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

**FORM SD** 

**Specialized Disclosure Report** 

## JOHNSON OUTDOORS INC.

(Exact name of registrant as specified in its charter)

Wisconsin

(State or other jurisdiction of incorporation or organization)

(State or other jurisdiction of incorporation or organization)

(IRS Employer Identification No.)

(Address of principal executive offices)

Lori Strangberg, Corporate Controller, (262) 631-6600

(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, 2018.

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

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

Johnson Outdoors Inc. ("JOI" or "the Company") is a leading global manufacturer and marketer of branded seasonal outdoor recreation products used primarily for fishing, diving, watercraft recreation and camping.

JOI has a publically available Conflict Minerals Policy that may be found at the following URL: <a href="https://www.johnsonoutdoors.com/legal/conflict-minerals-policy">https://www.johnsonoutdoors.com/legal/conflict-minerals-policy</a>. The content of any website referred to in this Form SD (or in the attached Conflict Minerals Report) is included for general information only and is not incorporated by reference in this Form SD.

The Company has concluded in good faith that during the year ended December 31, 2018, conflict minerals were necessary to the functionality and/or production of products manufactured by JOI (such minerals are referred to as "necessary conflict minerals"). Necessary conflict minerals were sourced from the Company's multi-tiered supply chain and were ultimately incorporated into its products via both internal manufacturing processes and by component manufacturers. The Company, through its independent third-party consultant, conducted a reasonable country of origin inquiry ("RCOI") with due diligence, based on the "Organisation for Economic Co-operation and Development Due Diligence guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas," for its products which was designed to determine whether any of these conflict minerals originated in the Democratic Republic of the Congo ("DRC") or an adjoining country (together, "Covered Countries") or were from recycled or scrap sources. For a description of our due diligence, please see our Conflict Minerals Report (Exhibit 1.01).

## Item 1.02 Exhibit

The Company has filed a Conflict Minerals Report for the reporting period January 1, 2018 to December 31, 2018 as Exhibit 1.01 to this Form SD which further describes its products that contain necessary conflict minerals, RCOI methodology, due diligence procedures, results and steps that will be taken to mitigate the risk that necessary conflict minerals benefit armed groups, including steps to improve due diligence.

## Section 2 – Exhibits

## Item 2.01 Exhibits

Exhibit 1.01 – Conflict Minerals Report as required by Items 1.01 and 1.02 of this Form. A copy of the Conflict Minerals Report is on the Company's website.

## **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.

JOHNSON OUTDOORS INC.

/s/ David W. Johnson	May 31st, 2019
David W. Johnson	(Date)
Vice President and Chief Financial Officer	

## Johnson Outdoors Inc. Conflict Minerals Report for Calendar Year 2018 May 31, 2019

Exhibit 1.01 to Specialized Disclosure Report Accompanying Form SD Filed with the SEC on: <u>May 31, 2019</u>

Signed by: /s/ David W. Johnson

Name, Title: David W. Johnson, Chief Financial Officer

Date: May 31, 2019

#### **Introduction:**

Johnson Outdoors Inc. ("JOI," "we," "us," "our") is a publicly traded U.S. company that recognizes itself as an issuer as defined under section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, referred to in this report as "Dodd-Frank." JOI manufactures, and contracts to manufacture, products for which conflict minerals, as defined by Dodd-Frank, are necessary to functionality. Through its due diligence regarding the source and chain of custody of the conflict minerals (tin, tantalum, tungsten and gold) in its supply chain in calendar year 2018, JOI has reason to believe that some of these necessary conflict minerals may have originated from the Democratic Republic of Congo or adjoining countries, and that some of those minerals may not be solely from recycled or scrap sources.

As an issuer under Dodd-Frank, JOI has fully complied with issuer requirements under the law by designing, implementing, executing, and managing its Conflict Minerals Program as mandated by the legislation. This Conflict Minerals Report is filed with our Form SD to comply with the requirements of Rule 13p-1 of the Securities and Exchange Act 1934. This report includes elements, efforts, results, and conclusions of compliance and due diligence activities required by the legislation.

All terms and definitions in this conflict minerals report are as defined by the Final Rules promulgated under Dodd-Frank and by the <u>Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.</u>

JOI supports the Responsible Minerals Initiative's (RMI) Responsible Minerals Assurance Process (RMAP) by performing supply chain compliance and due diligence requirements for smelters sourcing from, or believed to source from, or have operations or activities in or through, the Democratic Republic of Congo (DRC) and adjoining countries. The DRC and its nine adjoining countries (Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia) are referred to collectively as Covered Countries, or CCs. JOI's compliance efforts under Dodd-Frank include supporting a clean minerals trade in Covered Countries and maintaining economic relationships with conflict-free smelters in Covered Countries.

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JOI's Conflict Minerals Program is performed annually and engages JOI's first-tier and in-scope suppliers under the applicable provisions of Dodd-Frank to perform risk assessments of smelters and refiners (hereafter referred to collectively as smelters or SORs) of tin, tantalum, tungsten, and gold (collectively, "3TG") that may source from and/or may have operations in Covered Countries. Although JOI's Conflict Minerals Program directly engages first-tier and in-scope suppliers, the program annually assesses all active suppliers, both in and out of scope of our Conflict Minerals Program, to ensure that we evaluate 100% of the suppliers in our supply chain.

JOI's Conflict Minerals Program is holistically managed and includes comprehensive supplier evaluations and smelter due diligence in order to identify all the smelters in our global supply chain, as well as the smelter mines and country of origin of 3TG in Covered Countries to the best of our abilities.

JOI mandates participation in our Conflict Minerals Program as a compulsory element of JOI's Supplier Statement of Basic Standards for all suppliers in our supply chain. Active involvement is required from JOI's first-tier and in-scope suppliers, and passive evaluation is requested from out of scope suppliers. The supplier evaluation portion of JOI's Conflict Minerals Program is just part of the entire scope of its comprehensive supply chain transparency program. Other critical elements of this program include cooperation from JOI business group leaders, management, and other supply chain actors. The cornerstone of this project is a strong company management system and dedication from business group leaders, senior management, and senior executives to ensure the completeness, integrity, and evolution of the program.

Communication and training for suppliers and JOI employees is performed throughout the calendar year to promote continued support and understanding of the program as it relates to fulfillment of internal and external obligations under the Dodd-Frank rule. Because JOI's successful Conflict Minerals Program includes both suppliers and JOI employees, all participants in the program are advised routinely during each calendar year regarding their respective responsibilities associated with their role in JOI's supply chain, their compliance expectations, and applicable risks associated with the performance of their obligations.

This report may be found on our website at: https://www.johnsonoutdoors.com/sec. This report is inclusive for all JOI products at a company level, and all covered products in all JOI business groups.

## **JOI's Conflict Minerals Program:**

JOI has successfully implemented and completed its annual Conflict Minerals Program for the past six years, from the time law first required reporting on due diligence efforts performed in 2013. As in all previous years, JOI has performed required due diligence procedures for evaluating chain of custody of the extraction, through end use, of mineral ores containing tin, tantalum, tungsten and gold (3TG), also referred to as conflict minerals. While JOI's Conflict Minerals Program is a routine part of its standard Corporate Social Responsibility business practice, JOI continues to improve its processes and annually reporting of additional information that it discloses regarding its sourcing of conflict minerals.

JOI's Conflict Minerals Program is based on well-established and strong management systems to support all portions and efforts of the program. This foundation creates a comprehensive and robust supply chain transparency and due diligence program that identifies and evaluates smelters of 3TG in JOI's supply chain relating to the conflict minerals necessary to the functionality or production of products manufactured by JOI, or contracted to be manufactured for JOI.

Throughout the calendar year, routine and continued communication is made with all first-tier and in-scope suppliers in order to reasonably identify all global 3TG smelters in Covered Countries. Routine communication is also made to all first-tier active, and out of scope suppliers, to ensure they are consistently queried from year regarding any changes in their conflict minerals status. All communication from JOI to its first-tier active suppliers encourages ongoing sourcing from conflict-free smelters within the global supply chain in order to support legitimate trade in conflict minerals in Covered Countries.

JOI's annual Conflict Minerals Program includes, but is not limited, to the following:

- Maintenance of a publicly available corporate conflict minerals policy.
- Design and implementation of an organization-wide process that ensures awareness, outreach, and training offered to 100% of JOI suppliers, both in
  and out of scope of the Dodd-Frank conflict minerals rule.
- Ensure that 100% of JOI suppliers, both in and out of scope of the Dodd-Frank conflict minerals rule, are made aware of JOI's policy and standards regarding conflict minerals, as well as internal and supplier obligations to comply with our conflict minerals policy.
- Maintenance of internal protocols that ensure conflict minerals supply chain due diligence and obligations are clearly presented and understood by JOI employees, including senior executives, senior management, business group leaders, and support staff, who have responsibility for the SEC disclosure requirements under the Dodd-Frank conflict minerals rule.
- Survey and analysis of all suppliers and identifiable sources of 3TG, including distributors and original equipment manufacturers (OEMs).
- Annual implementation of a supply chain communication plan that includes requests, and repeated requests where necessary, for the completed and
  current RMI Conflict Minerals Reporting Template (CMRT) from suppliers in order to facilitate supply chain transparency by gathering, surveying,
  and evaluating suppliers and sources of 3TG, and identifying 3TG smelters in JOI's supply chain.
- Annual internal audit of all first-tier suppliers regarding their understanding of the conflict minerals rule, their obligations regarding the rule, and JOI's expectations of them regarding their compliance with the rule.
- · Identification of priority first-tier suppliers that supply electrical and electronic equipment (EEE) and electrical and electronic parts (EEP).
- Escalation of Reasonable Country of Origin Inquiry (RCOI) efforts to JOI business group leaders, including identifying smelters from priority suppliers of EEE and EEP.
- Collection of conflict minerals information to identify 3TG in our supply chain, and identification and mitigation of risk that our products may contain conflict minerals that could finance or benefit armed groups in Covered Countries.
- Identification of global 3TG smelters in order to determine the locations, country of origin, and mines of these ores, as well as the processing facilities, operations, or trade routes of 3TG from extraction to end use.
- Reliance on the RMAP and other industry approved mechanisms to validate smelter supply chain due diligence and perform independent third-party audits of smelter due diligence practices.
- Internal research and due diligence to evaluate and validate smelters not participating in the RMAP or other industry approved mechanisms.

- Review and due diligence of RMAP smelters to ensure the validity and current state of RMI information.
- Perform due diligence on RMAP smelters to determine and/or confirm presence in Covered Countries.
- Make annual requests that first-tier and subsequent tier suppliers only source from RMAP participating smelters and/or validated conflict-free smelters of 3TG.
- · Direct contact with smelters that are not participating in the RMAP to encourage them to participate in the RMAP, wherever possible.
- Public disclosure and reporting of the results of our due diligence.
- · Secure maintenance of all records relating to our due diligence efforts for a minimum of five years.
- Multi-tiered assessment and performance of risk mitigation efforts throughout our supply chain including review, evaluation and escalation to, and by, business group leaders and senior management.
- · Maintenance of an annual improvement plan based on previous reporting years and annual lessons learned.
- Maintenance of an online grievance mechanism that allows JOI, its suppliers, and any concerned parties to communicate concerns regarding our Conflict Minerals Program.

### **Due Diligence:**

## **Design of Due Diligence:**

Per the SEC requirements that due diligence measures must conform to a nationally or internationally recognized due diligence framework, JOI's Conflict Minerals Program is designed and implemented based on the "Five Step Framework for Risk-Based Due Diligence in the Mineral Supply Chain" (*Annex I*) and the "Model Supply Chain Policy for a Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas" (*Annex II*) included in the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition).

### **Due Diligence Performed:**

The table below details JOI's due diligence measures performed according to each of the Five Steps in the OECD Framework Guidance. These steps are specific to the due diligence regarding the source and chain of custody of conflict minerals identified in our supply chain, and regarding the smelters identified with 3TG in our supply chain. These activities include, but are not limited to, the following:

OECD Steps:	JOI Due Diligence Measures Performed:	
Step 1:	• Assign and implement multi-disciplinary responsibilities to internal JOI senior executives, senior management, business	
Establish strong company	group leaders, support staff, and our third-party consultant to carry out all elements of JOI's Conflict Minerals	
management systems.	Program.	
	• Maintain a detailed project plan and hold semi-monthly meetings for JOI employees, business group leaders, and	
	senior management who have responsibility for the SEC disclosure requirements for Dodd-Frank regarding conflict	
	minerals, and regularly publish this project plan on JOI's intranet.	

	<ul> <li>Annual review of JOI's Conflict Minerals Program and results by senior management, senior executives, and legal counsel.</li> </ul>
	<ul> <li>Annual discussion and conclusions made by business group leaders, senior management and senior executives</li> </ul>
	regarding decisions that are determined in the Conflict Minerals Report and Form SD.
	Maintain records in a secure computerized database repository for a minimum of five years.
Step 2:	<ul> <li>Evaluate 100% of JOI first-tier suppliers across all business groups as being in or out of scope of the Conflict Minerals</li> </ul>
Identify and assess risk in the	
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supply chain.	review and verify supplier commodity class and status.
	Review and update of affected and priority suppliers.
	<ul> <li>Review new suppliers and changes in supplier status and commodity class.</li> </ul>
	<ul> <li>Assess risk in our supply chain according to commodity class, supplier status and supplier responses.</li> </ul>
	<ul> <li>Engage suppliers by performing multi-tiered survey of 100% of JOI in-scope and first-tier conflict minerals suppliers</li> </ul>
	by requesting current, complete, and accurate CMRTs in order to identify 3TG smelters in the supply chain and set
	expectations for compliance.
	<ul> <li>Annually redistribute copies of our conflict minerals policy and basic standards to all active first-tier suppliers,</li> </ul>
	regardless of commodity class or in-scope status of conflict minerals.
	• Analyze smelter information from suppliers with the information available from the RMI, the London Market Bullion
	Association (LBMA), the Responsible Jewellery Council (RJC), and other accredited industry mechanisms.
	Analyze smelter information from suppliers via other sources, including but not limited to information from: the
	United States Department of Commerce; United Nations publications; iTSCi (ITRI Tin Supply Chain Initiative);
	extensive internet research including smelter websites and company profiles; non-governmental organization (NGO)
	websites; in-region sourcing programs; industry leader CMRTs and reports; specialized SEC research reports; public
	news articles and publications.
	• Identify smelters of 3TG that appear to have facilities, or likelihood of facilities, operations or trade routes, in Covered
	Countries.
	<ul> <li>Report identified and/or potential supply chain risks to business group leaders and senior management.</li> </ul>
	• Report potential supply chain risks to applicable suppliers and request further supplier due diligence where needed.
Step 3:	<ul> <li>Perform internal audit of the distribution of our conflict minerals policy to evaluate and ensure supplier understanding,</li> </ul>
Design and implement a	acknowledgment, and adherence to this policy and our basic standards.
strategy to respond to	• Perform internal multi-tiered analysis of our suppliers' CMRTs including: completeness; reasonable response based on
identified risks.	commodity class and scope; consistency with previous reporting year(s) information; and identification of smelters.

•	Communicate supplier expectations for return of the most current CMRT including identifying all valid and current
	smelters.
•	Communicate supplier expectation that they notify us of any risks and red flags identified by their own due diligence activities for smelters.
•	Communicate supplier expectation that they notify us immediately of any smelters that may be suspected of supporting
	armed groups in Covered Countries.

- Request supplier confirmation for the validity of questionable and high-risk smelter presence in the supply chain.
- Inform suppliers not to source from smelters associated with U.S. sanctioned entities.
- Perform ongoing internal and external training of the conflict minerals rule and risks to JOI employees and all suppliers in the supply chain.
- Engage JOI business group leaders, support staff, and our third-party consultant in multi-tiered follow ups and
  escalations with suppliers in an effort to obtain higher quantity and quality of smelter information, particularly from
  suppliers of EEE and EEP.
- Use JOI level of influence to encourage suppliers to source from RMI audited and compliant smelter lists and communicate the expectation that they source only from smelters participating in the RMAP or other industry approved mechanism.
- Encourage identified smelters to participate in the RMAP and obtain RMAP Conformant certification if they have not already done so.
- Continue to improve on efficiencies and effectiveness of our Conflict Minerals Program to close gaps and mitigate
  risks for each subsequent reporting year.
- Perform risk mitigation efforts to ensure suppliers are in conformance with our conflict minerals policy and expectations.
- Execute a risk mitigation plan that improves supply chain due diligence and mitigates the risk that any conflict minerals identified in our supply chain may benefit any armed groups in Covered Countries.
- Communicate risks to business group leaders, our internal conflict minerals senior management team, and senior
  executives.
- Request that business group leaders evaluate and identify any additional risks throughout the due diligence process.
- Perform gap analysis and communicate these gaps and issues to our conflict minerals senior management team, and senior executives.
- Review and discuss supplier and smelter gaps with business group leaders, conflict minerals senior management team and senior executives.

# Step 4: Carry out independent thirdparty audit of smelter due diligence practices.

- Identify smelters in Covered Countries that are conflict-free, or participating in a conflict-free program as defined by the RMI.
- Rely on the due diligence performed by the RMI, LBMA and RJC regarding smelter conflict-free status.

	<ul> <li>Review RMI smelter information for timeliness, accuracy, and changes.</li> <li>Review RMAP corrective action plans and schedules for relevant smelters.</li> <li>Directly contact smelters in the form of an RCOI regarding chain of custody of conflict minerals and evidence of due diligence for whom we were unable to confirm conflict-free status via the sources above.</li> <li>Conduct screening of smelters against the current Office of Foreign Assets Control (OFAC) list.</li> </ul>
Step 5: Report on supply chain due diligence.	• In compliance with Dodd-Frank and the SEC Final Rule, on or before May 31, 2019, JOI will file Form SD and Conflict Minerals Report (this report) with the SEC, as well as publish this information on its website.

## **Results of Due Diligence:**

JOI identified 314 unique and validated 3TG smelters in its supply chain in calendar year/reporting year 2018 (RY2018). These are associated with the following 3TG as follows:

Gold: 143Tantalum: 41Tin: 88Tungsten: 42

Out of these 314 smelters, JOI identified 96 unique smelters that we have reason to believe either source 3TG from the DRC and/or surrounding countries (Covered Countries) or have some type of facility, operation, or trade route in Covered Countries anywhere from extraction to end use. JOI exercised due diligence on the conflict mineral (CM) source and chain of custody for these 96 smelters who we believe may have a presence in Covered Countries.

Conflict-free (CF) status and believed Covered Country facility location for these 96 smelters are summarized in the table below. The conflict-free status is based on due diligence research performed starting from January 23<sup>rd</sup>, 2019 and concluded on March 26<sup>th</sup>, 2019. Details regarding specific smelter names, countries, and believed facility locations of 3TG, in and out of Covered Countries, may be shared upon request.

## **Smelter Table:**

3TG; # of Smelters:	96 Smelters with 346 Possible Locations in Covered Countries (CCs):	
Gold: 24 Smelters	<ul> <li>5 possible presences located in 9 CCs:</li> <li>21 RMI RMAP SORs include 47 possible presences in the following CCs: DRC (12); Angola (1); Burundi (3); Central African Republic (1); Republic of the Congo (2); Rwanda (12); S. Sudan (1); Tanzania (7); Uganda (4); Zambia (4)</li> <li>1 CF self-declared and believed to be CF SOR include 4 possible presences in the following CCs: DRC (1); Angola (0); Burundi (0); Central African Republic (0); Republic of the Congo (0); Rwanda (1); S. Sudan (1); Tanzania (0); Uganda (1); Zambia (0)</li> <li>2 unknown CM Compliant SORs include 5 possible presences in the following CCs: DRC (1); Angola (2); Burundi (0); Central African Republic (0); Republic of the Congo (0); Rwanda; (1) S. Sudan (0); Tanzania (0); Uganda (0); Zambia (1)</li> </ul>	
Tantalum: 24 Smelters	<ul> <li>167 possible presences located in 10 CCs:</li> <li>24 RMI RMAP SORs include 167 possible presences in the following CCs: DRC (23); Angola (14); Burundi (19); Central African Republic (14); Republic of the Congo (16); Rwanda (21); S. Sudan (14); Tanzania (16); Uganda (16); Zambia (14)</li> </ul>	
Tin: 26 Smelters	69 possible presences located in 10 CCs:  • 26 RMI RMAP SORs include 69 possible presences in the following CCs: DRC (22); Angola (5); Burundi (4); Central African Republic (3); Republic of the Congo (6); Rwanda (16); S. Sudan (3); Tanzania (3); Uganda (3); Zambia (4)	
Tungsten: 22 Smelters	<ul> <li>54 possible presences located in 10 CCs:</li> <li>21 RMI RMAP SORs include 52 possible presences in the following CCs: DRC (14); Angola (1); Burundi (10); Central African Republic (1); Republic of the Congo (1); Rwanda (14); S. Sudan (2); Tanzania (3); Uganda (5); Zambia (1)</li> <li>1 unknown CM Compliant SORs include 2 possible presences in the following CCs: DRC (1); Angola (0); Burundi (0); Central African Republic (0); Republic of the Congo (0); Rwanda; (0) S. Sudan (0); Tanzania (0); Uganda (0); Zambia (1)</li> </ul>	

## **3TG Conflict-Free Due Diligence Summary:**

The conflict-free (CF) status for all 3TG smelters that may have facilities located in Covered Countries is as follows:

- Gold appears to be 92% CF Tantalum appears to be 100% CF Tin appears to be 100% CF Tungsten appears to be 95% CF

## RMAP Participation Summary:

The conflict-free status of the 96 smelters listed as a having a possible presence in Covered Countries is as follows:

- 92 (96%) are RMI RMAP Conformant
- 1 (1%) are believed to be CF due to self-declaration or other accreditation(s)
- 3 (3%) are unknown CF status, as no information was available from public sources and the smelters were not able to be confirmed as CF via direct RCOI

## **Due Diligence Conclusion:**

- > 97% of all 3TG smelters that may be in Covered Countries appear to be conflict-free (93 out of 96 smelters)
- > 3% of all 3TG smelters that may be in Covered Countries are unknown CF status (3 out of 96)
- > 96% of all 3TG smelters that may be in Covered Countries were participating in an RMAP program
- > 99% of the 3TG smelters in JOI's entire supply chain, either believed to source in or out of Covered Countries, are conflict-free

### **Improvements:**

The total number of smelters identified in RY2018 is 33.33% more than were identified in RY2017. Despite the notable increase in the number of smelters identified, only three smelters were identified as conflict-free unknown status, which is consistent with RY2017. This is likely due to a 40% increase in the number of RMI RMAP smelters from RY2017 to RY2018.

Smelters that had possible presences in Covered Countries increased significantly, by over 33%, from 72 to 96, demonstrating an improvement in the information being provided by JOI's suppliers regarding their smelters and increased supply chain transparency.

The supplier RCOI response rate also increased in RY2018, by 6%, and there was a 4% increase in number suppliers who furnished smelter names.

JOI experienced a decrease in the number of invalid smelters provided by supplier CMRTs in RY2018 while the percentage of duplicate smelters remained the same. This demonstrates that JOI's suppliers have gained a higher level of consistency in the smelters they report, meaning they may have performed a higher level of smelter due diligence in their own supply chains.

The number of potential presences in Covered Countries rose significantly by 45%, from 238 in RY2017 to 346 in RY2018. This demonstrates the evolution of supply chain transparency, not only for JOI, but for industry, as much of this information is available from public sources.

For the second year in a row, JOI is able to reasonably determine that the tin and tantalum in our supply chain that are believed to be sourced from Covered Countries appear to be 100% conflict-free. The conflict-free status for gold rose significantly from 80% in RY2017 to 92% in RY2018. The conflict-free status for the tungsten in our supply chain was evaluated at 95% conflict-free.

Despite the 33% increase in the number of smelters believed to have some kind of presence in Covered Countries, the number of conflict-free unknown smelters remained at only three, the same number for RY2017. This reflects a conflict-free status of 97% of 3TG smelters in Covered Counties, compared to 96% in RY2017. The overall evaluation of JOI's entire 3TG supply chain, both in and out of Covered Countries, remained consistent with RY2017, at 99% conflict-free.

Year after year JOI has consistently improved its due diligence results by identifying more smelters involved in the sourcing and chain of custody of conflict minerals in our supply chain. This improvement is reflective not only of our due diligence performed, but reflective of the maturing of supply chains across industry as a whole, and the commitment to supporting clean minerals trade in Covered Countries and conflict-affected and high-risk areas (CAHRA) worldwide.

Additional information regarding statistical improvements may be shared upon request.

### **Determination:**

JOI has made a reasonable good faith effort to collect and evaluate all information regarding 3TG smelters in our supply chain as provided by our first-tier and in-scope suppliers, and original equipment manufacturers (OEMs).

JOI performed due diligence on smelters, and their source and chain of custody of conflict minerals, that were identified by JOI first-tier suppliers in scope of Dodd-Frank and applicable OEMs. Additionally, JOI conducted a direct smelter RCOI program to further demonstrate due diligence regarding applicable smelters. Based on these due diligence efforts, JOI has concluded in good faith that certain smelters in our supply chain either do have, or may have, facilities that source 3TG from Covered Countries or may have some type of operations or trade routes, from extraction to end use, in Covered Countries.

Based on these due diligence efforts, JOI has concluded that it does not have sufficient information to conclusively confirm that 100% of the 3TG smelters in our supply chain that may have presences in Covered Countries are conflict-free, or that all 3TGs in our supply chain are sourced exclusively from recycled or scrap sources.

Although we have not been able to confirm the identification and conflict-free status (as defined by the RMI) for 100% of the smelters identified by our first-tier suppliers and OEMs, we can confirm that none of the smelters identified by our first-tier suppliers or OEMs have confirmed to us as sourcing 3TG that directly or indirectly finance or benefit armed groups in Covered Countries.

JOI can reasonably conclude after its due diligence efforts that 100% of the tin and tantalum in its supply chain is sourced from smelters that are either conflict-free or that the tin and tantalum tungsten are from recycled or scrap sources. 100% of all smelter information is based on research from smelter identification by JOI first-tier suppliers and/or original equipment manufacturers.

## Planned Risk Mitigation and Future Due Diligence Measures:

JOI's annual Conflict Minerals program includes routine tasks for planned risk mitigation to identify and remove possible sources of smelters that may support or benefit armed groups in Covered Countries. JOI's due diligence process is designed to identify legitimate sources of 3TG in our supply chain and eliminate smelters that are not validated as being in our supply chain. Continued awareness, education, and outreach to our first-tier suppliers, both in and out of scope of the Conflict Minerals law, has proven an effective method to identify and reduce risks, as well as improve the overall supplier RCOI response rate.

These activities include but are not limited to the following:

- Engage internal business group leaders and support staff at a deep level for review, analysis, evaluation, and recommendation for both supplier and smelter risks in each business group.
- Impose direct responsibility and action items on business group leaders for supplier escalations and risk assessment for their respective business groups.
- Leverage multi-tiered influence from JOI internal and external resources in order to compel its first-tier and in-scope suppliers to deliver more current, accurate, timely, and complete information to correctly identify smelters of conflict minerals, and increase both response level and quality of responses.
- Leverage multi-tiered influence from JOI internal and external resources to increase response level from in-scope and first-tier distributors regarding JOI supply chain procedures and increase their participation in supply chain transparency of conflict minerals, including furnishing CMRTs for their OEMs.
- Emphasize the high probability of 3TG in EEE and EEP, and maintain pressure, specifically on suppliers of EEE/EEP, to provide current, correct, and more comprehensive smelter information, including CMRTs from their OEMs as applicable.
- · Continue to review commodity classes with business group leaders for veracity and inclusion of EEE/EEP criteria.
- Repeat, and continue to enhance, our annual pro-active supplier communication plan to further assist 100% of JOI active suppliers, regardless of scope, regarding the need for correct and complete conflict minerals information to satisfy the SEC requirements, including annual updates, reminders, and ongoing training.
- Use our level of influence to encourage all suppliers to source only from smelters validated as compliant to an RMAP assessment protocol using the most recent version of the RMI RMAP Conformant Smelter List or other accredited independent validation scheme or institutional mechanism.
- Use our level of influence to encourage all suppliers to source away from un-validated conflict-free smelters, unknown status smelters, and to identify the sources of conflict minerals in their supply chains.
- Use our level of influence to have suppliers re-evaluate and confirm or refute the actual presence of questionable smelters as identified in their supply
  chains, including providing updated CMRTs.
- Instruct suppliers to advise JOI if they have reason to believe that any person or entity in their supply chain is directly or indirectly financing or benefiting armed groups in the Covered Countries and provide a discrete mechanism to do so.
- Pressure smelters with undeterminable conflict-free status to become verified as having conflict-free sourcing practices and encourage participation in the RMAP audit process; this is done through direct and repeat smelter RCOIs and other electronic communication where available.
- Review smelter red flags for locations of gold origin and transit and remind suppliers to notify JOI of any smelters where risks and red flags may be
  identified in their diligence activities for all 3TG.
- Review RMAP corrective actions plans and schedules for relevant smelters.
- Review all smelters against the current Office of Foreign Asset Control (OFAC) list.

- Remind all JOI suppliers that they must not directly or indirectly have dealings with an entity that appears on the U.S. Office of Foreign Assets Control's lists of Specially Designated Nationals (SDN) and Blocked Persons as these are U.S. sanctioned entities.
- Remind all JOI suppliers to perform their own risk mitigation actions regarding high-risk smelters.

### **Description of Products:**

Conflict minerals may be found in products that JOI manufactures, or contracts to manufacture. Accessories are included in all groups. The descriptions of product families by business group are as follows:

## Fishing Group:

- · Trolling motors
- Shallow water anchors
- · Battery chargers
- Fishfinders
- · Downriggers

## **Dive Group:**

- · Dive computers, instruments and gauges
- · Dive watches
- Scuba dive equipment
- · Buoyancy compensators

## Camping Group:

- · Camping tents, sleeping bags and furniture
- · Camping stoves
- · Military, party, and event tents

## Watercraft Recreation Group:

- Canoes
- · Kayaks
- · Personal flotation devices
- Paddles

### In Conclusion:

JOI has performed smelter due diligence in good faith and has followed the "OECD Five Step Framework for Risk-Based Due Diligence in the Mineral Supply Chain" (*Annex I*) and the "Model Supply Chain Policy for a Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas" (*Annex II*) to ensure a strong and effective Conflict Minerals Program designed to identify the source and chain of custody regarding conflict minerals necessary to the production of JOI products where applicable. The information in this Conflict Minerals report is represented with the most accuracy to our knowledge. The results are based on and the information represented by our first-tier and in-scope suppliers and OEMs, as well as information from the RMI's website, during the window of research and due diligence performed.

Errors or omissions may be inherent in these results due to errors or omissions in supplier and smelter RCOIs, supplier and OEM CMRTs, the RMI definition of a smelter at the time of the research, and subsequent updates to RMI smelter status and information.

In order for JOI to receive any additional relevant information that may not have been uncovered through our due diligence process in supply chain transparency as it relates to conflict minerals, JOI maintains an early warning risk-awareness conflict minerals grievance mechanism. Any information found to be contradictory to this CMR may be communicated to JOI through this grievance mechanism which may be found at the following URL: <a href="https://www.johnsonoutdoors.com/legal">https://www.johnsonoutdoors.com/legal</a>.

## Appendix A:

Below is a list of the 3TG smelters with one or more worldwide facilities that JOI suppliers identified to potentially be in our supply chain and that were participating at some level with the Responsible Minerals Initiative (RMI) Responsible Minerals Assurance Process (RMAP) in RY2018. The presence of a smelter on the list below does not indicate that JOI products necessarily contained conflict minerals sourced or processed by that smelter. The identity and location information for each entity was reported by the RMI as of January 23<sup>rd</sup>, 2019.

3TG: Smelter Name: Location:

Gold	Advanced Chemical Company	UNITED STATES OF AMERICA
Gold	Aida Chemical Industries Co., Ltd.	JAPAN
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 Corrego do Sitio Mineracao	BRAZIL
Gold	Argor-Heraeus S.A.	SWITZERLAND
Gold	Asahi Pretec Corp.	JAPAN
Gold	Asahi Refining Canada Ltd.	CANADA
Gold	Asahi Refining USA Inc.	UNITED STATES OF AMERICA
Gold	Asaka Riken Co., Ltd.	JAPAN
Gold	AU Traders and Refiners	SOUTH AFRICA
Gold	Aurubis AG	GERMANY
Gold	Bangalore Refinery	INDIA
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES
Gold	Boliden AB	SWEDEN
Gold	C. Hafner GmbH + Co. KG	GERMANY
Gold	CCR Refinery - Glencore Canada Corporation	CANADA
Gold	Cendres + Metaux S.A.	SWITZERLAND
Gold	Chimet S.p.A.	ITALY
Gold	Chugai Mining	JAPAN
Gold	Daejin Indus Co., Ltd.	KOREA, REPUBLIC OF
Gold	DODUCO Contacts and Refining GmbH	GERMANY
Gold	Dowa	JAPAN
Gold	DS PRETECH Co., Ltd.	KOREA, REPUBLIC OF
Gold	DSC (Do Sung Corporation)	KOREA, REPUBLIC OF
Gold	Eco-System Recycling Co., Ltd.	JAPAN
Gold	Emirates Gold DMCC	UNITED ARAB EMIRATES
Gold	Geib Refining Corporation	UNITED STATES OF AMERICA
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CHINA
Gold	HeeSung Metal Ltd.	KOREA, REPUBLIC OF
Gold	Heimerle + Meule GmbH	GERMANY
Gold	Heraeus Metals Hong Kong Ltd.	Hong Kong
Gold	Heraeus Precious Metals GmbH & Co. KG	GERMANY
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	ITALY
Gold	Japan Mint	JAPAN

Gold	Jiangxi Copper Co., Ltd.	CHINA
Gold	JSC Uralelectromed	RUSSIAN FEDERATION
Gold	JX Nippon Mining & Metals Co., Ltd.	JAPAN
Gold	Kazzinc	KAZAKHSTAN
Gold	Kennecott Utah Copper LLC	UNITED STATES OF AMERICA
Gold	KGHM Polska Miedz Spolka Akcyjna	POLAND
Gold	Kojima Chemicals Co., Ltd.	JAPAN
Gold		-
Gold	Korea Zinc Co., Ltd.  Kyrgyzaltyn JSC	KOREA, REPUBLIC OF KYRGYZSTAN
Gold	L'Orfebre S.A.	ANDORRA
Gold	LS-NIKKO Copper Inc.	KOREA, REPUBLIC OF
Gold	Marsam Metals	BRAZIL
Gold	Materion	UNITED STATES OF AMERICA
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	UNITED STATES OF AMERICA
Gold	Metalurgica Met-Mex Penoles 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	Moscow Special Alloys Processing Plant	RUSSIAN FEDERATION
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	TURKEY
Gold	NH Recytech Company	KOREA, REPUBLIC OF
Gold	Nihon Material Co., Ltd.	JAPAN
Gold	Ogussa Osterreichische 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 Novosibirsk Refinery	RUSSIAN FEDERATION
Gold	PAMP S.A.	SWITZERLAND
Gold	Planta Recuperadora de Metales SpA	CHILE
Gold	Prioksky Plant of Non-Ferrous Metals	RUSSIAN FEDERATION
Gold	PT Aneka Tambang (Persero) Tbk	INDONESIA
Gold	PX Precinox S.A.	SWITZERLAND
Gold	Rand Refinery (Pty) Ltd.	SOUTH AFRICA
Gold	REMONDIS PMR B.V.	NETHERLANDS
Gold	Royal Canadian Mint	CANADA
Gold	SAAMP	FRANCE
Gold	Safimet S.p.A	ITALY
Gold	Samduck Precious Metals	KOREA, REPUBLIC OF
Gold	SAXONIA Edelmetalle GmbH	GERMANY
Gold	SEMPSA Joyeria Plateria S.A.	SPAIN
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	SOE Shyolkovsky Factory of Secondary Precious Metals	RUSSIAN FEDERATION
Gold	Solar Applied Materials Technology Corp.	TAIWAN, PROVINCE OF CHINA
Gold	Sumitomo Metal Mining Co., Ltd.	JAPAN
Gold	SungEel HiMetal Co., Ltd.	KOREA, REPUBLIC OF
Juiu	oungaet riniteur Go., atu.	NONLII, KLI ODLIG 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	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.	UNITED STATES OF AMERICA
Gold	Valcambi S.A.	SWITZERLAND
Gold	Western Australian Mint (T/a The Perth Mint)	AUSTRALIA
Gold	WIELAND Edelmetalle GmbH	GERMANY
Gold	Yamakin Co., Ltd.	JAPAN
Gold	Yokohama Metal Co., Ltd.	JAPAN
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA
Tantalum	Asaka Riken Co., Ltd.	JAPAN
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	CHINA
Tantalum	D Block Metals, LLC	UNITED STATES OF AMERICA
Tantalum	Exotech Inc.	UNITED STATES OF AMERICA
Tantalum	F&X Electro-Materials Ltd.	CHINA
Tantalum	FIR Metals & Resource Ltd.	CHINA
Tantalum	Global Advanced Metals Aizu	JAPAN
Tantalum	Global Advanced Metals Boyertown	UNITED STATES OF AMERICA
Tantalum	Guangdong Rising Rare Metals-EO Materials Ltd.	CHINA
Tantalum	Guangdong Zhiyuan New Material Co., Ltd.	CHINA
Tantalum	H.C. Starck Co., Ltd.	THAILAND
Tantalum	H.C. Starck Hermsdorf GmbH	GERMANY
Tantalum	H.C. Starck Inc.	UNITED STATES OF AMERICA
Tantalum	H.C. Starck Ltd.	JAPAN
Tantalum	H.C. Starck Smelting GmbH & Co. KG	GERMANY
Tantalum	H.C. Starck Tantalum and Niobium GmbH	GERMANY
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHINA
Tantalum	Jiangxi Tuohong New Raw Material	CHINA
Tantalum	Jiujiang Janny New Material Co., Ltd.	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	UNITED STATES OF AMERICA
Tantalum	LSM Brasil S.A.	BRAZIL
Tantalum	Metallurgical Products India Pvt., Ltd.	INDIA
Tantalum	Mineracao Taboca S.A.	BRAZIL
Tantalum	Mitsui Mining and Smelting Co., Ltd.	JAPAN
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA
Tantalum	NPM Silmet AS	ESTONIA
Tantalum	Power Resources Ltd.	MACEDONIA
Tantalum	QuantumClean	UNITED STATES OF AMERICA
Tantalum	Resind Industria e Comercio Ltda.	BRAZIL
Tantalum	RFH Tantalum Smeltery Co., Ltd./Yanling Jincheng Tantalum & Niobium Co., Ltd.	CHINA
Tantalum	Solikamsk Magnesium Works OAO	RUSSIAN FEDERATION
rantarulli	Sometime Magnesium Mores OVO	KOSSIAN PEDEKAHUN

Tantalum	Taki Chemical Co., Ltd.	JAPAN
Tantalum	Telex Metals	UNITED STATES OF AMERICA
Tantalum	Ulba Metallurgical Plant JSC	KAZAKHSTAN
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	CHINA
Tin	Alpha	UNITED STATES OF AMERICA
Tin	Gejiu Zili Mining And Metallurgy Co., Ltd.	CHINA
Tin	PT Tirus Putra Mandiri	INDONESIA
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CHINA
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CHINA
Tin	China Tin Group Co., Ltd.	CHINA
Tin	CV Ayi Jaya	INDONESIA
Tin	CV Dua Sekawan	INDONESIA
Tin	CV Gita Pesona	INDONESIA
Tin	CV United Smelting	INDONESIA
Tin	CV Venus Inti Perkasa	INDONESIA
Tin	Dowa	JAPAN
Tin	EM Vinto	BOLIVIA
Tin	Fenix Metals	POLAND
Tin	Gejiu Fengming Metallurgy Chemical Plant	CHINA
Tin	Gejiu Jinye Mineral Company	CHINA
Tin	Gejiu Kai Meng Industry and Trade LLC	CHINA
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA
Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	CHINA
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CHINA
Tin	Guanyang Guida Nonferrous Metal Smelting Plant	CHINA
Tin	HuiChang Hill Tin Industry Co., Ltd.	CHINA
Tin	Huichang Jinshunda Tin Co., Ltd.	CHINA
Tin	Jiangxi New Nanshan Technology Ltd.	CHINA
Tin	Magnu's Minerais Metais e Ligas Ltda.	BRAZIL
Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA
Tin	Melt Metais e Ligas S.A.	BRAZIL
Tin	Metallic Resources, Inc.	UNITED STATES OF AMERICA
Tin	Metallo Belgium N.V.	BELGIUM
Tin	Metallo Spain S.L.U.	SPAIN
Tin	Mineracao Taboca S.A.	BRAZIL
Tin	Minsur	PERU
Tin	Mitsubishi Materials Corporation	JAPAN
Tin	Modeltech Sdn Bhd	MALAYSIA
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND
Tin	O.M. Manufacturing Philippines, Inc.	PHILIPPINES
Tin	Operaciones Metalurgical S.A.	BOLIVIA
Tin	PT Aries Kencana Sejahtera	INDONESIA
Tin	PT Artha Cipta Langgeng	INDONESIA
Tin	PT ATD Makmur Mandiri Jaya	INDONESIA
Tin	PT Babel Inti Perkasa	INDONESIA
Tin	PT Bangka Prima Tin	INDONESIA
Tin	PT Bangka Serumpun	INDONESIA
Tin	PT Bangka Tin Industry	INDONESIA
Tin	PT Belitung Industri Sejahtera	INDONESIA
Tin	PT Bukit Timah	INDONESIA
Tin	PT DS Jaya Abadi	INDONESIA
Tin	PT Inti Stania Prima	INDONESIA

Tin	PT Karimun Mining	INDONESIA
Tin	PT Kijang Jaya Mandiri	INDONESIA
Tin	PT Lautan Harmonis Sejahtera	INDONESIA
Tin	PT Menara Cipta Mulia	INDONESIA
Tin	PT Mitra Stania Prima	INDONESIA
Tin	PT Panca Mega Persada	INDONESIA
Tin	PT Premium Tin Indonesia	INDONESIA
Tin	PT Prima Timah Utama	INDONESIA
Tin	PT Rajehan Ariq	INDONESIA
Tin	PT Refined Bangka Tin	INDONESIA
Tin	PT Sariwiguna Binasentosa	INDONESIA
Tin	PT Stanindo Inti Perkasa	INDONESIA
Tin	PT Sukses Inti Makmur	INDONESIA
Tin	PT Surber Jaya Indah	INDONESIA
	PT Timah Tbk Kundur	INDONESIA
Tin	PT Timah Tbk Mentok	INDONESIA
Tin		
Tin	PT Tinindo Inter Nusa	INDONESIA
Tin	PT Tommy Utama	INDONESIA
Tin	Resind Industria e Comercio Ltda.	BRAZIL
Tin	Rui Da Hung	TAIWAN, PROVINCE OF CHINA
Tin	Soft Metais Ltda.	BRAZIL
Tin	Thaisarco	THAILAND
Tin	Tin Technology & Refining	UNITED STATES OF AMERICA
Tin	White Solder Metlagurgia	BRAZIL
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA
Tin	Yunnan Tin Company Limited	CHINA
Tungsten	A.L.M.T. Corp.	JAPAN
Tungsten	ACL Metais Eireli	BRAZIL
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.	CHINA
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA
Tungsten	Fujian Jinxin Tungsten Co., Ltd.	CHINA
Tungsten	Ganzhou Haichuang Tungsten Co., Ltd.	CHINA
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	CHINA
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHINA
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA
Tungsten	Global Tungsten & Powders Corp.	UNITED STATES OF AMERICA
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CHINA
Tungsten	H.C. Starck Smelting GmbH & Co. KG	GERMANY
Tungsten	H.C. Starck Tungsten GmbH	GERMANY
Tungsten	Hunan Chenzhou Mining Co., Ltd.	CHINA
Tungsten	Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji	CHINA
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.	CHINA
Tungsten	Hunan Litian High-tech Materials 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 Gan Bei Tungsten Co., Ltd.	CHINA
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHINA
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CHINA
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CHINA
Tungsten	Kennametal Fallon	UNITED STATES OF AMERICA
Tungsten	Kennametal Huntsville	UNITED STATES OF AMERICA

Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CHINA
Tungsten	Masan Tungsten Chemical LLC (MTC)	VIET NAM
Tungsten	Moliren Ltd.	RUSSIAN FEDERATION
Tungsten	Niagara Refining LLC	UNITED STATES OF AMERICA
Tungsten	Philippine Chuangxin Industrial Co., Inc.	PHILIPPINES
Tungsten	South-East Nonferrous Metal Company Limited of Hengyang City	CHINA
Tungsten	Tejing (Vietnam) Tungsten Co., Ltd.	VIET NAM
Tungsten	Unecha Refractory metals plant	RUSSIAN FEDERATION
Tungsten	Wolfram Bergbau und Hutten AG	AUSTRIA
Tungsten	Woltech Korea Co., Ltd.	KOREA, REPUBLIC OF
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CHINA
Tungsten	Xiamen Tungsten Co., Ltd.	CHINA

JOI suppliers and OEMs identified at least 56 additional entities which are not listed here because they were either not identified by the RMI or Department of Commerce as valid smelters and/or were not participating in any RMAP program at the time of the report. Consequently, these additional entities are not included in the list above. The names of these smelters may be provided upon request.