

**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION**

**Washington, D.C. 20549**

**FORM SD  
Specialized Disclosure Report**

**HASBRO, INC.**

(Exact name of registrant as specified in its charter)

**Rhode Island**

(State or other jurisdiction of incorporation or organization)

**1-6682**

(Commission File Number)

**05-0155090**

(IRS Employer Identification No.)

**1027 Newport Avenue, Pawtucket, Rhode  
Island**

(Address of principal executive offices)

**02861**

(Zip code)

**Deborah Thomas, Executive Vice President and Chief Financial Officer, (401) 431-8697**

(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, 2020 to December 31, 2020.

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

## Introduction:

Hasbro, Inc. (“Hasbro,” the “Company,” “we,” “us,” or “our”) (NASDAQ: HAS) is a global play and entertainment company committed to Creating the World’s Best Play and Entertainment Experiences and making the world a better place for all children, fans and families. Hasbro delivers immersive brand experiences for global audiences through consumer products, including toys and games; gaming, led by the team at Wizards of the Coast, an award-winning developer of tabletop and digital games; and entertainment through Entertainment One (“eOne”), our independent studio.

Our iconic brands include MAGIC: THE GATHERING, NERF, PLAY-DOH, TRANSFORMERS, PEPPA PIG, MONOPOLY, MY LITTLE PONY, BABY ALIVE, DUNGEONS & DRAGONS, PJ MASKS and POWER RANGERS, as well as premier partner brands. For the past decade, we have been consistently recognized for our corporate citizenship, including being named one of the 100 Best Corporate Citizens by 3BL Media and one of the World’s Most Ethical Companies by Ethisphere Institute.

At Hasbro, we believe strong Environmental, Social and Governance (ESG) performance drives long-term value creation for all our stakeholders. Our ESG priorities include climate and sustainability, human rights and ethical sourcing, human capital management and culture, including Diversity, Equity & Inclusion (“DE&I”), and product and content safety.

Some of Hasbro’s products include electronics and other components that contain tin, tungsten, tantalum and/or gold (referred to collectively hereafter as “Conflict Minerals” or “3TG”). Accordingly, we are subject to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (the “Dodd-Frank Act” or the “Act”) and Rule 13p-1 under the Securities Exchange Act of 1934 (the “Conflict Minerals Rule”). During fiscal year 2021, Hasbro began producing certain eOne toy products through Hasbro’s supply chain organization and accordingly, such products were included in the due diligence process and reporting this year. Other eOne product categories remain licensed to third-parties who manufactured and, therefore, sold the products and were not in scope of this year’s reporting.

Hasbro has a Conflict Minerals Policy that is communicated to all of our suppliers and which expresses our commitment to (i) sourcing components and materials from companies that share our values around human rights, ethics and corporate social responsibility, (ii) utilizing due diligence practices to identify 3TG and their sources in our supply chain and (iii) requiring that any 3TG included in our products are sourced from smelters and refiners (“Smelters”) that have been identified as conformant by the Responsible Minerals Assurance Process (RMAP) in order to mitigate the possibility that such 3TG are being used to support armed conflict in the Democratic Republic of the Congo and the adjoining countries (Covered Countries<sup>1</sup>).

Our policy does not preclude suppliers from sourcing certified conflict-free minerals from the DRC or the adjoining countries. To the extent that we identify non-conformance with our policy, we send corrective action letters to the contract manufacturers requiring them to: a) contact the identified Smelters and require that they participate in the conflict minerals audit program; and b) require the contract manufacturer to remove unaudited Smelters from their supply chain for Hasbro products if the contract manufacturer is unable to persuade the Smelter to undergo an RMAP audit. Hasbro's Conflicts Minerals Policy can be found at the following internet address [https://csr.hasbro.com/en-us/news/policy?id=csr\\_conflict\\_minerals\\_policy](https://csr.hasbro.com/en-us/news/policy?id=csr_conflict_minerals_policy).

---

<sup>1</sup> The Democratic Republic of Congo and its adjoining countries (Angola, Burundi, Republic of the Congo, Central African Republic, Rwanda, South Sudan, Republic of Tanzania, Uganda and Zambia).

## **Section 1 – Conflict Minerals Disclosures**

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

Hasbro has determined that during the 2021 calendar year, we contracted to manufacture certain products containing 3TG necessary to the functionality or production of these products. We conducted a Reasonable Country of Origin Inquiry ("RCOI") to assess whether the necessary 3TG in our products originated from the Covered Countries.

During 2021, all of our products were manufactured in third-party vendor or owned facilities (referred to hereafter as "contract manufacturers"). Many of our contract manufacturers are located in the People's Republic of China. We also use contract manufacturers located in other countries, such as India, Vietnam and Mexico, and the United States. Over the past several years, we have continued to diversify our supply chain to reduce reliance on manufacturing facilities in China.

Under our RCOI methodology, Hasbro undertook an applicability assessment to identify the products containing 3TG and the relevant contract manufacturers of those products. To identify the applicable contract manufacturers, Hasbro filtered out contract manufacturers supplying Hasbro with products identified not to contain 3TG after a thorough review. Following the applicability assessment, Hasbro sent surveys to all of our contract manufacturers globally that were identified as producing products that could contain 3TG.

Utilizing the methodology above and based on the information provided by our business units and gathered from our sourcing and technology systems and records, we identified a total of 27 relevant contract manufacturers that are producing products that could contain 3TG. All 27 of these contract manufacturers were surveyed using a third-party technology platform that employs the Conflict Minerals Reporting Template (CMRT) developed by the Responsible Minerals Initiative (RMI), an organization founded by members of the Responsible Business Alliance (RBA) and Global e-Sustainability Initiative (GeSI).

For several years now, Hasbro has conducted training with all of our contract manufacturers identified as using 3TG, to educate these manufacturers on the requirements of the Act related to conflict minerals and to help them understand the importance of conducting due diligence on the sourcing of the 3TG used in our products. We have developed, produced and conducted a training program that provides a summary of the law related to conflict minerals, our obligations under the Act and the Conflict Minerals Rule, as well as the role of our contract manufacturers in assisting us to comply with the requirements of the Conflict Minerals Rule. Due to Covid-19 restrictions, in 2021, Hasbro conducted virtual training sessions with our contract manufacturers, as opposed to in-person sessions. The training materials and presentations were provided in the local language and were enhanced to clarify due diligence and legal reporting requirements. Manufacturers can contact Hasbro via email to Hasbro's designated sourcing organization and may also contact the third-party technology provider about the Conflict Minerals Rule or seek assistance in completing the Conflict Minerals survey using the CMRT.

Hasbro sent surveys to the 27 contract manufacturers that were identified as potentially producing products for us containing 3TG in 2021. Similar to previous years, we surveyed all contract manufacturers identified in our applicability assessment through a thorough product/vendor screening process.

Relevant contract manufacturers received a survey for products they supplied to us. Of the 27 contract manufacturers surveyed, 100% responded to the surveys.

In our survey results, 5 of our 27 contract manufacturers indicated potential sourcing of 3TG from the Covered Countries. The other 22 contract manufacturers indicated in their survey responses that they were either not sourcing any 3TG from the Covered Countries or the products supplied to Hasbro did not contain 3TG. Of the 5 contract manufacturers that identified potential sourcing of 3TG from the Covered Countries, each such contract manufacturer provided a list of Smelters from which they were sourcing 3TG. A complete list of Smelters reported by our contract manufacturers is attached as an exhibit to our Conflict Minerals Report.

1 of the 27 contract manufacturers submitted incomplete data and as part of our due diligence process, we are engaging with this supplier to assist with completion of the data set.

As is discussed in the attached Conflicts Minerals Report, we are currently unable to determine the specific mine location or the country of origin for all of the 3TG used in our products. Based on our RCOI, we believe some of the 3TG used in our products originated in the Covered Countries. However, at this point we cannot make a determination about the source of all the 3TG in our products or components. Accordingly, we conducted due diligence on the source and chain of custody of the necessary conflict minerals we believe may be contained in our products as described in the Conflict Minerals Report included as Exhibit 1.01.

#### **Item 1.02 Exhibit**

In accordance with Rule 13p-1 under the Securities Exchange Act of 1934 ("Rule 13p-1"), this Specialized Disclosure Form ("Form SD") and the associated Conflict Minerals Report are posted to a publicly available Internet site at the following internet address: <http://csr.hasbro.com/has21-conflict-minerals-report>.

### **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.](#)

**Signature**

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

Hasbro, Inc.

(Registrant)

By: /s/ Deborah Thomas

Deborah Thomas

Executive Vice President and Chief Financial  
Officer

(Signature and Title)

May 25, 2022

(Date)

## Exhibit 1.01 – Conflict Minerals Report (CMR)

### Conflict Minerals Report of Hasbro, Inc.

#### Section 1: Introduction

This is the Conflict Minerals Report of Hasbro, Inc. (herein referred to as "Hasbro," the Company, "we," "us," or "our ") for calendar year 2021 in accordance with Rule 13p-1 under the Securities Exchange Act of 1934 ("Rule 13p-1"). Certain terms in this report are defined in Rule 13p-1 and Form SD and the reader is invited to refer to those sources for complete definitions of these terms.

Hasbro marketed products based on owned, controlled and licensed intellectual properties within our brand architecture under the following four brand categories during 2021, each of which may include products containing 3TG: (1) Franchise Brands; (2) Partner Brands; (3) Hasbro Gaming; and (4) Emerging Brands. Some examples of where 3TG can be found in our products are shown below. In all cases, those metals are inaccessible to the consumer because they are located within internal components. During fiscal year 2021, Hasbro began producing certain eOne toy products through Hasbro's supply chain organization and accordingly, such products were included in the due diligence process and reporting this year. Other eOne product categories remain licensed to third-parties who manufactured and, therefore, sold the products and were not in scope of this year's reporting.

**Franchise Brands:** In 2021, Franchise Brands were comprised of Hasbro's flagship owned or controlled brands, which we believe can deliver significant revenues, profits and growth across the Hasbro brand blueprint over the long-term. Our seven Franchise Brands are MAGIC: THE GATHERING, NERF, PLAY-DOH, TRANSFORMERS, MONOPOLY, BABY ALIVE and MY LITTLE PONY. An example of 3TG used in Franchise Brands is the NERF Mega Mastodon which contains Tin in the solder and pins in the Printed Circuit Board Assembly. Gold is also found in the plating for the Printed Circuit Board Assembly.

**Partner Brands:** In 2021, Partner Brands included those brands we licensed from other parties for which we developed toy and game products. Significant Partner Brands included MARVEL, including SPIDER-MAN and THE AVENGERS, LUCASFILMS' STAR WARS, DISNEY PRINCESS and DISNEY FROZEN, DISNEY'S DESCENDANTS, BEYBLADE and SESAME STREET. Partner brands MARVEL, STAR WARS, DISNEY'S DESCENDANTS, DISNEY PRINCESS and DISNEY FROZEN are all owned by The Walt Disney Company ("Disney").

**Hasbro Gaming:** In 2021, Gaming included the Company's face-to-face, trading card and digital game experiences played as board, off-the-board, digital, card, electronic, trading card and role-playing games. Hasbro gaming includes brands such as DUNGEONS & DRAGONS, DUEL MASTERS, JENGA, OPERATION, CONNECT 4, CLUE, THE GAME OF LIFE, TWISTER, TRIVIAL PURSUIT and many others. An example of 3TG used in Hasbro Gaming is the Operation Pet Scan which includes Tin in the electronic wire.

**Emerging Brands:** In 2021, Emerging Brands included those brands we own or control which have not yet grown to the significance of a Franchise Brand, many of which we believe could be potential Franchise Brands. We also launch new brands in this portfolio. In 2021, Hasbro Emerging Brands included brands such as PEPPA PIG, FURREAL FRIENDS, PJ MASKS, POWER RANGERS, GI JOE, SUPER SOAKER, POTATO HEAD, PLAYSKOOL AND LITTLEST PET SHOP. An example of 3TG used in Emerging Brands is the PLAYSKOOL Play Favorites Lullaby Gloworm Toy which includes Tin in the solder and plating in the Printed Circuit Board Assembly. Gold is found in the electronic wire and Tungsten in the Integrated Circuit in the Printed Circuit Board Assembly.

#### Section 2: Due diligence framework

Hasbro designed its due diligence measures to conform, in all material respects, with the internationally recognized due diligence framework as set forth in the Organization for Economic Cooperation and

Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition ("OECD Framework").

### **Section 3: Due diligence measures undertaken**

Hasbro's due diligence efforts for 2021 continued to include the following steps:

#### **Establish company management systems**

- Communicated our conflict minerals policy to all contract manufacturers, ensuring they were made aware that Hasbro's policy does not preclude them from sourcing conflict free minerals from the Covered Countries, but is intended to encourage responsible sourcing. To summarize our conflict minerals policy, Hasbro requires suppliers to fully respond to our information requests, provide a list of smelter or refiner ("Smelters") names, source from conflict free Smelters as determined by a third-party audit program such as the Responsible Minerals Initiative (RMI), London Bullion Market Association, Responsible Jewellery Council or any other recognized equivalent, and to initiate contact with non-audited Smelters to persuade such Smelters to undergo a Responsible Minerals Assurance Process ("RMAP") audit of their due diligence practices.
- Operated under our internal governance structure established in 2013, which is overseen by members of our senior management team and includes a cross functional conflict minerals steering committee and working group comprised of representatives from the Global Government and Regulatory Affairs, ESG, Global Sourcing, Legal, Finance and Internal Audit functions of Hasbro. The Vice President of Global Sustainability and Human Rights oversees the program and its implementation.
- Provided surveyed contract manufacturers with training presentations that include an overview of the conflict minerals rule under the Dodd-Frank Act, as well as trainings on how to complete the survey. The communication and training specified that contract manufacturers should not ban sourcing 3TG from the Covered Countries in order to maintain support of socio-economic regional development, so long as the contract manufacturers are utilizing only conformant Smelters. In addition, Hasbro directly reviewed a sample of contract manufacturer conflict minerals policies to ensure that they included the minimum policy requirements and did not ban minerals from the Covered Countries.
- Engaged with contract manufacturers that Hasbro believed were most likely to supply products containing 3TG, informing them that Hasbro is subject to Section 1502 of the Dodd Frank Act and that their cooperation in responding to the survey is required.
- Conducted supply chain surveys using a third-party platform based on the RMI Conflict Minerals Reporting Template (CMRT). Surveys were sent to the 27 contract manufacturers of products identified during our applicability assessment as potentially containing 3TG.
- Engaged as necessary with unaudited Smelters by sending a letter requiring that they undergo the RMI audit process in order to demonstrate compliance with the Hasbro Conflict Minerals policy.
- Maintained our grievance mechanism to enable the reporting of grievances via the Hasbro Conflict Minerals email box.
- Maintained our policy of retaining conflict minerals program documentation for 5 years.

#### **Identify and assess risks in the supply chain**

- Contract manufacturers surveyed were asked to identify Smelters that process conflict minerals contained in our products, including country of origin of the 3TG, based on the RMI CMRT.

Hasbro required vendors to provide information on Hasbro products only (“product-level declarations”).

- Every survey was entered into our third-party technology platform and then reviewed by the technology platform, a third-party consultant and, where deemed necessary, Hasbro personnel.
- Non-responsive contract manufacturers and survey responses that we believed to be incomplete or inconsistent were identified. We worked with the non-responsive suppliers and have received responses from all of them. We are continuing to engage with one supplier to complete the data.
- Reasons for follow-up with contract manufacturers included, but were not limited to, that the contract manufacturer did not provide a complete or accurate Smelter list, did not receive complete 3TG sourcing information from all of its relevant suppliers, the response was not specific to Hasbro products only, or inconsistencies were identified in the answers contract manufacturers provided within the survey.
- Smelters identified by contract manufacturers surveyed by Hasbro were compared against lists maintained by the technology platform provider, the current Smelter lists from the RMAP and our external consultant. This was done to confirm the validity of Smelters and the plausibility of the countries of origin.
- Reviewed contract manufacturers policies and procedures directly, in addition to conducting Responsible Business Alliance (RBA) audits, in order to ensure they meet minimum requirements.
- Conducted remote visits to contract manufacturers and Smelters in order to learn more about effective implementation and challenges to responsible mineral use.

#### **Design and implement a strategy to respond to identified risks**

- Executive members of the steering committee met three times during the 2021 conflict minerals due diligence period to review the results of the applicability assessment, survey review and associated risks.
- Contract manufacturers that did not respond to Hasbro's initial survey request were sent escalation letters directing that they provide the information requested. In cases where additional follow-up was needed, emails were sent by the technology platform, by our third-party consultant and contact was made by Hasbro management.
- Contract manufacturers that provided survey responses identifying Smelters not on the RMI's active or compliant Smelter lists were sent corrective action letters, as necessary, noting that Hasbro requires them to source 3TG from RMAP-compliant Smelters. In the corrective action letters, Hasbro requested that contract manufacturers that source from non-RMAP-compliant Smelters verify if the Smelters are in the Hasbro supply chain. If the Smelter was not in the supply chain, they were required to update their response and remove the Smelter from their list. If the Smelter was in the supply chain, contract manufacturers were instructed to contact the respective Smelters and require them to participate in a recognized conflict minerals audit program and provide documentation of this to Hasbro. If they were not able to obtain Smelter cooperation, the contract manufacturers were reminded of the Hasbro conflict minerals sourcing policy and requirement to remove the unaudited Smelter from their supply chain for Hasbro Products.

#### **Carry out independent third-party audit of Smelter due diligence practices**

Hasbro is a downstream consumer of 3TG and is many steps removed from Smelters that provide minerals and ores. Hasbro does not purchase raw minerals or ores and does not directly purchase 3TG.

Therefore, Hasbro does not perform or direct audits of Smelters within the supply chain. Rather, as a member of the RMI we rely on and support the audits carried out by that organization. Those audits confirm that Smelters conform to the OECD Due Diligence Guidance for their own sourcing practices by reviewing the Smelter sourcing/conflict minerals policy and verifying implementation.

#### Report annually on supply chain due diligence

This report and the associated Form SD are available online at the following internet address: <http://csr.hasbro.com/has21-conflict-minerals-report>.

#### Section 4: Determination

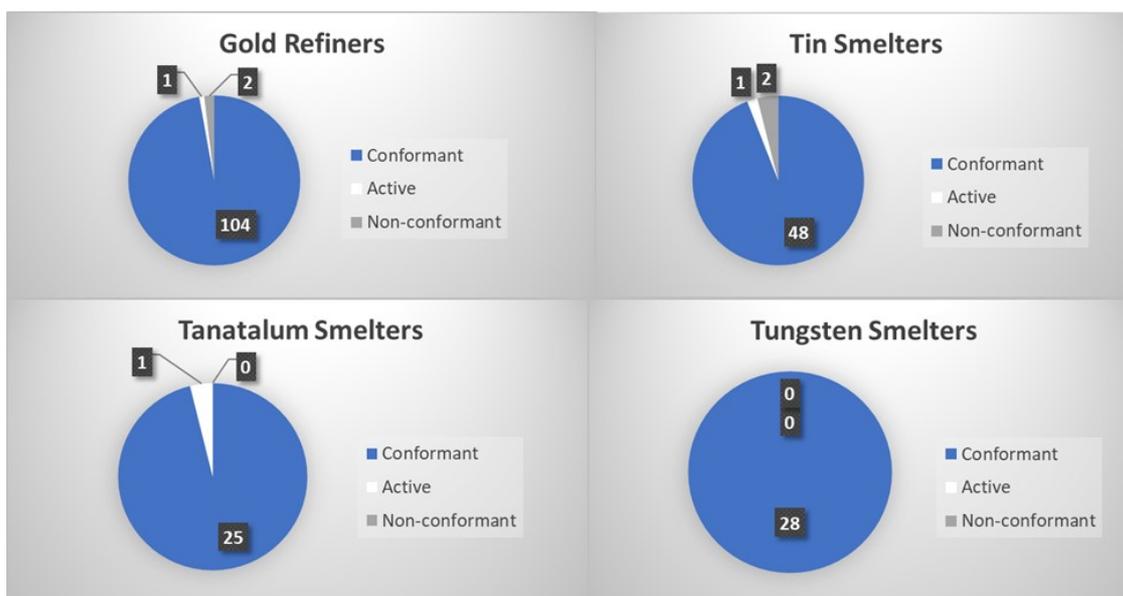
Based on the due diligence described above for 2021, Hasbro was able to determine that some 3TG used by our contract manufacturers for Hasbro products originated in the Covered Countries and/or did not originate from recycled or scrap sources.

As a downstream consumer of 3TG, Hasbro must rely on its contract manufacturers to gather information about Smelters in the supply chain. Hasbro received responses from 100% of the contract manufacturers it surveyed (the survey included all 27 contract manufacturers identified as potentially incorporating 3TG into products supplied to Hasbro). The relevant contract manufacturers declared a total of 212 unique Smelter names as the source of 3TG in Hasbro products. Of the 212 declared Smelters, 98% were designated as conformant or active under the RMAP for 2021. However, we are unable to link specific Smelters to our applicable products. As of the end of the reporting year all smelters identified as operational in our supply chain were RMAP conformant or active.

The results of our due diligence of the 3TG used in our in-scope products are noted below:

<b>2021 Smelter</b>	<b><i>Tin</i></b>	<b><i>Tungsten</i></b>	<b><i>Tantalum</i></b>	<b><i>Gold</i></b>	<b><i>Total</i></b>
<b>Total number of Smelters</b>	<b>51</b>	<b>28</b>	<b>26</b>	<b>107</b>	<b>212</b>
Number (%) of Smelters listed as conformant by RMI	49 (96%)	28 (100%)	26 (100%)	105 (98%)	208 (98%)
Number (%) of Smelters not sourcing from Covered Countries (RMI)	48 (94%)	3 (11%)	14 (54%)	14 (13%)	79 (37%)
Number (%) of Smelters that are conformant <u>or</u> not sourcing from the Covered Countries	51 (100%)	28 (100%)	26 (100%)	107 (100%)	212 (100%)

## Status of Identified Smelters



Set forth in Annex 1 is a list of the unique Smelter names disclosed to us by contract manufacturers broken down by metal. Based on the information provided by Hasbro's contract manufacturers, from the RMAP and other sources, Hasbro believes that the countries of origin of the 3TG contained in some of our products might include Covered Countries, and may not originate from recycled or scrap sources, but we are not able to make that determination at this time for all products or sources. The aggregated list of Countries of Origin based on input from RMI and their Country of Origin list and the Smelters reported to us by our contract manufacturers is set forth in Annex 2.

The Hasbro sourcing model is designed to provide Hasbro flexibility to move production of products among contract manufacturers based on contract manufacturer capacities and product demand. Consequently, there may be instances where the same Hasbro branded product is manufactured by multiple contract manufacturers, which increases the complexity in linking a product with specific Smelters.

### **Section 5: Independent audit**

Hasbro has determined that for 2021 an independent private sector audit is not required.

### **Section 6: Continuous Improvement efforts to mitigate risk**

Hasbro took the following steps to improve our program overall, the number and quality of responses in the 2021 compliance period and to mitigate risk that 3TG used in Hasbro products may finance or benefit armed groups in the Covered Countries:

- Achieved a 100% response rate from all applicable contract manufacturers. Engaged with the five contract manufacturers to bring the four identified non-conformant Smelters into conformance with the RMAP process or have them removed from the supply chain. The contract manufacturers have informed Hasbro that the Smelters have been removed from the supply chain.
- Continued to use contract terms and conditions for new contracts requiring contract manufacturers to respond to inquiries regarding 3TG in a timely manner, such as through

incorporation of conflict minerals requirements into Hasbro's Vendor Manual, which is incorporated into Hasbro's Master Agreements with contract manufacturers.

- Rather than relying on contract manufacturers to provide country of origin information, we undertook our own efforts to identify countries of origin using our third-party technology provider. Our external consultant conducted a further plausibility review to ensure that the identified countries have known 3TG ore mining operations or proven mineral reserves.
- Continued to work with contract manufacturers to help them understand the importance of this initiative to Hasbro and to encourage their participation in the conflict minerals survey through trainings for relevant contract manufacturers. Due to Covid-19 circumstances, Hasbro conducted virtual training sessions for all global in-scope vendors, as opposed to in-person sessions. We believe this resulted in improvements in identifying Smelters applicable to Hasbro.

In the next compliance period, Hasbro intends to take the following steps to further improve the number and quality of contract manufacturer responses and continue to mitigate the risk that 3TG used in Hasbro products may finance or benefit armed groups in the Covered Countries:

- Continue to use contract terms and conditions for new contracts requiring contract manufacturers to respond to inquiries regarding conflict minerals in a timely manner.
- Continue engaging with contract manufacturers, with the objective of maintaining a 100% response rate from all applicable contract manufacturers and obtaining complete lists.
- Continue to work with contract manufacturers to identify to the extent possible the source of 3TG used in Hasbro's products.
- Continue to build capabilities with active and new contract manufacturers by helping them understand the importance of this initiative to Hasbro and to encourage their participation through contract manufacturer trainings.
- Continue to require that any 3TG included in our products be sourced from Smelters that are identified as conflict free through the RMAP or an audit program with which RMAP has a mutual recognition agreement.
- Continue working with our contract manufacturers to better understand how individual sources of 3TG may apply to our individual product categories.
- As a result of becoming a full RBA member in October 2016, Hasbro will continue to utilize an annual RBA Validated Audit Process (VAP) or Customer Managed Audit (CMA) audit for 100% of our contract manufacturers, which includes verifying that a manufacturer has a documented, effective and communicated conflict minerals policy and management program.
- Continue to emphasize that Hasbro's policy does not preclude contract manufacturers from sourcing conflict free minerals from the DRC and adjoining countries and communicate this policy provision to contract manufacturers.

Certain statements in this Conflict Minerals Report contain "forward-looking statements" within the meaning of the Private Securities Litigation Reform Act of 1995. These forward-looking statements include expectations concerning the Company's future actions to engage contract manufacturers, to identify to the extent possible the source of 3TG in its products and to take other actions regarding its product sourcing. The Company's actual actions or results may differ materially from those expected or anticipated in the forward-looking statements due to both known and unknown risks and uncertainties including, but not limited to, decisions to make changes in the Company's continual improvement efforts and delays or difficulties in engaging contract manufacturers and identifying the source of 3TG contained in the Company's products.

**ANNEX 1**

**Identified Smelters  
(Of the 212 identified Smelters, 208 were RMAP active or conformant for 2021)**

<b>Metal</b>	<b>Official Smelter Name</b>	<b>RMI Smelter ID</b>	<b>Smelter Country</b>	<b>Conformance Status</b>
Gold	8853 S.p.A.	CID002763	Italy	Conformant
Gold	Advanced Chemical Company	CID000015	United States	Conformant
Gold	Aida Chemical Industries Co., Ltd.	CID000019	Japan	Conformant
Gold	Al Etihad Gold Refinery DMCC	CID002560	United Arab Emirates	Conformant
Gold	Allgemeine Gold-und Silberscheideanstalt A.G.	CID000035	Germany	Conformant
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	CID000041	Uzbekistan	Conformant
Gold	AngloGold Ashanti Corrego do Sitio Mineracao	CID000058	Brazil	Conformant
Gold	Argor-Heraeus S.A.	CID000077	Switzerland	Conformant
Gold	Asahi Pretec Corp.	CID000082	Japan	Conformant
Gold	Asahi Refining Canada Ltd.	CID000924	Canada	Conformant
Gold	Asahi Refining USA Inc.	CID000920	United States	Conformant
Gold	Asaka Riken Co., Ltd.	CID000090	Japan	Conformant
Gold	Aurubis AG	CID000113	Germany	Conformant
Gold	Bangalore Refinery	CID002863	India	Conformant
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	CID000128	Philippines	Conformant
Gold	Boliden AB	CID000157	Sweden	Conformant
Gold	C. Hafner GmbH + Co. KG	CID000176	Germany	Conformant
Gold	CCR Refinery - Glencore Canada Corporation	CID000185	Canada	Conformant
Gold	Cendres + Metaux S.A.	CID000189	Switzerland	Conformant
Gold	Chimet S.p.A.	CID000233	Italy	Conformant
Gold	Chugai Mining	CID000264	Japan	Conformant
Gold	DODUCO Contacts and Refining GmbH	CID000362	Germany	Conformant
Gold	Dowa	CID000401	Japan	Conformant
Gold	DSC (Do Sung Corporation)	CID000359	Korea, Republic of	Conformant
Gold	Eco-System Recycling Co., Ltd. East Plant	CID000425	Japan	Conformant

<b>Metal</b>	<b>Official Smelter Name</b>	<b>RMI Smelter ID</b>	<b>Smelter Country</b>	<b>Conformance Status</b>
Gold	Eco-System Recycling Co., Ltd. North Plant	CID003424	Japan	Conformant
Gold	Eco-System Recycling Co., Ltd. West Plant	CID003425	Japan	Conformant
Gold	Emirates Gold DMCC	CID002561	United Arab Emirates	Conformant
Gold	Geib Refining Corporation	CID002459	United States	Conformant
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CID002243	China	Conformant
Gold	Heimerle + Meule GmbH	CID000694	Germany	Conformant
Gold	Heraeus Metals Hong Kong Ltd.	CID000707	China	Conformant
Gold	Heraeus Precious Metals GmbH & Co. KG	CID000711	Germany	Conformant
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CID000801	China	Conformant
Gold	Ishifuku Metal Industry Co., Ltd.	CID000807	Japan	Conformant
Gold	Istanbul Gold Refinery	CID000814	Turkey	Conformant
Gold	Italpreziosi	CID002765	Italy	Conformant
Gold	Japan Mint	CID000823	Japan	Conformant
Gold	Jiangxi Copper Co., Ltd.	CID000855	China	Conformant
Gold	JSC Uralelectromed	CID000929	Russian Federation	Conformant
Gold	JX Nippon Mining & Metals Co., Ltd.	CID000937	Japan	Conformant
Gold	Kazzinc	CID000957	Kazakhstan	Conformant
Gold	Kennecott Utah Copper LLC	CID000969	United States	Conformant
Gold	KGHM Polska Miedz Spolka Akcyjna	CID002511	Poland	Conformant
Gold	Kojima Chemicals Co., Ltd.	CID000981	Japan	Conformant
Gold	Korea Zinc Co., Ltd.	CID002605	Korea, Republic of	Conformant
Gold	L'Orfebre S.A.	CID002762	Andorra	Conformant
Gold	LS-NIKKO Copper Inc.	CID001078	Korea, Republic of	Conformant
Gold	LT Metal Ltd.	CID000689	Korea, Republic of	Conformant
Gold	Marsam Metals	CID002606	Brazil	Conformant
Gold	Materion	CID001113	United States	Conformant
Gold	Matsuda Sangyo Co., Ltd.	CID001119	Japan	Conformant
Gold	Metalor Technologies (Hong Kong) Ltd.	CID001149	China	Conformant
Gold	Metalor Technologies (Singapore) Pte., Ltd.	CID001152	Singapore	Conformant
Gold	Metalor Technologies (Suzhou) Ltd.	CID001147	China	Conformant

<b>Metal</b>	<b>Official Smelter Name</b>	<b>RMI Smelter ID</b>	<b>Smelter Country</b>	<b>Conformance Status</b>
Gold	Metalor Technologies S.A.	CID001153	Switzerland	Conformant
Gold	Metalor USA Refining Corporation	CID001157	United States	Conformant
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	CID001161	Mexico	Conformant
Gold	Mitsubishi Materials Corporation	CID001188	Japan	Conformant
Gold	Mitsui Mining and Smelting Co., Ltd.	CID001193	Japan	Conformant
Gold	MMTC-PAMP India Pvt., Ltd.	CID002509	India	Conformant
Gold	Moscow Special Alloys Processing Plant	CID001204	Russian Federation	Conformant
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	CID001220	Turkey	Conformant
Gold	Navoi Mining and Metallurgical Combinat	CID001236	Uzbekistan	Conformant
Gold	Nihon Material Co., Ltd.	CID001259	Japan	Conformant
Gold	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	CID002779	Austria	Conformant
Gold	Ohura Precious Metal Industry Co., Ltd.	CID001325	Japan	Conformant
Gold	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	CID001326	Russian Federation	Conformant
Gold	OJSC Novosibirsk Refinery	CID000493	Russian Federation	Conformant
Gold	PAMP S.A.	CID001352	Switzerland	Conformant
Gold	Planta Recuperadora de Metales SpA	CID002919	Chile	Conformant
Gold	Prioksky Plant of Non-Ferrous Metals	CID001386	Russian Federation	Conformant
Gold	PT Aneka Tambang (Persero) Tbk	CID001397	Indonesia	Conformant
Gold	PX Precinox S.A.	CID001498	Switzerland	Conformant
Gold	Rand Refinery (Pty) Ltd.	CID001512	South Africa	Conformant
Gold	REMONDIS PMR B.V.	CID002582	Netherlands	Conformant
Gold	Royal Canadian Mint	CID001534	Canada	Conformant
Gold	SAAMP	CID002761	France	Conformant
Gold	Safimet S.p.A	CID002973	Italy	Conformant
Gold	SAFINA A.S.	CID002290	Czech Republic	Conformant
Gold	Samduck Precious Metals	CID001555	Korea, Republic of	Conformant
Gold	SEMPSA Joyeria Plateria S.A.	CID001585	Spain	Conformant
Gold	Shandong Gold Smelting Co., Ltd.	CID001916	China	Conformant
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CID001622	China	Conformant
Gold	Sichuan Tianze Precious Metals Co., Ltd.	CID001736	China	Conformant

<b>Metal</b>	<b>Official Smelter Name</b>	<b>RMI Smelter ID</b>	<b>Smelter Country</b>	<b>Conformance Status</b>
Gold	Singway Technology Co., Ltd.	CID002516	Taiwan	Conformant
Gold	SOE Shyolkovsky Factory of Secondary Precious Metals	CID001756	Russian Federation	Conformant
Gold	Solar Applied Materials Technology Corp.	CID001761	Taiwan	Conformant
Gold	Sumitomo Metal Mining Co., Ltd.	CID001798	Japan	Conformant
Gold	SungEel HiMetal Co., Ltd.	CID002918	Korea, Republic of	Conformant
Gold	T.C.A S.p.A	CID002580	Italy	Conformant
Gold	Tanaka Kikinzoku Kogyo K.K.	CID001875	Japan	Conformant
Gold	Tokuriki Honten Co., Ltd.	CID001938	Japan	Conformant
Gold	TOO Tau-Ken-Altyn	CID002615	Kazakhstan	Conformant
Gold	Torecom	CID001955	Korea, Republic of	Conformant
Gold	Umicore Precious Metals Thailand	CID002314	Thailand	Conformant
Gold	Umicore S.A. Business Unit Precious Metals Refining	CID001980	Belgium	Conformant
Gold	United Precious Metal Refining, Inc.	CID001993	United States	Conformant
Gold	Valcambi S.A.	CID002003	Switzerland	Conformant
Gold	Western Australian Mint (T/a The Perth Mint)	CID002030	Australia	Conformant
Gold	WIELAND Edelmetalle GmbH	CID002778	Germany	Conformant
Gold	Yamakin Co., Ltd.	CID002100	Japan	Conformant
Gold	Yokohama Metal Co., Ltd.	CID002129	Japan	Conformant
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CID002224	China	Conformant
Gold	SAXONIA Edelmetalle GmbH	CID002777	Germany	Active
Gold	AU Traders and Refiners	CID002850	South Africa	Not Conformant
Gold	Kyrgyzaltyn JSC*	CID001029	Kyrgyzstan	Not Conformant
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	CID000211	China	Conformant
Tantalum	D Block Metals, LLC	CID002504	United States	Conformant
Tantalum	F&X Electro-Materials Ltd.	CID000460	China	Conformant
Tantalum	FIR Metals & Resource Ltd.	CID002505	China	Conformant
Tantalum	Global Advanced Metals Aizu	CID002558	Japan	Conformant
Tantalum	Global Advanced Metals Boyertown	CID002557	United States	Conformant
Tantalum	H.C. Starck Hermsdorf GmbH	CID002547	Germany	Conformant

<b>Metal</b>	<b>Official Smelter Name</b>	<b>RMI Smelter ID</b>	<b>Smelter Country</b>	<b>Conformance Status</b>
Tantalum	H.C. Starck Inc.	CID002548	United States	Conformant
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CID002492	China	Conformant
Tantalum	Jiangxi Tuohong New Raw Material	CID002842	China	Conformant
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CID000914	China	Conformant
Tantalum	Jiujiang Tanbre Co., Ltd.	CID000917	China	Conformant
Tantalum	Metallurgical Products India Pvt., Ltd.	CID001163	India	Conformant
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CID001277	China	Conformant
Tantalum	NPM Silmet AS	CID001200	Estonia	Conformant
Tantalum	Solikamsk Magnesium Works OAO	CID001769	Russian Federation	Conformant
Tantalum	Taki Chemical Co., Ltd.	CID001869	Japan	Conformant
Tantalum	TANIOBIS Co., Ltd.	CID002544	Thailand	Conformant
Tantalum	TANIOBIS GmbH	CID002545	Germany	Conformant
Tantalum	TANIOBIS Japan Co., Ltd.	CID002549	Japan	Conformant
Tantalum	TANIOBIS Smelting GmbH & Co. KG	CID002550	Germany	Conformant
Tantalum	Telex Metals	CID001891	United States	Conformant
Tantalum	Ulba Metallurgical Plant JSC	CID001969	Kazakhstan	Conformant
Tantalum	XIMEI RESOURCES (GUANGDONG) LIMITED	CID000616	China	Conformant
Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	CID001522	China	Conformant
Tantalum	Exotech Inc.	CID000456	United States	Active
Tin	Alpha	CID000292	United States	Conformant
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CID000228	China	Conformant
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CID003190	China	Conformant
Tin	China Tin Group Co., Ltd.	CID001070	China	Conformant
Tin	Dowa	CID000402	Japan	Conformant
Tin	EM Vinto	CID000438	Bolivia	Conformant
Tin	Fenix Metals	CID000468	Poland	Conformant
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CID000538	China	Conformant
Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	CID001908	China	Conformant
Tin	Gejiu Zili Mining And Metallurgy Co., Ltd.	CID000555	China	Conformant
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CID003116	China	Conformant

<b>Metal</b>	<b>Official Smelter Name</b>	<b>RMI Smelter ID</b>	<b>Smelter Country</b>	<b>Conformance Status</b>
Tin	HuiChang Hill Tin Industry Co., Ltd.	CID002844	China	Conformant
Tin	Jiangxi New Nanshan Technology Ltd.	CID001231	China	Conformant
Tin	Luna Smelter, Ltd.	CID003387	Rwanda	Conformant
Tin	Ma'anshan Weitai Tin Co., Ltd.	CID003379	China	Conformant
Tin	Magnu's Minerai's Metais e Ligas Ltda.	CID002468	Brazil	Conformant
Tin	Malaysia Smelting Corporation (MSC)	CID001105	Malaysia	Conformant
Tin	Metallic Resources, Inc.	CID001142	United States	Conformant
Tin	Metallo Belgium N.V.	CID002773	Belgium	Conformant
Tin	Metallo Spain S.L.U.	CID002774	Spain	Conformant
Tin	Mineracao Taboca S.A.	CID001173	Brazil	Conformant
Tin	Minsur	CID001182	Peru	Conformant
Tin	Mitsubishi Materials Corporation	CID001191	Japan	Conformant
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	CID001314	Thailand	Conformant
Tin	O.M. Manufacturing Philippines, Inc.	CID002517	Philippines	Conformant
Tin	Operaciones Metalurgicas S.A.	CID001337	Bolivia	Conformant
Tin	PT Artha Cipta Langgeng	CID001399	Indonesia	Conformant
Tin	PT ATD Makmur Mandiri Jaya	CID002503	Indonesia	Conformant
Tin	PT Babel Surya Alam Lestari	CID001406	Indonesia	Conformant
Tin	PT Bangka Serumpun	CID003205	Indonesia	Conformant
Tin	PT Menara Cipta Mulia	CID002835	Indonesia	Conformant
Tin	PT Mitra Stania Prima	CID001453	Indonesia	Conformant
Tin	PT Prima Timah Utama	CID001458	Indonesia	Conformant
Tin	PT Rajawali Rimba Perkasa	CID003381	Indonesia	Conformant
Tin	PT Refined Bangka Tin	CID001460	Indonesia	Conformant
Tin	PT Stanindo Inti Perkasa	CID001468	Indonesia	Conformant
Tin	PT Timah Tbk Kundur	CID001477	Indonesia	Conformant
Tin	PT Timah Tbk Mentok	CID001482	Indonesia	Conformant
Tin	PT Tinindo Inter Nusa	CID001490	Indonesia	Conformant
Tin	Resind Industria e Comercio Ltda.	CID002706	Brazil	Conformant
Tin	Rui Da Hung	CID001539	Taiwan	Conformant
Tin	Soft Metais Ltda.	CID001758	Brazil	Conformant
Tin	Thai Nguyen Mining and Metallurgy Co., Ltd.	CID002834	Viet Nam	Conformant
Tin	Thaisarco	CID001898	Thailand	Conformant
Tin	Tin Technology & Refining	CID003325	United States	Conformant

<b>Metal</b>	<b>Official Smelter Name</b>	<b>RMI Smelter ID</b>	<b>Smelter Country</b>	<b>Conformance Status</b>
Tin	White Solder Metalurgia e Mineracao Ltda.	CID002036	Brazil	Conformant
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CID002158	China	Conformant
Tin	Yunnan Tin Company Limited	CID002180	China	Conformant
Tin	Melt Metais e Ligas S.A.	CID002500	Brazil	Active
Tin	Gejiu Kai Meng Industry and Trade LLC	CID000942	China	Not Conformant
Tin	Yunnan Yunfan Non-ferrous Metals Co., Ltd.	CID003397	China	Not Conformant
Tungsten	A.L.M.T. TUNGSTEN Corp.	CID000004	Japan	Conformant
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.	CID002513	China	Conformant
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CID000258	China	Conformant
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	CID000875	China	Conformant
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CID002315	China	Conformant
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CID002494	China	Conformant
Tungsten	Global Tungsten & Powders Corp.	CID000568	United States	Conformant
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CID000218	China	Conformant
Tungsten	H.C. Starck Tungsten GmbH	CID002541	Germany	Conformant
Tungsten	Hunan Chenzhou Mining Co., Ltd.	CID000766	China	Conformant
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.	CID000769	China	Conformant
Tungsten	Hydrometallurg, JSC	CID002649	Russian Federation	Conformant
Tungsten	Japan New Metals Co., Ltd.	CID000825	Japan	Conformant
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CID002551	China	Conformant
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CID002321	China	Conformant
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CID002318	China	Conformant
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CID002317	China	Conformant
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CID002316	China	Conformant
Tungsten	Kennametal Fallon	CID000966	United States	Conformant
Tungsten	Kennametal Huntsville	CID000105	United States	Conformant
Tungsten	KGETS CO., LTD.	CID003388	Korea, Republic of	Conformant
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CID002319	China	Conformant

<b>Metal</b>	<b>Official Smelter Name</b>	<b>RMI Smelter ID</b>	<b>Smelter Country</b>	<b>Conformance Status</b>
Tungsten	Masan High-Tech Materials	CID002543	Viet Nam	Conformant
Tungsten	Niagara Refining LLC	CID002589	United States	Conformant
Tungsten	TANIOBIS Smelting GmbH & Co. KG	CID002542	Germany	Conformant
Tungsten	Wolfram Bergbau und Hutten AG	CID002044	Austria	Conformant
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CID002320	China	Conformant
Tungsten	Xiamen Tungsten Co., Ltd.	CID002082	China	Conformant

\*As of May 4<sup>th</sup>, this refiner is now conformant.

## ANNEX 2

### Countries of Origin of 3TG

Country of Origin		
Argentina G	Guinea G	Peru G, Sn, W
Armenia G	Guyana G	Philippines G, W
Australia 3TG	Honduras G	Portugal Sn, W
Austria W	India Ta	Russian Federation 3TG
Azerbaijan G	Indonesia G, Sn	Rwanda* 3TG
Benin G	Ivory Coast G	Saudi Arabia G
Bolivia 3TG	Japan G	Senegal G
Botswana G	Kazakhstan G	Sierra Leone G, Ta
Brazil 3TG	Kenya G	Slovakia G
Burkina Faso G	Kyrgyzstan W	South Africa G
Burundi* 3T	Laos G, Sn	South Korea G, Sn
Canada G	Liberia G	Spain 3TG
Chile G	Madagascar Ta	Sudan G
China 3TG	Malaysia 3T	Suriname G
Colombia 3TG	Mali G	Swaziland G
Congo, Democratic Republic of the* 3TG	Mauritania G	Sweden G
Cuba G	Mexico G	Taiwan Sn
Dominican Republic G	Mongolia G	Tanzania* G
Ecuador G	Morocco G	Thailand 3TG
Egypt G	Mozambique Ta,	Turkey G
Eritrea G	Myanmar 3T	Uganda* 3TG
Ethiopia G, Ta	Namibia G,Ta	United Kingdom of Great Britain and Northern Ireland Sn, W
Fiji G	New Zealand G	United States of America 3TG
Finland G	Nicaragua G	Uzbekistan G, W
France Ta	Niger G	Venezuela Sn
French Guiana G	Nigeria 3T	Vietnam Sn, W
Germany G, Ta, Sn	Oman G	Zambia* G
Ghana G	Panama G	Zimbabwe Ta, W
Guatemala G	Papua New Guinea G	

<p><b>Key:</b> 3TG = Tantalum, Tin, Tungsten and Gold; 3T= Tantalum, Tin and Tungsten G = Gold; Ta= Tantalum; Sn= Tin; W=Tungsten</p>
---