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

Form SD
Specialized Disclosure Report

Analog Devices, Inc.
(Exact name of registrant as specified in its charter)

Massachusetts
(State or other jurisdiction of
incorporation or organization)

1-7819
(Commission File No.)

One Analog Way, Wilmington, MA
(Address of principal executive offices)

01887
(Zip Code)

Janene Asgeirsson
Chief Legal Officer and Corporate Secretary

781-329-4700

(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 ____ .
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Section 1 – Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

Conflict Minerals Disclosure

Analog Devices, Inc. has filed a Conflict Minerals Report (the Report) as Exhibit 1.01 hereto. The Report is publicly available at www.analog.com under the heading “Investor Relations.” The content of any website referred to in this Form SD and/or the Report is included for general information only and is not incorporated by reference in this Form SD and/or the Report.

Item 1.02 Exhibit

The Conflict Minerals Report for the reporting period from January 1 to December 31, 2024 is filed as Exhibit 1.01 to this Form SD.

Section 2 – Resource Extraction Issuer Disclosure

Item 2.01 Resource Extraction Issuer Disclosure and Report

Not applicable.

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.

Analog Devices, Inc.

(registrant)

/s/ Richard C. Puccio, Jr.

Richard C. Puccio, Jr.

Executive Vice President and Chief Financial Officer

Dated: May 23, 2025

CONFLICT MINERALS REPORT OF ANALOG DEVICES, INC. IN ACCORDANCE WITH RULE 13P-1 UNDER THE SECURITIES EXCHANGE ACT OF 1934 (UNAUDITED)

Section 1: Introduction

This is the Conflict Minerals Report of Analog Devices, Inc. (Analog Devices, ADI, we, our) for calendar year 2024 in accordance with Rule 13p-1 under the Securities Exchange Act of 1934 (Rule 13p-1). Numerous terms in this report are defined in Rule 13p-1 and Form SD and the reader is referred to those sources for such definitions and explanations thereof.

Products manufactured or contracted to be manufactured by Analog Devices may contain tantalum, tin, tungsten and/or gold (collectively, conflict minerals) that are necessary to the functionality or production of our products. Based on the reasonable country of origin inquiry (RCOI) described below, Analog Devices either knows that necessary conflict minerals originated in the Democratic Republic of the Congo or an adjoining country (collectively, Covered Countries) and are not from recycled or scrap sources, or has reason to believe that necessary conflict minerals may have originated in the Covered Countries and has reason to believe that they may not be from recycled or scrap sources. Accordingly, we undertook due diligence on the source and chain of custody of the necessary conflict minerals in our products, as described below. Analog Devices is many steps removed from the mining of the conflict minerals; we do not purchase raw ore or unrefined conflict minerals, and we do no purchasing in the Covered Countries. We either purchase conflict minerals indirectly from a smelter or refiner (SOR) for use in our manufacturing processes or purchase components from suppliers that incorporate conflict minerals. The mine or other point of origin of conflict minerals cannot be determined with any certainty once the raw ores are smelted, refined, and converted to ingots, bullion, or other conflict mineral-containing derivatives.

Analog Devices is a global semiconductor leader dedicated to solving our customers' most complex engineering challenges. We deliver innovations that connect technology to human breakthroughs and play a critical role at the intersection of the physical and digital worlds by providing the building blocks to sense, measure, interpret, connect, and power. We design, manufacture, test, and market a broad portfolio of solutions, including integrated circuits (ICs), software and subsystems that leverage high-performance analog, mixed-signal and digital signal processing technologies. Our comprehensive product portfolio, deep domain expertise and advanced manufacturing capabilities extend across high-performance precision and high-speed mixed-signal, power management and processing technologies – including data converters, amplifiers, power management, radio frequency (RF) ICs, edge processors and other sensors.

Section 2: Product Scope

We design, manufacture, test, and market a broad portfolio of solutions, including ICs, software and subsystems that leverage high-performance analog, mixed-signal and digital signal processing technologies. Our comprehensive solution portfolio, deep domain expertise and advanced manufacturing capabilities extend across high-performance precision and high-speed mixed-signal, power management and processing technologies – including data converters, amplifiers, power management, RF ICs, edge processors and other sensors. The scope of this report applies to semiconductor ICs, monolithic and multi-chip ICs, multi-component ICs, system-in-package modules/hybrid ICs, and other modules and assembled products. Our ICs are designed to address a wide range of real-world signal processing applications. We sell our ICs to customers worldwide, many of whom use products spanning our core technologies in a wide range of applications. Our IC product portfolio includes both general-purpose products used by a broad range of customers and applications, as well as application-specific products designed for specific target markets. By using readily available, high-performance, general-purpose products in their systems, our customers can reduce the time they need to bring new products to market. Given the high cost of developing more customized ICs, our standard products often provide a cost-effective solution for many low to medium volume applications. Our analog ICs monitor, condition, amplify or transform continuous analog signals associated with physical properties, such as temperature, light, sound, or motion, and play an important role in bridging real world phenomena to a variety of electronic systems. Our analog ICs also provide voltage regulation and power control to electronic systems. We also work with customers to design application-specific solutions. We begin with our existing core technologies, which leverage our analog and mixed signal, power management, RF and microwave, edge processors and other sensors, and devise solutions that more closely meet the needs of a specific customer or group of customers. In certain cases, because we have already developed the core technology platform for our general-purpose products, we can create application-specific solutions quickly and efficiently.

We produce and market a broad range of ICs and products and operate in one reportable segment based on the aggregation of our operating segments. The ICs sold by each of our operating segments are manufactured using similar semiconductor processes, package manufacturing processes and raw materials in either our own production facilities or by third-party wafer fabricators and package manufacturers.

Section 3: Reasonable Country of Origin Inquiry

Analog Devices engaged with our relevant suppliers to identify SORs in our supply chain. We define relevant suppliers as those who supply materials to Analog Devices that are known to contain any or all of the conflict minerals, where such conflict minerals are necessary to the functionality and/or production of our products. We reach out to our relevant suppliers to request conflict minerals sourcing information using the Responsible Minerals Initiative (RMI)'s Conflict Minerals Reporting Template (RMI CMRT). Information provided by our relevant suppliers is reviewed for completeness and reasonableness, based on our knowledge of the supplier. Further supplier engagement, as necessary, is undertaken for any additional actions regarding their submission, including but not limited to follow-up and escalation on the identified SORs.

Section 4: Due Diligence Framework

Analog Devices' due diligence measures are designed to conform, in all material respects, with the internationally recognized due diligence framework set forth in the Organisation for Economic Co-operation and Development (the OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition (OECD 2016) (the OECD Framework), including related supplements for each of the conflict minerals. Below is a description of our due diligence measures pursuant to the OECD Framework:

Step 1. Establish strong company management systems

- Analog Devices has adopted a policy regarding conflict minerals (Conflict Minerals Policy). The Conflict Minerals Policy is publicly available on our website and is a key component of our conflict minerals program. The Conflict Minerals Policy reflects ADI's commitment to ethical practices and compliance with applicable laws and regulations.
- An internal team supported by representatives from different internal groups is tasked to implement our Conflict Minerals Policy and oversee ADI's conflict minerals program (Conflict Minerals Oversight Committee). The Director of Quality, Product Stewardship, is the assigned team leader who reports through the quality organization to the Vice President, Global Quality and Product Engineering. The Conflict Minerals Oversight Committee reviews our conflict minerals program on a regular basis.
- We have adopted a process for identifying suppliers, SORs, or recyclers and scrap supplier sources of conflict minerals within the supply chain. ADI leverages the RMI CMRT to gather information regarding SORs from our first-tier suppliers. We also utilize the RMI and its Responsible Minerals Assurance Process (RMAP) to trace the mine of origin of the conflict minerals when such information is available. The RMI conducts independent audits of smelters and refiners to ensure that all certified smelters and refiners are Conformant¹ or actively engaged in the RMAP identification of upstream actors in the supply chain.
- We expect our direct suppliers to have policies and procedures in place that are in compliance with our Conflict Minerals Policy to enable transparency and facilitate our compliance with applicable programs and rules.
- As a participating member of the Responsible Business Alliance and the RMI, ADI utilizes these industry resources to support early risk awareness of issues that may impact SOR status.

Step 2. Identify and assess risk in the supply chain

The OECD Framework for managing risk is largely directed towards the upstream portion of the supply chain (SORs and mines of origin). As a downstream company in the supply chain, ADI participates in the RMAP under the RMI to identify and review the due diligence process of SORs in our supply chain. The RMI assesses and audits whether SORs adhere to RMAP standards, which meet the requirements of the OECD Framework. Compliant SORs are then designated as Conformant and listed as such on the RMI website. We request suppliers provide information regarding SORs in our supply chain by using the RMI CMRT. We review supplier responses to identify areas for further follow-up and key risks in our supply chain.

Step 3. Design and implement a strategy to respond to identified risks

We encourage suppliers who are sourcing from non-Conformant SORs to move towards using Conformant SORs (as identified via the RMI and other industry-developed third-party audit mechanisms). We contact SORs directly to support participation in the RMI and respond to the RMI's requests for information as they relate to SOR operational changes, audit requirements or SOR status. If a supplier fails to remedy the risks identified by review of SORs reported to ADI, and subsequent supplier or SOR engagement cannot yield resolution, the supplier status will be escalated for review by the Conflict Minerals Oversight Committee to take measures up to and including termination of our relationship with the supplier, if warranted.

¹ "Conformant" means that a SOR has successfully completed an assessment against the applicable RMAP standard or an equivalent cross-recognized assessment. Included smelters and refiners were not necessarily Conformant for all or part of 2024 and may not continue to be Conformant for any future period.

Step 4. Carry out independent third-party audit of supply chain due diligence at identified points in the supply chain

We rely on industry efforts, including the RMI, to conduct third-party audits of eligible SORs against the RMAP standards, which meet the OECD Framework for due diligence practices. As a member of the RMI, we utilize information from these RMAP audits as well as other recognized industry audits of SORs to validate SOR conformance.

Step 5. Report on supply chain due diligence

This report and the associated Form SD have been filed with the U.S. Securities and Exchange Commission (SEC) and are available on our website.

Section 5: Due Diligence Results

Tracing the conflict minerals we use in our SORs and country of origin of each such mineral is a complex endeavor, but an important aspect of responsible sourcing. To help establish and maintain our supply chain compliance sourcing program, we have followed currently established industry guidelines such as those developed by the RMI under the OECD Framework, which enables companies to source minerals from SORs that have been subjected to a rigorous, independent third-party audit.

To implement our RCOI survey process, we adopted the RMI's industry approach and leveraged the RMI CMRT to gather information from our first-tier suppliers to help us trace the origin of necessary conflict minerals used in our products by identifying SORs, recyclers and scrap supplier sources of conflict minerals. We also utilized the RMI and its RCOI investigation process and data to trace the mine of origin of conflict minerals when such information was available. The RMI conducts independent audits of SORs to ensure that all certified SORs are Conformant or actively engaged in the RMAP.

The responses from our suppliers listed 235 entities as SORs of conflict minerals in their supply chains. A recognized responsible minerals assurance process verified 232 of these entities as Conformant by the RMI. The following is a summary of SORs used by our suppliers by mineral type during calendar year 2024:

<u>Metal</u>	<u>Total SORs Identified⁽¹⁾</u>	<u>Conformant SORs</u>
Gold	97	95
Tantalum	42	42
Tin	57	57
Tungsten	39	38
Total	235	232

(1) SORs included in this table were identified to us by the suppliers. However, not all of the included SORs may have processed necessary conflict minerals contained in our products. Some suppliers may have reported to us SORs that were not in our supply chain due to over-inclusiveness in the information received from their suppliers as a result of reporting to us at a "company level," meaning that they reported to us the conflict minerals content contained in all of their products, not just the products they sold to us, or for other reasons.

After exercising the due diligence described above, Analog Devices concluded that some of its necessary conflict minerals originated in the Covered Countries. Analog Devices was unable to determine whether or not such conflict minerals directly or indirectly financed any armed group(s) in the Covered Countries.

Section 6: Other Matters

Based on the information provided by our suppliers through December 31, 2024, we believe that the facilities that may have been used to process conflict minerals in our products include the SORs listed in Annex I below.

Based on information provided by our suppliers and from the RCOI data from the RMI, we believe that the origin of the conflict minerals contained in our products may include the countries listed in Annex II below as well as recycled and scrap sources.

Analog Devices will undertake the following steps during the next compliance period to continue to improve the due diligence conducted and to further mitigate the risk that our necessary conflict minerals benefit armed groups in the Covered Countries:

- Continue to participate in industry initiatives, such as the RMI. We participate actively in the RMI's plenary sessions.
- Continue to contact SORs identified as a result of the RCOI process and request their participation in obtaining a "conformant" designation from an industry program such as the RMAP program or equivalent if they have not already done so.
- Strengthen our alternate sourcing strategy to transition out suppliers who fail to comply with our conflict minerals requirements.
- Collaborate with our procurement team by providing them with resources that will guide them in choosing the material suppliers containing any or all of the conflict minerals.
- Explore system improvements for our conflict minerals program.

This report includes forward-looking statements, within the meaning of the Private Securities Litigation Reform Act of 1995, which involve risks and uncertainties. Forward-looking statements provide current expectations of future events based on certain assumptions and include any statement that does not directly relate to any historical or current fact. Forward-looking statements can also be identified by words such as "expects," "plans," "intends," "will," "may," and similar terms. Forward-looking statements are not guarantees of future actions or performance. Analog Devices assumes no obligation to revise or update any forward-looking statements for any reason, except as required by law.

ANNEX I (1)

Metal	Standard Smelter Name	Smelter Country
Gold	Abington Reldan Metals, LLC*	United States of America
Gold	Advanced Chemical Company*	United States of America
Gold	Agosi AG*	Germany
Gold	Aida Chemical Industries Co., Ltd.*	Japan
Gold	Almalyk Mining and Metallurgical Complex (AMMC)*	Uzbekistan
Gold	AngloGold Ashanti Corrego do Sitio Mineracao*	Brazil
Gold	Argor-Heraeus S.A.*	Switzerland
Gold	Asahi Metalfine, Inc.*	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	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	Chimet S.p.A.*	Italy
Gold	Chugai Mining*	Japan
Gold	Coimpa Industrial LTDA*	Brazil
Gold	Dowa*	Japan
Gold	DSC (Do Sung Corporation)*	Korea, Republic of
Gold	Eco-System Recycling Co., Ltd. East Plant*	Japan
Gold	Eco-System Recycling Co., Ltd. North Plant*	Japan
Gold	Eco-System Recycling Co., Ltd. West Plant*	Japan
Gold	Elite Industech Co., Ltd.*	Taiwan
Gold	GG Refinery Ltd.*	Tanzania, United Republic of
Gold	Gold by Gold Colombia*	Colombia
Gold	Heimerle + Meule GmbH*	Germany
Gold	Heraeus Germany GmbH Co. KG*	Germany
Gold	Heraeus Metals Hong Kong Ltd.*	China
Gold	Impala Platinum - Base Metal Refinery (BMR)*	South Africa
Gold	Impala Platinum - Platinum Metals Refinery (PMR)**	South Africa
Gold	Impala Platinum - Rustenburg Smelter*	South Africa
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.*	Korea, Republic of
Gold	L'Orfebre S.A.*	Andorra
Gold	LS MnM Inc.*	Korea, Republic of
Gold	LT Metal Ltd.*	Korea, Republic of
Gold	Materion*	United States of America
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 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	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*	Korea, Republic of
Gold	Nihon Material Co., Ltd.*	Japan
Gold	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH*	Austria
Gold	Ohura Precious Metal Industry Co., Ltd.*	Japan
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	Remondis PMR B.V.*	Netherlands
Gold	Royal Canadian Mint*	Canada
Gold	SAFINA A.S.*	Czechia
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	Solar Applied Materials Technology Corp.*	Taiwan
Gold	Sumitomo Metal Mining Co., Ltd.*	Japan
Gold	SungEel HiMetal Co., Ltd.*	Korea, Republic of
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*	Korea, Republic of
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	Weerefining*	France
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	Zijin Mining Group Gold Smelting Co. Ltd.*	China
Tantalum	AMG Brasil*	Brazil
Tantalum	Avon Specialty Metals Ltd.*	United Kingdom of Great Britain and Northern Ireland
Tantalum	Changsha South Tantalum Niobium Co., Ltd.*	China
Tantalum	CMT Rare Metal Advanced Materials (Hunan) Co., Ltd.*	China
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	Guangdong Rising Rare Metals-EO Materials Ltd.*	China
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 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	KEMET de Mexico*	Mexico
Tantalum	Materion Newton Inc.*	United States of America
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	Plansee SE Reutte*	Austria
Tantalum	PowerX Ltd.*	Rwanda
Tantalum	QSIL Metals Hermsdorf GmbH*	Germany
Tantalum	QuantumClean*	United States of America
Tantalum	Resind Industria e Comercio Ltda.*	Brazil
Tantalum	RFH Recycling Metals Co., Ltd.*	China
Tantalum	RFH Yancheng Jinye New Material Technology Co., Ltd.*	China
Tantalum	Taki Chemical Co., Ltd.*	Japan
Tantalum	Taniobis Co., Ltd.*	Thailand
Tantalum	Taniobis GmbH*	Germany
Tantalum	Taniobis Japan Co., Ltd.*	Japan
Tantalum	Taniobis Smelting GmbH & Co. KG*	Germany
Tantalum	Telex Metals*	United States of America
Tantalum	Ulba Metallurgical Plant JSC*	Kazakhstan
Tantalum	V&D New Materials (Jiangsu) Co., Ltd.*	China
Tantalum	Ximei Resources (Guangdong) Limited*	China

Tantalum	Ximei Resources (Guizhou) Technology Co., Ltd.*	China
Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.*	China
Tin	Alpha Assembly Solutions Inc*	United States of America
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	CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda*	Brazil
Tin	CRM Synergies*	Spain
Tin	CV Ayi Jaya*	Indonesia
Tin	Dowa*	Japan
Tin	EM Vinto*	Bolivia
Tin	Estanho de Rondonia S.A.*	Brazil
Tin	Fabrica Auricchio Industria e Comercio Ltda.*	Brazil
Tin	Feinhutte Halsbrucke GmbH*	Germany
Tin	Fenix Metals*	Poland
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.*	China
Tin	Global Advanced Metals Greenbushes Pty Ltd.*	Australia
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	Magnu's Minerais Metais e Ligas Ltda.*	Brazil
Tin	Malaysia Smelting Corporation (MSC)*	Malaysia
Tin	Malaysia Smelting Corporation Berhad (Port Klang)*	Malaysia
Tin	Metallic Resources, Inc.*	United States of America
Tin	Mineracao Taboca S.A.*	Brazil
Tin	Mining Minerals Resources SARL*	Congo, democratic republic of the
Tin	Minsur*	Peru
Tin	Mitsubishi Materials Corporation*	Japan
Tin	O.M. Manufacturing (Thailand) Co., Ltd.*	Thailand
Tin	O.M. Manufacturing Philippines, Inc.*	Philippines
Tin	Operaciones Metalurgicas S.A.*	Bolivia (plurinational state of)
Tin	Precious Minerals and Smelting Limited*	India
Tin	PT ATD Makmur Mandiri Jaya*	Indonesia
Tin	PT Bangka Prima Tin*	Indonesia
Tin	PT Cipta Persada 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 Rajehan Ariq*	Indonesia
Tin	PT Timah Tbk Kundur*	Indonesia
Tin	PT Timah Tbk Mentok*	Indonesia

Tin	Resind Industria e Comercio Ltda.*	Brazil
Tin	Rui Da Hung*	Taiwan
Tin	Soft Metais Ltda.*	Brazil
Tin	Super Ligas*	Brazil
Tin	Takehara PVD Materials Plant / PVD Materials Division of Mitsui Mining & Smelting Co., Ltd.*	Japan
Tin	Thaisarco*	Thailand
Tin	Tin Smelting Branch of Yunnan Tin Co., Ltd.*	China
Tin	Tin Technology & Refining*	United States of America
Tin	TRATHO Metal Quimica*	Brazil
Tin	White Solder Metalurgia e Mineracao Ltda.*	Brazil
Tin	Woodcross Smelting Company Limited*	Uganda
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.*	China
Tin	Yunnan Yunfan Non-ferrous Metals Co., Ltd.*	China
Tungsten	A.L.M.T. Corp.*	Japan
Tungsten	Asia Tungsten Products Vietnam Ltd.*	Vietnam
Tungsten	Avon Specialty Metals Ltd.*	United Kingdom of Great Britain and Northern Ireland
Tungsten	China Molybdenum Tungsten Co., Ltd.*	China
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.*	China
Tungsten	Cronimet Brasil Ltda*	Brazil
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	Global Tungsten & Powders LLC*	United States of America
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.*	China
Tungsten	H.C. Starck Tungsten GmbH*	Germany
Tungsten	Hubei Green Tungsten 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
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	Kenee Mining Vietnam Company Limited*	Vietnam
Tungsten	Kennametal Fallon*	United States of America
Tungsten	Kennametal Huntsville*	United States of America
Tungsten	Lianyou Metals Co., Ltd.*	Taiwan
Tungsten	Lianyou Resources Co., Ltd.*	Taiwan
Tungsten	Malipo Haiyu Tungsten Co., Ltd.*	China
Tungsten	Masan High-Tech Materials*	Vietnam
Tungsten	Niagara Refining LLC*	United States of America
Tungsten	Philippine Bonway Manufacturing Industrial Corporation*	Philippines
Tungsten	Philippine Carreytech Metal Corp.**	Philippines
Tungsten	Philippine Chuangxin Industrial Co., Inc.*	Philippines

Tungsten	Plansee Composite Materials GmbH*	Germany
Tungsten	Shinwon Tungsten (Fujian Shanghang) Co., Ltd.*	China
Tungsten	Taniobis Smelting GmbH & Co. KG*	Germany
Tungsten	Tungsten Vietnam Joint Stock Company*	Vietnam
Tungsten	Wolfram Bergbau und Hutten AG*	Austria
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.*	China
Tungsten	Xiamen Tungsten Co., Ltd.*	China

* Smelter name included in the RMAP Conformant Smelters and Refiners as of December 31, 2024.

** Smelter name included in the RMI Active Smelters and Refiners List as of December 31, 2024.

(1) We note the following in connection with the information contained in the foregoing list:

- a) SORs listed above were identified to us by the suppliers. However, not all of the included SORs may have processed necessary conflict minerals contained in our products. Some suppliers may have reported to us SORs that were not in our supply chain due to over-inclusiveness in the information received from their suppliers as a result of reporting to us at a “company level,” meaning that they reported to us the conflict minerals content contained in all of their products, not just the products they sold to us, or for other reasons.
- b) The compliance status and country location reflected in the list is based solely on information made available by the RMI to its members, without independent verification by us.
- c) Country Location is the location of the smelter or refiner and is based solely on information made publicly available by RMI, without independent verification by us.

ANNEX II

Albania
Algeria
Andora
Angola
Antigua and Barbuda
Argentina
Australia
Austria
Azerbaijan
Bahamas
Bangladesh
Barbados
Belarus
Belgium
Benin
Bolivia
Bolivia (Plurinational State of)
Bosnia and Herzegovina
Botswana
Brazil
Bulgaria
Burkina Faso
Burundi
Cambodia

Cameroon
Canada
Cayman Island
Chile
China
Colombia
Congo, Democratic Republic of the
Costa Rica
Côte d'Ivoire
Croatia
Curacao
Czech Republic
Denmark
Dominican Republic
Ecuador
Egypt
El Salvador
Estonia
Eswatini
Ethiopia
Fiji
Finland
France
French Guiana
Georgia
Germany
Ghana
Greece
Grenada
Guatemala
Guinea
Guyana
Honduras
Hong Kong
Hungary
Iceland
India
Indonesia
Ireland
Israel
Italy
Jamaica
Japan
Jordan
Kazakhstan
Kenya
Korea, Republic of

Kuwait
Kyrgyzstan
Lao People's Democratic Republic
Laos
Latvia
Lebanon
Liberia
Liechtenstein
Lithuania
Luxembourg
Macao
Madagascar
Malaysia
Mali
Malta
Mauritania
Mexico
Moldova, Republic of
Mongolia
Morocco
Mozambique
Myanmar
Namibia
Netherlands
New Zealand
Nicaragua
Niger
Nigeria
Norway
Oman
Panama
Papua New Guinea
Peru
Philippines
Poland
Portugal
Puerto Rico
Romania
Russia
Rwanda
Saint Kitts and Nevis
Saint Vincent and Grenadines
Saudi Arabia
Senegal
Serbia
Sierra Leone
Singapore

Sint Maarten
Solomon Islands
Slovakia
Slovenia
South Africa
South Korea
Spain
Sri Lanka
Sudan
Suriname
Sweden
Switzerland
Taiwan
Tajikistan
Tanzania
Thailand
Timore-Leste
Togo
Trinidad and Tobago
Tunisia
Turkey
Uganda
Ukraine
United Arab Emirates
United Kingdom
United Kingdom of Great Britain and Northern Ireland
United States of America
Uruguay
Uzbekistan
Venezuela
Vietnam
Zambia
Zimbabwe