



Public Disclosure of Due Diligence Processes for Conflict Minerals (3TG) and Cobalt in Products

This Minerals Report for Dell Technologies covers the reporting year January 1, 2024 through December 31, 2024 and satisfies EPEAT Criterion 7.3.1 Public Disclosure of Due Diligence Processes for Conflict Minerals (3TG) in Products, 7.3.2 Public Disclosure of Due Diligence Processes for Cobalt in Products, 7.3.3 Sourcing 3TG Minerals from Responsible Smelters / Refiners Validated by Approved Programs, and 7.3.4 Sourcing 3TG and Cobalt Minerals from Responsible Smelters/Refiners Validated by Approved Programs.

Dell Products Covered by this Report

This report relates to products: (i) for which conflict minerals and/or cobalt are necessary to the functionality or production of such products; (ii) that were manufactured, or contracted to be manufactured, by Dell; and (iii) for which the manufacture was completed during the Reporting Period (the "Covered Products"). The Covered Products include the following product categories manufactured or contracted to be manufactured by Dell in the Reporting Period: branded hardware, such as desktop PCs, notebooks and tablets; branded and third-party peripherals, such as monitors and projectors; and server, storage, and networking products.

Overview of Dell's Conflict Minerals Program

Dell supports and respects the internationally recognized human rights of all people, including the employees and workers within our supply chain.

Dell manufactures and contracts to manufacture products for which 3TG minerals and cobalt are necessary to their functionality or production. As a manufacturer of technology products, Dell does not purchase 3TG or cobalt directly from mines, smelters, or refiners, but does procure from suppliers components and materials that may contain 3TG or cobalt.

Dell collaborates with its suppliers, industry peers, and other stakeholders to ensure our products do not contain 3TG or cobalt whose sale directly or indirectly finances armed conflict or contributes to human rights violations. Dell conducts a good-faith Reasonable Country of Origin Inquiry ("RCOI") to determine whether any necessary 3TG or cobalt contained in the Covered Products originated in the Democratic Republic of the Congo (the "DRC"), the Republic of the Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia, or Angola (together, the "Covered Countries"), or were from recycled or scrap sources.

Dell's due diligence measures for 3TG and cobalt conforms in all applicable respects to the framework outlined in the Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including Annex I, II, III and the related supplements pertaining to downstream companies (OECD framework).

We participate in multi-stakeholder initiatives such as the Responsible Minerals Initiative (“RMI”). RMI provides tools such as the Conflict Minerals Reporting Template (“CMRT”) and the Emerging Minerals Reporting Template (“EMRT”) and oversees the Responsible Minerals Assurance Process (“RMAP”), which is one of three independently approved third-party audit schemes that verify that sourcing practices of actors at identified points in the supply chain (i.e., smelters or refiners (“SORs”)) are aligned to the OECD framework. We use these tools, RMI guidance, and the OECD framework to conduct due diligence on our 3TG and cobalt supply chain and drive our minerals sourcing actions towards the goals established at the beginning of the Reporting Period.

Reasonable Country of Origin Inquiry

Deploying a CMRT survey to relevant suppliers, conducting a smelter and refiner review, and considering other third-party data constituted the Reasonable Country of Origin Inquiry (“RCOI”). This RCOI, combined with our risk assessment and mitigation efforts described in this report, represents Dell’s efforts to trace the source of 3TG and cobalt in our supply chain to country of origin and the mine or location of origin as necessary. Based on the RCOI findings, Dell performed further due diligence on 3TG and cobalt contained in Covered Products that may originate from SORs that may, or that are known to, source from Covered Countries. The results of the RCOI investigation are reported under “Due Diligence Results.”

Design of Due Diligence Measures

Dell’s due diligence measures have been designed to conform, in all material respects, with the OECD framework.

Dell’s due diligence included the following elements of the OECD framework:

- Step 1:** Establish strong company management system
- 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 audits of supply chain due diligence at identified points in the supply chain
- Step 5:** Report on supply chain due diligence

Due Diligence Performed

Step 1: Establish Strong Company Management System

Dell has established a management system to determine the source and chain of custody of 3TG and cobalt in its supply chain.

Responsible Sourcing Policies. Dell abides by, and is held accountable to, the Responsible Business Alliance (“RBA”) Code of Conduct and Dell’s Supplier Principles, which require direct material suppliers to comply with Dell’s Responsible Sourcing Policy, maintain a conflict minerals policy, and conduct due diligence on the source and chain of custody of materials in

their products to reasonably assure they do not come from conflict sources. Dell's Human Rights Policy explicitly prohibits forced labor, child labor, and other serious human rights violations across the supply chain, which includes the minerals supply chain, in alignment with the OECD Annex II Model Supply Chain Policy.

Control System. Dell surveys its supply chain annually using the CMRT and EMRT. These surveys are the primary mechanism for identifying smelters and refiners that supply 3TG or cobalt to components within Dell's supply chain and assessing the risk that 3TG or cobalt is sourced from a Covered Country. Following the collection of smelter and refiner data from suppliers, Dell uses RMI's RMAP (and, as applicable, the London Bullion Market Association's ("LBMA") or Responsible Jewellery Council ("RJC") equivalent schemes) to determine whether each smelter and refiner identified through the CMRT is participating in a third-party audit program and to determine the country of origin of 3TG and cobalt used by the smelters and refiners in our supply chain.

Supplier Engagement. Responsible sourcing is embedded in Dell's supply chain management business processes. In addition to reviewing each CMRT and EMRT received for completeness and communicating and confirming compliance with any required corrective actions, we incorporate metrics on suppliers' adherence to Dell's expectations in scorecards used in quarterly business reviews. These metrics are communicated to suppliers alongside other measures of supply chain performance (e.g., quality, cost, and availability).

Internal Team. Dell has a team of individuals dedicated to responsible sourcing management who report to the Director for Social and Environmental Responsibility. These individuals work closely with other supply chain teams, such as the relevant Dell procurement and engineering teams, to collect data from suppliers – and work with them in the event of errors or non-compliance. Performance is regularly communicated to those aforementioned teams via monthly reports and escalation protocols.

Alignment and approval of policies, supplier requirements, communications and risk management are addressed in Assurance Working Council meetings, comprised of the supply chain leadership team.

Grievance Mechanism. Dell uses a reporting tool that allows any internal or external parties, including those within our supply chain, to confidentially report ethics concerns or suspected misconduct. The reporting tool is accessible 24/7, available in multiple languages and offers the option of anonymous reporting. Dell also encourages the use of RMI's Grievance Mechanism for mineral supply chain issues. Anonymous submissions can be made at <https://www.responsiblemineralsinitiative.org/minerals-due-diligence-container/risk-management/rmi-grievance-mechanism/>.

Dell does not retaliate against anyone who provides information or otherwise assists in an investigation or proceeding regarding any conduct the person reasonably believes constitutes a violation of applicable laws, regulations, or Dell policies.

Step 2: Identify and Assess Risks in the Supply Chain

A supplier is identified in-scope for Dell's Conflict Minerals Program if it meets one or more of the following criteria:

- supplies components to Dell that are known to, or could potentially, contain 3TG and/or cobalt;
- collects a specified percentage of Dell spend; or
- is considered high-risk for manufacturing products that contain 3TG and/or cobalt whose sale might benefit armed groups in the Covered Countries based on previously reported data.

Dell requests CMRTs and/or EMRTs from in-scope suppliers and expects them to disseminate this reporting requirement across the supply chain through a cascade approach. Suppliers are required to provide comprehensive, accurate data on 3TG and cobalt acquired from their supply chain through the CMRT/EMRT process. This data serves to identify and verify the smelters and refiners in our supply chain participating in RMAP (or, as applicable, the LBMA's or RJC's equivalent audit schemes). Collected CMRTs and EMRTs are analyzed to ensure conformity with Dell's policies and assessment.

Dell partners with a third-party software provider to manage the CMRT and EMRT reporting campaigns and confirm initial data validation (to ensure survey completeness), followed by a more in-depth review using internally developed risk assessment criteria. These criteria evaluate the smelters and refiners identified as being in Dell's supply chain and assess the supplier's due diligence undertaken and other aspects of the supplier's program (including existence of a conflict minerals policy, use of CMRT/EMRT).

Step 3: Design and Implement a Strategy to Respond to Identified Risks

Dell is committed to promoting responsible sourcing through third-party verification of smelters and refiners. Suppliers are expected to use smelters and refiners designated to be conformant by RMAP or equivalent certifications, or who use 3TG minerals or cobalt 100% from recycled or scrap sources.

Accordingly, Dell's due diligence draws on RMI databases, customer engagements, and independent research to identify non-certified smelters and refiners or those at risk of benefitting armed groups in conflict-affected and high-risk areas, including the Covered Countries. In such events, Dell requires suppliers to remove the smelter or refiner in question from their supply chain. Dell provides training and resources to suppliers to aid them in these efforts.

This approach is enhanced by reviewing not only high-risk smelters and refiners, but also those that do not, or cannot, achieve third-party audit conformance. The relevant Dell procurement teams help engage suppliers to develop a plan to address smelters or refiners of concern, including identifying parts affected, material breakdown of parts, and timelines for completion. Progress is managed with executive oversight on both sides, with regular briefings leading to potentially impacted scoring in quarterly business reviews. If the issue is not resolved, alternative sourcing will be pursued.

To expedite such processes, there is a focus on ensuring that data collection targets parts and sub-tier suppliers directly in the supply chain for Dell products. We continue to review opportunities to improve surveying and reporting capabilities, with supplier collaboration of paramount importance to this process.

Step 4: Carry Out Independent Third-Party Audits of Supply Chain Due Diligence at Identified Points in the Supply Chain

As a downstream company, Dell uses RMAP (or, as applicable, the LBMA's or RJC's equivalent audit schemes) for smelter and refiner audits to assess risks from the mine to the smelter or refiner. Dell requires that suppliers use smelters that participate in such audits, or the supplier will be required to remove the non-compliant smelter from Dell's supply chain. Participation in independent, third-party certification programs provides assurance that smelters and refiners have enough systems and controls in place to ensure their sourcing practices align with the OECD Guidance and do not support conflict in the DRC or adjacent countries. Through our membership and participation in RMI, we continue to support the development and implementation of tools and processes aimed at advancing cross-industry due diligence practices.

Step 5: Report on Supply Chain Due Diligence

Dell provides information related to social and environmental responsibility on our website and in its annual SEC filing.

Due Diligence Results

100% of in-scope suppliers identified within Dell's 3TG supply chain during the Reporting Period provided a CMRT in response to our survey request. Based on the responses, 229 unique 3TG smelter or refiner facilities were identified. Our work to increase the number of smelters and refiners participating in approved third-party audits resulted in the designation of 223 smelters and refiners (97%) reported in Dell's supply chain as conformant¹ as of Dec 31, 2024. The remaining smelters and refiners are considered by Dell to be non-compliant either because they recently stopped participating in a third-party audit or were not willing to complete a third-party audit within established timelines. We are collaborating with our suppliers to transition away from the remaining non-compliant entities according to the risk mitigation strategy previously noted.

100% of in-scope suppliers identified within Dell's cobalt supply chain during the Reporting Period provided an EMRT in response to our survey request. Based on the responses, 73 unique cobalt smelter or refiner facilities were identified, listed below.

¹ In addition to smelters and refiners that are designated by RMAP as "Active" and/or "Conformant", Dell includes smelters and refiners with equivalent assurance (that is, London Bullion Market Association ("LBMA") Good Delivery List or Responsible Jewellery Council ("RJC") Member Register). RMAP assurance is not required for 3TG sourced from recycled sources, as per policy.

As a result of our due diligence, Dell found no reason to conclude that any smelter or refiner reported in Dell's supply chain sourced 3TG or cobalt that directly or indirectly financed or benefited armed groups in the Covered Countries.

Many suppliers returned CMRTs and EMRTs encompassing their entire supply chains, rather than focusing only on smelters or refiners who supplied 3TG or cobalt used in materials or components incorporated into Dell's Covered Products; therefore, some smelters and refiners reported might not be providing material for Dell products. Dell continues to work with suppliers throughout its supply chain to assess and improve their information, reporting quality, and capacity, considering supply chain fluctuations and other changes in status or scope and relationships over time.

Continuous Improvement to Mitigate Risk

Dell will continue taking the following steps, among others, to improve the due diligence conducted and to further mitigate the risk of sourcing 3TG or cobalt that benefits armed groups from the Covered Countries:

- 1) Work closely with suppliers to obtain necessary information on the origin of 3TG or cobalt contained in materials or components used in the Covered Products.
- 2) Work with supply chain actors through engagement with RMI to promote smelter and refiner participation in RMAP and other equivalent third-party certifications.
- 3) Monitor incidents related to OECD Annex II risks to assess their impact on Dell's supply chain.
- 4) Partner with organizations dedicated to supporting mining communities and contributing to ethical materials sourcing.

Cautionary Statement about Forward-Looking Statements

Statements in this report that relate to future events are forward-looking statements within the meaning of Section 21E of the Securities Exchange Act of 1934 and Section 27A of the Securities Act of 1933 and are based on Dell's current expectations. In some cases, you can identify these statements by such forward-looking words as "anticipate," "believe," "confidence," "could," "estimate," "expect," "guidance," "intend," "may," "objective," "outlook," "plan," "project," "possible," "potential," "should," "will" and "would," or similar words or expressions that refer to future events or outcomes. Dell's results or events in future periods could differ materially from those expressed or implied by these forward-looking statements because of risks, uncertainties, and other factors, including those risks described in its reports filed with the SEC, including Dell's Annual Report on Form 10-K for the fiscal year ended January 31, 2025, quarterly reports on Form 10-Q, and current reports on Form 8-K. These filings are available for review through the SEC's website at www.sec.gov. Any or all forward-looking statements Dell makes may turn out to be wrong and can be affected by inaccurate assumptions Dell might make or by known or unknown risks, uncertainties, and other factors, including those identified in this report. Accordingly, you should not place undue reliance on the forward-looking statements made in this report, which speak only as of its date. Dell does not undertake to update, and expressly disclaims any duty to update, its forward-looking statements, whether as a result of circumstances or events that arise after the date they are made, new information, or otherwise.

Reasonable Country of Origin Inquiry Lists for 3TG and Cobalt

The following list identifies countries from which 3TG or cobalt in Dell's products may have originated based on sourcing information disclosed during the third-party audit processes and RMI's Reasonable Country of Origin Inquiry report dated January 31, 2025.

The countries of origin of the 3TG processed are believed to be the following:

Andorra	Germany	Singapore
Australia	India	South Africa
Austria	Indonesia	Spain
Belgium	Italy	Sweden
Bolivia	Japan	Switzerland
Brazil	Kazakhstan	Taiwan, Providence of China
Canada	Korea, Republic of	Tanzania, United Republic of
Chile	Malaysia	Thailand
China	Mexico	Turkey
Colombia	Netherlands	Uganda
Congo, Democratic Republic of the	Peru	United Arab Emirates
Czechia	Philippines	United States of America
Estonia	Poland	Uzbekistan
France	Rwanda	Vietnam

The countries of origin of the cobalt processed are believed to be the following:

Australia	Madagascar
Belgium	Morocco
Canada	Norway
China	Philippines
Congo, Democratic Republic of the	South Africa
Finland	Taiwan, Providence of China
France	Thailand
Indonesia	Turkey
Japan	United Kingdom of Great Britain and Northern Ireland
Korea, Republic of	

Dell's CY24 3TG Smelters or Refiners

Metal	Smelter Name	Country	Status
Gold	GG Refinery Ltd.	TANZANIA, UNITED REPUBLIC OF	Conformant (RMAP)
Gold	Coimpa Industrial LTDA	BRAZIL	Conformant (RMAP)
Gold	Abington Reldan Metals, LLC	UNITED STATES OF AMERICA	Conformant (RMAP)
Gold	Dowa	JAPAN	Conformant (RMAP)
Gold	United Precious Metal Refining, Inc.	UNITED STATES OF AMERICA	Conformant (RMAP)
Gold	Gold by Gold Colombia	COLOMBIA	Conformant (RMAP)
Gold	WEEEREFINING	FRANCE	Conformant (RMAP)
Gold	KGHM Polska Miedz Spolka Akcyjna	POLAND	Conformant (RMAP) (LBMA)
Gold	Metal Concentrators SA (Pty) Ltd.	SOUTH AFRICA	Conformant (RMAP) (RJC)
Gold	Royal Canadian Mint	CANADA	Conformant (RMAP) (LBMA)
Gold	Rand Refinery (Pty) Ltd.	SOUTH AFRICA	Conformant (RMAP) (LBMA)
Gold	PX Precinox S.A.	SWITZERLAND	Conformant (RMAP) (LBMA)
Gold	PT Aneka Tambang (Persero) Tbk	INDONESIA	Conformant (RMAP) (LBMA)
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CHINA	Conformant (RMAP) (LBMA)
Gold	SEMPSA Joyeria Plateria S.A.	SPAIN	Conformant (RMAP) (RJC)
Gold	MKS PAMP SA	SWITZERLAND	Conformant (RMAP) (LBMA)
Gold	TOO Tau-Ken-Altyn	KAZAKHSTAN	Conformant (RMAP) (LBMA)
Gold	Ohura Precious Metal Industry Co., Ltd.	JAPAN	Conformant (RMAP)
Gold	Nihon Material Co., Ltd.	JAPAN	Conformant (RMAP) (LBMA)

Gold	Navoi Mining and Metallurgical Combinat	UZBEKISTAN	Conformant (RMAP) (LBMA)
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	TURKEY	Conformant (RMAP) (LBMA)
Gold	REMONDIS PMR B.V.	NETHERLANDS	Conformant (RMAP)
Gold	T.C.A S.p.A	ITALY	Conformant (RMAP) (LBMA)
Gold	Eco-System Recycling Co., Ltd. East Plant	JAPAN	Conformant (RMAP)
Gold	Sichuan Tianze Precious Metals Co., Ltd.	CHINA	Conformant (RMAP) (LBMA)
Gold	Asahi Refining Canada Ltd.	CANADA	Conformant (RMAP) (LBMA)
Gold	Umicore S.A. Business Unit Precious Metals Refining	BELGIUM	Conformant (RMAP) (LBMA)
Gold	Torecom	KOREA, REPUBLIC OF	Conformant (RMAP)
Gold	Tokuriki Honten Co., Ltd.	JAPAN	Conformant (RMAP) (LBMA)
Gold	Chugai Mining	JAPAN	Conformant (RMAP)
Gold	Chimet S.p.A.	ITALY	Conformant (RMAP) (LBMA)
Gold	CCR Refinery - Glencore Canada Corporation	CANADA	Conformant (RMAP) (LBMA)
Gold	Sumitomo Metal Mining Co., Ltd.	JAPAN	Conformant (RMAP) (LBMA)
Gold	Solar Applied Materials Technology Corp.	TAIWAN, PROVINCE OF CHINA	Conformant (RMAP) (LBMA)
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES	Conformant (RMAP) (LBMA)
Gold	Aurubis AG	GERMANY	Conformant (RMAP) (LBMA)
Gold	ASAHI METALFINE, Inc.	JAPAN	Conformant (RMAP) (LBMA)
Gold	Mitsui Mining and Smelting Co., Ltd.	JAPAN	Conformant (RMAP)
Gold	Shandong Gold Smelting Co., Ltd.	CHINA	Conformant (RMAP) (LBMA)

Gold	Tanaka Kikinzoku Kogyo K.K.	JAPAN	Conformant (RMAP) (LBMA)
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN	Conformant (RMAP) (LBMA)
Gold	Agosi AG	GERMANY	Conformant (RMAP) (LBMA)
Gold	Aida Chemical Industries Co., Ltd.	JAPAN	Conformant (RMAP)
Gold	Mitsubishi Materials Corporation	JAPAN	Conformant (RMAP) (LBMA)
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	MEXICO	Conformant (RMAP) (LBMA)
Gold	Advanced Chemical Company	UNITED STATES OF AMERICA	Conformant (RMAP)
Gold	SAFINA A.S.	CZECHIA	Conformant (RMAP)
Gold	Yokohama Metal Co., Ltd.	JAPAN	Conformant (RMAP)
Gold	Yamakin Co., Ltd.	JAPAN	Conformant (RMAP)
Gold	Western Australian Mint (T/a The Perth Mint)	AUSTRALIA	Conformant (RMAP) (LBMA)
Gold	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	AUSTRIA	Conformant (RMAP)
Gold	Italpreziosi	ITALY	Conformant (RMAP) (RJC)
Gold	C. Hafner GmbH + Co. KG	GERMANY	Conformant (RMAP) (RJC)
Gold	Zijin Mining Group Gold Smelting Co. Ltd.	CHINA	Conformant (RMAP) (LBMA)
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA	Conformant (RMAP) (LBMA)
Gold	Boliden Ronnskar	SWEDEN	Conformant (RMAP) (LBMA)
Gold	Argor-Heraeus S.A.	SWITZERLAND	Conformant (RMAP) (RJC)
Gold	AngloGold Ashanti Corrego do Sitio Mineracao	BRAZIL	Conformant (RMAP) (LBMA)
Gold	Valcambi S.A.	SWITZERLAND	Conformant (RMAP) (LBMA) (RJC)

Gold	Metalor Technologies (Suzhou) Ltd.	CHINA	Conformant (RMAP) (RJC)
Gold	Heraeus Metals Hong Kong Ltd.	CHINA	Conformant (RMAP) (RJC)
Gold	Heimerle + Meule GmbH	GERMANY	Conformant (RMAP) (LBMA)
Gold	Metalor USA Refining Corporation	UNITED STATES OF AMERICA	Conformant (RMAP) (RJC)
Gold	Metalor Technologies S.A.	SWITZERLAND	Conformant (RMAP) (RJC)
Gold	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE	Conformant (RMAP) (RJC)
Gold	Materion	UNITED STATES OF AMERICA	Conformant (RMAP)
Gold	LS MnM Inc.	KOREA, REPUBLIC OF	Conformant (RMAP) (LBMA)
Gold	Metalor Technologies (Hong Kong) Ltd.	CHINA	Conformant (RMAP) (RJC)
Gold	Matsuda Sangyo Co., Ltd.	JAPAN	Conformant (RMAP) (LBMA)
Gold	Kojima Chemicals Co., Ltd.	JAPAN	Conformant (RMAP)
Gold	Kennecott Utah Copper LLC	UNITED STATES OF AMERICA	Conformant (RMAP)
Gold	Kazzinc	KAZAKHSTAN	Conformant (RMAP) (LBMA)
Gold	JX Advanced Metals Corporation	JAPAN	Conformant (RMAP) (LBMA)
Gold	Istanbul Gold Refinery	TURKEY	Conformant (RMAP) (LBMA)
Gold	Ishifuku Metal Industry Co., Ltd.	JAPAN	Conformant (RMAP) (LBMA)
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CHINA	Conformant (RMAP) (LBMA)
Gold	L'Orfebre S.A.	ANDORRA	Conformant (RMAP)
Gold	Asahi Refining USA Inc.	UNITED STATES OF AMERICA	Conformant (RMAP) (LBMA)

Gold	Jiangxi Copper Co., Ltd.	CHINA	Conformant (RMAP) (LBMA)
Gold	Japan Mint	JAPAN	Conformant (RMAP) (LBMA)
Gold	Heraeus Germany GmbH Co. KG	GERMANY	Conformant (RMAP)
Gold	LT Metal Ltd.	KOREA, REPUBLIC OF	Conformant (RMAP)
Gold	MMTC-PAMP India Pvt., Ltd.	INDIA	Conformant (RMAP) (LBMA)
Gold	SungEel HiMetal Co., Ltd.	KOREA, REPUBLIC OF	Conformant (RMAP)
Gold	Asaka Riken Co., Ltd.	JAPAN	Conformant (RMAP)
Gold	DSC (Do Sung Corporation)	KOREA, REPUBLIC OF	Conformant (RMAP)
Gold	WIELAND Edelmetalle GmbH	GERMANY	Conformant (RMAP)
Gold	Elite Industech Co., Ltd.	TAIWAN, PROVINCE OF CHINA	Conformant (RMAP)
Gold	Eco-System Recycling Co., Ltd. West Plant	JAPAN	Conformant (RMAP)
Gold	Eco-System Recycling Co., Ltd. North Plant	JAPAN	Conformant (RMAP)
Gold	Planta Recuperadora de Metales SpA	CHILE	Conformant (RMAP)
Gold	Korea Zinc Co., Ltd.	KOREA, REPUBLIC OF	Conformant (RMAP)
Gold	NH Recytech Company	KOREA, REPUBLIC OF	Conformant (RMAP)
Gold	Bangalore Refinery	INDIA	Active (RMAP)
Gold	Impala Platinum - Platinum Metals Refinery (PMR)	SOUTH AFRICA	Active (RMAP)
Gold	Al Etihad Gold Refinery DMCC	UNITED ARAB EMIRATES	Conformant (RJC)
Gold	Safimet S.p.A	ITALY	Conformant (RJC)
Gold	Samduck Precious Metals	KOREA, REPUBLIC OF	Non-conformant
Gold	Umicore Precious Metals Thailand	THAILAND	Non-conformant

Gold	Cendres + Metaux S.A.	SWITZERLAND	Conformant (RJC)
Gold	8853 S.p.A.	ITALY	Conformant (RJC)
Gold	SAAMP	FRANCE	Conformant (RJC)
Gold	Singway Technology Co., Ltd.	TAIWAN, PROVINCE OF CHINA	Non-conformant
Gold	Alexy Metals	UNITED STATES OF AMERICA	Non-conformant
Gold	Augmont Enterprises Private Limited	INDIA	Conformant (RJC)
Gold	GGC Gujrat Gold Centre Pvt. Ltd.	INDIA	Non-conformant
Tantalum	Global Advanced Metals Boyertown	UNITED STATES OF AMERICA	Conformant (RMAP)
Tantalum	Global Advanced Metals Aizu	JAPAN	Conformant (RMAP)
Tantalum	D Block Metals, LLC	UNITED STATES OF AMERICA	Conformant (RMAP)
Tantalum	PowerX Ltd.	RWANDA	Conformant (RMAP)
Tantalum	XIMEI RESOURCES (GUANGDONG) LIMITED	CHINA	Conformant (RMAP)
Tantalum	F&X Electro-Materials Ltd.	CHINA	Conformant (RMAP)
Tantalum	Jiujiang Tanbre Co., Ltd.	CHINA	Conformant (RMAP)
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINA	Conformant (RMAP)
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA	Conformant (RMAP)
Tantalum	Mitsui Mining and Smelting Co., Ltd.	JAPAN	Conformant (RMAP)
Tantalum	Guangdong Rising Rare Metals-EO Materials Ltd.	CHINA	Conformant (RMAP)

Tantalum	Ulba Metallurgical Plant JSC	KAZAKHSTAN	Conformant (RMAP)
Tantalum	Telex Metals	UNITED STATES OF AMERICA	Conformant (RMAP)
Tantalum	TANIOBIS GmbH	GERMANY	Conformant (RMAP)
Tantalum	TANIOBIS Co., Ltd.	THAILAND	Conformant (RMAP)
Tantalum	KEMET de Mexico	MEXICO	Conformant (RMAP)
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA	Conformant (RMAP)
Tantalum	TANIOBIS Smelting GmbH & Co. KG	GERMANY	Conformant (RMAP)
Tantalum	TANIOBIS Japan Co., Ltd.	JAPAN	Conformant (RMAP)
Tantalum	Jiangxi Tuohong New Raw Material	CHINA	Conformant (RMAP)
Tantalum	Materion Newton Inc.	UNITED STATES OF AMERICA	Conformant (RMAP)
Tantalum	Resind Industria e Comercio Ltda.	BRAZIL	Conformant (RMAP)
Tantalum	NPM Silmet AS	ESTONIA	Conformant (RMAP)
Tantalum	AMG Brasil	BRAZIL	Conformant (RMAP)
Tantalum	FIR Metals & Resource Ltd.	CHINA	Conformant (RMAP)
Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	CHINA	Conformant (RMAP)
Tantalum	QuantumClean	UNITED STATES OF AMERICA	Conformant (RMAP)
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	CHINA	Conformant (RMAP)
Tantalum	Taki Chemical Co., Ltd.	JAPAN	Conformant (RMAP)
Tantalum	RFH Yancheng Jinye New Material Technology Co., Ltd.	CHINA	Conformant (RMAP)

Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA	Conformant (RMAP)
Tantalum	Metallurgical Products India Pvt., Ltd.	INDIA	Conformant (RMAP)
Tantalum	Mineracao Taboca S.A.	BRAZIL	Conformant (RMAP)
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHINA	Conformant (RMAP)
Tin	Woodcross Smelting Company Limited	UGANDA	Conformant (RMAP)
Tin	Tin Smelting Branch of Yunnan Tin Co., Ltd.	CHINA	Conformant (RMAP)
Tin	Thaisarco	THAILAND	Conformant (RMAP)
Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA	Conformant (RMAP)
Tin	Aurubis Beerse	BELGIUM	Conformant (RMAP)
Tin	Fenix Metals	POLAND	Conformant (RMAP)
Tin	Alpha Assembly Solutions Inc	UNITED STATES OF AMERICA	Conformant (RMAP)
Tin	Luna Smelter, Ltd.	RWANDA	Conformant (RMAP)
Tin	Malaysia Smelting Corporation Berhad (Port Klang)	MALAYSIA	Conformant (RMAP)
Tin	Mining Minerals Resources SARL	CONGO, DEMOCRATIC REPUBLIC OF THE	Conformant (RMAP)
Tin	Resind Industria e Comercio Ltda.	BRAZIL	Conformant (RMAP)
Tin	Super Ligas	BRAZIL	Conformant (RMAP)
Tin	Magnu's Minerai's Metais e Ligas Ltda.	BRAZIL	Conformant (RMAP)
Tin	Estanho de Rondonia S.A.	BRAZIL	Conformant (RMAP)
Tin	Fabrica Auricchio Industria e Comercio Ltda.	BRAZIL	Conformant (RMAP)
Tin	China Tin Group Co., Ltd.	CHINA	Conformant (RMAP)

Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CHINA	Conformant (RMAP)
Tin	Takehara PVD Materials Plant / PVD Materials Division of MITSUI MINING SMELTING	JAPAN	Conformant (RMAP)
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND	Conformant (RMAP)
Tin	Mitsubishi Materials Corporation	JAPAN	Conformant (RMAP)
Tin	Dowa	JAPAN	Conformant (RMAP)
Tin	CRM Synergies	SPAIN	Conformant (RMAP)
Tin	CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda	BRAZIL	Conformant (RMAP)
Tin	Tin Technology & Refining	UNITED STATES OF AMERICA	Conformant (RMAP)
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CHINA	Conformant (RMAP)
Tin	Yunnan Yunfan Non-ferrous Metals Co., Ltd.	CHINA	Conformant (RMAP)
Tin	PT ATD Makmur Mandiri Jaya	INDONESIA	Conformant (RMAP)
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CHINA	Conformant (RMAP)
Tin	PT Putera Sarana Shakti (PT PSS)	INDONESIA	Conformant (RMAP)
Tin	Operaciones Metalurgicas S.A.	BOLIVIA (PLURINATIONAL STATE OF)	Conformant (RMAP)
Tin	Minsur	PERU	Conformant (RMAP)
Tin	PT Cipta Persada Mulia	INDONESIA	Conformant (RMAP)

Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA	Conformant (RMAP)
Tin	PT Timah Tbk Kundur	INDONESIA	Conformant (RMAP)
Tin	PT Mitra Stania Prima	INDONESIA	Conformant (RMAP)
Tin	Mineracao Taboca S.A.	BRAZIL	Conformant (RMAP)
Tin	White Solder Metalurgia e Mineracao Ltda.	BRAZIL	Conformant (RMAP)
Tin	Rui Da Hung	TAIWAN, PROVINCE OF CHINA	Conformant (RMAP)
Tin	PT Timah Tbk Mentok	INDONESIA	Conformant (RMAP)
Tin	PT Bangka Prima Tin	INDONESIA	Conformant (RMAP)
Tin	Aurubis Berango	SPAIN	Conformant (RMAP)
Tin	Metallic Resources, Inc.	UNITED STATES OF AMERICA	Conformant (RMAP)
Tin	Jiangxi New Nanshan Technology Ltd.	CHINA	Conformant (RMAP)
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA	Conformant (RMAP)
Tin	EM Vinto	BOLIVIA (PLURINATIONAL STATE OF)	Conformant (RMAP)
Tin	PT Premium Tin Indonesia	INDONESIA	Conformant (RMAP)
Tin	O.M. Manufacturing Philippines, Inc.	PHILIPPINES	Conformant (RMAP)
Tin	PT Mitra Sukses Globalindo	INDONESIA	Conformant (RMAP)
Tin	PT Rajehan Ariq	INDONESIA	Conformant (RMAP)
Tin	HuiChang Hill Tin Industry Co., Ltd.	CHINA	Conformant (RMAP)
Tin	Global Advanced Metals Greenbushes Pty Ltd.	AUSTRALIA	Conformant (RMAP)
Tin	Precious Minerals and Smelting Limited	INDIA	Active (RMAP)

Tin	Ma'anshan Weitai Tin Co., Ltd.	CHINA	Non-conformant
Tungsten	TANIOBIS Smelting GmbH & Co. KG	GERMANY	Conformant (RMAP)
Tungsten	H.C. Starck Tungsten GmbH	GERMANY	Conformant (RMAP)
Tungsten	Masan High-Tech Materials	VIET NAM	Conformant (RMAP)
Tungsten	Asia Tungsten Products Vietnam Ltd.	VIET NAM	Conformant (RMAP)
Tungsten	A.L.M.T. Corp.	JAPAN	Conformant (RMAP)
Tungsten	Japan New Metals Co., Ltd.	JAPAN	Conformant (RMAP)
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CHINA	Conformant (RMAP)
Tungsten	Kennametal Huntsville	UNITED STATES OF AMERICA	Conformant (RMAP)
Tungsten	Wolfram Bergbau und Hutten AG	AUSTRIA	Conformant (RMAP)
Tungsten	Fujian Xinlu Tungsten Co., Ltd.	CHINA	Conformant (RMAP)
Tungsten	Global Tungsten & Powders LLC	UNITED STATES OF AMERICA	Conformant (RMAP)
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA	Conformant (RMAP)
Tungsten	Philippine Chuangxin Industrial Co., Inc.	PHILIPPINES	Conformant (RMAP)
Tungsten	Kennametal Fallon	UNITED STATES OF AMERICA	Conformant (RMAP)
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CHINA	Conformant (RMAP)
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CHINA	Conformant (RMAP)
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHINA	Conformant (RMAP)
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CHINA	Conformant (RMAP)

Tungsten	Xiamen Tungsten Co., Ltd.	CHINA	Conformant (RMAP)
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA	Conformant (RMAP)
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CHINA	Conformant (RMAP)
Tungsten	Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch	CHINA	Conformant (RMAP)
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA	Conformant (RMAP)
Tungsten	Hubei Green Tungsten Co., Ltd.	CHINA	Conformant (RMAP)
Tungsten	Philippine Bonway Manufacturing Industrial Corporation	PHILIPPINES	Conformant (RMAP)
Tungsten	Lianyou Resources Co., Ltd.	TAIWAN, PROVINCE OF CHINA	Conformant (RMAP)
Tungsten	Lianyou Metals Co., Ltd.	TAIWAN, PROVINCE OF CHINA	Conformant (RMAP)
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CHINA	Conformant (RMAP)
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHINA	Conformant (RMAP)
Tungsten	Cronimet Brasil Ltda	BRAZIL	Conformant (RMAP)
Tungsten	Tungsten Vietnam Joint Stock Company	VIET NAM	Conformant (RMAP)
Tungsten	Niagara Refining LLC	UNITED STATES OF AMERICA	Conformant (RMAP)
Tungsten	China Molybdenum Tungsten Co., Ltd.	CHINA	Conformant (RMAP)
Tungsten	Shinwon Tungsten (Fujian Shanghang) Co., Ltd.	CHINA	Conformant (RMAP)

Tungsten	KENEE MINING VIETNAM COMPANY LIMITED	VIET NAM	Conformant (RMAP)
Tungsten	Philippine Carreytech Metal Corp.	PHILIPPINES	Active (RMAP)

Dell's CY24 Cobalt Smelters or Refiners

Metal	Smelter Name	Country
Cobalt	La Compagnie de Traitement des Rejets de Kingamyambo S.A. (Metalkol S.A.)	CONGO, DEMOCRATIC REPUBLIC OF THE
Cobalt	Guangdong Jiana Energy Technology Co., Ltd.	CHINA
Cobalt	Guizhou CNGR Resource Recycling Industry Development Co., Ltd.	CHINA
Cobalt	Mutanda Mining SPRL	CONGO, DEMOCRATIC REPUBLIC OF THE
Cobalt	Jiangxi Jiangwu Cobalt Industrial Co., Ltd.	CHINA
Cobalt	Jingmen GEM Co., Ltd.	CHINA
Cobalt	Hunan CNGR New Energy Science & Technology Co., Ltd.	CHINA
Cobalt	Quzhou Huayou Cobalt New Material Co., Ltd.	CHINA
Cobalt	Uranus Chemicals	TAIWAN, PROVINCE OF CHINA
Cobalt	Anhui Hanrui New Material Co., Ltd.	CHINA
Cobalt	Gem (Jiangsu) Cobalt Industry Co., Ltd.	CHINA
Cobalt	Lanzhou Jinchuan Advanced Materials Technology Co., Ltd.	CHINA
Cobalt	Zhejiang Huayou Cobalt Company Limited	CHINA
Cobalt	Chemaf Etoile	CONGO, DEMOCRATIC REPUBLIC OF THE
Cobalt	Tenke Fungurume Mining SA	CONGO, DEMOCRATIC REPUBLIC OF THE
Cobalt	Umicore Finland Oy	FINLAND
Cobalt	Kisanfu Mining (Kimin)	CONGO, DEMOCRATIC REPUBLIC OF THE
Cobalt	SungEel HiTech Co., Ltd.	KOREA, REPUBLIC OF
Cobalt	Zhejiang Greatpower Cobalt Materials Co., Ltd.	CHINA
Cobalt	Societe pour le Traitement du Terril de Lubumbashi (STL)	CONGO, DEMOCRATIC REPUBLIC OF THE
Cobalt	Jiangsu Xiongfeng Technology Co., Ltd.	CHINA
Cobalt	Fujian Evergreen New Energy Technology Co.	CHINA
Cobalt	Zhuhai Kelixin Metal Materials Co., Ltd.	CHINA
Cobalt	Ganzhou Tengyuan Cobalt New Material Co., Ltd.	CHINA
Cobalt	Kamoto Copper Company	CONGO, DEMOCRATIC REPUBLIC OF THE
Cobalt	Umicore Olen	BELGIUM
Cobalt	Zhejiang New Era Zhongneng Technology Co., Ltd.	CHINA
Cobalt	Lianyou Resources Co., Ltd.	TAIWAN, PROVINCE OF CHINA
Cobalt	Impala Platinum - Base Metal Refinery (BMR)	SOUTH AFRICA
Cobalt	Impala Platinum - Rustenburg Smelter	SOUTH AFRICA
Cobalt	Port Colborne Refinery	CANADA

Cobalt	NORILSK NICKEL HARJAVALTA OY	FINLAND
Cobalt	Hunan Yacheng New Energy Co., Ltd.	CHINA
Cobalt	Cosmo Chemical, Ltd.	KOREA, REPUBLIC OF
Cobalt	Tianjin Maolian Science & Technology Co., Ltd.	CHINA
Cobalt	Jiangxi Miracle Golden Tiger Cobalt Co. Ltd.	CHINA
Cobalt	Ganzhou Highpower Technology Co., Ltd.	CHINA
Cobalt	Eti Bakir A.S	TURKEY
Cobalt	Mechema Taiwan Plant 2	TAIWAN, PROVINCE OF CHINA
Cobalt	Dynatec Madagascar Company	MADAGASCAR
Cobalt	Niihama Nickel Refinery, Sumitomo Metal Mining	JAPAN
Cobalt	Compagnie de Tifnout Tiranimine	MOROCCO
Cobalt	Vale - Long Harbour Processing Plant (LHPP)	CANADA
Cobalt	Murrin Murrin Nickel Cobalt Plant	AUSTRALIA
Cobalt	Harima Refinery, Sumitomo Metal Mining	JAPAN
Cobalt	Guangxi Yinyi Advanced Material Co., Ltd.	CHINA
Cobalt	ICoNiChem	UNITED KINGDOM OF GREAT BRITAIN AND NORTHERN IRELAND
Cobalt	Hunan Brunp Recycling Technology Co., Ltd.	CHINA
Cobalt	Guangdong Fangyuan New Materials Group Co., Ltd.	CHINA
Cobalt	Jiangxi Ruida New Energy Technology Co., Ltd.	CHINA
Cobalt	Guizhou Red Star Electronic Material Co., Ltd.	CHINA
Cobalt	Ruashi Mining SAS	CONGO, DEMOCRATIC REPUBLIC OF THE
Cobalt	Vital Materials Workshop	CHINA
Cobalt	PT Mechema Indonesia	INDONESIA
Cobalt	Mechema Chemicals shang-yu	CHINA
Cobalt	Mechema Chemicals (Thailand) Co., Ltd.	THAILAND
Cobalt	W&Q Metal Products Co., Limited	CHINA
Cobalt	Fairsky Industrial Co., Limited	CHINA
Cobalt	Coral Bay Nickel Corporation (CBNC)	PHILIPPINES
Cobalt	MKM - La Miniere de Kalumbwe Myunga	CONGO, DEMOCRATIC REPUBLIC OF THE
Cobalt	Hefei Rongjie Metal Technology Co., Ltd.	CHINA
Cobalt	Mechema Korea, Co., Ltd.	KOREA, REPUBLIC OF
Cobalt	Mechema Taiwan Plant 1	TAIWAN, PROVINCE OF CHINA
Cobalt	METAL MINES SARL	CONGO, DEMOCRATIC REPUBLIC OF THE
Cobalt	Chizhou CN New Materials and Technology Co., Ltd.	CHINA
Cobalt	Prony Resources New Caledonia	FRANCE
Cobalt	XTC New Energy Materials (Xiamen) LTD.	CHINA

Cobalt	Xiangtan Huacheng Nickel Cobalt New Material Co., Ltd.	CHINA
Cobalt	Taganito HPAL Nickel Corporation (THPAL)	PHILIPPINES
Cobalt	Ningbo Yanmen Chemical Co., Ltd.	CHINA
Cobalt	Hunan Jinxin New Material Holding Co., Ltd.	CHINA
Cobalt	Glencore Nikkelverk Refinery	NORWAY
Cobalt	Vital Materials Plant	CHINA

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