

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

FORM SD
Specialized Disclosure Report

Diebold Nixdorf, Incorporated

(Exact name of registrant as specified in its charter)

Delaware

(State or other jurisdiction
of incorporation or organization)

1-4879

(Commission
File Number)

34-0183970

(I.R.S. Employer
Identification No.)

350 Orchard Avenue NE,
North Canton, OH

(Address of principal executive offices)

44720-2556

(Zip Code)

Susan Malcolm, Vice President, Chief Ethics and Compliance Officer
(330) 490-4000

(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, 2024.
☐ 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

Conflict Minerals Disclosure

Diebold Nixdorf, Incorporated (including its consolidated subsidiaries, the “Company”) is filing this Form SD pursuant to Rule 13p-1 under the Securities Exchange Act of 1934, as amended, for the reporting period from January 1, 2024 to December 31, 2024.

The brief description of the Company’s reasonable country of origin inquiry (“RCOI”), the results of its RCOI, and the determination the Company reached as a result of its RCOI are included in its Conflict Minerals Report, attached as an exhibit to this Form SD.

A copy of the Company’s Conflict Minerals Report is filed as Exhibit 1.01 hereto and is publicly available at <https://www.dieboldnixdorf.com/en-us/about-us/esg>. The content on, or accessible through, any website referred to in this Form SD is not incorporated by reference into this Form SD unless expressly noted.

Item 1.02 Exhibit

A copy of the Company’s Conflict Minerals Report as required by Item 1.01 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 report:

| Exhibit Number | Description |
|---------------------------|--------------------|
|---------------------------|--------------------|

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

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.

May 30, 2025

By: /s/ Elizabeth C. Radigan

Name: Elizabeth C. Radigan

Title: Executive Vice President, Chief Legal
Officer and Secretary

CONFLICT MINERALS REPORT



Diebold Nixdorf, Incorporated For the Year Ended December 31, 2024

Introduction

This Conflict Minerals Report (the “**Report**”) of Diebold Nixdorf, Incorporated, including its consolidated subsidiaries (“**we**,” “**our**,” “**Diebold Nixdorf**,” or the “**Company**”) is filed as an exhibit to Form SD as required by Rule 13p-1 (the “**Rule**”) under the Securities Exchange Act of 1934, as amended, for the reporting period from January 1, 2024 through December 31, 2024 (the “**Reporting Period**”).¹

Based on existing guidance from the Securities and Exchange Commission (the “**SEC**”), this Report has not been audited, nor is an independent private sector audit required for this Report.

Company Overview

Diebold Nixdorf, Incorporated automates, digitizes and transforms the way people bank and shop. As a partner to the majority of the world’s top 100 financial institutions and top 25 global retailers, our integrated solutions connect digital and physical channels conveniently, securely and efficiently for millions of consumers each day. Diebold Nixdorf has a presence in more than 100 countries with approximately 21,000 employees worldwide.

¹ Forward-looking statements contained in this Report are made based on known events and circumstances at the time of release, and as such, are subject in the future to unforeseen uncertainties and risks. Statements in this Report that express a belief, expectation or intention, as well as those that are not historical fact, are forward-looking statements, including statements related to Diebold Nixdorf’s compliance efforts and expected actions identified in this Report. These forward-looking statements are subject to various risks, uncertainties, and assumptions, including, among other matters, our customers’ requirements to use certain suppliers, our suppliers’ responsiveness and cooperation with our due diligence efforts, our ability to implement improvements in our conflict minerals program, and our ability to identify and mitigate related risks in our supply chain. If one or more of these or other risks materialize, actual results may vary materially from those expressed. For a more complete discussion of these and other risk factors, see Diebold Nixdorf’s other filings with the Securities and Exchange Commission (“SEC”), including its Annual Report on Form 10-K for the year ended December 31, 2024 and subsequent Quarterly Reports on Form 10-Q. Diebold Nixdorf makes these statements as of the date of this disclosure and undertakes no obligation to update them unless otherwise required by law.

Reasonable Country of Origin Inquiry

Diebold Nixdorf identified the potential use of certain necessary minerals (*i.e.*, gold, columbite-tantalite (coltan), cassiterite, wolframite, and their derivatives, which are limited to tantalum, tin, and tungsten) (“**Conflict Minerals**”) in the production of Diebold Nixdorf manufactured or contracted to manufacture products. Therefore, for the Reporting Period, a good faith, reasonable country of origin inquiry (“**RCOI**”) was undertaken to determine if any of the necessary Conflict Minerals contained in our products originated in the Democratic Republic of the Congo or an adjoining country (“**Covered Country**”) or came from recycled or scrap sources.

Our process for the Reporting Period was as follows:

We identified relevant global suppliers to survey if they matched the following criteria: (a) a spend value of \$100,000 or more in calendar year 2024 and (b) provided parts and materials directly to Diebold Nixdorf that were used for the manufacturing of, or contracting to manufacture, our products (“**Direct Suppliers**”). After identifying the relevant suppliers, we provided each of them with an email in which we reiterated Diebold Nixdorf’s dedication to supply chain transparency, provided our Supplier Code of Conduct, and instructed the Direct Suppliers to complete the most current version Conflict Minerals Reporting Template (“**CMRT**”) developed by the former Conflict-Free Sourcing Initiative, now Responsible Mineral Initiative (“**RMI**”). We reviewed the responses for completeness, accuracy, and consistency. When we determined that our Direct Suppliers’ responses contained information that we believed to be incomplete, inaccurate, or contained potentially inconsistent responses, we followed up with those Direct Suppliers by e-mail or phone to seek additional information or clarification about those responses.

Applying these criteria, we identified 175 Direct Suppliers, which constituted approximately 98% of our global direct manufacturing spend in 2024. We have maintained this level of visibility year-over-year. As of the time of this Report, we received responses from 167 of 175 of our Direct Suppliers. Each year, Diebold Nixdorf has taken steps to increase its supplier’s response rates.

Based on both the CMRT responses and Diebold Nixdorf’s RCOI response validation and data collection, we conclude that there is a possibility that certain of the Conflict Minerals in our manufactured or contracted to manufacture products for the Reporting Period may have originated in a Covered Country and are not from recycled or scrap sources. Accordingly, we performed due diligence in an effort to determine the source and chain of custody of these necessary Conflict Minerals.

Due Diligence

Design of Due Diligence

Diebold Nixdorf's due diligence process was designed to conform, in all material respects, with the framework in the Organisation for Economic Co-operation and Development ("**OECD**") Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition, 2016, and the related Supplements for tin, tantalum, and tungsten and for gold ("**OECD Guidance**"), as it relates to Diebold Nixdorf's position in the supply chain as a "downstream" purchaser.

Due Diligence Measures Performed

The following is a description of the due diligence measures we performed for the Reporting Period in accordance with the OECD Guidance.

OECD Step 1: Establish and Maintain Strong Company Management Systems

Diebold Nixdorf maintains a Global Sustainability Council (the "**Council**"). The Council assists the Executive Leadership Team (the "**ELT**") in fulfilling its responsibility for oversight of sustainability, human rights and corporate social responsibility policies, strategies and programs of the Company. Amongst its other objectives, the Council sets and manages our objectives and processes regarding Conflict Minerals.

Diebold Nixdorf's Conflict Minerals Policy (the "**Policy**") sets forth our internal compliance requirements regarding Conflict Minerals. The Policy, which is reviewed annually, is publicly available on our company website at: <https://www.dieboldnixdorf.com/-/media/diebold/files/about-us/corporate-responsibility/conflict-minerals-policy.pdf>. The content of any website referred to in this Report is not incorporated by reference in this Report. Pursuant to the Policy, we record and retain all information and findings from the RCOI and due diligence process for five years in a centralized electronic Company system.

All Direct Suppliers are required to support a sustainable and transparent supply chain and conduct due diligence on their own supply chains, among other things. In addition, all Direct Suppliers are required to comply with the Supplier Code of Conduct, which is available on our company website at: <https://investors.dieboldnixdorf.com/governance/policies-and-charters/default.aspx>. Our template Supplier Contract requires Direct Suppliers to adhere to our Supplier Code of Conduct and we also ask each Direct Supplier to agree to this as part of our onboarding process. Suppliers, any other third party and employees are encouraged to utilize our grievance mechanisms to report concerns or violations of Diebold Nixdorf's Code of Business Ethics, Supplier Code of Conduct, or other internal policies, including our Conflict Minerals Policy. Suppliers and

employees may contact Diebold Nixdorf's sourcing managers, our ethics and compliance team, or the Diebold Nixdorf Ethicspoint hotline, which is available at <https://secure.ethicspoint.com/domain/media/en/gui/2013/index.html> to make such reports.

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

After we received CMRT or other responses from our Direct Suppliers, we utilized internal automated and manual systems ("the **System**") to organize, sort, and analyze all CMRT data provided by Direct Suppliers.

When incomplete or non-responsive information was received, we sent follow up e-mail reminders to the Direct Supplier. If we did not receive sufficient information after e-mail reminders, the Direct Supplier was escalated to its Diebold Nixdorf sourcing manager, who was responsible for communicating directly with the Direct Supplier to resolve outstanding issues. Completed CMRTs and other responses were then loaded into our System.

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

We reviewed Direct Supplier responses for smelter and refiner information and compared that information to the list of smelters and refiners that have received a "conformant" designation from the RMI's Responsible Minerals Assurance Process ("**RMAP**"), which was formerly referred to as the Conflict-Free Smelter Program or CFSP. We reported the status of the survey and due diligence results to our Chief Ethics & Compliance Officer.

OECD Step 4: Carry out Independent Third-Party Audit of Smelter's/ Refiner's Due Diligence Practices

We do not have direct relationships or communications with smelters or refiners of Conflict Minerals and thus we do not carry out audits of these facilities. Instead, we urge our Direct Suppliers to gather information from their suppliers and the rest of their supply chain in order to accurately complete the CMRT.

OECD Step 5: Report Annually on Supply Chain Due Diligence

We report on our conflict minerals due diligence annually by making our Form SD and this Report publicly available on our website at <https://www.dieboldnixdorf.com/en-us/about-us/esg/>. Also, our Form SD (including this Report) is filed with the SEC.

Results of Review

Facilities Used to Process the Necessary Conflict Minerals

Our Direct Suppliers identified a total of 498 purported smelters and refiners in their CMRT responses. We analyzed and compared the smelters and refiners identified by our Direct Suppliers to RMAP smelter and refiner information. Based on our analysis, as of May 19, 2025, we determined that 253 were designated conformant and active by the RMAP.

Most of our Direct Suppliers provided their responses at a company level and, although some of the Direct Suppliers provided product-level responses, we were unable to determine whether a particular smelter or refiner named in the responses processed the necessary Conflict Minerals in our products.

The facilities identified by our Direct Suppliers that may have processed the Conflict Minerals contained in our products include, but may not be limited to, the RMAP conformant smelters and refiners listed in Table 1.

Country of Origin of Our Necessary Conflict Minerals

Using the RMI RCOI Data Document (content from RMI <http://www.responsiblemineralsinitiative.org/conformant-smelter-refiner-lists/> as of May 19, 2025), we were able to gather information about countries of origin associated with the RMAP conformant smelters and refiners named by our Direct Suppliers, but we are not able to determine the country of origin of the specific Conflict Minerals contained in the products we purchased from our Direct Suppliers. According to the information available to us from the RMI, the list of countries of origin associated with the RMAP conformant smelters and refiners listed on Table 1 is attached hereto as Table 2.

Efforts to Determine the Mine or Location of Origin

We have determined that the most reasonable effort we can make to determine the mines or locations of origin of our Conflict Minerals with the greatest possible specificity is to seek information from our Direct Suppliers about the smelters and refiners and the countries of origin of the Conflict Minerals in the products we purchase from them and urge that our Direct Suppliers do the same with their direct suppliers. We must rely on our Direct Suppliers and indirect suppliers to provide information about the mine or location of origin of the necessary Conflict Minerals in our products.

Future Steps to Mitigate Risk

Throughout 2025, we expect to continue the due diligence measures described in this report and improve our efforts to obtain better visibility into our supply chain through the use of CMRT surveys and analysis of Direct Supplier smelter/refiner and country of origin information. We will continue to urge our Direct Suppliers to investigate their

supply chains to clarify and eliminate all undetermined or unknown responses. Internally, we expect to continue making improvements and investment into our toolbox for data intake and analysis to increase response rates from our suppliers, historically exceeding 93%. And finally, we expect to process outstanding responses from Direct Suppliers we received after the cut-off date relating to this Reporting Period as part of our ongoing Conflict Minerals program.

TABLE 1

| Metal | Smelter Name | Smelter Country |
|--------------|---|------------------------|
| Gold | Western Australian Mint (T/a The Perth Mint) | AUSTRALIA |
| Gold | Umicore S.A. Business Unit Precious Metals Refining | BELGIUM |
| Gold | AngloGold Ashanti Corrego do Sitio Mineracao | BRAZIL |
| Gold | Coimpa Industrial LTDA | BRAZIL |
| Gold | Asahi Refining Canada Ltd. | CANADA |
| Gold | CCR Refinery - Glencore Canada Corporation | CANADA |
| Gold | Royal Canadian Mint | CANADA |
| Gold | Planta Recuperadora de Metales SpA | CHILE |
| Gold | Gold Refinery of Zijin Mining Group Co., Ltd. | CHINA |
| Gold | Heraeus Metals Hong Kong Ltd. | CHINA |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | CHINA |
| Gold | Jiangxi Copper Co., Ltd. | CHINA |
| Gold | Metalor Technologies (Hong Kong) Ltd. | CHINA |
| Gold | Metalor Technologies (Suzhou) Ltd. | CHINA |
| 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 | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | CHINA |
| Gold | Gold by Gold Colombia | COLOMBIA |
| Gold | SAFINA A.S. | CZECHIA |
| Gold | WEEEREFINING | FRANCE |
| Gold | Agosi AG | GERMANY |
| Gold | Aurubis AG | GERMANY |
| Gold | C. Hafner GmbH + Co. KG | GERMANY |
| Gold | Heimerle + Meule GmbH | GERMANY |
| Gold | Heraeus Germany GmbH Co. KG | GERMANY |
| Gold | WIELAND Edelmetalle GmbH | GERMANY |
| Gold | MMTC-PAMP India Pvt., Ltd. | INDIA |
| Gold | PT Aneka Tambang (Persero) Tbk | INDONESIA |
| Gold | Chimet S.p.A. | ITALY |
| Gold | Italpreziosi | ITALY |
| Gold | T.C.A S.p.A | ITALY |
| Gold | Aida Chemical Industries Co., Ltd. | JAPAN |
| Gold | Asahi Pretec Corp. | JAPAN |
| Gold | Asaka Riken Co., Ltd. | JAPAN |
| Gold | Chugai Mining | JAPAN |
| Gold | Dowa | JAPAN |
| Gold | Eco-System Recycling Co., Ltd. East Plant | JAPAN |

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| Gold | Eco-System Recycling Co., Ltd. North Plant | JAPAN |
| Gold | Eco-System Recycling Co., Ltd. West Plant | JAPAN |
| Gold | Ishifuku Metal Industry Co., Ltd. | JAPAN |
| Gold | Japan Mint | JAPAN |
| Gold | JX Nippon Mining & Metals Co., Ltd. | JAPAN |
| Gold | Kojima Chemicals Co., Ltd. | JAPAN |
| Gold | Matsuda Sangyo Co., Ltd. | JAPAN |
| Gold | Mitsubishi Materials Corporation | JAPAN |
| Gold | Mitsui Mining and Smelting Co., Ltd. | JAPAN |
| Gold | Nihon Material Co., Ltd. | JAPAN |
| Gold | Ohura Precious Metal Industry Co., Ltd. | JAPAN |
| Gold | Sumitomo Metal Mining Co., Ltd. | JAPAN |
| Gold | Tanaka Kikinzoku Kogyo K.K. | JAPAN |
| Gold | Tokuriki Honten Co., Ltd. | JAPAN |
| Gold | Yamakin Co., Ltd. | JAPAN |
| Gold | Yokohama Metal Co., Ltd. | JAPAN |
| Gold | Kazzinc | KAZAKHSTAN |
| Gold | TOO Tau-Ken-Altyn | KAZAKHSTAN |
| Gold | DSC (Do Sung Corporation) | KOREA, REPUBLIC OF |
| Gold | Korea Zinc Co., Ltd. | KOREA, REPUBLIC OF |
| Gold | LS MnM Inc. | KOREA, REPUBLIC OF |
| Gold | LT Metal Ltd. | KOREA, REPUBLIC OF |
| Gold | NH Recytech Company | KOREA, REPUBLIC OF |
| Gold | SungEel HiMetal Co., Ltd. | KOREA, REPUBLIC OF |
| Gold | Metalurgica Met-Mex Penoles S.A. De C.V. | MEXICO |
| Gold | REMONDIS PMR B.V. | NETHERLANDS |
| Gold | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | PHILIPPINES |
| Gold | KGHM Polska Miedz Spolka Akcyjna | POLAND |
| Gold | Metalor Technologies (Singapore) Pte., Ltd. | SINGAPORE |
| Gold | Impala Refineries - Base Metals Refinery (BMR) | SOUTH AFRICA |
| Gold | Impala Refineries - Platinum Metals Refinery (PMR) | SOUTH AFRICA |
| Gold | Impala Rustenburg | SOUTH AFRICA |
| Gold | Metal Concentrators SA (Pty) Ltd. | SOUTH AFRICA |
| Gold | Rand Refinery (Pty) Ltd. | SOUTH AFRICA |
| Gold | SEMPA Joyeria Plateria S.A. | SPAIN |

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| Gold | Boliden Ronnskar | SWEDEN |
| Gold | Argor-Heraeus S.A. | SWITZERLAND |
| Gold | Metalor Technologies S.A. | SWITZERLAND |
| Gold | MKS PAMP SA | SWITZERLAND |
| Gold | PX Precinox S.A. | SWITZERLAND |
| Gold | Valcambi S.A. | SWITZERLAND |
| Gold | Elite Industech Co., Ltd. | TAIWAN, PROVINCE OF CHINA |
| Gold | Solar Applied Materials Technology Corp. | TAIWAN, PROVINCE OF CHINA |
| Gold | GG Refinery Ltd. | TANZANIA, UNITED REPUBLIC OF |
| Gold | Istanbul Gold Refinery | TURKEY |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.S. | TURKEY |
| Gold | Abington Reldan Metals, LLC | UNITED STATES OF AMERICA |
| Gold | Advanced Chemical Company | UNITED STATES OF AMERICA |
| Gold | Asahi Refining USA Inc. | UNITED STATES OF AMERICA |
| Gold | Kennecott Utah Copper LLC | UNITED STATES OF AMERICA |
| Gold | Materion | UNITED STATES OF AMERICA |
| Gold | Metalor USA Refining Corporation | UNITED STATES OF AMERICA |
| Gold | United Precious Metal Refining, Inc. | UNITED STATES OF AMERICA |
| Gold | Almalyk Mining and Metallurgical Complex (AMMC) | UZBEKISTAN |
| Gold | Navoi Mining and Metallurgical Combinat | UZBEKISTAN |
| Tantalum | AMG Brasil | BRAZIL |
| Tantalum | Mineracao Taboca S.A. | BRAZIL |
| Tantalum | Resind Industria e Comercio Ltda. | BRAZIL |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd. | CHINA |
| Tantalum | CMT Rare Metal Advanced Materials (Hunan) Co., Ltd. | CHINA |
| Tantalum | F&X Electro-Materials Ltd. | CHINA |
| Tantalum | FIR Metals & Resource Ltd. | CHINA |
| Tantalum | Guangdong Rising Rare Metals-EO Materials Ltd. | CHINA |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd. | CHINA |

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| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd. | CHINA |
| Tantalum | Jiangxi Tuohong New Raw Material | CHINA |
| Tantalum | Jiujiang Janny New Material 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 | Ningxia Orient Tantalum Industry Co., Ltd. | CHINA |
| Tantalum | RFH Recycling Metals Co., Ltd. | CHINA |
| Tantalum | RFH Yancheng Jinye New Material Technology Co., Ltd. | CHINA |
| Tantalum | V&D New Materials (Jiangsu) Co., Ltd. | CHINA |
| Tantalum | XIMEI RESOURCES (GUANGDONG) LIMITED | CHINA |
| Tantalum | XIMEI RESOURCES(GUIZHOU) TECHNOLOGY CO., LTD. | CHINA |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd. | CHINA |
| Tantalum | Yanling Jincheng Tantalum & Niobium Co., Ltd. | CHINA |
| Tantalum | NPM Silmet AS | ESTONIA |
| Tantalum | H.C. Starck Hermsdorf GmbH | GERMANY |
| Tantalum | QSIL Metals Hermsdorf GmbH | GERMANY |
| Tantalum | TANIOBIS GmbH | GERMANY |
| Tantalum | TANIOBIS Smelting GmbH & Co. KG | GERMANY |
| Tantalum | Metallurgical Products India Pvt., Ltd. | INDIA |
| Tantalum | Global Advanced Metals Aizu | JAPAN |
| Tantalum | Mitsui Mining and Smelting Co., Ltd. | JAPAN |
| Tantalum | Taki Chemical Co., Ltd. | JAPAN |
| Tantalum | TANIOBIS Japan Co., Ltd. | JAPAN |
| Tantalum | Ulba Metallurgical Plant JSC | KAZAKHSTAN |
| Tantalum | KEMET de Mexico | MEXICO |
| Tantalum | PowerX Ltd. | RWANDA |
| Tantalum | TANIOBIS Co., Ltd. | THAILAND |
| Tantalum | Avon Specialty Metals Ltd. | UNITED KINGDOM OF GREAT BRITAIN AND NORTHERN IRELAND |
| Tantalum | Smelter not listed | UNITED KINGDOM OF GREAT BRITAIN AND NORTHERN IRELAND |
| Tantalum | D Block Metals, LLC | UNITED STATES OF AMERICA |

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| Tantalum | Global Advanced Metals Boyertown | UNITED STATES OF AMERICA |
| Tantalum | Materion Newton Inc. | UNITED STATES OF AMERICA |
| Tantalum | QuantumClean | UNITED STATES OF AMERICA |
| Tantalum | Telex Metals | UNITED STATES OF AMERICA |
| Tin | Global Advanced Metals Greenbushes Pty Ltd. | AUSTRALIA |
| Tin | Aurubis Beerse | BELGIUM |
| Tin | EM Vinto | BOLIVIA (Plurinational State Of) |
| Tin | Operaciones Metalurgicas S.A. | BOLIVIA (Plurinational State of) |
| Tin | CRM Fundacao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda | BRAZIL |
| Tin | Estanho de Rondonia S.A. | BRAZIL |
| Tin | Magnu's Minerais Metais e Ligas Ltda. | BRAZIL |
| Tin | Mineracao Taboca S.A. | BRAZIL |
| Tin | Resind Industria e Comercio Ltda. | BRAZIL |
| Tin | Super Ligas | BRAZIL |
| Tin | TRATHO Metal Quimica | BRAZIL |
| Tin | White Solder Metalurgia e Mineracao Ltda. | BRAZIL |
| 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 | Gejiu Non-Ferrous Metal Processing 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 | Tin Smelting Branch of Yunnan Tin Co., Ltd. | CHINA |
| Tin | Yunnan Chengfeng Non-ferrous Metals Co., Ltd. | CHINA |
| Tin | Yunnan Yunfan Non-ferrous Metals Co., Ltd. | CHINA |
| Tin | Mining Minerals Resources SARL | CONGO, DEMOCRATIC REPUBLIC OF THE |
| Tin | Feinhutte Halsbrucke GmbH | GERMANY |
| Tin | Smelter not listed | GERMANY |
| Tin | CV Ayi Jaya | INDONESIA |

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| Tin | CV Venus Inti Perkasa | INDONESIA |
| 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 Bangka Serumpun | INDONESIA |
| Tin | PT Bangka Tin Industry | INDONESIA |
| Tin | PT Belitung Industri Sejahtera | INDONESIA |
| Tin | PT Bukit Timah | INDONESIA |
| Tin | PT Cipta Persada Mulia | INDONESIA |
| Tin | PT Menara Cipta Mulia | INDONESIA |
| Tin | PT Mitra Stania Prima | INDONESIA |
| Tin | PT Mitra Sukses Globalindo | INDONESIA |
| Tin | PT Premium Tin Indonesia | 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 Sukses Inti Makmur (SIM) | INDONESIA |
| Tin | PT Timah Tbk Kundur | INDONESIA |
| Tin | PT Timah Tbk Mentok | INDONESIA |
| Tin | PT Timah Nusantara | INDONESIA |
| Tin | PT Tinindo Inter Nusa | INDONESIA |
| Tin | PT Tommy Utama | INDONESIA |
| Tin | Dowa | JAPAN |
| Tin | Mitsubishi Materials Corporation | JAPAN |
| Tin | Takehara PVD Materials Plan / PVD Materials Division of MITSUI MINING & SMELTING CO., LTD. | JAPAN |
| Tin | Malaysia Smelting Corporation (MSC) | MALAYSIA |
| Tin | Malaysia Smelting Corporation Berhad (Port Klang) | MALAYSIA |
| Tin | DS Myanmar | MYANMAR |
| Tin | Minsur | PERU |
| Tin | O.M. Manufacturing Philippines, Inc. | PHILIPPINES |
| Tin | Fenix Metals | POLAND |
| Tin | Luna Smelter, Ltd. | RWANDA |
| Tin | Aurubis Berango | SPAIN |
| Tin | CRM Synergies | SPAIN |

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| Tin | Rui Da Hung | TAIWAN, PROVINCE OF CHINA |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd. | THAILAND |
| Tin | Thaisarco | THAILAND |
| Tin | Woodcross Smelting Company Limited | UGANDA |
| Tin | Alpha | UNITED STATES OF AMERICA |
| Tin | Metallic Resources, Inc. | UNITED STATES OF AMERICA |
| Tin | Tin Technology & Refining | UNITED STATES OF AMERICA |
| Tungsten | Wolfram Bergbau und Hutten AG | AUSTRIA |
| Tungsten | Cronimet Brasil Ltda | BRAZIL |
| Tungsten | China Molybdenum Tungsten Co., Ltd. | CHINA |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd. | CHINA |
| Tungsten | Fujian Xinlu Tungsten Co., Ltd. | CHINA |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd. | CHINA |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd. | CHINA |
| Tungsten | Ganzhou Sunny Non-Ferrous Metals Co., Ltd. | CHINA |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd. | CHINA |
| Tungsten | Hubei Green Tungsten Co., Ltd. | CHINA |
| Tungsten | Hunan Chenzhou Mining Co., Ltd. | CHINA |
| Tungsten | Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch | CHINA |
| 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 | Malipo Haiyu Tungsten Co., Ltd. | CHINA |
| Tungsten | Shinwon Tungsten (Fujian Shanghang) Co., Ltd. | CHINA |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd. | CHINA |
| Tungsten | Xiamen Tungsten Co., Ltd. | CHINA |
| Tungsten | H.C. Starck Tungsten GmbH | GERMANY |
| Tungsten | Plansee Composite Materials GmbH | GERMANY |
| Tungsten | TANIOBIS Smelting GmbH & Co. KG | GERMANY |
| Tungsten | A.L.M.T. Corp. | JAPAN |
| Tungsten | Japan New Metals Co., Ltd. | JAPAN |
| Tungsten | Philippine Bonway Manufacturing Industrial Corporation | PHILIPPINES |
| Tungsten | Philippine Chuangxin Industrial Co., Inc. | PHILIPPINES |

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| Tungsten | Lianyou Metals Co., Ltd. | TAIWAN, PROVINCE OF CHINA |
| Tungsten | Lianyou Resources Co., Ltd. | TAIWAN, PROVINCE OF CHINA |
| Tungsten | Avon Specialty Metals Ltd. | UNITED KINGDOM OF GREAT BRITAIN AND NORTHERN IRELAND |
| Tungsten | Global Tungsten & Powders LLC | UNITED STATES OF AMERICA |
| Tungsten | Kennametal Fallon | UNITED STATES OF AMERICA |
| Tungsten | Kennametal Huntsville | UNITED STATES OF AMERICA |
| Tungsten | Niagara Refining LLC | UNITED STATES OF AMERICA |
| Tungsten | Asia Tungsten Products Vietnam Ltd. | VIETNAM |
| Tungsten | Kenee Mining Corporation Vietnam | VIETNAM |
| Tungsten | Masan High-Tech Materials | VIETNAM |
| Tungsten | Tungsten Vietnam Joint Stock Company | VIETNAM |

TABLE 2

| Country | |
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| AUSTRALIA | SINGAPORE |
| AUSTRIA | SOUTH AFRICA |
| BELGIUM | SPAIN |
| BRAZIL | SWEDEN |
| CANADA | SWITZERLAND |
| CHILE | TAIWAN, PROVINCE OF CHINA |
| CHINA | TANZANIA, UNITED REPUBLIC OF |
| COLOMBIA | TURKEY |
| CZECHIA | UNITED STATES OF AMERICA |
| FRANCE | UZBEKISTAN |
| GERMANY | ESTONIA |
| INDIA | RWANDA |
| INDONESIA | THAILAND |
| ITALY | UNITED KINGDOM OF GREAT BRITAIN AND NORTHERN IRELAND |
| JAPAN | BOLIVIA (Plurinatioanal State Of) |
| KAZAKHSTAN | CONGO, Democratic Republic Of The |
| KOREA, REPUBLIC OF | MALAYSIA |
| MEXICO | MYANMAR |
| NETHERLANDS | PERU |
| PHILIPPINES | UGANDA |
| POLAND | VIETNAM |