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

FORM SD
Specialized Disclosure Report

Analogic Corporation
(Exact name of registrant as specified in its charter)

Massachusetts
(State or other jurisdiction
of incorporation or organization)

0-6715
(Commission
File Number)

04-2454372
(IRS Employer
Identification) No.

8 Centennial Drive, Peabody, Massachusetts
(Address of principal executive offices)

01960
(Zip code)

John J. Fry (978) 326-4000
(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, 2017.
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Section 1 – Conflict Minerals Disclosure**Item 1.01 Conflict Minerals Disclosures and Report**

In accordance with Rule 13p-1 under the Securities and Exchange Act of 1934 (“Rule 13p-1”), Analogic Corporation (“Analogic”) has filed this Specialized Disclosure Report (“Form SD”) and the associated Conflict Minerals Report and both reports are posted on the Company’s website (www.analogic.com/compliance). Analogic has included its Conflict Minerals Report as Exhibit 1.01 to this Form SD.

Item 1.02 Exhibit

ANALOGIC has included its Conflict Minerals Report as Exhibit 1.01 to this Form SD.

Section 2 – Exhibits**Item 2.01 Exhibits**

Exhibit 1.01 – Conflict Minerals Report as required by Items 1.01 and 1.02 of 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 duly authorized undersigned.

Analogic Corporation

By: /s/ John J. Fry
Name: John J. Fry
Title: Senior Vice President, General Counsel and Secretary

Date: May 31, 2018

ANALOGIC CORPORATION
CONFLICT MINERALS REPORT
FOR THE REPORTING PERIOD FROM
JANUARY 1 TO DECEMBER 31, 2017

Introduction

This Conflict Minerals Report of Analogic Corporation (herein referred to as “we”, “us”, “Analogic”, or the “Company”) is filed pursuant to Rule 13p-1 (the “Rule”) promulgated under the Securities Exchange Act of 1934 for the reporting period from January 1, 2017 to December 31, 2017.

The term “conflict minerals” is defined in Section 13(p) of the Rule as (A) cassiterite, columbite-tantalite (coltan), gold, wolframite, and their derivatives, as limited by the Rule, tin, tantalum, tungsten, and gold (“3TG”); or (B) any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of Congo (“DRC”) or any adjoining country that shares an internationally recognized border with the DRC. The Rule requires disclosure of certain information when a company manufactures or contracts to manufacture products for which tin, tantalum, tungsten or gold are necessary to the functionality or the production of the company’s products. For the purposes of this report, tin, tantalum, tungsten and gold will collectively be referred to herein as the 3TGs.

Company Overview

Analogic Corporation designs, manufactures, and commercializes innovative real-time guidance, diagnostic imaging and threat detection technologies to advance the practice of medicine and save lives. We operate and report along three business segments: Medical Imaging, Ultrasound and Security and Detection. Our Medical Imaging segment provides critical enabling medical imaging systems and subsystems for computed tomography, or CT, magnetic resonance imaging, or MRI and high-resolution digital mammography. We sell our Medical Imaging products primarily through longstanding relationships with well-known multinational medical original equipment manufacturers, or OEMs, and new entrants in emerging markets. Our Ultrasound business provides real-time ultrasound procedure guidance systems for the urology, surgery and point of care markets. We sell our ultrasound products, under the BK Ultrasound brand, through our direct sales force in North America and Europe, as well as through a network of distributors to clinical practitioners throughout the world. Our Security and Detection segment designs and manufactures automated threat detection systems for aviation baggage inspection applications utilizing advanced medical CT technology and systems used for DNA analysis for law enforcement and government agencies. We sell our aviation threat detection and DNA systems through multinational partners. We were incorporated in the Commonwealth of Massachusetts in November 1967 and are headquartered in Peabody, Massachusetts.

Products Covered by this Report

This report relates to products (i) for which conflict minerals are necessary to the functionality or production of that product; (ii) that were manufactured, or contracted to be manufactured, by the Company; and (iii) for which manufacture was completed during calendar year 2017.

We evaluated our product lines to identify the Covered Products. We also evaluated our purchased material categories to identify those purchased items that contain, or are reasonably likely to contain, conflict minerals.

These products (which we refer to as the “Covered Products”) consist of products in the areas of medical imaging, medical ultrasound, security technology, and motion control. Our medical imaging products comprise systems and subsystems used in computed tomography (“CT”), magnetic resonance imaging (“MRI”), and digital mammography. Our ultrasound products comprise medical ultrasound systems and probes. Our security technology products comprise threat detection systems for use in aviation security. Our motion control products comprise drives and controllers deployed in semiconductor, life sciences, automotive assembly, and other industries.

Conflict Minerals Program & Policy

We have actively engaged with our customers and suppliers for several years with respect to the use of conflict minerals. We adopted a Conflict Minerals Policy articulating our conflict minerals supply chain due diligence process and our commitment to our reporting obligations regarding conflict minerals. Our policy is available on our website www.analogic.com/compliance.

Our Reasonable Country of Origin Inquiry

We conducted a reasonable country of origin inquiry (“RCOI”) regarding the 3TGs in our products to determine whether any of the 3TGs necessary to our products originated in the Democratic Republic of the Congo, the Republic of the Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola (which we refer to herein as the “Covered Countries”) and whether any of the 3TGs were from recycled or scrap sources.

As part of our RCOI, we surveyed our principal suppliers of 3TGs in Covered Products using the Responsible Business Alliance (RBA) GESI Conflict Minerals reporting template (“CMRT”). This year we partnered with a third-party service provider, Assent Compliance (“Assent”) to assist us in reviewing our supply chain. We provided a list of suppliers associated with the Covered Products for Assent to upload into the Assent Compliance Manager Tool (the “ACM”). We contacted suppliers through the ACM, a SaaS platform provided by Assent that allows us to complete and track supplier communications as well as allows suppliers to upload their completed CMRTs directly into the tool for review. Assent engaged in follow up communications with those suppliers who did not respond to the survey or who provided information that was incomplete as determined by Assent’s automated data validation. We then reviewed the survey responses to identify the facilities used to process, and the countries of origin of, the Covered Products. At the end of this process, the Company had received a response rate of reasonably acceptable and complete surveys from over 81% of its suppliers surveyed, compared to over 79% of suppliers surveyed the prior year.

The CMRT eliminated irrelevant suppliers, i.e., suppliers that do not provide us with any products that contain 3TGs. Specifically, question 1 of the CMRT asks suppliers whether any of the 3TGs they use are necessary to the functionality or production of their products. We also periodically reviewed the supplier list to ensure that irrelevant suppliers were removed from the survey process. We conducted this analysis to screen out irrelevant suppliers based on the following criteria:

- The company supplies packaging only (excluding labels)
- The company supplies us with items that do not end up in our products (including equipment used to make our products)
- The company is a test lab
- The company is a service provider only

We believe the inquiry was reasonably designed to determine whether any of the 3TGs in the Covered Products originated in a Covered Country. Annex A lists the smelters and refiners identified by our suppliers and Annex B lists the countries of origin identified by our suppliers.

Due Diligence Process

We conducted due diligence on the source and chain of custody of the 3TGs in our products, and are reporting on the results of that due diligence in this Conflict Minerals Report.

Design of Due Diligence

Our due diligence measures were designed to conform to the Organisation 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 (2013), including the related supplements on gold, tungsten, and tantalum (which we refer to as the OECD guidance), in all material respects.

Our Conflict Minerals program followed the following five-step framework described in the OECD guidance, including, as applicable, with regard to our due diligence process:

- *Step 1 – Establish strong management systems;*
- *Step 2 – Assess risk in the supply chain;*
- *Step 3 – Design and implement a strategy to respond to identified risk;*
- *Step 4 – Carry out independent third-party audit of supply chain; and*
- *Step 5 – Report on supply chain due diligence.*

The OECD Guidance specifies that the requirements for compliance should reflect a company's position in the supply chain. In particular, the OECD Guidance states that the implementation of due diligence should be tailored to a company's activities and relationships and that the nature and extent of due diligence may vary based on a company's size, products, relationships with suppliers and other factors. Due to practical difficulties associated with supply chain complexities, the OECD Guidance advises that downstream companies exercise due diligence primarily by establishing controls over their immediate suppliers. Accordingly, we rely primarily on our "tier 1" (direct) suppliers to provide information with respect to the origin of the conflict minerals contained in the components and materials supplied to us.

Due Diligence Performed

Step 1 – Establish strong management systems

Internal Team

In connection with our due diligence efforts, we established a management team that includes subject matter experts from relevant functions including operations, regulatory, finance and legal that is responsible for implementing our conflict minerals compliance strategy. Senior management was briefed on the results of our due diligence efforts on a regular basis.

As mentioned above, we also use Assent to assist us with evaluating supply chain information regarding 3TGs and in the development and implementation of the due diligence steps that we take with suppliers.

Control Systems

We also established a corporate policy emphasizing our commitment to compliance with the Rule, including our intention to conduct a reasonable country of origin inquiry and due diligence as required by the Rule. This corporate policy is available at our website, www.analogic.com/compliance.

Supplier Engagement

Analogic strongly encourages our suppliers to implement responsible sourcing and to have them encourage smelters and refiners to obtain a 'conflict-free' designation from an independent, third-party auditor.

Grievance Mechanisms

We also maintain a mechanism through which concerns and questions about our conflict minerals policy and use (and other compliance concerns) may be raised. Such questions and concerns may be directed to +1 770-810-1147.

Maintain Records

Assent retains all conflict minerals related materials received by its suppliers. In addition, all CMRTs collected from our suppliers are maintained in Assent's database.

Step 2 – Assess risk in the supply chain

We do not purchase 3TGs directly from mines, smelters or refiners. We must therefore rely on our suppliers to provide information regarding the origin of 3TGs that are included in the Covered Products. We surveyed our principal suppliers of materials that include conflict minerals using the Responsible Business Alliance (RBA) GESI Conflict Minerals reporting template. Risks are identified automatically in the ACM based on criteria established for supplier responses in the CMRT form. The primary risk we identified for the 2017 reporting year was due to the fact that most of the responses received were provided at a company or divisional level. In some cases, our suppliers were unable to specify the smelters or refiners used for the 3TGs that they supply to us.

We do not typically have a direct relationship with 3TG smelters and refiners and do not perform or direct audits of these entities within our supply chain. Assent compared these facilities listed in the responses to the list of smelters and refiners maintained by the Conflict-Free Sourcing Initiative ("RMI") and, if a supplier indicated that the facility was certified as "Conflict-Free," confirmed that the name was listed by RMI. Due to the provision of primarily supplier-level CMRTs, we cannot definitively determine their connection to the Covered Products

Each facility that meets the RMI definition of a smelter or refiner of a 3TG mineral is assigned a risk of high, medium or low based on 3 scoring criteria:

1. Geographic proximity to the DRC and covered countries;
2. Conflict-Free Smelter Program (RMAP) audit status;
3. Known or plausible evidence of unethical or conflict sourcing.

When any facilities that have been deemed to be high-risk based on the above noted criteria appear on a CMRT submitted by one of our suppliers, Assent immediately instructs the supplier to take risk mitigation actions, including submission of a product-level CMRT to better identify if there is a connection between the products they supply to us and the high-risk smelters or refiners. In addition, suppliers are guided to Assent University, a learning management system, where they have access to educational materials on mitigating the risk of smelters or refiners in the supply chain.

Additionally, suppliers are evaluated on program strength (further assisting in identifying risk in the supply chain). Evaluating and tracking the strength of the program meets the OECD Due Diligence Guidelines and can assist in making key risk mitigation decisions as the program progresses. The criteria used to evaluate the strength of the program are:

- A. Have you established a conflict minerals sourcing policy?
- E. Have you implemented due diligence measures for conflict-free sourcing?
- G. Do you review due diligence information received from your suppliers?
- H. Does your review process include corrective action management against your company's expectations?

When suppliers meet or exceed those criteria (Yes to at least A, E, G, H), they are deemed to have a strong program. When suppliers do not meet those criteria, they are deemed to have a weak program.

Step 3 – Design and implement a strategy to respond to identified risk

The design of our due diligence process conforms to Step 3 of the OECD guidance as applicable to our circumstances and position in the supply chain as a "downstream" company with little to no direct influence on smelters/refiners. To the extent that we can influence our direct suppliers to provide minerals from conflict-free smelters or refiners, we seek to do so.

Step 4 – Carry out independent third-party audit of supply chain

We do not have direct relationships with smelters or refiners and, accordingly, we do not perform direct audits of these entities in our supply chain. Rather, we rely on the efforts of industry associations that administer independent third-party smelter and refiner audit programs. In this regard, we relied on the RMAP listing of conflict-free compliant sources.

Step 5 - Report on supply chain due diligence

We have prepared and filed a Form SD and this Conflict Minerals Report, and posted the required content on our website at www.analogic.com/compliance.

Due Diligence Results

After conducting the due diligence described above, we have been unable to determine whether our necessary conflict minerals finance or otherwise benefit armed groups in the covered countries, as defined in the Rule.

Our efforts to determine the mine or location of origin of the necessary conflict minerals consisted of the due diligence measures described above in this report. Based on the information provided by our suppliers, we determined that some, but not all, of the smelters that processed the necessary conflict minerals were included in the RMI RMAP listing of conflict-free compliant sources.

We surveyed all of our principal suppliers of the Covered Products and received responses from over 81% of suppliers surveyed. All final CMRT submissions were reviewed and validated to ensure that no inaccuracies or gaps were found. All suppliers were able to correct their CMRT and as such we have received no invalid submissions. We identified approximately 312 legitimate smelters or refiners (after elimination of duplicates) processing conflict minerals, of which approximately 253 have been designated conflict-free by the RMI. Annex A lists these legitimate smelters and refiners. In addition, Annex B lists the countries of origin identified by our suppliers. Some suppliers did not respond to our survey request, and some returned incomplete responses. In addition, some of those suppliers that responded to our survey returned company-level rather than product-level information. Some of our suppliers indicated that the smelters used to process, or the country of origin of, the conflict minerals contained in products supplied by them are currently undetermined pending the receipt of additional information from their suppliers. Therefore, we are unable to identify with certainty all of the smelters used to process, or all of the countries of origin of, the necessary conflict minerals.

Efforts to Mitigate Risk

The Company has taken, or expects to take in reporting year 2017, the following steps, to mitigate the risk that the necessary conflict minerals contained in the Company's products finance or benefit armed groups in the covered countries:

- 1) Continuing to engage with our suppliers to obtain current, accurate and complete information about the supply chain relevant to 3TGs.
- 2) Strongly encouraging our direct suppliers to implement responsible sourcing and to have them encourage smelters and refiners to obtain a "conflict-free" designation from an independent, third-party auditor; and
- 3) Engaging in industry initiatives encouraging "conflict-free" supply chains.

This Conflict Minerals Report contains forward-looking statements relating to actions that we may take in the future. The forward-looking statements included in this report release represent Analogic management's views and expectations as of the date of this report. Analogic anticipates that subsequent events and developments may cause its views and expectations to change. Although Analogic may elect to update these forward-looking statements at some point in the future, it specifically disclaims any obligation to do so. These forward-looking statements should not be relied upon as representing Analogic's views and expectations as of any date subsequent to the date of this report.

Annex A

| Metal | Standard Smelter Name | Smelter Facility Location | Smelter ID | Conflict Free? |
|--------------|---|----------------------------------|-------------------|-----------------------|
| Gold | Abington Reldan Metals, LLC | UNITED STATES | CID002708 | Unknown |
| Gold | Advanced Chemical Company | UNITED STATES | CID000015 | Yes |
| Gold | Aida Chemical Industries Co., Ltd. | JAPAN | CID000019 | Yes |
| Gold | Al Etihad Gold LLC | UNITED ARAB EMIRATES | CID002560 | Yes |
| Gold | Allgemeine Gold-und Silberscheideanstalt A.G. | GERMANY | CID000035 | Yes |
| Gold | Almalyk Mining and Metallurgical Complex (AMMC) | UZBEKISTAN | CID000041 | Yes |
| Gold | AngloGold Ashanti Córrego do Sítio Mineração | BRAZIL | CID000058 | Yes |
| Gold | Argor-Heraeus S.A. | SWITZERLAND | CID000077 | Yes |
| Gold | Asahi Pretec Corp. | JAPAN | CID000082 | Yes |
| Gold | Asahi Refining Canada Ltd. | CANADA | CID000924 | Yes |
| Gold | Asahi Refining USA Inc. | UNITED STATES | CID000920 | Yes |
| Gold | Asaka Riken Co., Ltd. | JAPAN | CID000090 | Yes |
| Gold | Atasay Kuyumculuk Sanayi Ve Ticaret A.S. | TURKEY | CID000103 | Unknown |
| Gold | AU Traders and Refiners | SOUTH AFRICA | CID002850 | Yes |
| Gold | Aurubis AG | GERMANY | CID000113 | Yes |
| Gold | Bangalore Refinery | INDIA | CID002863 | Unknown |
| Gold | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | PHILIPPINES | CID000128 | Yes |
| Gold | Boliden AB | SWEDEN | CID000157 | Yes |
| Gold | C. Hafner GmbH + Co. KG | GERMANY | CID000176 | Yes |
| Gold | Caridad | MEXICO | CID000180 | Unknown |
| Gold | CCR Refinery—Glencore Canada Corporation | CANADA | CID000185 | Yes |
| Gold | Cendres + Métaux S.A. | SWITZERLAND | CID000189 | Yes |
| Gold | Chimet S.p.A. | ITALY | CID000233 | Yes |
| Gold | Chugai Mining | JAPAN | CID000264 | Unknown |
| Gold | Daejin Indus Co., Ltd. | KOREA, REPUBLIC OF | CID000328 | Yes |
| Gold | Daye Non-Ferrous Metals Mining Ltd. | CHINA | CID000343 | Unknown |
| Gold | Degussa Sonne / Mond Goldhandel GmbH | GERMANY | CID002867 | Unknown |
| Gold | DODUCO Contacts and Refining GmbH | GERMANY | CID000362 | Yes |
| Gold | Dowa | JAPAN | CID000401 | Yes |
| Gold | DSC (Do Sung Corporation) | KOREA, REPUBLIC OF | CID000359 | Yes |

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|------|---|-------------------------|-----------|---------|
| Gold | Eco-System Recycling Co., Ltd. | JAPAN | CID000425 | Yes |
| Gold | Elemetal Refining, LLC | UNITED STATES | CID001322 | Unknown |
| Gold | Emirates Gold DMCC | UNITED ARAB EMIRATES | CID002561 | Yes |
| Gold | Fidelity Printers and Refiners Ltd. | ZIMBABWE | CID002515 | Unknown |
| Gold | GCC Gujrat Gold Centre Pvt. Ltd. | INDIA | CID002852 | Unknown |
| Gold | Geib Refining Corporation | UNITED STATES | CID002459 | Yes |
| Gold | Gold Refinery of Zijin Mining Group Co., Ltd. | CHINA | CID002243 | Yes |
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM | CHINA | CID001909 | Unknown |
| Gold | Guangdong Jinding Gold Limited | CHINA | CID002312 | Unknown |
| Gold | Guoda Safina High-Tech Environmental Refinery Co., Ltd. | CHINA | CID000651 | Unknown |
| Gold | Hangzhou Fuchunjiang Smelting Co., Ltd. | CHINA | CID000671 | Unknown |
| Gold | HeeSung | KOREA, REPUBLIC OF | CID000689 | Yes |
| Gold | Heimerle + Meule GmbH | GERMANY | CID000694 | Yes |
| Gold | Heraeus Metals Hong Kong Ltd. | CHINA | CID000707 | Yes |
| Gold | Heraeus Precious Metals GmbH & Co. KG | GERMANY | CID000711 | Yes |
| Gold | Hunan Chenzhou Mining Co., Ltd. | CHINA | CID000767 | Unknown |
| Gold | Hwasung CJ Co., Ltd. | KOREA, REPUBLIC OF | CID000778 | Unknown |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | CHINA | CID000801 | Yes |
| Gold | Ishifuku Metal Industry Co., Ltd. | JAPAN | CID000807 | Yes |
| Gold | Istanbul Gold Refinery | TURKEY | CID000814 | Yes |
| Gold | Italpreziosi | ITALY | CID002765 | Yes |
| Gold | Japan Mint | JAPAN | CID000823 | Yes |
| Gold | Jiangxi Copper Co., Ltd. | CHINA | CID000855 | Yes |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant | RUSSIAN FEDERATION | CID000927 | Yes |
| Gold | JSC Uralelectromed | RUSSIAN FEDERATION | CID000929 | Yes |
| Gold | JX Nippon Mining & Metals Co., Ltd. | JAPAN | CID000937 | Yes |
| Gold | Kaloti Precious Metals | UNITED ARAB EMIRATES | CID002563 | Unknown |
| Gold | Kazakhmys Smelting LLC | KAZAKHSTAN | CID000956 | Unknown |
| Gold | Kazzinc | KAZAKHSTAN | CID000957 | Yes |
| Gold | Kennecott Utah Copper LLC | UNITED STATES | CID000969 | Yes |
| Gold | KGHM Polska Miedz Spolka Akcyjna | POLAND | CID002511 | Unknown |
| Gold | Kojima Chemicals Co., Ltd. | JAPAN | CID000981 | Yes |
| Gold | Korea Zinc Co., Ltd. | KOREA, REPUBLIC OF | CID002605 | Yes |
| Gold | Kyrgyzaltyn JSC | KYRGYZSTAN | CID001029 | Yes |

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|------|---|-----------------------|-----------|---------|
| Gold | Kyshtym Copper-Electrolytic Plant ZAO | RUSSIAN FEDERATION | CID002865 | Unknown |
| Gold | L'azurde Company For Jewelry | SAUDI ARABIA | CID001032 | Unknown |
| Gold | Lingbao Gold Co., Ltd. | CHINA | CID001056 | Unknown |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd. | CHINA | CID001058 | Unknown |
| Gold | L'Orfèbre S.A. | ANDORRA | CID002762 | Unknown |
| Gold | LS-NIKKO Copper Inc. | KOREA, REPUBLIC OF | CID001078 | Yes |
| Gold | Luoyang Zijin Yinhui Gold Refinery Co., Ltd. | CHINA | CID001093 | Unknown |
| Gold | Marsam Metals | BRAZIL | CID002606 | Yes |
| Gold | Materion | UNITED STATES | CID001113 | Yes |
| Gold | Matsuda Sangyo Co., Ltd. | JAPAN | CID001119 | Yes |
| Gold | Metalor Technologies (Hong Kong) Ltd. | CHINA | CID001149 | Yes |
| Gold | Metalor Technologies (Singapore) Pte., Ltd. | SINGAPORE | CID001152 | Yes |
| Gold | Metalor Technologies (Suzhou) Ltd. | CHINA | CID001147 | Yes |
| Gold | Metalor Technologies S.A. | SWITZERLAND | CID001153 | Yes |
| Gold | Metalor USA Refining Corporation | UNITED STATES | CID001157 | Yes |
| Gold | Metalúrgica Met-Mex Peñoles S.A. De C.V. | MEXICO | CID001161 | Yes |
| Gold | Mitsubishi Materials Corporation | JAPAN | CID001188 | Yes |
| Gold | Mitsui Mining and Smelting Co., Ltd. | JAPAN | CID001193 | Yes |
| Gold | MMTC-PAMP India Pvt., Ltd. | INDIA | CID002509 | Yes |
| Gold | Modeltech Sdn Bhd | MALAYSIA | CID002857 | Unknown |
| Gold | Morris and Watson | NEW ZEALAND | CID002282 | Unknown |
| Gold | Morris and Watson Gold Coast | AUSTRALIA | CID002866 | Unknown |
| Gold | Moscow Special Alloys Processing Plant | RUSSIAN FEDERATION | CID001204 | Yes |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.Ş. | TURKEY | CID001220 | Yes |
| Gold | Navoi Mining and Metallurgical Combinat | UZBEKISTAN | CID001236 | Unknown |
| Gold | Nihon Material Co., Ltd. | JAPAN | CID001259 | Yes |
| Gold | Ögussa Österreichische Gold- und Silber-Scheideanstalt GmbH | AUSTRIA | CID002779 | Yes |
| Gold | Ohura Precious Metal Industry Co., Ltd. | JAPAN | CID001325 | Yes |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | RUSSIAN FEDERATION | CID001326 | Yes |
| Gold | OJSC Novosibirsk Refinery | RUSSIAN FEDERATION | CID000493 | Yes |
| Gold | PAMP S.A. | SWITZERLAND | CID001352 | Yes |
| Gold | Pease & Curren | UNITED STATES | CID002872 | Unknown |
| Gold | Penglai Penggang Gold Industry Co., Ltd. | CHINA | CID001362 | Unknown |

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|------|--|-----------------------|-----------|---------|
| Gold | Prioksky Plant of Non-Ferrous Metals | RUSSIAN FEDERATION | CID001386 | Yes |
| Gold | PT Aneka Tambang (Persero) Tbk | INDONESIA | CID001397 | Yes |
| Gold | PX Précinox S.A. | SWITZERLAND | CID001498 | Yes |
| Gold | Rand Refinery (Pty) Ltd. | SOUTH AFRICA | CID001512 | Yes |
| Gold | Refinery of Seemine Gold Co., Ltd. | CHINA | CID000522 | Unknown |
| Gold | Remondis Argentia B.V. | NETHERLANDS | CID002582 | Unknown |
| Gold | Republic Metals Corporation | UNITED STATES | CID002510 | Yes |
| Gold | Royal Canadian Mint | CANADA | CID001534 | Yes |
| Gold | SAAMP | FRANCE | CID002761 | Yes |
| Gold | Sabin Metal Corp. | UNITED STATES | CID001546 | Unknown |
| Gold | Safimet S.p.A | Italy | CID002973 | Yes |
| Gold | SAFINA A.S. | CZECH REPUBLIC | CID002290 | Unknown |
| Gold | Sai Refinery | INDIA | CID002853 | Unknown |
| Gold | Samduck Precious Metals | KOREA, REPUBLIC OF | CID001555 | Yes |
| Gold | SAMWON Metals Corp. | KOREA, REPUBLIC OF | CID001562 | Unknown |
| Gold | SAXONIA Edelmetalle GmbH | GERMANY | CID002777 | Yes |
| Gold | Schone Edelmetaal B.V. | NETHERLANDS | CID001573 | Yes |
| Gold | SEMPSA Joyería Plateria S.A. | SPAIN | CID001585 | Yes |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | CHINA | CID001619 | Unknown |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd. | CHINA | CID001622 | Yes |
| Gold | Sichuan Tianze Precious Metals Co., Ltd. | CHINA | CID001736 | Yes |
| Gold | Singway Technology Co., Ltd. | TAIWAN | CID002516 | Yes |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals | RUSSIAN FEDERATION | CID001756 | Yes |
| Gold | Solar Applied Materials Technology Corp. | TAIWAN | CID001761 | Yes |
| Gold | State Research Institute Center for Physical Sciences and Technology | LITHUANIA | CID003153 | Unknown |
| Gold | Sudan Gold Refinery | SUDAN | CID002567 | Unknown |
| Gold | Sumitomo Metal Mining Co., Ltd. | JAPAN | CID001798 | Yes |
| Gold | SungEel HiTech | KOREA, REPUBLIC OF | CID002918 | Yes |
| Gold | T.C.A S.p.A | ITALY | CID002580 | Yes |
| Gold | Tanaka Kikinzoku Kogyo K.K. | JAPAN | CID001875 | Yes |
| Gold | The Refinery of Shandong Gold Mining Co., Ltd. | CHINA | CID001916 | Yes |
| Gold | Tokuriki Honten Co., Ltd. | JAPAN | CID001938 | Yes |
| Gold | Tongling Nonferrous Metals Group Co., Ltd. | CHINA | CID001947 | Unknown |

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|----------|---|--------------------|-----------|---------|
| Gold | Tony Goetz NV | BELGIUM | CID002587 | Unknown |
| Gold | TOO Tau-Ken-Altyn | KAZAKHSTAN | CID002615 | Unknown |
| Gold | Torecom | KOREA, REPUBLIC OF | CID001955 | Yes |
| Gold | Umicore Brasil Ltda. | BRAZIL | CID001977 | Yes |
| Gold | Umicore Precious Metals Thailand | THAILAND | CID002314 | Yes |
| Gold | Umicore S.A. Business Unit Precious Metals Refining | BELGIUM | CID001980 | Yes |
| Gold | United Precious Metal Refining, Inc. | UNITED STATES | CID001993 | Yes |
| Gold | Universal Precious Metals Refining Zambia | ZAMBIA | CID002854 | Unknown |
| Gold | Valcambi S.A. | SWITZERLAND | CID002003 | Yes |
| Gold | Western Australian Mint trading as The Perth Mint | AUSTRALIA | CID002030 | Yes |
| Gold | WIELAND Edelmetalle GmbH | GERMANY | CID002778 | Yes |
| Gold | Yamamoto Precious Metal Co., Ltd. | JAPAN | CID002100 | Yes |
| Gold | Yokohama Metal Co., Ltd. | JAPAN | CID002129 | Yes |
| Gold | Yunnan Copper Industry Co., Ltd. | CHINA | CID000197 | Unknown |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | CHINA | CID002224 | Yes |
| Tantalum | Asaka Riken Co., Ltd. | JAPAN | CID000092 | Yes |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd. | CHINA | CID000211 | Yes |
| Tantalum | D Block Metals, LLC | UNITED STATES | CID002504 | Yes |
| Tantalum | Duoluoshan | CHINA | CID000410 | Unknown |
| Tantalum | Exotech Inc. | UNITED STATES | CID000456 | Yes |
| Tantalum | F&X Electro-Materials Ltd. | CHINA | CID000460 | Yes |
| Tantalum | FIR Metals & Resource Ltd. | CHINA | CID002505 | Yes |
| Tantalum | Global Advanced Metals Aizu | JAPAN | CID002558 | Yes |
| Tantalum | Global Advanced Metals Boyertown | UNITED STATES | CID002557 | Yes |
| Tantalum | Guangdong Rising Rare Metals-EO Materials Ltd. | CHINA | CID000291 | Yes |
| Tantalum | Guangdong Zhiyuan New Material Co., Ltd. | CHINA | CID000616 | Yes |
| Tantalum | H.C. Starck Co., Ltd. | THAILAND | CID002544 | Yes |
| Tantalum | H.C. Starck Hermsdorf GmbH | GERMANY | CID002547 | Yes |
| Tantalum | H.C. Starck Inc. | UNITED STATES | CID002548 | Yes |
| Tantalum | H.C. Starck Ltd. | JAPAN | CID002549 | Yes |
| Tantalum | H.C. Starck Smelting GmbH & Co. KG | GERMANY | CID002550 | Yes |
| Tantalum | H.C. Starck Tantalum and Niobium GmbH | GERMANY | CID002545 | Yes |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd. | CHINA | CID002492 | Yes |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd. | CHINA | CID002512 | Yes |

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| Tantalum | Jiangxi Tuohong New Raw Material | CHINA | CID002842 | Yes |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd. | CHINA | CID000914 | Yes |
| Tantalum | Jiujiang Tanbre Co., Ltd. | CHINA | CID000917 | Yes |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd. | CHINA | CID002506 | Yes |
| Tantalum | KEMET Blue Metals | MEXICO | CID002539 | Yes |
| Tantalum | KEMET Blue Powder | UNITED STATES | CID002568 | Yes |
| Tantalum | King-Tan Tantalum Industry Ltd. | CHINA | CID000973 | Yes |
| Tantalum | LSM Brasil S.A. | BRAZIL | CID001076 | Yes |
| Tantalum | Metallurgical Products India Pvt., Ltd. | INDIA | CID001163 | Yes |
| Tantalum | Mineracao Taboca S.A. | BRAZIL | CID001175 | Yes |
| Tantalum | Mitsui Mining and Smelting Co., Ltd. | JAPAN | CID001192 | Yes |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd. | CHINA | CID001277 | Yes |
| Tantalum | NPM Silmet AS | ESTONIA | CID001200 | Yes |
| Tantalum | Power Resources Ltd. | MACEDONIA | CID002847 | Yes |
| Tantalum | QuantumClean | UNITED STATES | CID001508 | Yes |
| Tantalum | Resind Industria e Comercio Ltda. | BRAZIL | CID002707 | Yes |
| Tantalum | RFH Tantalum Smeltry Co., Ltd. | CHINA | CID001522 | Yes |
| Tantalum | Solikamsk Magnesium Works OAO | RUSSIAN FEDERATION | CID001769 | Yes |
| Tantalum | Taki Chemicals | JAPAN | CID001869 | Yes |
| Tantalum | Telex Metals | UNITED STATES | CID001891 | Yes |
| Tantalum | Ulba Metallurgical Plant JSC | KAZAKHSTAN | CID001969 | Yes |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd. | CHINA | CID002508 | Yes |
| Tantalum | Yichun Jin Yang Rare Metal Co., Ltd. | CHINA | CID002307 | Yes |
| Tin | Alpha | UNITED STATES | CID000292 | Yes |
| Tin | An Vinh Joint Stock Mineral Processing Company | VIET NAM | CID002703 | Unknown |
| Tin | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | CHINA | CID000228 | Yes |
| Tin | China Tin Group Co., Ltd. | CHINA | CID001070 | Yes |
| Tin | CNMC (Guangxi) PGMA Co., Ltd. | CHINA | CID000278 | Unknown |
| Tin | CV Ayi Jaya | INDONESIA | CID002570 | Yes |
| Tin | CV Dua Sekawan | INDONESIA | CID002592 | Yes |
| Tin | CV Gita Pesona | INDONESIA | CID000306 | Yes |
| Tin | CV Tiga Sekawan | INDONESIA | CID002593 | Yes |
| Tin | CV United Smelting | INDONESIA | CID000315 | Yes |
| Tin | CV Venus Inti Perkasa | INDONESIA | CID002455 | Yes |
| Tin | Dowa | JAPAN | CID000402 | Yes |

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| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | VIET NAM | CID002572 | Unknown |
| Tin | EM Vinto | BOLIVIA | CID000438 | Yes |
| Tin | Estanho de Rondônia S.A. | BRAZIL | CID000448 | Unknown |
| Tin | Fenix Metals | POLAND | CID000468 | Yes |
| Tin | Gejiu Fengming Metallurgy Chemical Plant | CHINA | CID002848 | Yes |
| Tin | Gejiu Jinye Mineral Company | CHINA | CID002859 | Yes |
| Tin | Gejiu Kai Meng Industry and Trade LLC | CHINA | CID000942 | Yes |
| Tin | Gejiu Non-Ferrous Metal Processing Co., Ltd. | CHINA | CID000538 | Yes |
| Tin | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | CHINA | CID001908 | Yes |
| Tin | Gejiu Zili Mining And Metallurgy Co., Ltd. | CHINA | CID000555 | Unknown |
| Tin | Guangdong Hanhe Non-ferrous Metal Limited Company | CHINA | CID003116 | Yes |
| Tin | Guanyang Guida Nonferrous Metal Smelting Plant | CHINA | CID002849 | Yes |
| Tin | HuiChang Hill Tin Industry Co., Ltd. | CHINA | CID002844 | Yes |
| Tin | Huichang Jinshunda Tin Co., Ltd. | CHINA | CID000760 | Yes |
| Tin | Jiangxi Ketai Advanced Material Co., Ltd. | CHINA | CID000244 | Yes |
| Tin | Jiangxi New Nanshan Technology Ltd. | CHINA | CID001231 | Yes |
| Tin | Magnu's Minerais Metais e Ligas Ltda. | BRAZIL | CID002468 | Yes |
| Tin | Malaysia Smelting Corporation (MSC) | MALAYSIA | CID001105 | Yes |
| Tin | Melt Metais e Ligas S.A. | BRAZIL | CID002500 | Yes |
| Tin | Metallic Resources, Inc. | UNITED STATES | CID001142 | Yes |
| Tin | Metallo Belgium N.V. | BELGIUM | CID002773 | Yes |
| Tin | Metallo Spain S.L.U. | SPAIN | CID002774 | Yes |
| Tin | Mineracao Taboca S.A. | BRAZIL | CID001173 | Yes |
| Tin | Minsur | PERU | CID001182 | Yes |
| Tin | Mitsubishi Materials Corporation | JAPAN | CID001191 | Yes |
| Tin | Modeltech Sdn Bhd | MALAYSIA | CID002858 | Unknown |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company | VIET NAM | CID002573 | Unknown |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd. | THAILAND | CID001314 | Yes |
| Tin | O.M. Manufacturing Philippines, Inc. | PHILIPPINES | CID002517 | Yes |
| Tin | Operaciones Metalurgical S.A. | BOLIVIA | CID001337 | Yes |
| Tin | PT Aries Kencana Sejahtera | INDONESIA | CID000309 | Yes |
| Tin | PT Artha Cipta Langgeng | INDONESIA | CID001399 | Yes |
| Tin | PT ATD Makmur Mandiri Jaya | INDONESIA | CID002503 | Yes |
| Tin | PT Babel Inti Perkasa | INDONESIA | CID001402 | Yes |
| Tin | PT Bangka Prima Tin | INDONESIA | CID002776 | Yes |
| Tin | PT Bangka Tin Industry | INDONESIA | CID001419 | Yes |

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| Tin | PT Belitung Industri Sejahtera | INDONESIA | CID001421 | Yes |
| Tin | PT Bukit Timah | INDONESIA | CID001428 | Yes |
| Tin | PT DS Jaya Abadi | INDONESIA | CID001434 | Yes |
| Tin | PT Eunindo Usaha Mandiri | INDONESIA | CID001438 | Yes |
| Tin | PT Inti Stania Prima | INDONESIA | CID002530 | Yes |
| Tin | PT Karimun Mining | INDONESIA | CID001448 | Yes |
| Tin | PT Kijang Jaya Mandiri | INDONESIA | CID002829 | Yes |
| Tin | PT Lautan Harmonis Sejahtera | INDONESIA | CID002870 | Yes |
| Tin | PT Menara Cipta Mulia | INDONESIA | CID002835 | Yes |
| Tin | PT Mitra Stania Prima | INDONESIA | CID001453 | Yes |
| Tin | PT O.M. Indonesia | INDONESIA | CID002757 | Yes |
| Tin | PT Panca Mega Persada | INDONESIA | CID001457 | Yes |
| Tin | PT Premium Tin Indonesia | INDONESIA | CID000313 | Yes |
| Tin | PT Prima Timah Utama | INDONESIA | CID001458 | Yes |
| Tin | PT Refined Bangka Tin | INDONESIA | CID001460 | Yes |
| Tin | PT Sariwiguna Binasantosa | INDONESIA | CID001463 | Yes |
| Tin | PT Stanindo Inti Perkasa | INDONESIA | CID001468 | Yes |
| Tin | PT Sukses Inti Makmur | INDONESIA | CID002816 | Yes |
| Tin | PT Sumber Jaya Indah | INDONESIA | CID001471 | Yes |
| Tin | PT Timah (Persero) Tbk Kundur | INDONESIA | CID001477 | Yes |
| Tin | PT Timah (Persero) Tbk Mentok | INDONESIA | CID001482 | Yes |
| Tin | PT Tinindo Inter Nusa | INDONESIA | CID001490 | Yes |
| Tin | PT Tommy Utama | INDONESIA | CID001493 | Yes |
| Tin | Resind Industria e Comercio Ltda. | BRAZIL | CID002706 | Yes |
| Tin | Rui Da Hung | TAIWAN | CID001539 | Yes |
| Tin | Soft Metais Ltda. | BRAZIL | CID001758 | Yes |
| Tin | Super Ligas | Brazil | CID002756 | Unknown |
| Tin | Thaisarco | THAILAND | CID001898 | Yes |
| Tin | Tuyen Quang Non-Ferrous Metals Joint Stock Company | VIET NAM | CID002574 | Unknown |
| Tin | White Solder Metalurgia e Mineração Ltda. | BRAZIL | CID002036 | Yes |
| Tin | Yunnan Chengfeng Non-ferrous Metals Co., Ltd. | CHINA | CID002158 | Yes |
| Tin | Yunnan Tin Company Limited | CHINA | CID002180 | Yes |
| Tungsten | A.L.M.T. TUNGSTEN Corp. | JAPAN | CID000004 | Yes |
| Tungsten | ACL Metais Eireli | BRAZIL | CID002833 | Yes |
| Tungsten | Asia Tungsten Products Vietnam Ltd. | VIET NAM | CID002502 | Yes |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd. | CHINA | CID002513 | Yes |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd. | CHINA | CID000258 | Yes |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd. | CHINA | CID000499 | Yes |
| Tungsten | Ganzhou Haichuang Tungsten Co., Ltd. | CHINA | CID002645 | Unknown |

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| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd. | CHINA | CID000875 | Yes |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd. | CHINA | CID002315 | Yes |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd. | CHINA | CID002494 | Yes |
| Tungsten | Ganzhou Yatai Tungsten Co., Ltd. | CHINA | CID002536 | Unknown |
| Tungsten | Global Tungsten & Powders Corp. | UNITED STATES | CID000568 | Yes |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd. | CHINA | CID000218 | Yes |
| Tungsten | H.C. Starck Smelting GmbH & Co.KG | GERMANY | CID002542 | Yes |
| Tungsten | H.C. Starck Tungsten GmbH | GERMANY | CID002541 | Yes |
| Tungsten | Hunan Chenzhou Mining Co., Ltd. | CHINA | CID000766 | Yes |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji | CHINA | CID002579 | Yes |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd. | CHINA | CID000769 | Yes |
| Tungsten | Hydrometallurg, JSC | RUSSIAN FEDERATION | CID002649 | Yes |
| Tungsten | Japan New Metals Co., Ltd. | JAPAN | CID000825 | Yes |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd. | CHINA | CID002551 | Yes |
| Tungsten | Jiangxi Dayu Longxintai Tungsten Co., Ltd. | CHINA | CID002647 | Unknown |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd. | CHINA | CID002321 | Yes |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. | CHINA | CID002313 | Unknown |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | CHINA | CID002318 | Yes |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd. | CHINA | CID002317 | Yes |
| Tungsten | Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd. | CHINA | CID002535 | Yes |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd. | CHINA | CID002316 | Yes |
| Tungsten | Kennametal Fallon | UNITED STATES | CID000966 | Yes |
| Tungsten | Kennametal Huntsville | UNITED STATES | CID000105 | Yes |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd. | CHINA | CID002319 | Yes |
| Tungsten | Moliren Ltd | RUSSIAN FEDERATION | CID002845 | Yes |
| Tungsten | Niagara Refining LLC | UNITED STATES | CID002589 | Yes |
| Tungsten | Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC | VIET NAM | CID002543 | Yes |
| Tungsten | Philippine Chuangxin Industrial Co., Inc. | PHILIPPINES | CID002827 | Yes |
| Tungsten | South-East Nonferrous Metal Company Limited of Hengyang City | CHINA | CID002815 | Yes |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd. | VIET NAM | CID001889 | Yes |
| Tungsten | Unecha Refractory metals plant | RUSSIAN FEDERATION | CID002724 | Yes |

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| Tungsten | Vietnam Youngsun Tungsten Industry Co., Ltd. | VIET NAM | CID002011 | Yes |
| Tungsten | Wolfram Bergbau und Hütten AG | AUSTRIA | CID002044 | Yes |
| Tungsten | Woltech Korea Co., Ltd. | KOREA, REPUBLIC OF | CID002843 | Yes |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd. | CHINA | CID002320 | Yes |
| Tungsten | Xiamen Tungsten Co., Ltd. | CHINA | CID002082 | Yes |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd. | CHINA | CID002830 | Yes |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd. | CHINA | CID002095 | Yes |

Annex B

The list below sets out possible countries of origin of 3TGs used in the manufacture of our products containing 3TGs. The list is based on publicly available information, our reasonable country of origin investigation, and other due diligence. However, for the reasons described in the CMR, these possible countries of origin cannot be linked to our products with reasonable certainty.

Argentina, Australia, Austria, Belgium, Bolivia, Brazil, Cambodia, Canada, Chile, China, Columbia, Cote D'Ivoire, Czech Republic, Djibouti, Ecuador, Egypt, Estonia, Ethiopia, France, Germany, Guyana, Hungary, India, Indonesia, Ireland, Israel, Japan, Kazakhstan, Laos, Luxembourg, Madagascar, Malaysia, Mongolia, Myanmar, Namibia, Netherlands, Nigeria, Peru, Portugal, Russia, Sierra Leone, Singapore, Slovakia, South Korea, Spain, Suriname, Switzerland, Taiwan, Thailand, United Kingdom, United States, Vietnam, Zimbabwe, Kenya, Mozambique, South Africa, Democratic Republic of the Congo, Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.