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

FORM SD
SPECIALIZED DISCLOSURE REPORT

PCTEL, Inc.
(Exact name of registrant as specified in its charter)

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)

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, 2021.

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, 2021 to December 31, 2021.

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 under Investor Relations.

Section 2 – Exhibits

Item 2.01. Exhibits

Exhibit 1.01 – [Conflict Minerals Report](#)

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: May 31, 2022

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', the 'Company', 'we', 'ours' and 'us') is a leading global provider of wireless technology, including purpose-built Industrial Internet of Things ("IoT") devices, antenna products, and test and measurement tools. During 2021, 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 performed 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 2021 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 Conflict Mineral 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.

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.

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

EXHIBIT 1.01

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 responses 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 51% 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 333 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, 230 of these SORs are Responsible Minerals Assurance Process (RMAP) conformant, which accounts for approximately 69% of the 333 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. 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
 - Engage suppliers during the year to communicate expectations
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Appendix A

| Metal | Smelter Name | Smelter Facility Location | Smelter ID |
|--------------|---|----------------------------------|-------------------|
| Gold | Aida Chemical Industries Co., Ltd. | Japan | CID000019 |
| Gold | Allgemeine Gold-und Silberscheideanstalt A.G. | Germany | CID000035 |
| Gold | AngloGold Ashanti Corrego do Sitio Mineracao | Brazil | CID000058 |
| Gold | Argor-Heraeus S.A. | Switzerland | CID000077 |
| Gold | Asahi Pretec Corp. | Japan | CID000082 |
| Gold | Asaka Riken Co., Ltd. | Japan | CID000090 |
| Gold | Aurubis AG | Germany | CID000113 |
| Gold | Boliden AB | Sweden | CID000157 |
| Gold | C. Hafner GmbH + Co. KG | Germany | CID000176 |
| Gold | CCR Refinery - Glencore Canada Corporation | Canada | CID000185 |
| Gold | Chimet S.p.A. | Italy | CID000233 |
| Gold | Dowa | Japan | CID000401 |
| Gold | Eco-System Recycling Co., Ltd. East Plant | Japan | CID000425 |
| Gold | Heimerle + Meule GmbH | Germany | CID000694 |
| Gold | Heraeus Metals Hong Kong Ltd. | China | CID000707 |
| Gold | Ishifuku Metal Industry Co., Ltd. | Japan | CID000807 |
| Gold | Istanbul Gold Refinery | Turkey | CID000814 |
| Gold | Asahi Refining USA Inc. | United States Of America | CID000920 |
| Gold | Asahi Refining Canada Ltd. | Canada | CID000924 |
| Gold | JX Nippon Mining & Metals Co., Ltd. | Japan | CID000937 |
| Gold | Kennecott Utah Copper LLC | United States Of America | CID000969 |
| Gold | Kojima Chemicals Co., Ltd. | Japan | CID000981 |
| Gold | LS-NIKKO Copper Inc. | Korea, Republic Of | CID001078 |
| Gold | Materion | United States Of America | CID001113 |
| Gold | Matsuda Sangyo Co., Ltd. | Japan | CID001119 |
| Gold | Metalor Technologies (Suzhou) Ltd. | China | CID001147 |
| Gold | Metalor Technologies (Hong Kong) Ltd. | China | CID001149 |
| Gold | Metalor Technologies (Singapore) Pte., Ltd. | Singapore | CID001152 |
| Gold | Metalor Technologies S.A. | Switzerland | CID001153 |
| Gold | Metalor USA Refining Corporation | United States Of America | CID001157 |
| Gold | Metalurgica Met-Mex Penoles S.A. De C.V. | Mexico | CID001161 |
| Gold | Mitsubishi Materials Corporation | Japan | CID001188 |
| Gold | Mitsui Mining and Smelting Co., Ltd. | Japan | CID001193 |
| Gold | Nihon Material Co., Ltd. | Japan | CID001259 |
| Gold | Ohura Precious Metal Industry Co., Ltd. | Japan | CID001325 |
| Gold | PAMP S.A. | Switzerland | CID001352 |
| Gold | Rand Refinery (Pty) Ltd. | South Africa | CID001512 |
| Gold | Royal Canadian Mint | Canada | CID001534 |
| Gold | SEMPSA Joyeria Plateria S.A. | Spain | CID001585 |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd. | China | CID001622 |

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| Gold | Solar Applied Materials Technology Corp. | Taiwan, Province Of China | CID001761 |
| Gold | Sumitomo Metal Mining Co., Ltd. | Japan | CID001798 |
| Gold | Tanaka Kikinzoku Kogyo K.K. | Japan | CID001875 |
| Gold | The Refinery of Shandong Gold Mining Co., Ltd. | China | CID001916 |
| Gold | Tokuriki Honten Co., Ltd. | Japan | CID001938 |
| Gold | Umicore S.A. Business Unit Precious Metals Refining | Belgium | CID001980 |
| Gold | United Precious Metal Refining, Inc. | United States Of America | CID001993 |
| Gold | Valcambi S.A. | Switzerland | CID002003 |
| Gold | Western Australian Mint (T/a The Perth Mint) | Australia | CID002030 |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | China | CID002224 |
| Gold | Gold Refinery of Zijin Mining Group Co., Ltd. | China | CID002243 |
| Gold | WIELAND Edelmetalle GmbH | Germany | CID002778 |
| Gold | Advanced Chemical Company | United States Of America | CID000015 |
| Gold | Almalyk Mining and Metallurgical Complex (AMMC) | Uzbekistan | CID000041 |
| Gold | Atasay Kuyumculuk Sanayi Ve Ticaret A.S. | Turkey | CID000103 |
| Gold | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | Philippines | CID000128 |
| Gold | Caridad | Mexico | CID000180 |
| Gold | Cendres + Metaux S.A. | Switzerland | CID000189 |
| Gold | Yunnan Copper Industry Co., Ltd. | China | CID000197 |
| Gold | Chugai Mining | Japan | CID000264 |
| Gold | Daye Non-Ferrous Metals Mining Ltd. | China | CID000343 |
| Gold | DSC (Do Sung Corporation) | Korea, Republic Of | CID000359 |
| Gold | OJSC Novosibirsk Refinery | Russian Federation | CID000493 |
| Gold | Refinery of Seemine Gold Co., Ltd. | China | CID000522 |
| Gold | Guoda Safina High-Tech Environmental Refinery Co., Ltd. | China | CID000651 |
| Gold | Hangzhou Fuchunjiang Smelting Co., Ltd. | China | CID000671 |
| Gold | LT Metal Ltd. | Korea, Republic Of | CID000689 |
| Gold | Heraeus Precious Metals GmbH & Co. KG | Germany | CID000711 |
| Gold | Hunan Chenzhou Mining Co., Ltd. | China | CID000767 |
| Gold | Hunan Guiyang yinxing Nonferrous Smelting Co., Ltd. | China | CID000773 |
| Gold | HwaSeong CJ CO., LTD. | Korea, Republic Of | CID000778 |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | China | CID000801 |
| Gold | Japan Mint | Japan | CID000823 |
| Gold | Jiangxi Copper Co., Ltd. | China | CID000855 |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant | Russian Federation | CID000927 |
| Gold | JSC Uralelectromed | Russian Federation | CID000929 |
| Gold | Kazakhmys Smelting LLC | Kazakhstan | CID000956 |

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| Gold | Kazzinc | Kazakhstan | CID000957 |
| Gold | Kyrgyzaltyn JSC | Kyrgyzstan | CID001029 |
| Gold | L'azurde Company For Jewelry | Saudi Arabia | CID001032 |
| Gold | Lingbao Gold Co., Ltd. | China | CID001056 |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd. | China | CID001058 |
| Gold | Luoyang Zijin Yinhuai Gold Refinery Co., Ltd. | China | CID001093 |
| Gold | Moscow Special Alloys Processing Plant | Russian Federation | CID001204 |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.S. | Turkey | CID001220 |
| Gold | Navoi Mining and Metallurgical Combinat | Uzbekistan | CID001236 |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | Russian Federation | CID001326 |
| Gold | Penglai Penggang Gold Industry Co., Ltd. | China | CID001362 |
| Gold | Prioksky Plant of Non-Ferrous Metals | Russian Federation | CID001386 |
| Gold | PT Aneka Tambang (Persero) Tbk | Indonesia | CID001397 |
| Gold | PX Precinox S.A. | Switzerland | CID001498 |
| Gold | Sabin Metal Corp. | United States Of America | CID001546 |
| Gold | Samduck Precious Metals | Korea, Republic Of | CID001555 |
| Gold | Samwon Metals Corp. | Korea, Republic Of | CID001562 |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | China | CID001619 |
| Gold | Sichuan Tianze Precious Metals Co., Ltd. | China | CID001736 |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals | Russian Federation | CID001756 |
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM | China | CID001909 |
| Gold | Tongling Nonferrous Metals Group Co., Ltd. | China | CID001947 |
| Gold | Torecom | Korea, Republic Of | CID001955 |
| Gold | Yamakin Co., Ltd. | Japan | CID002100 |
| Gold | Yokohama Metal Co., Ltd. | Japan | CID002129 |
| Gold | Morris and Watson | New Zealand | CID002282 |
| Gold | SAFINA A.S. | Czechia | CID002290 |
| Gold | Guangdong Jinding Gold Limited | China | CID002312 |
| Gold | Umicore Precious Metals Thailand | Thailand | CID002314 |
| Gold | Geib Refining Corporation | United States Of America | CID002459 |
| Gold | MMTC-PAMP India Pvt., Ltd. | India | CID002509 |
| Gold | KGHM Polska Miedz Spolka Akcyjna | Poland | CID002511 |
| Gold | Fidelity Printers and Refiners Ltd. | Zimbabwe | CID002515 |
| Gold | Singway Technology Co., Ltd. | Taiwan, Province Of China | CID002516 |
| Gold | Shandong Humon Smelting Co., Ltd. | China | CID002525 |
| Gold | Al Etihad Gold Refinery DMCC | United Arab Emirates | CID002560 |
| Gold | Emirates Gold DMCC | United Arab Emirates | CID002561 |
| Gold | International Precious Metal Refiners | United Arab Emirates | CID002562 |
| Gold | Kaloti Precious Metals | United Arab Emirates | CID002563 |
| Gold | Sudan Gold Refinery | Sudan | CID002567 |
| Gold | T.C.A S.p.A | Italy | CID002580 |
| Gold | REMONDIS PMR B.V. | Netherlands | CID002582 |

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| Gold | Fujairah Gold FZC | United Arab Emirates | CID002584 |
| Gold | Industrial Refining Company | Belgium | CID002587 |
| Gold | Shirpur Gold Refinery Ltd. | India | CID002588 |
| Gold | Korea Zinc Co., Ltd. | Korea, Republic Of | CID002605 |
| Gold | Marsam Metals | Brazil | CID002606 |
| Gold | TOO Tau-Ken-Altyn | Kazakhstan | CID002615 |
| Gold | Abington Reldan Metals, LLC | United States Of America | CID002708 |
| Gold | SAAMP | France | CID002761 |
| Gold | L'Orfebre S.A. | Andorra | CID002762 |
| Gold | 8853 S.p.A. | Italy | CID002763 |
| Gold | Italpreziosi | Italy | CID002765 |
| Gold | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH | Austria | CID002779 |
| Gold | AU Traders and Refiners | South Africa | CID002850 |
| Gold | GCC Gujrat Gold Centre Pvt. Ltd. | India | CID002852 |
| Gold | Sai Refinery | India | CID002853 |
| Gold | Modeltech Sdn Bhd | Malaysia | CID002857 |
| Gold | Bangalore Refinery | India | CID002863 |
| Gold | Kyshtym Copper-Electrolytic Plant ZAO | Russian Federation | CID002865 |
| Gold | Super Dragon Technology Co., Ltd. | China | CID001810 |
| Gold | Shenzhen Zhonghenglong Real Industry Co., Ltd. | China | CID002527 |
| Gold | Degussa Sonne / Mond Goldhandel GmbH | Germany | CID002867 |
| Gold | Pease & Curren | United States Of America | CID002872 |
| Gold | JALAN & Company | India | CID002893 |
| Gold | SungEel HiMetal Co., Ltd. | Korea, Republic Of | CID002918 |
| Gold | Planta Recuperadora de Metales SpA | Chile | CID002919 |
| Gold | Safimet S.p.A | Italy | CID002973 |
| Gold | State Research Institute Center for Physical Sciences and Technology | Lithuania | CID003153 |
| Gold | African Gold Refinery | Uganda | CID003185 |
| Gold | Gold Coast Refinery | Ghana | CID003186 |
| Gold | NH Recytech Company | Korea, Republic Of | CID003189 |
| Gold | QG Refining, LLC | United States Of America | CID003324 |
| Gold | Dijllah Gold Refinery FZC | United Arab Emirates | CID003348 |
| Gold | CGR Metalloys Pvt Ltd. | India | CID003382 |
| Gold | Sovereign Metals | India | CID003383 |
| Gold | C.I Metales Procesados Industriales SAS | Colombia | CID003421 |
| Gold | Eco-System Recycling Co., Ltd. North Plant | Japan | CID003424 |
| Gold | Eco-System Recycling Co., Ltd. West Plant | Japan | CID003425 |
| Gold | Augmont Enterprises Private Limited | India | CID003461 |
| Gold | Kundan Care Products Ltd. | India | CID003463 |
| Gold | Emerald Jewel Industry India Limited (Unit 1) | India | CID003487 |
| Gold | Emerald Jewel Industry India Limited (Unit 2) | India | CID003488 |
| Gold | Emerald Jewel Industry India Limited (Unit 3) | India | CID003489 |

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|----------|---|--------------------------|-----------|
| Gold | Emerald Jewel Industry India Limited (Unit 4) | India | CID003490 |
| Gold | K.A. Rasmussen | Norway | CID003497 |
| Gold | Alexy Metals | United States Of America | CID003500 |
| Gold | Sancus ZFS (L'Orfebre, SA) | Colombia | CID003529 |
| Gold | Sellem Industries Ltd. | Mauritania | CID003540 |
| Gold | MD Overseas | India | CID003548 |
| Gold | Metallix Refining Inc. | United States Of America | CID003557 |
| Gold | Metal Concentrators SA (Pty) Ltd. | South Africa | CID003575 |
| Gold | WEEEREFINING | France | CID003615 |
| Gold | Value Trading | Belgium | CID003617 |
| Tantalum | F&X Electro-Materials Ltd. | China | CID000460 |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd. | China | CID000211 |
| Tantalum | Guangdong Zhiyuan New Material Co., Ltd. | China | CID000616 |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd. | China | CID000914 |
| Tantalum | Jiujiang Tanbre Co., Ltd. | China | CID000917 |
| Tantalum | LSM Brasil S.A. | Brazil | CID001076 |
| Tantalum | Metallurgical Products India Pvt., Ltd. | India | CID001163 |
| Tantalum | Mineracao Taboca S.A. | Brazil | CID001175 |
| Tantalum | Mitsui Mining and Smelting Co., Ltd. | Japan | CID001192 |
| Tantalum | NPM Silmet AS | Estonia | CID001200 |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd. | China | CID001277 |
| Tantalum | QuantumClean | United States Of America | CID001508 |
| Tantalum | Yanling Jincheng Tantalum & Niobium Co., Ltd. | China | CID001522 |
| Tantalum | Solikamsk Magnesium Works OAO | Russian Federation | CID001769 |
| Tantalum | Taki Chemical Co., Ltd. | Japan | CID001869 |
| Tantalum | Telex Metals | United States Of America | CID001891 |
| Tantalum | Ulba Metallurgical Plant JSC | Kazakhstan | CID001969 |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd. | China | CID002492 |
| Tantalum | D Block Metals, LLC | United States Of America | CID002504 |
| Tantalum | FIR Metals & Resource Ltd. | China | CID002505 |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd. | China | CID002506 |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd. | China | CID002508 |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd. | China | CID002512 |
| Tantalum | KEMET Blue Metals | Mexico | CID002539 |
| Tantalum | H.C. Starck Co., Ltd. | Thailand | CID002544 |
| Tantalum | H.C. Starck Tantalum and Niobium GmbH | Germany | CID002545 |
| Tantalum | H.C. Starck Hermsdorf GmbH | Germany | CID002547 |
| Tantalum | H.C. Starck Inc. | United States Of America | CID002548 |
| Tantalum | H.C. Starck Ltd. | Japan | CID002549 |
| Tantalum | H.C. Starck Smelting GmbH & Co. KG | Germany | CID002550 |
| Tantalum | Global Advanced Metals Boyertown | United States Of America | CID002557 |
| Tantalum | Global Advanced Metals Aizu | Japan | CID002558 |

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| Tantalum | Resind Industria e Comercio Ltda. | Brazil | CID002707 |
| Tantalum | Jiangxi Tuohong New Raw Material | China | CID002842 |
| Tantalum | Yancheng Jinye New Material Technology Co., Ltd. | China | CID003583 |
| Tin | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | China | CID000228 |
| Tin | Alpha | United States Of America | CID000292 |
| Tin | Dowa | Japan | CID000402 |
| Tin | Fenix Metals | Poland | CID000468 |
| Tin | Gejiu Non-Ferrous Metal Processing Co., Ltd. | China | CID000538 |
| Tin | Gejiu Zili Mining And Metallurgy Co., Ltd. | China | CID000555 |
| Tin | Gejiu Kai Meng Industry and Trade LLC | China | CID000942 |
| Tin | China Tin Group Co., Ltd. | China | CID001070 |
| Tin | Malaysia Smelting Corporation (MSC) | Malaysia | CID001105 |
| Tin | Metallic Resources, Inc. | United States Of America | CID001142 |
| Tin | Mineracao Taboca S.A. | Brazil | CID001173 |
| Tin | Minsur | Peru | CID001182 |
| Tin | Mitsubishi Materials Corporation | Japan | CID001191 |
| Tin | Jiangxi New Nanshan Technology Ltd. | China | CID001231 |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd. | Thailand | CID001314 |
| Tin | Operaciones Metalurgicas S.A. | Bolivia (Plurinational State Of) | CID001337 |
| Tin | PT Artha Cipta Langgeng | Indonesia | CID001399 |
| Tin | PT Mitra Stania Prima | Indonesia | CID001453 |
| Tin | PT Prima Timah Utama | Indonesia | CID001458 |
| Tin | PT Refined Bangka Tin | Indonesia | CID001460 |
| Tin | PT Timah Tbk Kundur | Indonesia | CID001477 |
| Tin | PT Timah Tbk Mentok | Indonesia | CID001482 |
| Tin | Rui Da Hung | Taiwan, Province Of China | CID001539 |
| Tin | Thaisarco | Thailand | CID001898 |
| Tin | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | China | CID001908 |
| Tin | White Solder Metalurgia e Mineracao Ltda. | Brazil | CID002036 |
| Tin | Yunnan Chengfeng Non-ferrous Metals Co., Ltd. | China | CID002158 |
| Tin | PT ATD Makmur Mandiri Jaya | Indonesia | CID002503 |
| Tin | O.M. Manufacturing Philippines, Inc. | Philippines | CID002517 |
| Tin | Metallo Belgium N.V. | Belgium | CID002773 |
| Tin | Metallo Spain S.L.U. | Spain | CID002774 |
| Tin | PT Menara Cipta Mulia | Indonesia | CID002835 |
| Tin | Guangdong Hanhe Non-Ferrous Metal Co., Ltd. | China | CID003116 |
| Tin | Chifeng Dajingzi Tin Industry Co., Ltd. | China | CID003190 |
| Tin | Tin Technology & Refining | United States Of America | CID003325 |
| Tin | Ma'anshan Weitai Tin Co., Ltd. | China | CID003379 |
| Tin | EM Vinto | Bolivia (Plurinational State Of) | CID000438 |

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| Tin | PT Aries Kencana Sejahtera | Indonesia | CID000309 |
| Tin | Estanho de Rondonia S.A. | Brazil | CID000448 |
| Tin | PT Babel Inti Perkasa | Indonesia | CID001402 |
| Tin | PT Babel Surya Alam Lestari | Indonesia | CID001406 |
| Tin | PT Belitung Industri Sejahtera | Indonesia | CID001421 |
| Tin | PT Bukit Timah | Indonesia | CID001428 |
| Tin | PT Panca Mega Persada | Indonesia | CID001457 |
| Tin | PT Sariwiguna Binasentosa | Indonesia | CID001463 |
| Tin | PT Stanindo Inti Perkasa | Indonesia | CID001468 |
| Tin | PT Tinindo Inter Nusa | Indonesia | CID001490 |
| Tin | PT Tommy Utama | Indonesia | CID001493 |
| Tin | Soft Metais Ltda. | Brazil | CID001758 |
| Tin | VQB Mineral and Trading Group JSC | Viet Nam | CID002015 |
| Tin | Yunnan Tin Company Limited | China | CID002180 |
| Tin | CV Venus Inti Perkasa | Indonesia | CID002455 |
| Tin | Magnu's Minerai's Metais e Ligas Ltda. | Brazil | CID002468 |
| Tin | PT Tirus Putra Mandiri | Indonesia | CID002478 |
| Tin | Melt Metais e Ligas S.A. | Brazil | CID002500 |
| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | Viet Nam | CID002572 |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company | Viet Nam | CID002573 |
| Tin | Tuyen Quang Non-Ferrous Metals Joint Stock Company | Viet Nam | CID002574 |
| Tin | PT Cipta Persada Mulia | Indonesia | CID002696 |
| Tin | An Vinh Joint Stock Mineral Processing Company | Viet Nam | CID002703 |
| Tin | Resind Industria e Comercio Ltda. | Brazil | CID002706 |
| Tin | Super Ligas | Brazil | CID002756 |
| Tin | PT Sukses Inti Makmur | Indonesia | CID002816 |
| Tin | Modeltech Sdn Bhd | Malaysia | CID002858 |
| Tin | PT Bangka Serumpun | Indonesia | CID003205 |
| Tin | Pongpipat Company Limited | Myanmar | CID003208 |
| Tin | Dongguan CiEXPO Environmental Engineering Co., Ltd. | China | CID003356 |
| Tin | PT Rajawali Rimba Perkasa | Indonesia | CID003381 |
| Tin | Luna Smelter, Ltd. | Rwanda | CID003387 |
| Tin | Yunnan Yunfan Non-ferrous Metals Co., Ltd. | China | CID003397 |
| Tin | Precious Minerals and Smelting Limited | India | CID003409 |
| Tin | Gejiu City Fuxiang Industry and Trade Co., Ltd. | China | CID003410 |
| Tin | PT Mitra Sukses Globalindo | Indonesia | CID003449 |
| Tin | Novosibirsk Processing Plant Ltd. | Russian Federation | CID001305 |
| Tin | PT Timah Nusantara | Indonesia | CID001486 |
| Tin | CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda | Brazil | CID003486 |

EXHIBIT 1.01

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| Tin | CRM Synergies | Spain | CID003524 |
| Tin | Fabrica Auricchio Industria e Comercio Ltda. | Brazil | CID003582 |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd. | China | CID000258 |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd. | China | CID000769 |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd. | China | CID000875 |
| Tungsten | Xiamen Tungsten Co., Ltd. | China | CID002082 |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd. | China | CID002317 |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd. | China | CID002494 |
| Tungsten | A.L.M.T. Corp. | Japan | CID000004 |
| Tungsten | Kennametal Huntsville | United States Of America | CID000105 |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd. | China | CID000218 |
| Tungsten | CNMC (Guangxi) PGMA Co., Ltd. | China | CID000281 |
| Tungsten | Global Tungsten & Powders Corp. | United States Of America | CID000568 |
| Tungsten | Hunan Chenzhou Mining Co., Ltd. | China | CID000766 |
| Tungsten | Japan New Metals Co., Ltd. | Japan | CID000825 |
| Tungsten | Kennametal Fallon | United States Of America | CID000966 |
| Tungsten | Wolfram Bergbau und Hutten AG | Austria | CID002044 |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. | China | CID002313 |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd. | China | CID002315 |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd. | China | CID002316 |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | China | CID002318 |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd. | China | CID002319 |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd. | China | CID002320 |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd. | China | CID002321 |
| Tungsten | Asia Tungsten Products Vietnam Ltd. | Viet Nam | CID002502 |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd. | China | CID002513 |
| Tungsten | H.C. Starck Tungsten GmbH | Germany | CID002541 |
| Tungsten | H.C. Starck Smelting GmbH & Co. KG | Germany | CID002542 |
| Tungsten | Masan Tungsten Chemical LLC (MTC) | Viet Nam | CID002543 |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd. | China | CID002551 |
| Tungsten | Niagara Refining LLC | United States Of America | CID002589 |
| Tungsten | China Molybdenum Co., Ltd. | China | CID002641 |
| Tungsten | Ganzhou Haichuang Tungsten Co., Ltd. | China | CID002645 |
| Tungsten | Hydrometallurg, JSC | Russian Federation | CID002649 |
| Tungsten | Unecha Refractory metals plant | Russian Federation | CID002724 |
| Tungsten | Philippine Chuangxin Industrial Co., Inc. | Philippines | CID002827 |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd. | China | CID002830 |
| Tungsten | ACL Metais Eireli | Brazil | CID002833 |
| Tungsten | Moliren Ltd. | Russian Federation | CID002845 |
| Tungsten | KGETS Co., Ltd. | Korea, Republic Of | CID003388 |

EXHIBIT 1.01

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| Tungsten | Fujian Ganmin RareMetal Co., Ltd. | China | CID003401 |
| Tungsten | Lianyou Metals Co., Ltd. | Taiwan, Province Of China | CID003407 |
| Tungsten | JSC "Kirovgrad Hard Alloys Plant" | Russian Federation | CID003408 |
| Tungsten | NPP Tyazhmetprom LLC | Russian Federation | CID003416 |
| Tungsten | GEM Co., Ltd. | China | CID003417 |
| Tungsten | Albasteel Industria e Comercio de Ligas Para Fundicao Ltd. | Brazil | CID003427 |
| Tungsten | Cronimet Brasil Ltda | Brazil | CID003468 |
| Tungsten | Artek LLC | Russian Federation | CID003553 |
| Tungsten | Fujian Xinlu Tungsten | China | CID003609 |
| Tungsten | OOO "Technolom" 2 | Russian Federation | CID003612 |
| Tungsten | OOO "Technolom" 1 | Russian Federation | CID003614 |