

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

**FORM SD**  
**Specialized Disclosure Report**

**VERIFONE SYSTEMS, INC.**  
(Exact name of registrant as specified in its charter)

**Commission File Number: 001-32465**

**Delaware**  
(State or Other Jurisdiction of Incorporation or Organization)

**04-3692546**  
(IRS Employer Identification No.)

**88 West Plumeria Drive**  
**San Jose, CA 95134**  
(Address of principal executive offices, including zip code)

**Albert Liu**  
**408-232-7800**  
(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, 2015.

## **Section 1 - Conflict Minerals Disclosure**

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

The registrant's Conflict Minerals Report for the calendar year ended December 31, 2015 is attached hereto as Exhibit 1.01 and is publicly available at: <http://ir.verifone.com/>.

### **Item 1.02 - Exhibit**

The registrant's Conflict Minerals Report for the calendar year ended December 31, 2015 is attached hereto as Exhibit 1.01.

## **Section 2 - Exhibits**

Exhibit 1.01 - Conflict Minerals Report as required by Items 1.01 and 1.02 of this Form for the calendar year ended December 31, 2015.

## **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.

### **VERIFONE SYSTEMS, INC.**

By: /s/ Albert Liu  
Name: Albert Liu  
Title: Executive Vice President, Corporate Development and  
General Counsel

Date: May 31, 2016

**VeriFone Systems, Inc.**  
**Conflict Minerals Report**

This Conflict Minerals Report of VeriFone Systems, Inc. for the calendar year ended December 31, 2015 is presented in compliance with Rule 13p-1 under the Securities Exchange Act of 1934.

**Introduction and Company Overview**

VeriFone Systems, Inc. (“Verifone”, “we” or “us”) is a global leader in secure electronic payment solutions at the point of sale. We design, manufacture and sell electronic point of sale terminals and pin pads, and related accessories and peripheral equipment (collectively the “Products”). We also sell complementary solutions and services that enable secure electronic payment transactions and value-added services at the point of sale. The manufacture of our point of sale terminals and pin pads, and related accessories and peripheral equipment, is outsourced to third party contract manufacturers.

Pursuant to the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, (the “Dodd-Frank Act”), certain public companies, including us, are required to provide disclosures about the use of specified conflict minerals originating from the Democratic Republic of the Congo (the “DRC”) or any of the nine adjoining countries, (together with the DRC, the “Covered Countries”). The term “conflict minerals” is defined as: (A) columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives, which are limited to tantalum, tin, and tungsten; or (B) any other mineral or its derivatives determined by the U.S. Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country. For purposes of this Specialized Disclosure Report on Form SD and the accompanying Conflict Minerals Report, we refer to tin, tantalum, tungsten and gold as the “3TG”.

In August 2012, the Securities and Exchange Commission (“SEC”) issued Rule 13p-1 of the Securities Exchange Act of 1934, as amended (“Rule 13p-1”), to implement the reporting and disclosure requirements related to conflict minerals imposed by the Dodd-Frank Act. Under Rule 13p-1, we, like other U.S. public companies, are first required to determine whether our manufactured products contain any of the 3TG and whether, for each product, such minerals are necessary to: (i) the functionality of the manufactured product and (ii) the production process of the manufactured product. If so, we are further required to conduct a reasonable country of origin inquiry (“RCOI”) into the origin of 3TG used in our products and determine whether the 3TG may have originated from any of the Covered Countries, or are from recycled or scrap sources. If we are unable to determine based on our RCOI that the 3TG are not from a Covered Country or are from recycled or scrap sources, then we must additionally exercise due diligence to determine the source and chain of custody of the 3TG.

For calendar year 2015, we determined that conflict minerals are necessary to the functionality or production of our Products and, accordingly, conducted a reasonable country of origin inquiry (“RCOI”) as described in this Conflict Minerals Report.

### **Due diligence over conflict minerals source and chain of custody**

Verifone’s due diligence framework tracks in all material respects the recommendations set forth in “*Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*” developed by the Organization for Economic Cooperation and Development (“OECD”).

The OECD guidance is an internationally recognized due diligence framework designed to help companies develop a system to avoid contributing to conflict through their mineral or metal purchasing decisions and practices. It includes a five-step framework that can be used to create a responsible supply chain, including (1) establishing a management system, (2) identifying and assessing risks in the supply chain, (3) designing and implementing a strategy to respond to identified risks, (4) supporting the development and implementation of independent third-party audits of smelters/refiners’ sourcing, and (5) publicly reporting on supply chain practices and due diligence.

We use this framework to conduct due diligence if we are unable to determine that the 3TG in the materials supplied for our Products are conflict-free based on information gathered from our suppliers and verified using shared industry information. We formalized this framework into a written program document and continue to incorporate the guidance into our existing business processes and procedures. Our goal is to maintain a program that meaningfully and effectively supports our conflict minerals objectives.

Our due diligence framework consists of the five components as identified in the OECD guidance and described below:

1. Internal management system for Conflict Minerals.

The following Conflict Minerals Statement sets forth our basic philosophy and objectives with respect to conflict minerals in our supply chain:

Verifone is committed to being a responsible corporate citizen in its sourcing and procurement activities. We believe that if each company does its part, enormous strides can be made in responsible sourcing. We support government and industry initiatives for responsible sourcing. We seek to avoid the use of conflict minerals purchased from sources that finance or benefit armed groups who commit human rights abuses in the Democratic Republic of the Congo and adjoining countries, and avoid contributing to conflict in our sourcing and procurement practices. We expect our suppliers to provide required information to support our due diligence efforts and to support our goals for conflict-free sourcing. We intend to source from socially responsible suppliers.

These objectives are supported through management of our conflict minerals program by a cross-functional conflict minerals committee. The committee is comprised of subject matter experts from key departments, including supply

chain, procurement, quality control, engineering and legal. The committee meets weekly to monitor program status and maintain open lines of communication with executive management and other stakeholders. Corporate oversight of the program is provided by the Chief Operations Officer, General Counsel, Vice President of Strategy and Operations, and the Chief Procurement Officer. The committee provides quarterly updates and presents an annual program briefing to the executive sponsors.

The committee has primary responsibility for designing and maintaining Verifone's system of controls and transparency over the supply chain. Key elements of the program include, but are not limited to:

- Supplier Engagement and Communication: We incorporate conflict mineral provisions in our supplier agreements and supplier qualification process, including consideration of conflict free status. Suppliers included in our annual conflict minerals assessment are sent a formal letter that communicates our program objectives and expectations, including cooperation in providing relevant data. Targeted communications are sent to suppliers during data collection and due diligence efforts. We continue to evaluate ways to improve supplier engagement and will include information on training and other relevant resources in the next year.
- Smelter/Refiner Identification: Verifone's ability to conclusively determine the country of origin and chain of custody of the 3TG in our supply chain is limited. Our supply chain is global, multi-tiered and highly complex. Verifone is many tiers removed in the supply chain from the smelters, refineries and mines of origin for minerals contained or used in our Products. Therefore, we must rely on our direct suppliers to identify the upstream smelters/refiners of the 3TG in the supply chain. We use the standard Conflict Minerals Reporting Template (CMRT) developed and updated by the Conflict-Free Sourcing Initiative (CFSI) to survey our direct suppliers. The CMRT facilitates the collection of information through the supply chain, including mineral country of origin and identification of smelters and refiners.

In order to facilitate our data collection and supplier communication, we engaged a third party service provider with expertise in conflict minerals management to collect, maintain, monitor and categorize CMRT responses and supplier communications in a computerized database. This enable us to better track and analyze our supply chain data and conduct our conflict minerals assessment. We also use these reports to better engage with our suppliers on information related to our supply chain.

- Due Diligence: We participate in industry-wide efforts to determine the status and obtain information on the smelters/refiners identified by our suppliers. This includes the Conflict-Free Smelters Program (CSFP) and other industry efforts recognized and cross-referenced by the CFSI, including the London Bullion Metal Association (LBMA) and Responsible Jewelry Council (RJC).

We use this collective and shared information, such as the audited and certified conflict-free smelters and refineries under the CFSP and RCOI data developed by CFSI. Given our position in the supply chain, use of shared data is the most effective way to validate the source of 3TG in our supply chain.

- Grievance Mechanism: Verifone maintains a compliance hotline allowing interested persons to voice concerns regarding business practices, ethics or suspected or potential violations of our policies or laws. The hotline is published on our webpage and available internally to all employees. We also include contact information and dedicated email address in our supplier communications should they have questions concerning our conflict minerals program.

Our conflict minerals committee monitors the effectiveness of our internal management system and will continue to assess processes and procedures to support the objectives set out in our Conflict Minerals Statement.

## 2. Identifying and assessing risk in our supply chain.

For 2015, we identified the direct suppliers of parts/components used in the manufacture of our products that may contain one or more of the 3TG. The identified direct suppliers were added to the third party database and included in our 2015 conflict minerals assessment. Verifone issued a letter to each supplier along with the most recent version of the CMRT. The letter communicated the importance of our program, as well as, our expectation that suppliers will cooperate in the data collection, complete the CMRT and identify the smelters/refiners in the supply chain.

To facilitate response rates, our service provider sent a series of outreach communications and reminders. Suppliers that did not respond after three communication attempts were automatically added to a monthly progress report. The conflict minerals committee reviewed the progress report and sent additional email reminders. If no response, the committee notified the relevant Verifone sourcing and supply team to directly contact suppliers and request a completed CMRT. By leveraging the experience of our third party service provider and the analytics available through the computerized database, we were able to engage more frequently with our suppliers and to provide more targeted follow up communications.

Through these efforts, we exceeded our initial goal of receiving CMRT responses covering 85% of the parts and components included in our assessment and ultimately received CMRT responses covering 89% of the parts and components included in our assessment. Using the CMRT information, we then compiled a comprehensive list of the smelters and refiners reported by our direct suppliers. We used the Smelter Reference List maintained and updated by CFSI to validate the information and identified 287 recognized smelters/refiners. We then evaluated all 287 of the recognized smelters/refiners against the Reasonable Country of Origin Inquiry (RCOI) data maintained by CFSI. The list provides country of origin information for smelters/refiners and, according to CFSI, is the most detailed information currently available on source of 3TG.

We designed our processes to evaluate our supply chain using a risk-based approach. We use the CMRT information to guide our assessments and further due diligence efforts. For example, if a Covered Country is referenced in the



CMRT or RCOI data, we review the CFSP list and other independent third party audit programs (*e.g.*, LBMA). The CFSP uses independent third-party audits to identify smelters/refiners that have conflict minerals due diligence processes in place. We also review the smelters/refiner's conflict minerals policy if published and available. Results of our risk assessment are maintained electronically.

Our conflict minerals committee continually assess the status of our conflict minerals program, including the identification of risks. The executive sponsors receive quarterly updates and attend an annual briefing on the results of our risk assessment and due diligence efforts.

### 3. Responding to risks in our supply chain.

To monitor and respond to risks in our supply chain, we utilize the standard CMRT tool to collect relevant information and rely on information provided through validation programs such as the CFSP and LBMA to determine the status of smelters and refineries.

Given our position in the supply chain, our ability to directly impact smelters/refiners upstream in our supply chain is limited. As such, our risk mitigation efforts are focused on our direct suppliers and participation in third party audit programs as detailed below. For example, we work with our service provider to identify and directly engage non-responsive suppliers. Members of our conflict minerals committee conduct initial outreach and will engage senior leaders in sourcing and procurement to work directly with non-responsive suppliers. As we continue to improve our conflict minerals program, we are focused on improving supplier engagement by including training and other resources in our communications and adding conflict minerals checkpoint in the periodic assessments of our direct suppliers. We will continue to provide updates to our executive sponsors and have implemented a written risk management plan in the event we identify an unacceptable risk in our supply chain.

### 4. Independent third-party audits of smelters/refiners' sourcing.

Verifone does not have direct relationships or contact with the upstream smelters or refineries in our supply chain. Due to our position in the supply chain and the diversity of the parts and components used in our products, we are not in a position to conduct on-site spot checks or audits of the smelters and refineries in our supply chain. Like similarly situated companies, we rely on external audit programs, such as the Conflict Free Smelter Program ("CFSP") to demonstrate RCOI and to validate smelter procurement and due diligence processes.

In support of the third party audit programs, we continue to improve communication with our direct suppliers, including flowing information upstream about the CFSP, available training resources and other information relevant to conflict minerals due diligence. The goal of these communications is to encourage our suppliers to support the CFSP and other industry efforts. We continue to support the CFSP through our membership in CFSI and participation in the smelter engagement and due diligence working groups.

## 5. Public Reporting.

Verifone files with the SEC a Form SD and this Conflict Minerals Report to describe to the public our due diligence efforts. This Conflict Minerals Report is also available on our website under our Investor Relations section at <http://ir.verifone.com/>. We continue to evaluate ways to improve our communication with customers and the interested public.

### **Results of due diligence**

As of the date of this Conflict Minerals Report, we received CMRT responses covering 89% of the parts and components included in our assessment. The responses from our suppliers included 287 smelters and refiners recognized on the Smelter Reference List maintained and updated by CFSI. We reviewed the 287 of the recognized smelters/refiners against the Reasonable Country of Origin Inquiry (RCOI) data maintained by CFSI. The list provides country of origin information for smelters/refiners and, according to CFSI, is the most detailed information currently available on source of 3TG.

We further assessed whether the supplier has indicated that any of the 3TGs may have been sourced from the Covered Countries and utilized the information available through CFSI's Conflict Free Smelter Program (CFSP) to conduct further diligence. The CFSP was developed by the Electronic Industry Citizenship Coalition (the "EICC") and the Global E-Sustainability Initiative ("GeSI") and provides an independent, third-party audit that determines which smelters and refiners can be validated as "conflict-free," in line with current global standards. The CFSP list includes the status of smelters/refiners, including those that are compliant with CFSP assessment protocols and those that are active and committed to undergo CFSP audit or are participating a one of the cross-recognized programs (e.g., LBMA).

Of the 287 total CFSI recognized smelters/refiners identified by our suppliers, we found the following:

- Approximately 75% were identified under the CFSP protocol as compliant or "conflict-free"; and
- Approximately 18% were identified under the CFSP protocol as a known smelter or refiner and indicated as: (1) re-audit in process, (2) active and or otherwise have signed the CFSP's agreements to exchange information and/or be audited under the CFSP, or (3) having agreed to complete a CFSP validation by the TI-CMC within two years of membership.

We will continue to monitor the status of these smelters and refiners through our third party provider and the shared RCOI and CFSP information provided to use through CFSI membership. Based on our assessment, we do not have sufficient information to enable us to determine the origin and/or conflict-free status. We have provided, as Appendix A hereto a list of the 287 smelters/refiners identified by our suppliers consisting of recognized smelters that have an ID number assigned by CFSI.

As discussed above, we plan to continue to participate in industry efforts by enhancing our supplier communications program (including encouraging our suppliers to work with their smelters to become certified as conflict free) and sharing information to facilitate and support our conflict minerals policy objectives.

## Appendix A - Smelter List

Gold	CID000015	Advanced Chemical Company	UNITED STATES
Gold	CID000189	Cendres + Métaux SA	SWITZERLAND
Gold	CID000328	Daejin Indus Co., Ltd.	KOREA, REPUBLIC OF
Gold	CID000359	DSC (Do Sung Corporation)	KOREA, REPUBLIC OF
Gold	CID001147	Metalor Technologies (Suzhou) Ltd.	CHINA
Gold	CID001236	Navoi Mining and Metallurgical Combinat	UZBEKISTAN
Gold	CID001555	Samduck Precious Metals	KOREA, REPUBLIC OF
Gold	CID001955	Torecom	KOREA, REPUBLIC OF
Gold	CID002355	Faggi Enrico S.p.A.	ITALY
Gold	CID002459	Geib Refining Corporation	UNITED STATES
Gold	CID002511	KGHM Polska MiedŹ Spó³ka Akcyjna	POLAND
Gold	CID002605	Korea Zinc Co. Ltd.	KOREA, REPUBLIC OF
Gold	CID002777	SAXONIA Edelmetalle GmbH	GERMANY
Gold	CID002778	WIELAND Edelmetalle GmbH	GERMANY
Gold	CID000019	Aida Chemical Industries Co., Ltd.	JAPAN
Gold	CID000035	Allgemeine Gold-und Silberscheideanstalt A.G.	GERMANY
Gold	CID000041	Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN
Gold	CID000058	AngloGold Ashanti Córrego do Sítio Mineração	BRAZIL
Gold	CID000077	Argor-Heraeus SA	SWITZERLAND
Gold	CID000082	Asahi Pretec Corporation	JAPAN
Gold	CID000090	Asaka Riken Co., Ltd.	JAPAN
Gold	CID000113	Aurubis AG	GERMANY
Gold	CID000128	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES
Gold	CID000157	Boliden AB	SWEDEN
Gold	CID000176	C. Hafner GmbH + Co. KG	GERMANY
Gold	CID000185	CCR Refinery - Glencore Canada Corporation	CANADA
Gold	CID000233	Chimet S.p.A.	ITALY
Gold	CID000362	DODUCO GmbH	GERMANY
Gold	CID000401	Dowa	JAPAN
Gold	CID000425	Eco-System Recycling Co., Ltd.	JAPAN
Gold	CID000493	OJSC Novosibirsk Refinery	RUSSIAN FEDERATION
Gold	CID000694	Heimerle + Meule GmbH	GERMANY
Gold	CID000707	Heraeus Ltd. Hong Kong	CHINA
Gold	CID000711	Heraeus Precious Metals GmbH & Co. KG	GERMANY
Gold	CID000801	Inner Mongolia Qiankun Gold and Silver Refinery Share Company Limited	CHINA
Gold	CID000807	Ishifuku Metal Industry Co., Ltd.	JAPAN
Gold	CID000814	Istanbul Gold Refinery	TURKEY
Gold	CID000823	Japan Mint	JAPAN
Gold	CID000855	Jiangxi Copper Company Limited	CHINA
Gold	CID000920	Asahi Refining USA Inc.	UNITED STATES
Gold	CID000924	Asahi Refining Canada Limited	CANADA
Gold	CID000927	JSC Ekaterinburg Non-Ferrous Metal Processing Plant	RUSSIAN FEDERATION

Gold	CID000929	JSC Uralelectromed	RUSSIAN FEDERATION
Gold	CID000937	JX Nippon Mining & Metals Co., Ltd.	JAPAN
Gold	CID000969	Kennecott Utah Copper LLC	UNITED STATES
Gold	CID000981	Kojima Chemicals Co., Ltd.	JAPAN
Gold	CID001078	LS-NIKKO Copper Inc.	KOREA, REPUBLIC OF
Gold	CID001113	Materion	UNITED STATES
Gold	CID001119	Matsuda Sangyo Co., Ltd.	JAPAN
Gold	CID001149	Metalor Technologies (Hong Kong) Ltd.	CHINA
Gold	CID001152	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE
Gold	CID001153	Metalor Technologies SA	SWITZERLAND
Gold	CID001157	Metalor USA Refining Corporation	UNITED STATES
Gold	CID001161	METALÚRGICA MET-MEX PEÑÓLES, S.A. DE C.V	MEXICO
Gold	CID001188	Mitsubishi Materials Corporation	JAPAN
Gold	CID001193	Mitsui Mining and Smelting Co., Ltd.	JAPAN
Gold	CID001204	Moscow Special Alloys Processing Plant	RUSSIAN FEDERATION
Gold	CID001220	Nadir Metal Rafineri San. Ve Tic. A. <sup>a</sup> .	TURKEY
Gold	CID001259	Nihon Material Co., Ltd.	JAPAN
Gold	CID001322	Elemetal Refining, LLC	UNITED STATES
Gold	CID001325	Ohura Precious Metal Industry Co., Ltd.	JAPAN
Gold	CID001326	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	RUSSIAN FEDERATION
Gold	CID001352	PAMP SA	SWITZERLAND
Gold	CID001386	Prioksky Plant of Non-Ferrous Metals	RUSSIAN FEDERATION
Gold	CID001397	PT Aneka Tambang (Persero) Tbk	INDONESIA
Gold	CID001498	PX Précinox SA	SWITZERLAND
Gold	CID001512	Rand Refinery (Pty) Ltd.	SOUTH AFRICA
Gold	CID001534	Royal Canadian Mint	CANADA
Gold	CID001573	Schone Edelmetaal B.V.	NETHERLANDS
Gold	CID001585	SEMPSA Joyería Platería SA	SPAIN
Gold	CID001622	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CHINA
Gold	CID001736	Sichuan Tianze Precious Metals Co., Ltd.	CHINA
Gold	CID001756	SOE Shyolkovsky Factory of Secondary Precious Metals	RUSSIAN FEDERATION
Gold	CID001761	Solar Applied Materials Technology Corp.	TAIWAN
Gold	CID001798	Sumitomo Metal Mining Co., Ltd.	JAPAN
Gold	CID001875	Tanaka Kikinzoku Kogyo K.K.	JAPAN
Gold	CID001916	The Refinery of Shandong Gold Mining Co., Ltd.	CHINA
Gold	CID001938	Tokuriki Honten Co., Ltd.	JAPAN
Gold	CID001977	Umicore Brasil Ltda.	BRAZIL
Gold	CID001980	Umicore SA Business Unit Precious Metals Refining	BELGIUM
Gold	CID001993	United Precious Metal Refining, Inc.	UNITED STATES
Gold	CID002003	Valcambi SA	SWITZERLAND
Gold	CID002030	Western Australian Mint trading as The Perth Mint	AUSTRALIA
Gold	CID002100	YAMAMOTO PRECIOUS METAL CO., LTD.	JAPAN
Gold	CID002129	Yokohama Metal Co., Ltd.	JAPAN
Gold	CID002224	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA
Gold	CID002243	Zijin Mining Group Co., Ltd. Gold Refinery	CHINA
Gold	CID002314	Umicore Precious Metals Thailand	THAILAND

Gold	CID002509	MMTC-PAMP India Pvt., Ltd.	INDIA
Gold	CID002510	Republic Metals Corporation	UNITED STATES
Gold	CID002516	Singway Technology Co., Ltd.	TAIWAN
Gold	CID002561	Emirates Gold DMCC	UNITED ARAB EMIRATES
Gold	CID002580	T.C.A S.p.A	ITALY
Gold	CID002779	Ögussa Österreichische Gold- und Silber-Scheideanstalt GmbH	AUSTRIA
Gold	CID000180	Caridad	MEXICO
Gold	CID000264	Chugai Mining	JAPAN
Gold	CID000343	Daye Non-Ferrous Metals Mining Ltd.	CHINA
Gold	CID000651	Guoda Safina High-Tech Environmental Refinery Co., Ltd.	CHINA
Gold	CID000767	Hunan Chenzhou Mining Co., Ltd.	CHINA
Gold	CID000778	Hwasung CJ Co., Ltd.	KOREA, REPUBLIC OF
Gold	CID000956	Kazakhmys Smelting LLC	KAZAKHSTAN
Gold	CID001562	SAMWON METALS Corp.	KOREA, REPUBLIC OF
Gold	CID001619	Shandong Tiancheng Biological Gold Industrial Co., Ltd.	CHINA
Gold	CID002282	Morris and Watson	NEW ZEALAND
Gold	CID002761	SAAMP	FRANCE
Gold	CID000103	Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	TURKEY
Gold	CID000197	Yunnan Copper Industry Co., Ltd.	CHINA
Gold	CID000522	Gansu Seemine Material Hi-Tech Co., Ltd.	CHINA
Gold	CID000671	Hangzhou Fuchunjiang Smelting Co., Ltd.	CHINA
Gold	CID001029	Kyrgyzaltyn JSC	KYRGYZSTAN
Gold	CID001032	L'azurde Company For Jewelry	SAUDI ARABIA
Gold	CID001056	Lingbao Gold Company Limited	CHINA
Gold	CID001058	Lingbao Jinyuan Tonghui Refinery Co., Ltd.	CHINA
Gold	CID001093	Luoyang Zijin Yinhui Gold Refinery Co., Ltd.	CHINA
Gold	CID001362	Penglai Penggang Gold Industry Co., Ltd.	CHINA
Gold	CID001546	Sabin Metal Corp.	UNITED STATES
Gold	CID001754	So Accurate Group, Inc.	UNITED STATES
Gold	CID001909	Great Wall Precious Metals Co., Ltd. of CBPM	CHINA
Gold	CID001947	Tongling Nonferrous Metals Group Co., Ltd.	CHINA
Gold	CID002312	Guangdong Jinding Gold Limited	CHINA
Gold	CID002515	Fidelity Printers and Refiners Ltd.	ZIMBABWE
Gold	CID002560	Al Etihad Gold Refinery DMCC	UNITED ARAB EMIRATES
Gold	CID002563	Kaloti Precious Metals	UNITED ARAB EMIRATES
Gold	CID002567	Sudan Gold Refinery	SUDAN
Tantalum	CID000211	Changsha South Tantalum Niobium Co., Ltd.	CHINA
Tantalum	CID000291	Conghua Tantalum and Niobium Smeltry	CHINA
Tantalum	CID000410	Duoluoshan	CHINA
Tantalum	CID000456	Exotech Inc.	UNITED STATES
Tantalum	CID000460	F&X Electro-Materials Ltd.	CHINA
Tantalum	CID000616	Guangdong Zhiyuan New Material Co., Ltd.	CHINA
Tantalum	CID000731	Hi-Temp Specialty Metals, Inc.	UNITED STATES

Tantalum	CID000914	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINA
Tantalum	CID000917	Jiujiang Tanbre Co., Ltd.	CHINA
Tantalum	CID000973	King-Tan Tantalum Industry Ltd.	CHINA
Tantalum	CID001076	LSM Brasil S.A.	BRAZIL
Tantalum	CID001163	Metallurgical Products India Pvt., Ltd.	INDIA
Tantalum	CID001175	Mineração Taboca S.A.	BRAZIL
Tantalum	CID001192	Mitsui Mining & Smelting	JAPAN
Tantalum	CID001200	Molycorp Silmet A.S.	ESTONIA
Tantalum	CID001277	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA
Tantalum	CID001508	QuantumClean	UNITED STATES
Tantalum	CID001522	RFH Tantalum Smeltry Co., Ltd.	CHINA
Tantalum	CID001769	Solikamsk Magnesium Works OAO	RUSSIAN FEDERATION
Tantalum	CID001869	Taki Chemicals	JAPAN
Tantalum	CID001891	Telex Metals	UNITED STATES
Tantalum	CID001969	Ulba Metallurgical Plant JSC	KAZAKHSTAN
Tantalum	CID002232	Zhuzhou Cemented Carbide	CHINA
Tantalum	CID002307	Yichun Jin Yang Rare Metal Co., Ltd.	CHINA
Tantalum	CID002492	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA
Tantalum	CID002504	D Block Metals, LLC	UNITED STATES
Tantalum	CID002505	FIR Metals & Resource Ltd.	CHINA
Tantalum	CID002506	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA
Tantalum	CID002508	XinXing HaoRong Electronic Material Co., Ltd.	CHINA
Tantalum	CID002512	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHINA
Tantalum	CID002539	KEMET Blue Metals	MEXICO
Tantalum	CID002540	Plansee SE Liezen	AUSTRIA
Tantalum	CID002544	H.C. Starck Co., Ltd.	THAILAND
Tantalum	CID002545	H.C. Starck GmbH Goslar	GERMANY
Tantalum	CID002546	H.C. Starck GmbH Laufenburg	GERMANY
Tantalum	CID002547	H.C. Starck Hermsdorf GmbH	GERMANY
Tantalum	CID002548	H.C. Starck Inc.	UNITED STATES
Tantalum	CID002549	H.C. Starck Ltd.	JAPAN
Tantalum	CID002550	H.C. Starck Smelting GmbH & Co.KG	GERMANY
Tantalum	CID002556	Plansee SE Reutte	AUSTRIA
Tantalum	CID002557	Global Advanced Metals Boyertown	UNITED STATES
Tantalum	CID002558	Global Advanced Metals Aizu	JAPAN
Tantalum	CID002568	Kemet Blue Powder	UNITED STATES
Tantalum	CID002571	Tranzact, Inc.	UNITED STATES
Tantalum	CID002707	Resind Indústria e Comércio Ltda.	BRAZIL
Tin	CID000228	Chenzhou Yunxiang Mining and Metallurgy Company Limited	CHINA
Tin	CID000942	Gejiu Kai Meng Industry and Trade LLC	CHINA
Tin	CID001448	PT Karimun Mining	INDONESIA
Tin	CID001908	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	CHINA
Tin	CID002158	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA
Tin	CID002507	Phoenix Metal Ltd.	RWANDA
Tin	CID002572	Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company	VIET NAM

Tin	CID002573	Nghe Tinh Non-Ferrous Metals Joint Stock Company	VIET NAM
Tin	CID002574	Tuyen Quang Non-Ferrous Metals Joint Stock Company	VIET NAM
Tin	CID002592	CV Dua Sekawan	INDONESIA
Tin	CID002703	An Vinh Joint Stock Mineral Processing Company	VIET NAM
Tin	CID002825	An Thai Minerals Company Limited	VIET NAM
Tin	CID000244	Jiangxi Ketai Advanced Material Co., Ltd.	CHINA
Tin	CID000292	Alpha	UNITED STATES
Tin	CID000295	Cooperativa Metalurgica de Rondônia Ltda.	BRAZIL
Tin	CID000306	CV Gita Pesona	INDONESIA
Tin	CID000307	PT JusTindo	INDONESIA
Tin	CID000309	PT Aries Kencana Sejahtera	INDONESIA
Tin	CID000313	CV Serumpun Sebalai	INDONESIA
Tin	CID000315	CV United Smelting	INDONESIA
Tin	CID000402	Dowa	JAPAN
Tin	CID000438	EM Vinto	BOLIVIA
Tin	CID000468	Fenix Metals	POLAND
Tin	CID000538	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA
Tin	CID001070	China Tin Group Co., Ltd.	CHINA
Tin	CID001105	Malaysia Smelting Corporation (MSC)	MALAYSIA
Tin	CID001142	Metallic Resources, Inc.	UNITED STATES
Tin	CID001173	Mineração Taboca S.A.	BRAZIL
Tin	CID001182	Minsur	PERU
Tin	CID001191	Mitsubishi Materials Corporation	JAPAN
Tin	CID001314	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND
Tin	CID001337	Operaciones Metalurgical S.A.	BOLIVIA
Tin	CID001399	PT Artha Cipta Langgeng	INDONESIA
Tin	CID001402	PT Babel Inti Perkasa	INDONESIA
Tin	CID001419	PT Bangka Tin Industry	INDONESIA
Tin	CID001421	PT Belitung Industri Sejahtera	INDONESIA
Tin	CID001424	PT BilliTin Makmur Lestari	INDONESIA
Tin	CID001428	PT Bukit Timah	INDONESIA
Tin	CID001434	PT DS Jaya Abadi	INDONESIA
Tin	CID001438	PT Eunindo Usaha Mandiri	INDONESIA
Tin	CID001453	PT Mitra Stania Prima	INDONESIA
Tin	CID001457	PT Panca Mega Persada	INDONESIA
Tin	CID001458	PT Prima Timah Utama	INDONESIA
Tin	CID001460	PT Refined Bangka Tin	INDONESIA
Tin	CID001463	PT Sariwiguna Binasentosa	INDONESIA
Tin	CID001468	PT Stanindo Inti Perkasa	INDONESIA
Tin	CID001471	PT Sumber Jaya Indah	INDONESIA
Tin	CID001477	PT Timah (Persero) Tbk Kundur	INDONESIA
Tin	CID001482	PT Timah (Persero) Tbk Mentok	INDONESIA
Tin	CID001490	PT Tinindo Inter Nusa	INDONESIA
Tin	CID001493	PT Tommy Utama	INDONESIA
Tin	CID001539	Rui Da Hung	TAIWAN
Tin	CID001758	Soft Metais Ltda.	BRAZIL

Tin	CID001898	Thaisarco	THAILAND
Tin	CID002015	VQB Mineral and Trading Group JSC	VIET NAM
Tin	CID002036	White Solder Metalurgia e Mineração Ltda.	BRAZIL
Tin	CID002180	Yunnan Tin Group (Holding) Company Limited	CHINA
Tin	CID002455	CV Venus Inti Perkasa	INDONESIA
Tin	CID002468	Magnu's Minerai's Metais e Ligas Ltda.	BRAZIL
Tin	CID002479	PT Wahana Perkit Jaya	INDONESIA
Tin	CID002500	Melt Metais e Ligas S/A	BRAZIL
Tin	CID002503	PT ATD Makmur Mandiri Jaya	INDONESIA
Tin	CID002517	O.M. Manufacturing Philippines, Inc.	PHILIPPINES
Tin	CID002530	Pt Inti Stania Prima	INDONESIA
Tin	CID002570	CV Ayi Jaya	INDONESIA
Tin	CID002696	PT Cipta Persada Mulia	INDONESIA
Tin	CID002706	Resind Indústria e Comércio Ltda.	BRAZIL
Tin	CID002773	Metallo-Chimique N.V.	BELGIUM
Tin	CID002774	Elmet S.L.U. (Metallo Group)	SPAIN
Tin	CID002776	PT Bangka Prima Tin	INDONESIA
Tin	CID002816	PT Sukses Inti Makmur	INDONESIA
Tin	CID000448	Estanho de Rondônia S.A.	BRAZIL
Tin	CID000555	Gejiu Zili Mining And Metallurgy Co., Ltd.	CHINA
Tin	CID001063	Linwu Xianggui Ore Smelting Co., Ltd.	CHINA
Tin	CID000278	CNMC (Guangxi) PGMA Co., Ltd.	CHINA
Tin	CID000760	Huichang Jinshunda Tin Co., Ltd.	CHINA
Tin	CID001231	Nankang Nanshan Tin Manufactory Co., Ltd.	CHINA
Tin	CID002478	PT Tirus Putra Mandiri	INDONESIA
Tungsten	CID000966	Kennametal Fallon	UNITED STATES
Tungsten	CID002316	Jiangxi Yaosheng Tungsten Co., Ltd.	CHINA
Tungsten	CID002317	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CHINA
Tungsten	CID002318	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHINA
Tungsten	CID002551	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA
Tungsten	CID000004	A.L.M.T. TUNGSTEN Corp.	JAPAN
Tungsten	CID000105	Kennametal Huntsville	UNITED STATES
Tungsten	CID000218	Guangdong Xianglu Tungsten Co., Ltd.	CHINA
Tungsten	CID000258	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA
Tungsten	CID000499	Fujian Jinxin Tungsten Co., Ltd.	CHINA
Tungsten	CID000568	Global Tungsten & Powders Corp.	UNITED STATES
Tungsten	CID000766	Hunan Chenzhou Mining Co., Ltd.	CHINA
Tungsten	CID000769	Hunan Chunchang Nonferrous Metals Co., Ltd.	CHINA
Tungsten	CID000825	Japan New Metals Co., Ltd.	JAPAN
Tungsten	CID000875	Ganzhou Huaxing Tungsten Products Co., Ltd.	CHINA
Tungsten	CID001889	Tejing (Vietnam) Tungsten Co., Ltd.	VIET NAM
Tungsten	CID002011	Vietnam Youngsun Tungsten Industry Co., Ltd.	VIET NAM
Tungsten	CID002044	Wolfram Bergbau und Hütten AG	AUSTRIA
Tungsten	CID002082	Xiamen Tungsten Co., Ltd.	CHINA
Tungsten	CID002095	Xinhai Rendan Shaoguan Tungsten Co., Ltd.	CHINA
Tungsten	CID002315	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHINA



Tungsten	CID002319	Malipo Haiyu Tungsten Co., Ltd.	CHINA
Tungsten	CID002320	Xiamen Tungsten (H.C.) Co., Ltd.	CHINA
Tungsten	CID002321	Jiangxi Gan Bei Tungsten Co., Ltd.	CHINA
Tungsten	CID002494	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA
Tungsten	CID002502	Asia Tungsten Products Vietnam Ltd.	VIET NAM
Tungsten	CID002513	Chenzhou Diamond Tungsten Products Co., Ltd.	CHINA
Tungsten	CID002535	Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd.	CHINA
Tungsten	CID002536	Ganzhou Yatai Tungsten Co., Ltd.	CHINA
Tungsten	CID002541	H.C. Starck GmbH	GERMANY
Tungsten	CID002542	H.C. Starck Smelting GmbH & Co.KG	GERMANY
Tungsten	CID002543	Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC	VIET NAM
Tungsten	CID002579	Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji	CHINA
Tungsten	CID002589	Niagara Refining LLC	UNITED STATES
Tungsten	CID002649	Hydrometallurg, JSC	RUSSIAN FEDERATION
Tungsten	CID002313	Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.	CHINA
Tungsten	CID002531	Ganxian Shirui New Material Co., Ltd.	CHINA
Tungsten	CID000345	Dayu Weiliang Tungsten Co., Ltd.	CHINA
Tungsten	CID000868	Ganzhou Non-ferrous Metals Smelting Co., Ltd.	CHINA
Tungsten	CID002518	Dayu Jincheng Tungsten Industry Co., Ltd.	CHINA
Tungsten	CID002532	Pobedit, JSC	RUSSIAN FEDERATION