

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

**FORM SD**

Specialized Disclosure Report

**ASTEC INDUSTRIES, INC.**

(Exact name of registrant as specified in its charter)

Tennessee  
(State or other jurisdiction  
of incorporation or organization)

001-11595  
(Commission  
File Number)

62-0873631  
(IRS Employer  
Identification No.)

1725 Shepherd Road  
Chattanooga, Tennessee  
(Address of principal executive offices)

37421  
(Zip Code)

David C. Silvius  
(Name and telephone number, including area code, of the person to contact in connection with this report.) (423) 899-5898

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.

**Section 1 – Conflict Minerals Disclosure**

**Item 1.01 Conflict Minerals Disclosure and Report**

In accordance with the disclosure requirements promulgated by the U.S. Securities and Exchange Commission, Astec Industries, Inc. (the "Company") has undertaken efforts to determine its conflict minerals<sup>1</sup> reporting requirements for the period from January 1 to December 31, 2017.

The Company has filed this Specialized Disclosure Report and the associated Conflict Minerals Report, which appears as Exhibit 1.01 hereto and is publicly available on the Company's website at <https://www.astecindustries.com/corporate-citizenship/conflict-minerals-policy.html>.

**Item 1.02 Exhibit**

The Company's Conflict Minerals Report is provided as Exhibit 1.01 hereto.

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**Section 2 Exhibits**

**Item 2.01 Exhibits**

The following exhibit is filed as part of this report.

Exhibit 1.01 – Astec Industries, Inc.'s Conflict Minerals Report for the period January 1 to December 31, 2017.

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**SIGNATURE**

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.

Astec Industries, Inc.

By: /s/ David C. Silvious  
David C. Silvious  
Chief Financial Officer, Vice President, and Treasurer

Date: May 16, 2018

<sup>1</sup> The term "conflict mineral" is defined in Section 1502(e)(4) of the Dodd-Frank Wall Street Reform and Consumer Protection Act as (A) columbite-tantalite, also known as coltan (the metal ore from which tantalum is extracted); cassiterite (the metal ore from which tin is extracted); gold; wolframite (the metal ore from which tungsten is extracted); or their derivatives; or (B) any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo ("DRC") or an adjoining country.

CONFLICT MINERALS REPORT OF  
ASTEC INDUSTRIES, INC.  
FOR THE REPORTING PERIOD FROM  
JANUARY 1 TO DECEMBER 31, 2017

**I. Introduction**

This is the Conflict Minerals<sup>1</sup> Report of Astec Industries, Inc. ("we," "our," "us," or the "Company") prepared for calendar year 2017 in accordance with Rule 13p-1 ("Rule 13p-1") under the Securities Exchange Act of 1934 (the "Act"). Numerous terms in this Report are defined in Rule 13p-1 of the Act and SEC Release No. 34-67716 (August 22, 2012) under the Act (the "Adopting Release"). The reader is referred to these sources for the definitions of defined terms contained herein.

In accordance with Rule 13p-1, we undertook efforts to determine the presence and source of the conflict minerals within our products. The Company designed its efforts in conformity with the internationally recognized due diligence framework set forth in 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*<sup>2</sup> ("OECD Due Diligence Guidance") and related Supplements.

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

## **II. Overview**

### **Company Profile**

The Company is a Tennessee corporation which was incorporated in 1972. The Company designs, engineers, manufactures and markets equipment and components used primarily in road building and related construction activities as well as other products discussed below. The Company's products are used in each phase of road building, from quarrying and crushing the aggregate to application of the road surface. The Company also manufactures certain equipment and components unrelated to road construction, including equipment for the mining, quarrying, construction and demolition industries and port and rail yard operators; gas and oil drilling rigs; water well and geothermal drilling rigs; industrial heat transfer equipment; commercial whole-tree pulpwood chippers; horizontal grinders; blower trucks; concrete plants; wood pellet plants; commercial and industrial burners; and combustion control systems. The Company's subsidiaries hold 88 United States and 103 foreign patents and have an additional 65 United States and 76 foreign patent applications pending. The Company has been responsible for many technological and engineering innovations in the industries in which it operates. The Company's products are marketed both domestically and internationally. In addition to equipment sales, the Company manufactures and sells replacement parts for equipment in each of its product lines and replacement parts for some competitors' equipment. The distribution and sale of replacement parts is an integral part of the Company's business. We are subject to this rule as we have determined that, during 2017, conflict minerals were likely necessary to the functionality or production of products we manufactured or contracted to manufacture. The Company, as a purchaser of component parts, is many steps removed from the mining of conflict minerals. We do not purchase raw ore or unrefined conflict minerals and we conduct no purchasing activities directly in the DRC or adjoining countries.

### **Conflict Minerals Policy**

The Company developed a policy statement to support the goals expressed by Congress in enacting Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. The policy highlights the Company's commitment to complying with the reporting and due diligence obligations required by the SEC rule and the Company's expectations from its suppliers. In addition, the policy includes language encouraging suppliers to source responsibly. The policy resides on our corporate website (<https://www.astecindustries.com/corporate-citizenship/conflict-minerals-policy.html>).

### **Reasonable Country of Origin Inquiry Information**

We have conducted a good faith reasonable country of origin inquiry ("RCOI") to determine whether the necessary conflict minerals originated in the DRC or an adjoining country or came from recycled or scrap sources.

The Company's RCOI process included reviewing the products manufactured or contracted to be manufactured during the Reporting Period to identify products that should be deemed in-scope as described by the Adopting Release and conducting an inquiry of our direct suppliers of the in-scope products using the Responsible Minerals Initiative's ("RMI") Conflict Minerals Reporting Template ("CMRT"). Based on the results of our RCOI which indicated sourcing from the DRC or an adjoining country, we exercised due diligence on the source and chain of custody of the conflict minerals in accordance with the OECD Due Diligence Guidance. Our due diligence efforts are discussed further in this Conflict Minerals Report.

### **Due Diligence Program Design**

The Company designed its conflict minerals program to conform, in all material respects, with the five-step framework of the OECD Due Diligence Guidance, the Supplement on Tin, Tantalum, and Tungsten, and the Supplement on Gold, specifically as they relate to our position in the minerals supply chain as a "downstream" company:

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

### **III. Due Diligence Measures Performed by The Company**

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

Step 1: Establish strong company management systems

- a. Conflict minerals team – The Company established a conflict minerals team that includes individuals from the relevant business units and departments, including compliance, finance, procurement, sales, and legal. The team was structured to include the involvement from those in upper management roles to ensure that critical information, including the Company's conflict minerals policy, reached relevant employees and suppliers.
- b. Conflict minerals policy – The Company adopted and published a policy establishing the expectations of our suppliers. The policy resides on our corporate website.
- c. Internal engagement – We developed a training program to educate employees on our conflict minerals process, the goals of our program, and our reporting obligations as a supplier and a public filer.

- d. Supplier engagement – The Company communicated its conflict minerals policy and provided educational materials to our in-scope suppliers. Suppliers were informed when the request for information was initiated on the conflict minerals disclosure requirements as well as recommendations for developing, implementing, and documenting a conflict minerals compliance program. Stakeholders can communicate directly and confidentially with our compliance officer.
- e. Company level grievance mechanism – As recommended by the OECD Due Diligence Guidance, the Company has a grievance mechanism in place as a risk-awareness system for conflict minerals issues.
- f. Records management – The Company will maintain records relating to our conflict minerals program in accordance with the recommended record retention guidelines of five years.

#### Step 2: Identify and assess risks in the supply chain

We performed the following steps as part of our risk assessment process:

- a. Identified products in scope – Our conflict minerals team conducted a detailed review of the products manufactured or contracted to be manufactured during the Reporting Period to identify products that should be deemed in-scope as described by the Adopting Release.
- b. Conducted RCOI – The Company utilized the industry-developed CMRT to query our suppliers for conflict minerals information. We requested this information from the Tier 1 suppliers who provide materials and components for the products deemed in-scope by our conflict minerals team. We evaluated the responses from the templates submitted by our suppliers to determine our reporting obligation based on this RCOI. See Appendix I for a list of countries of origin identified through the RCOI process.
- c. Completed additional follow-up – The Company contacted direct suppliers that did not respond to our request for conflict minerals information by the requested date. We also worked to clarify and validate the accuracy of information provided by our suppliers.
- d. Identified smelters or refiners ("SORs") – The Company compiled a list of SORs in our supply chain using our suppliers' responses in their CMRTs. The Company reconciled this list to the list of smelter facilities designated by the RMI's Responsible Minerals Assurance Process ("RMAP"). The RMAP completes independent, third-party audits of smelters and refiners to determine which can be validated as having systems in place that ensure the minerals are responsibly sourced according to the OECD Due Diligence Guidance. We have provided that list in this report.

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

We performed the following steps as part of our risk management plan:

- a. Designed and implemented a plan – The Company used established risk rating criteria to evaluate suppliers based on the responses provided within their CMRT, as well as, any additional documentation furnished to support those responses and the suppliers' due diligence processes. In the coming year, the resulting risk ratings will be used to develop specific supplier outreach and training to address the identified risks and to take corrective actions with suppliers found not in compliance with the Company's conflict minerals policy.

b. Verified SORs – As part of the risk mitigation process, the Company reconciled the list of SORs collected from suppliers to the list of smelter facilities validated by the RMI.

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

The Company is using information provided by independent third party audit programs, including the RMI, London Bullion Market Association (LBMA), and Responsible Jewelry Council (RJC), to confirm the existence and verify the OECD-conformance status of SORs identified during our due diligence.

For smelters that had not been audited as conformant, the Company sent a communication to encourage participation in the RMAP.

Step 5: Report annually on supply chain due diligence

Accordingly, this Conflict Minerals Report has been filed with the SEC and is available on our website at <https://www.astecindustries.com/corporate-citizenship/conflict-minerals-policy.html>.

#### **IV. Product Description; Processing Facilities**

**Product Description** – The Company's business units are aggregated into three reportable business segments based upon the nature of the product or services produced, the type of customer for the products, the similarity of economic characteristics, the manner in which management reviews results and the nature of the production process, among other considerations. The Company's reportable business segments are (i) Infrastructure Group, (ii) Aggregate and Mining Group and (iii) Energy Group.

**Processing Facilities** – Based on our due diligence process and the information received from our suppliers, the following facilities were identified by the Company's suppliers as the smelters and refiners of the tin, tantalum, tungsten and/or gold present in and necessary to the functionality of products manufactured by the Company in the calendar year ended December 31, 2017. The information from our suppliers is still evolving and may contain company-level declarations. As such, this smelter list is presented in good faith as the best information we have to date. This list may contain smelters that are not in our supply chain and/or there may be other smelters not yet identified in our due diligence process. We will continue to update the list as our information and the relevant third-party data from RMI, LBMA, and RJC improves.

| Metal | Smelter Name  | Country                  | Smelter ID |
|-------|---|--------------------------|------------|
| Gold  | Abington Reldan Metals, LLC                                   | UNITED STATES OF AMERICA | CID002708  |
| Gold  | Advanced Chemical Company                                     | UNITED STATES OF AMERICA | CID000015  |
| Gold  | Aida Chemical Industries Co., Ltd.                            | JAPAN                    | CID000019  |
| Gold  | Al Etihad Gold Refinery DMCC                                  | UNITED ARAB EMIRATES     | CID002560  |
| Gold  | Allgemeine Gold-und Silberscheideanstalt A.G.                 | GERMANY                  | CID000035  |
| Gold  | Almalyk Mining and Metallurgical Complex (AMMC)               | UZBEKISTAN               | CID000041  |
| Gold  | AngloGold Ashanti Corrego do Sitio Mineracao                  | BRAZIL                   | CID000058  |
| Gold  | Argor-Heraeus S.A.  | SWITZERLAND              | CID000077  |
| Gold  | Asahi Pretec Corp.  | JAPAN                    | CID000082  |
| Gold  | Asahi Refining Canada Ltd.                                    | CANADA                   | CID000924  |
| Gold  | Asahi Refining USA Inc.                                       | UNITED STATES OF AMERICA | CID000920  |
| Gold  | Asaka Riken Co., Ltd.   | JAPAN                    | CID000090  |
| Gold  | Atasay Kuyumculuk Sanayi Ve Ticaret A.S.                      | TURKEY                   | CID000103  |
| Gold  | AU Traders and Refiners                                       | SOUTH AFRICA             | CID002850  |
| Gold  | Aurubis AG  | GERMANY                  | CID000113  |
| Gold  | Bangalore Refinery  | INDIA                    | CID002863  |
| Gold  | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | PHILIPPINES              | CID000128  |
| Gold  | Boliden AB  | SWEDEN                   | CID000157  |
| Gold  | C. Hafner GmbH + Co. KG                                       | GERMANY                  | CID000176  |
| Gold  | Caridad   | MEXICO                   | CID000180  |
| Gold  | CCR Refinery - Glencore Canada Corporation                    | CANADA                   | CID000185  |
| Gold  | Cendres + Metaux S.A.   | SWITZERLAND              | CID000189  |
| Gold  | Chimet S.p.A.   | ITALY                    | CID000233  |
| Gold  | Chugai Mining   | JAPAN                    | CID000264  |
| Gold  | Daejin Indus Co., Ltd.  | KOREA, REPUBLIC OF       | CID000328  |
| Gold  | Daye Non-Ferrous Metals Mining Ltd.                           | CHINA                    | CID000343  |
| Gold  | Degussa Sonne / Mond Goldhandel GmbH                          | GERMANY                  | CID002867  |
| Gold  | DODUCO Contacts and Refining GmbH                             | GERMANY                  | CID000362  |
| Gold  | Dowa  | JAPAN                    | CID000401  |
| Gold  | DSC (Do Sung Corporation)                                     | KOREA, REPUBLIC OF       | CID000359  |
| Gold  | Eco-System Recycling Co., Ltd.                                | JAPAN                    | CID000425  |
| Gold  | Elemental Refining, LLC                                       | UNITED STATES OF AMERICA | CID001322  |
| Gold  | Emirates Gold DMCC  | UNITED ARAB EMIRATES     | CID002561  |
| Gold  | GCC Gujrat Gold Centre Pvt. Ltd.                              | INDIA                    | CID002852  |
| Gold  | Geib Refining Corporation                                     | UNITED STATES OF AMERICA | CID002459  |
| Gold  | Gold Refinery of Zijin Mining Group Co., Ltd.                 | CHINA                    | CID002243  |
| Gold  | Great Wall Precious Metals Co., Ltd. of CBPM                  | CHINA                    | CID001909  |
| Gold  | Guangdong Jinding Gold Limited                                | CHINA                    | CID002312  |
| Gold  | Hangzhou Fuchunjiang Smelting Co., Ltd.                       | CHINA                    | CID000671  |
| Gold  | HeeSung Metal Ltd.  | KOREA, REPUBLIC OF       | CID000689  |

|      |   |                          |           |
|------|---|--------------------------|-----------|
| Gold | Heimerle + Meule GmbH   | GERMANY                  | CID000694 |
| Gold | Heraeus Metals Hong Kong Ltd.                                   | CHINA                    | CID000707 |
| Gold | Heraeus Precious Metals GmbH & Co. KG                           | GERMANY                  | CID000711 |
| Gold | Hunan Chenzhou Mining Co., Ltd.                                 | CHINA                    | CID000767 |
| Gold | HwaSeong CJ CO., LTD.   | KOREA, REPUBLIC OF       | CID000778 |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | CHINA                    | CID000801 |
| Gold | Ishifuku Metal Industry Co., Ltd.                               | JAPAN                    | CID000807 |
| Gold | Istanbul Gold Refinery  | TURKEY                   | CID000814 |
| Gold | Italpreziosi  | ITALY                    | CID002765 |
| Gold | Japan Mint  | JAPAN                    | CID000823 |
| Gold | Jiangxi Copper Co., Ltd.  | CHINA                    | CID000855 |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant             | RUSSIAN FEDERATION       | CID000927 |
| Gold | JSC Uralelectromed  | RUSSIAN FEDERATION       | CID000929 |
| Gold | JX Nippon Mining & Metals Co., Ltd.                             | JAPAN                    | CID000937 |
| Gold | Kaloti Precious Metals  | UNITED ARAB EMIRATES     | CID002563 |
| Gold | Kazakhmys Smelting LLC  | KAZAKHSTAN               | CID000956 |
| Gold | Kazzinc   | KAZAKHSTAN               | CID000957 |
| Gold | Kennecott Utah Copper LLC                                       | UNITED STATES OF AMERICA | CID000969 |
| Gold | KGHM Polska Miedz Spolka Akcyjna                                | POLAND                   | CID002511 |
| Gold | Kojima Chemicals Co., Ltd.                                      | JAPAN                    | CID000981 |
| Gold | Korea Zinc Co., Ltd.  | KOREA, REPUBLIC OF       | CID002605 |
| Gold | Kyrgyzaltyn JSC   | KYRGYZSTAN               | CID001029 |
| Gold | Kyshtym Copper-Electrolytic Plant ZAO                           | RUSSIAN FEDERATION       | CID002865 |
| Gold | L'azurde Company For Jewelry                                    | SAUDI ARABIA             | CID001032 |
| Gold | Lingbao Gold Co., Ltd.  | CHINA                    | CID001056 |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd.                      | CHINA                    | CID001058 |
| Gold | L'Orfebre S.A.  | ANDORRA                  | CID002762 |
| Gold | LS-NIKKO Copper Inc.  | KOREA, REPUBLIC OF       | CID001078 |
| Gold | Luoyang Zijin Yinhui Gold Refinery Co., Ltd.                    | CHINA                    | CID001093 |
| Gold | Marsam Metals   | BRAZIL                   | CID002606 |
| Gold | Materion  | UNITED STATES OF AMERICA | CID001113 |
| Gold | Matsuda Sangyo Co., Ltd.  | JAPAN                    | CID001119 |
| Gold | Metalor Technologies (Hong Kong) Ltd.                           | CHINA                    | CID001149 |
| Gold | Metalor Technologies (Singapore) Pte., Ltd.                     | SINGAPORE                | CID001152 |
| Gold | Metalor Technologies (Suzhou) Ltd.                              | CHINA                    | CID001147 |
| Gold | Metalor Technologies S.A.                                       | SWITZERLAND              | CID001153 |
| Gold | Metalor USA Refining Corporation                                | UNITED STATES OF AMERICA | CID001157 |
| Gold | Metalurgica Met-Mex Penoles S.A. De C.V.                        | MEXICO                   | CID001161 |
| Gold | Mitsubishi Materials Corporation                                | JAPAN                    | CID001188 |
| Gold | Mitsui Mining and Smelting Co., Ltd.                            | JAPAN                    | CID001193 |

|      |   |                           |           |
|------|---|---------------------------|-----------|
| Gold | MMTC-PAMP India Pvt., Ltd.  | INDIA                     | CID002509 |
| Gold | Modeltech Sdn Bhd   | MALAYSIA                  | CID002857 |
| Gold | Morris and Watson   | NEW ZEALAND               | CID002282 |
| Gold | Morris and Watson Gold Coast  | AUSTRALIA                 | CID002866 |
| Gold | Moscow Special Alloys Processing Plant                                      | RUSSIAN FEDERATION        | CID001204 |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.S.                                      | TURKEY                    | CID001220 |
| Gold | Navoi Mining and Metallurgical Combinat                                     | UZBEKISTAN                | CID001236 |
| Gold | Nihon Material Co., Ltd.  | JAPAN                     | CID001259 |
| Gold | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH                 | AUSTRIA                   | CID002779 |
| Gold | Ohura Precious Metal Industry Co., Ltd.                                     | JAPAN                     | CID001325 |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | RUSSIAN FEDERATION        | CID001326 |
| Gold | OJSC Novosibirsk Refinery   | RUSSIAN FEDERATION        | CID000493 |
| Gold | PAMP S.A.   | SWITZERLAND               | CID001352 |
| Gold | Pease & Curren  | UNITED STATES OF AMERICA  | CID002872 |
| Gold | Penglai Penggang Gold Industry Co., Ltd.                                    | CHINA                     | CID001362 |
| Gold | Planta Recuperadora de Metales SpA  | CHILE                     | CID002919 |
| Gold | Prioksky Plant of Non-Ferrous Metals  | RUSSIAN FEDERATION        | CID001386 |
| Gold | PT Aneka Tambang (Persero) Tbk  | INDONESIA                 | CID001397 |
| Gold | PX Precinox S.A.  | SWITZERLAND               | CID001498 |
| Gold | Rand Refinery (Pty) Ltd.  | SOUTH AFRICA              | CID001512 |
| Gold | Refinery of Seemine Gold Co., Ltd.  | CHINA                     | CID000522 |
| Gold | Remondis Argentia B.V.  | NETHERLANDS               | CID002582 |
| Gold | Republic Metals Corporation   | UNITED STATES OF AMERICA  | CID002510 |
| Gold | Royal Canadian Mint   | CANADA                    | CID001534 |
| Gold | SAAMP   | FRANCE                    | CID002761 |
| Gold | Sabin Metal Corp.   | UNITED STATES OF AMERICA  | CID001546 |
| Gold | Safimet S.p.A   | ITALY                     | CID002973 |
| Gold | SAFINA A.S.   | CZECH REPUBLIC            | CID002290 |
| Gold | Sai Refinery  | INDIA                     | CID002853 |
| Gold | Samduck Precious Metals   | KOREA, REPUBLIC OF        | CID001555 |
| Gold | Samwon Metals Corp.   | KOREA, REPUBLIC OF        | CID001562 |
| Gold | SAXONIA Edelmetalle GmbH  | GERMANY                   | CID002777 |
| Gold | SEMPSA Joyeria Plateria S.A.  | SPAIN                     | CID001585 |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd.                     | CHINA                     | CID001619 |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.                           | CHINA                     | CID001622 |
| Gold | Sichuan Tianze Precious Metals Co., Ltd.                                    | CHINA                     | CID001736 |
| Gold | Singway Technology Co., Ltd.  | TAIWAN, PROVINCE OF CHINA | CID002516 |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals                        | RUSSIAN FEDERATION        | CID001756 |
| Gold | Solar Applied Materials Technology Corp.                                    | TAIWAN, PROVINCE OF CHINA | CID001761 |
| Gold | State Research Institute Center for Physical Sciences and Technology        | LITHUANIA                 | CID003153 |

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|----------|---|--------------------------|-----------|
| Gold     | Sumitomo Metal Mining Co., Ltd.                     | JAPAN                    | CID001798 |
| Gold     | SungEel HiMetal Co., Ltd.                           | KOREA, REPUBLIC OF       | CID002918 |
| Gold     | T.C.A S.p.A   | ITALY                    | CID002580 |
| Gold     | Tanaka Kikinzoku Kogyo K.K.                         | JAPAN                    | CID001875 |
| Gold     | The Refinery of Shandong Gold Mining Co., Ltd.      | CHINA                    | CID001916 |
| Gold     | Tokuriki Honten Co., Ltd.                           | JAPAN                    | CID001938 |
| Gold     | Tongling Nonferrous Metals Group Co., Ltd.          | CHINA                    | CID001947 |
| Gold     | TOO Tau-Ken-Altyyn                                  | KAZAKHSTAN               | CID002615 |
| Gold     | Torecom   | KOREA, REPUBLIC OF       | CID001955 |
| Gold     | Umicore Brasil Ltda.                                | BRAZIL                   | CID001977 |
| Gold     | Umicore Precious Metals Thailand                    | THAILAND                 | CID002314 |
| Gold     | Umicore S.A. Business Unit Precious Metals Refining | BELGIUM                  | CID001980 |
| Gold     | United Precious Metal Refining, Inc.                | UNITED STATES OF AMERICA | CID001993 |
| Gold     | Universal Precious Metals Refining Zambia           | ZAMBIA                   | CID002854 |
| Gold     | Valcambi S.A.                                       | SWITZERLAND              | CID002003 |
| Gold     | Western Australian Mint (T/a The Perth Mint)        | AUSTRALIA                | CID002030 |
| Gold     | WIELAND Edelmetalle GmbH                            | GERMANY                  | CID002778 |
| Gold     | Yamakin Co., Ltd.                                   | JAPAN                    | CID002100 |
| Gold     | Yokohama Metal Co., Ltd.                            | JAPAN                    | CID002129 |
| Gold     | Yunnan Copper Industry Co., Ltd.                    | CHINA                    | CID000197 |
| Gold     | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | CHINA                    | CID002224 |
| Tantalum | Asaka Riken Co., Ltd.                               | JAPAN                    | CID000092 |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd.           | CHINA                    | CID000211 |
| Tantalum | D Block Metals, LLC                                 | UNITED STATES OF AMERICA | CID002504 |
| Tantalum | Exotech Inc.  | UNITED STATES OF AMERICA | CID000456 |
| Tantalum | F&X Electro-Materials Ltd.                          | CHINA                    | CID000460 |
| Tantalum | FIR Metals & Resource Ltd.                          | CHINA                    | CID002505 |
| Tantalum | Global Advanced Metals Aizu                         | JAPAN                    | CID002558 |
| Tantalum | Global Advanced Metals Boyertown                    | UNITED STATES OF AMERICA | CID002557 |
| Tantalum | Guangdong Rising Rare Metals-EO Materials Ltd.      | CHINA                    | CID000291 |
| Tantalum | Guangdong Zhiyuan New Material Co., Ltd.            | CHINA                    | CID000616 |
| Tantalum | H.C. Starck Co., Ltd.                               | THAILAND                 | CID002544 |
| Tantalum | H.C. Starck Hermsdorf GmbH                          | GERMANY                  | CID002547 |
| Tantalum | H.C. Starck Inc.                                    | UNITED STATES OF AMERICA | CID002548 |
| Tantalum | H.C. Starck Ltd.                                    | JAPAN                    | CID002549 |
| Tantalum | H.C. Starck Smelting GmbH & Co. KG                  | GERMANY                  | CID002550 |
| Tantalum | H.C. Starck Tantalum and Niobium GmbH               | GERMANY                  | CID002545 |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd.   | CHINA                    | CID002492 |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd.        | CHINA                    | CID002512 |
| Tantalum | Jiangxi Tuohong New Raw Material                    | CHINA                    | CID002842 |

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|----------|---|--|-----------|
| Tantalum | Jiujiang Janny New Material Co., Ltd.   | CHINA                                      | CID003191 |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd.   | CHINA                                      | CID000914 |
| Tantalum | Jiujiang Tanbre Co., Ltd.   | CHINA                                      | CID000917 |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd.   | CHINA                                      | CID002506 |
| Tantalum | KEMET Blue Metals   | MEXICO                                     | CID002539 |
| Tantalum | KEMET Blue Powder   | UNITED STATES OF AMERICA                   | CID002568 |
| Tantalum | LSM Brasil S.A.   | BRAZIL                                     | CID001076 |
| Tantalum | Metallurgical Products India Pvt., Ltd.   | INDIA                                      | CID001163 |
| Tantalum | Mineracao Taboca S.A.   | BRAZIL                                     | CID001175 |
| Tantalum | Mitsui Mining and Smelting Co., Ltd.  | JAPAN                                      | CID001192 |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd.  | CHINA                                      | CID001277 |
| Tantalum | NPM Silmet AS   | ESTONIA                                    | CID001200 |
| Tantalum | Power Resources Ltd.  | MACEDONIA, THE FORMER YUGOSLAV REPUBLIC OF | CID002847 |
| Tantalum | QuantumClean  | UNITED STATES OF AMERICA                   | CID001508 |
| Tantalum | Resind Industria e Comercio Ltda.   | BRAZIL                                     | CID002707 |
| Tantalum | RFH Tantalum Smeltery Co., Ltd./Yanling Jincheng Tantalum & Niobium Co., Ltd.         | CHINA                                      | CID001522 |
| Tantalum | Solikamsk Magnesium Works OAO   | RUSSIAN FEDERATION                         | CID001769 |
| Tantalum | Taki Chemical Co., Ltd.   | JAPAN                                      | CID001869 |
| Tantalum | Telex Metals  | UNITED STATES OF AMERICA                   | CID001891 |
| Tantalum | Ulba Metallurgical Plant JSC  | KAZAKHSTAN                                 | CID001969 |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd.   | CHINA                                      | CID002508 |
| Tin      | Alpha   | UNITED STATES OF AMERICA                   | CID000292 |
| Tin      | An Vinh Joint Stock Mineral Processing Company  | VIET NAM                                   | CID002703 |
| Tin      | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.                                     | CHINA                                      | CID000228 |
| Tin      | Chifeng Dajingzi Tin Industry Co., Ltd.   | CHINA                                      | CID003190 |
| Tin      | China Tin Group Co., Ltd.   | CHINA                                      | CID001070 |
| Tin      | CNMC (Guangxi) PGMA Co., Ltd.   | CHINA                                      | CID000278 |
| Tin      | CV Ayi Jaya   | INDONESIA                                  | CID002570 |
| Tin      | CV Dua Sekawan  | INDONESIA                                  | CID002592 |
| Tin      | CV Gita Pesona  | INDONESIA                                  | CID000306 |
| Tin      | CV United Smelting  | INDONESIA                                  | CID000315 |
| Tin      | CV Venus Inti Perkasa   | INDONESIA                                  | CID002455 |
| Tin      | Dowa  | JAPAN                                      | CID000402 |
| Tin      | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | VIET NAM                                   | CID002572 |
| Tin      | EM Vinto  | BOLIVIA (PLURINATIONAL STATE OF)           | CID000438 |
| Tin      | Estanho de Rondonia S.A.  | BRAZIL                                     | CID000448 |
| Tin      | Fenix Metals  | POLAND                                     | CID000468 |
| Tin      | Gejiu Fengming Metallurgy Chemical Plant  | CHINA                                      | CID002848 |
| Tin      | Gejiu Jinye Mineral Company   | CHINA                                      | CID002859 |
| Tin      | Gejiu Kai Meng Industry and Trade LLC   | CHINA                                      | CID000942 |

|     |  |                                  |           |
|-----|--|----------------------------------|-----------|
| Tin | Gejiu Non-Ferrous Metal Processing Co., Ltd.     | CHINA                            | CID000538 |
| Tin | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.   | CHINA                            | CID001908 |
| Tin | Gejiu Zili Mining And Metallurgy Co., Ltd.       | CHINA                            | CID000555 |
| Tin | Guangdong Hanhe Non-Ferrous Metal Co., Ltd.      | CHINA                            | CID003116 |
| Tin | Guanyang Guida Nonferrous Metal Smelting Plant   | CHINA                            | CID002849 |
| Tin | HuiChang Hill Tin Industry Co., Ltd.             | CHINA                            | CID002844 |
| Tin | Huichang Jinshunda Tin Co., Ltd.                 | CHINA                            | CID000760 |
| Tin | Jiangxi Ketai Advanced Material Co., Ltd.        | CHINA                            | CID000244 |
| Tin | Jiangxi New Nanshan Technology Ltd.              | CHINA                            | CID001231 |
| Tin | Magnu's Minerai's Metais e Ligas Ltda.           | BRAZIL                           | CID002468 |
| Tin | Malaysia Smelting Corporation (MSC)              | MALAYSIA                         | CID001105 |
| Tin | Melt Metais e Ligas S.A.                         | BRAZIL                           | CID002500 |
| Tin | Metallic Resources, Inc.                         | UNITED STATES OF AMERICA         | CID001142 |
| Tin | Metallo Belgium N.V.                             | BELGIUM                          | CID002773 |
| Tin | Metallo Spain S.L.U.                             | SPAIN                            | CID002774 |
| Tin | Mineracao Taboca S.A.                            | BRAZIL                           | CID001173 |
| Tin | Minsur   | PERU                             | CID001182 |
| Tin | Mitsubishi Materials Corporation                 | JAPAN                            | CID001191 |
| Tin | Modeltech Sdn Bhd                                | MALAYSIA                         | CID002858 |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company | VIET NAM                         | CID002573 |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd.          | THAILAND                         | CID001314 |
| Tin | O.M. Manufacturing Philippines, Inc.             | PHILIPPINES                      | CID002517 |
| Tin | Operaciones Metalurgical S.A.                    | BOLIVIA (PLURINATIONAL STATE OF) | CID001337 |
| Tin | Pongpipat Company Limited                        | MYANMAR                          | CID003208 |
| Tin | PT Aries Kencana Sejahtera                       | INDONESIA                        | CID000309 |
| Tin | PT Artha Cipta Langgeng                          | INDONESIA                        | CID001399 |
| Tin | PT ATD Makmur Mandiri Jaya                       | INDONESIA                        | CID002503 |
| Tin | PT Babel Inti Perkasa                            | INDONESIA                        | CID001402 |
| Tin | PT Babel Surya Alam Lestari                      | INDONESIA                        | CID001406 |
| Tin | PT Bangka Prima Tin                              | INDONESIA                        | CID002776 |
| Tin | PT Bangka Serumpun                               | INDONESIA                        | CID003205 |
| Tin | PT Bangka Tin Industry                           | INDONESIA                        | CID001419 |
| Tin | PT Belitung Industri Sejahtera                   | INDONESIA                        | CID001421 |
| Tin | PT Bukit Timah                                   | INDONESIA                        | CID001428 |
| Tin | PT DS Jaya Abadi                                 | INDONESIA                        | CID001434 |
| Tin | PT Eunindo Usaha Mandiri                         | INDONESIA                        | CID001438 |
| Tin | PT Inti Stania Prima                             | INDONESIA                        | CID002530 |
| Tin | PT Karimun Mining                                | INDONESIA                        | CID001448 |
| Tin | PT Kijang Jaya Mandiri                           | INDONESIA                        | CID002829 |
| Tin | PT Lautan Harmonis Sejahtera                     | INDONESIA                        | CID002870 |

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|----------|--|---------------------------|-----------|
| Tin      | PT Menara Cipta Mulia                              | INDONESIA                 | CID002835 |
| Tin      | PT Mitra Stania Prima                              | INDONESIA                 | CID001453 |
| Tin      | PT Panca Mega Persada                              | INDONESIA                 | CID001457 |
| Tin      | PT Premium Tin Indonesia                           | INDONESIA                 | CID000313 |
| Tin      | PT Prima Timah Utama                               | INDONESIA                 | CID001458 |
| Tin      | PT Rajehan Ariq                                    | INDONESIA                 | CID002593 |
| Tin      | PT Refined Bangka Tin                              | INDONESIA                 | CID001460 |
| Tin      | PT Sariwiguna Binasentosa                          | INDONESIA                 | CID001463 |
| Tin      | PT Stanindo Inti Perkasa                           | INDONESIA                 | CID001468 |
| Tin      | PT Sukses Inti Makmur                              | INDONESIA                 | CID002816 |
| Tin      | PT Sumber Jaya Indah                               | INDONESIA                 | CID001471 |
| Tin      | PT Timah (Persero) Tbk Kunder                      | INDONESIA                 | CID001477 |
| Tin      | PT Timah (Persero) Tbk Mentok                      | INDONESIA                 | CID001482 |
| Tin      | PT Tinindo Inter Nusa                              | INDONESIA                 | CID001490 |
| Tin      | PT Tommy Utama                                     | INDONESIA                 | CID001493 |
| Tin      | Resind Industria e Comercio Ltda.                  | BRAZIL                    | CID002706 |
| Tin      | Rui Da Hung  | TAIWAN, PROVINCE OF CHINA | CID001539 |
| Tin      | Soft Metais Ltda.                                  | BRAZIL                    | CID001758 |
| Tin      | Super Ligas  | BRAZIL                    | CID002756 |
| Tin      | Thaisarco  | THAILAND                  | CID001898 |
| Tin      | Tuyen Quang Non-Ferrous Metals Joint Stock Company | VIET NAM                  | CID002574 |
| Tin      | White Solder Metalurgia e Mineracao Ltda.          | BRAZIL                    | CID002036 |
| Tin      | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.      | CHINA                     | CID002158 |
| Tin      | Yunnan Tin Company Limited                         | CHINA                     | CID002180 |
| Tungsten | A.L.M.T. TUNGSTEN Corp.                            | JAPAN                     | CID000004 |
| Tungsten | ACL Metais Eireli                                  | BRAZIL                    | CID002833 |
| Tungsten | Asia Tungsten Products Vietnam Ltd.                | VIET NAM                  | CID002502 |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd.       | CHINA                     | CID002513 |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd.               | CHINA                     | CID000258 |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd.                   | CHINA                     | CID000499 |
| Tungsten | Ganzhou Haichuang Tungsten Co., Ltd.               | CHINA                     | CID002645 |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd.        | CHINA                     | CID000875 |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd.            | CHINA                     | CID002315 |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd.                 | CHINA                     | CID002494 |
| Tungsten | Ganzhou Yatai Tungsten Co., Ltd.                   | CHINA                     | CID002536 |
| Tungsten | Global Tungsten & Powders Corp.                    | UNITED STATES OF AMERICA  | CID000568 |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd.               | CHINA                     | CID000218 |
| Tungsten | H.C. Starck Smelting GmbH & Co. KG                 | GERMANY                   | CID002542 |
| Tungsten | H.C. Starck Tungsten GmbH                          | GERMANY                   | CID002541 |
| Tungsten | Hunan Chenzhou Mining Co., Ltd.                    | CHINA                     | CID000766 |

|          |   |                          |           |
|----------|---|--------------------------|-----------|
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji               | CHINA                    | CID002579 |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd.                   | CHINA                    | CID000769 |
| Tungsten | Hunan Litian Tungsten Industry Co., Ltd.                      | CHINA                    | CID003182 |
| Tungsten | Hydrometallurg, JSC   | RUSSIAN FEDERATION       | CID002649 |
| Tungsten | Japan New Metals Co., Ltd.                                    | JAPAN                    | CID000825 |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd.               | CHINA                    | CID002551 |
| Tungsten | Jiangxi Dayu Longxintai Tungsten Co., Ltd.                    | CHINA                    | CID002647 |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd.                            | CHINA                    | CID002321 |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.         | CHINA                    | CID002313 |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | CHINA                    | CID002318 |
| Tungsten | Jiangxi Xincheng Tungsten Industry Co., Ltd.                  | CHINA                    | CID002317 |
| Tungsten | Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd.          | CHINA                    | CID002535 |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd.                           | CHINA                    | CID002316 |
| Tungsten | Kennametal Fallon   | UNITED STATES OF AMERICA | CID000966 |
| Tungsten | Kennametal Huntsville   | UNITED STATES OF AMERICA | CID000105 |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd.                               | CHINA                    | CID002319 |
| Tungsten | Moliren Ltd.  | RUSSIAN FEDERATION       | CID002845 |
| Tungsten | Niagara Refining LLC  | UNITED STATES OF AMERICA | CID002589 |
| Tungsten | Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC     | VIET NAM                 | CID002543 |
| Tungsten | Philippine Chuangxin Industrial Co., Inc.                     | PHILIPPINES              | CID002827 |
| Tungsten | South-East Nonferrous Metal Company Limited of Hengyang City  | CHINA                    | CID002815 |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd.                           | VIET NAM                 | CID001889 |
| Tungsten | Unecha Refractory metals plant                                | RUSSIAN FEDERATION       | CID002724 |
| Tungsten | Vietnam Youngsun Tungsten Industry Co., Ltd.                  | VIET NAM                 | CID002011 |
| Tungsten | Wolfram Bergbau und Hutten AG                                 | AUSTRIA                  | CID002044 |
| Tungsten | Woltech Korea Co., Ltd.                                       | KOREA, REPUBLIC OF       | CID002843 |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd.                              | CHINA                    | CID002320 |
| Tungsten | Xiamen Tungsten Co., Ltd.                                     | CHINA                    | CID002082 |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.   | CHINA                    | CID002830 |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd.                     | CHINA                    | CID002095 |

#### V. Future Due Diligence

We will continue to communicate our expectations and information requirements to our direct suppliers. Over time, we anticipate that the amount of information available globally on the traceability and sourcing of these ores will increase and improve our knowledge. We will continue to make inquiries to our direct suppliers and undertake additional risk assessments when potentially relevant changes in facts or circumstances are identified. If we become aware of a supplier whose due diligence needs improvement, we may continue the trade relationship while that supplier improves its compliance program. We expect our suppliers to take similar measures with their suppliers to ensure alignment throughout the supply chain.

In addition to those above, the Company will undertake the following steps during the next compliance period:

Review the conflict minerals policy statement and update if necessary.

Continue to collect responses from suppliers using the most recent revision of the CMRT.

Engage with suppliers that did not provide a response in 2017 or provided incomplete responses to enhance our data collection for 2018.

Monitor and track performance of risk mitigation efforts.

Engage with smelters by sending letters to those that have not been audited as conformant.

Send messages to our suppliers to engage with these smelters.

Compare and validate RCOI results to information collected via independent third-party audit programs, such as the RMI.

Encourage responsible sourcing from the DRC and adjoining countries.

<sup>1</sup> The term "conflict mineral" is defined in Section 1502(e)(4) of the Dodd-Frank Wall Street Reform and Consumer Protection Act as (A) columbite-tantalite, also known as coltan (the metal ore from which tantalum is extracted); cassiterite (the metal ore from which tin is extracted); gold; wolframite (the metal ore from which tungsten is extracted); or their derivatives; or (B) any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo ("DRC") or an adjoining country.

<sup>2</sup>OECD (2016), OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition, OECD Publishing, Paris. <http://dx.doi.org/10.1787/9789264252479-en>

**APPENDIX I**  
**Countries of Origin**

The information provided in this Appendix is based on the information collected from the Company's suppliers.

|                                   |  |
|-----------------------------------|--|
| Argentina                         | Laos   |
| Australia                         | Madagascar   |
| Austria                           | Malaysia   |
| Benin                             | Mali   |
| Bolivia (Plurinational State of)  | Mexico   |
| Brazil                            | Mongolia   |
| Burkina Faso                      | Mozambique   |
| Cambodia                          | Myanmar  |
| Canada                            | Namibia  |
| Chile                             | Nicaragua  |
| China                             | Nigeria  |
| Colombia                          | Panama   |
| Congo, Democratic Republic of the | Peru   |
| Ecuador                           | Portugal   |
| Eritrea                           | Russian Federation                                   |
| Ethiopia                          | Rwanda   |
| France                            | Senegal  |
| Germany                           | Sierra Leone   |
| Ghana                             | South Africa   |
| Guatemala                         | Spain  |
| Guinea                            | Thailand   |
| Guyana                            | Togo   |
| Honduras                          | Uganda   |
| India                             | United Kingdom of Great Britain and Northern Ireland |
| Indonesia                         | United States of America                             |
| Japan                             | Uzbekistan   |
| Kazakhstan                        | Viet Nam   |
|                                   | Zimbabwe   |