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

**FORM SD**

**SPECIALIZED DISCLOSURE REPORT**

***ClearOne.***

**CLEARONE, INC.**

(Exact name of registrant as specified in its charter)

**Utah**

(State or other jurisdiction of incorporation)

**001-33660**

(Commission File Number)

**87-0398877**

(I.R.S. employer identification number)

**5225 Wiley Post Way, Suite 500, Salt Lake City, Utah**

(Address of principal executive offices)

**84116**

(Zip Code)

**Narsi Narayanan, Senior Vice President of Finance**

**(801) 975-7200**

(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, 2016.

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## **Section 1 - Conflict Minerals Disclosure**

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

#### *Company Overview*

ClearOne, Inc. (ClearOne) is a global company that designs, develops and sells conferencing, collaboration, streaming and digital signage solutions for voice and visual communications.

#### *Conflict Minerals Disclosure*

ClearOne has concluded that products it manufactures or contracts to manufacture contain conflict minerals, defined by Section 1502(e)(4) of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (“the Act”) as gold, columbite-tantalite (coltan), cassiterite, and wolframite, including their derivatives which are limited to tantalum, tin and tungsten. As a result of such conclusion, ClearOne conducted a reasonable country of origin inquiry designed to determine if the conflict minerals in its products originated in the Democratic Republic of Congo (“DRC”) or the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia or Angola (an “Adjoining Country”) or are from recycled or scrap resources. Based on this reasonable country of origin inquiry, ClearOne has concluded that a portion of its products contain conflict minerals, that originated from the DRC or an Adjoining Country that may not be solely from recycled or scrap sources, and has concluded in good faith that such conflict minerals are “DRC conflict undeterminable”. A description of the Company’s reasonable country of origin inquiry to determine whether any necessary conflict minerals in the Company’s products originated in the DRC or an Adjoining Country, the due diligence performed and ClearOne’s determinations are included in the Conflict Minerals Report, which is attached to this Form SD as Exhibit 1.01.

A copy of ClearOne’s Conflict Minerals Report is also publicly available on ClearOne’s website at:  
<http://investors.clearone.com/sec.cfm>

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

A copy of the Conflict Minerals Report required by Item 1.01 is filed as Exhibit 1.01 and is incorporated by reference.

## **Section 2 - Exhibits**

### **Item 2.01 Exhibits**

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

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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.

ClearOne, Inc.,  
(Registrant)

May 31, 2017

By: /s/ Zeynep Hakimoglu  
Zeynep Hakimoglu  
Chief Executive Officer  
(Principal Executive Officer)

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**ClearOne, Inc.**  
**Conflict Minerals Report**  
**For the Year Ended December 31, 2016**

*Company Overview*

ClearOne, Inc. (ClearOne) is a global company that designs, develops and sells conferencing, collaboration, streaming and digital signage products for voice and visual communications.

*Conflict Minerals Disclosure*

ClearOne has concluded that products it manufactures or contracts to manufacture contain conflict minerals, defined by Section 1502(e)(4) of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (“the Act”) as gold, columbite-tantalite (coltan), cassiterite, and wolframite, including their derivatives which are limited to tantalum, tin, and tungsten. As a result of such conclusion, ClearOne conducted a reasonable country of origin inquiry designed to determine if the conflict minerals in its products originated in the Democratic Republic of Congo (“DRC”) or the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia or Angola (an “Adjoining Country”) or are from recycled or scrap resources. In conducting due diligence, ClearOne applied guidance from the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, an internationally recognized due diligence framework.

ClearOne has performed a reasonable country of origin inquiry, which included the following procedures:

- Determining which conflict minerals are necessary to the functionality or production of a product manufactured or contracted to be manufactured by ClearOne worldwide;
- Questionnaires were drafted and sent to all current suppliers requiring identification of any conflict minerals from the DRC or an Adjoining Country;
- Upon receipt from suppliers, all questionnaires were reviewed to determine whether conflict minerals were from the DRC or an Adjoining Country;
- Follow-up was conducted with slow-to-respond suppliers, distributors and resellers; and
- To the extent possible, a search of certain publicly available information was performed.

ClearOne has determined in good faith that for calendar year 2016, as a result of its due diligence efforts, that a portion of its products contain conflict minerals originating in the DRC or an Adjoining Country and knows or has reason to believe that those conflict minerals may not be solely from recycled or scrap sources. ClearOne has also concluded in good faith that during this reporting period, the necessary conflict materials contained in our products that originated or may have originated from the Covered Countries are “DRC conflict undeterminable.” ClearOne was unable to determine whether the conflict minerals financed or benefited armed groups. A listing of known smelters identified by ClearOne suppliers, who supply materials for ClearOne’s conferencing, collaboration, streaming and digital signage solutions for voice and visual communications, is included in Annex I.

In the next compliance period, ClearOne intends to continue gathering the information and improve due diligence measures and further mitigate the risk that its necessary conflict minerals do not benefit armed groups, including but not limited to (i) continuing to engage with suppliers to obtain current, accurate and complete information about the supply chain; and (ii) encourage suppliers to implement responsible sourcing and to have them encourage smelters and refiners to obtain a “conflict-free” designation from an independent third-party auditor.

This Conflict Minerals Report was not subject to an independent private sector audit, as such an audit was not required.

A copy of this Conflict Minerals report is publicly available on ClearOne’s website at:

<http://investors.clearone.com/sec.cfm>

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## ANNEX I

| Mineral | Smelter Name                                                  | Location                 |
|---------|---------------------------------------------------------------|--------------------------|
| Gold    | Abington Reldan Metals, LLC                                   | UNITED STATES OF AMERICA |
| Gold    | Advanced Chemical Company                                     | UNITED STATES OF AMERICA |
| Gold    | Aida Chemical Industries Co., Ltd.                            | JAPAN                    |
| Gold    | Al Etihad Gold Refinery DMCC                                  | UNITED ARAB EMIRATES     |
| Gold    | Allgemeine Gold-und Silberscheideanstalt A.G.                 | GERMANY                  |
| Gold    | Almalyk Mining and Metallurgical Complex (AMMC)               | UZBEKISTAN               |
| Gold    | AngloGold Ashanti Córrego do Sítio Mineração                  | BRAZIL                   |
| Gold    | Argor-Heraeus S.A.                                            | SWITZERLAND              |
| Gold    | Asahi Pretec Corp.                                            | JAPAN                    |
| Gold    | Asahi Refining Canada Ltd.                                    | CANADA                   |
| Gold    | Asahi Refining USA Inc.                                       | UNITED STATES OF AMERICA |
| Gold    | Asaka Riken Co., Ltd.                                         | JAPAN                    |
| Gold    | Atasay Kuyumculuk Sanayi Ve Ticaret A.S.                      | TURKEY                   |
| Gold    | AU Traders and Refiners                                       | SOUTH AFRICA             |
| Gold    | AURA-II                                                       | UNITED STATES OF AMERICA |
| Gold    | Aurubis AG                                                    | GERMANY                  |
| Gold    | Bangalore Refinery                                            | INDIA                    |
| Gold    | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | PHILIPPINES              |
| Gold    | Bauer Walser AG                                               | GERMANY                  |
| Gold    | Boliden AB                                                    | SWEDEN                   |
| Gold    | C. Hafner GmbH + Co. KG                                       | GERMANY                  |
| Gold    | Caridad                                                       | MEXICO                   |
| Gold    | CCR Refinery - Glencore Canada Corporation                    | CANADA                   |
| Gold    | Cendres + Métaux S.A.                                         | SWITZERLAND              |
| Gold    | Chimet S.p.A.                                                 | ITALY                    |
| Gold    | Chugai Mining                                                 | JAPAN                    |
| Gold    | Daejin Indus Co., Ltd.                                        | KOREA (REPUBLIC OF)      |
| Gold    | Danyang Huaxing Metal Material Co. Ltd                        | CHINA                    |
| Gold    | Daye Non-Ferrous Metals Mining Ltd.                           | CHINA                    |
| Gold    | Degussa Sonne / Mond Goldhandel GmbH                          | GERMANY                  |
| Gold    | DODUCO GmbH                                                   | GERMANY                  |
| Gold    | Dowa                                                          | JAPAN                    |
| Gold    | DSC (Do Sung Corporation)                                     | KOREA (REPUBLIC OF)      |
| Gold    | Eco-System Recycling Co., Ltd.                                | JAPAN                    |
| Gold    | Elemetal Refining, LLC                                        | UNITED STATES            |
| Gold    | Emirates Gold                                                 | UNITED ARAB EMIRATES     |
| Gold    | Emirates Gold DMCC                                            | UNITED ARAB EMIRATES     |
| Gold    | Faggi Enrico S.p.A.                                           | ITALY                    |
| Gold    | Fidelity Printers and Refiners Ltd.                           | ZIMBABWE                 |
| Gold    | Gansu Seemine Material Hi-Tech Co., Ltd.                      | CHINA                    |
| Gold    | Geib Refining Corporation                                     | UNITED STATES OF AMERICA |
| Gold    | Great Wall Precious Metals Co., Ltd. of CBPM                  | CHINA                    |
| Gold    | Guangdong Jinding Gold Limited                                | CHINA                    |
| Gold    | Gujarat Gold Centre                                           | INDIA                    |
| Gold    | Guoda Safina High-Tech Environmental Refinery Co., Ltd.       | CHINA                    |
| Gold    | Hangzhou Fuchunjiang Smelting Co., Ltd.                       | CHINA                    |
| Gold    | Heesung Metal                                                 | KOREA, REPUBLIC OF       |
| Gold    | Heimerle + Meule GmbH                                         | GERMANY                  |
| Gold    | Henan Yuguang Gold & Lead Co., Ltd.                           | CHINA                    |
| Gold    | Heraeus Ltd. Hong Kong                                        | CHINA                    |
| Gold    | Heraeus Precious Metals GmbH & Co. KG                         | GERMANY                  |

|      |                                                                             |                          |
|------|-----------------------------------------------------------------------------|--------------------------|
| Gold | Hunan Chenzhou Mining Co., Ltd.                                             | CHINA                    |
| Gold | HwaSeong CJ Co., Ltd.                                                       | KOREA (REPUBLIC OF)      |
| 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 | Japan Mint                                                                  | JAPAN                    |
| Gold | Jiangxi Copper Co., Ltd.                                                    | CHINA                    |
| Gold | Jinchang                                                                    | TAIWAN                   |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant                         | RUSSIAN FEDERATION       |
| Gold | JSC Uralelectromed                                                          | RUSSIAN FEDERATION       |
| Gold | JX Nippon Mining & Metals Co., Ltd.                                         | JAPAN                    |
| Gold | K.A Rasmussen as                                                            | NORWAY                   |
| Gold | Kaloti Precious Metals                                                      | UNITED ARAB EMIRATES     |
| Gold | Kazakhmys Smelting LLC                                                      | KAZAKHSTAN               |
| Gold | Kazzinc                                                                     | KAZAKHSTAN               |
| Gold | Kennecott Utah Copper LLC                                                   | UNITED STATES            |
| Gold | KGHM Polska Miedź Spółka Akcyjna                                            | POLAND                   |
| Gold | Kojima Chemicals Co., Ltd.                                                  | JAPAN                    |
| Gold | Korea Metal Co., Ltd.                                                       | KOREA, REPUBLIC OF       |
| Gold | Korea Zinc Co., Ltd.                                                        | KOREA (REPUBLIC OF)      |
| Gold | Kyrgyzaltyn JSC                                                             | KYRGYZSTAN               |
| Gold | Kyshym Copper-Electrolytic Plant ZAO                                        | RUSSIAN FEDERATION       |
| Gold | L'azurde Company For Jewelry                                                | SAUDI ARABIA             |
| Gold | Lingbao Gold Co., Ltd.                                                      | CHINA                    |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd.                                  | CHINA                    |
| Gold | LS-NIKKO Copper Inc.                                                        | KOREA (REPUBLIC OF)      |
| Gold | Luoyang Zijin Yinhui Gold Refinery Co., Ltd.                                | CHINA                    |
| Gold | Materion                                                                    | UNITED STATES OF AMERICA |
| Gold | Matsuda Sangyo Co., Ltd.                                                    | JAPAN                    |
| Gold | Metalor Technologies (Hong Kong) Ltd.                                       | CHINA                    |
| Gold | Metalor Technologies (Singapore) Pte., Ltd.                                 | SINGAPORE                |
| Gold | Metalor Technologies (Suzhou) Ltd.                                          | CHINA                    |
| Gold | Metalor Technologies S.A.                                                   | SWITZERLAND              |
| Gold | Metalor USA Refining Corporation                                            | UNITED STATES            |
| Gold | Metalúrgica Met-Mex Peñoles S.A. De C.V.                                    | MEXICO                   |
| Gold | Mitsubishi Materials Corporation                                            | JAPAN                    |
| Gold | Mitsui Mining and Smelting Co., Ltd.                                        | JAPAN                    |
| Gold | MMTC-PAMP India Pvt., Ltd.                                                  | INDIA                    |
| Gold | Modeltech Sdn Bhd                                                           | MALAYSIA                 |
| Gold | Morris and Watson                                                           | NEW ZEALAND              |
| Gold | Moscow Special Alloys Processing Plant                                      | RUSSIAN FEDERATION       |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.Ş.                                      | TURKEY                   |
| Gold | Navoi Mining and Metallurgical Combinat                                     | UZBEKISTAN               |
| Gold | Nihon Material Co., Ltd.                                                    | JAPAN                    |
| Gold | Ögussa Österreichische Gold- und Silber-Scheideanstalt GmbH                 | AUSTRIA                  |
| Gold | Ohura Precious Metal Industry Co., Ltd.                                     | JAPAN                    |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | RUSSIAN FEDERATION       |
| Gold | OJSC Kolyma Refinery                                                        | RUSSIAN FEDERATION       |
| Gold | OJSC Novosibirsk Refinery                                                   | RUSSIAN FEDERATION       |
| Gold | PAMP S.A.                                                                   | SWITZERLAND              |
| Gold | Penglai Penggang Gold Industry Co., Ltd.                                    | CHINA                    |
| Gold | Prioksky Plant of Non-Ferrous Metals                                        | RUSSIAN FEDERATION       |
| Gold | PT Aneka Tambang (Persero) Tbk                                              | INDONESIA                |
| Gold | PX Précinox S.A.                                                            | SWITZERLAND              |
| Gold | Rand Refinery (Pty) Ltd.                                                    | SOUTH AFRICA             |
| Gold | Remondis Argentia B.V.                                                      | Netherlands              |
| Gold | Republic Metals Corporation                                                 | UNITED STATES OF AMERICA |

|          |                                                         |                           |
|----------|---------------------------------------------------------|---------------------------|
| Gold     | Royal Canadian Mint                                     | CANADA                    |
| Gold     | SAAMP                                                   | FRANCE                    |
| Gold     | Sabin Metal Corp.                                       | UNITED STATES OF AMERICA  |
| Gold     | SAFINA A.S.                                             | CZECH REPUBLIC            |
| Gold     | Sai Refinery                                            | INDIA                     |
| Gold     | Samduck Precious Metals                                 | KOREA (REPUBLIC OF)       |
| Gold     | SAMWON METALS Corp.                                     | KOREA (REPUBLIC OF)       |
| Gold     | SAXONIA Edelmetalle GmbH                                | GERMANY                   |
| Gold     | Schone Edelmetaal B.V.                                  | NETHERLANDS               |
| Gold     | SEMPSA Joyería Platería S.A.                            | SPAIN                     |
| Gold     | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | CHINA                     |
| Gold     | Shandong Yanggu Xiangguang Co. Ltd.                     | CHINA                     |
| Gold     | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.       | CHINA                     |
| Gold     | Sichuan Tianze Precious Metals Co., Ltd.                | CHINA                     |
| Gold     | Singway Technology Co., Ltd.                            | TAIWAN, PROVINCE OF CHINA |
| Gold     | Smelter Not Listed                                      | TAIWAN                    |
| Gold     | Smelter Not Listed                                      |                           |
| Gold     | So Accurate Group, Inc.                                 | UNITED STATES OF AMERICA  |
| Gold     | SOE Shyolkovsky Factory of Secondary Precious Metals    | RUSSIAN FEDERATION        |
| Gold     | Solar Applied Materials Technology Corp.                | TAIWAN, PROVINCE OF CHINA |
| Gold     | Sudan Gold Refinery                                     | SUDAN                     |
| Gold     | Sumitomo Metal Mining Co., Ltd.                         | JAPAN                     |
| Gold     | Super Dragon Technology Co., Ltd.                       | CHINA                     |
| Gold     | T.C.A S.p.A                                             | ITALY                     |
| Gold     | Tanaka Kikinzoku Kogyo K.K.                             | JAPAN                     |
| Gold     | The Refinery of Shandong Gold Mining Co., Ltd.          | CHINA                     |
| Gold     | Tokuriki Honten Co., Ltd.                               | JAPAN                     |
| Gold     | Tongling Nonferrous Metals Group Co., Ltd.              | CHINA                     |
| Gold     | Tony Goetz NV                                           | BELGIUM                   |
| Gold     | TOO Tau-Ken-Altyn                                       | KAZAKHSTAN                |
| Gold     | Torecom                                                 | KOREA (REPUBLIC OF)       |
| Gold     | Umicore Brasil Ltda.                                    | BRAZIL                    |
| Gold     | Umicore Precious Metals Thailand                        | THAILAND                  |
| Gold     | Umicore S.A. Business Unit Precious Metals Refining     | BELGIUM                   |
| Gold     | United Precious Metal Refining, Inc.                    | UNITED STATES OF AMERICA  |
| Gold     | Universal Precious Metals Refining Zambia               | ZAMBIA                    |
| Gold     | Valcambi S.A.                                           | SWITZERLAND               |
| Gold     | Western Australian Mint trading as The Perth Mint       | AUSTRALIA                 |
| Gold     | WIELAND Edelmetalle GmbH                                | GERMANY                   |
| Gold     | YAMAMOTO PRECIOUS METAL CO., LTD.                       | JAPAN                     |
| Gold     | Yokohama Metal Co., Ltd.                                | JAPAN                     |
| Gold     | Yunnan Copper Industry Co., Ltd.                        | CHINA                     |
| Gold     | Zhongkuang Gold Industry Limited Company                | CHINA                     |
| Gold     | Zhongyuan Gold Smelter of Zhongjin Gold Corporation     | CHINA                     |
| Gold     | Zijin Mining Group Co., Ltd. Gold Refinery              | CHINA                     |
| Tantalum | Advanced Metallurgical Group N.V.                       | UNITED STATES OF AMERICA  |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd.               | CHINA                     |
| Tantalum | Conghua Tantalum and Niobium Smeltry                    | CHINA                     |
| Tantalum | D Block Metals, LLC                                     | UNITED STATES OF AMERICA  |
| Tantalum | Duoluoshan                                              | CHINA                     |
| Tantalum | E.S.R. Electronics                                      | UNITED STATES OF AMERICA  |
| Tantalum | Exotech Inc.                                            | 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 Zhiyuan New Material Co., Ltd.             | CHINA                                       |
| Tantalum | Guizhou Zhenhua Xinyun Technology Ltd., Kaili branch | CHINA                                       |
| Tantalum | H.C. Starck Co., Ltd.                                | THAILAND                                    |
| Tantalum | H.C. Starck GmbH Goslar                              | GERMANY                                     |
| Tantalum | H.C. Starck GmbH Laufenburg                          | GERMANY                                     |
| Tantalum | H.C. Starck Hermsdorf GmbH                           | GERMANY                                     |
| Tantalum | H.C. Starck Inc.                                     | UNITED STATES OF AMERICA                    |
| Tantalum | H.C. Starck Ltd.                                     | JAPAN                                       |
| Tantalum | H.C. Starck Smelting GmbH & Co. KG                   | GERMANY                                     |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd.    | CHINA                                       |
| Tantalum | Hi-Temp Specialty Metals, Inc.                       | UNITED STATES OF AMERICA                    |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd.         | CHINA                                       |
| Tantalum | Jiangxi Tuohong New Raw Material                     | CHINA                                       |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd.          | CHINA                                       |
| Tantalum | Jiujiang Tanbre Co., Ltd.                            | CHINA                                       |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd.        | CHINA                                       |
| Tantalum | KEMET Blue Metals                                    | MEXICO                                      |
| Tantalum | Kemet Blue Powder                                    | UNITED STATES OF AMERICA                    |
| Tantalum | King-Tan Tantalum Industry Ltd.                      | CHINA                                       |
| Tantalum | LSM Brasil S.A.                                      | BRAZIL                                      |
| Tantalum | Metallurgical Products India Pvt., Ltd.              | INDIA                                       |
| Tantalum | Mineração Taboca S.A.                                | BRAZIL                                      |
| Tantalum | Mitsui Mining and Smelting Co., Ltd.                 | JAPAN                                       |
| Tantalum | Molycorp Silmet A.S.                                 | ESTONIA                                     |
| Tantalum | Ningxia Nonferrous Metals Smeltery                   | CHINA                                       |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd.           | CHINA                                       |
| Tantalum | Plansee                                              | AUSTRIA                                     |
| Tantalum | Plansee SE Liezen                                    | AUSTRIA                                     |
| Tantalum | Plansee SE Reutte                                    | AUSTRIA                                     |
| Tantalum | Power Resources Ltd.                                 | MACEDONIA (THE FORMER YUGOSLAV REPUBLIC OF) |
| Tantalum | QuantumClean                                         | UNITED STATES OF AMERICA                    |
| Tantalum | Resind Indústria e Comércio Ltda.                    | BRAZIL                                      |
| Tantalum | RFH Tantalum Smeltry Co., Ltd.                       | CHINA                                       |
| Tantalum | Solikamsk Magnesium Works OAO                        | RUSSIAN FEDERATION                          |
| Tantalum | Taki Chemical Co., Ltd.                              | JAPAN                                       |
| Tantalum | Telex Metals                                         | UNITED STATES OF AMERICA                    |
| Tantalum | Tranzact, Inc.                                       | UNITED STATES OF AMERICA                    |
| Tantalum | Ulba Metallurgical Plant JSC                         | KAZAKHSTAN                                  |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd.        | CHINA                                       |
| Tantalum | Yichun Jin Yang Rare Metal Co., Ltd.                 | CHINA                                       |
| Tantalum | Zhuzhou Cemented Carbide Group Co., Ltd.             | CHINA                                       |
| Tin      | Alpha                                                | UNITED STATES OF AMERICA                    |
| Tin      | An Thai Minerals Co., Ltd.                           | VIET NAM                                    |
| Tin      | An Vinh Joint Stock Mineral Processing Company       | VIET NAM                                    |
| Tin      | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.    | CHINA                                       |
| Tin      | China Tin Group Co., Ltd.                            | CHINA                                       |
| Tin      | CINTAS METALICAS S.A.                                | SPAIN                                       |
| Tin      | CNMC (Guangxi) PGMA Co., Ltd.                        | CHINA                                       |
| Tin      | Cooperativa Metalurgica de Rondônia Ltda.            | BRAZIL                                      |
| Tin      | CV Ayi Jaya                                          | INDONESIA                                   |
| Tin      | CV Dua Sekawan                                       | INDONESIA                                   |
| Tin      | CV Gita Pesona                                       | INDONESIA                                   |
| Tin      | CV Serumpun Sebalai                                  | INDONESIA                                   |
| Tin      | CV Tiga Sekawan                                      | INDONESIA                                   |
| Tin      | CV United Smelting                                   | INDONESIA                                   |

|     |                                                                                       |                                  |
|-----|---------------------------------------------------------------------------------------|----------------------------------|
| Tin | CV Venus Inti Perkasa                                                                 | INDONESIA                        |
| Tin | Dowa                                                                                  | JAPAN                            |
| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | VIET NAM                         |
| Tin | Elmet S.L.U.                                                                          | SPAIN                            |
| Tin | EM Vinto                                                                              | BOLIVIA (PLURINATIONAL STATE OF) |
| Tin | Estanho de Rondônia S.A.                                                              | BRAZIL                           |
| Tin | Feinhütte Halsbrücke GmbH                                                             | GERMANY                          |
| Tin | Fenix Metals                                                                          | POLAND                           |
| Tin | Gejiu Fengming Metallurgy Chemical Plant                                              | CHINA                            |
| Tin | Gejiu Jinye Mineral Company                                                           | CHINA                            |
| Tin | Gejiu Kai Meng Industry and Trade LLC                                                 | CHINA                            |
| Tin | Gejiu Non-Ferrous Metal Processing Co., Ltd.                                          | CHINA                            |
| Tin | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.                                        | CHINA                            |
| Tin | Gejiu Zili Mining And Metallurgy Co., Ltd.                                            | CHINA                            |
| Tin | Guanyang Guida Nonferrous Metal Smelting Plant                                        | CHINA                            |
| Tin | Hayes Metals                                                                          | NEW ZEALAND                      |
| Tin | Hongqiao Metals (Kunshan) Co., Ltd.                                                   | CHINA                            |
| Tin | HuiChang Hill Tin Industry Co., Ltd.                                                  | CHINA                            |
| Tin | Huichang Jinshunda Tin Co., Ltd.                                                      | CHINA                            |
| Tin | Jiangmen Huayuan Industry Co. Ltd                                                     | CHINA                            |
| Tin | Jiangxi Ketai Advanced Material Co., Ltd.                                             | CHINA                            |
| Tin | Linwu Xianggui Ore Smelting Co., Ltd.                                                 | CHINA                            |
| Tin | Magnu's Minerais Metais e Ligas Ltda.                                                 | BRAZIL                           |
| Tin | Malaysia Smelting Corporation (MSC)                                                   | MALAYSIA                         |
| Tin | Melt Metais e Ligas S.A.                                                              | BRAZIL                           |
| Tin | Metahub Industries Sdn. Bhd.                                                          | MALAYSIA                         |
| Tin | Metallic Resources, Inc.                                                              | UNITED STATES OF AMERICA         |
| Tin | Metallo Chimique                                                                      | BELGIUM                          |
| Tin | Metallo-Chimique N.V.                                                                 | BELGIUM                          |
| Tin | Mineração Taboca S.A.                                                                 | BRAZIL                           |
| Tin | Minsur                                                                                | PERU                             |
| Tin | Mitsubishi Materials Corporation                                                      | JAPAN                            |
| Tin | Modeltech Sdn Bhd                                                                     | MALAYSIA                         |
| Tin | Nankang Nanshan Tin Manufactory Co., Ltd.                                             | CHINA                            |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company                                      | VIET NAM                         |
| Tin | Novosibirsk Processing Plant Ltd.                                                     | RUSSIAN FEDERATION               |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd.                                               | THAILAND                         |
| Tin | O.M. Manufacturing Philippines, Inc.                                                  | PHILIPPINES                      |
| Tin | Operaciones Metalurgical S.A.                                                         | BOLIVIA (PLURINATIONAL STATE OF) |
| Tin | Phoenix Metal Ltd.                                                                    | RWANDA                           |
| Tin | Pohang Iron and Steel Co. Ltd.                                                        | KOREA, REPUBLIC OF               |
| Tin | PT Alam Lestari Kencana                                                               | 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 Bangka Kudai Tin                                                                   | INDONESIA                        |
| Tin | PT Bangka Prima Tin                                                                   | INDONESIA                        |
| Tin | PT Bangka Putra Karya                                                                 | INDONESIA                        |
| Tin | PT Bangka Timah Utama Sejahtera                                                       | INDONESIA                        |
| Tin | PT Bangka Tin Industry                                                                | INDONESIA                        |
| Tin | PT Belitung Industri Sejahtera                                                        | INDONESIA                        |
| Tin | PT BilliTin Makmur Lestari                                                            | INDONESIA                        |
| Tin | PT Bukit Timah                                                                        | INDONESIA                        |
| Tin | PT Cipta Persada Mulia                                                                | INDONESIA                        |

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| Tin      | PT DS Jaya Abadi                                   | INDONESIA                 |
| Tin      | PT Eunindo Usaha Mandiri                           | INDONESIA                 |
| Tin      | PT Fang Di MulTindo                                | INDONESIA                 |
| Tin      | Pt Inti Stania Prima                               | INDONESIA                 |
| Tin      | PT Justindo                                        | INDONESIA                 |
| Tin      | PT Karimun Mining                                  | INDONESIA                 |
| Tin      | PT Kijang Jaya Mandiri                             | INDONESIA                 |
| Tin      | PT Lautan Harmonis Sejahtera                       | INDONESIA                 |
| Tin      | PT Menara Cipta Mulia                              | INDONESIA                 |
| Tin      | PT Mitra Stania Prima                              | INDONESIA                 |
| Tin      | PT O.M. Indonesia                                  | INDONESIA                 |
| Tin      | PT Panca Mega Persada                              | INDONESIA                 |
| Tin      | PT Pelat Timah Nusantara Tbk                       | INDONESIA                 |
| Tin      | PT Prima Timah Utama                               | INDONESIA                 |
| Tin      | PT Refined Bangka Tin                              | INDONESIA                 |
| Tin      | PT Sariwiguna Binasentosa                          | INDONESIA                 |
| Tin      | PT Seirama Tin investment                          | INDONESIA                 |
| Tin      | PT Stanindo Inti Perkasa                           | INDONESIA                 |
| Tin      | PT Sukses Inti Makmur                              | INDONESIA                 |
| Tin      | PT Sumber Jaya Indah                               | INDONESIA                 |
| Tin      | PT Timah (Persero) Tbk Kundur                      | INDONESIA                 |
| Tin      | PT Timah (Persero) Tbk Mentok                      | INDONESIA                 |
| Tin      | PT Tinindo Inter Nusa                              | INDONESIA                 |
| Tin      | PT Tirus Putra Mandiri                             | INDONESIA                 |
| Tin      | PT Tommy Utama                                     | INDONESIA                 |
| Tin      | PT Wahana Perkit Jaya                              | INDONESIA                 |
| Tin      | Resind Indústria e Comércio Ltda.                  | BRAZIL                    |
| Tin      | Rui Da Hung                                        | TAIWAN, PROVINCE OF CHINA |
| Tin      | Shao Xing Tian Long Tin Materials Co Ltd           | CHINA                     |
| Tin      | Smelter Not Listed                                 |                           |
| Tin      | Smelter not yet identified                         |                           |
| Tin      | Soft Metais Ltda.                                  | BRAZIL                    |
| Tin      | Sungeel Hiten Co.,Ltd.                             | KOREA (REPUBLIC OF)       |
| Tin      | Super Ligas                                        | BRAZIL                    |
| Tin      | Superior Technology 9Shenzen) Co. Ltd.             | CHINA                     |
| Tin      | Thaisarco                                          | THAILAND                  |
| Tin      | Ton Yi Industrial Corporation                      | TAIWAN                    |
| Tin      | Tuyen Quang Non-Ferrous Metals Joint Stock Company | VIET NAM                  |
| Tin      | Unknown                                            |                           |
| Tin      | VQB Mineral and Trading Group JSC                  | VIET NAM                  |
| Tin      | White Solder Metalurgia e Mineração Ltda.          | BRAZIL                    |
| Tin      | Xianghualing Tin Industry Co., Ltd                 | CHINA                     |
| Tin      | Xinmao Xiye (Tin Company)                          | CHINA                     |
| Tin      | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.      | CHINA                     |
| Tin      | YunNan GeJiu Jin Ye Mineral Co.,Ltd                | CHINA                     |
| Tin      | Yunnan Tin Company Limited                         | CHINA                     |
| Tin      | Zhongshan Jinye Smelting Co., Ltd                  | CHINA                     |
| Tungsten | A.L.M.T. TUNGSTEN Corp.                            | JAPAN                     |
| Tungsten | ACL Metais Eireli                                  | BRAZIL                    |
| Tungsten | Asia Tungsten Products Vietnam Ltd.                | VIET NAM                  |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd.       | CHINA                     |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd.               | CHINA                     |
| Tungsten | Dayu Jincheng Tungsten Industry Co., Ltd.          | CHINA                     |
| Tungsten | Dayu Weiliang Tungsten Co., Ltd.                   | CHINA                     |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd.                   | CHINA                     |
| Tungsten | Ganxian Shirui New Material Co., Ltd.              | CHINA                     |

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| Tungsten | Ganzhou Haichuang Tungsten Industry Co., Ltd.                   | CHINA                    |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd.                     | CHINA                    |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd.                         | CHINA                    |
| Tungsten | Ganzhou Non-ferrous Metals Smelting Co., Ltd.                   | CHINA                    |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd.                              | CHINA                    |
| Tungsten | Ganzhou Yatai Tungsten Co., Ltd.                                | CHINA                    |
| Tungsten | Global Tungsten & Powders Corp.                                 | UNITED STATES            |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd.                            | CHINA                    |
| Tungsten | H.C. Starck GmbH                                                | GERMANY                  |
| Tungsten | H.C. Starck Smelting GmbH & Co.KG                               | GERMANY                  |
| Tungsten | Hunan Chenzhou Mining Co., Ltd.                                 | CHINA                    |
| Tungsten | Hunan Chuangda Metallurgy Group Co. Ltd.                        | CHINA                    |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji                 | CHINA                    |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Yanglin              | CHINA                    |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd.                     | CHINA                    |
| Tungsten | Hunan Chun-chang Non-ferrous Smelting & Concentrating Co., Ltd. | CHINA                    |
| Tungsten | Hydrometallurg, JSC                                             | RUSSIAN FEDERATION       |
| Tungsten | Japan New Metals Co., Ltd.                                      | JAPAN                    |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd.                 | CHINA                    |
| Tungsten | Jiangxi Dayu Longxintai Tungsten Co., Ltd.                      | CHINA                    |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd.                              | CHINA                    |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.           | CHINA                    |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.   | CHINA                    |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd.                    | CHINA                    |
| Tungsten | Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd.            | CHINA                    |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd.                             | CHINA                    |
| Tungsten | Kennametal Fallon                                               | UNITED STATES            |
| Tungsten | Kennametal Huntsville                                           | UNITED STATES OF AMERICA |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd.                                 | CHINA                    |
| Tungsten | Moliren Ltd                                                     | RUSSIAN FEDERATION       |
| Tungsten | Niagara Refining LLC                                            | UNITED STATES OF AMERICA |
| Tungsten | Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC       | VIET NAM                 |
| Tungsten | Philippine Chuangxin Industrial Co., Inc.                       | PHILIPPINES              |
| Tungsten | Pobedit, JSC                                                    | RUSSIAN FEDERATION       |
| Tungsten | Sanher Tungsten Vietnam Co., Ltd.                               | VIET NAM                 |
| Tungsten | South-East Nonferrous Metal Company Limited of Hengyang City    | CHINA                    |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd.                             | VIET NAM                 |
| Tungsten | Unecha Refractory metals plant                                  | RUSSIAN FEDERATION       |
| Tungsten | Vietnam Youngsun Tungsten Industry Co., Ltd.                    | VIET NAM                 |
| Tungsten | Wolfram Bergbau und Hütten AG                                   | AUSTRIA                  |
| Tungsten | Woltech Korea Co., Ltd.                                         | KOREA, REPUBLIC OF       |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd.                                | CHINA                    |
| Tungsten | Xiamen Tungsten Co., Ltd.                                       | CHINA                    |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.     | CHINA                    |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd.                       | CHINA                    |

