

## EXHIBIT 1.01

### **Altra Industrial Motion Corp. Conflict Minerals Report For The Year Ended December 31, 2019**

This is the Conflict Minerals Report of Altra Industrial Motion Corp. for calendar year 2019, in accordance with Rule 13p-1 under the Securities Exchange Act of 1934 (“1934 Act”). Please refer to Rule 13p-1, Form SD and the 1934 Act Release No. 34-67716<sup>1</sup> for definitions to the terms used in this Conflict Minerals Report (this “Report”), unless otherwise defined herein.

#### Overview

Rule 13p-1 of the 1934 Act (the “Conflict Minerals Rule”) requires disclosure of certain information when a company manufactures or contracts to manufacture products, and the “conflict minerals” specified in the Conflict Minerals Rule are necessary to the functionality or production of those products. For purposes of the Conflict Minerals Rule, “conflict minerals” include: columbite-tantalite (“tantalum”), cassiterite (“tin”), wolframite (“tungsten”), and gold (collectively referred to in this Report as “3TG”).

This Report has been prepared by Altra Industrial Motion Corp. (herein referred to as “Altra”, “we”, “us” or “our”). The information in this Report includes the activities of all subsidiaries owned or controlled by Altra that are required to be consolidated for purposes of this Report. This Report covers products (i) for which 3TG are necessary to the functionality or production of those products; (ii) that were manufactured, or contracted to be manufactured, by Altra; and (iii) for which the manufacture was completed during the reporting period from January 1, 2019 to December 31, 2019 (the “Reporting Period”). These products are collectively referred to in this Report as the “Covered Products”.

#### Our Products

Altra is a premier industrial, global manufacturer and supplier of electromechanical power transmission, motion control and automation products, including highly engineered power transmission, motion control and engine braking systems and components. Altra’s portfolio consists of 27 well-respected brands including Bauer Gear Motor, Boston Gear, Jacobs Vehicle Systems, Kollmorgen, Portescap, Stromag, Svendborg Brakes, TB Wood’s, Thomson and Warner Electric.

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<sup>1</sup> Final Rule: Conflict Minerals, Release No. 34-67716 (August 22, 2012), available at <http://www.sec.gov/rules/final/2012/34-67716.pdf>.

## Compliance with the Conflict Minerals Rule

Altra is fully committed to complying with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, which aims to prevent the use of 3TG that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or adjoining countries (including Angola, Burundi, The Central African Republic, The Republic of Congo, Uganda, Rwanda, South Sudan, Tanzania, and Zambia) (collectively, the "Covered Countries").

In accordance with the Conflict Minerals Rule, Altra undertook measures reasonably designed to (i) identify whether there are any 3TG included in, and necessary to the functionality or production of, products manufactured, or contracted to be manufactured, by Altra, and for which the manufacture was completed during the Reporting Period, and if so, (ii) determine whether any of the 3TG originated in the Covered Countries, or are from recycled or scrap sources. Altra's processes are described in detail below.

While Altra takes compliance with the Conflict Minerals Rule very seriously, as a company engaged in the manufacture and supply of electromechanical power transmission, motion control and automation products, Altra's global supply chain is complex, and Altra is several levels removed from the actual mining of any potential 3TG that may be contained in its final products. Furthermore, Altra does not purchase raw ore or unrefined 3TG, or make purchases from the Covered Countries. Altra must therefore rely on its suppliers to provide information regarding the origin of 3TG that are included in the Covered Products. Moreover, Altra believes that the smelters and refiners in Altra's supply chain -- who Altra typically does not know due to being so far removed from them in the supply chain -- are in the best position to know the origin of the 3TG, and therefore Altra has structured its RCOI and due diligence processes to ultimately identify the applicable smelters of 3TG in Altra's supply chain.

## Reasonable Country of Origin Inquiry

In order to comply with the Conflict Minerals Rule during the Reporting Period, Altra continued to utilize its Conflict Minerals compliance team, led by a member of Altra's senior management. Each of Altra's business units conducted a good faith reasonable country of origin inquiry ("RCOI") regarding 3TG in its supply chain. In accordance with the Conflict Minerals Rule and related guidance provided by the SEC, this RCOI was reasonably designed to determine whether any of the 3TG included in Altra's products originated in the Conflict Region and/or whether any of those 3TG may be from recycled or scrap sources. Due to the overlap between the supplier/smelter RCOI and the supplier/smelter due diligence processes, the supplier/smelter RCOI processes are summarized in the Due Diligence section of this Report.

## Due Diligence

Altra designed its due diligence process to conform in all material respects with the Organization for Economic Cooperation and Development's ("OECD's") Due Diligence Guidance for

Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, an internationally recognized due diligence framework (the “OECD Framework”). In accordance with the OECD Framework, during the Reporting Period Altra has maintained a Conflict Minerals compliance and due diligence program that includes (i) the establishment of strong company management systems, (ii) procedures for identifying and assessing risk in Altra’s supply chain, (iii) a strategy to respond to identified risks, and (iv) public reporting on supply chain due diligence. The following is a summary of Altra’s efforts to comply with the OECD’s Five-Step Framework for Risk-Based Due Diligence in the Mineral Supply Chain.

1. Company Management Systems. Altra has established strong management systems in accordance with Step 1 of the OECD Framework. These systems include the following:
  - a. Altra has adopted and implemented a Policy Statement on Conflict Minerals which is publicly available in the “Governance” section of Altra’s website located at: <https://ir.altramotion.com/governance/governance-documents/>.
  - b. Altra has implemented an internal management structure to support supply chain due diligence. Altra’s management structure consists of (i) a member of Altra’s senior management with overall responsibility for the RCOI and due diligence processes, (ii) members of Altra’s Corporate Supply Chain Department with dedicated responsibility for the design of the RCOI and due diligence processes, and (iii) at least one employee at each of Altra’s business units who are responsible for executing the RCOI and due diligence processes at the business unit level. The business unit-level compliance teams are comprised of subject matter experts from relevant functions such as purchasing, quality assurance and engineering.
  - c. Altra continues to utilize a process to collect required supplier and smelter RCOI and due diligence data, as described below. In addition, Altra continues to require its suppliers to support its Conflict Minerals compliance efforts through contractual methods. For example, Altra has incorporated terms and conditions in its procurement documents which require the supplier to certify that its product is "conflict free."
  - d. Altra continues to engage with suppliers by communicating with and educating them as necessary with respect to the Conflict Minerals Rule.
  - e. Altra’s Code of Business Conduct includes a mechanism for employees to escalate issues and concerns regarding any compliance matter, including issues regarding compliance with the Conflict Minerals Rule. In addition, Altra’s Conflict Minerals business unit-level compliance teams routinely follow up with the management-level compliance team, including Altra’s Corporate Supply Chain and Legal Departments, to identify and escalate any identified issues associated with non-responsive or problematic responses to Altra’s RCOI survey. Altra believes that this system is conducive to identifying and addressing risks as early as possible.

2. Identify and Assess Risks in the Supply Chain. Altra has continued its efforts to increase its supply chain transparency and to identify and assess risks in its supply chain. As noted above, Altra designed its due diligence process to identify the smelters in Altra's supply chain in accordance with Step 2 of the OECD Framework. In particular, Altra's supplier due diligence process included the following:

- Due to the wide variety and high mix of products manufactured and sold by Altra, Altra conducted a risk-based approach to its RCOI and due diligence processes, with all of Altra's businesses targeting suppliers that, in the aggregate, were responsible for the top 80% of the businesses' total annual spending on materials, parts and components (each such supplier, an "In-Scope Supplier").
- Altra sent each In-Scope Supplier a copy of Altra's Policy Statement on Conflict Minerals.
- Altra requested that each In-Scope Supplier complete a survey regarding the presence and origin of 3TG contained within the components, parts and materials supplied to Altra during the Reporting Period.
- As necessary, Altra educated In-Scope Suppliers regarding the reasons for requesting the 3TG data and answered supplier questions related thereto.
- Altra followed up with In-Scope Suppliers that did not respond to Altra's initial outreach, and also followed up with In-Scope Suppliers who submitted data that appeared to be incomplete or incorrect.
- Altra amalgamated supplier-provided smelters into a single unique list of smelters.

Altra has relied on the responses of these In-Scope Suppliers to provide information about the source of 3TG contained within the parts, components and materials supplied to Altra. Some of Altra's In-Scope Suppliers were unable to identify the smelters or countries of origin in their supply chain, some In-Scope Suppliers responded by providing information related to all of the items the In-Scope Supplier produces without identifying smelters specific to the items purchased by Altra, and some In-Scope Suppliers included names of smelters that we believe may have been misidentified as smelters or that are not operational. As noted above, Altra made every reasonable effort to follow up with In-Scope Suppliers that (i) did not respond to Altra's initial outreach or (ii) submitted data that appeared to be incomplete or incorrect.

3. Design and Implement a Strategy to Respond to Risks. Altra has continued to develop and execute measures to respond to identified risks in accordance Step 3 of the OECD Framework. In particular, Altra's strategy includes the following:

- With respect to each smelter identified by Altra's supply chain that declared directly or through their relevant industry association that they did not source from the Covered Countries, and were not recognized as conflict free by the RMI's

Responsible Minerals Assurance Process (“RMAP”), Altra, with the assistance of an outside consultant, reviewed publicly available information to determine if there was any contrary evidence to the smelter’s declaration.

- With respect to each smelter identified by Altra’s supply chain that is sourcing from, or as to which there is reason to believe may be sourcing from, the Covered Countries, Altra did not audit such smelters but instead relied on the RMAP, and if the smelter has not been audited and recognized as conflict free by the RMAP, Altra conducted risk mitigation in accordance with the OECD Framework.
- Altra’s compliance team consolidated the data provided by Altra’s In-Scope Suppliers, as well as the findings from Altra’s outside consultant, for periodic reporting to Altra’s senior management as needed, consistent with the OECD Framework.
- Throughout the due diligence process, Altra identified the applicable risks associated with its supply chain for mitigation as discussed below under “Risk Mitigation Efforts”.
- Altra communicates with and educates suppliers on compliance with the Conflict Minerals Rule as needed.
- Altra communicates to its suppliers that they will be evaluated and reviewed on an ongoing basis for compliance with the Conflict Minerals Rule and that Altra reserves the right at any time to take appropriate actions with respect to non-compliant suppliers, up to and including discontinuing purchases from the supplier.

4. Independent Third Party Audit of Supply Chain Due Diligence. It is important to note that the OECD Framework was written for both upstream and downstream companies in the supply chain. With respect to Step 4 of the OECD Framework, as noted above, Altra is a downstream consumer of 3TG and is many steps removed from smelters and refiners who provide minerals and ore. Altra does not purchase raw or unrefined 3TG and does not, to the best of its knowledge, directly purchase these minerals from any of the Covered Countries. Therefore, Altra does not perform or direct audits of smelters and refiners within its supply chain. Altra relies on industry resources, such as the Conflict Free Smelters Initiative, RMAP and other certifying bodies, to provide certifications and to influence smelters and refiners to participate in audits and achieve conflict-free certifications.

5. Public Report on Supply Chain Due Diligence. Altra complies with Step 5 of the OECD Framework by making this Report and its Policy Statement on Conflict Minerals publicly available in the “Governance” section of Altra’s website located at: <https://ir.altramotion.com/governance/governance-documents/>.

## Results of Our RCOI and Due Diligence Processes

Altra's efforts to collect information from In-Scope Suppliers continued into the current calendar year. Despite Altra's diligent efforts in repeatedly contacting non-responsive suppliers, as of the date of this filing, Altra has yet to receive responses to its 3TG survey from a number of its In-Scope Suppliers. In addition, In-Scope Suppliers who have responded to Altra's 3TG survey have showed varying degrees of cooperation. Some of the challenges Altra has faced with respect to obtaining and analyzing supplier responses include the following: (i) Altra is dependent on information received from its direct suppliers, who are dependent upon information received from their lower level suppliers, to determine (x) the country of origin of 3TG contained in the components and materials supplied to Altra and (y) which specific smelters are providing the source metals that eventually become incorporated into Altra's products; (ii) Altra has a varied supplier base with differing levels of resources and sophistication, many of whom are not themselves subject to Rule 13p-1 of the Exchange Act; (iii) some of Altra's In-Scope Suppliers provided incomplete or unclear responses that required significant follow-up; (iv) some of Altra's In-Scope Suppliers were unable or unwilling to specify the country of origin of, or the smelters or refiners used for, materials and components supplied to Altra; and (v) the majority of Altra's In-Scope Suppliers who did identify smelters or refiners in their supply chain responded to Altra's 3TG survey at a company or divisional level and, therefore, Altra cannot definitively determine whether (x) any of the 3TG reported by these In-Scope Suppliers are actually contained in the products or components supplied to us or (y) whether the identified smelters or refiners are actually in our supply chain.

The responses provided by Altra's In-Scope Suppliers resulted in the identification of 296 unique smelters that may have been the source of 3TG in products Altra manufactured or contracted to manufacture during the Reporting Period. These smelters are identified in Schedule A attached to this Report. With the assistance of its outside consultant, Altra determined that certain of these identified smelters source, or there is reason to believe may source, from the Covered Countries. Altra compared these smelters to the list of smelters that have been audited and recognized as conflict free by the RMAP and, for those smelters that have not been recognized as conflict free by the RMAP, Altra worked with its outside consultant to conduct risk mitigation in accordance with Step 3 of the OECD Framework, including performing additional due diligence to determine (i) whether the products supplied to Altra during the Reporting Period contain the particular 3TG sourced from such smelters, (ii) whether such smelters are part of Altra's supply chain, and (iii) if there is any reason to believe such smelters directly or indirectly finance or benefit armed groups in the Covered Countries.

Notwithstanding the foregoing steps, due to the lack of product-level detail provided by Altra's In-Scope Suppliers, Altra was unable to confirm that the necessary 3TG in its products were processed by any particular smelter or smelters and is, therefore, unable to identify the processing facilities, country of origin or mine or location of origin of such 3TG.

## Risk Mitigation Efforts

In the next compliance period, Altra intends to continue to make efforts to improve its RCOI and due diligence processes, in order to further mitigate any risk that the necessary 3TG in Altra's products could benefit armed groups in the Covered Countries. These efforts include:

- Continue to leverage the activities of the OECD and relevant trade associations to identify and improve best practices for RCOI and due diligence processes;
- Continue to educate members of our management and business unit-level conflict minerals compliance teams as well as other employees who are involved with 3TG on both the supplier and customer sides of Altra's business;
- Continue to engage with suppliers to improve the accuracy and completeness of the information provided to Altra about Altra's supply chain;
- Continue to move towards purchasing only from suppliers who are sourcing from certified, conflict-free smelters;
- Continue to compare the list of smelters identified as a result of Altra's RCOI and due diligence processes to the evolving list of smelters who have been designated as "conflict free" through independent "conflict free" smelter validation programs; and
- Continue to seek to include in supplier contracts a commitment by the supplier to take steps necessary to enable Altra to comply with the Conflict Minerals Rule.

In order to improve the transparency throughout its supply chain, Altra will routinely (i) monitor these risk mitigation efforts, (ii) report to senior management on the effectiveness of these efforts and (iii) make any adjustments to this strategy as may be necessary from time to time.

## Independent Audit

In accordance with the Conflict Minerals Rule and related SEC guidance, an independent private sector audit of this Report is not required.

## SCHEDULE A

The following smelters have been identified by Altra's suppliers as having potentially processed necessary 3TG in certain of Altra's products manufactured during the Reporting Period:

| <b>CID</b> | <b>Metal</b> | <b>Smelter Name</b>   | <b>Country Location of Smelter</b> |
|------------|--------------|---|------------------------------------|
| CID002763  | Gold         | 8853 S.p.A.   | Italy                              |
| CID002708  | Gold         | Abington Reldan Metals, LLC                                   | United States                      |
| CID000015  | Gold         | Advanced Chemical Company                                     | United States                      |
| CID003185  | Gold         | African Gold Refinery   | Uganda                             |
| CID000019  | Gold         | Aida Chemical Industries Co., Ltd.                            | Japan                              |
| CID002560  | Gold         | Al Etihad Gold Refinery DMCC                                  | United Arab Emirates               |
| CID000035  | Gold         | Allgemeine Gold-und Silberscheideanstalt A.G.                 | Germany                            |
| CID000041  | Gold         | Almalyk Mining and Metallurgical Complex (AMMC)               | Uzbekistan                         |
| CID000058  | Gold         | AngloGold Ashanti Córrego do Sítio Mineração                  | Brazil                             |
| CID000077  | Gold         | Argor-Heraeus S.A.  | Switzerland                        |
| CID000082  | Gold         | Asahi Pretec Corp.  | Japan                              |
| CID000924  | Gold         | Asahi Refining Canada Ltd.                                    | Canada                             |
| CID000920  | Gold         | Asahi Refining USA Inc.                                       | United States                      |
| CID000090  | Gold         | Asaka Riken Co., Ltd.   | Japan                              |
| CID000103  | Gold         | Atasay Kuyumculuk Sanayi Ve Ticaret A.S.                      | Turkey                             |
| CID002850  | Gold         | AU Traders and Refiners                                       | South Africa                       |
| CID000113  | Gold         | Aurubis AG  | Germany                            |
| CID002863  | Gold         | Bangalore Refinery  | India                              |
| CID000128  | Gold         | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | Philippines                        |
| CID000157  | Gold         | Boliden AB  | Sweden                             |
| CID000176  | Gold         | C. Hafner GmbH + Co. KG                                       | Germany                            |
| CID000180  | Gold         | Caridad   | Mexico                             |
| CID000185  | Gold         | CCR Refinery - Glencore Canada Corporation                    | Canada                             |
| CID000189  | Gold         | Cendres + Métaux S.A.   | Switzerland                        |
| CID003382  | Gold         | CGR Metalloys Pvt Ltd.  | India                              |
| CID000233  | Gold         | Chimet S.p.A.   | Italy                              |



| <b>CID</b> | <b>Metal</b> | <b>Smelter Name</b>   | <b>Country Location of Smelter</b> |
|------------|--------------|---|------------------------------------|
| CID000264  | Gold         | Chugai Mining   | Japan                              |
| CID000343  | Gold         | Daye Non-Ferrous Metals Mining Ltd.                             | China                              |
| CID002867  | Gold         | Degussa Sonne / Mond Goldhandel GmbH                            | Germany                            |
| CID003348  | Gold         | Dijllah Gold Refinery FZC                                       | United Arab Emirates               |
| CID000362  | Gold         | DODUCO Contacts and Refining GmbH                               | Germany                            |
| CID000401  | Gold         | Dowa  | Japan                              |
| CID003195  | Gold         | DS PRETECH Co., Ltd.  | Republic of Korea                  |
| CID000359  | Gold         | DSC (Do Sung Corporation)                                       | Republic of Korea                  |
| CID000425  | Gold         | Eco-System Recycling Co., Ltd.                                  | Japan                              |
| CID002561  | Gold         | Emirates Gold DMCC  | United Arab Emirates               |
| CID002515  | Gold         | Fidelity Printers and Refiners Ltd.                             | Zimbabwe                           |
| CID002584  | Gold         | Fujairah Gold FZC   | United Arab Emirates               |
| CID002459  | Gold         | Geib Refining Corporation                                       | United States                      |
| CID002243  | Gold         | Gold Refinery of Zijin Mining Group Co., Ltd.                   | China                              |
| CID001909  | Gold         | Great Wall Precious Metals Co., Ltd. of CBPM                    | China                              |
| CID002312  | Gold         | Guangdong Jinding Gold Limited                                  | China                              |
| CID002852  | Gold         | Gujarat Gold Centre   | India                              |
| CID000651  | Gold         | Guoda Safina High-Tech Environmental Refinery Co., Ltd.         | China                              |
| CID000671  | Gold         | Hangzhou Fuchunjiang Smelting Co., Ltd.                         | China                              |
| CID000689  | Gold         | HeeSung Metal Ltd.  | China                              |
| CID000694  | Gold         | Heimerle + Meule GmbH   | Germany                            |
| CID000707  | Gold         | Heraeus Metals Hong Kong Ltd.                                   | China                              |
| CID000711  | Gold         | Heraeus Precious Metals GmbH & Co. KG                           | Germany                            |
| CID000767  | Gold         | Hunan Chenzhou Mining Co., Ltd.                                 | China                              |
| CID000773  | Gold         | Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd.             | China                              |
| CID000778  | Gold         | HwaSeong CJ Co., Ltd.   | Republic of Korea                  |
| CID000801  | Gold         | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | China                              |
| CID002562  | Gold         | International Precious Metal Refiners                           | United Arab Emirates               |

| <b>CID</b> | <b>Metal</b> | <b>Smelter Name</b>                                 | <b>Country Location of Smelter</b> |
|------------|--------------|---|------------------------------------|
| CID000807  | Gold         | Ishifuku Metal Industry Co., Ltd.                   | Japan                              |
| CID000814  | Gold         | Istanbul Gold Refinery                              | Turkey                             |
| CID002765  | Gold         | Italpreziosi  | Italy                              |
| CID000823  | Gold         | Japan Mint  | Japan                              |
| CID000855  | Gold         | Jiangxi Copper Co., Ltd.                            | China                              |
| CID000927  | Gold         | JSC Ekaterinburg Non-Ferrous Metal Processing Plant | Russian Federation                 |
| CID000929  | Gold         | JSC Uralelectromed                                  | Russian Federation                 |
| CID000937  | Gold         | JX Nippon Mining & Metals Co., Ltd.                 | Japan                              |
| CID002563  | Gold         | Kaloti Precious Metals                              | United Arab Emirates               |
| CID000956  | Gold         | Kazakhmys Smelting LLC                              | Kazakhstan                         |
| CID000957  | Gold         | Kazzinc   | Kazakhstan                         |
| CID000969  | Gold         | Kennecott Utah Copper LLC                           | United States                      |
| CID002511  | Gold         | KGHM Polska Miedz Spółka Akcyjna                    | Poland                             |
| CID000981  | Gold         | Kojima Chemicals Co., Ltd.                          | Japan                              |
| CID002605  | Gold         | Korea Zinc Co., Ltd.                                | Republic of Korea                  |
| CID001029  | Gold         | Kyrgyzaltyn JSC                                     | Kyrgyzstan                         |
| CID002865  | Gold         | Kyshtym Copper-Electrolytic Plant ZAO               | Russian Federation                 |
| CID001032  | Gold         | L'azurde Company For Jewelry                        | Saudi Arabia                       |
| CID002762  | Gold         | L'Orfebre S.A.                                      | Andorra                            |
| CID001056  | Gold         | Lingbao Gold Co., Ltd.                              | China                              |
| CID001058  | Gold         | Lingbao Jinyuan Tonghui Refinery Co., Ltd.          | China                              |
| CID001078  | Gold         | LS-NIKKO Copper Inc.                                | Republic of Korea                  |
| CID001093  | Gold         | Luoyang Zijin Yinhui Gold Refinery Co., Ltd.        | China                              |
| CID002606  | Gold         | Marsam Metals                                       | Brazil                             |
| CID001113  | Gold         | Materion  | United States                      |
| CID001119  | Gold         | Matsuda Sangyo Co., Ltd.                            | Japan                              |
| CID001149  | Gold         | Metalor Technologies (Hong Kong) Ltd.               | China                              |
| CID001152  | Gold         | Metalor Technologies (Singapore) Pte., Ltd.         | Singapore                          |
| CID001147  | Gold         | Metalor Technologies (Suzhou) Ltd.                  | China                              |
| CID001153  | Gold         | Metalor Technologies S.A.                           | Switzerland                        |

| <b>CID</b> | <b>Metal</b> | <b>Smelter Name</b>   | <b>Country Location of Smelter</b> |
|------------|--------------|---|------------------------------------|
| CID001157  | Gold         | Metalor USA Refining Corporation  | United States                      |
| CID001161  | Gold         | Metalúrgica Met-Mex Peñoles S.A. De C.V.                                    | Mexico                             |
| CID001188  | Gold         | Mitsubishi Materials Corporation  | Japan                              |
| CID001193  | Gold         | Mitsui Mining and Smelting Co., Ltd.  | Japan                              |
| CID002509  | Gold         | MMTC-PAMP India Pvt., Ltd.  | India                              |
| CID002857  | Gold         | Modeltech Sdn Bhd   | Malaysia                           |
| CID002282  | Gold         | Morris and Watson   | New Zealand                        |
| CID001204  | Gold         | Moscow Special Alloys Processing Plant                                      | Russian Federation                 |
| CID001220  | Gold         | Nadir Metal Rafineri San. Ve Tic. A.Ş.                                      | Turkey                             |
| CID001236  | Gold         | Navoi Mining and Metallurgical Combinat                                     | Uzbekistan                         |
| CID003189  | Gold         | NH Recytech Company   | Republic of Korea                  |
| CID001259  | Gold         | Nihon Material Co., Ltd.  | Japan                              |
| CID002779  | Gold         | Ögussa Österreichische Gold- und Silber-Scheideanstalt GmbH                 | Austria                            |
| CID001325  | Gold         | Ohura Precious Metal Industry Co., Ltd.                                     | Japan                              |
| CID001326  | Gold         | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | Russian Federation                 |
| CID000493  | Gold         | OJSC Novosibirsk Refinery   | Russian Federation                 |
| CID001352  | Gold         | PAMP S.A.   | Switzerland                        |
| CID002872  | Gold         | Pease & Curren  | United States                      |
| CID001362  | Gold         | Penglai Penggang Gold Industry Co., Ltd.                                    | China                              |
| CID002919  | Gold         | Planta Recuperadora de Metales SpA  | Chile                              |
| CID001386  | Gold         | Prioksky Plant of Non-Ferrous Metals  | Russian Federation                 |
| CID001397  | Gold         | PT Aneka Tambang (Persero) Tbk  | Indonesia                          |
| CID001498  | Gold         | PX Précinox S.A.  | Switzerland                        |
| CID003324  | Gold         | QG Refining, LLC  | United States                      |
| CID001512  | Gold         | Rand Refinery (Pty) Ltd.  | South Africa                       |
| CID000522  | Gold         | Refinery of Seemine Gold Co., Ltd.  | China                              |
| CID002582  | Gold         | Remondis Argentia B.V.  | Netherlands                        |
| CID001534  | Gold         | Royal Canadian Mint   | Canada                             |

| <b>CID</b> | <b>Metal</b> | <b>Smelter Name</b>  | <b>Country Location of Smelter</b> |
|------------|--------------|--|------------------------------------|
| CID002761  | Gold         | SAAMP  | France                             |
| CID001546  | Gold         | Sabin Metal Corp.  | United States                      |
| CID002973  | Gold         | Safimet S.p.A  | Italy                              |
| CID002290  | Gold         | SAFINA A.S.  | Czech Republic                     |
| CID002853  | Gold         | Sai Refinery   | India                              |
| CID001555  | Gold         | Samduck Precious Metals  | Republic of Korea                  |
| CID001562  | Gold         | SAMWON Metals Corp.  | Republic of Korea                  |
| CID002777  | Gold         | SAXONIA Edelmetalle GmbH   | Germany                            |
| CID001585  | Gold         | SEMPSA Joyería Platería S.A.   | Spain                              |
| CID002525  | Gold         | Shandong Humon Smelting Co., Ltd.                                    | China                              |
| CID001619  | Gold         | Shandong Tiancheng Biological Gold Industrial Co., Ltd.              | China                              |
| CID001622  | Gold         | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.                    | China                              |
| CID001736  | Gold         | Sichuan Tianze Precious Metals Co., Ltd.                             | China                              |
| CID002516  | Gold         | Singway Technology Co., Ltd.   | Taiwan                             |
| CID001756  | Gold         | SOE Shyolkovsky Factory of Secondary Precious Metals                 | Russian Federation                 |
| CID001761  | Gold         | Solar Applied Materials Technology Corp.                             | Taiwan                             |
| CID003383  | Gold         | Sovereign Metals   | India                              |
| CID003153  | Gold         | State Research Institute Center for Physical Sciences and Technology | Lithuania                          |
| CID002567  | Gold         | Sudan Gold Refinery  | Sudan                              |
| CID001798  | Gold         | Sumitomo Metal Mining Co., Ltd.                                      | Japan                              |
| CID002918  | Gold         | SungEel HiMetal Co., Ltd.  | Republic of Korea                  |
| CID002580  | Gold         | T.C.A S.p.A  | Italy                              |
| CID001875  | Gold         | Tanaka Kikinzoku Kogyo K.K.  | Japan                              |
| CID001916  | Gold         | The Refinery of Shandong Gold Mining Co., Ltd.                       | China                              |
| CID001938  | Gold         | Tokuriki Honten Co., Ltd.  | Japan                              |
| CID001947  | Gold         | Tongling Nonferrous Metals Group Co., Ltd.                           | China                              |
| CID002587  | Gold         | Tony Goetz NV  | Belgium                            |
| CID002615  | Gold         | TOO Tau-Ken-Altyn  | Kazakhstan                         |
| CID001955  | Gold         | Torecom  | Republic of Korea                  |

| <b>CID</b> | <b>Metal</b> | <b>Smelter Name</b>                                 | <b>Country Location of Smelter</b> |
|------------|--------------|---|------------------------------------|
| CID001977  | Gold         | Umicore Brasil Ltda.                                | Brazil                             |
| CID002314  | Gold         | Umicore Precious Metals Thailand                    | Thailand                           |
| CID001980  | Gold         | Umicore S.A. Business Unit Precious Metals Refining | Belgium                            |
| CID001993  | Gold         | United Precious Metal Refining, Inc.                | United States                      |
| CID002003  | Gold         | Valcambi S.A.                                       | Switzerland                        |
| CID002030  | Gold         | Western Australian Mint (T/a The Perth Mint)        | Australia                          |
| CID002778  | Gold         | WIELAND Edelmetalle GmbH                            | Germany                            |
| CID002100  | Gold         | Yamakin Co., Ltd.                                   | Japan                              |
| CID002129  | Gold         | Yokohama Metal Co., Ltd.                            | Japan                              |
| CID000197  | Gold         | Yunnan Copper Industry Co., Ltd.                    | China                              |
| CID002224  | Gold         | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | China                              |
| CID000092  | Tantalum     | Asaka Riken Co., Ltd.                               | Japan                              |
| CID000211  | Tantalum     | Changsha South Tantalum Niobium Co., Ltd.           | China                              |
| CID003402  | Tantalum     | CP Metals Inc.                                      | United States                      |
| CID002504  | Tantalum     | D Block Metals, LLC                                 | United States                      |
| CID000456  | Tantalum     | Exotech Inc.  | United States                      |
| CID000460  | Tantalum     | F&X Electro-Materials Ltd.                          | China                              |
| CID002505  | Tantalum     | FIR Metals & Resource Ltd.                          | China                              |
| CID002558  | Tantalum     | Global Advanced Metals Aizu                         | Japan                              |
| CID002557  | Tantalum     | Global Advanced Metals Boyertown                    | United States                      |
| CID000616  | Tantalum     | Guangdong Zhiyuan New Material Co., Ltd.            | China                              |
| CID002544  | Tantalum     | H.C. Starck Co., Ltd.                               | Thailand                           |
| CID002547  | Tantalum     | H.C. Starck Hermsdorf GmbH                          | Germany                            |
| CID002548  | Tantalum     | H.C. Starck Inc.                                    | United States                      |
| CID002549  | Tantalum     | H.C. Starck Ltd.                                    | Japan                              |
| CID002550  | Tantalum     | H.C. Starck Smelting GmbH & Co. KG                  | Germany                            |
| CID002545  | Tantalum     | H.C. Starck Tantalum and Niobium GmbH               | Germany                            |
| CID002492  | Tantalum     | Hengyang King Xing Lifeng New Materials Co., Ltd.   | China                              |
| CID002512  | Tantalum     | Jiangxi Dinghai Tantalum & Niobium Co., Ltd.        | China                              |
| CID002842  | Tantalum     | Jiangxi Tuohong New Raw Material                    | China                              |

| <b>CID</b> | <b>Metal</b> | <b>Smelter Name</b>   | <b>Country Location of Smelter</b> |
|------------|--------------|---|------------------------------------|
| CID000914  | Tantalum     | JiuJiang JinXin Nonferrous Metals Co., Ltd.   | China                              |
| CID000917  | Tantalum     | Jiujiang Tanbre Co., Ltd.   | China                              |
| CID002506  | Tantalum     | Jiujiang Zhongao Tantalum & Niobium Co., Ltd.   | China                              |
| CID002539  | Tantalum     | KEMET Blue Metals   | Mexico                             |
| CID002568  | Tantalum     | KEMET Blue Powder   | United States                      |
| CID001076  | Tantalum     | LSM Brasil S.A.   | Brazil                             |
| CID001163  | Tantalum     | Metallurgical Products India Pvt., Ltd.   | India                              |
| CID001175  | Tantalum     | Mineração Taboca S.A.   | Brazil                             |
| CID001192  | Tantalum     | Mitsui Mining & Smelting  | Japan                              |
| CID001277  | Tantalum     | Ningxia Orient Tantalum Industry Co., Ltd.  | China                              |
| CID001200  | Tantalum     | NPM Silmet AS   | Estonia                            |
| CID002847  | Tantalum     | Power Resources Ltd.  | Macedonia                          |
| CID001508  | Tantalum     | QuantumClean  | United States                      |
| CID002707  | Tantalum     | Resind Indústria e Comércio Ltda.   | Brazil                             |
| CID001522  | Tantalum     | RFH Tantalum Smeltery Co., Ltd./Yanling Jincheng Tantalum & Niobium Co., Ltd.         | China                              |
| CID001769  | Tantalum     | Solikamsk Magnesium Works OAO   | Russian Federation                 |
| CID001869  | Tantalum     | Taki Chemicals  | Japan                              |
| CID001891  | Tantalum     | Telex Metals  | United States                      |
| CID001969  | Tantalum     | Ulba Metallurgical Plant JSC  | Kazakhstan                         |
| CID002508  | Tantalum     | XinXing HaoRong Electronic Material Co., Ltd.   | China                              |
| CID000292  | Tin          | Alpha   | United States                      |
| CID002703  | Tin          | An Vinh Joint Stock Mineral Processing Company  | Vietnam                            |
| CID000228  | Tin          | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.                                     | China                              |
| CID003190  | Tin          | Chifeng Dajingzi Tin Industry Co., Ltd.   | China                              |
| CID001070  | Tin          | China Tin Group Co., Ltd.   | China                              |
| CID003356  | Tin          | Dongguan CiEXPO Environmental Engineering Co., Ltd.                                   | China                              |
| CID000402  | Tin          | Dowa  | Japan                              |
| CID002572  | Tin          | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | Vietnam                            |

| <b>CID</b> | <b>Metal</b> | <b>Smelter Name</b>                              | <b>Country Location of Smelter</b> |
|------------|--------------|--|------------------------------------|
| CID000438  | Tin          | EM Vinto   | Bolivia                            |
| CID000448  | Tin          | Estanho de Rondônia S.A.                         | Brazil                             |
| CID000468  | Tin          | Fenix Metals                                     | Poland                             |
| CID003410  | Tin          | Gejiu City Fuxiang Industry and Trade Co., Ltd.  | China                              |
| CID002848  | Tin          | Gejiu Fengming Metallurgy Chemical Plant         | China                              |
| CID000942  | Tin          | Gejiu Kai Meng Industry and Trade LLC            | China                              |
| CID000538  | Tin          | Gejiu Non-Ferrous Metal Processing Co., Ltd.     | China                              |
| CID001908  | Tin          | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.   | China                              |
| CID000555  | Tin          | Gejiu Zili Mining And Metallurgy Co., Ltd.       | China                              |
| CID003116  | Tin          | Guangdong Hanhe Non-Ferrous Metal Co., Ltd.      | China                              |
| CID002849  | Tin          | Guanyang Guida Nonferrous Metal Smelting Plant   | China                              |
| CID002844  | Tin          | HuiChang Hill Tin Industry Co., Ltd.             | China                              |
| CID000760  | Tin          | Huichang Jinshunda Tin Co., Ltd.                 | China                              |
| CID001231  | Tin          | Jiangxi New Nanshan Technology Ltd.              | China                              |
| CID003379  | Tin          | Ma'anshan Weitai Tin Co., Ltd.                   | China                              |
| CID002468  | Tin          | Magnu's Minerais Metais e Ligas Ltda.            | Brazil                             |
| CID001105  | Tin          | Malaysia Smelting Corporation (MSC)              | Malaysia                           |
| CID002500  | Tin          | Melt Metais e Ligas S.A.                         | Brazil                             |
| CID001142  | Tin          | Metallic Resources, Inc.                         | United States                      |
| CID002773  | Tin          | Metallo Belgium N.V.                             | Belgium                            |
| CID002774  | Tin          | Metallo Spain S.L.U.                             | Spain                              |
| CID001173  | Tin          | Mineração Taboca S.A.                            | Brazil                             |
| CID001182  | Tin          | Minsur   | Peru                               |
| CID001191  | Tin          | Mitsubishi Materials Corporation                 | Japan                              |
| CID002858  | Tin          | Modeltech Sdn Bhd                                | Malaysia                           |
| CID002573  | Tin          | Nghe Tinh Non-Ferrous Metals Joint Stock Company | Vietnam                            |
| CID001314  | Tin          | O.M. Manufacturing (Thailand) Co., Ltd.          | Thailand                           |
| CID002517  | Tin          | O.M. Manufacturing Philippines, Inc.             | Philippines                        |
| CID001337  | Tin          | Operaciones Metalurgical S.A.                    | Bolivia                            |
| CID003208  | Tin          | Pongpipat Company Limited                        | Myanmar                            |

| <b>CID</b> | <b>Metal</b> | <b>Smelter Name</b>                                | <b>Country Location of Smelter</b> |
|------------|--------------|--|------------------------------------|
| CID003409  | Tin          | Precious Minerals and Smelting Limited             | India                              |
| CID001399  | Tin          | PT Artha Cipta Langgeng                            | Indonesia                          |
| CID002503  | Tin          | PT ATD Makmur Mandiri Jaya                         | Indonesia                          |
| CID001453  | Tin          | PT Mitra Stania Prima                              | Indonesia                          |
| CID001460  | Tin          | PT Refined Bangka Tin                              | Indonesia                          |
| CID001463  | Tin          | PT Sariwiguna Binasentosa                          | Indonesia                          |
| CID001468  | Tin          | PT Stanindo Inti Perkasa                           | Indonesia                          |
| CID002816  | Tin          | PT Sukses Inti Makmur                              | Indonesia                          |
| CID001471  | Tin          | PT Sumber Jaya Indah                               | Indonesia                          |
| CID001477  | Tin          | PT Timah (Persero) Tbk Kundur                      | Indonesia                          |
| CID001482  | Tin          | PT Timah (Persero) Tbk Mentok                      | Indonesia                          |
| CID002706  | Tin          | Resind Indústria e Comércio Ltda.                  | Brazil                             |
| CID001539  | Tin          | Rui Da Hung  | Taiwan                             |
| CID001758  | Tin          | Soft Metais Ltda.                                  | Brazil                             |
| CID002756  | Tin          | Super Ligas  | Brazil                             |
| CID002834  | Tin          | Thai Nguyen Mining and Metallurgy Co., Ltd.        | Vietnam                            |
| CID001898  | Tin          | Thaisarco  | Thailand                           |
| CID003325  | Tin          | Tin Technology & Refining                          | United States                      |
| CID002574  | Tin          | Tuyen Quang Non-Ferrous Metals Joint Stock Company | Vietnam                            |
| CID002036  | Tin          | White Solder Metalurgia e Mineração Ltda.          | Brazil                             |
| CID002158  | Tin          | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.      | China                              |
| CID002180  | Tin          | Yunnan Tin Company Limited                         | China                              |
| CID003397  | Tin          | Yunnan Yunfan Non-ferrous Metals Co., Ltd.         | China                              |
| CID000004  | Tungsten     | A.L.M.T. TUNGSTEN Corp.                            | Japan                              |
| CID002833  | Tungsten     | ACL Metais Eireli                                  | Brazil                             |
| CID002502  | Tungsten     | Asia Tungsten Products Vietnam Ltd.                | Vietnam                            |
| CID002513  | Tungsten     | Chenzhou Diamond Tungsten Products Co., Ltd.       | China                              |
| CID002641  | Tungsten     | China Molybdenum Tungsten Co., Ltd.                | China                              |
| CID000258  | Tungsten     | Chongyi Zhangyuan Tungsten Co., Ltd.               | China                              |
| CID000281  | Tungsten     | CNMC (Guangxi) PGMA Co., Ltd.                      | China                              |



| <b>CID</b> | <b>Metal</b> | <b>Smelter Name</b>   | <b>Country Location of Smelter</b> |
|------------|--------------|---|------------------------------------|
| CID003401  | Tungsten     | Fujian Ganmin RareMetal Co., Ltd.                             | China                              |
| CID000499  | Tungsten     | Fujian Jinxin Tungsten Co., Ltd.                              | China                              |
| CID002645  | Tungsten     | Ganzhou Haichuang Tungsten Co., Ltd.                          | China                              |
| CID000875  | Tungsten     | Ganzhou Huaxing Tungsten Products Co., Ltd.                   | China                              |
| CID002315  | Tungsten     | Ganzhou Jiangwu Ferrotungsten Co., Ltd.                       | China                              |
| CID002494  | Tungsten     | Ganzhou Seadragon W & Mo Co., Ltd.                            | China                              |
| CID000568  | Tungsten     | Global Tungsten & Powders Corp.                               | United States                      |
| CID000218  | Tungsten     | Guangdong Xianglu Tungsten Co., Ltd.                          | China                              |
| CID002542  | Tungsten     | H.C. Starck Smelting GmbH & Co. KG                            | Germany                            |
| CID002541  | Tungsten     | H.C. Starck Tungsten GmbH                                     | Germany                            |
| CID000766  | Tungsten     | Hunan Chenzhou Mining Co., Ltd.                               | China                              |
| CID002579  | Tungsten     | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji               | China                              |
| CID000769  | Tungsten     | Hunan Chunchang Nonferrous Metals Co., Ltd.                   | China                              |
| CID003182  | Tungsten     | Hunan Litian Tungsten Industry Co., Ltd.                      | China                              |
| CID002649  | Tungsten     | Hydrometallurg, JSC   | Russian Federation                 |
| CID000825  | Tungsten     | Japan New Metals Co., Ltd.                                    | Japan                              |
| CID002551  | Tungsten     | Jiangwu H.C. Starck Tungsten Products Co., Ltd.               | China                              |
| CID002647  | Tungsten     | Jiangxi Dayu Longxintai Tungsten Co., Ltd.                    | China                              |
| CID002321  | Tungsten     | Jiangxi Gan Bei Tungsten Co., Ltd.                            | China                              |
| CID002313  | Tungsten     | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.         | China                              |
| CID002318  | Tungsten     | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | China                              |
| CID002317  | Tungsten     | Jiangxi Xinsheng Tungsten Industry Co., Ltd.                  | China                              |
| CID002316  | Tungsten     | Jiangxi Yaosheng Tungsten Co., Ltd.                           | China                              |
| CID003408  | Tungsten     | JSC "Kirovgrad Hard Alloys Plant"                             | Russian Federation                 |
| CID000966  | Tungsten     | Kennametal Fallon   | United States                      |
| CID000105  | Tungsten     | Kennametal Huntsville   | United States                      |
| CID003388  | Tungsten     | KGETS Co., Ltd.   | Korea, Republic of                 |
| CID003407  | Tungsten     | Lianyou Metals Co., Ltd.                                      | Taiwan, Province of China          |

| <b>CID</b> | <b>Metal</b> | <b>Smelter Name</b>   | <b>Country Location of Smelter</b> |
|------------|--------------|---|------------------------------------|
| CID002319  | Tungsten     | Malipo Haiyu Tungsten Co., Ltd.                             | China                              |
| CID002543  | Tungsten     | Masan Tungsten Chemical LLC (MTC)                           | Vietnam                            |
| CID002845  | Tungsten     | Moliren Ltd.  | Russian Federation                 |
| CID002589  | Tungsten     | Niagara Refining LLC  | United States                      |
| CID002827  | Tungsten     | Philippine Chuangxin Industrial Co., Inc.                   | Philippines                        |
| CID001889  | Tungsten     | Tejing (Vietnam) Tungsten Co., Ltd.                         | Vietnam                            |
| CID002724  | Tungsten     | Unecha Refractory Metals Plant                              | Russian Federation                 |
| CID002044  | Tungsten     | Wolfram Bergbau und Hütten AG                               | Austria                            |
| CID002843  | Tungsten     | Woltech Korea Co., Ltd.                                     | Republic of Korea                  |
| CID002320  | Tungsten     | Xiamen Tungsten (H.C.) Co., Ltd.                            | China                              |
| CID002082  | Tungsten     | Xiamen Tungsten Co., Ltd.                                   | China                              |
| CID002830  | Tungsten     | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd. | China                              |
| CID002095  | Tungsten     | Xinhai Rendan Shaoguan Tungsten Co., Ltd.                   | China                              |