

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

**FORM SD**  
Specialized Disclosure Report

**HARMONIC INC.**  
(Exact name of Registrant as specified in its charter)

<b>Delaware</b> (State or other jurisdiction of incorporation or organization)	<b>000-25826</b> Commission File Number	<b>77-0201147</b> (I.R.S. Employer Identification Number)
<b>4300 North First Street, San Jose, CA</b> (Address of principal offices)		<b>95134</b> (Zip code)
<b>Timothy C. Chu</b> (Name and telephone number, including area code, of the person to contact in connection with this report.)		<b>(408) 542-2500</b>

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, 2013.
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## **Section 1 – Conflict Minerals Disclosure**

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

Harmonic Inc. (“Harmonic”, “we” or “our”) conducted an analysis of its products and determined that almost all of the products that we manufacture or contract to manufacture (the “Covered Products”) contain gold, columbite-tantalite (coltan), cassiterite and/or wolframite, including their derivatives which are limited to tantalum, tin and tungsten (together, “3TG” or “Conflict Minerals”). Thereafter, we undertook in good faith a reasonable country of origin inquiry (“RCOI”) reasonably designed to determine if any 3TG originated in the Democratic Republic of Congo (the “DRC”), the Republic of Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola (collectively, the “Covered Countries”) and whether any of the 3TG may be from recycled or scrap sources with respect to products: (i) for which 3TG are necessary to the functionality or production of that product; (ii) that were manufactured, or contracted to be manufactured, by Harmonic; and (iii) for which the manufacture was completed during calendar year 2013.

Based on our RCOI, we were unable to determine that the 3TG did not originate in the Covered Countries, or if our 3TG came from recycled or scrap sources.

After performing the RCOI, we implemented a diligence process designed to conform with the OECD Guidance in order to exercise due diligence on the source and chain of custody of the Conflict Minerals.

After performing the RCOI and due diligence, because we were unable to comprehensively determine the origin of all Conflict Minerals used in our products, the facilities used to process them, their country of origin, and their mine or location of origin, whether or not they came from recycled or scrap resources, we concluded that our products are “DRC Conflict Undeterminable” with regard to calendar year 2013.

A copy of Harmonic’s Conflict Minerals Report is provided as Exhibit 1.02 hereto and is publicly available at [www.harmonicinc.com](http://www.harmonicinc.com) under "About Us - Global Citizenship."

### **Item 1.02 Exhibit**

As specified in Section 2, Item 2.01 of this Form SD, Harmonic is hereby filing its Conflict Minerals Report as Exhibit 1.02 to this Form SD.

## **Section 2 - Exhibits**

The following exhibit is filed as part of this Form SD.

### **Item 2.01 Exhibits**

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

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SIGNATURES

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

Date: June 2, 2014

HARMONIC INC.

By: /s/ Charles Bonasera  
Charles Bonasera  
Senior Vice President, Operations

**Harmonic Inc.**  
**Conflict Minerals Report**  
**For The Year Ended December 31, 2013**

This Conflict Minerals Report (“CMR”) of Harmonic Inc. (“Harmonic”) for the calendar year ended December 31, 2013 is presented to comply with Rule 13p-1 under the Securities Exchange Act of 1934 (the “Rule”). Unless otherwise defined herein, please refer to the Rule, our Specialized Disclosure Report on Form SD and SEC Release No. 34-67716 issued by the Securities and Exchange Commission on August 22, 2012 for definitions to the terms used in this Report.

The Rule requires disclosure of certain information when a company manufactures or contracts to manufacture products and the minerals specified in the Rule are necessary to the functionality or production of those products (“Covered Products”). The specified minerals referred to as “Conflict Minerals” or “3TG” are gold, columbite-tantalite (coltan), cassiterite and wolframite, including their derivatives which are limited to tantalum, tin and tungsten. The “Covered Countries” for purposes of the Rule and this Report are the Democratic Republic of Congo (the “DRC”), the Republic of Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola.

## **1. COMPANY OVERVIEW**

We design, manufacture and sell versatile and high performance video infrastructure products and system solutions that enable our customers to efficiently create, prepare and deliver a full range of video services to consumer devices, including televisions, personal computers, laptops, tablets and smart phones. We sell video processing and production and playout solutions and services worldwide to broadcast and media companies, streaming new media companies, cable operators and satellite and telecommunications pay-TV service providers. We sell cable edge and Converged Cable Access Protocol (CCAP) solutions and related services to cable operators globally.

The information in this CMR includes the activities of all majority-owned subsidiaries and variable interest entities that are required to be consolidated. It does not include the activities of variable interest entities that are not required to be consolidated. This report is available on our website at <http://www.harmonicinc.com/sites/default/files/cmr-report-2013.pdf>.

Harmonic products are manufactured by our third party contractors using full turnkey electronic manufacturing services (“EMS”). Materials and components used in our products are purchased by our third party contractors from third party suppliers. Harmonic does not purchase raw ore or unrefined conflict minerals directly from other parties and makes no direct purchases in the Covered Countries. We rely on our suppliers, whose components contain 3TG, to provide us with information about the source of Conflict Minerals. Our suppliers are similarly reliant upon information provided by their suppliers. Many of our largest suppliers are also SEC registrants and subject to the Rule.

## **2. DESIGN OF DUE DILIGENCE**

In accordance with the five-step guidelines of the Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Second Edition, and related supplements on gold, tin, tantalum and tungsten (collectively, the “OECD Guidance”), the design of our due diligence includes, but is not limited to, the following five steps:

- (i) establishment of strong company management systems;
- (ii) identification and assessment of risks in the supply chain;
- (iii) designing and implementing a strategy to respond to identified risks;
- (iv) supporting the development and implementation of independent third party audits of smelters’ and refiners’ sourcing; and
- (v) reporting on supply chain due diligence.

A description of certain activities undertaken by us in respect of each of the five steps of the OECD Guidance is described below.

## **2.1 Management Systems**

### *2.1.1 Conflict Mineral Policy*

Harmonic has adopted a Conflict Minerals Policy which is attached to this report as [Annex 1](#), and posted on our website at <http://harmonicinc.com/content/conflict-minerals-policy>. This website address is included for reference only. The information contained on Harmonic's website is not incorporated by reference into this CMR.

### *2.1.2 Internal Team*

Harmonic has established a Conflict Minerals Reporting Oversight Committee that includes the Senior Director of Corporate Quality, Senior Corporate Counsel, the Director of Supply Chain Management sponsored by the Senior Vice President of Operations, as well as executive-level representatives and a team of subject matter experts from relevant functions such as Regulatory Compliance, Engineering, and Sales. Led by the Conflict Minerals program manager, the team of subject matter experts is responsible for implementing our Conflict Minerals compliance strategy. Our senior management is regularly briefed on the results of our due diligence efforts.

### *2.1.3 Control Systems*

As we do not typically have a direct relationship with 3TG smelters and refiners, we are engaged and actively communicate with our EMS providers and their suppliers. We participate in the Electronics Industry Citizenship Coalition - Global e-Sustainability Initiative's (EICC-GeSI) Conflict Free Sourcing Initiative (CFSI), which provides disclosures of upstream suppliers in the supply chain.

Our controls include, but are not limited to, our (a) Code of Business Conduct and Ethics, which is available at <http://investor.harmonicinc.com/phoenix.zhtml?c=90244&p=irol-govHighlights> and outlines expected behaviors for all Harmonic employees, and (b) Supplier Code of Conduct, which is available at <http://www.harmonicinc.com/content/supplier-code-conduct>. These website addresses are included for reference only. The information contained on Harmonic's website is not incorporated by reference into this CMR.

### *2.1.4 Supplier Engagement and Activities*

Although we do not purchase materials and components directly from third party suppliers, as part of our risk management plan to ensure suppliers understand our expectations, we have included in our Supplier Code of Conduct information regarding relevant and applicable environmental compliance obligations and responsible sourcing of Conflict Minerals. Harmonic compliance personnel also send periodic emails and training documents to our suppliers to create awareness and inform them about updates regarding rules and regulations relating to Conflict Minerals.

We do not typically have a direct relationship with 3TG smelters and refiners and do not perform direct audits of these entities within our supply chain. We support audits through our adoption of CFSI initiatives and recommendations.

Feedback from our recent engagements has allowed us to enhance the quality of our training document to clearly define what is expected from suppliers, and we expect improved quality of responses from our suppliers. We will share these resources with our suppliers and also plan to host live webinars for our suppliers to facilitate interaction with Conflict Minerals subject matter experts from the industry.

### *2.1.5 Grievance Mechanism*

We have grievance mechanisms whereby employees and suppliers can report violations of Harmonic's policies either anonymously under our Whistle Blower Policy and Code of Business Conduct and Ethics, or non-anonymously to Harmonic's Human Resources department.

### *2.1.6 Maintenance Record*

We have adopted a policy to retain compliance data and relevant documentation for at least 5 years from the date of last use or issuance, whichever is later.

### *2.1.7 Identify and Assess Risk in the Supply Chain*

Because of our size, the complexity of our products, and the depth, breadth, and constant evolution of our supply chain, it is difficult to identify suppliers that are upstream from our more direct suppliers. Accordingly, we participate in a number of industry-wide initiatives as described in section 3 below.

We rely on our suppliers, whose components contain 3TG, to provide us with information about the source of Conflict Minerals. Our suppliers are similarly reliant upon information provided by their suppliers. Many of our largest suppliers are also SEC registrants and subject to the Rule.

### *2.1.8 Design and Implement a Strategy to Respond to Risks*

In response to this risk assessment, Harmonic has an approved risk management plan, through which the Conflict Minerals program is implemented, managed and monitored. Updates to this risk assessment are provided regularly to senior management.

As part of our risk management plan, to ensure suppliers understand our expectations, we have posted information on our company website regarding relevant and applicable environmental compliance obligations, including responsible sourcing of Conflict Minerals, to Harmonic and its suppliers. The Harmonic Compliance Team also sends periodic emails and training documents to our suppliers to create awareness and inform them about updates to rules and regulations relating to Conflict Minerals.

As described in our Conflict Minerals policy, we require all suppliers in our supply chain to utilize materials that originate from DRC conflict-free smelters certified by EICC. However, if we determine that any supplier is, or a reasonable risk exists that it may be, violating this policy, then we will require the supplier to commit to devise and undertake suitable corrective action to move to a conflict free source

### *2.1.9 Carry out Independent Third Party Audit of Supply Chain Due Diligence at Identified Points in the Supply Chain*

We do not typically have a direct relationship with 3TG smelters and refiners and do not perform direct audits of these entities within our supply chain. We support audits through our participation in the CFSI.

### *2.1.10 Report on supply chain due diligence*

Harmonic's due diligence measures included:

- a. Conducting a supply-chain survey with direct suppliers of materials containing Conflict Minerals using the EICC-GeSI Conflict Minerals Reporting Template to identify the smelters and refiners; and
- b. Comparing the smelters and refiners identified in the supply-chain survey against the list of smelter facilities which have been identified as "conflict free" by programs such as the EICC-GeSI Conflict Free Smelter Program for tantalum, tin, tungsten and gold.

Our suppliers were also provided with instructions and guidance to complete the template.

## **3. YEAR 2013 DUE DILIGENCE EFFORTS**

### *3.1 Due Diligence Implementation*

We conducted an analysis of our products and found that almost all of our products, excluding software products, are Covered Products. Thereafter, we undertook in good faith a reasonable country of origin inquiry (“RCOI”) reasonably designed to determine if any 3TG originated in the Covered Countries and whether any of the 3TG may be from recycled or scrap sources with respect to products: (i) for which 3TG are necessary to the functionality or production of that product; (ii) that were manufactured, or contracted to be manufactured, by Harmonic; and (iii) for which the manufacture was completed during calendar year 2013.

Based on our RCOI, we were unable to determine that the 3TG did not originate in the Covered Countries, or if our 3TG came from recycled or scrap sources.

After performing the RCOI, we implemented a diligence process designed to conform with the OECD Guidance in order to exercise due diligence on the source and chain of custody of the Conflict Minerals.

### *3.2 Supply Chain Due Diligence Process*

We relied on our EMS contractors and their suppliers to provide information on the origin of the 3TG contained in components and materials supplied to us – including sources of 3TG that are supplied to them by their lower tier suppliers.

#### *3.2.1 Efforts to Determine Mine or Location of Origin*

Through our participation in CFSI and OECD implementation programs, and requesting our suppliers to complete the EICC/GeSI Conflict Minerals Reporting template, we have determined that seeking information about 3TG smelters and refiners in our supply chain represents the most reasonable effort we can make to determine the mines or locations of origin of the 3TG in our supply chain. Please visit our FAQ section on our website at <http://harmonicinc.com/content/frequently-asked-questions-faqs>. This website address is included for reference only. The information contained on Harmonic’s website is not incorporated by reference into this CMR.

#### *3.2.2 The Survey*

We used the reporting template prepared by the EICC-GeSI to collect Conflict Minerals and smelter information from our first tier suppliers. We contacted and surveyed all of our first tier suppliers who supplied components and materials to us through our EMS contractors after January 01, 2013. In addition, we included suppliers where the nature of the component, or the location of the supplier, indicated that those components were likely to contain 3TG.

#### *3.2.3 Survey Responses*

Although we sent out the EICC-GeSI survey to 100% of our suppliers that are in scope of our RCOI, however, we only received responses from approximately 60% of our suppliers through our initial survey and follow-up efforts. Responses were reviewed for completeness, reasonableness, and consistency, and we routinely followed up with our contract manufacturers and component suppliers for corrections and clarifications as needed.

Supplier responses included the names of over 2,000 entities identified by our suppliers as smelters or refiners, but did not provide adequate information to enable us to verify that all those entities are smelters or refiners, nor could we confirm that 3TGs from these entities had been included in components supplied to Harmonic.

In the supplier responses, 50 of the smelters and refiners were identified as certified Conflict-Free using the CFSI list. In order to verify the claimed status, we compared the names of those entities and confirmed their inclusion on the CFSI’s current lists of Conflict-Free smelters. In addition, 116 smelters were identified and confirmed as “known” smelters using the smelter list from EICC-GeSI form version 2.03a, but which were not included on the CFSI’s current lists of Conflict-Free smelters. The remaining processing facilities provided by our suppliers were not validated as in fact being smelters or refiners or as being certified Conflict-Free.

Furthermore, only approximately 10% of our suppliers provided us with information at a part number level. However, the rest of our suppliers provided data at a company or divisional level, so we were unable to specify the smelters or

refiners used for components supplied to Harmonic. With the exception of the 10% suppliers described above, we are therefore unable to determine whether any of the Conflict Minerals reported by the suppliers were contained in components or parts supplied to us or to validate that any of these smelters or refiners are actually in our supply chain.

### *3.3 List of Smelters and Refiners*

Based on the survey responses summarized above in Section 3.2.3, we have prepared [Annex 2](#) of this report, which includes the names of smelters and refiners that are identified as certified conflict-free smelters from the CFSI list (dated as of April 30, 2014) and “known” smelters that were identified from the EICC-GeSI smelters list (data collection template version 2.03a), but which were not included on the CFSI’s current list of Conflict-Free smelters.

### *3.4 Report on Supply Chain Due Diligence*

After performing the RCOI and due diligence, because we were unable to comprehensively determine the origin of all Conflict Minerals used in our products, the facilities used to process them, their country of origin, and their mine or location of origin, whether or not they came from recycled or scrap resources, we concluded that our products are “DRC Conflict Undeterminable” with regard to calendar year 2013.

## **4. Risk Mitigation**

In the next compliance period, Harmonic intends to take the steps listed below to improve the information gathered from its due diligence to further mitigate any risk that the Conflict Minerals in our products do not benefit armed groups in the Covered Countries.

- a. Include a Conflict Minerals flow-down clause in new or renewed supplier contracts.
- b. Continue contacting and following up with our suppliers to solicit more responses to our survey.
- c. Direct our suppliers to training resources to increase the response rate to our survey and improve the content of supplier survey responses.
- d. Provide training sessions and/or webinars to educate our suppliers about our Conflict Minerals policy and their role in mitigating risk and creating a transparent supply chain. Following OECD Guidance to strengthen engagement with suppliers, we have prepared training documents and a resource library to educate and create awareness among our suppliers.
- e. Consider terminating any of our suppliers found to be supplying us with 3TG from Covered Countries.
- f. Work with the OECD and relevant trade associations to define and improve best practices and build leverage over the supply chain in accordance with the OECD Guidance.

## **ANNEX 1 - CONFLICT MINERALS POLICY**

Harmonic is committed to ethical sourcing of minerals used in our products and supports the objectives of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”), which aims to prevent the use of conflict minerals that directly or indirectly finance or benefit armed groups in The Democratic Republic of the Congo (DRC) and adjoining countries.

Our direct suppliers and contract manufacturers are required to comply with Harmonic’s Supplier Code of Conduct, which includes requirements relating to conflict minerals and responsible sourcing. We educate our suppliers on these matters and steps they can take to achieve increased transparency regarding the origin of minerals contained in the products they manufacture and sell to Harmonic. We require all suppliers in our supply chain to utilize materials that originate outside of the DRC or otherwise from DRC conflict-free smelters certified by the Electronics Industry Citizenship Coalition (EICC) or to otherwise certify to us as to their conflict-free status. We conduct periodic reviews with our suppliers to ensure that they are in compliance with this policy.

Harmonic, like many companies in the electronics industry, uses components in the manufacture of our products that include some of the minerals covered under the Dodd-Frank Act. However, we do not purchase these minerals directly from smelters or mines; therefore, we must rely on the source information provided by our suppliers in the Electronics Industry Citizenship Coalition–Global e-Sustainability Initiative’s (EICC–GeSI) Conflict Free Sourcing Initiative (CFSI) survey template. We make reasonable efforts in our supply chain to identify country or mine of origin of the subject minerals we use and expect that our suppliers make similar efforts in their supply chains.

Harmonic continues to work closely with its supply chain to trace newly mined minerals back to their origin in order to ensure responsible sourcing.

If you require specific conflict mineral sourcing information for Harmonic products or require more information on our policy, please contact the Harmonic Product Compliance Team at [regulatory.compliance@harmonicinc.com](mailto:regulatory.compliance@harmonicinc.com).

In addition to this conflict minerals policy, we have established a conflict minerals compliance program that is designed to follow the framework established by the Organization for Economic Cooperation and Development (OECD).

For additional information about our commitment to responsible sourcing and other ethical practices, see our Code of Business Conduct and Ethics.

This policy is publicly available on our website at <http://harmonicinc.com/content/conflict-minerals-policy>.

**ANNEX 2 - LIST OF SMELTERS AND REFINERS**

IDENTIFIED CERTIFIED CONFLICT FREE SMELTERS/REFINERS FROM CFSI LIST

<b>Metal</b>	<b>Certified Conflict-Free Smelters</b>	<b>Country of Origin</b>
Gold	Western Australian Mint trading as The Perth Mint	AUSTRALIA
Gold	Royal Canadian Mint	CANADA
Gold	Metalor Technologies (Hong Kong) Ltd	CHINA
Gold	Heimerle + Meule GmbH	GERMANY
Gold	Heraeus Precious Metals GmbH & Co. KG	GERMANY
Gold	Heraeus Ltd. Hong Kong	HONGKONG
Gold	ECO-SYSTEM RECYCLING CO., LTD.	JAPAN
Gold	Ishifuku Metal Industry Co., Ltd.	JAPAN
Gold	JX Nippon Mining & Metals Co., Ltd.	JAPAN
Gold	Matsuda Sangyo Co., Ltd.	JAPAN
Gold	Mitsui Mining and Smelting Co., Ltd.	JAPAN
Gold	Nihon Material Co. LTD	JAPAN
Gold	Sumitomo Metal Mining Co., Ltd.	JAPAN
Gold	Tanaka Kikinzoku Kogyo K.K.	JAPAN
Gold	Tokuriki Honten Co., Ltd	JAPAN
Gold	Rand Refinery (Pty) Ltd	SOUTH AFRICA
Gold	Metalor Technologies SA	SWITZERLAND
Gold	PAMP SA	SWITZERLAND
Gold	Valcambi SA	SWITZERLAND
Gold	Solar Applied Materials Technology Corp.	TAIWAN
Gold	Istanbul Gold Refinery	TURKEY
Gold	Kennecott Utah Copper LLC	USA
Gold	Materion	USA
Gold	Metalor USA Refining Corporation	USA
Gold	United Precious Metal Refining, Inc.	USA
Tantalum	Plansee	AUSTRIA
Tantalum	Jiujiang Jinxin Nonferrous Metals Co., Ltd.	CHINA
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA
Tantalum	Zhuzhou Cement Carbide	CHINA
Tantalum	Mitsui Mining & Smelting	JAPAN
Tantalum	Taki Chemicals	JAPAN
Tantalum	Ulba	KAZAKHSTAN
Tantalum	Solikamsk Metal Works	RUSSIA
Tantalum	Tantalite Resources	SOUTH AFRICA
Tantalum	Exotech Inc.	USA
Tantalum	Global Advanced Metals	USA
Tantalum	Hi-Temp	USA
Tantalum	Kemet Blue Powder	USA

<b>Metal</b>	<b>Certified Conflict-Free Smelters</b>	<b>Country of Origin</b>
Tantalum	QuantumClean	USA
Tantalum	Telex	USA
Tin	OMSA	BOLIVIA
Tin	Mineração Taboca S.A.	BRAZIL
Tin	Gejiu Non-Ferrous Metal Processing Co. Ltd.	CHINA
Tin	Alpha	INDONESIA
Tin	PT Bukit Timah	INDONESIA
Tin	PT Tambang Timah	INDONESIA
Tin	Mitsubishi Materials Corporation	JAPAN
Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA
Tungsten	Ganzhou Grand Sea W & Mo Group Co., Ltd.	CHINA
Tungsten	Xiamen Tungsten Co., Ltd.	China

IDENTIFIED SMELTERS/REFINERS FROM EICC-GeSI LIST THAT ARE NOT CERTIFIED AS CONFLICT FREE FROM CFSI LIST

<b>Metal</b>	<b>Known Smelters/Refiners from EICC-GeSI List (not conflict-free)</b>	<b>Country of Origin</b>
Gold	Johnson Matthey Limited	CANADA
Gold	Xstrata Canada Corporation	CANADA
Gold	Codelco	CHILE
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Company Limited	CHINA
Gold	Jiangxi Copper Company Limited	CHINA
Gold	Suzhou Xingrui Noble	CHINA
Gold	The Great Wall Gold and Silver Refinery of China	CHINA
Gold	The Refinery of Shandong Gold Mining Co. Ltd	CHINA
Gold	Zijin Mining Group Co. Ltd	CHINA
Gold	Aurubis AG	GERMANY
Gold	Heraeus Ltd Hong Kong	HONGKONG
Gold	PT Aneka Tambang (Persero) Tbk	INDONESIA
Gold	Chimet SpA	ITALY
Gold	Japan Mint	JAPAN
Gold	Kojima Chemicals Co. Ltd	JAPAN
Gold	Pan Pacific Copper Co. LTD	JAPAN
Gold	Sumitomo Metal Mining Co. Ltd.	JAPAN
Gold	Tokuriki Honten Co. Ltd	JAPAN
Gold	Yokohama Metal Co Ltd	JAPAN
Gold	Kazzinc Ltd	KAZAKHSTAN
Gold	Central Bank of the DPR of Korea	KOREA
Gold	DaeryongENC	KOREA
Gold	Do Sung Corporation	KOREA
Gold	Hwasung CJ Co. Ltd	KOREA

<b>Metal</b>	<b>Known Smelters/Refiners from EICC-GeSI List (not conflict-free)</b>	<b>Country of Origin</b>
Gold	Korea Metal Co. Ltd	KOREA
Gold	LS-Nikko Copper Inc	KOREA
Gold	SAMWON METALS Corp.	KOREA
Gold	Torecom	KOREA
Gold	Kyrgyzaltyn JSC	KYRGYZSTAN
Gold	Caridad	MEXICO
Gold	Met-Mex Peñoles, S.A.	MEXICO
Gold	Schone Edelmetaal	NETHERLANDS
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES
Gold	FSE Novosibirsk Refinery	RUSSIA
Gold	JSC Ekaterinburg Non-Ferrous Metal Processing Plant	RUSSIA
Gold	JSC Uralectromed	RUSSIA
Gold	Moscow Special Alloys Processing Plant	RUSSIA
Gold	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastvetmet)	RUSSIA
Gold	OJSC Kolyma Refinery	RUSSIA
Gold	Prioksky Plant of Non-Ferrous Metals	RUSSIA
Gold	SOE Shyolkovsky Factory of Secondary Precious Metals	RUSSIA
Gold	SEMPSA Joyeria Plateria SA	SPAIN
Gold	PX Précinox SA	SWITZERLAND
Gold	Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	TURKEY
Gold	Nadir Metal Rafineri San. Ve Tic. A.?.	TURKEY
Gold	L'azurde Company For Jewelry	UAE
Gold	Ohio Precious Metals LLC.	USA
Gold	Sabin Metal Corp.	USA
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN
Gold	Navoi Mining and Metallurgical Combinat	UZBEKISTAN
Tantalum	LMS Brasil S.A.	BRAZIL
Tantalum	JiuJiang Tambre Co. Ltd.	CHINA
Tantalum	King-Tan Tantalum Industry Ltd	CHINA
Tantalum	RFH	CHINA
Tantalum	Molycorp Silmet	ESTONIA
Tantalum	H.C. Starck GmbH	GERMANY
Tantalum	Gannon & Scott	USA
Tin	Metallo Chimique	BELGIUM
Tin	EM Vinto	BOLIVIA
Tin	Cooper Santa	BRAZIL
Tin	White Solder Metalurgia	BRAZIL
Tin	CNMC (Guangxi) PGMA Co. Ltd.	CHINA
Tin	Gold Bell Group	CHINA
Tin	Huichang Jinshunda Tin Co. Ltd	CHINA
Tin	Jiangxi Nanshan	CHINA

<b>Metal</b>	<b>Known Smelters/Refiners from EICC-GeSI List (not conflict-free)</b>	<b>Country of Origin</b>
Tin	Kai Unita Trade Limited Liability Company	CHINA
Tin	Linwu Xianggui Smelter Co	CHINA
Tin	Yunnan Tin Company Limited	CHINA
Tin	CV Duta Putra Bangka	INDONESIA
Tin	CV Gita Pesona	INDONESIA
Tin	CV JusTindo	INDONESIA
Tin	CV Makmur Jaya	INDONESIA
Tin	CV Nurjanah	INDONESIA
Tin	CV Prima Timah Utama	INDONESIA
Tin	CV Serumpun Sebalai	INDONESIA
Tin	CV United Smelting	INDONESIA
Tin	PT Alam Lestari Kencana	INDONESIA
Tin	PT Artha Cipta Langgeng	INDONESIA
Tin	PT Babel Inti Perkasa	INDONESIA
Tin	PT Babel Surya Alam Lestari	INDONESIA
Tin	PT Bangka Kudai Tin	INDONESIA
Tin	PT Bangka Putra Karya	INDONESIA
Tin	PT Bangka Timah Utama Sejahtera	INDONESIA
Tin	PT Bangka Tin Industry	INDONESIA
Tin	PT Belitung Industri Sejahtera	INDONESIA
Tin	PT DS Jaya Abadi	INDONESIA
Tin	PT Eunindo Usaha Mandiri	INDONESIA
Tin	PT Fang Di MulTindo	INDONESIA
Tin	PT HP Metals Indonesia	INDONESIA
Tin	PT Karimun Mining	INDONESIA
Tin	PT Koba Tin	INDONESIA
Tin	PT Mitra Stania Prima	INDONESIA
Tin	PT Panca Mega	INDONESIA
Tin	PT Refined Banka Tin	INDONESIA
Tin	PT Sariwiguna Binasentosa	INDONESIA
Tin	PT Seirama Tin investment	INDONESIA
Tin	PT Sumber Jaya Indah	INDONESIA
Tin	PT Timah Nusantara	INDONESIA
Tin	PT Tinindo Inter Nusa	INDONESIA
Tin	PT Tommy Utama	INDONESIA
Tin	PT Yinchendo Mining Industry	INDONESIA
Tin	Fenix Metals	POLAND
Tungsten	Wolfram Bergbau und Hütten AG	AUSTRIA
Tungsten	Chongyi Zhangyuan Tungsten Co Ltd	CHINA
Tungsten	Ganzhou Grand Sea W & Mo Group Co Ltd	CHINA
Tungsten	Hunan Chenzhou Mining Group Co	CHINA
Tungsten	Hunan Chun-Chang Nonferrous Smelting & Concentrating Co., Ltd.	CHINA

<b>Metal</b>	<b>Known Smelters/Refiners from EICC-GeSI List (not conflict-free)</b>	<b>Country of Origin</b>
Tungsten	Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.	CHINA
Tungsten	Jiangxi Rare Earth & Rare Metals Tungsten Group Corp	CHINA
Tungsten	Jiangxi Tungsten Industry Group Co Ltd	CHINA
Tungsten	Xiamen Tungsten Co Ltd	CHINA
Tungsten	Xinhai Rendan Shaoguan Tungsten Co., Ltd.	CHINA
Tungsten	Japan New Metals Co Ltd	JAPAN
Tungsten	Wolfram Company CJSC	RUSSIA
Tungsten	Global Tungsten & Powders Corp	USA
Tungsten	Kennametal Inc.	USA