

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

FORM SD
Specialized Disclosure Report

SEVCON, INC.
(Exact name of registrant as specified in its charter)

Delaware
(State or other jurisdiction
of incorporation or organization)

1-9789
(Commission
File Number)

04-2985631
(IRS Employer
Identification No.)

155 Northboro Road, Southborough, Massachusetts
(Address of principal executive offices)

01772
(Zip Code)

Paul Farquhar, Chief Financial Officer (508) 281-5510
(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, 2016 to December 31, 2016.

Section 1 - Conflict Minerals Disclosure

Items 1.01 and 1.02 Conflict Minerals Disclosure and Report, Exhibit

A copy of Sevcon Inc.'s Conflict Minerals Report for the reporting period January 1, 2016 to December 31, 2016 is provided as Exhibit 1.01 hereto and is publicly available at www.sevcon.com/about-sevcon/environmental. Sevcon's determination and related disclosures relating to materials that may come from recycled and scrap sources are included in Sevcon's Conflict Minerals Report and incorporated by reference herein.

Section 2 – Exhibits

Item 2.01 Exhibits

List below the following exhibit filed as part of this report.

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

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.

SEVCON, INC.
(Registrant)

/s/ Paul N. Farquhar
By Paul N. Farquhar
Chief Financial Officer

May 31st, 2017
(Date)

Sevcon, Inc.
Conflict Minerals Report

For the reporting period from January 1, 2016 to December 31, 2016

Introduction

This Conflict Minerals Report of Sevcon, Inc. has been prepared pursuant to SEC Rule 13p-1 and Form SD (the “Rule”) for the reporting period January 1, 2016 to December 31, 2016.

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

As a producer of electronic equipment, Sevcon uses a supply base consisting mostly of electronic component manufacturers, distributors and assemblers. Therefore, the facilities used to process the necessary subject minerals in those products, and the country of origin of those subject minerals in those products are several steps down the global electronics supply chain.

The term “conflict-free” is used in this report to denote products, parts or materials where the subject minerals and their derivative metals are from smelters or refiners verified as complying with the Conflict-Free Sourcing Initiative’s Conflict-Free Smelter Program (the “CFSP”) or an equivalent third-party audit program.

Products

The products manufactured or contracted to be manufactured by Sevcon in calendar year 2016 were –

1. Motor controllers for electric and hybrid vehicles
2. Static and on-board battery chargers for electric and hybrid vehicles
3. DC/DC convertors for electric and hybrid vehicles
4. Other drivetrain system components for electric and hybrid vehicles
5. Industrial/rail/aerospace/automotive Capacitors

Sevcon Conflict Minerals Program and Due Diligence

Sevcon has:

1. Established strong company management systems, by having:
 - a. Established a policy to work towards eliminating conflict minerals from its supply chain, and has informed all suppliers of the objectives and reporting requirements. The policy is publicly available at www.sevcon.com/about/quality-environment.
 - b. Allocated internal management resource and responsibility for supplier chain due diligence.
 - c. Established a system of controls and transparency over the mineral supply chain. The details of this are described below.
 - d. Strengthened company engagement with suppliers:
 - All components specified by Sevcon and consumed during calendar year 2016 have been identified and traced to the manufacturer.
 - All manufacturers have been contacted, in order to trace subject mineral sources.
 - Data has been requested using the CFSI template, to ensure compliant smelters are identified.
-

- The responses have been analyzed, to confirm whether compliance has been achieved (i.e. all smelters declared, and included on the CFSI compliant smelters lists).
 - Where new supplier contracts are drafted, conflict minerals objectives and reporting requirements are being included.
- e. Made available the company Environmental Corrective and Preventive Action Procedure available for investigation of any risks relating to Conflict Minerals, with input to the EICC® GeSI program where appropriate.
2. Identified risk in the supply chain, and assessed the adverse impact of those risks.
 3. Designed and implemented a strategy to respond to identified risks:
 - Working with the suppliers to help them fully understand Sevcon’s requirements.
 - Advising on the EICC GeSI Initiative, and the reporting requirements.
 - Contacting component manufacturers directly to improve the reporting process.
 - Advising of Sevcon’s intention to move away from non-reporting or non-compliant suppliers.
 - As a final step, terminating our relationship with non-reporting and non-compliant suppliers.
 4. Utilized the EICC GeSI reporting program to analyse the responses of its manufacturers and suppliers.
 5. Reported the results of our supply chain due diligence publicly in Form SD as well as internally to senior management.

We conducted a survey of our manufacturing partners and their component suppliers using the template developed jointly by the companies of Electronic Industry Citizenship Coalition (EICC) and The Global e-Sustainability Initiative (GeSI), known as the CFSI Reporting Template (the “Template”). The Template was developed to facilitate disclosure and communication of information regarding smelters that provide material to a company’s supply chain. It includes questions regarding a company’s conflict-free policy, engagement with its direct suppliers, and a listing of the smelters the company and its suppliers use. In addition, the template contains questions about the origin of conflict minerals included in their products, as well as supplier due diligence.

Of the manufacturers within the scope of our RCOI, 52% confirmed as not supplying parts containing the subject minerals or using those minerals in their production process. Of the remaining manufacturers/suppliers, 81% responded, and 74% submitted responses in the appropriate EICC GeSI format. Of the responding suppliers, 65% were able to confirm that all of their supplying conflict minerals smelters were listed as compliant on the CFSI lists.

The due diligence methodology applied by Sevcon is based in all material aspects on the OECD “Five-Step Framework for Risk-Based Due Diligence in the Mineral Supply Chain,” including the relevant mineral specific supplements.

Our efforts to determine the mine or location of origin of the necessary conflict minerals in our products with the greatest possible specificity consisted of the due diligence measures described in this conflict minerals report. In particular, because independent third party audit programs validate whether sufficient evidence exists regarding country, mine and/or location of origin of the subject minerals that the audited smelter or refiner facilities have processed, we relied on the information made available by such programs for the smelters and refiners in our supply chain.

Determination

We were unable to ascertain the country of origin and/or chain of custody of all necessary subject minerals processed by the facilities that contributed to our products because, for this reporting period, (1) certain smelter and refiner facilities had not yet received a “conflict free” designation from an independent third party audit program, and (2) some manufacturers and their materials suppliers did not respond to our requests for country of origin or chain of custody information.

With respect to the products on which Sevcon exercised due diligence, Annex I lists the facilities which, to the extent known, processed the necessary subject minerals in our products. Annex II summarises the countries for those facilities. Annex III shows the number of smelters which are conflict free as determined by the Conflict-Free Smelter Program (CFSP), and those which are in their audit program with the aim of achieving compliance.

Our investigations have found two smelters in our supply chain from the covered countries –

1. Phoenix Metal Ltd. of Kigali, Rwanda, supplying tin.
2. Universal Precious Metals Refining of Lusaka, Zambia, supplying gold.

Both companies have registered to the CFSI program, but are not in the current compliant or active list. Sevcon is working with the relevant suppliers to ensure that these smelters progress towards certification. If they do not make satisfactory progress, we currently expect they will be removed from the supply chain.

Continuous Improvement Strategy

In order to improve from the above initial results and to mitigate the risk that our necessary conflict minerals will benefit armed groups, Sevcon is taking the following actions:

- a. Working with the suppliers, sub-suppliers and manufacturers to engage with the smelter to enroll in the EICC GeSI Conflict Free Smelters program;
- b. Failing action a, working with the supplier and sub-supplier to select an alternative conflict minerals supplier with supplying smelters participating in the EICC GeSI Conflict Free Smelters program;
- c. Failing action b, selecting an alternative supplier or sub-supplier who can offer conflict-free materials with supplying smelters participating in the EICC GeSI Conflict Free Smelters program.
- d. Monitoring progress towards conflict-free status, by reporting trends publicly and within Sevcon and its supplier base.

Continuous Improvement Results

The table below demonstrates the improvement in reporting and compliance achieved from 2013 to 2016 (reporting periods).

| Reporting period | 2013 | 2014 | 2015 | 2016 | Improvement From 2015 |
|-------------------------|-------------|-------------|-------------|-------------|------------------------------|
| Response level | 44% | 74% | 81% | 81% | 0% |
| EICC GeSI format | 54% | 67% | 76% | 74% | -2% |
| Compliant response | 0% | 45% | 47% | 65% | +18% |

Progress has been maintained, even with the acquisition of Bassi SRL and inclusion of its suppliers for the first time.

ANNEX I

| Metal | Smelter Name | Smelter Country |
|--------------|-------------------------------------------------|------------------------|
| Gold | Abington Reldan Metals, LLC | USA |
| Gold | Advanced Chemical Company | USA |
| Gold | AGR Matthey | AUSTRALIA |
| Gold | Aida Chemical Industries Co. Ltd. | JAPAN |
| Gold | Aktyubinsk Copper Company TOO | RUSSIAN FEDERATION |
| Gold | Al Etihad Gold Refinery DMCC | UNITED ARAB EMIRATES |
| Gold | Allgemeine Gold- und Silberscheideanstalt A.G. | GERMANY |
| Gold | Almalyk Mining and Metallurgical Complex (AMMC) | UZBEKISTAN |
| Gold | AngloGold Ashanti Córrego do Sítio Mineração | BRAZIL |
| Gold | Argor-Heraeus S.A. | SWITZERLAND |
| Gold | Asahi Pretec Corp. | JAPAN |
| Gold | Asahi Refining USA Inc. | USA |
| Gold | Asaka Riken Co Ltd | JAPAN |

| | | |
|------|-----------------------------------------------------------------|----------------------|
| Gold | Atasay Kuyumculuk Sanayi Ve Ticaret A.S. | TURKEY |
| Gold | AU Traders and Refiners | SOUTH AFRICA |
| Gold | AURA-II | USA |
| Gold | Aurubis AG | GERMANY |
| Gold | Baiyin Nonferrous Group Co.,Ltd. | CHINA |
| Gold | Bangalore Refinery | INDIA |
| Gold | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | PHILIPPINES |
| Gold | Barrick Gold Corporation | CHILE |
| Gold | Bauer Walser AG | GERMANY |
| Gold | Boliden AB | SWEDEN |
| Gold | C. Hafner GmbH + Co. KG | GERMANY |
| Gold | Caridad | MEXICO |
| Gold | CCR Refinery - Glencore Canada Corporation | CANADA |
| Gold | Cendres + Métaux S.A. | SWITZERLAND |
| Gold | Changcheng Gold & Silver Refining Factory | CHINA |
| Gold | Chimet S.p.A. | ITALY |
| Gold | China Gold International Resources Corp. Ltd | CHINA |
| Gold | Chugai Mining | JAPAN |
| Gold | CMP-COMPAGNIE DES METAUX PRECIEUX | FRANCE |
| Gold | Daejin Indus Co., Ltd. | KOREA (REPUBLIC OF) |
| Gold | Daye Non-Ferrous Metals Mining Ltd. | CHINA |
| Gold | Degussa Sonne / Mond Goldhandel GmbH | GERMANY |
| Gold | DODUCO GmbH | GERMANY |
| Gold | Dowa | JAPAN |
| Gold | DSC (Do Sung Corporation) | KOREA (REPUBLIC OF) |
| Gold | Eco-System Recycling Co., Ltd. | JAPAN |
| Gold | Elemental Refining, LLC | USA |
| Gold | Emirates Gold DMCC | UNITED ARAB EMIRATES |
| Gold | Faggi Enrico S.p.A. | ITALY |
| Gold | Fidelity Printers and Refiners Ltd. | ZIMBABWE |
| Gold | Furukawa Company, Ltd. | JAPAN |
| Gold | Gannon & Scott | USA |
| Gold | Gansu Seemine Material Hi-Tech Co., Ltd. | CHINA |
| Gold | Geib Refining Corporation | USA |
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM | CHINA |
| Gold | Guangdong Jinding Gold Limited | CHINA |
| Gold | Gujarat Gold Centre | INDIA |
| Gold | Guoda Safina High-Tech Environmental Refinery Co., Ltd. | CHINA |
| Gold | Hangzhou Fuchunjiang Smelting Co., Ltd. | CHINA |
| Gold | Harmony Gold Mining Company Limited | SOUTH AFRICA |
| Gold | Heimerle + Meule GmbH | GERMANY |
| Gold | Henan Yuguang Gold & Lead Co., Ltd. | CHINA |
| Gold | Heraeus Ltd Hong Kong | HONG KONG |
| Gold | Heraeus Precious Metals GmbH & Co. KG | GERMANY |
| Gold | HOMESTAKE MINING COMPANY | CANADA |
| Gold | Hunan Chenzhou Mining Co., Ltd. | CHINA |
| Gold | HwaSeong CJ Co., Ltd. | KOREA (REPUBLIC OF) |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | CHINA |
| Gold | Ishifuku Metal Industry Co., Ltd. | JAPAN |
| Gold | Istanbul Gold Refinery | TURKEY |

| | | |
|------|-----------------------------------------------------------------------------|----------------------|
| Gold | Italpreziosi S.p.A. | ITALY |
| Gold | Japan Mint | JAPAN |
| Gold | Jiangxi Copper Co., Ltd. | CHINA |
| Gold | Jinlong Copper Co., Ltd. | CHINA |
| Gold | Johnson Matthey Chemicals Ltd. | UNITED KINGDOM |
| Gold | Johnson Matthey Inc | USA |
| Gold | Johnson Matthey Limited | CANADA |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant | RUSSIAN FEDERATION |
| Gold | JSC Uralelectromed | RUSSIAN FEDERATION |
| Gold | JX Nippon Mining & Metals Co., Ltd | JAPAN |
| Gold | K.A.Rasmussen as | NORWAY |
| Gold | Kaloti Precious Metals | UNITED ARAB EMIRATES |
| Gold | Kazakhmys Smelting LLC | KAZAKHSTAN |
| Gold | Kazzinc | KAZAKHSTAN |
| Gold | Kennecott Utah Copper LLC | USA |
| Gold | KGHM Polska Miedz Spółka Akcyjna | POLAND |
| Gold | Kojima Chemicals Co. Ltd | JAPAN |
| Gold | Korea Metal Co. Ltd | KOREA, REPUBLIC OF |
| Gold | Korea Zinc Co., Ltd. | KOREA (REPUBLIC OF) |
| Gold | Kyrgyzaltyn JSC | KYRGYZSTAN |
| Gold | L'azurde Company For Jewelry | SAUDI ARABIA |
| Gold | Lingbao Gold Co., Ltd. | CHINA |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd. | CHINA |
| Gold | Linglong Gold mine | CHINA |
| Gold | L'Orfebre S.A. | ANDORRA |
| Gold | LS-Nikko Copper Inc | KOREA, REPUBLIC OF |
| Gold | Luoyang Zijin Yinhui Gold Refinery Co., Ltd. | CHINA |
| Gold | Materion | USA |
| Gold | Matsuda Sangyo Co. Ltd | JAPAN |
| Gold | Metalor Technologies (Hong Kong) Ltd. | CHINA |
| Gold | Metalor Technologies (Singapore) Pte., Ltd. | SINGAPORE |
| Gold | Metalor Technologies (Suzhou) Ltd. | CHINA |
| Gold | Metalor Technologies S.A. | SWITZERLAND |
| Gold | Metalor USA Refining Corporation | USA |
| Gold | Metalúrgica Met-Mex Peñoles S.A. De C.V. | MEXICO |
| Gold | Mitsubishi Materials Corporation | JAPAN |
| Gold | Mitsui Mining and Smelting Co., Ltd. | JAPAN |
| Gold | MMTC-PAMP India Pvt., Ltd. | INDIA |
| Gold | Modeltech Sdn Bhd | MALAYSIA |
| Gold | Morris and Watson | NEW ZEALAND |
| Gold | Morris and Watson Gold Coast | AUSTRALIA |
| Gold | Moscow Special Alloys Processing Plant | RUSSIAN FEDERATION |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.Ş. | TURKEY |
| Gold | Navoi Mining and Metallurgical Combinat | UZBEKISTAN |
| Gold | Nihon Material Co. LTD | JAPAN |
| Gold | Ögussa Österreichische Gold- und Silber-Scheideanstalt GmbH | AUSTRIA |
| Gold | Ohura Precious Metal Industry Co., Ltd. | JAPAN |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | RUSSIAN FEDERATION |
| Gold | OJSC Kolyma Refinery | RUSSIAN FEDERATION |

| | | |
|------|---------------------------------------------------------|---------------------------|
| Gold | OJSC Novosibirsk Refinery | RUSSIAN FEDERATION |
| Gold | PAMP S.A. | SWITZERLAND |
| Gold | Pan Pacific Copper Co. Ltd. | JAPAN |
| Gold | Pease & Curren | USA |
| Gold | Penglai Penggang Gold Industry Co., Ltd. | CHINA |
| Gold | Philippine Associated Smelting and Refining Corporation | PHILIPPINES |
| Gold | Prioksky Plant of Non-Ferrous Metals | RUSSIAN FEDERATION |
| Gold | PT Aneka Tambang (Persero) Tbk | INDONESIA |
| Gold | PX Précinox S.A. | SWITZERLAND |
| Gold | Rand Refinery (Pty) Ltd. | SOUTH AFRICA |
| Gold | Remondis Argentia B.V. | NETHERLANDS |
| Gold | Republic Metals Corporation | USA |
| Gold | Rio Tinto Group | UNITED KINGDOM |
| Gold | Royal Canadian Mint | CANADA |
| Gold | SAAMP | FRANCE |
| Gold | Sabin Metal Corp. | USA |
| Gold | SAFINA A.S. | CZECH REPUBLIC |
| Gold | Sai Refinery | INDIA |
| Gold | Samduck Precious Metals | KOREA (REPUBLIC OF) |
| Gold | Samwon Metals Corp. | KOREA (REPUBLIC OF) |
| Gold | SAXONIA Edelmetalle GmbH | GERMANY |
| Gold | Schone Edelmetaal B.V. | NETHERLANDS |
| Gold | SEMPSA Joyeria Plateria S.A. | SPAIN |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | CHINA |
| Gold | Shandong Yanggu Xiangguang Co. Ltd. | CHINA |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co. Ltd | CHINA |
| Gold | Sichuan Tianze Precious Metals Co., Ltd. | CHINA |
| Gold | Singway Technology Co., Ltd. | TAIWAN, PROVINCE OF CHINA |
| Gold | So Accurate Group, Inc. | USA |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals | RUSSIAN FEDERATION |
| Gold | Solar Applied Materials Technology Corp. | TAIWAN, PROVINCE OF CHINA |
| Gold | Sudan Gold Refinery | SUDAN |
| Gold | Sumitomo Metal Mining Co. Ltd. | JAPAN |
| Gold | Sungeel Hitech Co., Ltd. | KOREA, REPUBLIC OF |
| Gold | T.C.A S.p.A | ITALY |
| Gold | Tanaka Kikinzoku Kogyo K.K. | JAPAN |
| Gold | The Refinery of Shandong Gold Mining Co. Ltd | CHINA |
| Gold | Tokuriki Honten Co. Ltd | JAPAN |
| Gold | Tongling Nonferrous Metals Group Co., Ltd. | CHINA |
| Gold | Tony Goetz NV | BELGIUM |
| Gold | TOO Tau-Ken-Altyn | KAZAKHSTAN |
| Gold | Torecom | KOREA (REPUBLIC OF) |
| Gold | Umicore Brasil Ltda. | BRAZIL |
| Gold | Umicore Precious Metals Thailand | THAILAND |
| Gold | Umicore S.A. Business Unit Precious Metals Refining | BELGIUM |
| Gold | United Precious Metal Refining, Inc. | USA |
| Gold | Universal Precious Metals Refining Zambia | ZAMBIA |
| Gold | Valcambi S.A. | SWITZERLAND |

| | | |
|----------|------------------------------------------------------|---------------------------------------------|
| Gold | Western Australian Mint trading as The Perth Mint | AUSTRALIA |
| Gold | WIELAND Edelmetalle GmbH | GERMANY |
| Gold | Yamamoto Precious Metal Co., Ltd. | JAPAN |
| Gold | Yokohama Metal Co Ltd | JAPAN |
| Gold | Yunnan Copper Industry Co., Ltd. | CHINA |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | CHINA |
| Gold | Zijin Mining Group Co., Ltd. Gold Refinery | CHINA |
| Tantalum | Arroz | JAPAN |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd. | CHINA |
| Tantalum | Conghua Tantalum and Niobium Smeltry | CHINA |
| Tantalum | D Block Metals, LLC | USA |
| Tantalum | Duoluoshan | CHINA |
| Tantalum | E.S.R. Electronics | USA |
| Tantalum | Exotech Inc. | USA |
| Tantalum | F&X Electro-Materials Ltd. | CHINA |
| Tantalum | FIR Metals & Resource Ltd. | CHINA |
| Tantalum | GAM | AUSTRALIA |
| Tantalum | Global Advanced Metals Aizu | JAPAN |
| Tantalum | Global Advanced Metals Boyertown | USA |
| Tantalum | GTP Corp. | USA |
| Tantalum | Guangdong Zhiyuan New Material Co., Ltd. | CHINA |
| Tantalum | Guizhou Zhenhua Xinyun Technology Ltd., Kaili branch | CHINA |
| Tantalum | H.C. Starck Co., Ltd. | THAILAND |
| Tantalum | H.C. Starck GmbH Goslar | GERMANY |
| Tantalum | H.C. Starck GmbH Laufenburg | GERMANY |
| Tantalum | H.C. Starck Hermsdorf GmbH | GERMANY |
| Tantalum | H.C. Starck Inc. | USA |
| Tantalum | H.C. Starck Ltd. | JAPAN |
| Tantalum | H.C. Starck Smelting GmbH & Co. KG | GERMANY |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd. | CHINA |
| Tantalum | Hi-Temp Specialty Metals, Inc. | USA |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd. | CHINA |
| Tantalum | Jiangxi Tuohong New Raw Material | CHINA |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd. | CHINA |
| Tantalum | Jiujiang Tanbre Co., Ltd. | CHINA |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd. | CHINA |
| Tantalum | KEMET Blue Metals | MEXICO |
| Tantalum | KEMET Blue Powder | USA |
| Tantalum | King-Tan Tantalum Industry Ltd. | CHINA |
| Tantalum | LSM Brasil S.A. | BRAZIL |
| Tantalum | Metallurgical Products India Pvt., Ltd. | INDIA |
| Tantalum | Mineração Taboca S.A. | BRAZIL |
| Tantalum | Mitsui Mining & Smelting | JAPAN |
| Tantalum | Molycorp Silmet A.S. | ESTONIA |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd. | CHINA |
| Tantalum | Pan Pacific Copper Co. Ltd. | JAPAN |
| Tantalum | Plansee SE Liezen | AUSTRIA |
| Tantalum | Plansee SE Reutte | AUSTRIA |
| Tantalum | Power Resources Ltd. | MACEDONIA (THE FORMER YUGOSLAV REPUBLIC OF) |

| | | |
|----------|---------------------------------------------------------------------------------------|----------------------------------|
| Tantalum | QuantumClean | USA |
| Tantalum | Resind Indústria e Comércio Ltda. | BRAZIL |
| Tantalum | RFH Tantalum Smeltry Co., Ltd. | CHINA |
| Tantalum | Solikamsk Magnesium Works OAO | RUSSIAN FEDERATION |
| Tantalum | Taki Chemical Co., Ltd. | JAPAN |
| Tantalum | Telex Metals | USA |
| Tantalum | Tranzact, Inc. | USA |
| Tantalum | Ulba Metallurgical Plant JSC | KAZAKHSTAN |
| Tantalum | WBH AG | AUSTRIA |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd. | CHINA |
| Tantalum | Yichun Jin Yang Rare Metal Co., Ltd. | CHINA |
| Tantalum | Zhuzhou Cemented Carbide | CHINA |
| Tin | 5NPLUS | CANADA |
| Tin | Alpha | USA |
| Tin | An Thai Minerals Co., Ltd. | VIETNAM |
| Tin | An Vinh Joint Stock Mineral Processing Company | VIETNAM |
| Tin | Aoki Laboratories Ltd. | USA |
| Tin | Baslini Tin Srl | ITALY |
| Tin | Brand IMLI | INDONESIA |
| Tin | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | CHINA |
| Tin | China Tin Group Co., Ltd. | CHINA |
| Tin | CINTAS METALICAS S.A | SPAIN |
| Tin | CNMC (Guangxi) PGMA Co. Ltd. | CHINA |
| Tin | Cofermetal Spa | ITALY |
| Tin | Complejo Metalurgico Vinto S.A. | BOLIVIA |
| Tin | Cooperativa Metalurgica de Rondônia Ltda. | BRAZIL |
| Tin | CV Ayi Jaya | INDONESIA |
| Tin | CV Dua Sekawan | INDONESIA |
| Tin | CV Gita Pesona | INDONESIA |
| Tin | CV JusTindo | INDONESIA |
| Tin | CV Makmur Jaya | INDONESIA |
| Tin | CV Nurjanah | INDONESIA |
| Tin | CV Serumpun Sebalai | INDONESIA |
| Tin | CV Tiga Sekawan | INDONESIA |
| Tin | CV United Smelting | INDONESIA |
| Tin | CV Venus Inti Perkasa | INDONESIA |
| Tin | Dowa | JAPAN |
| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | VIETNAM |
| Tin | Elmet S.A. de C.V. | MEXICO |
| Tin | Elmet S.L.U. | SPAIN |
| Tin | EM Vinto | BOLIVIA (PLURINATIONAL STATE OF) |
| Tin | Estanho de Rondônia S.A. | BRAZIL |
| Tin | Feinhütte Halsbrücke GmbH | GERMANY |
| Tin | Fenix Metals | POLAND |
| Tin | Gejiu Non-Ferrous Metal Processing Co. Ltd. | CHINA |
| Tin | Gejiu Fengming Metallurgy Chemical Plant | CHINA |
| Tin | Gejiu Jinye Mineral Company | CHINA |

| | | |
|-----|----------------------------------------------------------------|----------------------------------|
| Tin | Gejiu Kai Meng Industry and Trade LLC | CHINA |
| Tin | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | CHINA |
| Tin | Gejiu Zi-Li | CHINA |
| Tin | Gold Bell Group | CHINA |
| Tin | Guanyang Guida Nonferrous Metal Smelting Plant | CHINA |
| Tin | H. Kramer & Co. | USA |
| Tin | HuiChang Hill Tin Industry Co., Ltd. | CHINA |
| Tin | Huichang Jinshunda Tin Co. Ltd | CHINA |
| Tin | Impag AG | SWITZERLAND |
| Tin | Imperial Zinc | USA |
| Tin | Indonesian State Tin Corporation | INDONESIA |
| Tin | Indra Eramulti Logam | INDONESIA |
| Tin | Jean Goldschmidt International SA | BELGIUM |
| Tin | Jiangxi Ketai Advanced Material Co., Ltd. | CHINA |
| Tin | Jiangxi Shunda Huichang Kam Tin Co., Ltd. | CHINA |
| Tin | Linwu Xianggui Ore Smelting Co., Ltd. | CHINA |
| Tin | Magnu's Minerais Metais e Ligas Ltda. | BRAZIL |
| Tin | Malaysia Smelting Corporation (MSC) | MALAYSIA |
| Tin | Medeko Cast S.R.O. | SLOVAKIA (SLOVAK REPUBLIC) |
| Tin | Melt Metais e Ligas S.A. | BRAZIL |
| Tin | METALLIC MATERIALS BRANCH L OF GUANGXI CHINA TIN GROUP CO.,LTD | CHINA |
| Tin | Metallic Resources, Inc. | USA |
| Tin | Metallo-Chimique N.V. | BELGIUM |
| Tin | Metallum Metal Trading Company | SWITZERLAND |
| Tin | Mineração Taboca S.A. | BRAZIL |
| Tin | Minmetals Ganzhou Tin Co. Ltd. | CHINA |
| Tin | Minsur | PERU |
| Tin | Mitsubishi Materials Corporation | JAPAN |
| Tin | Modeltech Sdn Bhd | MALAYSIA |
| Tin | Nankang Nanshan Tin Manufactory Co., Ltd. | CHINA |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company | VIETNAM |
| Tin | Northern Smelter | AUSTRALIA |
| Tin | Novosibirsk Integrated Tin Works | RUSSIAN FEDERATION |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd. | THAILAND |
| Tin | O.M. Manufacturing Philippines, Inc. | PHILIPPINES |
| Tin | Operaciones Metalurgical S.A. | BOLIVIA (PLURINATIONAL STATE OF) |
| Tin | Phoenix Metal Ltd. | RWANDA |
| Tin | PT Alam Lestari Kencana | INDONESIA |
| Tin | PT Aries Kencana Sejahtera | INDONESIA |
| Tin | PT Artha Cipta Langgeng | INDONESIA |
| Tin | PT Artha Cipta Langgeng | INDONESIA |
| Tin | PT ATD Makmur Mandiri Jaya | INDONESIA |
| Tin | PT Babel Inti Perkasa | INDONESIA |
| Tin | PT Bangka Kudai Tin | INDONESIA |
| Tin | PT Bangka Prima Tin | INDONESIA |
| Tin | PT Bangka Putra Karya | INDONESIA |
| Tin | PT Bangka Timah Utama Sejahtera | INDONESIA |

| | | |
|-----|---------------------------------------------------------|-----------|
| Tin | PT Bangka Tin Industry | INDONESIA |
| Tin | PT Belitung Industri Sejahtera | INDONESIA |
| Tin | PT Belitung Industri Sejahtera | INDONESIA |
| Tin | PT BilliTin Makmur Lestari | INDONESIA |
| Tin | PT BilliTin Makmur Lestari | INDONESIA |
| Tin | PT Bukit Timah | INDONESIA |
| Tin | PT Cipta Persada Mulia | INDONESIA |
| Tin | PT DS Jaya Abadi | INDONESIA |
| Tin | PT Eunindo Usaha Mandiri | INDONESIA |
| Tin | PT Fang Di MulTindo | INDONESIA |
| Tin | PT HP Metals Indonesia | INDONESIA |
| Tin | PT Inti Stania Prima | INDONESIA |
| Tin | PT Karimun Mining | INDONESIA |
| Tin | PT Kijang Jaya Mandiri | INDONESIA |
| Tin | PT Koba Tin | INDONESIA |
| Tin | PT Lautan Harmonis Sejahtera | INDONESIA |
| Tin | PT Menara Cipta Mulia | INDONESIA |
| Tin | PT Mitra Stania Prima | INDONESIA |
| Tin | PT O.M. Indonesia | INDONESIA |
| Tin | PT Panca Mega Persada | INDONESIA |
| Tin | PT Prima Timah Utama | INDONESIA |
| Tin | PT Refined Bangka Tin | INDONESIA |
| Tin | PT Sariwiguna Binasentosa | INDONESIA |
| Tin | PT Seirama Tin Investment | INDONESIA |
| Tin | PT Stanindo Inti Perkasa | INDONESIA |
| Tin | PT Sukses Inti Makmur | INDONESIA |
| Tin | PT Sumber Jaya Indah | INDONESIA |
| Tin | PT Sumber Jaya Indah | INDONESIA |
| Tin | PT Timah (Persero) Tbk Kundur | INDONESIA |
| Tin | PT Timah (Persero) Tbk Mentok | INDONESIA |
| Tin | PT Timah Nusantara | INDONESIA |
| Tin | PT Tinindo Inter Nusa | INDONESIA |
| Tin | PT Tirus Putra Mandiri | INDONESIA |
| Tin | PT Tommy Utama | INDONESIA |
| Tin | PT Wahana Perkit Jaya | INDONESIA |
| Tin | Resind Indústria e Comércio Ltda. | BRAZIL |
| Tin | Rui Da Hung | TAIWAN |
| Tin | Senju Metal Industry Co., Ltd. | MALAYSIA |
| Tin | Soft Metais Ltda. | BRAZIL |
| Tin | Super Dragon Technology Co. Ltd. | TAIWAN |
| Tin | Super Ligas | BRAZIL |
| Tin | Thaisarco | THAILAND |
| Tin | Thaisarco | THAILAND |
| Tin | Tuyen Quang Non-Ferrous Metals Joint Stock Company | VIETNAM |
| Tin | Uni Bros Metal Pte Ltd | SINGAPORE |
| Tin | VQB Mineral and Trading Group JSC | VIETNAM |
| Tin | Walcownia Metali Nieżelaznych "LABĘDY" S.A. w Gliwicach | POLAND |
| Tin | White Solder Metalurgia e Mineração Ltda. | BRAZIL |
| Tin | Xianghualing Tin Industry Co., Ltd. | CHINA |
| Tin | Xinmao Xiye (Tin Company) | CHINA |

| | | |
|----------|---------------------------------------------------------------|--------------------|
| Tin | Yunnan Chengfeng | CHINA |
| Tin | Yunnan Gejiu Jinye Minerals | CHINA |
| Tin | Yunnan Tin Company Limited | CHINA |
| Tin | Zhongshan Jinye Smelting Co., Ltd | CHINA |
| Tungsten | A.L.M.T. TUNGSTEN Corp. | JAPAN |
| Tungsten | ACL Metais Eireli | BRAZIL |
| Tungsten | Asia Tungsten Products Vietnam Ltd. | VIETNAM |
| Tungsten | ATI Metalworking Products | USA |
| Tungsten | Buffalo Tungsten | USA |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd. | CHINA |
| Tungsten | China Minmetals | CHINA |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd. | CHINA |
| Tungsten | Dayu Jincheng Tungsten Industry Co., Ltd. | CHINA |
| Tungsten | Dayu Weiliang Tungsten Co., Ltd. | CHINA |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd. | CHINA |
| Tungsten | Ganxian Shirui New Material Co., Ltd. | CHINA |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd. | CHINA |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd. | CHINA |
| Tungsten | Ganzhou Non-ferrous Metals Smelting Co., Ltd. | CHINA |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd. | CHINA |
| Tungsten | Ganzhou Yatai Tungsten Co., Ltd. | CHINA |
| Tungsten | Global Tungsten & Powders Corp. | USA |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd. | CHINA |
| Tungsten | H.C. Starck GmbH | GERMANY |
| Tungsten | H.C. Starck Smelting GmbH & Co.KG | GERMANY |
| Tungsten | Hunan Chenzhou Mining Co., Ltd. | CHINA |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji | CHINA |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Yanglin | CHINA |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd. | CHINA |
| Tungsten | Hydrometallurg, JSC | RUSSIAN FEDERATION |
| Tungsten | Japan New Metals Co., Ltd. | JAPAN |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd. | CHINA |
| Tungsten | Jiangxi Dayu Longxintai Tungsten Co., Ltd. | CHINA |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd. | CHINA |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. | CHINA |
| Tungsten | Jiangxi Rare Earth & Rare Metals Tungsten Group Corp | CHINA |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | CHINA |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd. | CHINA |
| Tungsten | Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd. | CHINA |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd. | CHINA |
| Tungsten | Kennametal Fallon | USA |
| Tungsten | Kennametal Huntsville | USA |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd. | CHINA |
| Tungsten | Moliren Ltd | RUSSIAN FEDERATION |
| Tungsten | Niagara Refining LLC | USA |
| Tungsten | Nippon Tungsten (Shanghai) Commerce Co., Ltd. | JAPAN |
| Tungsten | Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC | VIETNAM |
| Tungsten | Philippine Chuangxin Industrial Co., Inc. | PHILIPPINES |
| Tungsten | Pobedit, JSC | RUSSIAN FEDERATION |
| Tungsten | Sanher Tungsten Vietnam Co., Ltd. | VIETNAM |

| | | |
|----------|--------------------------------------------------------------|---------------------|
| Tungsten | South-East Nonferrous Metal Company Limited of Hengyang City | CHINA |
| Tungsten | TaeguTec Ltd. | KOREA, REPUBLIC OF |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd. | VIETNAM |
| Tungsten | Unecha Refractory metals plant | RUSSIAN FEDERATION |
| Tungsten | Vietnam Youngsun Tungsten Industry Co., Ltd. | VIETNAM |
| Tungsten | Wolfram Bergbau und Hütten AG | AUSTRIA |
| Tungsten | Wolfram Company CJSC | RUSSIAN FEDERATION |
| Tungsten | Woltech Korea Co., Ltd. | KOREA (REPUBLIC OF) |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd. | CHINA |
| Tungsten | Xiamen Tungsten Co., Ltd | CHINA |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd. | CHINA |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd. | CHINA |
| Tungsten | Zhuzhou Cemented Carbide Group Co Ltd | CHINA |

ANNEX II

Countries of origin of the subject minerals these facilities process are believed to include:

Andorra, Australia, Austria, Belgium, Bolivia, Brazil, Canada, Chile, China, Czech Republic, Estonia, France, Germany, India, Indonesia, Italy, Japan, Kazakhstan, Korea (Republic of), Kyrgyzstan, Macedonia, Malaysia, Mexico, Netherlands, New Zealand, Norway, Peru, Philippines, Poland, Russian Federation, Rwanda, Saudi Arabia, Singapore, South Africa, Spain, Sudan, Sweden, Switzerland, Taiwan, Thailand, Turkey, United Arab Emirates, United Kingdom, USA, Uzbekistan, Vietnam, Zambia, Zimbabwe

ANNEX III

| Subject Mineral | Tin | Tantalum | Tungsten | Gold |
|--------------------------------------------------|-----|----------|----------|------|
| Number of smelters identified by Sevcon | 117 | 54 | 60 | 166 |
| Number of compliant smelters in CFSI Program | 69 | 44 | 40 | 94 |
| Additional smelters active in CFSI audit program | 6 | 1 | 3 | 9 |

(CFSI data at May 15th, 2017)