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

FORM SD Specialized Disclosure Report

ATRICURE, INC.

(Exact name of registrant as specified in charter)

Delaware (State or other jurisdiction of incorporation)

000-51470 (Commission File Number)

34-1940305

(IRS Employer Identification No.)

7555 Innovation Way
Mason, OH
(Address of principal executive offices)

45040

(Zip Code)

M. Andrew Wade

(513) 755-4100

(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:

X Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2017.

Section 1. Conflict Minerals Disclosure

Item 1.01. Conflict Minerals Disclosure and Report

AtriCure, Inc. (AtriCure or the Company) evaluated its products during the year ended December 31, 2017 and determined that certain products manufactured or contracted to be manufactured by the Company contain conflict minerals which are necessary to the functionality or production of such products. As is required, the Company has conducted a good faith reasonable country of origin inquiry (RCOI) designed to determine whether the necessary conflict minerals originated in the Democratic Republic of the Congo (DRC) or an adjoining country or came from recycled or scrap sources.

AtriCure's RCOI process included conducting an inquiry of our direct suppliers using the Conflict-Free Sourcing Initiative's Conflict Minerals Reporting Template. We relied upon our suppliers' representations regarding the origin of their minerals and their smelter data to determine the source of the conflict minerals within our supply chain. Based on the results of our RCOI, we exercised due diligence on the source and chain of custody of the conflict minerals.

The Company has filed a Conflict Minerals Report (CMR). A copy of the Company's CMR is furnished as Exhibit 1.01 to this Form SD and is incorporated herein by reference. A copy of the Company's CMR is also available on the Company's website at www.atricure.com.

Item 1.02 Exhibit

A copy of the Company's Conflict Minerals Report required by Item 1.01 is provided as Exhibit 1.01 hereto.

Section 2. Exhibits

Item 2.01 Exhibits

(d) Exhibits

No. Description

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

SIGNATURES

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

ATRICURE, INC.

Dated: May 29, 2018 By: /s/ M. Andrew Wade

M. Andrew Wade

Senior Vice President and Chief Financial Officer

AtriCure, Inc. Conflict Minerals Report For the Year Ended December 31, 2017

This report for the year ended December 31, 2017 (the Reporting Period) is presented to comply with Rule 13p-1 under the Securities Exchange Act of 1934 (the Rule), the Public Statement on the Effect of the Recent Court of Appeals Decision on the Conflict Minerals Rule issued by the Director of the Division of Corporation Finance of the Securities and Exchange Commission on April 24, 2014 and the Updated Statement on the Effect of the Court of Appeals Decision on the Conflict Minerals Rule issued on April 7, 2017, which states that companies must continue to comply with the requirements of Items 1.01(a) and (b) of Form SD, which require a description of the company's reasonable country of origin inquiry, however, companies will not face enforcement actions if they fail to conduct due diligence on the source and chain of custody of conflict minerals required by Item 1.01(c) of Form SD (collectively, the SEC Statements). The Rule was adopted by the Securities and Exchange Commission (SEC) to implement reporting and disclosure requirements related to conflict minerals as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act). The Rule imposes certain reporting obligations on SEC registrants whose manufactured products contain conflict minerals which are necessary to the functionality or production of their products. Conflict minerals are defined as cassiterite, columbite-tantalite, gold, wolframite, and their derivatives, which are limited to tin, tantalum, tungsten, and gold (collectively, 3TG) for the purposes of this assessment. These requirements apply to all registrants, whatever the geographic origin of the conflict minerals and whether or not they fund armed conflict.

If a registrant can establish that the conflict minerals originated from sources other than the Democratic Republic of the Congo (DRC) or an adjoining country (the Covered Countries), or from recycled and scrap sources, it must submit a Form SD which describes the Reasonable Country of Origin Inquiry (RCOI) completed.

If a registrant has reason to believe that any of the conflict minerals in its supply chain may have originated in the Covered Countries, or if it is unable to determine the country of origin of those conflict minerals, then the issuer must exercise due diligence on the conflict minerals' source and chain of custody. The registrant must annually submit a Conflict Minerals Report (CMR) to the SEC that includes a description of those due diligence measures.

Forward-Looking Statements

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

1. Company Overview

AtriCure, Inc. (the Company, AtriCure, we, or our) is a leading innovator in treatments for atrial fibrillation (Afib) and left atrial appendage (LAA) management. The Company sells cardiac tissue ablation and left atrial appendage occlusion devices to medical centers globally through its direct sales force and distributors. 3TG can be found in certain AtriCure devices. Therefore, certain products that AtriCure manufactures and distributes are subject to the reporting obligations of Rule 13p-1.

2. Products and Facilities Overview

AtriCure's product lines are classified as follows:

Radio Frequency (RF) Ablation Devices. Our Isolator Synergy System and related RF devices, such as our multifunctional pens, along with the COBRA Fusion® Surgical Ablation System and EPi-Sense® Guided Coagulation System with VisiTrax®

Technology represent our primary product lines and currently generate the majority of our revenue. Physicians use these devices to ablate cardiac tissue for the treatment of cardiac arrhythmias in both open and minimally invasive procedures.

<u>cryoICE Cryoablation System.</u> The cryoICE cryoablation system consists of the cryoICE BOX generator along with a range of cryoICE single use and reusable cryosurgery probes. The cryoICE cryoablation system is used to ablate cardiac tissue for the treatment of cardiac arrhythmias and to provide temporary pain relief to thoracic surgery patients via ablation of peripheral nerves.

<u>AtriClip System.</u> Our AtriClip system is designed to occlude the left atrial appendage by mechanically clamping the appendage from the outside, eliminating blood flow between the left atrial appendage and the atrium while avoiding contact with circulating blood.

We manufacture a substantial majority of the disposable and implantable products we sell and generally purchase items that would be deemed capital equipment. Throughout 2017, we inspected, assembled, tested and packaged our products in our facility in Mason, Ohio. Our products are sterilized by third-party sterilizers at their facilities.

3. Conflict Minerals Program

The Company designed its conflict minerals program to conform, in all material respects, to the five-step framework of the 2nd edition of The Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance, the Supplement on Tin, Tantalum, and Tungsten, and the Supplement on Gold, specifically as they relate to our position in the minerals supply chain as a "downstream" company:

- Step 1: Establish strong company management systems
- Step 2: Identify and assess risks in the supply chain
- Step 3: Design and implement a strategy to respond to identified risks
- Step 4: Carry out independent third-party audit of smelter/refiner due diligence practices
- Step 5: Report annually on supply chain due diligence

The Company relied upon multi-stakeholder initiatives that provide verification processes for conflict-free minerals from smelters or refiners who may provide those minerals to companies in our supply chain. The Company, as a purchaser of component parts or finished products, is many steps removed from the mining of conflict minerals. The Company does not purchase raw ore or unrefined conflict minerals and conducts no purchasing activities directly in the Covered Countries.

The statements below are based on the activities performed to date and in good faith by AtriCure and are based on the information available at the time of this filing. Factors that could affect the accuracy of these statements include, but are not limited to, the complexity of the supply chain, incomplete supplier data or available smelter data, errors or omissions by suppliers or smelters, the ability of suppliers to identify smelters, evolving definition and confirmation of smelters, incomplete information from industry or other third-party sources, continuing guidance regarding the SEC final rules and other factors.

4. Due Diligence Process

The following describes the measures taken to reasonably determine the country of origin and to exercise due diligence in the mineral supply chain in conformance with the OECD Due Diligence Guidance.

Step 1: Establish strong company management systems

- a. Conflict minerals team AtriCure established a conflict minerals team that includes individuals from the appropriate departments. The team was structured to ensure critical information reached relevant employees and suppliers.
- b. Supplier engagement AtriCure provided informational materials to our queried suppliers related to the conflict minerals disclosure requirements and conflict minerals compliance.
- c. Company level grievance mechanism AtriCure has established a grievance mechanism as a risk-awareness system for issues, including conflict minerals issues. Stakeholders can communicate directly and confidentially with our compliance officer.
- d. Records management AtriCure will maintain records relating to our conflict minerals program in accordance with the recommended five-year record retention guidelines.

Step 2: Identify and assess risks in the supply chain

- a. Identify products in scope The conflict minerals team conducted a detailed review of the products manufactured or contracted to be manufactured during the Reporting Period to identify products that should be deemed in-scope.
- b. Conduct Reasonable Country of Origin Inquiry (RCOI) AtriCure utilized the industry-developed Conflict Minerals Reporting Template (CMRT) to query suppliers for conflict minerals information. The Company requested this information from the Tier 1 suppliers who provide material and components for the products deemed in-scope by the conflict minerals team. The responses from the templates submitted by our suppliers were evaluated to determine the Company's reporting obligation based on this RCOI.
- c. Completed additional follow-up AtriCure contacted direct suppliers to ensure they responded to the request for conflict minerals information by the requested date. AtriCure also worked to clarify and validate the information provided by certain suppliers, such as distributors.
- d. Identify smelters/processors AtriCure compiled a list of smelters/processors in our supply chain using supplier responses in their CMRTs. The Company reconciled this list to the list of smelter facilities designated by the Conflict-Free Sourcing Initiative's (CFSI) Conflict-Free Smelter Program. We have provided the listing within this report.

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

As part of the risk mitigation process, the Company reconciled the list of smelters collected from suppliers to the list of smelter facilities designated as "conflict free" by the CFSI's Conflict-Free Smelter Program. AtriCure continues to develop the process used to identify suppliers that potentially provide materials and components that contain Conflict Minerals and conduct a good-faith RCOI of its supply chain, including a risk-based evaluation of our suppliers' responses.

Step 4: Carry out independent third-party audit of smelter/refiner due diligence practices

AtriCure is relying on the CFSI's published lists to verify the conflict-free status of smelters/processors that source from Covered Countries. The Company has not been subject to an independent private sector audit in accordance with the SEC Statements.

Step 5: Report annually on supply chain due diligence

AtriCure has determined that a portion of the conflict minerals used to manufacture our products may have originated from the Covered Countries. Accordingly, this Conflict Minerals Report has been filed with the SEC and is available on our website at http://www.atricure.com/.

5. Determination

Based on the information received from our suppliers, the facilities listed in the table below may have been used to process conflict minerals used in certain AtriCure products.

Based on the due diligence measures described above, including the RCOI process, the Company does not have sufficient information to conclusively determine the countries of origin of all the 3TG necessary to the Company's product functionality or production or whether the 3TG used in its products were from recycled or scrap sources or whether or not any conflict minerals may have, in fact, directly or indirectly financed or benefitted any armed groups in a Covered Country.

| Metal | Facility Name | Facility Location |
|-------|---|--------------------------|
| Gold | Abington Reldan Metals, LLC | UNITED STATES OF AMERICA |
| Gold | Advanced Chemical Company | UNITED STATES OF AMERICA |
| Gold | Aida Chemical Industries Co., Ltd. | JAPAN |
| Gold | Al Etihad Gold LLC | UNITED ARAB EMIRATES |
| Gold | Allgemeine Gold-und Silberscheideanstalt A.G. | GERMANY |
| Gold | Almalyk Mining and Metallurgical Complex (AMMC) | UZBEKISTAN |
| Gold | AngloGold Ashanti Corrego do Sitio Mineracao | BRAZIL |
| Gold | Argor-Heraeus S.A. | SWITZERLAND |
| Gold | Asahi Pretec Corp. | JAPAN |
| Gold | Asahi Refining Canada Ltd. | CANADA |
| Gold | Asahi Refining USA Inc. | UNITED STATES OF AMERICA |

| Gold | Asaka Riken Co., Ltd. | JAPAN |
|------|---|--------------------------|
| Gold | Atasay Kuyumculuk Sanayi Ve Ticaret A.S. | TURKEY |
| Gold | AU Traders and Refiners | SOUTH AFRICA |
| Gold | Aurubis AG | GERMANY |
| Gold | Bangalore Refinery | INDIA |
| Gold | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | PHILIPPINES |
| Gold | Boliden AB | SWEDEN |
| Gold | C. Hafner GmbH + Co. KG | GERMANY |
| Gold | Caridad | MEXICO |
| Gold | CCR Refinery - Glencore Canada Corporation | CANADA |
| Gold | Cendres + Metaux S.A. | SWITZERLAND |
| Gold | Chimet S.p.A. | ITALY |
| Gold | China's Shandong Gold Mining Co., Ltd | CHINA |
| Gold | Chugai Mining | JAPAN |
| Gold | Daejin Indus Co., Ltd. | KOREA, REPUBLIC OF |
| Gold | Daye Non-Ferrous Metals Mining Ltd. | CHINA |
| Gold | Degussa Sonne / Mond Goldhandel GmbH | GERMANY |
| Gold | Do Sung Corporation | KOREA, REPUBLIC OF |
| Gold | Doduco | GERMANY |
| Gold | DODUCO Contacts and Refining GmbH | GERMANY |
| Gold | DODUCO GmbH | GERMANY |
| Gold | Dowa | JAPAN |
| Gold | DSC (Do Sung Corporation) | KOREA, REPUBLIC OF |
| Gold | Eco-System Recycling Co., Ltd. | JAPAN |
| Gold | Elemetal Refining, LLC | UNITED STATES OF AMERICA |
| Gold | Emirates Gold DMCC | UNITED ARAB EMIRATES |
| Gold | Fidelity Printers and Refiners Ltd. | ZIMBABWE |
| Gold | FSE Novosibirsk Refinery | RUSSIAN FEDERATION |
| Gold | Gansu Seemine Material Hi-Tech Co., Ltd. | CHINA |
| Gold | GCC Gujrat Gold Centre Pvt. Ltd. | INDIA |
| Gold | Geib Refining Corporation | UNITED STATES OF AMERICA |
| Gold | Gold Refinery of Zijin Mining Group Co., Ltd. | CHINA |
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM | CHINA |
| Gold | Guangdong Jinding Gold Limited | CHINA |
| Gold | Guoda Safina High-Tech Environmental Refinery Co., Ltd. | CHINA |
| Gold | Hangzhou Fuchunjiang Smelting Co., Ltd. | CHINA |
| Gold | HeeSung Metal Ltd. | KOREA, REPUBLIC OF |
| Gold | Heimerle + Meule GmbH | GERMANY |
| Gold | Henan Zhongyuan Gold Refinery Co., Ltd. | CHINA |
| Gold | Heraeus Ltd. Hong Kong | CHINA |
| Gold | Heraeus Metals Hong Kong Ltd. | CHINA |
| Gold | Heraeus Precious Metals GmbH & Co. KG | GERMANY |
| Gold | Hunan Chenzhou Mining Co., Ltd. | CHINA |
| Gold | HwaSeong CJ CO., LTD. | KOREA, REPUBLIC OF |

| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | CHINA |
|------|---|--------------------------|
| Gold | Ishifuku Metal Industry Co., Ltd. | JAPAN |
| Gold | Istanbul Gold Refinery | TURKEY |
| Gold | Italpreziosi | ITALY |
| Gold | Japan Mint | JAPAN |
| Gold | Jiangxi Copper Co., Ltd. | CHINA |
| Gold | Johnson Matthey Inc. | UNITED STATES OF AMERICA |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant | RUSSIAN FEDERATION |
| Gold | JSC Uralelectromed | RUSSIAN FEDERATION |
| Gold | JX Nippon Mining & Metals Co., Ltd. | JAPAN |
| Gold | Kaloti Precious Metals | UNITED ARAB EMIRATES |
| Gold | Kazakhmys Smelting LLC | KAZAKHSTAN |
| Gold | Kazzinc | KAZAKHSTAN |
| Gold | Kennecott Utah Copper LLC | UNITED STATES OF AMERICA |
| Gold | KGHM Polska Miedz Spolka Akcyjna | POLAND |
| Gold | Kojima Chemicals Co., Ltd. | JAPAN |
| Gold | Korea Zinc Co., Ltd. | KOREA, REPUBLIC OF |
| Gold | Kyrgyzaltyn JSC | KYRGYZSTAN |
| Gold | Kyshtym Copper-Electrolytic Plant ZAO | RUSSIAN FEDERATION |
| Gold | L'azurde Company For Jewelry | SAUDI ARABIA |
| Gold | Lingbao Gold Co., Ltd. | CHINA |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd. | CHINA |
| Gold | L'Orfebre S.A. | ANDORRA |
| Gold | LS-NIKKO Copper Inc. | KOREA, REPUBLIC OF |
| Gold | Luoyang Zijin Yinhui Gold Refinery Co., Ltd. | CHINA |
| Gold | Marsam Metals | BRAZIL |
| Gold | Materion | UNITED STATES OF AMERICA |
| Gold | Matsuda Sangyo Co., Ltd. | JAPAN |
| Gold | Metalor Switzerland | SWITZERLAND |
| Gold | Metalor Technologies (Hong Kong) Ltd. | CHINA |
| Gold | Metalor Technologies (Singapore) Pte., Ltd. | SINGAPORE |
| Gold | Metalor Technologies (Suzhou) Ltd. | CHINA |
| Gold | Metalor Technologies S.A. | SWITZERLAND |
| Gold | Metalor USA Refining Corporation | UNITED STATES OF AMERICA |
| Gold | Metalurgica Met-Mex Penoles S.A. De C.V. | MEXICO |
| Gold | Mitsubishi Materials Corporation | JAPAN |
| Gold | Mitsui Mining and Smelting Co., Ltd. | JAPAN |
| Gold | MMTC-PAMP India Pvt., Ltd. | INDIA |
| Gold | Modeltech Sdn Bhd | MALAYSIA |
| Gold | Morris and Watson | NEW ZEALAND |
| Gold | Morris and Watson Gold Coast | AUSTRALIA |
| Gold | Moscow Special Alloys Processing Plant | RUSSIAN FEDERATION |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.Ş. | TURKEY |
| Gold | Navoi Mining and Metallurgical Combinat | UZBEKISTAN |

| Gold | Nihon Material Co., Ltd. | JAPAN |
|------|---|---------------------------|
| Gold | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH | AUSTRIA |
| Gold | Ohio Precious Metals, LLC | UNITED STATES OF AMERICA |
| Gold | Ohura Precious Metal Industry Co., Ltd. | JAPAN |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | RUSSIAN FEDERATION |
| Gold | OJSC Novosibirsk Refinery | RUSSIAN FEDERATION |
| Gold | PAMP S.A. | SWITZERLAND |
| Gold | Pease & Curren | UNITED STATES OF AMERICA |
| Gold | Penglai Penggang Gold Industry Co., Ltd. | CHINA |
| Gold | Planta Recuperadora de Metales SpA | CHILE |
| Gold | Prioksky Plant of Non-Ferrous Metals | RUSSIAN FEDERATION |
| Gold | PT Aneka Tambang (Persero) Tbk | INDONESIA |
| Gold | PX Precinox S.A. | SWITZERLAND |
| Gold | Rand Refinery (Pty) Ltd. | SOUTH AFRICA |
| Gold | Refinery of Seemine Gold Co., Ltd. | CHINA |
| Gold | Remondis Argentia B.V. | NETHERLANDS |
| Gold | Republic Metals Corporation | UNITED STATES OF AMERICA |
| Gold | Royal Canadian Mint | CANADA |
| Gold | SAAMP | FRANCE |
| Gold | Sabin Metal Corp. | UNITED STATES OF AMERICA |
| Gold | Safimet S.p.A | ITALY |
| Gold | SAFINA A.S. | CZECH REPUBLIC |
| Gold | Sai Refinery | INDIA |
| Gold | Samduck Precious Metals | KOREA, REPUBLIC OF |
| Gold | Samwon Metals Corp. | KOREA, REPUBLIC OF |
| Gold | SAXONIA Edelmetalle GmbH | GERMANY |
| Gold | Schone Edelmetaal B.V. | NETHERLANDS |
| Gold | SEMPSA Joyeria Plateria S.A. | SPAIN |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | CHINA |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd. | CHINA |
| Gold | Shangdong Gold (Laizhou) | CHINA |
| Gold | Sichuan Tianze Precious Metals Co., Ltd. | CHINA |
| Gold | Singway Technology Co., Ltd. | TAIWAN, PROVINCE OF CHINA |
| Gold | So Accurate Group, Inc. | UNITED STATES OF AMERICA |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals | RUSSIAN FEDERATION |
| Gold | Solar Applied Materials Technology Corp. | TAIWAN, PROVINCE OF CHINA |
| Gold | State Research Institute Center for Physical Sciences and Technology | LITHUANIA |
| Gold | Sudan Gold Refinery | SUDAN |
| Gold | Sumitomo Metal Mining Co., Ltd. | JAPAN |
| Gold | SungEel HiMetal Co., Ltd. | KOREA, REPUBLIC OF |
| Gold | SungEel HiTech | KOREA, REPUBLIC OF |
| Gold | T.C.A S.p.A | ITALY |
| Gold | Tanaka Electronics (Hong Kong) Pte. Ltd. | JAPAN |

| Gold | Tanaka Kikinzoku Kogyo K.K. | JAPAN |
|----------|---|--------------------------|
| Gold | The Refinery of Shandong Gold Mining Co., Ltd. | CHINA |
| Gold | Tokuriki Honten Co., Ltd. | JAPAN |
| Gold | Tongling Nonferrous Metals Group Co., Ltd. | CHINA |
| Gold | Tony Goetz NV | BELGIUM |
| Gold | TOO Tau-Ken-Altyn | KAZAKHSTAN |
| Gold | Torecom | KOREA, REPUBLIC OF |
| Gold | Umicore Brasil Ltda. | BRAZIL |
| Gold | Umicore Precious Metals Thailand | THAILAND |
| Gold | Umicore S.A. Business Unit Precious Metals Refining | BELGIUM |
| Gold | United Precious Metal Refining, Inc. | UNITED STATES OF AMERICA |
| Gold | Universal Precious Metals Refining Zambia | ZAMBIA |
| Gold | Valcambi S.A. | SWITZERLAND |
| Gold | Western Australian Mint (T/a The Perth Mint) | AUSTRALIA |
| Gold | WIELAND Edelmetalle GmbH | GERMANY |
| Gold | Williams Advanced Materials | UNITED STATES OF AMERICA |
| Gold | Yamakin Co., Ltd. | JAPAN |
| Gold | Yamamoto Precious Metal Co., Ltd. | JAPAN |
| Gold | Yokohama Metal Co., Ltd. | JAPAN |
| Gold | Yunnan Copper Industry Co., Ltd. | CHINA |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | CHINA |
| Tantalum | Asaka Riken Co., Ltd. | JAPAN |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd. | CHINA |
| Tantalum | Conghua Tantalum and Niobium Smeltry | CHINA |
| Tantalum | D Block Metals, LLC | UNITED STATES OF AMERICA |
| Tantalum | Duoluoshan | CHINA |
| Tantalum | Exotech Inc. | UNITED STATES OF AMERICA |
| Tantalum | F&X Electro-Materials Ltd. | CHINA |
| Tantalum | FIR Metals & Resource Ltd. | CHINA |
| Tantalum | Global Advanced Metals Aizu | JAPAN |
| Tantalum | Global Advanced Metals Boyertown | UNITED STATES OF AMERICA |
| Tantalum | Guangdong Rising Rare Metals-EO Materials Ltd. | CHINA |
| Tantalum | Guangdong Zhiyuan New Material Co., Ltd. | CHINA |
| Tantalum | H.C. Starck Co., Ltd. | THAILAND |
| Tantalum | H.C. Starck Hermsdorf GmbH | GERMANY |
| Tantalum | H.C. Starck Inc. | UNITED STATES OF AMERICA |
| Tantalum | H.C. Starck Ltd. | JAPAN |
| Tantalum | H.C. Starck Smelting GmbH & Co. KG | GERMANY |
| Tantalum | H.C. Starck Tantalum and Niobium GmbH | GERMANY |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd. | CHINA |
| Tantalum | Hi-Temp Specialty Metals, Inc. | UNITED STATES OF AMERICA |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd. | CHINA |
| Tantalum | Jiangxi Tuohong New Raw Material | CHINA |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd. | CHINA |
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| Tantalum | Jiujiang Nonferrous Metals Smelting Company Limited | CHINA |
|----------|---|---|
| Tantalum | Jiujiang Tanbre Co., Ltd. | CHINA |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd. | CHINA |
| Tantalum | KEMET Blue Metals | MEXICO |
| Tantalum | KEMET Blue Powder | UNITED STATES OF AMERICA |
| Tantalum | King-Tan Tantalum Industry Ltd. | CHINA |
| Tantalum | LSM Brasil S.A. | BRAZIL |
| Tantalum | Metallurgical Products India Pvt., Ltd. | INDIA |
| Tantalum | Mineracao Taboca S.A. | BRAZIL |
| Tantalum | Mitsui Mining & Smelting | JAPAN |
| Tantalum | Mitsui Mining and Smelting Co., Ltd. | JAPAN |
| Tantalum | Molycorp Silmet A.S. | ESTONIA |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd. | CHINA |
| Tantalum | NPM Silmet AS | ESTONIA |
| Tantalum | Power Resources Ltd. | MACEDONIA, THE FORMER YUGOSLAV REPUBLIC OF |
| Tantalum | QuantumClean | UNITED STATES OF AMERICA |
| Tantalum | Resind Industria e Comercio Ltda. | BRAZIL |
| Tantalum | RFH | CHINA |
| Tantalum | RFH Tantalum Smeltery Co., Ltd./Yanling Jincheng Tantalum & Niobium Co., Ltd. | CHINA |
| Tantalum | RFH Tantalum Smeltry Co., Ltd. | CHINA |
| Tantalum | Solikamsk Magnesium Works OAO | RUSSIAN FEDERATION |
| Tantalum | Taki Chemical Co., Ltd. | JAPAN |
| Tantalum | Taki Chemicals | JAPAN |
| Tantalum | Telex Metals | UNITED STATES OF AMERICA |
| Tantalum | Tranzact, Inc. | UNITED STATES OF AMERICA |
| Tantalum | Ulba | KAZAKHSTAN |
| Tantalum | Ulba Metallurgical Plant JSC | KAZAKHSTAN |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd. | CHINA |
| Tantalum | Yichun Jin Yang Rare Metal Co., Ltd. | CHINA |
| Tantalum | Zhuzhou Cemented Carbide Group | CHINA |
| Tantalum | Zhuzhou Cemented Carbide Group Co., Ltd. | CHINA |
| Tin | Alpha | UNITED STATES OF AMERICA |
| Tin | An Thai Minerals Co., Ltd. | VIETNAM |
| Tin | An Vinh Joint Stock Mineral Processing Company | VIETNAM |
| Tin | Chengfeng Metals Co Pte Ltd | CHINA |
| Tin | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | CHINA |
| Tin | China Tin Group Co., Ltd. | CHINA |
| Tin | China Yunnan Tin Co Ltd. | CHINA |
| Tin | CNMC (Guangxi) PGMA Co., Ltd. | CHINA |
| Tin | Cooperativa Metalurgica de Rondonia Ltda. | BRAZIL |
| Tin | CV Ayi Jaya | INDONESIA |
| Tin | CV Dua Sekawan | INDONESIA |
| Tin | CV Gita Pesona | INDONESIA |

| Tin | CV Nurjanah | INDONESIA |
|-----|---|----------------------------------|
| Tin | CV Serumpun Sebalai | INDONESIA |
| Tin | CV Tiga Sekawan | INDONESIA |
| Tin | CV United Smelting | INDONESIA |
| Tin | CV Venus Inti Perkasa | INDONESIA |
| Tin | Dowa | JAPAN |
| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | VIETNAM |
| Tin | Elmet S.L.U. | SPAIN |
| Tin | EM Vinto | BOLIVIA (PLURINATIONAL STATE OF) |
| Tin | Empressa Nacional de Fundiciones (ENAF) | BOLIVIA (PLURINATIONAL STATE OF) |
| Tin | Estanho de Rondonia S.A. | BRAZIL |
| Tin | Fenix Metals | POLAND |
| Tin | Gejiu Fengming Metallurgy Chemical Plant | CHINA |
| Tin | Gejiu Jinye Mineral Company | CHINA |
| Tin | Gejiu Kai Meng Industry and Trade LLC | CHINA |
| Tin | Gejiu Non-Ferrous Metal Processing Co., Ltd. | CHINA |
| Tin | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | CHINA |
| Tin | Gejiu Zili Mining And Metallurgy Co., Ltd. | CHINA |
| Tin | Guangdong Hanhe Non-Ferrous Metal Co., Ltd. | CHINA |
| Tin | GuangXi China Tin | CHINA |
| Tin | Guanyang Guida Nonferrous Metal Smelting Plant | CHINA |
| Tin | HuiChang Hill Tin Industry Co., Ltd. | CHINA |
| Tin | Huichang Jinshunda Tin Co., Ltd. | CHINA |
| Tin | Jiangxi Ketai Advanced Material Co., Ltd. | CHINA |
| Tin | Jiangxi Nanshan | CHINA |
| Tin | Jiangxi Shunda Huichang Kam Tin Co., Ltd. | CHINA |
| Tin | Kai Unita Trade Limited Liability Company | CHINA |
| Tin | Liuzhhou China Tin | CHINA |
| Tin | Magnu's Minerais Metais e Ligas Ltda. | BRAZIL |
| Tin | Malaysia Smelting Corporation (MSC) | MALAYSIA |
| Tin | Melt Metais e Ligas S.A. | BRAZIL |
| Tin | Metallic Resources, Inc. | UNITED STATES OF AMERICA |
| Tin | Metallo Belgium N.V. | BELGIUM |
| Tin | Metallo Spain S.L.U. | SPAIN |
| Tin | Metallo-Chimique N.V. | BELGIUM |
| Tin | Mineracao Taboca S.A. | BRAZIL |
| Tin | Minsur | PERU |
| Tin | Mitsubishi Materials Corporation | JAPAN |
| Tin | Modeltech Sdn Bhd | MALAYSIA |
| Tin | MSC | MALAYSIA |
| Tin | Nankang Nanshan Tin Manufactory Co., Ltd. | CHINA |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company | VIETNAM |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd. | THAILAND |

| Tin | O.M. Manufacturing Philippines, Inc. | PHILIPPINES |
|-----|---|------------------------------|
| Tin | OMSA | BOLIVIA |
| Tin | Operaciones Metalurgical S.A. | BOLIVIA (PLURINATIONAL STATE |
| T: | DT Asian Manager Chickens | OF) INDONESIA |
| Tin | PT A ries Kencana Sejahtera | |
| Tin | PT Artha Cipta Langgeng | INDONESIA |
| Tin | PT ATD Makmur Mandiri Jaya | INDONESIA |
| Tin | PT Babel Inti Perkasa | INDONESIA |
| Tin | PT Bangka Prima Tin | INDONESIA |
| Tin | PT Bangka Tin Industry | INDONESIA |
| Tin | PT Belitung Industri Sejahtera | INDONESIA |
| Tin | PT Bukit Timah | INDONESIA |
| Tin | PT Cipta Persada Mulia | INDONESIA |
| Tin | PT DS Jaya Abadi | INDONESIA |
| Tin | PT Eunindo Usaha Mandiri | INDONESIA |
| Tin | PT Inti Stania Prima | INDONESIA |
| Tin | PT Justindo | INDONESIA |
| Tin | PT Karimun Mining | INDONESIA |
| Tin | PT Kijang Jaya Mandiri | INDONESIA |
| Tin | PT Lautan Harmonis Sejahtera | INDONESIA |
| Tin | PT Menara Cipta Mulia | INDONESIA |
| Tin | PT Mitra Stania Prima | INDONESIA |
| Tin | PT O.M. Indonesia | INDONESIA |
| Tin | PT Panca Mega Persada | INDONESIA |
| Tin | PT Prima Timah Utama | INDONESIA |
| Tin | PT Refined Bangka Tin | INDONESIA |
| Tin | PT Sariwiguna Binasentosa | INDONESIA |
| Tin | PT Stanindo Inti Perkasa | INDONESIA |
| Tin | PT Sukses Inti Makmur | INDONESIA |
| Tin | PT Sumber Jaya Indah | INDONESIA |
| Tin | PT Tambang Timah | INDONESIA |
| Tin | PT Timah (Persero) Tbk Kundur | INDONESIA |
| Tin | PT Timah (Persero) Tbk Mentok | INDONESIA |
| Tin | PT Tinindo Inter Nusa | INDONESIA |
| Tin | PT Tommy Utama | INDONESIA |
| Tin | Resind Industria e Comercio Ltda. | BRAZIL |
| Tin | Rui Da Hung | TAIWAN |
| Tin | Soft Metais Ltda. | BRAZIL |
| Tin | Super Ligas | BRAZIL |
| Tin | Thailand Smelting & Refining Co Ltd | THAILAND |
| Tin | Thaisarco Thaisarco | THAILAND |
| Tin | Toboca/ Paranapenema | BRAZIL |
| | Tuyen Quang Non-Ferrous Metals Joint Stock Company | VIETNAM |
| Tin | | |
| Tin | VQB Mineral and Trading Group JSC White Solder Metalurgia e Mineracao Ltda. | VIETNAM BRAZIL |

| Tin | Yunnan Chengfeng Non-ferrous Metals Co., Ltd. | CHINA |
|----------|--|---------------------------|
| Tin | Yunnan Tin Company Limited | CHINA |
| Tin | Yunnan wind non - ferrous metals Co., Ltd | CHINA |
| Tin | Yuntinic Resources | CHINA |
| Tungsten | A.L.M.T. TUNGSTEN Corp. | JAPAN |
| Tungsten | ACL Metais Eireli | BRAZIL |
| Tungsten | Asia Tungsten Products Vietnam Ltd. | VIETNAM |
| Tungsten | ATI Tungsten Materials | UNITED STATES OF AMERICA |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd. | CHINA |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd. | CHINA |
| Tungsten | Dayu Weiliang Tungsten Co., Ltd. | CHINA |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd. | CHINA |
| Tungsten | Ganzhou Haichuang Tungsten Industry Co., Ltd. | CHINA |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd. | CHINA |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd. | CHINA |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd. | CHINA |
| Tungsten | Ganzhou Yatai Tungsten Co., Ltd. | CHINA |
| Tungsten | Global Tungsten & Powders Corp. | UNITED STATES OF AMERICA |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd. | CHINA |
| Tungsten | H.C. Starck Smelting GmbH & Co. KG | GERMANY |
| Tungsten | H.C. Starck Tungsten GmbH | GERMANY |
| Tungsten | Hunan Chenzhou Mining Co., Ltd. | CHINA |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji | CHINA |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd. | CHINA |
| Tungsten | Hunan Litian Tungsten Industry Co., Ltd. | CHINA |
| Tungsten | Hydrometallurg, JSC | RUSSIAN FEDERATION |
| Tungsten | Japan New Metals Co., Ltd. | JAPAN |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd. | CHINA |
| Tungsten | Jiangxi Dayu Longxintai Tungsten Co., Ltd. | CHINA |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd. | CHINA |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. | CHINA |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | CHINA |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd. | CHINA |
| Tungsten | Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd. | CHINA |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd. | CHINA |
| Tungsten | Kennametal Fallon | UNITED STATES OF AMERICA |
| Tungsten | Kennametal Huntsville | UNITED STATES OF AMERICA |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd. | CHINA |
| Tungsten | Moliren Ltd. | RUSSIAN FEDERATION |
| Tungsten | Niagara Refining LLC | UNITED STATES OF AMERICA |
| Tungeton | Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC | VIETNAM |
| Tungsten | | |
| Tungsten | Philippine Chuangxin Industrial Co., Inc. | PHILIPPINES |
| | Philippine Chuangxin Industrial Co., Inc. South-East Nonferrous Metal Company Limited of Hengyang City Tejing (Vietnam) Tungsten Co., Ltd. | PHILIPPINES CHINA VIETNAM |

| Tungsten | Unecha Refractory metals plant | RUSSIAN FEDERATION |
|----------|---|--------------------|
| Tungsten | Vietnam Youngsun Tungsten Industry Co., Ltd. | VIETNAM |
| Tungsten | Wolfram Bergbau und Hütten AG | AUSTRIA |
| Tungsten | Woltech Korea Co., Ltd. | KOREA, REPUBLIC OF |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd. | CHINA |
| Tungsten | Xiamen Tungsten Co., Ltd. | CHINA |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd. | CHINA |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd. | CHINA |

6. Future Due Diligence

We will continue to communicate our expectations and information reporting requirements to our direct suppliers. Over time, we anticipate that the amount of information available globally on the traceability and sourcing of these ores will increase and improve our knowledge. We will continue to make inquiries to our direct suppliers and undertake additional risk assessments when potentially relevant changes in facts or circumstances are identified. We expect our suppliers to take similar measures with their suppliers to ensure alignment throughout the supply chain.