CONFLICT MINERALS REPORT OF PHILIP MORRIS INTERNATIONAL INC. FOR THE YEAR ENDED DECEMBER 31, 2021¹

Exhibit 1.01

INTRODUCTION

Philip Morris International Inc., a Virginia holding company, was incorporated in 1987. Our subsidiaries and affiliates and their licensees are engaged in the manufacture and sale of cigarettes, other tobacco products and other nicotine-containing products, including reduced-risk products², in markets outside of the United States of America.

This Conflict Minerals Report (the "Report") is provided in accordance with Rule 13p-1 under the Securities Exchange Act of 1934, as amended ("Rule 13p-1"), for the reporting period from January 1 to December 31, 2021.

Conflict Minerals are defined by the Securities and Exchange Commission (the "SEC") as cassiterite, columbite-tantalite, wolframite and gold, and their derivatives, which are limited to tin, tantalum and tungsten (collectively, the "3TGs"). During the reporting period, we contracted to manufacture the following products within the meaning of Rule 13p-1:

- Platform 1 a precisely controlled heating device incorporating our *IQOS HeatControl* Technology, commercialized under the *IQOS* brand name, into which a specially designed and proprietary tobacco unit is inserted and heated to create an aerosol, and also includes related accessories and parts; and
- Platform 4 includes battery powered e-vapor products that produce an aerosol by vaporizing a nicotinecontaining liquid solution. In 2021, our e-vapor products comprised devices with our e-vapor mesh technology designed to ensure the consistency and quality of the generated aerosol compared to the products with the "coil and wick" technology. In 2020, we discontinued the commercialization of devices with the "coil and wick" technology. In 2021, our e-vapor mesh technology products were commercialized using the *IQOS VEEV* or *VEEV* brand names.

In this report, we refer to Platform 1 and Platform 4 products as "Covered Products."

In 2021, we sourced our Covered Products from five direct suppliers (the "Direct Suppliers"). The electronic components of the Covered Products contain one or more 3TGs. The 3TGs used in the Covered Products are necessary for the functionality or production of the Covered Products.

¹ In this report, "PMI," "Company," "we," "us," and "our" refers to Philip Morris International Inc. and its subsidiaries. Trademarks and science marks in this report are the intellectual property of, or licensed by, the subsidiaries of Philip Morris International Inc. and are italicized.

² Reduced-risk products ("RRPs") is the term PMI uses to refer to products that present, are likely to present, or have the potential to present less risk of harm to smokers who switch to these products versus continuing smoking. PMI has a range of RRPs in various stages of development, scientific assessment and commercialization.

We have implemented policies, procedures and due diligence processes to determine whether any of the 3TGs contained in the Covered Products are sourced from the Democratic Republic of the Congo ("DRC") or any of its adjoining countries ("Covered Countries"), and contribute to the financing of armed conflict in the region. In order to support the economic activity in the region, we have communicated to our Direct Suppliers that we do not discourage them from sourcing 3TGs from the Covered Countries under our Conflict Minerals Policy (also referred to in this report as the "Policy"), so long as they are sourced in accordance with our Responsible Sourcing Principles ("RSP").

We are far removed from the sources of ores from which the 3TGs contained in the Covered Products are procured, and the smelters and refiners that process those ores ("SORs"). Therefore, the efforts to identify the countries of origin for the 3TGs reflect both (i) our downstream position in the supply chain³; and (ii) the applicable OECD Guidance (as defined below).

DUE DILIGENCE MEASURES

A. Design of Our Due Diligence Measures

In 2021, our Conflict Minerals due diligence processes were performed in line with the internationally recognized due diligence framework provided by the Organisation for Economic Co-operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the "OECD Guidance"), as applicable for 3TGs and downstream companies (as the term "downstream companies" is defined in the OECD Guidance)⁴. As described below, our due diligence measures in relation to Covered Products included:

1. Establishing a process managed by members of management, including a dedicated cross-functional team for carrying out Conflict Minerals supply chain due diligence and reporting compliance (the "Conflict Minerals Team");

2. Identifying and assessing Conflict Minerals risks in our supply chain;

3. Designing and implementing strategies to respond to Conflict Minerals risks to the extent identified; and

4. Encouraging the reliance by our Direct Suppliers on an independent third-party audit protocol for assessing the due diligence practices of SORs relevant to Covered Products.

³ As a result of our downstream position in the supply chain, our due diligence processes involve PMI seeking data from our Direct Suppliers and those suppliers seeking similar information in their respective supply chains to identify the original sources of the applicable Conflict Minerals. We also rely, to a large extent, on information collected and provided by third-party validation programs. Because our diligence processes rely on information provided by third parties, they may yield inaccurate or incomplete information.

⁴ "Downstream companies" include metal traders and exchanges, component manufacturers, product manufacturers, original equipment manufacturers and retailers.

B. Due Diligence Program Elements1. Processes Implemented by Company Management Conflict Minerals Policy

We have a Conflict Minerals Policy which is communicated it to our Direct Suppliers to help achieve responsible sourcing of 3TGs in our supply chain. We are committed to operating with integrity and are focused on the responsible sourcing of 3TGs. Our Policy, which is reviewed annually by the Conflict Minerals Team, is attached to this Report as Appendix A, and is also publicly available on our website at: https://www.pmi.com/principles-and-positions/standards/ transparency.

Internal Team

Under the oversight of our Senior Vice President, Operations, our Conflict Minerals Team is comprised by representatives from our operations, finance and legal functions. The Conflict Minerals Team has the overall responsibility for developing and implementing our Conflict Minerals compliance strategy, as well as for reviewing the ongoing progress and effectiveness of the Conflict Minerals reporting. In addition, from time-to time, this cross-functional team engages with specialists in other functions throughout PMI to review and analyze the information relevant to PMI's Conflict Minerals due diligence processes and reporting.

As part of our organizational framework, our Product Compliance Team, which is part of the Life Sciences Department reporting to our Chief Life Sciences Officer, also verifies ingredients and materials used in the direct materials for our Covered Products. Any Conflict Minerals reporting and compliance matters that arise during this verification process are analyzed and addressed by the Conflict Minerals Team.

Furthermore, members of the Conflict Minerals Team with expertise in supply chain management and sustainability also interact with our Direct Suppliers to further improve the quality of their Conflict Minerals due diligence and reporting.

Our senior management and our Board of Directors are informed of the results of our due diligence efforts, supply chain integrity and relationships with our Direct Suppliers.

Supply Chain Transparency Framework

To support PMI's Conflict Minerals compliance program, PMI's supply chain transparency framework combines internal activities, collaboration with our Direct Suppliers and reliance on the information published by industry programs such as the Responsible Minerals Initiative (the "RMI"). The RMI is a global, non-governmental organization that was founded in 2008 by members of the Responsible Business Alliance (the "RBA") and the Global e-Sustainability Initiative. It is comprised by

over 400 companies and associations from over ten industries. The RMI focuses on the sourcing of minerals responsibly and developing best practices and other services to support such responsible minerals sourcing.

As part of our Conflict Minerals due diligence processes, we required our Direct Suppliers to use RMI's Conflict Minerals Reporting Template ("CMRT") to collect and retain the necessary information on the chain of custody of the 3TGs contained in the parts of the Covered Products that they respectively supplied to us, including information about the SORs from which those 3TGs were sourced. The CMRT is generally regarded as the most widely-used standard form to collect information

about Conflict Minerals through the supply chain.

Supplier Engagement and Other Compliance Efforts

Our agreements with our Direct Suppliers also include Conflict Minerals-related provisions that: (i) are consistent with our Conflict Minerals Policy, (ii) require our Direct Suppliers to comply with our due diligence requests; and (iii) encourage our Direct Suppliers to participate in industry-wide or material-specific supply chain mapping initiatives.

In addition, and consistent with our efforts as described in the Conflict Minerals report for the period ended December 31, 2020 (the "2020 Report"), in 2021, we continued to undertake the following efforts to further improve due diligence and supplier engagement:

- We continued our online employee training programs, especially in light of the COVID-19 pandemic. These
 programs addressed various procurement activities, including the sourcing of minerals, compliance with our
 Conflict Minerals Policy and the underlying SEC regulations.
- Our employees continued to communicate to our Direct Suppliers our Policy and our Responsible Sourcing Principles, our commitment to responsible sourcing, compliance expectations and information requirements, including grievance mechanisms. These communications focused on ensuring that our Direct Suppliers understand the regulations and reporting requirements pertaining to the sourcing of Conflict Minerals in their respective supply chains. In addition, our communications also encouraged our Direct Suppliers to review their supply chain due diligence processes related to Conflict Minerals sourcing in terms of accuracy and timeliness of responses, and continue to improve compliance.

As a result of these efforts, in 2021, we continued to see satisfactory levels of both timeliness and completeness of the information submitted to us by our Direct Suppliers. In addition, in 2021:

- We joined the RBA in January 2021;
- We deployed the RBA due diligence process to manage our supply chain this program includes selfassessment questionnaires and a validated assurance program (that includes on-site audits) to monitor the sourcing of conflict minerals from our Direct Suppliers;
- We conducted conflict minerals orientation seminars to two new Direct Suppliers, and we held monthly meetings with all our Direct Suppliers to discuss the requirements;
- We used our supplier due diligence program to assess our Direct Suppliers' compliance with our Responsible Sourcing Principles, which also cover the responsible sourcing of the 3TGs;
- We communicated to our Direct Suppliers our expectation that they use SORs certified as compliant with the Responsible Minerals Assurance Process ("Compliant SORs")⁵ for the manufacture of the Covered Products, and have held online conferences with our Direct Suppliers to reinforce this expectation. Please see "Section C" below for additional information;
- We continued to mandate conflict minerals due diligence based on the OECD Guidance and training as a prerequisite to engagement with any new direct suppliers of electronics;
- We continued to support our due diligence efforts with appropriate record retention practices; and
- We engaged a third-party that specializes in human rights to help us identify and assess human rights risks across our electronics supply chain, including those that may be related to Conflict Minerals (the "Assessment Study"). This Assessment Study was completed in early 2021, and we are currently evaluating the conclusions drawn by the Assessment Study in relation to Conflict Minerals.

⁵ RMI defines an SOR as Active if it participates in the Responsible Minerals Assurance Process ("RMAP") and has committed to undergo an audit with RMI or a cross-recognized certification entity. Upon successful completion of the audit, such SORs are then designated as RMAP-Compliant SORs.

Grievance Mechanism

We have a grievance mechanism that allows our employees to report any suspected violation of PMI's principles and practices to the senior management or the Ethics & Compliance Department. Reports can be made through face-to-face discussions or via email if the employee prefers to remain anonymous. We maintain both a dedicated email address: PMI.EthicsandCompliance@pmi.com, and an independently operated and confidential Compliance Helpline, that operates a phone line and a webline. Concerns can also be reported by our employees confidentially or anonymously. Any such reports related to Conflict Minerals are to be forwarded to the Conflict Minerals Team that will review them and help design appropriate response measures. In addition, we encourage our suppliers to establish their own grievance mechanisms.

2. Identify and Assess Risk in the Supply Chain

We reviewed the answers to the CMRT received from our Direct Suppliers and assessed their completeness, clarity and consistency. We worked with our Direct Suppliers to understand their due diligence process, confirmed that they have established a Conflict Minerals policy and obtained a list of SORs in their respective supply chains for the Covered Products.

Our Direct Suppliers confirmed that some of the SORs in their supply chain may source 3TGs from the Covered Countries and that the 3TGs may not be from recycled or scrap sources. As part of our risk assessment, we checked whether these SORs were Compliant SORs by comparing the facilities identified by our Direct Suppliers against the list provided by the RMI and its Responsible Minerals Assurance Process ("RMAP"), as well as the list provided by the London Bullion Market Association ("LBMA"). We also followed up with additional information requests to obtain the necessary details to better assess the reliability of the responses and the risks in our supply chain in instances where the responses received were not clear or where the SORs were not certified as RMAP- compliant.

Please also see Section B.1 for the discussion of our efforts in 2021 to help identify and assess risk in our supply chain related to 3TG sourcing.

3. Design and Implement a Strategy to Respond to Risks in the Supply Chain

We designed a strategy to respond to risks related to Conflict Minerals in our supply chain. When the members of the Conflict Minerals Team become aware that the due diligence of our direct or indirect suppliers needs improvement, it provides feedback, asks clarifying questions and demands corrective actions where necessary. The members of the Conflict Minerals Team have, and will continue to provide information and training to our Direct Suppliers, and will determine appropriate follow-up actions, if any, to mitigate any identified risks. Follow-up actions may include, but are not limited to, finding alternate sources of supply or terminating existing supplier relationships, as appropriate. We have communicated to

our Direct Suppliers that they should further implement, and communicate to their suppliers to implement, the due diligence standards that reflect the OECD Guidance. Steps to improve the accuracy of the due diligence process are described in Sections B.1 above and D below. For 2021, we found no instances where it was necessary to find replacement sources of supply of Covered Products or terminate a supplier relationship due to a failure to comply with Conflict Minerals requirements. To the extent we expand our supplier base for the relevant products, Conflict Minerals compliance, commitment and our assessment of the readiness to embrace our Responsible Sourcing Practices are among our criteria for selecting new suppliers.

4. Independent Third Party Audit of Supply Chain Due Diligence at Identified Points in the Supply Chain

We rely on the RMI's Responsible Minerals Assurance Process for the performance of third-party audits of SORs. To the extent possible, we review whether any 3TGs sourced from the Covered Countries are "DRC conflict-free" based on the information provided by our Direct Suppliers and the information available on the RMI's website. We encourage our suppliers to join the RBA. In addition, as described above, we have communicated to our Direct Suppliers our expectation that they use Compliant SORs for the manufacture of our Covered Products.

Report on Supply Chain Due Diligence

This Report will be filed with the SEC and will also be publicly available at https://www.pmi.com/principles-and-positions/standards/transparency.

C. Reasonable Country of Origin Inquiry ("RCOI") and Due Diligence on the Source and Chain of Custody

We asked our Direct Suppliers to provide answers to the CMRT to ascertain whether any 3TGs contained in the Covered Products originated from Covered Countries. Based on the evaluation of our Direct Suppliers' responses to their CMRT, we had reason to believe that some of the 3TGs in the Covered Products manufactured in 2021 may have originated in the Covered Countries and were not entirely from recycled or scrap sources.

With respect to the Covered Products, through the CMRT, our Direct Suppliers informed us that, for 2021: (i) 100% of their suppliers provided responses to the CMRT; (ii) 3TGs contained in some Covered Products may have originated from the

Covered Countries; (iii) no 3TGs contained in the Covered Products come from recycled or scrap resources; (iv) 100% of the SORs supplying 3TGs contained in the Covered Products and their locations were identified and reported; and (v) all Direct Suppliers reported that they used Compliant or Active smelters for the respective Covered Products. We compared the facilities that the Direct Suppliers identified in their respective CMRTs to the list of SORs that are certified as RMAP-compliant. While sixteen SORs identified by our Direct Suppliers were not on the RMI list of Compliant SORs at the time of our review, we followed up with the relevant Direct Suppliers and, based on information supplied by our Direct Suppliers, we believe that these SORs were Active SORs during the reporting period.⁶

⁶ RMI defines an SOR as Active if it participates in the Responsible Minerals Assurance Process and has committed to undergo an audit with RMI or a cross-recognized certification entity. Upon successful completion of such audit, such SORs would become Compliant SORs.

D. Steps to Further Improve Due Diligence

In line with our commitment to Responsible Sourcing Principles, in January 2021, we joined the Responsible Minerals Initiative ("RMI"). We plan to be an active participant of RMI. In addition, we plan to concentrate on the following steps in the future:

- As part of our Responsible Sourcing Principles framework, continue to engage with our Direct Suppliers to communicate our expectation that they source 3TGs for our products from Compliant SORs;
- Encourage our Direct Suppliers to further strengthen due diligence and training efforts consistent with the OECD Guidance, thereby improving the quality and completeness of supply chain information available to us;
- Encourage our Direct Suppliers to continue to enforce their respective Conflict Minerals policies;
- Continue to communicate and provide training on our Policy, grievance mechanism requirements,
- compliance expectations and information to our present Direct Suppliers and future direct suppliers;

• Introduce RBA tools into our due diligence program to assist in our determination of our Direct Suppliers' compliance with our RSP;

• Continue training our employees responsible for the procurement of electronics and those in related supporting roles, including through programs made available by RMI;

• Continue to enhance our data assurance process with our Direct Suppliers;

- Encourage our Direct Suppliers to receive training and other information on Conflict Minerals made available by RMI or RBA; and
- We will consider the conclusions of the Assessment Study in our review of the due diligence practices for Conflict Minerals.

E. Independent Private Sector Audit

An independent private sector audit is not required for this Report.

Conflict Minerals Policy

The SEC requires our company to disclose if our products contain certain minerals (gold, tin, tungsten, and tantalum, which are referred to as "conflict minerals") that:

- Originate in one of the Covered Countries; and
- Contribute to the financing of armed groups that are committing human rights abuses.

PMI's policy and due diligence process on conflict minerals prescribes that PMI:

- 1. Not to knowingly procure conflict minerals that originate from a Covered Country; and
- 2. Demand that our direct suppliers undertake reasonable due diligence in their respective supply chains to assure the same

unless those minerals are determined to be compliant by the Responsible Minerals Assurance Process.

| Subject Mineral | Smelter or Refiner Name | Country Location of Smelter or Refiner |
|--------------------|---|---|
| Gold | 8853 S.p.A.* | ITALY |
| Gold | Advanced Chemical Company* | UNITED STATES OF AMERICA |
| Gold | Agosi AG* | GERMANY |
| Gold | Aida Chemical Industries Co., Ltd. * | JAPAN |
| Gold | Al Etihad Gold Refinery DMCC* | UNITED ARAB EMIRATES |
| Gold | Alexy Metals** | UNITED STATES OF AMERICA |
| 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 | Augmont Enterprises Private Limited** | INDIA |
| 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 | C.I Metales Procesados Industriales SAS** | COLOMBIA |
| Gold | CCR Refinery - Glencore Canada Corporation* | CANADA |
| Gold | Cendres + Metaux S.A. * | SWITZERLAND |
| Gold | Chimet S.p.A. * | ITALY |
| Gold | Chugai Mining* | JAPAN |
| Gold | DODUCO Contacts and Refining GmbH* | GERMANY |
| Gold | Dowa* | JAPAN |
| Gold | DSC (Do Sung Corporation) * | SOUTH KOREA |
| Gold | Eco-System Recycling Co., Ltd. East Plant* | JAPAN |
| Gold | Eco-System Recycling Co., Ltd. North Plant* | JAPAN |
| Gold | Eco-System Recycling Co., Ltd. West Plant* | JAPAN |
| Gold | Emirates Gold DMCC* | UNITED ARAB EMIRATES |
| Gold | Geib Refining Corporation* | UNITED STATES OF AMERICA |
| Gold | GGC Gujrat Gold Centre Pvt. Ltd.** | INDIA |
| Gold | Gold Refinery of Zijin Mining Group Co., Ltd.* | CHINA |
| Gold | Heimerle + Meule GmbH* | GERMANY |
| Gold | Heraeus Germany GmbH Co. KG* | GERMANY |
| Gold | Heraeus Metals Hong Kong Ltd. * | CHINA |
| 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 Novosibirsk Refinery* | RUSSIAN FEDERATION |

Appendix B - List of SORs identified by our Direct Suppliers as part of the supply chain for Covered Products⁷

| 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 | Korea Zinc Co., Ltd.* | SOUTH KOREA |
| Gold | L'Orfebre S.A.* | ANDORRA |
| Gold | LS-NIKKO Copper Inc. * | SOUTH KOREA |
| Gold | LT Metal Ltd. * | SOUTH KOREA |
| Gold | Marsam Metals* | BRAZIL |
| Gold | Materion* | UNITED STATES OF AMERICA |
| Gold | Matsuda Sangyo Co., Ltd.* | JAPAN |
| Gold | Metal Concentrators SA (Pty) Ltd.* | SOUTH AFRICA |
| 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 | Navoi Mining and Metallurgical Combinat* | UZBEKISTAN |
| Gold | NH Recytech Company* | SOUTH KOREA |
| 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 | 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 | SAFINA A.S.* | CZECHIA |
| Gold | Samduck Precious Metals* | SOUTH KOREA |
| Gold | SAXONIA Edelmetalle GmbH* | GERMANY |
| Gold | SEMPSA Joyeria Plateria S.A.* | SPAIN |
| Gold | Shandong Gold Smelting Co., Ltd.* | CHINA |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.* | CHINA |

| Gold | Sichuan Tianze Precious Metals Co., Ltd.* | CHINA |
|----------|---|---------------------------------|
| Gold | Singway Technology Co., Ltd.* | TAIWAN, REPUBLIC OF |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals* | RUSSIAN FEDERATION |
| Gold | Solar Applied Materials Technology Corp.* | TAIWAN, REPUBLIC OF |
| Gold | Sumitomo Metal Mining Co., Ltd.* | JAPAN |
| Gold | SungEel HiMetal Co., Ltd.* | SOUTH KOREA |
| Gold | T.C.A S.p.A* | ITALY |
| Gold | Tanaka Kikinzoku Kogyo K.K. * | JAPAN |
| Gold | Tokuriki Honten Co., Ltd.* | JAPAN |
| Gold | TOO Tau-Ken-Altyn* | KAZAKHSTAN |
| Gold | Torecom* | SOUTH KOREA |
| 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 | AMG Brasil* | BRAZIL |
| 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 | H.C. Starck Hermsdorf GmbH* | GERMANY |
| Tantalum | H.C. Starck Inc.* | UNITED STATES OF AMERICA |
| 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 JinXin Nonferrous Metals Co., Ltd.* | CHINA |
| Tantalum | Jiujiang Tanbre Co., Ltd.* | CHINA |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd.* | CHINA |
| Tantalum | KEMET de Mexico* | MEXICO |
| Tantalum | Meta Materials* | NORTH MACEDONIA, REPUBLIC OF |
| 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 | QuantumClean* | UNITED STATES OF AMERICA |
| Tantalum | Resind Industria e Comercio Ltda.* | BRAZIL |

| Tantalum | Solikamsk Magnesium Works OAO* | RUSSIAN FEDERATION |
|----------|---|--------------------------|
| Tantalum | Taki Chemical Co., Ltd.* | JAPAN |
| Tantalum | TANIOBIS Co., Ltd.* | THAILAND |
| Tantalum | TANIOBIS GmbH* | GERMANY |
| Tantalum | TANIOBIS Japan Co., Ltd.* | JAPAN |
| Tantalum | TANIOBIS Smelting GmbH & Co. KG* | GERMANY |
| Tantalum | Telex Metals* | UNITED STATES OF AMERICA |
| Tantalum | Ulba Metallurgical Plant JSC* | KAZAKHSTAN |
| Tantalum | XIMEI RESOURCES (GUANGDONG) LIMITED* | CHINA |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd.* | CHINA |
| Tantalum | Yanling Jincheng Tantalum & Niobium Co., Ltd.* | CHINA |
| Tin | Alpha* | UNITED STATES OF AMERICA |
| 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 | CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda** | BRAZIL |
| Tin | CRM Synergies* | SPAIN |
| Tin | CV Venus Inti Perkasa** | INDONESIA |
| Tin | Dowa* | JAPAN |
| Tin | EM Vinto* | BOLIVIA |
| Tin | Estanho de Rondonia S.A.** | BRAZIL |
| Tin | Fenix Metals* | POLAND |
| 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 | Gejiu Zili Mining And Metallurgy Co., Ltd.* | CHINA |
| Tin | Guangdong Hanhe Non-Ferrous Metal Co., Ltd.* | CHINA |
| Tin | Huichang Jinshunda Tin Co., Ltd.* | CHINA |
| Tin | HuiChang Hill Tin Industry Co., Ltd.* | CHINA |
| Tin | Jiangxi New Nanshan Technology Ltd.* | CHINA |
| Tin | Luna Smelter, Ltd.* | RWANDA |
| Tin | Ma'anshan Weitai Tin Co., 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 | O.M. Manufacturing (Thailand) Co., Ltd.* | THAILAND |
| Tin | O.M. Manufacturing Philippines, Inc.* | PHILIPPINES |
| Tin | Operaciones Metalurgicas S.A.* | BOLIVIA |
| Tin | PT Artha Cipta Langgeng* | INDONESIA |
| Tin | PT ATD Makmur Mandiri Jaya* | INDONESIA |
| Tin | PT Babel Inti Perkasa* | INDONESIA |

| Tin | PT Babel Surya Alam Lestari* | INDONESIA |
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| Tin | PT Bangka Serumpun* | INDONESIA |
| Tin | PT Bukit Timah** | INDONESIA |
| Tin | PT Menara Cipta Mulia* | INDONESIA |
| Tin | PT Mitra Stania Prima* | INDONESIA |
| Tin | PT Mitra Sukses Globalindo** | INDONESIA |
| Tin | PT Prima Timah Utama* | INDONESIA |
| Tin | PT Rajawali Rimba Perkasa* | 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 Timah Nusantara** | INDONESIA |
| Tin | PT Timah Tbk Kundur* | INDONESIA |
| Tin | PT Timah Tbk Mentok* | INDONESIA |
| Tin | PT Tinindo Inter Nusa* | INDONESIA |
| Tin | Resind Industria e Comercio Ltda.* | BRAZIL |
| Tin | Rui Da Hung* | TAIWAN, REPUBLIC OF |
| Tin | Soft Metais Ltda.* | BRAZIL |
| Tin | Super Ligas** | BRAZIL |
| Tin | Thai Nguyen Mining and Metallurgy Co., Ltd.* | VIETNAM |
| Tin | Thaisarco* | THAILAND |
| Tin | Tin Smelting Branch of Yunnan Tin Co., Ltd.** | CHINA |
| Tin | Tin Technology & Refining* | UNITED STATES OF AMERICA |
| Tin | White Solder Metalurgia e Mineracao Ltda.* | BRAZIL |
| Tin | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.* | CHINA |
| Tin | Yunnan Yunfan Non-ferrous Metals Co., Ltd.* | CHINA |
| Tungsten | A.L.M.T. Corp.* | JAPAN |
| Tungsten | ACL Metais Eireli* | BRAZIL |
| Tungsten | Albasteel Industria e Comercio de Ligas Para Fundicao Ltd.** | BRAZIL |
| Tungsten | Asia Tungsten Products Vietnam Ltd.* | VIETNAM |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd.* | CHINA |
| Tungsten | China Molybdenum Tungsten Co., Ltd.* | CHINA |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd.* | CHINA |
| Tungsten | Cronimet Brasil Ltda* | BRAZIL |
| Tungsten | Fujian Ganmin RareMetal 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 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 | Hydrometallurg, JSC* | RUSSIAN FEDERATION |
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| Tungsten | Japan New Metals Co., Ltd.* | JAPAN |
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| 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 | Jingmen Dewei GEM Tungsten Resources Recycling Co., Ltd.** | CHINA |
| Tungsten | JSC "Kirovgrad Hard Alloys Plant"* | RUSSIAN FEDERATION |
| Tungsten | Kennametal Fallon* | UNITED STATES OF AMERICA |
| Tungsten | Kennametal Huntsville* | UNITED STATES OF AMERICA |
| Tungsten | KGETS Co., Ltd.* | SOUTH KOREA |
| Tungsten | Lianyou Metals Co., Ltd.* | TAIWAN, REPUBLIC OF |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd.* | CHINA |
| Tungsten | Masan High-Tech Materials* | VIETNAM |
| Tungsten | Moliren Ltd.* | RUSSIAN FEDERATION |
| Tungsten | Niagara Refining LLC* | UNITED STATES OF AMERICA |
| Tungsten | NPP Tyazhmetprom LLC** | RUSSIAN FEDERATION |
| Tungsten | Philippine Chuangxin Industrial Co., Inc.* | PHILIPPINES |
| Tungsten | TANIOBIS Smelting GmbH & Co. KG* | GERMANY |
| Tungsten | Unecha Refractory metals plant* | RUSSIAN FEDERATION |
| Tungsten | Wolfram Bergbau und Hutten AG* | AUSTRIA |
| Tungsten | Woltech Korea Co., Ltd.* | SOUTH KOREA |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd.* | CHINA |
| Tungsten | Xiamen Tungsten Co., Ltd.* | CHINA |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.* | CHINA |

 $^{^{7}}$ SORs that were designated, to our knowledge, as Compliant as of December 31, 2021 are marked with an asterisk (unless stated otherwise). SORs that were designated, to our knowledge, as Active as of December 31, 2021 are marked with two asterisks (unless stated otherwise).