

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

FORM SD
Specialized Disclosure Report

SILICOM LTD.

(Exact name of registrant as specified in its charter)

ISRAEL (State or other jurisdiction of incorporation or organization)	000-23288 (Commission File Number)	N/A (IRS Employer Identification No.)
14 Atir Yeda Street, Kfar Sava, Israel (Address of principal executive offices)		4464323 (Zip Code)

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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, and provide the period to which the information in this form applies:

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2017.

Introduction

This Specialized Disclosure Report on Form SD ("**Form SD**") of Silicom Ltd. ("**Silicom**" or "**we**") for the year ended December 31, 2017 is presented to comply with Rule 13p-1 under the Securities Exchange Act of 1934, as amended ("**Rule**"). The Rule was adopted by the Securities and Exchange Commission ("**SEC**") to implement reporting and disclosure requirements related to "conflict minerals" as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 ("**Dodd-Frank Act**"). Conflict minerals are defined by the SEC as columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives, which are 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 (such minerals are referred to as "necessary conflict minerals"). For products which contain necessary conflict minerals, the registrant must conduct in good faith a reasonable country of origin inquiry designed to determine whether any of the conflict minerals originated in the Democratic Republic of the Congo ("**DRC**") or an adjoining country, collectively defined as the "Covered Countries." If, based on such inquiry, the registrant knows or has reason to believe that any of the necessary conflict minerals contained in its products originated or may have originated in a Covered Country and knows or has reason to believe that those necessary conflict minerals may not be solely from recycled or scrap sources, the registrant must conduct due diligence on the necessary conflict minerals' source and chain of custody as a method to conclude if the necessary conflict minerals contained in those products did or did not directly or indirectly finance or benefit armed groups in the Covered Countries. Products which do not contain necessary conflict minerals that directly or indirectly finance or benefit armed groups in the Covered Countries are considered "DRC conflict free". In addition, conflict minerals that a registrant obtains from recycled or scrap sources are also considered "DRC conflict free."

We use the term "conflict free" in this Form SD in a broader sense to refer to suppliers, supply chains, smelters and refiners whose sources of conflict minerals did not or do not directly or indirectly finance or benefit armed groups in the Covered Countries.

Company Overview

Silicom Ltd. is an industry-leading provider of high-performance networking and data infrastructure solutions. Designed primarily to improve performance and efficiency in Cloud and Data Center environments, Silicom's solutions increase throughput, decrease latency and boost the performance of servers and networking appliances, the infrastructure backbone that enables advanced Cloud architectures and leading technologies like NFV, SD-WAN and Cyber Security. Silicom's innovative solutions for high-density networking, high-speed fabric switching, offloading and acceleration, which utilize a range of cutting-edge silicon technologies as well as FPGA-based solutions, are ideal for scaling-up and scaling-out cloud infrastructures.

Silicom's products are used by major Cloud players, service providers, Telcos and original equipment manufacturers as components of their infrastructure offerings, including both add-on adapters in the Data Center and stand-alone virtualized CPE ("**vCPE**") and universal CPE devices at the edge. Silicom's product portfolio includes multi-port 1/10/25/40/100 Gigabit Ethernet server adapters, Intelligent Bypass solutions, Smart Card products which include smart server adapters such as redirector and switching cards, encryption and data compression hardware acceleration cards, FPGA based packet processing cards and compute blades which offer general compute capability in networking intensive environment, and Stand-Alone products, which include a family of CPE (Customer Premise Equipment), vCPE or Edge Networking Devices products.

Our products contain all 4 minerals which are defined by the Rule as Conflict Minerals.

Products

During this reporting period, we identified the products below that we manufactured or contracted to manufacture as containing necessary conflict minerals:

- (i) Server network interface cards with and without bypass (Server Adapters);
- (ii) Intelligent and programmable cards, with features such as encryption, acceleration, data compression, redirection and switching, packet processing, time stamping, packet capture solutions, FPGA based ultra-low latency solutions, other offload features and/or compute blades (Smart Cards); and

(iii) Stand-alone Products: CPE and vCPE edge devices for SD-WAN and NFV deployments, Networking Targeted Appliances, Bypass Switches and Intelligent Bypass Switches.

The products detailed above constitute all products and product lines that we manufactured or sub-contracted to manufacture in the 2017 calendar year. Accordingly, we determined that none of our products qualified as "DRC conflict free" in the 2017 calendar year.

Overview of Silicom's Conflict Minerals Program

As a product manufacturer, we are knowledgeable of the design of our products including the materials needed to construct them. We design the manufacturing processes to build those products and in some cases, design the detailed materials to manufacture those products. As a result, we know that conflict minerals (tantalum, tin, tungsten and gold, also referred to as "3TG") are necessary to the functionality or production of all of our products. Conflict minerals are obtained, via our direct suppliers, from sources worldwide, and our desire is not to eliminate those originating in the Covered Countries but rather to obtain conflict minerals from sources that do not directly or indirectly finance or benefit armed groups in the Covered Countries.

Conflict Minerals Sourcing Policy

Silicom's policy with respect to the sourcing of conflict minerals is as follows:

Silicom expects its suppliers to have in place policies and due diligence measures that will enable it to reasonably assure that products and components supplied to it containing conflict minerals are DRC conflict free. Silicom expects its suppliers to comply with the Global e-Sustainability Initiative and with the Responsible Business Alliance (RBA) (formerly the Electronic Industry Citizenship Coalition) Code of Conduct and conduct their business in alignment with Silicom's supply chain responsibility expectations.

In support of this policy, Silicom will:

- Exercise due diligence with relevant suppliers consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and encourage our suppliers to do likewise with their suppliers.
- Provide, and expect our suppliers to cooperate in providing, due diligence information to confirm the 3TG in our supply-chain is DRC conflict free.
- Collaborate with its suppliers and others on industry-wide solutions to enable products that are DRC conflict free.
- Commit to transparency in the implementation of this policy by making available reports on its progress to relevant stakeholders and the public.

The full text of our Conflict Minerals Sourcing Policy is available at <http://www.silicom-usa.com/conflict-minerals/>. 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.

Supply Chain Description

Although our hardware products contain conflict minerals, Silicom does not purchase any conflict minerals directly from mines and is many steps removed in the supply chain from the mining of the conflict minerals. We purchase materials used in our products from our suppliers and some of those materials contribute necessary conflict minerals to our products and/or production process. The origin of conflict minerals cannot be determined with any certainty once the ores are smelted, refined and converted to ingots, bullion or other conflict minerals containing derivatives. The smelters and refiners (sometimes 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 direct suppliers to assist with our reasonable country of origin inquiry and due diligence efforts, including the identification of smelters and refiners, for the conflict minerals contained in the materials which they supply to us.

During the last several years proofing of being conflict-free supplier has become major consideration in choosing new supplier.

Silicom has well established and structured process of new supplier approval, when information about conflict minerals is necessary for supplier approval.

SECTION 1 – CONFLICT MINERALS DISCLOSURE

Item 1.01 Conflict Minerals Disclosure and Report

Description of Reasonable Country of Origin Inquiry ("RCOI") Efforts

Below is a description of our efforts to determine whether any of the necessary conflict minerals in our products originated in the Covered Countries during 2017.

We conducted an analysis of our production process and end products and found that 3TG are used in certain of our products.

For 2017, we have conducted a supply chain survey with all the direct vendors from whom we purchase our products to obtain country of origin information for the necessary conflict minerals in our products using the Conflict Minerals Reporting Template ("CMRT"), an industry standard template for conflict minerals reporting designed by the Responsible Minerals Initiative ("RMI") (formerly the Conflict Free Sourcing Initiative, or CFSI). However, as a result of the complexity of our products and the constant evolution of our supply chain, it is difficult to identify sub-tier suppliers downstream from the direct vendors from whom we purchase our products.

Vendors who are relevant for the survey were thoroughly chosen using following process:

1. A list of all vendors from which Silicom purchases its products was generated from our ERP system. The total number of vendors was 747.
2. Irrelevant vendors were then eliminated from the list mentioned above. Irrelevant vendors are defined as those who (a) do not provide goods, but rather provide services, office supplies, infrastructure services, etc.; (b) do not provide goods that are part of our products (i.e. packaging); (c) supply components or materials that do not, by their nature, contain 3TG materials (i.e. paper labels, glue, etc.); (d) inactive suppliers (i.e. those from whom Silicom purchased no supplies in 2017). After such elimination we remained with 228 vendors.
3. Silicom sent requests to such 228 vendors that were active vendors during 2017.

Silicom requested such vendors to complete a conflict minerals survey, based on the CMRT.

All received CMRTs were checked and verified. In case of non-conformance – Silicom contacted vendors in order to receive action plan, defining the way to remove those non-compliant smelters from their supply chain.

The supply chain survey requests direct vendors to identify the smelters and refiners and countries of origin of the conflict minerals in products they supply to Silicom. We received responses from our vendors, representing over 99.9% of our total direct spend with our vendors during 2017. We compared the smelters and refiners identified in the surveys against the lists of facilities which have received a "conflict free" designation by the RMI. Those designations provide country of origin information on the conflict minerals sourced by such facilities (such as third party software provider's database).

Non-responsive vendors were contacted a minimum of three times by the Silicom Sustainability Team in direct communications by email and telephone.

Vendor responses were examined and the quality and relevance of their answers were verified when required, including by validation of all CMRTs which were provided to Silicom. The goal of data validation was to increase the accuracy of the responses that were provided to Silicom and identify any discrepancies and contradictory answers in the CMRTs.

As of May 22, 2018, there were 17 invalid supplier submissions, which were identified as such due to, among other things, incorrect smelter names or invalid CID identification numbers.

When a smelter or refiner in our supply chain was not listed as having received a "conflict free" designation, we asked our vendors to proactively contact such facility and requested country of origin information for the necessary conflict minerals that it processed. In addition, we are taking all measures that we deem fit to replace such vendors by others – who are declared as conflict-free. We documented country of origin information for the smelters and refiners identified by the supply-chain survey.

There is a significant overlap between our RCOI efforts and our due diligence measures performed. Our due diligence measures performed were based on the findings of RCOI and are discussed further in the Conflict Minerals Report filed as Exhibit 1.02 hereto.

Conflict Minerals Disclosure

This Form SD and the Conflict Minerals Report, filed as Exhibit 1.02 hereto, are publicly available at <http://www.silicom-usa.com/conflict-minerals/> as well as the SEC's EDGAR database at www.sec.gov.

Item 1.02 Exhibits

The Conflict Minerals Report required by Item 1.01 is filed as Exhibit 1.02 to this Form SD.

SECTION 2 – EXHIBITS

Item 2.01 Exhibits

Exhibit 1.02 – Conflict Minerals Report as required by Items 1.01 and 1.02 of this Form.

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.

Silicom Ltd.

(Registrant)

/s/Daniel Cohen

By: Daniel Cohen, VP Operations

May 23, 2018

(Date)

Exhibit 1.02

Silicom Ltd.

Conflict Minerals Report

For The Year Ended December 31, 2017

This report for the year ended December 31, 2017 is presented to comply with Section 13(p) of the Securities Exchange Act of 1934 and Rule 13p-1 (the "**Rule**") and Form SD thereunder. The Rule was adopted by the Securities and Exchange Commission ("**SEC**") to implement reporting and disclosure requirements related to conflict minerals as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 ("**Dodd-Frank Act**"). These requirements apply to registrants whatever the geographic origin of the conflict minerals and whether or not they fund armed conflict.

Design of Conflict Minerals Due Diligence Program

The design of our conflict minerals due diligence program is in conformity 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, Second Edition, and related Supplements on Tin, Tantalum and Tungsten and on Gold (collectively, "**OECD Guidance**"), specifically as it relates to our position in the minerals supply chain as a "downstream" purchaser. We designed our due diligence program, management and measures to conform in all material respects with the framework OECD Guidance.

Description of Performed Conflict Minerals Due Diligence Program

(i) Maintaining of Strong Company Management Systems

- a. Silicom has adopted and committed to a conflict minerals policy for minerals originating from conflict-affected and high-risk areas. More information about Silicom's Conflict Minerals policy can be found in the RCOI section above.
Our management system includes a Conflict Minerals Qualification Team overseen by the Chief Financial Officer of the Company and run under the supervision of the Company's QA & EMS Director, and includes a team of subject matter experts from relevant functions including Operations and Purchasing. Senior management is briefed about the results of our due diligence efforts on a regular basis.
- b. Implement a supply chain system of controls and transparency through the use of due diligence software provided by third party software supplier.
- c. Incorporate requirements related to conflict minerals in our standard template for vendor contracts and specifications.
- d. Silicom conducts training to vendors from whom it purchases its products (to whom we refer to as "vendors"), assists vendors in educating their own suppliers, by informing them on the Rule, referring vendors to the Responsible Minerals Initiative ("**RMI**") (formerly the Conflict Free Sourcing Initiative, or CFSI) website and online training materials and providing Silicom's Conflict Minerals policy and due diligence procedures.
- e. Maintain a documentation and record maintenance mechanism to ensure the retaining of relevant documentation in an electronic database for at least 5 years.
- f. Enable employees, vendors and other stakeholders to report any concerns relating to our conflict minerals program by contacting Silicom on our Conflict Minerals page: <http://www.silicom-usa.com/conflict-minerals/>

(ii) Identification and Assessment of Risk in the Supply Chain

Vendors of Conflict Minerals "necessary to the functionality of the products" were identified.

We assessed two primary risks in our supply chain: (1) the risk of not receiving on time and accurate information from the vendor; and (2) the risk of not being able to replace a single source vendor while trying to move towards the goal of being a conflict free company. This assessment assisted us to segment our vendors into three risk levels (high, medium and low) which led our risk strategy approach.

We conducted a survey of our active vendors using the template developed by RMI, known as the Conflict Minerals Reporting Template ("**CMRT**"). Vendors were requested to use CMRT of revision 5.01 and above.

(iii) Design and Implementation of a Strategy to Respond to Identified Risks

- a. We performed reviews of vendors, smelters and refiners that could be sourcing or processing conflict minerals from the Covered Countries which could not be from recycled or scrap sources.
- b. As part of Silicom's risk based approach, Silicom has decided to focus its risk management actions on vendors with a volume spend of over US \$1,000 in 2017. Smelter information was requested from all direct vendors, and smelter data was collected from vendors with a volume spend of over US \$1,000 as a high priority by contacting them several times, if required, in order to obtain the necessary information from them.
- c. We monitored and tracked vendors (as described in RCOI section above), smelters and/or refiners identified as not meeting the requirements (or that defined themselves as "Unknown" or "Undeterminable" or "Sourced from DRC") set forth in our Conflict Minerals Sourcing Policy or contractual requirements to determine their progress in meeting those requirements.
- d. Any new vendor was required to complete RMI declarations as part of becoming an approved vendor to Silicom.
- e. We provided periodic progress reports to our senior management relating to our risk mitigation efforts.
- f. In general, supply chain Due Diligence is a dynamic process and requires on-going risk monitoring. This process is performed twice a year and updated CMRT is being released after completion of each Due Diligence cycle.
- g. Follow up letters were sent to high and medium risk vendors which have non-compliant smelters in their supply chain. Non-responsive vendors were reminded several times by e-mails and, if remained non-responsive thereafter, such vendors were personally approached by our Sustainability Team or by our Purchasing Team and warned that if they remain non-responsive they will be removed from our approved vendor list, and if they remained non-responsive despite our continued efforts to contact them, we removed them from our approved vendor list.

(iv) Carry out independent third-party audit of smelter/refiner's due diligence practices:

We encourage our vendors to purchase from RMI Compliant Smelters. We rely on compliant and active smelters list.

(v) Report on Supply Chain Due Diligence

This Report is available on our website at <http://www.silicom-usa.com/conflict-minerals/>. This Report is being filed to the SEC and is also available on the SEC's EDGAR database at www.sec.gov.

Results of our Assessment

As a downstream purchaser of 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 vendors and those vendors seeking similar information within their supply chains to identify the original sources of the necessary conflict minerals. We also gather required information (CMRT) from websites of vendors where conflict minerals reports were available. We also rely, to a large extent, on information collected and provided by independent third party audit programs. Such sources of information may yield inaccurate or incomplete information and may be subject to fraud because the information gathered from Silicom's vendors is not on a continuous, real-time basis.

Supplier Chain Survey Responses

Silicom contacted 228 vendors, and the response rate achieved was over 99.9% in cost of purchased goods.

The Silicom Sustainability Team directly contacted Silicom's vendors in order to collect CMRTs. Following the efforts of Silicom's Sustainability Team, 208 vendors delivered satisfactory CMRTs. For the purposes hereof, Silicom considers CMRTs to be satisfactory if they do not include any deficiencies or discrepancies and comply, in form and in substance, with the terms governing the RMI, such as blank rows, scope not matching PN list, inclusion of irrelevant information, etc.

17 of the 228 vendors delivered CMRTs with invalid supplier submissions, like incorrect smelter name or invalid CID identification number. Following our requests for improved CMRTs, we received satisfactory CMRTs submissions from all such vendors.

74 vendors were classified as "Not from DRC" – vendors that reported that they were sourcing minerals from countries other than the Covered Countries.

83 vendors were classified as "DRC conflict free" – vendors that reported that the 3TG minerals being used in the products provided to Silicom originate from Covered Countries but the smelters are approved by the RMI

6 vendors were classified as "DRC Not conflict free" – vendors that reported that the 3TG minerals being used in the products provided to Silicom originate from Covered Countries and the smelters are not approved by the RMI.

28 vendors were classified as "Free no 3TG" – vendors that reported that 3TG minerals are not necessary for the functionality or production of the products provided to Silicom.

11 vendors were classified as "Undetermined not from DRC" – vendors that reported that the 3TG being used in the products supplied to Silicom do not originate from Covered Countries but since they have not yet concluded their due diligence process, their determination and responses are not yet final and may vary. Consequently, our due diligence for these vendors is still ongoing.

6 vendors were classified as "Undetermined from DRC" – vendors that reported that the 3TG being used in the products supplied to Silicom originate from Covered Countries and the smelters are approved by the RMI program, but they have not yet concluded their due diligence process so their determination and responses are not yet final and may vary. Consequently, our due diligence for these vendors is still ongoing.

Of the 208 vendors that delivered satisfactory CMRTs:

128 vendors provided data at a "Company" level;

30 vendors provided data at a "User defined" level;

50 vendors provided data at a "Product" level;

As we are attentive to market requests, we asked several of these vendors to provide data at a "Company" level as well as at a "Product" level, and such vendors provided the data at both levels.

Below is a summary of the country of origin information collected as a result of our RCOI efforts.

Conflict Mineral	Countries of origin and other sources may include the following
Gold	Australia, Austria, Andorra, Belgium, Brazil, Canada, Chile, China, Czech Republic, France, Germany, India, Indonesia, Italy, Japan, Kazakhstan, Republic of Korea, Kyrgyzstan, Lithuania, Malaysia, Mexico, Netherlands, New Zealand, Philippines, Poland, Russian, Saudi Arabia, Singapore, South Africa, Spain, Sudan, Sweden, Switzerland, Taiwan, Thailand, Turkey, United Arab Emirates, United States, Uzbekistan, Zimbabwe, Zambia, and recycled or scrap sources.
Tantalum	Brazil, China, Estonia, Germany, India, Japan, Kazakhstan, Macedonia, Mexico, Russian Federation, Thailand, United States, and recycled or scrap sources.
Tungsten	Austria, Brazil, China, Germany, Japan, Republic of Korea, Philippines, Russian Federation, United States, Vietnam, and recycled or scrap sources.
Tin	Belgium, Bolivia, Brazil, China, Indonesia, Japan, Malaysia, Myanmar, Peru, Philippines, Poland, Spain, Taiwan, Thailand, United States, Vietnam, and recycled or scrap sources.

Smelters and refiners verified as conflict free (Compliant) or in the audit process:

Tin	72 of 82 (88%)
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Tantalum	40 of 40 (100%)
Tungsten	41 of 46 (89%)
Gold	101 of 145 (70%)
Total	254 of 313 (81%)

Part of the smelters and refiners detailed above provide more than one necessary conflict mineral.

List of the facilities which, to the extent known, processed the necessary conflict minerals used in our products can be found in Appendix 1.

Continuous Improvement Efforts to Mitigate Risks

During the reporting period for the calendar year ending December 31, 2018, we are continuing to engage in the diligence process described above.

We intent to follow up with high risk non responsive or non-compliant vendors, working with vendors to educate them on conflict minerals sourcing, contact selected smelters and refiners that have not received a "conflict free" designation etc. In eth event that any of our vendors do not cooperate with us and do not respond to our efforts in a satisfactory manner, we will disqualify them and remove them from our approved vendor list.

We intend to engage with vendors who may be sourcing from non-conflict free smelters to move towards using conflict free smelters within a reasonable time frame.

Being attentive to the market and to our customers, we are currently in the process of qualifying Silicom's line of products as "conflict free" by, among other things, requesting from all of our direct vendors to qualify the goods supplied by them to Silicom as "Conflict Free", replacing, where possible and appropriate, non-compliant vendors with compliant ones and removal of non-compliant vendors from our approved vendors list.

Appendix 1

List of smelters used in Silicom's products:

Smelter ID	Metal	Smelter or Refiner Facility Name†	Country
CID000015	Gold	Advanced Chemical Company	UNITED STATES
CID000019	Gold	Aida Chemical Industries Co., Ltd.	JAPAN
CID000035	Gold	Allgemeine Gold-und Silberscheideanstalt A.G.	GERMANY
CID000041	Gold	Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN
CID000058	Gold	AngloGold Ashanti Corrego do Sitio Mineracao	BRAZIL
CID000077	Gold	Argor-Heraeus S.A.	SWITZERLAND
CID000082	Gold	Asahi Pretec Corp.	JAPAN
CID000090	Gold	Asaka Riken Co., Ltd.	JAPAN
CID000103	Gold	Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	TURKEY
CID000113	Gold	Aurubis AG	GERMANY

CID000128	Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES
CID000157	Gold	Boliden AB	SWEDEN
CID000176	Gold	C. Hafner GmbH + Co. KG	GERMANY
CID000180	Gold	Caridad	MEXICO
CID000185	Gold	CCR Refinery - Glencore Canada Corporation	CANADA
CID000189	Gold	Cendres + Metaux S.A.	SWITZERLAND
CID000197	Gold	Yunnan Copper Industry Co., Ltd.	CHINA
CID000233	Gold	Chimet S.p.A.	ITALY
CID000264	Gold	Chugai Mining	JAPAN
CID000328	Gold	Daejin Indus Co., Ltd.	KOREA, REPUBLIC OF
CID000343	Gold	Daye Non-Ferrous Metals Mining Ltd.	CHINA
CID000359	Gold	DSC (Do Sung Corporation)	KOREA, REPUBLIC OF
CID000362	Gold	DODUCO Contacts and Refining GmbH	GERMANY
CID000401	Gold	Dowa	JAPAN
CID000425	Gold	Eco-System Recycling Co., Ltd.	JAPAN
CID000493	Gold	OJSC Novosibirsk Refinery	RUSSIAN FEDERATION
CID000522	Gold	Refinery of Seemine Gold Co., Ltd.	CHINA
CID000651	Gold	Guoda Safina High-Tech Environmental Refinery Co., Ltd.	CHINA
CID000671	Gold	Hangzhou Fuchunjiang Smelting Co., Ltd.	CHINA
CID000689	Gold	HeeSung Metal Ltd.	KOREA, REPUBLIC OF
CID000694	Gold	Heimerle + Meule GmbH	GERMANY
CID000707	Gold	Heraeus Metals Hong Kong Ltd.	CHINA
CID000711	Gold	Heraeus Precious Metals GmbH & Co. KG	GERMANY
CID000767	Gold	Hunan Chenzhou Mining Co., Ltd.	CHINA
CID000778	Gold	HwaSeong CJ CO., LTD.	KOREA, REPUBLIC OF

CID000801	Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CHINA
CID000807	Gold	Ishifuku Metal Industry Co., Ltd.	JAPAN
CID000814	Gold	Istanbul Gold Refinery	TURKEY
CID000823	Gold	Japan Mint	JAPAN
CID000855	Gold	Jiangxi Copper Co., Ltd.	CHINA
CID000920	Gold	Asahi Refining USA Inc.	UNITED STATES
CID000924	Gold	Asahi Refining Canada Ltd.	CANADA
CID000927	Gold	JSC Ekaterinburg Non-Ferrous Metal Processing Plant	RUSSIAN FEDERATION
CID000929	Gold	JSC Uralelectromed	RUSSIAN FEDERATION
CID000937	Gold	JX Nippon Mining & Metals Co., Ltd.	JAPAN
CID000956	Gold	Kazakhmys Smelting LLC	KAZAKHSTAN
CID000957	Gold	Kazzinc	KAZAKHSTAN
CID000969	Gold	Kennecott Utah Copper LLC	UNITED STATES
CID000981	Gold	Kojima Chemicals Co., Ltd.	JAPAN
CID001029	Gold	Kyrgyzaltyn JSC	KYRGYZSTAN
CID001032	Gold	L'azurde Company For Jewelry	SAUDI ARABIA
CID001056	Gold	Lingbao Gold Co., Ltd.	CHINA
CID001058	Gold	Lingbao Jinyuan Tonghui Refinery Co., Ltd.	CHINA
CID001078	Gold	LS-NIKKO Copper Inc.	KOREA, REPUBLIC OF
CID001093	Gold	Luoyang Zijin Yinhui Gold Refinery Co., Ltd.	CHINA
CID001113	Gold	Materion	UNITED STATES
CID001119	Gold	Matsuda Sangyo Co., Ltd.	JAPAN
CID001147	Gold	Metalor Technologies (Suzhou) Ltd.	CHINA
CID001149	Gold	Metalor Technologies (Hong Kong) Ltd.	CHINA
CID001152	Gold	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE
CID001153	Gold	Metalor Technologies S.A.	SWITZERLAND

CID001157	Gold	Metalor USA Refining Corporation	UNITED STATES
CID001161	Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	MEXICO
CID001188	Gold	Mitsubishi Materials Corporation	JAPAN
CID001193	Gold	Mitsui Mining and Smelting Co., Ltd.	JAPAN
CID001204	Gold	Moscow Special Alloys Processing Plant	RUSSIAN FEDERATION
CID001220	Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	TURKEY
CID001236	Gold	Navoi Mining and Metallurgical Combinat	UZBEKISTAN
CID001259	Gold	Nihon Material Co., Ltd.	JAPAN
CID001322	Gold	Elemetal Refining, LLC	UNITED STATES
CID001325	Gold	Ohura Precious Metal Industry Co., Ltd.	JAPAN
CID001326	Gold	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	RUSSIAN FEDERATION
CID001352	Gold	PAMP S.A.	SWITZERLAND
CID001362	Gold	Penglai Penggang Gold Industry Co., Ltd.	CHINA
CID001386	Gold	Prioksky Plant of Non-Ferrous Metals	RUSSIAN FEDERATION
CID001397	Gold	PT Aneka Tambang (Persero) Tbk	INDONESIA
CID001498	Gold	PX Precinox S.A.	SWITZERLAND
CID001512	Gold	Rand Refinery (Pty) Ltd.	SOUTH AFRICA
CID001534	Gold	Royal Canadian Mint	CANADA
CID001546	Gold	Sabin Metal Corp.	UNITED STATES
CID001555	Gold	Samduck Precious Metals	KOREA, REPUBLIC OF
CID001562	Gold	Samwon Metals Corp.	KOREA, REPUBLIC OF
CID001585	Gold	SEMPSA Joyeria Plateria S.A.	SPAIN
CID001619	Gold	Shandong Tiancheng Biological Gold Industrial Co., Ltd.	CHINA
CID001622	Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CHINA
CID001736	Gold	Sichuan Tianze Precious Metals Co., Ltd.	CHINA

CID001756	Gold	SOE Shyolkovsky Factory of Secondary Precious Metals	RUSSIAN FEDERATION
CID001761	Gold	Solar Applied Materials Technology Corp.	TAIWAN
CID001798	Gold	Sumitomo Metal Mining Co., Ltd.	JAPAN
CID001875	Gold	Tanaka Kikinzoku Kogyo K.K.	JAPAN
CID001909	Gold	Great Wall Precious Metals Co., Ltd. of CBPM	CHINA
CID001916	Gold	The Refinery of Shandong Gold Mining Co., Ltd.	CHINA
CID001938	Gold	Tokuriki Honten Co., Ltd.	JAPAN
CID001947	Gold	Tongling Nonferrous Metals Group Co., Ltd.	CHINA
CID001955	Gold	Torecom	KOREA, REPUBLIC OF
CID001977	Gold	Umicore Brasil Ltda.	BRAZIL
CID001980	Gold	Umicore S.A. Business Unit Precious Metals Refining	BELGIUM
CID001993	Gold	United Precious Metal Refining, Inc.	UNITED STATES
CID002003	Gold	Valcambi S.A.	SWITZERLAND
CID002030	Gold	Western Australian Mint (T/a The Perth Mint)	AUSTRALIA
CID002100	Gold	Yamakin Co., Ltd.	JAPAN
CID002129	Gold	Yokohama Metal Co., Ltd.	JAPAN
CID002224	Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA
CID002243	Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CHINA
CID002282	Gold	Morris and Watson	NEW ZEALAND
CID002290	Gold	SAFINA A.S.	CZECH REPUBLIC
CID002312	Gold	Guangdong Jinding Gold Limited	CHINA
CID002314	Gold	Umicore Precious Metals Thailand	THAILAND
CID002459	Gold	Geib Refining Corporation	UNITED STATES
CID002509	Gold	MMTC-PAMP India Pvt., Ltd.	INDIA
CID002510	Gold	Republic Metals Corporation	UNITED STATES
CID002511	Gold	KGHM Polska Miedz Spolka Akcyjna	POLAND

CID002515	Gold	Fidelity Printers and Refiners Ltd.	ZIMBABWE
CID002516	Gold	Singway Technology Co., Ltd.	TAIWAN
CID002560	Gold	Al Etihad Gold Refinery DMCC	UNITED ARAB EMIRATES
CID002561	Gold	Emirates Gold DMCC	UNITED ARAB EMIRATES
CID002563	Gold	Kaloti Precious Metals	UNITED ARAB EMIRATES
CID002567	Gold	Sudan Gold Refinery	SUDAN
CID002580	Gold	T.C.A S.p.A	ITALY
CID002582	Gold	Remondis Argentia B.V.	NETHERLANDS
CID002587	Gold	Tony Goetz NV	BELGIUM
CID002605	Gold	Korea Zinc Co., Ltd.	KOREA, REPUBLIC OF
CID002606	Gold	Marsam Metals	BRAZIL
CID002615	Gold	TOO Tau-Ken-Altyn	KAZAKHSTAN
CID002708	Gold	Abington Reldan Metals, LLC	UNITED STATES
CID002761	Gold	SAAMP	FRANCE
CID002762	Gold	L'Orfebre S.A.	ANDORRA
CID002765	Gold	Italpreziosi	ITALY
CID002777	Gold	SAXONIA Edelmetalle GmbH	GERMANY
CID002778	Gold	WIELAND Edelmetalle GmbH	GERMANY
CID002779	Gold	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	AUSTRIA
CID002850	Gold	AU Traders and Refiners	SOUTH AFRICA
CID002852	Gold	GCC Gujrat Gold Centre Pvt. Ltd.	INDIA
CID002853	Gold	Sai Refinery	INDIA
CID002854	Gold	Universal Precious Metals Refining Zambia	ZAMBIA
CID002857	Gold	Modeltech Sdn Bhd	MALAYSIA
CID002863	Gold	Bangalore Refinery	INDIA

CID002865	Gold	Kyshtym Copper-Electrolytic Plant ZAO	RUSSIAN FEDERATION
CID002866	Gold	Morris and Watson Gold Coast	AUSTRALIA
CID002867	Gold	Degussa Sonne / Mond Goldhandel GmbH	GERMANY
CID002872	Gold	Pease & Curren	UNITED STATES
CID002918	Gold	SungEel HiMetal Co., Ltd.	KOREA, REPUBLIC OF
CID002919	Gold	Planta Recuperadora de Metales SpA	CHILE
CID002973	Gold	Safimet S.p.A	ITALY
CID003153	Gold	State Research Institute Center for Physical Sciences and Technology	LITHUANIA
CID000092	Tantalum	Asaka Riken Co., Ltd.	JAPAN
CID000211	Tantalum	Changsha South Tantalum Niobium Co., Ltd.	CHINA
CID000291	Tantalum	Guangdong Rising Rare Metals-EO Materials Ltd.	CHINA
CID000456	Tantalum	Exotech Inc.	UNITED STATES
CID000460	Tantalum	F&X Electro-Materials Ltd.	CHINA
CID000616	Tantalum	Guangdong Zhiyuan New Material Co., Ltd.	CHINA
CID000914	Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINA
CID000917	Tantalum	Jiujiang Tanbre Co., Ltd.	CHINA
CID001076	Tantalum	LSM Brasil S.A.	BRAZIL
CID001163	Tantalum	Metallurgical Products India Pvt., Ltd.	INDIA
CID001175	Tantalum	Mineracao Taboca S.A.	BRAZIL
CID001192	Tantalum	Mitsui Mining and Smelting Co., Ltd.	JAPAN
CID001200	Tantalum	NPM Silmet AS	ESTONIA
CID001277	Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA
CID001508	Tantalum	QuantumClean	UNITED STATES
CID001522	Tantalum	RFH Tantalum Smeltery Co., Ltd./Yanling Jincheng Tantalum & Niobium Co., Ltd.	CHINA
CID001769	Tantalum	Solikamsk Magnesium Works OAO	RUSSIAN FEDERATION

CID001869	Tantalum	Taki Chemical Co., Ltd.	JAPAN
CID001891	Tantalum	Telex Metals	UNITED STATES
CID001969	Tantalum	Ulba Metallurgical Plant JSC	KAZAKHSTAN
CID002492	Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA
CID002504	Tantalum	D Block Metals, LLC	UNITED STATES
CID002505	Tantalum	FIR Metals & Resource Ltd.	CHINA
CID002506	Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA
CID002508	Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	CHINA
CID002512	Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHINA
CID002539	Tantalum	KEMET Blue Metals	MEXICO
CID002544	Tantalum	H.C. Starck Co., Ltd.	THAILAND
CID002545	Tantalum	H.C. Starck Tantalum and Niobium GmbH	GERMANY
CID002547	Tantalum	H.C. Starck Hermsdorf GmbH	GERMANY
CID002548	Tantalum	H.C. Starck Inc.	UNITED STATES
CID002549	Tantalum	H.C. Starck Ltd.	JAPAN
CID002550	Tantalum	H.C. Starck Smelting GmbH & Co. KG	GERMANY
CID002557	Tantalum	Global Advanced Metals Boyertown	UNITED STATES
CID002558	Tantalum	Global Advanced Metals Aizu	JAPAN
CID002568	Tantalum	KEMET Blue Powder	UNITED STATES
CID002707	Tantalum	Resind Industria e Comercio Ltda.	BRAZIL
CID002842	Tantalum	Jiangxi Tuohong New Raw Material	CHINA
CID002847	Tantalum	Power Resources Ltd.	MACEDONIA
CID003191	Tantalum	Jiujiang Janny New Material Co., Ltd.	CHINA
CID000228	Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CHINA
CID000244	Tin	Jiangxi Ketai Advanced Material Co., Ltd.	CHINA
CID000278	Tin	CNMC (Guangxi) PGMA Co., Ltd.	CHINA
CID000292	Tin	Alpha	UNITED STATES

CID000306	Tin	CV Gita Pesona	INDONESIA
CID000309	Tin	PT Aries Kencana Sejahtera	INDONESIA
CID000313	Tin	PT Premium Tin Indonesia	INDONESIA
CID000315	Tin	CV United Smelting	INDONESIA
CID000402	Tin	Dowa	JAPAN
CID000438	Tin	EM Vinto	BOLIVIA (PLURINATIONAL STATE OF)
CID000448	Tin	Estanho de Rondonia S.A.	BRAZIL
CID000468	Tin	Fenix Metals	POLAND
CID000538	Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA
CID000555	Tin	Gejiu Zili Mining And Metallurgy Co., Ltd.	CHINA
CID000760	Tin	Huichang Jinshunda Tin Co., Ltd.	CHINA
CID000942	Tin	Gejiu Kai Meng Industry and Trade LLC	CHINA
CID001070	Tin	China Tin Group Co., Ltd.	CHINA
CID001105	Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA
CID001142	Tin	Metallic Resources, Inc.	UNITED STATES
CID001173	Tin	Mineracao Taboca S.A.	BRAZIL
CID001182	Tin	Minsur	PERU
CID001191	Tin	Mitsubishi Materials Corporation	JAPAN
CID001231	Tin	Jiangxi New Nanshan Technology Ltd.	CHINA
CID001314	Tin	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND
CID001337	Tin	Operaciones Metalurgical S.A.	BOLIVIA (PLURINATIONAL STATE OF)
CID001399	Tin	PT Artha Cipta Langgeng	INDONESIA
CID001402	Tin	PT Babel Inti Perkasa	INDONESIA
CID001419	Tin	PT Bangka Tin Industry	INDONESIA
CID001421	Tin	PT Belitung Industri Sejahtera	INDONESIA

CID001428	Tin	PT Bukit Timah	INDONESIA
CID001434	Tin	PT DS Jaya Abadi	INDONESIA
CID001438	Tin	PT Eunindo Usaha Mandiri	INDONESIA
CID001448	Tin	PT Karimun Mining	INDONESIA
CID001453	Tin	PT Mitra Stania Prima	INDONESIA
CID001457	Tin	PT Panca Mega Persada	INDONESIA
CID001458	Tin	PT Prima Timah Utama	INDONESIA
CID001460	Tin	PT Refined Bangka Tin	INDONESIA
CID001463	Tin	PT Sariwiguna Binasentosa	INDONESIA
CID001468	Tin	PT Stanindo Inti Perkasa	INDONESIA
CID001471	Tin	PT Sumber Jaya Indah	INDONESIA
CID001477	Tin	PT Timah (Persero) Tbk Kundur	INDONESIA
CID001482	Tin	PT Timah (Persero) Tbk Mentok	INDONESIA
CID001490	Tin	PT Tinindo Inter Nusa	INDONESIA
CID001493	Tin	PT Tommy Utama	INDONESIA
CID001539	Tin	Rui Da Hung	TAIWAN, PROVINCE OF CHINA
CID001758	Tin	Soft Metais Ltda.	BRAZIL
CID001898	Tin	Thaisarco	THAILAND
CID001908	Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	CHINA
CID002036	Tin	White Solder Metalurgia e Mineracao Ltda.	BRAZIL
CID002158	Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA
CID002180	Tin	Yunnan Tin Company Limited	CHINA
CID002455	Tin	CV Venus Inti Perkasa	INDONESIA
CID002468	Tin	Magnu's Minerais Metais e Ligas Ltda.	BRAZIL
CID002500	Tin	Melt Metais e Ligas S.A.	BRAZIL
CID002503	Tin	PT ATD Makmur Mandiri Jaya	INDONESIA
CID002517	Tin	O.M. Manufacturing Philippines, Inc.	PHILIPPINES

CID002530	Tin	PT Inti Stania Prima	INDONESIA
CID002570	Tin	CV Ayi Jaya	INDONESIA
CID002572	Tin	Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company	VIET NAM
CID002573	Tin	Nghe Tinh Non-Ferrous Metals Joint Stock Company	VIET NAM
CID002574	Tin	Tuyen Quang Non-Ferrous Metals Joint Stock Company	VIET NAM
CID002592	Tin	CV Dua Sekawan	INDONESIA
CID002593	Tin	PT Rajehan Ariq	INDONESIA
CID002703	Tin	An Vinh Joint Stock Mineral Processing Company	VIET NAM
CID002706	Tin	Resind Industria e Comercio Ltda.	BRAZIL
CID002756	Tin	Super Ligas	BRAZIL
CID002773	Tin	Metallo Belgium N.V.	BELGIUM
CID002774	Tin	Metallo Spain S.L.U.	SPAIN
CID002776	Tin	PT Bangka Prima Tin	INDONESIA
CID002816	Tin	PT Sukses Inti Makmur	INDONESIA
CID002829	Tin	PT Kijang Jaya Mandiri	INDONESIA
CID002835	Tin	PT Menara Cipta Mulia	INDONESIA
CID002844	Tin	HuiChang Hill Tin Industry Co., Ltd.	CHINA
CID002848	Tin	Gejiu Fengming Metallurgy Chemical Plant	CHINA
CID002849	Tin	Guanyang Guida Nonferrous Metal Smelting Plant	CHINA
CID002858	Tin	Modeltech Sdn Bhd	MALAYSIA
CID002859	Tin	Gejiu Jinye Mineral Company	CHINA
CID002870	Tin	PT Lautan Harmonis Sejahtera	INDONESIA
CID003116	Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CHINA
CID003190	Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CHINA
CID003205	Tin	PT Bangka Serumpun	INDONESIA
CID003208	Tin	Pongpipat Company Limited	MYANMAR

CID000004	Tungsten	A.L.M.T. TUNGSTEN Corp.	JAPAN
CID000105	Tungsten	Kennametal Huntsville	UNITED STATES
CID000218	Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CHINA
CID000258	Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA
CID000499	Tungsten	Fujian Jinxin Tungsten Co., Ltd.	CHINA
CID000568	Tungsten	Global Tungsten & Powders Corp.	UNITED STATES
CID000766	Tungsten	Hunan Chenzhou Mining Co., Ltd.	CHINA
CID000769	Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.	CHINA
CID000825	Tungsten	Japan New Metals Co., Ltd.	JAPAN
CID000875	Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	CHINA
CID000966	Tungsten	Kennametal Fallon	UNITED STATES
CID001889	Tungsten	Tejing (Vietnam) Tungsten Co., Ltd.	VIET NAM
CID002011	Tungsten	Vietnam Youngsun Tungsten Industry Co., Ltd.	VIET NAM
CID002044	Tungsten	Wolfram Bergbau und Hutten AG	AUSTRIA
CID002082	Tungsten	Xiamen Tungsten Co., Ltd.	CHINA
CID002095	Tungsten	Xinhai Rendan Shaoguan Tungsten Co., Ltd.	CHINA
CID002313	Tungsten	Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.	CHINA
CID002315	Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHINA
CID002316	Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CHINA
CID002317	Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CHINA
CID002318	Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHINA
CID002319	Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CHINA
CID002320	Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CHINA
CID002321	Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CHINA
CID002494	Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA
CID002502	Tungsten	Asia Tungsten Products Vietnam Ltd.	VIET NAM

CID002513	Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.	CHINA
CID002535	Tungsten	Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd.	CHINA
CID002536	Tungsten	Ganzhou Yatai Tungsten Co., Ltd.	CHINA
CID002541	Tungsten	H.C. Starck Tungsten GmbH	GERMANY
CID002542	Tungsten	H.C. Starck Smelting GmbH & Co. KG	GERMANY
CID002543	Tungsten	Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC	VIET NAM
CID002551	Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA
CID002579	Tungsten	Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji	CHINA
CID002589	Tungsten	Niagara Refining LLC	UNITED STATES
CID002645	Tungsten	Ganzhou Haichuang Tungsten Co., Ltd.	CHINA
CID002647	Tungsten	Jiangxi Dayu Longxintai Tungsten Co., Ltd.	CHINA
CID002649	Tungsten	Hydrometallurg, JSC	RUSSIAN FEDERATION
CID002724	Tungsten	Unecha Refractory metals plant	RUSSIAN FEDERATION
CID002815	Tungsten	South-East Nonferrous Metal Company Limited of Hengyang City	CHINA
CID002827	Tungsten	Philippine Chuangxin Industrial Co., Inc.	PHILIPPINES
CID002830	Tungsten	Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.	CHINA
CID002833	Tungsten	ACL Metais Eireli	BRAZIL
CID002843	Tungsten	Woltech Korea Co., Ltd.	KOREA, REPUBLIC OF
CID002845	Tungsten	Moliren Ltd.	RUSSIAN FEDERATION
CID003182	Tungsten	Hunan Litian Tungsten Industry Co., Ltd.	CHINA

† Smelter and refiner facility names as reported by the RMI as of May 22, 2018.

* Denotes smelters and refiners which have received a “conflict free” designation from an independent third party audit program as of May 22, 2018.