to the Conflict Minerals Rule. As a global value-added distributor, a significant percentage of Avnet’s operations are out of scope of the Conflict Minerals Rule.
- Avnet identifies the active suppliers of materials, components, parts, and products that may contain CMs for the Covered Products, and each Supplier is requested to complete the then latest revision of the CMRT. Avnet expects its direct Suppliers to survey their suppliers.

- Supplier level risks include non-responsive Suppliers. Avnet tracks receipt of Supplier CMRTs, and if a Supplier remains unresponsive after three requests through the ACM platform, Avnet may directly follow-up with such Supplier. Follow-up with non-responsive Suppliers continued into 2023.
- Supplier level risks include incomplete or invalid submitted CMRTs. Submitted CMRTs go through a data validation process to evaluate responses for plausibility, completion, and consistency to lower the risks associated with Supplier CMRT content. To the extent that a CMRT is incomplete, invalid, or other relevant information is not provided by a Supplier, follow-up procedures are undertaken to request compliance and to offer feedback, guidance and educational resources. Follow-up with such Suppliers continued into 2023.
- Supplier level risks include weak or undeveloped Supplier CM programs. Based on a Supplier’s submitted CMRT, the strength of a Supplier’s related compliance efforts, including whether it has a conflict minerals sourcing policy or implements due diligence measures for conflict free sourcing, is evaluated, tracked and rated as either weak or strong.
- Supplier level risks include Supplier CMRTs that are based on company-level information versus Covered Product-level information. Suppliers may have been over-inclusive if their suppliers provide information on a company-level basis and under-inclusive if Suppliers experience non-responsive suppliers or incomplete supplier CMRTs. Therefore, the Company is unable to determine if the smelters and refiners listed in Appendix A were all utilized or is a complete list of smelters and refiners utilized for CMs in the Covered Products.
- Supplier level risks include suppliers with problematic smelters and refiners in its supply chain. The CMRT data validation process evaluates responses for predetermined red flag indicators defined in the OECD Framework to identify risks in the supply chain posed by smelters and refiners.
  - Smelters and refiners identified in the CMRTs are compared against the Smelter Look-up tab of the CMRT and the list of Conformant smelters and refiners and country of origin information published by the RMI to determine if the smelter had been audited against a standard in conformance with the OECD Framework, such as RMAP.
  - If a smelter’s due diligence practices have not been audited against the RMAP standard or the smelter is considered non-conformant by RMAP, follow-ups may be conducted with Suppliers reporting those facilities and the facilities are assessed for potential sourcing risks.
  - The process uses multiple factors to determine the level of risk that each smelter and refiner poses to the supply chain. Factors include: RMAP audit status, geographic proximity to Conflict-Affected and High Risk Areas, known mineral source country of origin, credible evidence of unethical or conflict sourcing, peer assessments conducted by credible third-party sources, and sanction risks.

### 3.□□□□□**Design and implementation of a strategy to respond to identified risks**

- Avnet has a risk management plan through which the Conflict Minerals Program is implemented, managed, and monitored. The plan includes processes to assess and respond to the risks identified in the supply chain, which are described in more detail under “Due Diligence Efforts – 2. Identify and assess risk in the supply chain.” Feedback on Supplier CMRTs is given directly to Suppliers and educational resources are provided to assist Suppliers in corrective action methods or to improve their internal programs.
- Avnet works with Suppliers on an as-needed basis to assist them with understanding the requirements of the Conflict Minerals Rule. Avnet also offers, through Assent, training and educational resources to Suppliers to guide them on best practices, completion of a CMRT and the use of the ACM platform.
- Avnet participates in Assent’s smelter outreach initiative, where letters are sent twice a year to each smelter and refiner not conformant or not enrolled in RMAP to encourage participation in a cross-recognized industry audit program. The initiative also includes letters to smelters and refiners who are conformant to RMAP to reflect appreciation for their efforts.

- Working team leaders monitor risks and share the CM Program results, risk assessments, and draft Form SD filings with the governance team to ensure transparency within Avnet.
- Avnet’s Responsible Minerals Sourcing Policy publicly announces its expectations that Suppliers participate in Avnet’s due diligence process by providing proper verification of the country of origin and source of the materials used in the Covered Products they supply to Avnet. The policy and the Global Supplier Quality Handbook also state that Suppliers are expected to source CMs only from responsible sources.
- Avnet seeks to include CM related provisions in new or amended supplier agreements with respect to the Covered Products and include CM related due diligence in acquisition activities.
- Avnet has processes in place for new product introductions and changes to the bill of materials for the Covered Products to help ensure compliance with the Conflict Minerals Program.
- Employees, vendors, suppliers, customers and any third-party can confidentially report concerns regarding Avnet’s business operations, including compliance with the Responsible Minerals Sourcing Policy, through the Ethics Alertline, via phone or internet.

#### 4. Carry out independent third-party audit of supply chain due diligence

- As Avnet is a downstream consumer of CMs and is generally many steps removed from smelters and refiners which provide minerals and ores, Avnet is not positioned to conduct direct audits of smelters and refiners’ due diligence practices. Instead, it relies on initiatives such as those led by RBA, including RMI, to conduct smelter and refinery due diligence audits.

#### 5. Report annually on supply chain due diligence

- Avnet annually files a Form SD and a Conflict Minerals Report with the SEC and makes them available to the public on its website at <https://www.avnet.com/wps/portal/us/about-avnet/human-rights/conflict-minerals>.

### Results of 2022 Conflict Minerals Program

As a downstream purchaser of components, parts and products that may contain CMs, Avnet’s 2022 Program can provide only reasonable, but not absolute, assurance regarding the country of origin and chain of custody of the necessary CMs in its Covered Products.

The due diligence process is based on Avnet requesting information from its direct Suppliers, with those Suppliers requesting similar information from their suppliers and so on, up the supply chain, to eventually identify the original sources of the necessary CMs. However, those who purchase CMs directly from smelters or refiners may not be able to discern which of its product lines include specific CMs from each smelter or refiner, and so it is common practice for such purchasers to list all smelters and refiners they may purchase from within the reporting period. Likewise, Suppliers’ CMRTs primarily provided information at the company level, with few at the product level, and Suppliers may have received similar information from their suppliers and so on. Therefore, Avnet must rely, in good faith, on its direct Suppliers to provide it with valid and complete information. Finally, not all Suppliers completed CMRTs or completed CMRTs in full for the 2022 Program.

For the 2022 Program, 429 Suppliers were identified, of which 297 (or 69.2%) submitted a completed CMRT, an increase from the 2021 program.

**Supplier CMRT Results**

| <b>Year of Program</b> | <b># Suppliers in Scope</b> | <b># Completed CMRTs</b> | <b>% Completed CMRTs</b> | <b># Valid CMRTs</b> | <b>% Valid CMRTs</b> |
|------------------------|-----------------------------|--------------------------|--------------------------|----------------------|----------------------|
| 2022                   | 429                         | 297                      | 69.2%                    | 290                  | 67.6%                |
| 2021                   | 454                         | 263                      | 57.9%                    | 251                  | 55.3%                |

**Strength of Supplier CM Program Results**

| <b>Year of Program</b> | <b># Completed CMRTS</b> | <b># Suppliers with CM programs and policies rated as strong</b> | <b># Suppliers with no CMs in their products</b> | <b>Total Suppliers with strong CM programs/policies or no CMs in products</b> | <b>% of such Suppliers</b> |
|------------------------|--------------------------|--|--|---|----------------------------|
| 2022                   | 297                      | 228  | 37   | 265   | 89.2%                      |
| 2021                   | 263                      | 193  | 39   | 232   | 88.2%                      |

The 343 legitimate smelters and refiners identified by Suppliers in completed CMRTs, which appear on the RMI-maintained smelters list, are listed in [Appendix A](#). Based on the limitations explained above, this list may be incomplete or more comprehensive than the list of smelters and refiners which actually processed the CMs contained in the Covered Products. The below table summarizes the number of such legitimate smelters and refiners which have been audited, are in the process of being audited, or not enrolled to be audited by RMI utilizing the RMAP standard as well as audit results.

**Smelter and Refiner Audit Status Results (1)**

| <b>RMI Audit Status</b>                      | <b>Legitimate Smelters and Refiners</b> |                |
|--|---|----------------|
| RMAP Conformant (2)                          | 223                                     | 65.0%          |
| RMAP Active (3)                              | 8                                       | 2.3%           |
| Non-Conformant (4)                           | 24                                      | 7.0%           |
| Not Enrolled (roll up of the statuses below) | 88                                      | 25.7%          |
| <b>Total</b>                                 | <b>343</b>                              | <b>100.00%</b> |

| <b>Not Enrolled subcategories</b>                | <b>Count</b> |
|--|--------------|
| Communication Suspended - Not Interested(5)      | 6            |
| Due Diligence Vetting Process (6)                | 0            |
| In Communication (7)                             | 14           |
| Outreach Required (8)                            | 46           |
| RMI Due Diligence Review - Unable to Proceed (9) | 22           |

(1) The compliance status information provided in the table is based solely on information made available by RMI, without independent verification by the Company.

(2) “Conformant” means that the smelter or refiner has completed the independent annual audit process and been found to be in conformance with the relevant RMAP standard, whereby verified to have conflict-free sources.

(3) “Active” means that the smelter or refiner is in the process of being independently audited or has committed to begin the audit process but has not yet been determined to be in conformance with the relevant RMAP standard.

(4) “Non-Conformant” means that the smelter or refiner has been independently assessed but found not to be in conformance with the relevant RMAP standard.

(5) “Communication Suspended – Not Interested” means the smelter or refiner has strongly communicated a lack of interest in participating in the audit program.

(6) “Due Diligence Vetting Process” means the smelter or refiner does not meet RMI’s requirements for participation in the audit program according to the Due Diligence Vetting Process.

(7) “In Communication” means the smelter or refiner is not yet active but is in communications with RMAP and/or a member company.

(8) “Outreach Required” means RMI member companies need to contact entity to encourage their participation in audit program.

(9) “RMI Due Diligence Review – Unable to Proceed” means the smelter or refiner has not met the thresholds for the Due Diligence Vetting Process after a period of 6 months. Status may change if additional information is submitted.

The aggregated list of countries of origin from which the reported smelters and refiners may have collectively sourced CMs, based on information provided through the CMRT data collection process and RMAP audits, is provided in [Appendix B](#). Based on the limitations explained above, this list may be incomplete or more comprehensive than the list of countries from which CMs contained in the Covered Products were actually sourced.

After conducting its 2022 Program, and in light of the limitations explained above, Avnet concludes that it is unable to determine the origin of the CMs contained in its Covered Products and unable to determine whether its Covered Products are DRC conflict free.

### **Steps to be taken in Calendar 2023**

As Avnet endeavors not to purchase products that contain CMs that directly or indirectly finance or benefit armed groups in the Covered Countries, and in order to mitigate the risk of purchasing such products, it has continued with its Conflict Minerals Program discussed above during calendar year 2023 and specifically plans to pursue the following steps and improvements:

- Continue to engage with Suppliers that provided incomplete responses or no responses for 2022 to help encourage them to provide requested information for 2023.
- For Suppliers whose conflict minerals compliance programs and policies are deemed weak, continue to follow-up with such Suppliers to encourage them to improve their efforts and policies.
- For new in-scope suppliers, to: (i) communicate Avnet’s sourcing expectations, including through the dissemination of the Responsible Minerals Sourcing Policy and Global Supplier Quality Handbook and inclusion of CM sourcing requirements in supplier agreements; and (ii) provide access to training and educational resources on the requirements of the Conflict Minerals Rule and to guide them on best practices, completion of a CMRT and the use of the ACM platform.
- Proactively analyze whether any CMs are present in future products that it develops or in existing products to the extent the materials included in such existing products are revised.
- Proactively seek to include CM related provisions in new or amended supplier agreements with respect to the Covered Products.

- Continue to monitor its Ethics Alertline for issues related to the Company’s conflict minerals program.

### **Cautionary Statement about Forward-Looking Statements**

Certain statements in this Report may be “forward-looking statements” within the meaning of Section 27A of the Securities Act of 1933, as amended, and Section 21E of the Securities Exchange Act of 1934, as amended. Words such as “expects,” “intends,” “plans,” “believes,” “anticipates” and similar expressions, or the use of future tense, are used to identify these forward-looking statements. Examples of forward-looking statements include statements relating to the Company’s future plans, additional steps it intends to take to mitigate the risk that the Company’s necessary CMs benefit armed groups and other statements that do not relate to historical or current facts.

Forward-looking statements are based on the Company’s current expectations and assumptions, which may not prove to be accurate. These statements are not guarantees and are subject to risks, uncertainties and changes in circumstances that are difficult to predict, including: (1) the continued implementation of satisfactory traceability and other compliance measures by Avnet’s direct and indirect suppliers on a timely basis or at all, (2) whether smelters, refiners, and other market participants responsibly source CMs and (3) political and regulatory developments regarding CMs. Actual outcomes and results may differ materially from these forward-looking statements. As a result, these statements speak only as of the date they are made and the Company undertakes no obligation to update or revise any forward-looking statement, except as required by federal securities law.

**APPENDIX A**

**List of Smelters and Refiners**

Avnet utilized data its Suppliers provided on their CMRTs for the 2022 Program along with RBA’s RMI due diligence of smelters and refiners to prepare the below list. The list: (1) may not include all of the smelters and refiners that processed CMs in the Covered Products and (2) may include smelters and refiners which processed CMs which were not contained in the products provided by the Suppliers for the Covered Products.

For RMI Audit Status:

(1) “Conformant” means that the smelter or refiner has completed the independent annual audit process and been found to be in conformance with the relevant RMAP standard, whereby verified to have conflict-free sources.

(2) “Active” means that the smelter or refiner is in the process of being independently audited or has committed to begin the audit process but has not yet been determined to be in conformance with the relevant RMAP standard.

(3) “Non-Conformant” means that the smelter or refiner has been independently assessed but found not to be in conformance with the relevant RMAP standard.

(4) “Communication Suspended – Not Interested” means the smelter or refiner has strongly communicated a lack of interest in participating in the audit program.

(5) “Due Diligence Vetting Process” means the smelter or refiner does not meet RMI’s requirements for participation in the audit program according to the Due Diligence Vetting Process.

(6) “In Communication” means the smelter or refiner is not yet active but is in communications with RMAP and/or a member company.

(7) “Outreach Required” means RMI member companies need to contact entity to encourage their participation in audit program.

(8) “RMI Due Diligence Review – Unable to Proceed” means the smelter or refiner has not met the thresholds for the Due Diligence Vetting Process after a period of 6 months. Status may change if additional information is submitted.

| <b>Mineral</b> | <b>Smelter / Refiner CID</b> | <b>Smelter / Refiner Name</b>                                 | <b>Smelter / Refiner Location</b> | <b>RMI Audit Status</b> |
|----------------|------------------------------|---|-----------------------------------|-------------------------|
| Gold           | CID000015                    | Advanced Chemical Company                                     | United States of America          | Conformant              |
| Gold           | CID000019                    | Aida Chemical Industries Co., Ltd.                            | Japan                             | Conformant              |
| Gold           | CID000035                    | Agosi AG  | Germany                           | Conformant              |
| Gold           | CID000041                    | Almalyk Mining and Metallurgical Complex (AMMC)               | Uzbekistan                        | Conformant              |
| Gold           | CID000058                    | AngloGold Ashanti Corrego do Sitio Mineracao                  | Brazil                            | Conformant              |
| Gold           | CID000077                    | Argor-Heraeus S.A.  | Switzerland                       | Conformant              |
| Gold           | CID000082                    | Asahi Pretec Corp.  | Japan                             | Conformant              |
| Gold           | CID000090                    | Asaka Riken Co., Ltd.   | Japan                             | Conformant              |
| Gold           | CID000103                    | Atasay Kuyumculuk Sanayi Ve Ticaret A.S.                      | Turkey                            | Outreach Required       |
| Gold           | CID000113                    | Aurubis AG  | Germany                           | Conformant              |
| Gold           | CID000128                    | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | Philippines                       | Conformant              |
| Gold           | CID000157                    | Boliden AB  | Sweden                            | Conformant              |

|      |           |   |                          |  |
|------|-----------|---|--------------------------|--|
| Gold | CID000176 | C. Hafner GmbH + Co. KG   | Germany                  | Conformant                                   |
| Gold | CID000180 | Caridad   | Mexico                   | Outreach Required                            |
| Gold | CID000185 | CCR Refinery - Glencore Canada Corporation                      | Canada                   | Conformant                                   |
| Gold | CID000189 | Cendres + Metaux S.A.   | Switzerland              | Non-Conformant                               |
| Gold | CID000197 | Yunnan Copper Industry Co., Ltd.                                | China                    | Outreach Required                            |
| Gold | CID000233 | Chimet S.p.A.   | Italy                    | Conformant                                   |
| Gold | CID000264 | Chugai Mining   | Japan                    | Conformant                                   |
| Gold | CID000343 | Daye Non-Ferrous Metals Mining Ltd.                             | China                    | In Communication                             |
| Gold | CID000359 | DSC (Do Sung Corporation)                                       | Korea, Republic of       | Conformant                                   |
| Gold | CID000401 | Dowa  | Japan                    | Conformant                                   |
| Gold | CID000425 | Eco-System Recycling Co., Ltd. East Plant                       | Japan                    | Conformant                                   |
| Gold | CID000493 | JSC Novosibirsk Refinery  | Russian Federation       | RMI Due Diligence Review - Unable to Proceed |
| Gold | CID000522 | Refinery of Seemine Gold Co., Ltd.                              | China                    | Outreach Required                            |
| Gold | CID000651 | Guoda Safina High-Tech Environmental Refinery Co., Ltd.         | China                    | Outreach Required                            |
| Gold | CID000671 | Hangzhou Fuchunjiang Smelting Co., Ltd.                         | China                    | Outreach Required                            |
| Gold | CID000689 | LT Metal Ltd.   | Korea, Republic of       | Conformant                                   |
| Gold | CID000694 | Heimerle + Meule GmbH   | Germany                  | Conformant                                   |
| Gold | CID000707 | Heraeus Metals Hong Kong Ltd.                                   | China                    | Conformant                                   |
| Gold | CID000711 | Heraeus Germany GmbH Co. KG                                     | Germany                  | Conformant                                   |
| Gold | CID000767 | Hunan Chenzhou Mining Co., Ltd.                                 | China                    | Outreach Required                            |
| Gold | CID000773 | Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd.             | China                    | Outreach Required                            |
| Gold | CID000778 | HwaSeong CJ CO., LTD.   | Korea, Republic of       | Communication Suspended - Not Interested     |
| Gold | CID000801 | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | China                    | Conformant                                   |
| Gold | CID000807 | Ishifuku Metal Industry Co., Ltd.                               | Japan                    | Conformant                                   |
| Gold | CID000814 | Istanbul Gold Refinery  | Turkey                   | Conformant                                   |
| Gold | CID000823 | Japan Mint  | Japan                    | Conformant                                   |
| Gold | CID000855 | Jiangxi Copper Co., Ltd.  | China                    | Conformant                                   |
| Gold | CID000920 | Asahi Refining USA Inc.   | United States of America | Conformant                                   |
| Gold | CID000924 | Asahi Refining Canada Ltd.                                      | Canada                   | Conformant                                   |
| Gold | CID000927 | JSC Ekaterinburg Non-Ferrous Metal Processing Plant             | Russian Federation       | RMI Due Diligence Review - Unable to Proceed |
| Gold | CID000929 | JSC Uralelectromed  | Russian Federation       | RMI Due Diligence Review - Unable to Proceed |
| Gold | CID000937 | JX Nippon Mining & Metals Co., Ltd.                             | Japan                    | Conformant                                   |
| Gold | CID000956 | Kazakhmys Smelting LLC  | Kazakhstan               | In Communication                             |
| Gold | CID000957 | Kazzinc   | Kazakhstan               | Conformant                                   |
| Gold | CID000969 | Kennecott Utah Copper LLC                                       | United States of America | Conformant                                   |

|      |           |   |                          |  |
|------|-----------|---|--------------------------|--|
| Gold | CID000981 | Kojima Chemicals Co., Ltd.  | Japan                    | Conformant                                   |
| Gold | CID001029 | Kyrgyzaltyn JSC   | Kyrgyzstan               | Non-Conformant                               |
| Gold | CID001032 | L'azurde Company For Jewelry  | Saudi Arabia             | RMI Due Diligence Review - Unable to Proceed |
| Gold | CID001056 | Lingbao Gold Co., Ltd.  | China                    | Outreach Required                            |
| Gold | CID001058 | Lingbao Jinyuan Tonghui Refinery Co., Ltd.                                  | China                    | Outreach Required                            |
| Gold | CID001078 | LS-NIKKO Copper Inc.  | Korea, Republic of       | Conformant                                   |
| Gold | CID001093 | Luoyang Zijin Yinhui Gold Refinery Co., Ltd.                                | China                    | Outreach Required                            |
| Gold | CID001113 | Materion  | United States of America | Conformant                                   |
| Gold | CID001119 | Matsuda Sangyo Co., Ltd.  | Japan                    | Conformant                                   |
| Gold | CID001147 | Metalor Technologies (Suzhou) Ltd.  | China                    | Conformant                                   |
| Gold | CID001149 | Metalor Technologies (Hong Kong) Ltd.                                       | China                    | Conformant                                   |
| Gold | CID001152 | Metalor Technologies (Singapore) Pte., Ltd.                                 | Singapore                | Conformant                                   |
| Gold | CID001153 | Metalor Technologies S.A.   | Switzerland              | Conformant                                   |
| Gold | CID001157 | Metalor USA Refining Corporation  | United States of America | Conformant                                   |
| Gold | CID001161 | Metalurgica Met-Mex Penoles S.A. De C.V.                                    | Mexico                   | Conformant                                   |
| Gold | CID001188 | Mitsubishi Materials Corporation  | Japan                    | Conformant                                   |
| Gold | CID001193 | Mitsui Mining and Smelting Co., Ltd.  | Japan                    | Conformant                                   |
| Gold | CID001204 | Moscow Special Alloys Processing Plant                                      | Russian Federation       | RMI Due Diligence Review - Unable to Proceed |
| Gold | CID001220 | Nadir Metal Rafineri San. Ve Tic. A.S.                                      | Turkey                   | Conformant                                   |
| Gold | CID001236 | Navoi Mining and Metallurgical Combinat                                     | Uzbekistan               | Conformant                                   |
| Gold | CID001259 | Nihon Material Co., Ltd.  | Japan                    | Conformant                                   |
| Gold | CID001325 | Ohura Precious Metal Industry Co., Ltd.                                     | Japan                    | Conformant                                   |
| Gold | CID001326 | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | Russian Federation       | RMI Due Diligence Review - Unable to Proceed |
| Gold | CID001352 | MKS PAMP SA   | Switzerland              | Conformant                                   |
| Gold | CID001362 | Penglai Penggang Gold Industry Co., Ltd.                                    | China                    | Outreach Required                            |
| Gold | CID001386 | Prioksky Plant of Non-Ferrous Metals  | Russian Federation       | RMI Due Diligence Review - Unable to Proceed |
| Gold | CID001397 | PT Aneka Tambang (Persero) Tbk  | Indonesia                | Conformant                                   |
| Gold | CID001498 | PX Precinox S.A.  | Switzerland              | Conformant                                   |
| Gold | CID001512 | Rand Refinery (Pty) Ltd.  | South Africa             | Conformant                                   |
| Gold | CID001534 | Royal Canadian Mint   | Canada                   | Conformant                                   |
| Gold | CID001546 | Sabin Metal Corp.   | United States of America | Communication Suspended - Not Interested     |
| Gold | CID001555 | Samduck Precious Metals   | Korea, Republic of       | Non-Conformant                               |
| Gold | CID001562 | Samwon Metals Corp.   | Korea, Republic of       | Communication Suspended - Not Interested     |
| Gold | CID001585 | SEMPSA Joyeria Plateria S.A.  | Spain                    | Conformant                                   |

|      |           |   |                           |  |
|------|-----------|---|---------------------------|--|
| Gold | CID001619 | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | China                     | Outreach Required                            |
| Gold | CID001622 | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.       | China                     | Conformant                                   |
| Gold | CID001736 | Sichuan Tianze Precious Metals Co., Ltd.                | China                     | Conformant                                   |
| Gold | CID001756 | SOE Shyolkovsky Factory of Secondary Precious Metals    | Russian Federation        | RMI Due Diligence Review - Unable to Proceed |
| Gold | CID001761 | Solar Applied Materials Technology Corp.                | Taiwan, Province of China | Conformant                                   |
| Gold | CID001798 | Sumitomo Metal Mining Co., Ltd.                         | Japan                     | Conformant                                   |
| Gold | CID001810 | Super Dragon Technology Co., Ltd.                       | Taiwan, Province of China | Outreach Required                            |
| Gold | CID001875 | Tanaka Kikinzoku Kogyo K.K.                             | Japan                     | Conformant                                   |
| Gold | CID001909 | Great Wall Precious Metals Co., Ltd. of CBPM            | China                     | Outreach Required                            |
| Gold | CID001916 | Shandong Gold Smelting Co., Ltd.                        | China                     | Conformant                                   |
| Gold | CID001938 | Tokuriki Honten Co., Ltd.                               | Japan                     | Conformant                                   |
| Gold | CID001947 | Tongling Nonferrous Metals Group Co., Ltd.              | China                     | Outreach Required                            |
| Gold | CID001955 | Torecom   | Korea, Republic of        | Conformant                                   |
| Gold | CID001980 | Umicore S.A. Business Unit Precious Metals Refining     | Belgium                   | Conformant                                   |
| Gold | CID001993 | United Precious Metal Refining, Inc.                    | United States of America  | Conformant                                   |
| Gold | CID002003 | Valcambi S.A.   | Switzerland               | Conformant                                   |
| Gold | CID002030 | Western Australian Mint (T/a The Perth Mint)            | Australia                 | Conformant                                   |
| Gold | CID002100 | Yamakin Co., Ltd.                                       | Japan                     | Conformant                                   |
| Gold | CID002129 | Yokohama Metal Co., Ltd.                                | Japan                     | Conformant                                   |
| Gold | CID002224 | Zhongyuan Gold Smelter of Zhongjin Gold Corporation     | China                     | Conformant                                   |
| Gold | CID002243 | Gold Refinery of Zijin Mining Group Co., Ltd.           | China                     | Conformant                                   |
| Gold | CID002282 | Morris and Watson                                       | New Zealand               | In Communication                             |
| Gold | CID002290 | SAFINA A.S.   | Czechia                   | Conformant                                   |
| Gold | CID002312 | Guangdong Jinding Gold Limited                          | China                     | Outreach Required                            |
| Gold | CID002314 | Umicore Precious Metals Thailand                        | Thailand                  | Non-Conformant                               |
| Gold | CID002459 | Geib Refining Corporation                               | United States of America  | Conformant                                   |
| Gold | CID002509 | MMTC-PAMP India Pvt., Ltd.                              | India                     | Conformant                                   |
| Gold | CID002511 | KGHM Polska Miedz Spolka Akcyjna                        | Poland                    | Conformant                                   |
| Gold | CID002515 | Fidelity Printers and Refiners Ltd.                     | Zimbabwe                  | RMI Due Diligence Review - Unable to Proceed |
| Gold | CID002516 | Singway Technology Co., Ltd.                            | Taiwan, Province of China | Non-Conformant                               |
| Gold | CID002525 | Shandong Humon Smelting Co., Ltd.                       | China                     | Outreach Required                            |
| Gold | CID002527 | Shenzhen Zhonghenglong Real Industry Co., Ltd.          | China                     | Outreach Required                            |
| Gold | CID002560 | Al Etihad Gold Refinery DMCC                            | United Arab Emirates      | Conformant                                   |
| Gold | CID002561 | Emirates Gold DMCC                                      | United Arab Emirates      | Conformant                                   |

|      |           |  |                          |  |
|------|-----------|--|--------------------------|--|
| Gold | CID002562 | International Precious Metal Refiners                                | United Arab Emirates     | In Communication                             |
| Gold | CID002563 | Kaloti Precious Metals   | United Arab Emirates     | RMI Due Diligence Review - Unable to Proceed |
| Gold | CID002567 | Sudan Gold Refinery  | Sudan                    | Outreach Required                            |
| Gold | CID002580 | T.C.A S.p.A  | Italy                    | Conformant                                   |
| Gold | CID002582 | REMONDIS PMR B.V.  | Netherlands              | Conformant                                   |
| Gold | CID002584 | Fujairah Gold FZC  | United Arab Emirates     | Outreach Required                            |
| Gold | CID002587 | Industrial Refining Company  | Belgium                  | Non-Conformant                               |
| Gold | CID002588 | Shirpur Gold Refinery Ltd.   | India                    | Outreach Required                            |
| Gold | CID002605 | Korea Zinc Co., Ltd.   | Korea, Republic of       | Conformant                                   |
| Gold | CID002606 | Marsam Metals  | Brazil                   | Non-Conformant                               |
| Gold | CID002615 | TOO Tau-Ken-Altyn  | Kazakhstan               | Conformant                                   |
| Gold | CID002708 | Abington Reldan Metals, LLC  | United States of America | Conformant                                   |
| Gold | CID002761 | SAAMP  | France                   | Conformant                                   |
| Gold | CID002762 | L'Orfebre S.A.   | Andorra                  | Conformant                                   |
| Gold | CID002763 | 8853 S.p.A.  | Italy                    | Non-Conformant                               |
| Gold | CID002765 | Italpreziosi   | Italy                    | Conformant                                   |
| Gold | CID002778 | WIELAND Edelmetalle GmbH   | Germany                  | Conformant                                   |
| Gold | CID002779 | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH          | Austria                  | Conformant                                   |
| Gold | CID002850 | AU Traders and Refiners  | South Africa             | Non-Conformant                               |
| Gold | CID002852 | GGC Gujrat Gold Centre Pvt. Ltd.                                     | India                    | Active                                       |
| Gold | CID002853 | Sai Refinery   | India                    | Outreach Required                            |
| Gold | CID002857 | Modeltech Sdn Bhd  | Malaysia                 | Non-Conformant                               |
| Gold | CID002863 | Bangalore Refinery   | India                    | Conformant                                   |
| Gold | CID002865 | Kyshtym Copper-Electrolytic Plant ZAO                                | Russian Federation       | RMI Due Diligence Review - Unable to Proceed |
| Gold | CID002867 | Degussa Sonne / Mond Goldhandel GmbH                                 | Germany                  | Outreach Required                            |
| Gold | CID002872 | Pease & Curren   | United States of America | Communication Suspended - Not Interested     |
| Gold | CID002893 | JALAN & Company  | India                    | Outreach Required                            |
| Gold | CID002918 | SungEel HiMetal Co., Ltd.  | Korea, Republic of       | Conformant                                   |
| Gold | CID002919 | Planta Recuperadora de Metales SpA                                   | Chile                    | Conformant                                   |
| Gold | CID002920 | ABC Refinery Pty Ltd.  | Australia                | Outreach Required                            |
| Gold | CID002973 | Safimet S.p.A  | Italy                    | Non-Conformant                               |
| Gold | CID003153 | State Research Institute Center for Physical Sciences and Technology | Lithuania                | Outreach Required                            |
| Gold | CID003185 | African Gold Refinery  | Uganda                   | RMI Due Diligence Review - Unable to Proceed |
| Gold | CID003186 | Gold Coast Refinery  | Ghana                    | Outreach Required                            |
| Gold | CID003189 | NH Recytech Company  | Korea, Republic of       | Conformant                                   |

|          |           |   |                          |  |
|----------|-----------|---|--------------------------|--|
| Gold     | CID003324 | QG Refining, LLC                              | United States of America | Outreach Required                        |
| Gold     | CID003348 | Dijllah Gold Refinery FZC                     | United Arab Emirates     | Outreach Required                        |
| Gold     | CID003382 | CGR Metalloys Pvt Ltd.                        | India                    | Outreach Required                        |
| Gold     | CID003383 | Sovereign Metals                              | India                    | Outreach Required                        |
| Gold     | CID003421 | C.I Metales Procesados Industriales SAS       | Colombia                 | Active                                   |
| Gold     | CID003424 | Eco-System Recycling Co., Ltd. North Plant    | Japan                    | Conformant                               |
| Gold     | CID003425 | Eco-System Recycling Co., Ltd. West Plant     | Japan                    | Conformant                               |
| Gold     | CID003461 | Augmont Enterprises Private Limited           | India                    | Active                                   |
| Gold     | CID003463 | Kundan Care Products Ltd.                     | India                    | In Communication                         |
| Gold     | CID003487 | Emerald Jewel Industry India Limited (Unit 1) | India                    | In Communication                         |
| Gold     | CID003488 | Emerald Jewel Industry India Limited (Unit 2) | India                    | In Communication                         |
| Gold     | CID003489 | Emerald Jewel Industry India Limited (Unit 3) | India                    | In Communication                         |
| Gold     | CID003490 | Emerald Jewel Industry India Limited (Unit 4) | India                    | In Communication                         |
| Gold     | CID003497 | K.A. Rasmussen                                | Norway                   | Outreach Required                        |
| Gold     | CID003500 | Alexy Metals                                  | United States of America | Active                                   |
| Gold     | CID003529 | Sancus ZFS (L'Orfebre, SA)                    | Colombia                 | Conformant                               |
| Gold     | CID003540 | Sellem Industries Ltd.                        | Mauritania               | Communication Suspended - Not Interested |
| Gold     | CID003548 | MD Overseas                                   | India                    | In Communication                         |
| Gold     | CID003557 | Metallix Refining Inc.                        | United States of America | In Communication                         |
| Gold     | CID003575 | Metal Concentrators SA (Pty) Ltd.             | South Africa             | Conformant                               |
| Gold     | CID003615 | WEEEREFINING                                  | France                   | Active                                   |
| Gold     | CID002750 | Shenzhen CuiLu Gold Co., Ltd.                 | China                    | Outreach Required                        |
| Gold     | CID002760 | Albino Mountinho Lda.                         | Portugal                 | Outreach Required                        |
| Gold     | CID003641 | Gold by Gold Colombia                         | Colombia                 | Conformant                               |
| Gold     | CID003663 | Dongwu Gold Group                             | China                    | Outreach Required                        |
| Tantalum | CID000211 | Changsha South Tantalum Niobium Co., Ltd.     | China                    | Conformant                               |
| Tantalum | CID000460 | F&X Electro-Materials Ltd.                    | China                    | Conformant                               |
| Tantalum | CID000616 | XIMEI RESOURCES (GUANGDONG) LIMITED           | China                    | Conformant                               |
| Tantalum | CID000914 | JiuJiang JinXin Nonferrous Metals Co., Ltd.   | China                    | Conformant                               |
| Tantalum | CID000917 | Jiujiang Tanbre Co., Ltd.                     | China                    | Conformant                               |
| Tantalum | CID001076 | AMG Brasil                                    | Brazil                   | Conformant                               |
| Tantalum | CID001163 | Metallurgical Products India Pvt., Ltd.       | India                    | Conformant                               |
| Tantalum | CID001175 | Mineracao Taboca S.A.                         | Brazil                   | Conformant                               |
| Tantalum | CID001192 | Mitsui Mining and Smelting Co., Ltd.          | Japan                    | Conformant                               |
| Tantalum | CID001200 | NPM Silmet AS                                 | Estonia                  | Conformant                               |
| Tantalum | CID001277 | Ningxia Orient Tantalum Industry Co., Ltd.    | China                    | Conformant                               |
| Tantalum | CID001508 | QuantumClean                                  | United States of America | Conformant                               |
| Tantalum | CID001522 | Yanling Jincheng Tantalum & Niobium Co., Ltd. | China                    | Conformant                               |

|          |           |  |                                  |  |
|----------|-----------|--|----------------------------------|--|
| Tantalum | CID001769 | Solikamsk Magnesium Works OAO                        | Russian Federation               | RMI Due Diligence Review - Unable to Proceed |
| Tantalum | CID001869 | Taki Chemical Co., Ltd.                              | Japan                            | Conformant                                   |
| Tantalum | CID001891 | Telex Metals   | United States of America         | Conformant                                   |
| Tantalum | CID001969 | Ulba Metallurgical Plant JSC                         | Kazakhstan                       | Conformant                                   |
| Tantalum | CID002492 | Hengyang King Xing Lifeng New Materials Co., Ltd.    | China                            | Conformant                                   |
| Tantalum | CID002504 | D Block Metals, LLC                                  | United States of America         | Conformant                                   |
| Tantalum | CID002505 | FIR Metals & Resource Ltd.                           | China                            | Conformant                                   |
| Tantalum | CID002506 | Jiujiang Zhongao Tantalum & Niobium Co., Ltd.        | China                            | Conformant                                   |
| Tantalum | CID002508 | XinXing HaoRong Electronic Material Co., Ltd.        | China                            | Conformant                                   |
| Tantalum | CID002512 | Jiangxi Dinghai Tantalum & Niobium Co., Ltd.         | China                            | Conformant                                   |
| Tantalum | CID002539 | KEMET de Mexico                                      | Mexico                           | Conformant                                   |
| Tantalum | CID002544 | TANIOBIS Co., Ltd.                                   | Thailand                         | Conformant                                   |
| Tantalum | CID002545 | TANIOBIS GmbH  | Germany                          | Conformant                                   |
| Tantalum | CID002548 | Materion Newton Inc.                                 | United States of America         | Conformant                                   |
| Tantalum | CID002549 | TANIOBIS Japan Co., Ltd.                             | Japan                            | Conformant                                   |
| Tantalum | CID002550 | TANIOBIS Smelting GmbH & Co. KG                      | Germany                          | Conformant                                   |
| Tantalum | CID002557 | Global Advanced Metals Boyertown                     | United States of America         | Conformant                                   |
| Tantalum | CID002558 | Global Advanced Metals Aizu                          | Japan                            | Conformant                                   |
| Tantalum | CID002707 | Resind Industria e Comercio Ltda.                    | Brazil                           | Conformant                                   |
| Tantalum | CID002842 | Jiangxi Tuohong New Raw Material                     | China                            | Conformant                                   |
| Tantalum | CID003583 | RFH Yancheng Jinye New Material Technology Co., Ltd. | China                            | Conformant                                   |
| Tantalum | CID003926 | 5D Production OU                                     | Estonia                          | Outreach Required                            |
| Tin      | CID000228 | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.    | China                            | Conformant                                   |
| Tin      | CID000292 | Alpha  | United States of America         | Conformant                                   |
| Tin      | CID000309 | PT Aries Kencana Sejahtera                           | Indonesia                        | Conformant                                   |
| Tin      | CID000402 | Dowa   | Japan                            | Conformant                                   |
| Tin      | CID000438 | EM Vinto   | Bolivia (Plurinational State Of) | Conformant                                   |
| Tin      | CID000448 | Estanho de Rondonia S.A.                             | Brazil                           | Conformant                                   |
| Tin      | CID000468 | Fenix Metals   | Poland                           | Conformant                                   |
| Tin      | CID000538 | Gejiu Non-Ferrous Metal Processing Co., Ltd.         | China                            | Conformant                                   |
| Tin      | CID000555 | Gejiu Zili Mining And Metallurgy Co., Ltd.           | China                            | Non-Conformant                               |
| Tin      | CID000942 | Gejiu Kai Meng Industry and Trade LLC                | China                            | Non-Conformant                               |
| Tin      | CID001070 | China Tin Group Co., Ltd.                            | China                            | Conformant                                   |
| Tin      | CID001105 | Malaysia Smelting Corporation (MSC)                  | Malaysia                         | Conformant                                   |
| Tin      | CID001142 | Metallic Resources, Inc.                             | United States of America         | Conformant                                   |
| Tin      | CID001173 | Mineracao Taboca S.A.                                | Brazil                           | Conformant                                   |
| Tin      | CID001182 | Minsur   | Peru                             | Conformant                                   |

|     |           |   |                                  |  |
|-----|-----------|---|----------------------------------|--|
| Tin | CID001191 | Mitsubishi Materials Corporation  | Japan                            | Conformant                                   |
| Tin | CID001231 | Jiangxi New Nanshan Technology Ltd.   | China                            | Conformant                                   |
| Tin | CID001305 | Novosibirsk Tin Combine   | Russian Federation               | RMI Due Diligence Review - Unable to Proceed |
| Tin | CID001314 | O.M. Manufacturing (Thailand) Co., Ltd.   | Thailand                         | Conformant                                   |
| Tin | CID001337 | Operaciones Metalurgicas S.A.   | Bolivia (Plurinational State Of) | Conformant                                   |
| Tin | CID001399 | PT Artha Cipta Langgeng   | Indonesia                        | Conformant                                   |
| Tin | CID001402 | PT Babel Inti Perkasa   | Indonesia                        | Conformant                                   |
| Tin | CID001406 | PT Babel Surya Alam Lestari   | Indonesia                        | Conformant                                   |
| Tin | CID001421 | PT Belitung Industri Sejahtera  | Indonesia                        | Active                                       |
| Tin | CID001428 | PT Bukit Timah  | Indonesia                        | Conformant                                   |
| Tin | CID001453 | PT Mitra Stania Prima   | Indonesia                        | Conformant                                   |
| Tin | CID001457 | PT Panca Mega Persada   | Indonesia                        | In Communication                             |
| Tin | CID001458 | PT Prima Timah Utama  | Indonesia                        | Conformant                                   |
| Tin | CID001460 | PT Refined Bangka Tin   | Indonesia                        | Conformant                                   |
| Tin | CID001463 | PT Sariwiguna Binasentosa   | Indonesia                        | Conformant                                   |
| Tin | CID001468 | PT Stanindo Inti Perkasa  | Indonesia                        | Conformant                                   |
| Tin | CID001477 | PT Timah Tbk Kundur   | Indonesia                        | Conformant                                   |
| Tin | CID001482 | PT Timah Tbk Mentok   | Indonesia                        | Conformant                                   |
| Tin | CID001486 | PT Timah Nusantara  | Indonesia                        | Active                                       |
| Tin | CID001490 | PT Tinindo Inter Nusa   | Indonesia                        | Non-Conformant                               |
| Tin | CID001493 | PT Tommy Utama  | Indonesia                        | Conformant                                   |
| Tin | CID001539 | Rui Da Hung   | Taiwan, Province of China        | Conformant                                   |
| Tin | CID001898 | Thaisarco   | Thailand                         | Conformant                                   |
| Tin | CID001908 | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.  | China                            | Non-Conformant                               |
| Tin | CID002015 | VQB Mineral and Trading Group JSC   | Viet Nam                         | Outreach Required                            |
| Tin | CID002036 | White Solder Metalurgia e Mineracao Ltda.   | Brazil                           | Conformant                                   |
| Tin | CID002158 | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.   | China                            | Conformant                                   |
| Tin | CID002180 | Tin Smelting Branch of Yunnan Tin Co., Ltd.   | China                            | Conformant                                   |
| Tin | CID002455 | CV Venus Inti Perkasa   | Indonesia                        | Conformant                                   |
| Tin | CID002468 | Magnu's Minerai's Metais e Ligas Ltda.  | Brazil                           | Conformant                                   |
| Tin | CID002478 | PT Tirus Putra Mandiri  | Indonesia                        | In Communication                             |
| Tin | CID002500 | Melt Metais e Ligas S.A.  | Brazil                           | Non-Conformant                               |
| Tin | CID002503 | PT ATD Makmur Mandiri Jaya  | Indonesia                        | Conformant                                   |
| Tin | CID002517 | O.M. Manufacturing Philippines, Inc.  | Philippines                      | Conformant                                   |
| Tin | CID002572 | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | Viet Nam                         | Non-Conformant                               |
| Tin | CID002573 | Nghe Tinh Non-Ferrous Metals Joint Stock Company                                      | Viet Nam                         | Outreach Required                            |
| Tin | CID002574 | Tuyen Quang Non-Ferrous Metals Joint Stock Company                                    | Viet Nam                         | Outreach Required                            |

|          |           |  |                          |                   |
|----------|-----------|--|--------------------------|-------------------|
| Tin      | CID002696 | PT Cipta Persada Mulia   | Indonesia                | Conformant        |
| Tin      | CID002703 | An Vinh Joint Stock Mineral Processing Company                               | Viet Nam                 | Outreach Required |
| Tin      | CID002706 | Resind Industria e Comercio Ltda.  | Brazil                   | Conformant        |
| Tin      | CID002756 | Super Ligas  | Brazil                   | Active            |
| Tin      | CID002773 | Aurubis Beerse   | Belgium                  | Conformant        |
| Tin      | CID002774 | Aurubis Berango  | Spain                    | Conformant        |
| Tin      | CID002816 | PT Sukses Inti Makmur  | Indonesia                | Conformant        |
| Tin      | CID002835 | PT Menara Cipta Mulia  | Indonesia                | Conformant        |
| Tin      | CID002858 | Modeltech Sdn Bhd  | Malaysia                 | Non-Conformant    |
| Tin      | CID003116 | Guangdong Hanhe Non-Ferrous Metal Co., Ltd.                                  | China                    | Conformant        |
| Tin      | CID003190 | Chifeng Dajingzi Tin Industry Co., Ltd.                                      | China                    | Conformant        |
| Tin      | CID003205 | PT Bangka Serumpun   | Indonesia                | Conformant        |
| Tin      | CID003208 | Pongpipat Company Limited  | Myanmar                  | Outreach Required |
| Tin      | CID003325 | Tin Technology & Refining  | United States of America | Conformant        |
| Tin      | CID003356 | Dongguan CiEXPO Environmental Engineering Co., Ltd.                          | China                    | Non-Conformant    |
| Tin      | CID003381 | PT Rajawali Rimba Perkasa  | Indonesia                | Conformant        |
| Tin      | CID003387 | Luna Smelter, Ltd.   | Rwanda                   | Conformant        |
| Tin      | CID003397 | Yunnan Yunfan Non-ferrous Metals Co., Ltd.                                   | China                    | Non-Conformant    |
| Tin      | CID003409 | Precious Minerals and Smelting Limited                                       | India                    | Non-Conformant    |
| Tin      | CID003410 | Gejiu City Fuxiang Industry and Trade Co., Ltd.                              | China                    | Outreach Required |
| Tin      | CID003449 | PT Mitra Sukses Globalindo   | Indonesia                | Conformant        |
| Tin      | CID003486 | CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda | Brazil                   | Conformant        |
| Tin      | CID003524 | CRM Synergies  | Spain                    | Conformant        |
| Tin      | CID003582 | Fabrica Auricchio Industria e Comercio Ltda.                                 | Brazil                   | Conformant        |
| Tin      | CID002593 | PT Rajehan Ariq  | Indonesia                | Conformant        |
| Tin      | CID000313 | PT Premium Tin Indonesia   | Indonesia                | Conformant        |
| Tin      | CID001419 | PT Bangka Tin Industry   | Indonesia                | In Communication  |
| Tin      | CID002570 | CV Ayi Jaya  | Indonesia                | Conformant        |
| Tin      | CID002776 | PT Bangka Prima Tin  | Indonesia                | Conformant        |
| Tin      | CID003831 | DS Myanmar   | Myanmar                  | Conformant        |
| Tin      | CID003868 | PT Putera Sarana Shakti (PT PSS)   | Indonesia                | Conformant        |
| Tungsten | CID000004 | A.L.M.T. Corp.   | Japan                    | Conformant        |
| Tungsten | CID000105 | Kennametal Huntsville  | United States of America | Conformant        |
| Tungsten | CID000218 | Guangdong Xianglu Tungsten Co., Ltd.   | China                    | Conformant        |
| Tungsten | CID000258 | Chongyi Zhangyuan Tungsten Co., Ltd.   | China                    | Conformant        |
| Tungsten | CID000281 | CNMC (Guangxi) PGMA Co., Ltd.  | China                    | Outreach Required |
| Tungsten | CID000568 | Global Tungsten & Powders LLC  | United States of America | Conformant        |
| Tungsten | CID000766 | Hunan Chenzhou Mining Co., Ltd.  | China                    | Conformant        |
| Tungsten | CID000769 | Hunan Jintai New Material Co., Ltd.  | China                    | Conformant        |

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|----------|-----------|--|---------------------------|--|
| Tungsten | CID000825 | Japan New Metals Co., Ltd.   | Japan                     | Conformant                                   |
| Tungsten | CID000875 | Ganzhou Huaxing Tungsten Products Co., Ltd.                                    | China                     | Conformant                                   |
| Tungsten | CID000966 | Kennametal Fallon  | United States of America  | Conformant                                   |
| Tungsten | CID002044 | Wolfram Bergbau und Hutten AG  | Austria                   | Conformant                                   |
| Tungsten | CID002082 | Xiamen Tungsten Co., Ltd.  | China                     | Conformant                                   |
| Tungsten | CID002313 | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.                          | China                     | Communication Suspended - Not Interested     |
| Tungsten | CID002315 | Ganzhou Jiangwu Ferrotungsten Co., Ltd.  | China                     | Conformant                                   |
| Tungsten | CID002316 | Jiangxi Yaosheng Tungsten Co., Ltd.  | China                     | Conformant                                   |
| Tungsten | CID002317 | Jiangxi Xincheng Tungsten Industry Co., Ltd.                                   | China                     | Conformant                                   |
| Tungsten | CID002318 | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.                  | China                     | Conformant                                   |
| Tungsten | CID002319 | Malipo Haiyu Tungsten Co., Ltd.  | China                     | Conformant                                   |
| Tungsten | CID002320 | Xiamen Tungsten (H.C.) Co., Ltd.   | China                     | Conformant                                   |
| Tungsten | CID002321 | Jiangxi Gan Bei Tungsten Co., Ltd.   | China                     | Conformant                                   |
| Tungsten | CID002494 | Ganzhou Seadragon W & Mo Co., Ltd.   | China                     | Conformant                                   |
| Tungsten | CID002502 | Asia Tungsten Products Vietnam Ltd.  | Viet Nam                  | Conformant                                   |
| Tungsten | CID002513 | Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch | China                     | Conformant                                   |
| Tungsten | CID002541 | H.C. Starck Tungsten GmbH  | Germany                   | Conformant                                   |
| Tungsten | CID002542 | TANIOBIS Smelting GmbH & Co. KG  | Germany                   | Conformant                                   |
| Tungsten | CID002543 | Masan High-Tech Materials  | Viet Nam                  | Conformant                                   |
| Tungsten | CID002551 | Jiangwu H.C. Starck Tungsten Products Co., Ltd.                                | China                     | Conformant                                   |
| Tungsten | CID002589 | Niagara Refining LLC   | United States of America  | Conformant                                   |
| Tungsten | CID002641 | China Molybdenum Tungsten Co., Ltd.  | China                     | Conformant                                   |
| Tungsten | CID002645 | Ganzhou Haichuang Tungsten Co., Ltd.   | China                     | Conformant                                   |
| Tungsten | CID002649 | Hydrometallurg, JSC  | Russian Federation        | RMI Due Diligence Review - Unable to Proceed |
| Tungsten | CID002724 | Unecha Refractory metals plant   | Russian Federation        | Non-Conformant                               |
| Tungsten | CID002827 | Philippine Chuangxin Industrial Co., Inc.                                      | Philippines               | Conformant                                   |
| Tungsten | CID002833 | ACL Metais Eireli  | Brazil                    | Non-Conformant                               |
| Tungsten | CID002845 | Moliren Ltd.   | Russian Federation        | RMI Due Diligence Review - Unable to Proceed |
| Tungsten | CID003401 | Fujian Ganmin RareMetal Co., Ltd.  | China                     | Conformant                                   |
| Tungsten | CID003407 | Lianyou Metals Co., Ltd.   | Taiwan, Province of China | Conformant                                   |
| Tungsten | CID003408 | JSC "Kirovgrad Hard Alloys Plant"  | Russian Federation        | RMI Due Diligence Review - Unable to Proceed |
| Tungsten | CID003416 | NPP Tyazhmetprom LLC   | Russian Federation        | RMI Due Diligence Review - Unable to Proceed |
| Tungsten | CID003417 | Hubei Green Tungsten Co., Ltd.   | China                     | Conformant                                   |

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|----------|-----------|--|--------------------|--|
| Tungsten | CID003427 | Albasteel Industria e Comercio de Ligas Para Fundicao Ltd. | Brazil             | Non-Conformant                               |
| Tungsten | CID003468 | Cronimet Brasil Ltda                                       | Brazil             | Conformant                                   |
| Tungsten | CID003553 | Artek LLC  | Russian Federation | RMI Due Diligence Review - Unable to Proceed |
| Tungsten | CID003609 | Fujian Xinlu Tungsten Co., Ltd.                            | China              | Conformant                                   |
| Tungsten | CID003612 | OOO "Technolom" 2  | Russian Federation | RMI Due Diligence Review - Unable to Proceed |
| Tungsten | CID003614 | OOO "Technolom" 1  | Russian Federation | RMI Due Diligence Review - Unable to Proceed |
| Tungsten | CID003643 | LLC Vostok   | Russian Federation | RMI Due Diligence Review - Unable to Proceed |
| Tungsten | CID003662 | YUDU ANSHENG TUNGSTEN CO., LTD.                            | China              | Outreach Required                            |
| Tungsten | CID003978 | HANNAE FOR T Co., Ltd.                                     | Korea, Republic of | Outreach Required                            |

**APPENDIX B**

**Countries of Origin**

Avnet utilized data its Suppliers provided on their CMRTs for the 2022 Program and relied on information provided by RBA's RMI due diligence of smelters and refiners regarding the countries of origin and mines or locations of origin to prepare the below list. The list: (1) may not include all of the countries which ultimately sourced the CMs in the Covered Products and (2) may include countries which did not ultimately source CMs contained in the Covered Products.

| <b>Country of Origin (Material)</b> |                              |                    |                      |
|-------------------------------------|------------------------------|--------------------|----------------------|
| Afghanistan                         | Czechia                      | Kenya              | Rwanda               |
| Åland Islands                       | Democratic Republic of Congo | Korea              | Samoa                |
| Albania                             | Djibouti                     | Kyrgyzstan         | Saudi Arabia         |
| American Samoa                      | Dominica                     | Liberia            | Senegal              |
| Andorra                             | Dominican Republic           | Liechtenstein      | Sierra Leone         |
| Angola                              | Ecuador                      | Lithuania          | Singapore            |
| Argentina                           | Egypt                        | Luxembourg         | Slovakia             |
| Armenia                             | Eritrea                      | Madagascar         | Slovenia             |
| Aruba                               | Estonia                      | Malaysia           | South Africa         |
| Australia                           | Ethiopia                     | Mali               | South Sudan          |
| Austria                             | Finland                      | Mauritania         | Spain                |
| Azerbaijan                          | France                       | Mexico             | Sudan                |
| Bahamas                             | Georgia                      | Mongolia           | Suriname             |
| Barbados                            | Germany                      | Morocco            | Sweden               |
| Belarus                             | Ghana                        | Mozambique         | Switzerland          |
| Belgium                             | Guam                         | Myanmar            | Taiwan               |
| Benin                               | Guatemala                    | Namibia            | Tajikistan           |
| Bermuda                             | Guinea                       | Netherlands        | Tanzania             |
| Bolivia (Plurinational State of)    | Guyana                       | New Zealand        | Thailand             |
| Brazil                              | Honduras                     | Nicaragua          | Turkey               |
| Bulgaria                            | Hong Kong                    | Niger              | Uganda               |
| Burkina Faso                        | Hungary                      | Nigeria            | United Arab Emirates |
| Burundi                             | India                        | Norway             | United Kingdom       |
| Cambodia                            | Indonesia                    | Panama             | United States        |
| Canada                              | Ireland                      | Papua New Guinea   | Uzbekistan           |
| Central African Republic            | Israel                       | Peru               | Viet Nam             |
| Chile                               | Italy                        | Philippines        | Zambia               |
| China                               | Japan                        | Poland             | Zimbabwe             |
| Colombia                            | Jersey                       | Portugal           |                      |
| Congo                               | Kazakhstan                   | Russian Federation |                      |