

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

FORM SD
Specialized Disclosure Report

日月光投資控股股份有限公司
ASE Technology Holding Co., Ltd.

(Exact name of the registrant as specified in its charter)

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|---|--|--------------------------------------|
| Taiwan, Republic of China (State or other jurisdiction of Incorporation or organization) | 001-16125 (Commission File Number) | (IRS Employer Identification No.) |
| 26 Chin Third Road Nantze Export Processing Zone Nantze, Kaohsiung, Taiwan Republic of China (Address of principal executive offices) | (Zip code) | |
| Joseph Tung 886-2-6636-5678 (Name and telephone number, including area code, of the person to contact in connection with this report.) | | |

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2019.

Section 1 — Conflict Minerals Disclosure

Item 1.01 and 1.02 Conflict Minerals Disclosure and Report, Exhibit

Conflict Minerals Disclosure

Our Form SD and our Conflict Minerals Report for the year ended December 31, 2019 filed as Exhibit 1.01 to this Form SD are available at

http://www.aseglobal.com/en/csr_conflict_minerals_compliance.html

Section 2 – Exhibits

Item 2.01 Exhibits

Exhibit 1.01 – Conflict Minerals Report for the reporting period January 1, 2019 to December 31, 2019

* * * * *

SIGNATURE

ASE Technology Holding Co., Ltd.

By: /s/ Jason C.S. Chang
Jason C.S. Chang
Chief Executive Officer

Date: May 29, 2020

EXHIBIT INDEX

**Exhibit
Number**

Description

| | |
|------|--|
| 1.01 | Conflict Minerals Report for the reporting period January 1, 2019 to December 31, 2019 |
|------|--|

ASE Technology Holding Co., Ltd.

Conflict Minerals Report

For the year ended December 31, 2019

Corporate Overview

ASE Technology Holding Co., Ltd. (“ASEH”, “we”, “our” or “us”) is the leading provider of semiconductor manufacturing services in assembly and testing. ASEH develops and offers complete turnkey solutions covering front-end engineering testing, wafer probing and final testing, as well as IC packaging, materials design and production, and electronic manufacturing services with superior technologies, breakthrough innovations, and advanced development programs.

We have manufacturing facilities located in Taiwan, China, Malaysia, Japan, Singapore, Korea, and America that provide packaging, testing and materials design and production services to many semiconductor companies around the world. A typical customer engagement involves receiving consigned silicon wafers from the customer, performing a series of manufacturing services to the wafers, and delivering a completed, packaged integrated circuit back to the customer.

We provide a broad range of electronic manufacturing services to a global customer base through USI Inc. with facilities located in Taiwan, China, Mexico and Poland. In providing these services, we acquire numerous electronic and non-electronic components, and assemble them into sub-assemblies and finished products.

Product Scope

We determine gold, tin, tungsten or tantalum (“3TG” or “conflict minerals”) are “necessary to the functionality or production” of a product manufactured or contracted to be manufactured by ASEH.

- (1) For our packaging and materials design and production services, we typically add gold and tin as direct materials in the manufacturing process, and we occasionally add tungsten and tantalum. We do not use gold, tin, tungsten or tantalum in our testing services.
- (2) For our electronic manufacturing services, typical materials and components which we utilize include solder (tin based), electrolytic capacitors (tantalum bearing), integrated circuits (gold wire) and high temperature wires (tungsten). Gold, tin, tungsten and tantalum are essential to our electronic manufacturing services.

All packaging, materials design and production and electronic manufacturing services we provide contain one or more of the conflict minerals: gold, tin, tungsten or tantalum.

Reasonable Country of Origin Inquiry (RCOI)

We conducted a reasonable country of origin inquiry (“RCOI”) to determine whether 3TG have originated in the Democratic Republic of the Congo (“DRC”) or its adjoining countries (the “Covered Countries”), or are from recycled or scrap sources.

Our RCOI included to:

- (1) Identify our suppliers who provided us with materials containing 3TG and then use the Conflict Minerals Reporting Template (“CMRT”) developed by the Responsible Minerals Initiative (“RMI”) to facilitate transparency of the supply chain regarding 3TG sourced from the smelters and refiners.

We identified 539 suppliers in the reporting period and used the CMRTs to identify the Smelters or Refiners (“SoRs”) of 3TG and their origin countries.

- (i) For our packaging and materials design and production services, a total of 187 suppliers provided us with materials containing 3TG.
 - (ii) For our electronic manufacturing services, we selected 352 suppliers from a total of 1,463 suppliers who provided us with materials containing metals by the following assessment criteria: (1) the suppliers with purchase amounts greater than US\$0.49 million in 2019, which in aggregate accounted for more than 95% of our total purchase amount, and (2) the suppliers whose conflict minerals are used in the services we provide to our top three customers.
- (2) Confirm with our suppliers that they are in compliance with our conflict minerals policy and their covenant to disclose the source information of the smelters and refiners under the representation letters.

Based on our RCOI results, we have reason to believe that the conflict minerals in our products may have originated in the Covered Countries or may not come from recycled or scrap sources. Therefore, we conducted due diligence on the source and chain of custody of the conflict minerals in our products.

Below are the results of our RCOI.

Packaging and Materials Design and Production Services

Gold

During 2019, we purchased gold for our packaging and materials design and production services from a total of 109 suppliers. None of these suppliers are SoRs, and all these suppliers purchased gold from SoRs or from third parties. Based on the CMRTs we collected, we identified a total of 106 SoRs from which we indirectly purchased gold in 2019 for our packaging and materials design and production services. All 109 of our gold suppliers for our packaging and materials design and production services responded to our request to identify the SoRs from which they sourced gold during 2019, representing 100% of our total gold expenditure.

Based on an inspection of the list available at www.responsiblemineralsinitiative.org/ conducted on December 31, 2019, all 106 SoRs from which we indirectly purchased gold in 2019 for our packaging and materials design and production services are participants in at least one of (i) the Responsible Minerals Assurance Process (“RMAP”) operated by RMI, (ii) the Gold Industry—London Bullion Market Association (“LBMA”), or (iii) the Gold Industry—Responsible Jewellery Council (“RJC”).

Tin

During 2019, we purchased tin for our packaging and materials design and production services from a total of 107 suppliers. None of these suppliers are SoRs, and all these suppliers purchased tin from SoRs or from other third parties. Based on the CMRTs we collected, we identified a total of 79 SoRs from which we indirectly purchased tin in 2019 for our packaging and materials design and production services. All 107 of our tin suppliers for our packaging and materials design and production services responded to our request to identify the SoRs from which they sourced tin during 2019, representing 100% of our total tin expenditure.

Based on an inspection of the list available at www.responsiblemineralsinitiative.org/ conducted on December 31, 2019, all 79 SoRs from which we indirectly purchased tin in 2019 for our packaging and materials design and production services are participants in the RMAP operated by RMI.

Tungsten

During 2019, we purchased tungsten for our packaging and materials design and production services from a total of 36 suppliers. None of these suppliers are SoRs, and all these suppliers purchased tungsten from SoRs or from other third parties. Based on the CMRTs we collected, we identified 45 SoRs from which we indirectly purchased tungsten for our packaging and materials design and production services in 2019. All 36 of our tungsten suppliers for our packaging and materials design and production services responded to our request to identify the SoRs from which they sourced tungsten during 2019, representing 100% of our total tungsten expenditure.

Based on an inspection of the list available at www.responsiblemineralsinitiative.org/ conducted on December 31, 2019, all 45 SoRs from which we indirectly purchased tungsten for our packaging and materials design and production services in 2019 are participants in the RMAP operated by RMI or participants in the Tungsten Industry—Conflict Minerals Council (“TI-CMC”).

Tantalum

During 2019, we purchased tantalum for our packaging and materials design and production services from 27 suppliers. None of these suppliers are SoRs, and all these suppliers purchased tantalum from SoRs or from other third parties. Based on the CMRTs we collected, we identified a total of 41 SoRs from which we indirectly purchased tantalum in 2019 for our packaging and materials design and production services. All 27 of our tantalum suppliers for our packaging and materials design and production services responded to our request to identify the SoRs from which they sourced tantalum during 2019, representing 100% of our total tantalum expenditure.

Based on an inspection of the list available at www.responsiblemineralsinitiative.org/ conducted on December 31, 2019, all 41 of the SoRs from which we indirectly purchased tantalum in 2019 for our packaging and materials design and production services are participants in the RMAP operated by RMI.

Electronic Manufacturing Services

During the reporting period, we selected 352 suppliers from a total of 1,463 suppliers for our electronic manufacturing services for the purpose of identifying SoRs. The 352 suppliers were selected based on the assessment criteria mentioned in the section entitled RCOI.

Gold

Among the 352 selected suppliers, we purchased gold for our electronic manufacturing services from 271 suppliers in 2019. None of these suppliers are SoRs, and all these suppliers purchased gold from SoRs or from other third parties. Based on the CMRTs we collected, we identified 105 SoRs from which we indirectly purchased gold for our electronic manufacturing services. All 271 gold suppliers responded to our request to identify the SoRs from which they sourced gold during 2019.

Based on an inspection of the list available at www.responsiblemineralsinitiative.org/ conducted on December 31, 2019, all 105 SoRs from which we indirectly purchased gold for our electronic manufacturing services in 2019 are participants in at least one of (i) the RMAP operated by RMI, (ii) the LBMA, or (iii) the RJC.

Tin

Among the 352 selected suppliers, we purchased tin for our electronic manufacturing services from 311 suppliers in 2019. None of these suppliers are SoRs, and all these suppliers purchased tin from SoRs or from other third parties. Based on the CMRTs we collected, we identified 79 SoRs from which we indirectly purchased tin for our electronic manufacturing services. All 311 tin suppliers responded to our request to identify the SoRs from which they sourced tin during 2019.

Based on an inspection of the list available at www.responsiblemineralsinitiative.org/ conducted on December 31, 2019, all 79 SoRs from which we indirectly purchased tin for our electronic manufacturing services in 2019 are participants in the RMAP operated by RMI.

Tungsten

Among the 352 selected suppliers, we purchased tungsten for our electronic manufacturing services from 150 suppliers in 2019. None of these suppliers are SoRs, and all these suppliers purchased tungsten from SoRs or from other third parties. Based on the CMRTs we collected, we identified 45 SoRs from which we indirectly purchased tungsten for our electronic manufacturing services. All 150 tungsten suppliers responded to our request to identify the SoRs from which they sourced tungsten during 2019.

Based on an inspection of the list available at www.responsiblemineralsinitiative.org/ conducted on December 31, 2019, all 45 SoRs from which we indirectly purchased tungsten for our electronic

manufacturing services in 2019 are participants in either the RMAP operated by RMI or the TI-CMC program.

Tantalum

Among the 352 selected suppliers, we purchased tantalum for our electronic manufacturing services from 111 suppliers in 2019. None of these suppliers are SoRs, and all these suppliers purchased tantalum from SoRs or from other third parties. Based on the CMRTs we collected, we identified 41 SoRs from which we indirectly purchased tantalum for our electronic manufacturing services. All 111 tantalum suppliers responded to our request to identify the SoRs from which they sourced tantalum during 2019.

Based on an inspection of the list available at www.responsiblemineralsinitiative.org/ conducted on December 31, 2019, all 41 SoRs from which we indirectly purchased tantalum for our electronic manufacturing services in 2019 are participants in the RMAP operated by RMI.

Part I. Due Diligence

Design of Due Diligence

ASEH designed its due diligence measures to conform to the Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition (the “OECD Guidance”), including the related supplements on gold, tin, tantalum and tungsten.

Due Diligence Measures Performed

| OECD Step 1 | Establish strong company management systems |
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| A. Adopt and clearly communicate to suppliers and public | <p>The <i>ASE Technology Holding Co., Ltd. Corporate Policy for Sourcing Conflict Minerals</i> is posted on our website (and attached here as Annex A) to address our commitment to exercise due diligence in accordance with the OECD Guidance.</p> <p>Additionally, we distribute our conflict minerals policy to each of our suppliers of conflict minerals who must agree that the policy will be complied with and required each supplier to certify they understand our conflict minerals policy and will comply with its covenants.</p> |
| B. Structure internal management to support due diligence | <p>Our conflict minerals management team is a comprehensive cross-functional team under the direction of our Chief Operating Officer (“COO”).</p> <p>The team is responsible for implementing the conflict minerals compliance mechanism, including planning, analysis, tracking, monitoring, and communication and reporting for the business wide initiative.</p> |
| C. Establish a system of controls and transparency over the mineral supply chain | <p>Conflict minerals procedures are documented in our specifications system and managed by our conflict minerals management team. The bills-of-materials required for different customer products across all manufacturing operations are controlled by our manufacturing execution system software.</p> <p>The primary method for gathering conflict mineral data is through the deployment and gathering of Responsible Minerals Initiative (“RMI”), which is developed by Conflict Minerals Reporting Template (“CMRT”). We store such data and maintain other related records for a minimum of five years in a comprehensive filing system.</p> <p>Aligned with industry practice, we utilize a conflict minerals data tool to manage a large number of suppliers’ CMRTs, auto-validates smelter status with updated RMI smelter list and aggregates smelter reporting for our</p> |

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| | customers. |
| D. Strengthen company engagement with suppliers | <p>ASEH’s subsidiaries communicate our conflict minerals policy and requirements to relevant suppliers through our website. In addition to the website, ASEH’s subsidiaries are building person-to-person links between employees and suppliers to improve the quality and consistency of supplier communications.</p> <p>ASEH’s subsidiaries hold several supplier seminars/workshops at multiple manufacturing facilities to announce new requirements, and provide training to suppliers to enable them to better understand how to improve their conflict minerals monitoring mechanism, including smelter data quality.</p> <p>We amended and added conflict minerals terms to our subsidiaries’ <i>Purchase Orders</i> pursuant to which our suppliers agree (i) to use industry standard efforts to ensure 3TG materials covered by the purchase order and sourced from mines in the DRC or the Covered Countries do not directly or indirectly finance illegal militia in the above-mentioned area, (ii) to promptly notify us if any materials covered by the purchase order do contain conflict minerals that are not DRC Conflict Free and to provide a report on the mine and/or smelter of origin of the conflict minerals and the related chain of custody and (iii) to only supply us with materials that contain DRC Conflict Free minerals sourced from certified DRC Conflict Free smelter and refinery programs.</p> |
| E. Establish grievance mechanism | <p>ASEH encourages suppliers and employees to have open and honest dialog on issues of mutual interest.</p> <p>We provide three email addresses for our subsidiaries (ASE_CM@aseglobal.com, petition@spil.com.tw and conflict_minerals@usiglobal.com) for general surveys, inquiries and grievances regarding our conflict minerals program. Our conflict mineral mechanism can also be found on our website (http://www.aseglobal.com/en/csr_conflict_minerals_compliance.html).</p> |
| OECD Step 2 | Identify and assess risk in the supply chain |
| A. Identify risks in the supply chain | <p>Our process for identifying conflict minerals risk in the supply chain is as follows:</p> <ul style="list-style-type: none"> (a) Identify all our suppliers who provide direct materials and components which may contain conflict minerals being necessary to the functionality or production of our products. (b) Conduct an annual suppliers’ survey through the CMRTs to identify the SoRs and the origin countries of conflict minerals. (c) Review each received CMRT based on our internal standard procedure to |

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| | <p>check the quality such as the suppliers’ conflict minerals policies, suppliers’ data collection from next tier suppliers, and SoRs identification and disclosure.</p> <p>(d) For our electronic manufacturing services, depending on the complexity of the supply chain, we:</p> <ul style="list-style-type: none"> • Assess the value of the annual purchase volume of all conflict minerals. • Prioritize conflict mineral sources by dollar volume to leverage impact from available analytical resources. |
| B. Assess risks of adverse impacts | <p>(a) Assess data gathered on the CMRTs to identify potential inconsistencies or “red flags.”</p> <p>(b) Define annual supplier risk criteria.</p> <p>(c) Carry out on-site or document audit for suppliers determined as at-risk suppliers according to the risk criteria.</p> <p>(d) Follow up as appropriate to resolve items of concern.</p> |
| OECD Step 3 | Design and implement a strategy to respond to identified risks |
| A. Report finding to designated senior management | <p>Periodic reviews are held and status are reported to our COO, Chief Financial Officer (“CFO”) and Chief Administrator Officer (“CAO”) who are also our Corporate Sustainability Committee members and senior management in order for them to be aware of current conflict minerals compliance status.</p> |
| B. Devise and adopt a risk management plan | <p>Our risk management plan includes tracking SoRs information to check if they may be from DRC or the Covered Countries, or not from scrap or recycled sources.</p> <p>We compare supplier smelter data to RMI RCOI data to identify actual smelter origins.</p> <p>Additionally, ASEH’s subsidiaries developed their own conflict minerals audit checklists to implement an on-site or document audit process. ASEH’s subsidiaries are required to validate suppliers’ mechanisms related to important aspects of conflict minerals management.</p> <p>Finally, we continue to work with non-compliant suppliers to obtain RMAP certification, or other independence third party audit program. Suppliers unwilling or incapable of achieving such certification are considered to be replaced by compliant suppliers.</p> |
| C. Implement the risk management plan, monitor and track performance of risk mitigation efforts and | <p>We use CMRTs and the up-to-date RMAP compliant smelter lists to monitor and track our suppliers and their SoRs information. For compliance year 2019, our packaging and materials design and production services received CMRTs from 100% of our conflict minerals suppliers surveyed and electronic manufacturing services received CMRTs from 100% of our conflict</p> |

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| report back to designated senior management | <p>minerals suppliers surveyed.</p> <p>We request our suppliers to provide an updated response of their CMRTs if there is any change. We maintain a regular communication channel with our senior management as mentioned above.</p> |
| D. Undertake additional fact and risk assessments for risks requiring mitigation, or after a change of circumstances | <p>We have begun supplier audits to assess the accuracy of data and statements made by larger suppliers. This program will be broadened over time.</p> <p>As a member of the RBA and RMI, RCOI data is accessible to use and to manage our suppliers' SoRs information.</p> |
| OECD Step 4 | Carry out independent third-party audit of supply chain due diligence at identified points in the supply chain |
| | <p>For the Compliance Year 2019, ASEH has undertaken an Independent Private Sector Audit ("IPSA") of our Conflict Minerals Report in compliance with the requirements set forth in the SEC Conflict Minerals Final Rule and subsequent SEC Guidance.</p> <p>As a member of RMI, we leverage the due diligence conducted on smelters by the RMAP which uses independent third-party auditors to audit the source of the conflict minerals used by smelters.</p> |
| OECD Step 5 | Report on supply chain due diligence. |
| | <p>We report annually on our supply chain due diligence activities including the conflict minerals program in our annual sustainability report and we file a Form SD and Conflict Minerals Report ("CMR") for Compliance Year 2019 with the US Securities and Exchange Commission on or before the May 31, 2020 deadline in compliance with the SEC Conflict Minerals Final Rule and subsequent guidance. This information is publicly available on our company website at http://www.aseglobal.com/en/csr_conflict_minerals_compliance.html</p> |

Part II. Due Diligence Determination and Product Declaration

Product Declaration

Our RCOI results did not provide us a sufficient level of confidence to enable us to report that all our products are conflict-free. Pursuant to Rule 13p-1 under the Securities Exchange Act of 1934, we therefore conducted additional due diligence on the source and chain of custody of the necessary conflict minerals in our products in order to obtain reasonable and reliable evidence that the gold, tin, tungsten or tantalum used by us in 2019 either (i) did not directly or indirectly benefit violent organizations in the Democratic Republic of the Congo or adjacent regions or (ii) came from recycled or scrap sources.

Based on our RCOI analysis and due diligence measures described in this report, we made the following product determinations.

Packaging and Materials Design and Production Services:

Based on the CMRTs we received, all identified SoRs used in our packaging and materials design and production services products were certified by RMI or were in the process of receiving RMI certificates in 2019. We reasonably believe that such SoRs are DRC Conflict-Free.

Electronic Manufacturing Services:

Given the large number of suppliers for our electronic manufacturing services, we developed a sampling program to select material suppliers for the purpose of identifying SoRs. We believe that our due diligence performed based on the sampling program is sufficient and appropriate to provide a reasonable basis for our determination. Based on the CMRTs we received, all identified SoRs used in our electronic manufacturing services products were certified by RMI or were in the process of receiving RMI certificates in 2019. Therefore, we reasonably believe that such SoRs are DRC Conflict-Free.

Glossary

A glossary of abbreviations and terms is included in Annex C.

Facilities used to Process Conflict Minerals

A list of smelters and refiners that sourced conflict minerals utilized in our services is provided in Annex D.

Conflict Minerals Country of Origin

A list of countries where conflict minerals were mined or extracted is listed in Annex E. These minerals may have been smelted or refined in the country of extraction or in facilities around the world.

Part III – Future Due Diligence Improvements

- Continue to improve our conflict minerals process for new suppliers.
- Continue to work with our suppliers to confirm that they understand and comply with ASEH's conflict minerals policy and requirements.
- Work with our suppliers to ensure that the smelters and refiners they source conflict minerals from in our supply chain are actively participating or progressing toward RMAP listing or other independence third party audit programs.
- Assess suppliers' due diligence processes through on-site audits so as to assist suppliers to build up and improve their internal management systems.
- Enhance our conflict minerals data tool with advanced management and analysis functionalities.
- Annually hold supplier seminars to assist suppliers with their conflict minerals programs.

Part IV – Independent Private Sector Audit

We obtained an independent private sector audit by KPMG. The independent accountant's report is set forth in Annex B.

Annex A –ASE Technology Holding Co., Ltd. Corporate Policy for Sourcing Conflict Minerals

The mining and distribution of “conflict minerals”¹ originating from the Democratic Republic of the Congo (the “DRC”) are sometimes controlled by violent organizations in order to fund conflict in that country and adjacent regions. Our industry supply chains are inadvertently subject to metals derived from these conflict minerals which can be introduced through the metals we use such as gold, tin, tantalum and tungsten. ASE Technology Holding Co., Ltd. and its subsidiaries (collectively, “ASE Technology Holding”) is dedicated to the elimination of these conflict minerals in our supply chain and to using only responsibly sourced “conflict-free minerals”². We expect our suppliers to source conflict-free minerals from smelters or refineries that have been certified by an independent third party audit program to fulfill our objective. It is also our objective to support the continued use of conflict-free minerals from the DRC and its adjacent regions such that responsible mining is not diminished. We exercise due diligence with our suppliers on the origin and supply chain of minerals in accordance with the “OECD Due Diligence for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas” to establish conflict minerals management mechanism.

All suppliers to ASE Technology Holding must support this policy by:

- (a) Being diligent in their assessment and validation of their supply chains to ensure ASE Technology Holding’s objectives of a transparent supply chain and conflict-free purchases are inputs to the services and products we produce.
- (b) Be in compliance at all times with all regional and international regulations for conflict minerals.
- (c) Be in compliance at all times with industry standards for the sourcing and reporting of conflict minerals.
- (d) Being diligent and accurate in their formal assurances of conflict-free minerals provided to us.

¹ Conflict minerals are columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives as defined in the Dodd-Frank Act section 1502 and SEC Rule 13p-1 under the Securities Exchange Act of 1934.

² Conflict-free minerals are conflict minerals that through their distribution directly or indirectly do not benefit violent organizations in the Democratic Republic of the Congo and its adjacent regions.

Annex B –Independent Accountants’ Report

Independent Accountants’ Report

To the Board of Directors and Shareholders of ASE Technology Holding Co., Ltd.:

We have examined:

- whether the design of ASE Technology Holding Co., Ltd. (the “Company”) due diligence framework as set forth in the section titled “Part I. Due Diligence” of the Company’s Conflict Minerals Report for the reporting period from January 1 to December 31, 2019 (the “Conflict Minerals Report”), is in conformity, in all material respects, with the criteria set forth in the Organisation of Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition 2016 (“OECD Due Diligence Guidance”), and
- whether the Company’s description of the due diligence measures it performed, as set forth in the section titled “Part I. Due Diligence” of the Company’s Conflict Minerals Report, is consistent, in all material respects, with the due diligence process that the Company undertook.

Management from the Company is responsible for the design of the Company’s due diligence framework and the description of the Company’s due diligence measures set forth in the Conflict Minerals Report, and performance of the due diligence measures. Our responsibility is to express an opinion on the design of the Company’s due diligence framework and on the description of the due diligence measures the Company performed, based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and the standards applicable to attestation engagements contained in Government Auditing Standards, issued by the Comptroller General of the United States. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether the design of the Company’s due diligence framework is in conformity with the OECD Due Diligence Guidance and whether the description of the due diligence measures the Company performed is consistent with the due diligence process that the Company undertook, in all material respects. An examination involves performing procedures to obtain evidence about the design of the Company’s due diligence framework and the description of the due diligence measures the Company performed. The nature, timing and extent of the procedures selected depend on our professional judgment, including an assessment of the risks of material misstatement of the design of the Company’s due diligence framework and the description of the due diligence measures the Company performed. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

Our examination was not conducted for the purpose of evaluating:

- The consistency of the due diligence measures that the Company performed with either the design of the Company’s due diligence framework or the OECD Due Diligence Guidance;
- The completeness of the Company’s description of the due diligence measures performed;
- The suitability of the design or operating effectiveness of the Company’s due diligence process;
- Whether a third party can determine from the Conflict Minerals Report if the due diligence

measures the Company performed are consistent with the OECD Due Diligence Guidance;

- The Company's reasonable country of origin inquiry (RCOI), including the suitability of the design of the RCOI, its operating effectiveness, or the results thereof; or
- The Company's conclusions about the source or chain of custody of its conflict minerals, those products subject to due diligence, or the DRC Conflict Free status of its products.

Accordingly, we do not express an opinion or any other form of assurance on the aforementioned matters or any other matters included in any section of the Conflict Minerals Report other than the section titled "Part I. Due Diligence."

In our opinion,

- the design of the Company's due diligence framework for the reporting period from January 1 to December 31, 2019, as set forth in the Company's Conflict Minerals Report, is in conformity, in all material respects, with the OECD Due Diligence Guidance, and
- the Company's description of the due diligence measures it performed for the reporting period from January 1 to December 31, 2019 as set forth in its Conflict Minerals Report, is consistent, in all material respects, with the due diligence process that the Company undertook.

/s/ KPMG

Taipei, Taiwan (the Republic of China)

May 29, 2020

Annex C – Glossary

| Term | Explanation |
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| ASEH | ASE Technology Holding Co., Ltd. |
| CMRT | Conflict Minerals Reporting Template |
| DRC Conflict-Free | DRC Conflict-free minerals are conflict minerals that, through their mining or distribution, directly or indirectly, do not benefit violent organizations in the Democratic Republic of the Congo and its adjacent regions |
| GeSI | Global e-Sustainability Initiative |
| LBMA | London Bullion Market Association |
| OECD | Organisation for Economic Co-operation and Development |
| RBA | Responsible Business Alliance |
| RCOI | Reasonable Country of Origin Inquiry |
| RJC | Responsible Jewellery Council |
| RMAP | Responsible Minerals Assurance Process |
| RMI | Responsible Minerals Initiative |
| SoRs | Smelters or Refiners |
| TI-CMC | Tungsten Industry—Conflict Minerals Council |

Annex D – Smelter List

| Metal | Smelter Identification Number | Smelter or Refiner Name | Smelter Country |
|--------------|--------------------------------------|---|--------------------------|
| Gold | CID000015 | Advanced Chemical Company | UNITED STATES OF AMERICA |
| Gold | CID000019 | Aida Chemical Industries Co., Ltd. | JAPAN |
| Gold | CID000035 | Allgemeine Gold-und Silberscheideanstalt A.G. | GERMANY |
| Gold | CID000041 | Almalyk Mining and Metallurgical Complex (AMMC) | UZBEKISTAN |
| Gold | CID000058 | AngloGold Ashanti Corrego do Sitio Mineracao | BRAZIL |
| Gold | CID000077 | Argor-Heraeus S.A. | SWITZERLAND |
| Gold | CID000082 | Asahi Pretec Corp. | JAPAN |
| Gold | CID000090 | Asaka Riken Co., Ltd. | JAPAN |
| Gold | CID000113 | Aurubis AG | GERMANY |
| Gold | CID000128 | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | PHILIPPINES |
| Gold | CID000157 | Boliden AB | SWEDEN |
| Gold | CID000176 | C. Hafner GmbH + Co. KG | GERMANY |
| Gold | CID000185 | CCR Refinery - Glencore Canada Corporation | CANADA |
| Gold | CID000189 | Cendres + Metaux S.A. | SWITZERLAND |
| Gold | CID000233 | Chimet S.p.A. | ITALY |
| Gold | CID000264 | Chugai Mining | JAPAN |
| Gold | CID000328 | Daejin Indus Co., Ltd. | KOREA, REPUBLIC OF |
| Gold | CID000359 | DSC (Do Sung Corporation) | KOREA, REPUBLIC OF |
| Gold | CID000362 | DODUCO Contacts and Refining GmbH | GERMANY |
| Gold | CID000401 | Dowa | JAPAN |
| Gold | CID000425 | Eco-System Recycling Co., Ltd. | JAPAN |
| Gold | CID000493 | OJSC Novosibirsk Refinery | RUSSIAN FEDERATION |
| Gold | CID000689 | HeeSung Metal Ltd. | KOREA, REPUBLIC OF |
| Gold | CID000694 | Heimerle + Meule GmbH | GERMANY |
| Gold | CID000707 | Heraeus Metals Hong Kong Ltd. | CHINA |
| Gold | CID000711 | Heraeus Precious Metals GmbH & Co. KG | GERMANY |
| Gold | CID000801 | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | CHINA |
| Gold | CID000807 | Ishifuku Metal Industry Co., Ltd. | JAPAN |
| Gold | CID000814 | Istanbul Gold Refinery | TURKEY |
| Gold | CID000823 | Japan Mint | JAPAN |
| Gold | CID000855 | Jiangxi Copper Co., Ltd. | CHINA |
| Gold | CID000920 | Asahi Refining USA Inc. | UNITED STATES OF AMERICA |

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| Gold | CID000924 | Asahi Refining Canada Ltd. | CANADA |
| Gold | CID000929 | JSC Uralelectromed | RUSSIAN FEDERATION |
| Gold | CID000937 | JX Nippon Mining & Metals Co., Ltd. | JAPAN |
| Gold | CID000957 | Kazzinc | KAZAKHSTAN |
| Gold | CID000969 | Kennecott Utah Copper LLC | UNITED STATES OF AMERICA |
| Gold | CID000981 | Kojima Chemicals Co., Ltd. | JAPAN |
| Gold | CID001029 | Kyrgyzaltyn JSC | KYRGYZSTAN |
| Gold | CID001078 | LS-NIKKO Copper Inc. | KOREA, REPUBLIC OF |
| Gold | CID001113 | Materion | UNITED STATES OF AMERICA |
| Gold | CID001119 | Matsuda Sangyo Co., Ltd. | JAPAN |
| Gold | CID001147 | Metalor Technologies (Suzhou) Ltd. | CHINA |
| Gold | CID001149 | Metalor Technologies (Hong Kong) Ltd. | CHINA |
| Gold | CID001152 | Metalor Technologies (Singapore) Pte., Ltd. | SINGAPORE |
| Gold | CID001153 | Metalor Technologies S.A. | SWITZERLAND |
| Gold | CID001157 | Metalor USA Refining Corporation | UNITED STATES OF AMERICA |
| Gold | CID001161 | Metalurgica Met-Mex Penoles S.A. De C.V. | MEXICO |
| Gold | CID001188 | Mitsubishi Materials Corporation | JAPAN |
| Gold | CID001193 | Mitsui Mining and Smelting Co., Ltd. | JAPAN |
| Gold | CID001204 | Moscow Special Alloys Processing Plant | RUSSIAN FEDERATION |
| Gold | CID001220 | Nadir Metal Rafineri San. Ve Tic. A.S. | TURKEY |
| Gold | CID001259 | Nihon Material Co., Ltd. | JAPAN |
| Gold | CID001325 | Ohura Precious Metal Industry Co., Ltd. | JAPAN |
| Gold | CID001326 | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | RUSSIAN FEDERATION |
| Gold | CID001352 | PAMP S.A. | SWITZERLAND |
| Gold | CID001386 | Prioksky Plant of Non-Ferrous Metals | RUSSIAN FEDERATION |
| Gold | CID001397 | PT Aneka Tambang (Persero) Tbk | INDONESIA |
| Gold | CID001498 | PX Precinox S.A. | SWITZERLAND |
| Gold | CID001512 | Rand Refinery (Pty) Ltd. | SOUTH AFRICA |
| Gold | CID001534 | Royal Canadian Mint | CANADA |
| Gold | CID001555 | Samduck Precious Metals | KOREA, REPUBLIC OF |
| Gold | CID001585 | SEMPA Joyeria Plateria S.A. | SPAIN |
| Gold | CID001622 | Shandong Zhaojin Gold & Silver Refinery Co., Ltd. | CHINA |
| Gold | CID001736 | Sichuan Tianze Precious Metals Co., Ltd. | CHINA |
| Gold | CID001756 | SOE Shyolkovsky Factory of Secondary Precious Metals | RUSSIAN FEDERATION |

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| Gold | CID001761 | Solar Applied Materials Technology Corp. | TAIWAN |
| Gold | CID001798 | Sumitomo Metal Mining Co., Ltd. | JAPAN |
| Gold | CID001875 | Tanaka Kikinzoku Kogyo K.K. | JAPAN |
| Gold | CID001916 | The Refinery of Shandong Gold Mining Co., Ltd. | CHINA |
| Gold | CID001938 | Tokuriki Honten Co., Ltd. | JAPAN |
| Gold | CID001955 | Torecom | KOREA, REPUBLIC OF |
| Gold | CID001977 | Umicore Brasil Ltda. | BRAZIL |
| Gold | CID001980 | Umicore S.A. Business Unit Precious Metals Refining | BELGIUM |
| Gold | CID001993 | United Precious Metal Refining, Inc. | UNITED STATES OF AMERICA |
| Gold | CID002003 | Valcambi S.A. | SWITZERLAND |
| Gold | CID002030 | Western Australian Mint (T/a The Perth Mint) | AUSTRALIA |
| Gold | CID002100 | Yamakin Co., Ltd. | JAPAN |
| Gold | CID002129 | Yokohama Metal Co., Ltd. | JAPAN |
| Gold | CID002224 | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | CHINA |
| Gold | CID002243 | Gold Refinery of Zijin Mining Group Co., Ltd. | CHINA |
| Gold | CID002290 | SAFINA A.S. | CZECHIA |
| Gold | CID002314 | Umicore Precious Metals Thailand | THAILAND |
| Gold | CID002459 | Geib Refining Corporation | UNITED STATES OF AMERICA |
| Gold | CID002509 | MMTC-PAMP India Pvt., Ltd. | INDIA |
| Gold | CID002511 | KGHM Polska Miedz Spolka Akcyjna | POLAND |
| Gold | CID002516 | Singway Technology Co., Ltd. | TAIWAN |
| Gold | CID002560* | Al Etihad Gold Refinery DMCC | UNITED ARAB EMIRATES |
| Gold | CID002561 | Emirates Gold DMCC | UNITED ARAB EMIRATES |
| Gold | CID002580 | T.C.A S.p.A | ITALY |
| Gold | CID002582 | REMONDIS PMR B.V. | NETHERLANDS |
| Gold | CID002605 | Korea Zinc Co., Ltd. | KOREA, REPUBLIC OF |
| Gold | CID002606 | Marsam Metals | BRAZIL |
| Gold | CID002761 | SAAMP | FRANCE |
| Gold | CID002762 | L'Orfebre S.A. | ANDORRA |
| Gold | CID002763 | 8853 S.p.A. | ITALY |
| Gold | CID002765 | Italpreziosi | ITALY |
| Gold | CID002777 | SAXONIA Edelmetalle GmbH | GERMANY |
| Gold | CID002778 | WIELAND Edelmetalle GmbH | GERMANY |
| Gold | CID002779 | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH | AUSTRIA |
| Gold | CID002850 | AU Traders and Refiners | SOUTH AFRICA |
| Gold | CID002863 | Bangalore Refinery | INDIA |

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| Gold | CID002918 | SungEel HiMetal Co., Ltd. | KOREA, REPUBLIC OF |
| Gold | CID002919 | Planta Recuperadora de Metales SpA | CHILE |
| Gold | CID002973 | Safimet S.p.A | ITALY |
| Gold | CID003195 | DS PRETECH Co., Ltd. | KOREA, REPUBLIC OF |
| Tin | CID000228 | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | CHINA |
| Tin | CID000292 | Alpha | UNITED STATES OF AMERICA |
| Tin | CID000306 | CV Gita Pesona | INDONESIA |
| Tin | CID000309 | PT Aries Kencana Sejahtera | INDONESIA |
| Tin | CID000313 | PT Premium Tin Indonesia | INDONESIA |
| Tin | CID000315 | CV United Smelting | INDONESIA |
| Tin | CID000402 | Dowa | JAPAN |
| Tin | CID000438 | EM Vinto | BOLIVIA (PLURINATIONAL STATE OF) |
| Tin | CID000468 | Fenix Metals | POLAND |
| Tin | CID000538 | Gejiu Non-Ferrous Metal Processing Co., Ltd. | CHINA |
| Tin | CID000555 | Gejiu Zili Mining And Metallurgy Co., Ltd. | CHINA |
| Tin | CID000760 | Huichang Jinshunda Tin Co., Ltd. | CHINA |
| Tin | CID000942 | Gejiu Kai Meng Industry and Trade LLC | CHINA |
| Tin | CID001070 | China Tin Group Co., Ltd. | CHINA |
| Tin | CID001105 | Malaysia Smelting Corporation (MSC) | MALAYSIA |
| Tin | CID001142 | Metallic Resources, Inc. | UNITED STATES OF AMERICA |
| Tin | CID001173 | Mineracao Taboca S.A. | BRAZIL |
| Tin | CID001182 | Minsur | PERU |
| Tin | CID001191 | Mitsubishi Materials Corporation | JAPAN |
| Tin | CID001231 | Jiangxi New Nanshan Technology Ltd. | CHINA |
| Tin | CID001314 | O.M. Manufacturing (Thailand) Co., Ltd. | THAILAND |
| Tin | CID001337 | Operaciones Metalurgicas S.A. | BOLIVIA (PLURINATIONAL STATE OF) |
| Tin | CID001399 | PT Artha Cipta Langgeng | INDONESIA |
| Tin | CID001402 | PT Babel Inti Perkasa | INDONESIA |
| Tin | CID001406 | PT Babel Surya Alam Lestari | INDONESIA |
| Tin | CID001419 | PT Bangka Tin Industry | INDONESIA |
| Tin | CID001421 | PT Belitung Industri Sejahtera | INDONESIA |
| Tin | CID001428 | PT Bukit Timah | INDONESIA |
| Tin | CID001434 | PT DS Jaya Abadi | INDONESIA |
| Tin | CID001448 | PT Karimun Mining | INDONESIA |
| Tin | CID001453 | PT Mitra Stania Prima | INDONESIA |
| Tin | CID001457 | PT Panca Mega Persada | INDONESIA |
| Tin | CID001458 | PT Prima Timah Utama | INDONESIA |

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| Tin | CID001460 | PT Refined Bangka Tin | INDONESIA |
| Tin | CID001463 | PT Sariwiguna Binasentosa | INDONESIA |
| Tin | CID001468 | PT Stanindo Inti Perkasa | INDONESIA |
| Tin | CID001471 | PT Sumber Jaya Indah | INDONESIA |
| Tin | CID001477 | PT Timah Tbk Kundur | INDONESIA |
| Tin | CID001482 | PT Timah Tbk Mentok | INDONESIA |
| Tin | CID001490 | PT Tinindo Inter Nusa | INDONESIA |
| Tin | CID001493 | PT Tommy Utama | INDONESIA |
| Tin | CID001539 | Rui Da Hung | TAIWAN |
| Tin | CID001758 | Soft Metais Ltda. | BRAZIL |
| Tin | CID001898 | Thaisarco | THAILAND |
| Tin | CID001908 | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | CHINA |
| Tin | CID002036 | White Solder Metalurgia e Mineracao Ltda. | BRAZIL |
| Tin | CID002158 | Yunnan Chengfeng Non-ferrous Metals Co., Ltd. | CHINA |
| Tin | CID002180 | Yunnan Tin Company Limited | CHINA |
| Tin | CID002455 | CV Venus Inti Perkasa | INDONESIA |
| Tin | CID002468 | Magnu's Minerai's Metais e Ligas Ltda. | BRAZIL |
| Tin | CID002478 | PT Tirus Putra Mandiri | INDONESIA |
| Tin | CID002500 | Melt Metais e Ligas S.A. | BRAZIL |
| Tin | CID002503 | PT ATD Makmur Mandiri Jaya | INDONESIA |
| Tin | CID002517 | O.M. Manufacturing Philippines, Inc. | PHILIPPINES |
| Tin | CID002530 | PT Inti Stania Prima | INDONESIA |
| Tin | CID002570 | CV Ayi Jaya | INDONESIA |
| Tin | CID002592 | CV Dua Sekawan | INDONESIA |
| Tin | CID002593 | PT Rajehan Ariq | INDONESIA |
| Tin | CID002706 | Resind Industria e Comercio Ltda. | BRAZIL |
| Tin | CID002773 | Metallo Belgium N.V. | BELGIUM |
| Tin | CID002774 | Metallo Spain S.L.U. | SPAIN |
| Tin | CID002776 | PT Bangka Prima Tin | INDONESIA |
| Tin | CID002816 | PT Sukses Inti Makmur | INDONESIA |
| Tin | CID002829 | PT Kijang Jaya Mandiri | INDONESIA |
| Tin | CID002834 | Thai Nguyen Mining and Metallurgy Co., Ltd. | VIET NAM |
| Tin | CID002835 | PT Menara Cipta Mulia | INDONESIA |
| Tin | CID002844 | HuiChang Hill Tin Industry Co., Ltd. | CHINA |
| Tin | CID002848 | Gejiu Fengming Metallurgy Chemical Plant | CHINA |
| Tin | CID002849 | Guanyang Guida Nonferrous Metal Smelting Plant | CHINA |
| Tin | CID002870** | PT Lautan Harmonis Sejahtera | INDONESIA |

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| Tin | CID003116 | Guangdong Hanhe Non-Ferrous Metal Co., Ltd. | CHINA |
| Tin | CID003190 | Chifeng Dajingzi Tin Industry Co., Ltd. | CHINA |
| Tin | CID003205 | PT Bangka Serumpun | INDONESIA |
| Tin | CID003325 | Tin Technology & Refining | UNITED STATES OF AMERICA |
| Tin | CID003356 | Dongguan CiEXPO Environmental Engineering Co., Ltd. | CHINA |
| Tin | CID003379 | Ma'anshan Weitai Tin Co., Ltd. | CHINA |
| Tin | CID003381 | PT Rajawali Rimba Perkasa | INDONESIA |
| Tin | CID003397 | Yunnan Yunfan Non-ferrous Metals Co., Ltd. | CHINA |
| Tin | CID003409 | Precious Minerals and Smelting Limited | INDIA |
| Tantalum | CID000092 | Asaka Riken Co., Ltd. | JAPAN |
| Tantalum | CID000211 | Changsha South Tantalum Niobium Co., Ltd. | CHINA |
| Tantalum | CID000291 | Guangdong Rising Rare Metals-EO Materials Ltd. | CHINA |
| Tantalum | CID000456 | Exotech Inc. | UNITED STATES OF AMERICA |
| Tantalum | CID000460 | F&X Electro-Materials Ltd. | CHINA |
| Tantalum | CID000616 | Guangdong Zhiyuan New Material Co., Ltd. | CHINA |
| Tantalum | CID000914 | JiuJiang JinXin Nonferrous Metals Co., Ltd. | CHINA |
| Tantalum | CID000917 | Jiujiang Tanbre Co., Ltd. | CHINA |
| Tantalum | CID001076 | LSM Brasil S.A. | BRAZIL |
| Tantalum | CID001163 | Metallurgical Products India Pvt., Ltd. | INDIA |
| Tantalum | CID001175 | Mineracao Taboca S.A. | BRAZIL |
| Tantalum | CID001192 | Mitsui Mining and Smelting Co., Ltd. | JAPAN |
| Tantalum | CID001200 | NPM Silmet AS | ESTONIA |
| Tantalum | CID001277 | Ningxia Orient Tantalum Industry Co., Ltd. | CHINA |
| Tantalum | CID001508 | QuantumClean | UNITED STATES OF AMERICA |
| Tantalum | CID001522 | RFH Tantalum Smeltery Co., Ltd./Yanling Jincheng Tantalum & Niobium Co., Ltd. | CHINA |
| Tantalum | CID001769 | Solikamsk Magnesium Works OAO | RUSSIAN FEDERATION |
| Tantalum | CID001869 | Taki Chemical Co., Ltd. | JAPAN |
| Tantalum | CID001891 | Telex Metals | UNITED STATES OF AMERICA |
| Tantalum | CID001969 | Ulba Metallurgical Plant JSC | KAZAKHSTAN |
| Tantalum | CID002492 | Hengyang King Xing Lifeng New Materials Co., Ltd. | CHINA |
| Tantalum | CID002504 | D Block Metals, LLC | UNITED STATES OF AMERICA |
| Tantalum | CID002505 | FIR Metals & Resource Ltd. | CHINA |

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| Tantalum | CID002506 | Jiujiang Zhongao Tantalum & Niobium Co., Ltd. | CHINA |
| Tantalum | CID002508 | XinXing HaoRong Electronic Material Co., Ltd. | CHINA |
| Tantalum | CID002512 | Jiangxi Dinghai Tantalum & Niobium Co., Ltd. | CHINA |
| Tantalum | CID002539 | KEMET Blue Metals | MEXICO |
| Tantalum | CID002544 | H.C. Starck Co., Ltd. | THAILAND |
| Tantalum | CID002545 | H.C. Starck Tantalum and Niobium GmbH | GERMANY |
| Tantalum | CID002547 | H.C. Starck Hermsdorf GmbH | GERMANY |
| Tantalum | CID002548 | H.C. Starck Inc. | UNITED STATES OF AMERICA |
| Tantalum | CID002549 | H.C. Starck Ltd. | JAPAN |
| Tantalum | CID002550 | H.C. Starck Smelting GmbH & Co. KG | GERMANY |
| Tantalum | CID002557 | Global Advanced Metals Boyertown | UNITED STATES OF AMERICA |
| Tantalum | CID002558 | Global Advanced Metals Aizu | JAPAN |
| Tantalum | CID002568 | KEMET Blue Powder | UNITED STATES OF AMERICA |
| Tantalum | CID002707 | Resind Industria e Comercio Ltda. | BRAZIL |
| Tantalum | CID002842 | Jiangxi Tuohong New Raw Material | CHINA |
| Tantalum | CID002847 | Power Resources Ltd. | MACEDONIA, THE FORMER YUGOSLAV REPUBLIC OF |
| Tantalum | CID003191 | Jiujiang Janny New Material Co., Ltd. | CHINA |
| Tantalum | CID003402 | CP Metals Inc. | UNITED STATES OF AMERICA |
| Tungsten | CID000004 | A.L.M.T. Corp. | JAPAN |
| Tungsten | CID000105 | Kennametal Huntsville | UNITED STATES OF AMERICA |
| Tungsten | CID000218 | Guangdong Xianglu Tungsten Co., Ltd. | CHINA |
| Tungsten | CID000258 | Chongyi Zhangyuan Tungsten Co., Ltd. | CHINA |
| Tungsten | CID000499 | Fujian Jinxin Tungsten Co., Ltd. | CHINA |
| Tungsten | CID000568 | Global Tungsten & Powders Corp. | UNITED STATES OF AMERICA |
| Tungsten | CID000766 | Hunan Chenzhou Mining Co., Ltd. | CHINA |
| Tungsten | CID000769 | Hunan Chunchang Nonferrous Metals Co., Ltd. | CHINA |
| Tungsten | CID000825 | Japan New Metals Co., Ltd. | JAPAN |
| Tungsten | CID000875 | Ganzhou Huaxing Tungsten Products Co., Ltd. | CHINA |
| Tungsten | CID000966 | Kennametal Fallon | UNITED STATES OF AMERICA |
| Tungsten | CID001889 | Tejing (Vietnam) Tungsten Co., Ltd. | VIET NAM |
| Tungsten | CID002044 | Wolfram Bergbau und Hutten AG | AUSTRIA |
| Tungsten | CID002082 | Xiamen Tungsten Co., Ltd. | CHINA |
| Tungsten | CID002095 | Xinhai Rendan Shaoguan Tungsten Co., Ltd. | CHINA |
| Tungsten | CID002315 | Ganzhou Jiangwu Ferrotungsten Co., Ltd. | CHINA |

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| Tungsten | CID002316 | Jiangxi Yaosheng Tungsten Co., Ltd. | CHINA |
| Tungsten | CID002317 | Jiangxi Xinsheng Tungsten Industry Co., Ltd. | CHINA |
| Tungsten | CID002318 | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | CHINA |
| Tungsten | CID002319 | Malipo Haiyu Tungsten Co., Ltd. | CHINA |
| Tungsten | CID002320 | Xiamen Tungsten (H.C.) Co., Ltd. | CHINA |
| Tungsten | CID002321 | Jiangxi Gan Bei Tungsten Co., Ltd. | CHINA |
| Tungsten | CID002494 | Ganzhou Seadragon W & Mo Co., Ltd. | CHINA |
| Tungsten | CID002502** | Asia Tungsten Products Vietnam Ltd. | VIET NAM |
| Tungsten | CID002513 | Chenzhou Diamond Tungsten Products Co., Ltd. | CHINA |
| Tungsten | CID002541 | H.C. Starck Tungsten GmbH | GERMANY |
| Tungsten | CID002542 | H.C. Starck Smelting GmbH & Co. KG | GERMANY |
| Tungsten | CID002543 | Masan Tungsten Chemical LLC (MTC) | VIET NAM |
| Tungsten | CID002551 | Jiangwu H.C. Starck Tungsten Products Co., Ltd. | CHINA |
| Tungsten | CID002579 | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji | CHINA |
| Tungsten | CID002589 | Niagara Refining LLC | UNITED STATES OF AMERICA |
| Tungsten | CID002645 | Ganzhou Haichuang Tungsten Co., Ltd. | CHINA |
| Tungsten | CID002647 | Jiangxi Dayu Longxintai Tungsten Co., Ltd. | CHINA |
| Tungsten | CID002649 | Hydrometallurg, JSC | RUSSIAN FEDERATION |
| Tungsten | CID002724 | Unecha Refractory metals plant | RUSSIAN FEDERATION |
| Tungsten | CID002827 | Philippine Chuangxin Industrial Co., Inc. | PHILIPPINES |
| Tungsten | CID002830 | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd. | CHINA |
| Tungsten | CID002833 | ACL Metais Eireli | BRAZIL |
| Tungsten | CID002843 | Woltech Korea Co., Ltd. | KOREA, REPUBLIC OF |
| Tungsten | CID002845 | Moliren Ltd. | RUSSIAN FEDERATION |
| Tungsten | CID003182 | Hunan Litian Tungsten Industry Co., Ltd. | CHINA |
| Tungsten | CID003388 | KGETS Co., Ltd. | KOREA, REPUBLIC OF |
| Tungsten | CID003401 | Fujian Ganmin RareMetal Co., Ltd. | CHINA |
| Tungsten | CID003407 | Lianyou Metals Co., Ltd. | TAIWAN |
| Tungsten | CID003408 | JSC "Kirovgrad Hard Alloys Plant" | RUSSIAN FEDERATION |

* During 2019, CID002560 SoR was participating in the Extended Corrective Action Plan and was non-conformant to RMAP standards as of December 31, 2019. We took immediate action in order to resolve items of concern by encouraging the refiner to complete Extended Corrective Action Plan and re-apply for compliance, and we maintained a regular communication channel to continue working

with non-compliant supplier. As of the date we undertook an Independent Private Sector Audit (“IPSA”) of our Conflict Minerals Report in 2020, the SoR has been relisted in the Conformant List.

**CID002870 & CID002502 SoRs were determined to be in ASEH’s conflict minerals supply chain as of December 31, 2019. However, such SoRs were subsequently found to be inoperative during 2019.

Annex E – Countries of Origin of Conflict Minerals

It is likely that we used conflict minerals from many of the following sources as well as some that are not identified.

| | | | |
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| Argentina | Ethiopia | Mongolia | Swaziland |
| Australia | France | Mozambique | Taiwan |
| Austria | Germany | Myanmar | Tanzania |
| Benin | Ghana | Namibia | Thailand |
| Bolivia | Guinea | Nicaragua | Togo |
| Bolivia (Plurinational State of) | Guyana | Niger | Uganda |
| Brazil | India | Nigeria | United Kingdom of Great Britain and Northern Ireland |
| Burundi | Indonesia | Peru | United States of America |
| Canada | Japan | Portugal | Uzbekistan |
| Chile | Laos | R/S | Venezuela |
| China | Madagascar | Russian Federation | Vietnam |
| Colombia | Malaysia | Rwanda | Zimbabwe |
| Congo, Democratic Republic of the Congo | Mali | Sierra Leone | |
| Ecuador | Mauritania | Somaliland | |
| Eritrea | Mexico | Spain | |