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**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION**  
Washington, DC 20549

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**FORM SD**

**SPECIALIZED DISCLOSURE REPORT**

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**PCTEL, Inc.**

(Exact name of registrant as specified in its charter)

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

**000-27115**  
(Commission File  
Number)

**77-0364943**  
(IRS Employer  
Identification No.)

**471 Brighton Drive**  
**Bloomington, Illinois 60108**  
(Address of Principal Executive Offices, including Zip Code)

**Kevin J. McGowan (630) 372-6800**  
(Name and telephone number, including area code, of the person to contact in connection with this report)

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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 January 1 to December 31, 2020.

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## **Section 1 – Conflict Minerals Disclosure**

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

In accordance with Section 1502 of the Dodd-Frank Act, which added Section 13(p) to the Securities and Exchange Act of 1934, as amended, PCTEL, Inc. has filed this Specialized Disclosure Report on Form SD and Conflict Mineral Report for the reporting period January 1, 2020 to December 31, 2020.

### **Item 1.02. Exhibit**

A copy of the Company's Conflict Minerals Report is provided as Exhibit 1.01 hereto and is publicly available along with the Company's Conflict Minerals Policy at [www.pctel.com](http://www.pctel.com) under Corporate Governance.

## **Section 2 – Exhibits**

### **Item 2.01. Exhibits**

Exhibit 1.01 – [Conflict Minerals Report](#)

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SIGNATURE

Pursuant to the requirements of the Securities Exchange Act of 1934, as amended, the Registrant has duly caused this report to be signed on its behalf by the undersigned hereunto duly authorized.

Date: June 1, 2021

PCTEL, INC.

By: /s/ Kevin J. McGowan  
Kevin J. McGowan, Chief Financial Officer

**CONFLICT MINERALS REPORT OF PCTEL, INC.  
IN ACCORDANCE WITH RULE 13P-1 UNDER THE SECURITIES EXCHANGE ACT OF 1934**

**Company Overview**

PCTEL, Inc. (“PCTEL” or “The Company” or “our”) is a leading global provider of wireless technology, including purpose-built Industrial Internet of Things (“IoT”) devices, antenna systems, and test and measurement solutions. The Company solves complex wireless challenges to help organizations stay connected, transform, and grow and accordingly, we have expertise in RF, digital and mechanical engineering. The Company has two businesses (antennas & Industrial IoT devices and test & measurement products) that address three market segments: Enterprise Wireless, Intelligent Transportation, and Industrial IoT. During 2020, the Company assembled its antennas and Industrial IoT devices at its facilities in Tianjin, China, and Bloomingdale, Illinois and at contract manufacturers in China and elsewhere. The Company performs final assembly of all test & measurement products at the Company’s facility in Clarksburg, Maryland.

The Company has determined that the following conflict minerals are necessary to the functionality or production of our products: solder (cassiterite), electrical capacitors (tantalum), electrical connectors (gold) and semiconductors (gold). In accordance with Rule 13p-1 under the Securities Exchange Act of 1934 (“Rule 13p-1”), the Company undertook due diligence to determine whether the necessary conflict minerals in the Company’s products were or were not “DRC conflict free”. This is the PCTEL’s Conflict Minerals Report of PCTEL for products for which manufacturing was completed during calendar year 2020 in accord with Rule 13p-1. Numerous terms in this Report are defined in Rule 13p-1 and Form SD and the reader is referred to those sources and to 1934 Act Release No. 34-67716 (August 22, 2012) for such definitions.

**Overview of Conflict Minerals Process and Reasonable Country of Origin Inquiry**

The Company’s conflict minerals due diligence program is designed to facilitate compliance with Dodd-Frank Section 1502 and Rule 13p-1. The Company has developed and implemented a reasonable and documented due diligence process, consistent with the Organisation for Economic Co-operation and Development (“OECD”) Guidelines, to determine the use, source, and origin of columbite-tantalite (also known as coltan), cassiterite, wolframite, gold and their derivatives tantalum, tin and tungsten (collectively, “3TG”) in our global product portfolio, and specifically, whether any of them originated in the Democratic Republic of the Congo or an adjoining country (collectively, the “Covered Countries”). Representatives from the Company’s Finance, Manufacturing Management, Supply Chain, and Quality teams participate in the Conflict Minerals Program and support compliance. In addition, the Company utilizes a qualified independent third-party provider to assist with identifying and surveying suppliers, and to provide additional data collection and data analysis assistance.

The Company communicates to its suppliers and the public the Company’s DRC Conflict Free Sourcing Policy for the supply chain of minerals originating from Conflict-Affected and High-Risk Areas. The Company’s policy can be found at [www.pctel.com](http://www.pctel.com).

The Company maintains internal standard operating procedures that provide a process to be followed in order to generate and maintain the information needed to comply with Dodd-Frank Section 1502.

Suppliers are assessed as part of a vendor due diligence and compliance assessment program. Suppliers identified as providing parts to the Company that include conflict minerals are tracked through an information system that captures and categorizes supplier and product information.

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## **EXHIBIT 1.01**

The Company conducted a reasonable country of origin inquiry (“RCOI”) by circulating a supply-chain survey with direct suppliers of components that contain conflict minerals using the Conflict Minerals Reporting Template (“CMRT”). The purpose of this supplier survey was to identify, if possible, the supply chain, including smelters and refiners who contribute refined conflict minerals to the Company’s products. The Company made follow-up inquiries to obtain as much needed information as possible from as many suppliers as possible. Supplier responses were validated by evaluating the consistency of responses with other response and information known about supplies and suppliers.

The Company compared the smelters and refiners identified by direct suppliers via the supply-chain survey against the list of smelter facilities that have received a “conflict free” designation by participating in an independent third-party smelter audit.

### **Due Diligence Results**

The Company received responses from 49% of the vendors surveyed. Based on information provided in vendor surveys, we believe the facilities used to process the necessary 3TG in our products include 332 different smelters or refiners (“SORs”). Those SORs and their respective country locations are set forth in Appendix A to this Conflict Minerals Report. Based on review of the RMI SOR database, 237 of these SORs are Responsible Minerals Assurance Process (RMAP) conformant, which accounts for approximately 71% of the 332 SORs. The Company intends to continue to encourage those vendors who currently source 3TG from SORs that are not RMAP Conformant to transition to RMAP Conformant SORs or request the SORs they use to become RMAP Conformant.

### **Risk Mitigation/Future Due Diligence Measures**

The Company has a continuous improvement plan that describes steps taken to mitigate the risks that its acquisition of necessary conflict minerals necessary to produce its products will benefit armed groups in the Covered Countries. Included in these are the following steps. The plan includes the following steps, among others, to continue to improve our due diligence measures:

- Continue to assess the risks in our supply chain of conflict minerals sourced from the Covered Countries
  - Continue to work with third-party service providers to review and validate our supplier responses
  - Continue to influence our vendors to encourage the use of RMAP and other compliant sources
  - Continue to monitor supply chain developments in the Covered Countries, as well as other similar supply chain issues, and SOR improvements
  - Engage suppliers during the year to communicate expectations
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## Appendix A

<b>Metal</b>	<b>Standard Smelter Name</b>	<b>Smelter Facility Location</b>	<b>Smelt</b>
Gold	8853 S.p.A.	ITALY	CID00
Gold	Abington Reldan Metals, LLC	UNITED STATES OF AMERICA	CID00
Gold	Advanced Chemical Company	UNITED STATES OF AMERICA	CID00
Gold	African Gold Refinery	UGANDA	CID00
Gold	Aida Chemical Industries Co., Ltd.	JAPAN	CID00
Gold	Al Etihad Gold Refinery DMCC	UNITED ARAB EMIRATES	CID00
Gold	Alexy Metals	UNITED STATES OF AMERICA	CID00
Gold	Allgemeine Gold-und Silberscheideanstalt A.G.	GERMANY	CID00
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN	CID00
Gold	AngloGold Ashanti Corrego do Sitio Mineracao	BRAZIL	CID00
Gold	Argor-Heraeus S.A.	SWITZERLAND	CID00
Gold	Asahi Pretec Corp.	JAPAN	CID00
Gold	Asahi Refining Canada Ltd.	CANADA	CID00
Gold	Asahi Refining USA Inc.	UNITED STATES OF AMERICA	CID00
Gold	Asaka Riken Co., Ltd.	JAPAN	CID00
Gold	Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	TURKEY	CID00
Gold	AU Traders and Refiners	SOUTH AFRICA	CID00
Gold	Augmont Enterprises Private Limited	INDIA	CID00
Gold	Aurubis AG	GERMANY	CID00
Gold	Bangalore Refinery	INDIA	CID00
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES	CID00
Gold	Boliden AB	SWEDEN	CID00
Gold	C. Hafner GmbH + Co. KG	GERMANY	CID00
Gold	C.I Metales Procesados Industriales SAS	COLOMBIA	CID00
Gold	Caridad	MEXICO	CID00
Gold	CCR Refinery - Glencore Canada Corporation	CANADA	CID00
Gold	Cendres + Metaux S.A.	SWITZERLAND	CID00
Gold	CGR Metalloys Pvt Ltd.	INDIA	CID00
Gold	Chimet S.p.A.	ITALY	CID00
Gold	Chugai Mining	JAPAN	CID00

**EXHIBIT 1.01**

Gold	Daye Non-Ferrous Metals Mining Ltd.	CHINA	CID00
Gold	Degussa Sonne / Mond Goldhandel GmbH	GERMANY	CID00
Gold	Dijllah Gold Refinery FZC	UNITED ARAB EMIRATES	CID00
Gold	DODUCO Contacts and Refining GmbH	GERMANY	CID00
Gold	Dowa	JAPAN	CID00
Gold	DS PRETECH Co., Ltd.	KOREA, REPUBLIC OF	CID00
Gold	DSC (Do Sung Corporation)	KOREA, REPUBLIC OF	CID00
Gold	Eco-System Recycling Co., Ltd. East Plant	JAPAN	CID00
Gold	Eco-System Recycling Co., Ltd. North Plant	JAPAN	CID00
Gold	Eco-System Recycling Co., Ltd. West Plant	JAPAN	CID00
Gold	Emerald Jewel Industry India Limited (Unit 1)	INDIA	CID00
Gold	Emerald Jewel Industry India Limited (Unit 2)	INDIA	CID00
Gold	Emerald Jewel Industry India Limited (Unit 3)	INDIA	CID00
Gold	Emerald Jewel Industry India Limited (Unit 4)	INDIA	CID00
Gold	Emirates Gold DMCC	UNITED ARAB EMIRATES	CID00
Gold	Fidelity Printers and Refiners Ltd.	ZIMBABWE	CID00
Gold	Fujairah Gold FZC	UNITED ARAB EMIRATES	CID00
Gold	GCC Gujrat Gold Centre Pvt. Ltd.	INDIA	CID00
Gold	Geib Refining Corporation	UNITED STATES OF AMERICA	CID00
Gold	Gold Coast Refinery	GHANA	CID00
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CHINA	CID00
Gold	Great Wall Precious Metals Co., Ltd. of CBPM	CHINA	CID00
Gold	Guangdong Jinding Gold Limited	CHINA	CID00
Gold	Guoda Safina High-Tech Environmental Refinery Co., Ltd.	CHINA	CID00
Gold	Hangzhou Fuchunjiang Smelting Co., Ltd.	CHINA	CID00
Gold	Heimerle + Meule GmbH	GERMANY	CID00
Gold	Heraeus Metals Hong Kong Ltd.	CHINA	CID00
Gold	Heraeus Precious Metals GmbH & Co. KG	GERMANY	CID00
Gold	Hunan Chenzhou Mining Co., Ltd.	CHINA	CID00
Gold	Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd.	CHINA	CID00
Gold	HwaSeong CJ CO., LTD.	KOREA, REPUBLIC OF	CID00

**EXHIBIT 1.01**

Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CHINA	CID00
Gold	International Precious Metal Refiners	UNITED ARAB EMIRATES	CID00
Gold	Ishifuku Metal Industry Co., Ltd.	JAPAN	CID00
Gold	Istanbul Gold Refinery	TURKEY	CID00
Gold	Italpreziosi	ITALY	CID00
Gold	JALAN & Company	INDIA	CID00
Gold	Japan Mint	JAPAN	CID00
Gold	Jiangxi Copper Co., Ltd.	CHINA	CID00
Gold	JSC Ekaterinburg Non-Ferrous Metal Processing Plant	RUSSIAN FEDERATION	CID00
Gold	JSC Uralelectromed	RUSSIAN FEDERATION	CID00
Gold	JX Nippon Mining & Metals Co., Ltd.	JAPAN	CID00
Gold	K.A. Rasmussen	NORWAY	CID00
Gold	Kaloti Precious Metals	UNITED ARAB EMIRATES	CID00
Gold	Kazakhmys Smelting LLC	KAZAKHSTAN	CID00
Gold	Kazzinc	KAZAKHSTAN	CID00
Gold	Kennecott Utah Copper LLC	UNITED STATES OF AMERICA	CID00
Gold	KGHM Polska Miedz Spolka Akcyjna	POLAND	CID00
Gold	Kojima Chemicals Co., Ltd.	JAPAN	CID00
Gold	Korea Zinc Co., Ltd.	KOREA, REPUBLIC OF	CID00
Gold	Kundan Care Products Ltd.	INDIA	CID00
Gold	Kyrgyzaltyn JSC	KYRGYZSTAN	CID00
Gold	Kyshtym Copper-Electrolytic Plant ZAO	RUSSIAN FEDERATION	CID00
Gold	L'azurde Company For Jewelry	SAUDI ARABIA	CID00
Gold	Lingbao Gold Co., Ltd.	CHINA	CID00
Gold	Lingbao Jinyuan Tonghui Refinery Co., Ltd.	CHINA	CID00
Gold	L'Orfebre S.A.	ANDORRA	CID00
Gold	LS-NIKKO Copper Inc.	KOREA, REPUBLIC OF	CID00
Gold	LT Metal Ltd.	KOREA, REPUBLIC OF	CID00
Gold	Luoyang Zijin Yinhui Gold Refinery Co., Ltd.	CHINA	CID00
Gold	Marsam Metals	BRAZIL	CID00
Gold	Materion	UNITED STATES OF AMERICA	CID00



**EXHIBIT 1.01**

Gold	Matsuda Sangyo Co., Ltd.	JAPAN	CID00
Gold	MD Overseas	INDIA	CID00
Gold	Metal Concentrators SA (Pty) Ltd.	SOUTH AFRICA	CID00
Gold	Metallix Refining Inc.	UNITED STATES OF AMERICA	CID00
Gold	Metalor Technologies (Hong Kong) Ltd.	CHINA	CID00
Gold	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE	CID00
Gold	Metalor Technologies (Suzhou) Ltd.	CHINA	CID00
Gold	Metalor Technologies S.A.	SWITZERLAND	CID00
Gold	Metalor USA Refining Corporation	UNITED STATES OF AMERICA	CID00
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	MEXICO	CID00
Gold	Mitsubishi Materials Corporation	JAPAN	CID00
Gold	Mitsui Mining and Smelting Co., Ltd.	JAPAN	CID00
Gold	MMTC-PAMP India Pvt., Ltd.	INDIA	CID00
Gold	Modeltech Sdn Bhd	MALAYSIA	CID00
Gold	Morris and Watson	NEW ZEALAND	CID00
Gold	Moscow Special Alloys Processing Plant	RUSSIAN FEDERATION	CID00
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	TURKEY	CID00
Gold	Navoi Mining and Metallurgical Combinat	UZBEKISTAN	CID00
Gold	NH Recytech Company	KOREA, REPUBLIC OF	CID00
Gold	Nihon Material Co., Ltd.	JAPAN	CID00
Gold	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	AUSTRIA	CID00
Gold	Ohura Precious Metal Industry Co., Ltd.	JAPAN	CID00
Gold	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	RUSSIAN FEDERATION	CID00
Gold	OJSC Novosibirsk Refinery	RUSSIAN FEDERATION	CID00
Gold	PAMP S.A.	SWITZERLAND	CID00
Gold	Pease & Curren	UNITED STATES OF AMERICA	CID00
Gold	Penglai Penggang Gold Industry Co., Ltd.	CHINA	CID00
Gold	Planta Recuperadora de Metales SpA	CHILE	CID00
Gold	Prioksky Plant of Non-Ferrous Metals	RUSSIAN FEDERATION	CID00
Gold	PT Aneka Tambang (Persero) Tbk	INDONESIA	CID00

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**EXHIBIT 1.01**

Gold	PX Precinox S.A.	SWITZERLAND	CID00
Gold	QG Refining, LLC	UNITED STATES OF AMERICA	CID00
Gold	Rand Refinery (Pty) Ltd.	SOUTH AFRICA	CID00
Gold	Refinery of Seemine Gold Co., Ltd.	CHINA	CID00
Gold	REMONDIS PMR B.V.	NETHERLANDS	CID00
Gold	Royal Canadian Mint	CANADA	CID00
Gold	SAAMP	FRANCE	CID00
Gold	Sabin Metal Corp.	UNITED STATES OF AMERICA	CID00
Gold	Safimet S.p.A	ITALY	CID00
Gold	SAFINA A.S.	CZECH REPUBLIC	CID00
Gold	Sai Refinery	INDIA	CID00
Gold	Samduck Precious Metals	KOREA, REPUBLIC OF	CID00
Gold	Samwon Metals Corp.	KOREA, REPUBLIC OF	CID00
Gold	Sancus ZFS (L'Orfebre, SA)	COLOMBIA	CID00
Gold	SAXONIA Edelmetalle GmbH	GERMANY	CID00
Gold	Sellem Industries Ltd.	MAURITANIA	CID00
Gold	SEMPSA Joyeria Plateria S.A.	SPAIN	CID00
Gold	Shandong Humon Smelting Co., Ltd.	CHINA	CID00
Gold	Shandong Tiancheng Biological Gold Industrial Co., Ltd.	CHINA	CID00
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CHINA	CID00
Gold	Shenzhen Zhonghenglong Real Industry Co., Ltd.	CHINA	CID00
Gold	Shirpur Gold Refinery Ltd.	INDIA	CID00
Gold	Sichuan Tianze Precious Metals Co., Ltd.	CHINA	CID00
Gold	Singway Technology Co., Ltd.	TAIWAN, PROVINCE OF CHINA	CID00
Gold	SOE Shyolkovsky Factory of Secondary Precious Metals	RUSSIAN FEDERATION	CID00
Gold	Solar Applied Materials Technology Corp.	TAIWAN, PROVINCE OF CHINA	CID00
Gold	Sovereign Metals	INDIA	CID00
Gold	State Research Institute Center for Physical Sciences and Technology	LITHUANIA	CID00
Gold	Sudan Gold Refinery	SUDAN	CID00
Gold	Sumitomo Metal Mining Co., Ltd.	JAPAN	CID00

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**EXHIBIT 1.01**

Gold	SungEel HiMetal Co., Ltd.	KOREA, REPUBLIC OF	CID00
Gold	T.C.A S.p.A	ITALY	CID00
Gold	Tanaka Kikinzoku Kogyo K.K.	JAPAN	CID00
Gold	The Refinery of Shandong Gold Mining Co., Ltd.	CHINA	CID00
Gold	Tokuriki Honten Co., Ltd.	JAPAN	CID00
Gold	Tongling Nonferrous Metals Group Co., Ltd.	CHINA	CID00
Gold	Tony Goetz NV	BELGIUM	CID00
Gold	TOO Tau-Ken-Altyn	KAZAKHSTAN	CID00
Gold	Torecom	KOREA, REPUBLIC OF	CID00
Gold	Umicore Precious Metals Thailand	THAILAND	CID00
Gold	Umicore S.A. Business Unit Precious Metals Refining	BELGIUM	CID00
Gold	United Precious Metal Refining, Inc.	UNITED STATES OF AMERICA	CID00
Gold	Valcambi S.A.	SWITZERLAND	CID00
Gold	Western Australian Mint (T/a The Perth Mint)	AUSTRALIA	CID00
Gold	WIELAND Edelmetalle GmbH	GERMANY	CID00
Gold	Yamakin Co., Ltd.	JAPAN	CID00
Gold	Yokohama Metal Co., Ltd.	JAPAN	CID00
Gold	Yunnan Copper Industry Co., Ltd.	CHINA	CID00
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA	CID00
Tantalum	Asaka Riken Co., Ltd.	JAPAN	CID00
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	CHINA	CID00
Tantalum	D Block Metals, LLC	UNITED STATES OF AMERICA	CID00
Tantalum	Exotech Inc.	UNITED STATES OF AMERICA	CID00
Tantalum	F&X Electro-Materials Ltd.	CHINA	CID00
Tantalum	FIR Metals & Resource Ltd.	CHINA	CID00
Tantalum	Global Advanced Metals Aizu	JAPAN	CID00
Tantalum	Global Advanced Metals Boyertown	UNITED STATES OF AMERICA	CID00
Tantalum	Guangdong Zhiyuan New Material Co., Ltd.	CHINA	CID00
Tantalum	H.C. Starck Co., Ltd.	THAILAND	CID00
Tantalum	H.C. Starck Hermsdorf GmbH	GERMANY	CID00
Tantalum	H.C. Starck Inc.	UNITED STATES OF AMERICA	CID00

**EXHIBIT 1.01**

Tantalum	H.C. Starck Ltd.	JAPAN	CID0
Tantalum	H.C. Starck Smelting GmbH & Co. KG	GERMANY	CID0
Tantalum	H.C. Starck Tantalum and Niobium GmbH	GERMANY	CID0
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA	CID0
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHINA	CID0
Tantalum	Jiangxi Tuohong New Raw Material	CHINA	CID0
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINA	CID0
Tantalum	Jiujiang Tanbre Co., Ltd.	CHINA	CID0
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA	CID0
Tantalum	KEMET Blue Metals	MEXICO	CID0
Tantalum	LSM Brasil S.A.	BRAZIL	CID0
Tantalum	Metallurgical Products India Pvt., Ltd.	INDIA	CID0
Tantalum	Mineracao Taboca S.A.	BRAZIL	CID0
Tantalum	Mitsui Mining and Smelting Co., Ltd.	JAPAN	CID0
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA	CID0
Tantalum	NPM Silmet AS	ESTONIA	CID0
Tantalum	PRG Dooel	NORTH MACEDONIA, REPUBLIC OF	CID0
Tantalum	QuantumClean	UNITED STATES OF AMERICA	CID0
Tantalum	Resind Industria e Comercio Ltda.	BRAZIL	CID0
Tantalum	Solikamsk Magnesium Works OAO	RUSSIAN FEDERATION	CID0
Tantalum	Taki Chemical Co., Ltd.	JAPAN	CID0
Tantalum	Telex Metals	UNITED STATES OF AMERICA	CID0
Tantalum	Ulba Metallurgical Plant JSC	KAZAKHSTAN	CID0
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	CHINA	CID0
Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	CHINA	CID0
Tin	Alpha	UNITED STATES OF AMERICA	CID0
Tin	An Vinh Joint Stock Mineral Processing Company	VIET NAM	CID0
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CHINA	CID0
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CHINA	CID0
Tin	China Tin Group Co., Ltd.	CHINA	CID0
Tin	CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda	BRAZIL	CID0

**EXHIBIT 1.01**

Tin	CRM Synergies	SPAIN	CID
Tin	CV Ayi Jaya	INDONESIA	CID
Tin	CV Venus Inti Perkasa	INDONESIA	CID
Tin	Dongguan CiEXPO Environmental Engineering Co., Ltd.	CHINA	CID
Tin	Dowa	JAPAN	CID
Tin	Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company	VIET NAM	CID
Tin	EM Vinto	BOLIVIA (PLURINATIONAL STATE OF)	CID
Tin	Estanho de Rondonia S.A.	BRAZIL	CID
Tin	Fenix Metals	POLAND	CID
Tin	Gejiu City Fuxiang Industry and Trade Co., Ltd.	CHINA	CID
Tin	Gejiu Fengming Metallurgy Chemical Plant	CHINA	CID
Tin	Gejiu Kai Meng Industry and Trade LLC	CHINA	CID
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA	CID
Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	CHINA	CID
Tin	Gejiu Zili Mining And Metallurgy Co., Ltd.	CHINA	CID
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CHINA	CID
Tin	HuiChang Hill Tin Industry Co., Ltd.	CHINA	CID
Tin	Jiangxi New Nanshan Technology Ltd.	CHINA	CID
Tin	Luna Smelter, Ltd.	RWANDA	CID
Tin	Ma'anshan Weitai Tin Co., Ltd.	CHINA	CID
Tin	Magnu's Minerai's Metais e Ligas Ltda.	BRAZIL	CID
Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA	CID
Tin	Melt Metais e Ligas S.A.	BRAZIL	CID
Tin	Metallic Resources, Inc.	UNITED STATES OF AMERICA	CID
Tin	Metallo Belgium N.V.	BELGIUM	CID
Tin	Metallo Spain S.L.U.	SPAIN	CID
Tin	Mineracao Taboca S.A.	BRAZIL	CID
Tin	Minsur	PERU	CID
Tin	Mitsubishi Materials Corporation	JAPAN	CID
Tin	Modeltech Sdn Bhd	MALAYSIA	CID
Tin	Nghe Tinh Non-Ferrous Metals Joint Stock Company	VIET NAM	CID
Tin	Novosibirsk Processing Plant Ltd.	RUSSIAN FEDERATION	CID

## EXHIBIT 1.01

Tin	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND	CID00
Tin	O.M. Manufacturing Philippines, Inc.	PHILIPPINES	CID00
Tin	Operaciones Metalurgicas S.A.	BOLIVIA (PLURINATIONAL STATE OF)	CID00
Tin	Pongpipat Company Limited	MYANMAR	CID00
Tin	Precious Minerals and Smelting Limited	INDIA	CID00
Tin	PT Aries Kencana Sejahtera	INDONESIA	CID00
Tin	PT Artha Cipta Langgeng	INDONESIA	CID00
Tin	PT ATD Makmur Mandiri Jaya	INDONESIA	CID00
Tin	PT Babel Inti Perkasa	INDONESIA	CID00
Tin	PT Babel Surya Alam Lestari	INDONESIA	CID00
Tin	PT Bangka Serumpun	INDONESIA	CID00
Tin	PT Bukit Timah	INDONESIA	CID00
Tin	PT Cipta Persada Mulia	INDONESIA	CID00
Tin	PT Lautan Harmonis Sejahtera	INDONESIA	CID00
Tin	PT Menara Cipta Mulia	INDONESIA	CID00
Tin	PT Mitra Stania Prima	INDONESIA	CID00
Tin	PT Mitra Sukses Globalindo	INDONESIA	CID00
Tin	PT Prima Timah Utama	INDONESIA	CID00
Tin	PT Rajawali Rimba Perkasa	INDONESIA	CID00
Tin	PT Rajehan Ariq	INDONESIA	CID00
Tin	PT Refined Bangka Tin	INDONESIA	CID00
Tin	PT Stanindo Inti Perkasa	INDONESIA	CID00
Tin	PT Sukses Inti Makmur	INDONESIA	CID00
Tin	PT Timah Nusantara	INDONESIA	CID00
Tin	PT Timah Tbk Kundur	INDONESIA	CID00
Tin	PT Timah Tbk Mentok	INDONESIA	CID00
Tin	PT Tinindo Inter Nusa	INDONESIA	CID00
Tin	Resind Industria e Comercio Ltda.	BRAZIL	CID00
Tin	Rui Da Hung	TAIWAN, PROVINCE OF CHINA	CID00
Tin	Soft Metais Ltda.	BRAZIL	CID00
Tin	Super Ligas	BRAZIL	CID00
Tin	Thai Nguyen Mining and Metallurgy Co., Ltd.	VIET NAM	CID00

## EXHIBIT 1.01

Tin	Thaisarco	THAILAND	CID00
Tin	Tin Technology & Refining	UNITED STATES OF AMERICA	CID00
Tin	Tuyen Quang Non-Ferrous Metals Joint Stock Company	VIET NAM	CID00
Tin	VQB Mineral and Trading Group JSC	VIET NAM	CID00
Tin	White Solder Metalurgia e Mineracao Ltda.	BRAZIL	CID00
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA	CID00
Tin	Yunnan Tin Company Limited	CHINA	CID00
Tin	Yunnan Yunfan Non-ferrous Metals Co., Ltd.	CHINA	CID00
Tungsten	A.L.M.T. Corp.	JAPAN	CID00
Tungsten	ACL Metais Eireli	BRAZIL	CID00
Tungsten	Albasteel Industria e Comercio de Ligas Para Fundicao Ltd.	BRAZIL	CID00
Tungsten	Artek LLC	RUSSIAN FEDERATION	CID00
Tungsten	Asia Tungsten Products Vietnam Ltd.	VIET NAM	CID00
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.	CHINA	CID00
Tungsten	China Molybdenum Co., Ltd.	CHINA	CID00
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA	CID00
Tungsten	CNMC (Guangxi) PGMA Co., Ltd.	CHINA	CID00
Tungsten	Cronimet Brasil Ltda	BRAZIL	CID00
Tungsten	Fujian Ganmin RareMetal Co., Ltd.	CHINA	CID00
Tungsten	Ganzhou Haichuang Tungsten Co., Ltd.	CHINA	CID00
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	CHINA	CID00
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHINA	CID00
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA	CID00
Tungsten	GEM Co., Ltd.	CHINA	CID00
Tungsten	Global Tungsten & Powders Corp.	UNITED STATES OF AMERICA	CID00
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CHINA	CID00
Tungsten	H.C. Starck Smelting GmbH & Co. KG	GERMANY	CID00
Tungsten	H.C. Starck Tungsten GmbH	GERMANY	CID00
Tungsten	Hunan Chenzhou Mining Co., Ltd.	CHINA	CID00
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.	CHINA	CID00
Tungsten	Hydrometallurg, JSC	RUSSIAN FEDERATION	CID00
Tungsten	Japan New Metals Co., Ltd.	JAPAN	CID00
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA	CID00

**EXHIBIT 1.01**

Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CHINA	CID00
Tungsten	Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.	CHINA	CID00
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHINA	CID00
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CHINA	CID00
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CHINA	CID00
Tungsten	JSC "Kirovgrad Hard Alloys Plant"	RUSSIAN FEDERATION	CID00
Tungsten	Kennametal Fallon	UNITED STATES OF AMERICA	CID00
Tungsten	Kennametal Huntsville	UNITED STATES OF AMERICA	CID00
Tungsten	KGETS Co., Ltd.	KOREA, REPUBLIC OF	CID00
Tungsten	Lianyou Metals Co., Ltd.	TAIWAN, PROVINCE OF CHINA	CID00
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CHINA	CID00
Tungsten	Masan Tungsten Chemical LLC (MTC)	VIET NAM	CID00
Tungsten	Moliren Ltd.	RUSSIAN FEDERATION	CID00
Tungsten	Niagara Refining LLC	UNITED STATES OF AMERICA	CID00
Tungsten	NPP Tyazhmetprom LLC	RUSSIAN FEDERATION	CID00
Tungsten	Philippine Chuangxin Industrial Co., Inc.	PHILIPPINES	CID00
Tungsten	Unecha Refractory metals plant	RUSSIAN FEDERATION	CID00
Tungsten	Wolfram Bergbau und Hutten AG	AUSTRIA	CID00
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CHINA	CID00
Tungsten	Xiamen Tungsten Co., Ltd.	CHINA	CID00
Tungsten	Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.	CHINA	CID00