

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

**FORM SD
Specialized Disclosure Report**

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

Delaware
(State or other
jurisdiction of
incorporation)

0-27266
(Commission File
Number)

36-3154957
(IRS Employer
Identification No.)

750 North Common Drive
Aurora, IL
(Address of principal executive offices)

60504
(Zip Code)

Thomas P. Minichiello
Senior Vice President, Chief Financial Officer,
Treasurer and Secretary
(630) 898-2500
(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, 2015.
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Section 1 - Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

In accordance with disclosure requirements promulgated by the U. S. Securities and Exchange Commission, Westell Technologies, Inc. (the "Company") has undertaken efforts to determine its conflict minerals reporting requirements for the period from January 1 to December 31, 2015. Based on the Company's reasonable country of origin inquiry, it exercised due diligence on the source and chain of custody of its conflict minerals for the reporting period, as discussed in Exhibit 1.01 hereto.

Conflict Minerals Disclosure

The Company has filed this Specialized Disclosure Report and the associated Conflict Minerals Report, which appears as the Exhibit 1.01 hereto and is publicly available on the Company's website at <http://www.westell.com/about-us/product-compliance/conflict-minerals>.

Item 1.02 Exhibit

The Company's Conflict Minerals Report is provided as Exhibit 1.01 hereto.

Section 2 - Exhibits

Item 2.01 Exhibits

The following exhibit is filed as part of this report.

Exhibit 1.01 - Westell Technologies Inc's Conflict Minerals Report for the period from January 1 to December 31, 2015, as required by Items 1.01 and 1.02 of this Form.

SIGNATURES

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

WESTELL TECHNOLOGIES, INC.

(Registrant)

By: /s/ Thomas P. Minichiello

May 25, 2016

Thomas P. Minichiello

(Date)

Senior Vice President, Chief Financial Officer,
Treasurer and Secretary

CONFLICT MINERALS REPORT OF
Westell Technologies, Inc.
IN ACCORDANCE WITH RULE 13p-1
UNDER THE SECURITIES EXCHANGE ACT OF 1934
FOR THE REPORTING PERIOD FROM
JANUARY 1 TO DECEMBER 31, 2015

I. Introduction

This is the Conflict Minerals¹ Report of Westell Technologies, Inc. (“we,” “our,” “us,” “Westell,” or the “Company”) prepared for calendar year 2015 (the “Reporting Period”) in accordance with Rule 13p-1 (“Rule 13p-1”) under the Securities Exchange Act of 1934 (the “Act”).

In accordance with Rule 13p-1, we undertook efforts to determine the content and source of the minerals within our products. The Company designed its efforts in conformity with the internationally recognized due diligence framework put forth in the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas OECD (2013)*, *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* (“OECD Due Diligence Guidance” or the “OECD framework”) and related Supplements.

The statements below are based on the activities performed to date and in good faith by Westell and are based on the infrastructure and information available at the time of this filing. Factors that could affect the accuracy of these statements include, but are not limited to, incomplete supplier data or available smelter data, errors or omissions by suppliers or smelters, evolving definition and confirmation of smelters, incomplete information from industry or other third-party sources, continuing guidance regarding the final rules from the Securities and Exchange Commission (the “SEC”), and other issues.

II. Overview

Company Profile

Westell, is a leading provider of in-building wireless, intelligent site management, cell site optimization, and outside plant solutions focused on innovation and differentiation at the edge of telecommunication networks, where end users connect. The Company’s comprehensive set of products and solutions enable telecommunication service providers, cell tower operators, and other network operators to reduce operating costs and improve network performance. With millions of products successfully deployed worldwide, the Company is a trusted partner for transforming networks into high quality, reliable systems.

¹The term “conflict mineral” is defined in Section 1502(e)(4) of the Dodd-Frank Wall Street Reform and Consumer Protection Act as (A) columbite-tantalite, also known as coltan (the metal ore from which tantalum is extracted); cassiterite (the metal ore from which tin is extracted); gold; wolframite (the metal ore from which tungsten is extracted); or their derivatives; or (B) any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo (“DRC”) or an adjoining country (collectively, the “covered countries”).

Reasonable Country of Origin Inquiry Information

We determined that, during 2015, conflict minerals were likely necessary to the functionality or production of products we manufactured or contracted to manufacture. We have conducted a good faith reasonable country of origin inquiry (“RCOI”) to determine whether the necessary conflict minerals originated in the DRC or an adjoining country or came from recycled or scrap sources.

Westell’s RCOI process included conducting an inquiry of our direct suppliers using the Conflict-Free Sourcing Initiative’s (“CFSI”) Conflict Minerals Reporting Template (“CMRT”). Based on the results of our RCOI, which indicated sourcing from the covered countries, we exercised due diligence on the source and chain of custody of the conflict minerals in accordance with the OECD framework. Our due diligence efforts are discussed further in this

Conflict Minerals Report.

The Company, as a purchaser of component parts, is many steps removed from the mining of conflict minerals. We do not purchase raw ore or unrefined conflict minerals and we conduct no purchasing activities directly in the covered countries.

Due Diligence Program Design

The Company designed its conflict minerals program to conform, in all material respects, with the five-step framework of the OECD Due Diligence Guidance and the related Supplements, specifically as they relate to our position in the minerals supply chain as a “downstream” company:

Step 1: Establish strong company management systems

Step 2: Identify and assess risks in the supply chain

Step 3: Design and implement a strategy to respond to identified risks

Step 4: Carry out independent third-party audit of smelter/refiner's due diligence practices

Step 5: Report annually on supply chain due diligence.

III. Due Diligence Measures Performed by Westell

The following describes the measures taken with respect to the Reporting Period to reasonably determine the country of origin and to exercise due diligence on the mineral supply chain in conformance with the OECD Due Diligence Guidance.

Step 1: Establish strong company management systems

- a. Conflict minerals team - Westell's conflict minerals team includes individuals from the appropriate business units and departments, including compliance, finance, procurement, sales, and legal. Individuals in upper management roles are involved to ensure critical information, including the Company's Conflict Minerals Policy reaches relevant employees and suppliers. We also engaged a consulting firm to assist us with our compliance efforts.
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- b. Conflict Minerals Policy - Our Conflict Minerals Policy highlights Westell's commitment to comply with the reporting and due diligence obligations required by the SEC related to conflict minerals and establishes the expectations from our suppliers. The policy resides on our corporate website at <http://www.westell.com/about-us/product-compliance/conflict-minerals/>. It is reviewed annually and will be updated, if necessary.
- c. Internal engagement - We developed a training program for internal use to educate relevant employees on our conflict minerals program and reporting obligations.
- d. Supplier engagement - Westell communicated its Conflict Minerals Policy and provided educational materials to our queried suppliers. Suppliers were provided information on the conflict minerals disclosure requirements as well as recommendations for developing, implementing, and documenting a conflict minerals compliance program.
- e. Company level grievance mechanism - As recommended by the OECD Due Diligence Guidance, Westell has a grievance mechanism that serves as a risk-awareness system for conflict minerals issues. Stakeholders can communicate directly and confidentially with members of our conflict minerals team.
- f. Records management - Westell maintains records relating to our conflict minerals program in accordance with its record retention policy and applicable guidelines.

Step 2: Identify and assess risks in the supply chain

We performed the following steps as part of our risk assessment process:

- a. Identified products in scope - Our conflict minerals team conducted a detailed review of the products manufactured or contracted to be manufactured during the Reporting Period to identify products that should be deemed in-scope.
- b. Conducted RCOI - Westell utilized the industry-developed CMRT to query our in-scope suppliers for conflict minerals information. We requested this information from the suppliers who provide materials and components for the products deemed in-scope by our conflict minerals team. We evaluated the responses from the templates submitted by our suppliers to determine our reporting obligation based on this RCOI. Completed additional follow-up - Westell contacted the suppliers that did not respond to our request for conflict minerals information by the requested date. We also worked to clarify and validate the accuracy of information provided by our suppliers.
- c. Identified smelters or refiners ("SORs") - Using our suppliers' responses in their CMRTs, we compiled a list of SORs in our supply chain. We have provided the list of our identified SORs as Appendix II to this report.

Step 3: Design and implement a strategy to respond to identified risks

We performed the following steps as part of our risk management plan:

- a. Designed and implemented a plan - Westell used established risk rating criteria to evaluate suppliers based on the responses provided within their CMRT as well as any additional documentation furnished to support those responses and the suppliers' due diligence processes. The resulting risk ratings were used to develop specific supplier outreach and training to address the identified risks and to take corrective actions with suppliers found not in compliance with Westell's Conflict Minerals Policy.
 - b. Verified SORs - As part of the risk mitigation process, the Company reconciled the list of SORs collected from suppliers to the list of SORs facilities identified by the CFSI's Conflict-Free Smelter Program.
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Step 4: Carry out independent third-party audit of smelter/refiner's due diligence practices

Westell is relying on published lists from CFSI, London Bullion Market Association (“LBMA”) and Responsible Jewelry Council (“RJC”) to confirm the existence and verify the conflict-free status of SORs identified during our due diligence. As previously disclosed, the Company, as a purchaser of component parts, is many steps removed from the mining of conflict minerals. We do not purchase raw ore or unrefined conflict minerals and we conduct no purchasing activities directly in the covered countries.

Step 5: Report annually on supply chain due diligence

Accordingly, this Conflict Minerals Report has been filed with the SEC and is available on our website at <http://www.westell.com/about-us/product-compliance/conflict-minerals/>.

IV. Product Description; Processing Facilities

Product Description - The Company designs, develops, assembles and markets a wide variety of products and solutions. In-building wireless solutions include distributed antenna systems (“DAS”) interface panels, high-performance digital repeaters and bi-directional amplifiers (“BDAs”), and system components and antennas, all used by wireless service providers and neutral-party hosts to fine tune radio frequency (“RF”) signals that helps extend coverage to areas not served well or at all by traditional cell sites. Intelligent site management solutions include a suite of Remote monitoring and control devices which, when combined with the Company’s Optima management system, provides comprehensive machine-to-machine (“M2M”) communications that enable operators to remotely monitor, manage, and control site infrastructure and support systems. Cell site optimization solutions consist of tower mounted amplifiers (“TMAs”), small outdoor-hardened units mounted next to antennas on cell towers, enabling wireless service providers to improve the overall performance of a cell site, including increasing data throughput and reducing dropped connections. Outside plant solutions, which are sold to wireline and wireless service providers as well as industrial network operators, consist of a broad range of offerings, including cabinets, enclosures, and mountings; synchronous optical networks/time division multiplexing (“SONET/TDM”) network interface units; power distribution units; copper and fiber connectivity panels; hardened Ethernet switches; and systems integration services.

Processing Facilities - Based on our due diligence process and the information received from our suppliers, the facilities listed on Appendix II to this Report were identified by the Company’s suppliers as the smelters and refiners of the tin, tantalum, tungsten and/or gold present in and necessary to the functionality of products manufactured by the Company in the Reporting Period. The information from our suppliers is still evolving and may contain company level declarations. As such, this smelter list is presented in good faith as the best information we have to date. This list may contain smelters that are not in our supply chain and there may be other smelters not yet identified in our due diligence process. We will continue to update the list as our information and the relevant third-party data from CFSI, LBMA, and RJC improves.

V. Future Due Diligence

We will continue to communicate our expectations and information requirements to our direct suppliers. Over time, we anticipate that the amount of information globally available on the traceability and sourcing of these ores will increase and improve our knowledge. We will continue to make inquiries to our direct suppliers and undertake additional risk assessments when potentially relevant changes in facts or circumstances are identified. If we become aware of a supplier whose due diligence needs improvement, we may continue the trade relationship while that supplier improves its compliance program or terminate the relationship in appropriate circumstances. We expect our suppliers to take similar measures with their suppliers to ensure alignment throughout the supply chain.

In addition to those above, the Company will undertake the following steps during the next compliance period:

- Continue to collect responses from suppliers using the most recent revision of the CMRT.
- Develop specific supplier outreach and training to address identified risks and take corrective actions with suppliers identified as high risk via our risk taking criteria.
- Engage with suppliers that did not provide a response in 2015 or provided incomplete responses to help with our data collections for 2016.
- Monitor and track performance of risk mitigation efforts.
- Compare and validate RCOI results to information collected via independent conflict-free smelter validation programs such as the CFSI.
- Continue to allow verified conflict-free material from the region to enter our supply chain.

VI. Independent Private Sector Audit

Pursuant to SEC rules and related guidance, an independent private sector audit of this report was not required for calendar year 2015.

Appendix I - Countries of Origin

This information is provided in good faith and is based on the information collected from Westell's suppliers.

| | | |
|--------------------------|-------------|--------------------------|
| Angola | France | Portugal |
| Argentina | Germany | Republic of Congo |
| Australia | Guyana | Russia |
| Austria | Hungary | Rwanda |
| Belgium | India | Sierra Leone |
| Bolivia | Indonesia | Singapore |
| Brazil | Ireland | Slovakia |
| Burundi | Israel | South Africa |
| Cambodia | Japan | South Korea |
| Canada | Kazakhstan | Spain |
| Central African Republic | Kenya | Suriname |
| Chile | Laos | Switzerland |
| China | Luxembourg | Taiwan |
| Colombia | Madagascar | Tanzania |
| Côte D'Ivoire | Malaysia | Thailand |
| Czech Republic | Mongolia | Uganda |
| Djibouti | Mozambique | United Kingdom |
| Ecuador | Namibia | United States of America |
| Egypt | Netherlands | Vietnam |
| Estonia | Nigeria | Zambia |
| Ethiopia | Peru | |

Appendix II -SORs

Based on our due diligence process and the information received from our suppliers, the following facilities were identified by the Company's suppliers as the SORs of the tin, tantalum, tungsten and/or gold present in and necessary to the functionality of products manufactured by the Company in the Reporting Period. The list also includes the status of each SOR, which was compiled based on information provided by the CFSI's Conflict-Free Smelter Program.

| Metal | Standard Smelter Names | Country | Conflict-Free Status |
|--------------|---------------------------------------------------------------|----------------------|-----------------------------|
| Gold | Advanced Chemical Company | UNITED STATES | Not Determined |
| Gold | Aida Chemical Industries Co., Ltd. | JAPAN | Conflict-Free |
| Gold | Aktyubinsk Copper Company TOO | KAZAKHSTAN | Not Determined |
| Gold | Al Etihad Gold Refinery DMCC | UNITED ARAB EMIRATES | Not Determined |
| Gold | Allgemeine Gold-und Silberscheideanstalt A.G. | GERMANY | Conflict-Free |
| Gold | Almalyk Mining and Metallurgical Complex (AMMC) | UZBEKISTAN | Not Determined |
| Gold | AngloGold Ashanti Córrego do Sítio Mineração | BRAZIL | Conflict-Free |
| Gold | Argor-Heraeus SA | SWITZERLAND | Conflict-Free |
| Gold | Asahi Pretec Corporation | JAPAN | Conflict-Free |
| Gold | Asahi Refining Canada Limited | CANADA | Conflict-Free |
| Gold | Asahi Refining USA Inc. | UNITED STATES | Conflict-Free |
| Gold | Asaka Riken Co., Ltd. | JAPAN | Conflict-Free |
| Gold | Atasay Kuyumculuk Sanayi Ve Ticaret A.S. | TURKEY | Not Determined |
| Gold | Aurubis AG | GERMANY | Conflict-Free |
| Gold | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | PHILIPPINES | Conflict-Free |
| Gold | Bauer Walser AG | GERMANY | Not Determined |
| Gold | Boliden AB | SWEDEN | Conflict-Free |
| Gold | C. Hafner GmbH + Co. KG | GERMANY | Conflict-Free |
| Gold | Caridad | MEXICO | Not Determined |
| Gold | CCR Refinery - Glencore Canada Corporation | CANADA | Conflict-Free |
| Gold | Cendres + Métaux SA | SWITZERLAND | Not Determined |
| Gold | Chimet S.p.A. | ITALY | Conflict-Free |
| Gold | Chugai Mining | JAPAN | Not Determined |
| Gold | Daejin Indus Co., Ltd. | KOREA, REPUBLIC OF | Not Determined |
| Gold | Daye Non-Ferrous Metals Mining Ltd. | CHINA | Not Determined |
| Gold | DODUCO GmbH | GERMANY | Conflict-Free |
| Gold | Dowa | JAPAN | Conflict-Free |
| Gold | DSC (Do Sung Corporation) | KOREA, REPUBLIC OF | Not Determined |
| Gold | Eco-System Recycling Co., Ltd. | JAPAN | Conflict-Free |
| Gold | Elemental Refining, LLC | UNITED STATES | Conflict-Free |
| Gold | Emirates Gold DMCC | UNITED ARAB EMIRATES | Conflict-Free |
| Gold | Faggi Enrico S.p.A. | ITALY | Not Determined |
| Gold | Gansu Seemine Material Hi-Tech Co., Ltd. | CHINA | Not Determined |
| Gold | Geib Refining Corporation | UNITED STATES | Not Determined |
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM | CHINA | Not Determined |
| Gold | Guangdong Jinding Gold Limited | CHINA | Not Determined |

| | | | |
|------|-----------------------------------------------------------------------|--------------------|----------------|
| Gold | Guoda Safina High-Tech Environmental Refinery Co., Ltd. | CHINA | Not Determined |
| Gold | Hangzhou Fuchunjiang Smelting Co., Ltd. | CHINA | Not Determined |
| Gold | Heimerle + Meule GmbH | GERMANY | Conflict-Free |
| Gold | Heraeus Ltd. Hong Kong | CHINA | Conflict-Free |
| Gold | Heraeus Precious Metals GmbH & Co. KG | GERMANY | Conflict-Free |
| Gold | Hunan Chenzhou Mining Co., Ltd. | CHINA | Not Determined |
| Gold | Hwasung CJ Co., Ltd. | KOREA, REPUBLIC OF | Not Determined |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Company Limited | CHINA | Conflict-Free |
| Gold | Ishifuku Metal Industry Co., Ltd. | JAPAN | Conflict-Free |
| Gold | Istanbul Gold Refinery | TURKEY | Conflict-Free |
| Gold | Japan Mint | JAPAN | Conflict-Free |
| Gold | Jiangxi Copper Company Limited | CHINA | Conflict-Free |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant | RUSSIAN FEDERATION | Conflict-Free |
| Gold | JSC Uralelectromed | RUSSIAN FEDERATION | Conflict-Free |
| Gold | JX Nippon Mining & Metals Co., Ltd. | JAPAN | Conflict-Free |
| Gold | Kazakhmys Smelting LLC | KAZAKHSTAN | Not Determined |
| Gold | Kazzinc | KAZAKHSTAN | Conflict-Free |
| Gold | Kennecott Utah Copper LLC | UNITED STATES | Conflict-Free |
| Gold | KGHM Polska MiedŹ Spó³ka Akcyjna | POLAND | Not Determined |
| Gold | Kojima Chemicals Co., Ltd. | JAPAN | Conflict-Free |
| Gold | Korea Metal Co., Ltd. | KOREA, REPUBLIC OF | Not Determined |
| Gold | Korea Zinc Co. Ltd. | KOREA, REPUBLIC OF | Not Determined |
| Gold | Kyrgyzaltyn JSC | KYRGYZSTAN | Not Determined |
| Gold | Lingbao Gold Company Limited | CHINA | Not Determined |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd. | CHINA | Not Determined |
| Gold | LS-NIKKO Copper Inc. | KOREA, REPUBLIC OF | Conflict-Free |
| Gold | Luoyang Zijin Yinhui Gold Refinery Co., Ltd. | CHINA | Not Determined |
| Gold | Materion | UNITED STATES | Conflict-Free |
| Gold | Matsuda Sangyo Co., Ltd. | JAPAN | Conflict-Free |
| Gold | Metahub Industries Sdn. Bhd. | MALAYSIA | Not Determined |
| Gold | Metalor Technologies (Hong Kong) Ltd. | CHINA | Conflict-Free |
| Gold | Metalor Technologies (Singapore) Pte., Ltd. | SINGAPORE | Conflict-Free |
| Gold | Metalor Technologies (Suzhou) Ltd. | CHINA | Not Determined |
| Gold | Metalor Technologies SA | SWITZERLAND | Conflict-Free |
| Gold | Metalor USA Refining Corporation | UNITED STATES | Conflict-Free |
| Gold | METALÚRGICA MET-MEX PEÑALES, S.A. DE C.V | MEXICO | Conflict-Free |
| Gold | Mitsubishi Materials Corporation | JAPAN | Conflict-Free |
| Gold | Mitsui Mining and Smelting Co., Ltd. | JAPAN | Conflict-Free |
| Gold | MMTC-PAMP India Pvt., Ltd. | INDIA | Conflict-Free |
| Gold | Morris and Watson | NEW ZEALAND | Not Determined |
| Gold | Moscow Special Alloys Processing Plant | RUSSIAN FEDERATION | Conflict-Free |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.ª. | TURKEY | Conflict-Free |
| Gold | Navoi Mining and Metallurgical Combinat | UZBEKISTAN | Not Determined |
| Gold | Nihon Material Co., Ltd. | JAPAN | Conflict-Free |

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|------|-----------------------------------------------------------------------------|--------------------|----------------|
| Gold | Ögussa Österreichische Gold- und Silber-Scheideanstalt GmbH | AUSTRIA | Conflict-Free |
| Gold | Ohura Precious Metal Industry Co., Ltd. | JAPAN | Conflict-Free |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | RUSSIAN FEDERATION | Conflict-Free |
| Gold | OJSC Kolyma Refinery | RUSSIAN FEDERATION | Not Determined |
| Gold | OJSC Novosibirsk Refinery | RUSSIAN FEDERATION | Conflict-Free |
| Gold | PAMP SA | SWITZERLAND | Conflict-Free |
| Gold | Penglai Penggang Gold Industry Co., Ltd. | CHINA | Not Determined |
| Gold | Prioksky Plant of Non-Ferrous Metals | RUSSIAN FEDERATION | Conflict-Free |
| Gold | PT Aneka Tambang (Persero) Tbk | INDONESIA | Conflict-Free |
| Gold | PX Précinox SA | SWITZERLAND | Conflict-Free |
| Gold | Rand Refinery (Pty) Ltd. | SOUTH AFRICA | Conflict-Free |
| Gold | Republic Metals Corporation | UNITED STATES | Conflict-Free |
| Gold | Royal Canadian Mint | CANADA | Conflict-Free |
| Gold | SAAMP | FRANCE | Not Determined |
| Gold | Sabin Metal Corp. | UNITED STATES | Not Determined |
| Gold | Samduck Precious Metals | KOREA, REPUBLIC OF | Not Determined |
| Gold | SAMWON Metals Corp. | KOREA, REPUBLIC OF | Not Determined |
| Gold | SAXONIA Edelmetalle GmbH | GERMANY | Not Determined |
| Gold | Schone Edelmetaal B.V. | NETHERLANDS | Conflict-Free |
| Gold | SEMPSA Joyería Platería SA | SPAIN | Conflict-Free |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | CHINA | Not Determined |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd. | CHINA | Conflict-Free |
| Gold | Sichuan Tianze Precious Metals Co., Ltd. | CHINA | Conflict-Free |
| Gold | Singway Technology Co., Ltd. | TAIWAN | Conflict-Free |
| Gold | So Accurate Group, Inc. | UNITED STATES | Not Determined |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals | RUSSIAN FEDERATION | Conflict-Free |
| Gold | Solar Applied Materials Technology Corp. | TAIWAN | Conflict-Free |
| Gold | Sumitomo Metal Mining Co., Ltd. | JAPAN | Conflict-Free |
| Gold | T.C.A S.p.A | ITALY | Conflict-Free |
| Gold | Tanaka Kikinzoku Kogyo K.K. | JAPAN | Conflict-Free |
| Gold | The Refinery of Shandong Gold Mining Co., Ltd. | CHINA | Conflict-Free |
| Gold | Tokuriki Honten Co., Ltd. | JAPAN | Conflict-Free |
| Gold | Tongling Nonferrous Metals Group Co., Ltd. | CHINA | Not Determined |
| Gold | Tony Goetz NV | BELGIUM | Not Determined |
| Gold | Torecom | KOREA, REPUBLIC OF | Not Determined |
| Gold | Umicore Brasil Ltda. | BRAZIL | Conflict-Free |
| Gold | Umicore Precious Metals Thailand | THAILAND | Conflict-Free |
| Gold | Umicore SA Business Unit Precious Metals Refining | BELGIUM | Conflict-Free |
| Gold | United Precious Metal Refining, Inc. | UNITED STATES | Conflict-Free |
| Gold | Valcambi SA | SWITZERLAND | Conflict-Free |
| Gold | Western Australian Mint trading as The Perth Mint | AUSTRALIA | Conflict-Free |
| Gold | WIELAND Edelmetalle GmbH | GERMANY | Not Determined |
| Gold | Yamamoto Precious Metal Co., Ltd. | JAPAN | Conflict-Free |
| Gold | Yokohama Metal Co., Ltd. | JAPAN | Conflict-Free |

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| Gold | Yunnan Copper Industry Co., Ltd. | CHINA | Not Determined |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | CHINA | Conflict-Free |
| Gold | Zijin Mining Group Co., Ltd. Gold Refinery | CHINA | Conflict-Free |
| Tantalum | Avon Specialty Metals Ltd | UNITED KINGDOM | Not Determined |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd. | CHINA | Conflict-Free |
| Tantalum | Conghua Tantalum and Niobium Smeltry | CHINA | Conflict-Free |
| Tantalum | D Block Metals, LLC | UNITED STATES | Conflict-Free |
| Tantalum | Duoluoshan | CHINA | Conflict-Free |
| Tantalum | E.S.R. Electronics | UNITED STATES | Not Determined |
| Tantalum | Exotech Inc. | UNITED STATES | Conflict-Free |
| Tantalum | F&X Electro-Materials Ltd. | CHINA | Conflict-Free |
| Tantalum | FIR Metals & Resource Ltd. | CHINA | Conflict-Free |
| Tantalum | Global Advanced Metals Aizu | JAPAN | Conflict-Free |
| Tantalum | Global Advanced Metals Boyertown | UNITED STATES | Conflict-Free |
| Tantalum | Guangdong Zhiyuan New Material Co., Ltd. | CHINA | Conflict-Free |
| Tantalum | Guizhou Zhenhua Xinyun Technology Ltd., Kaili branch | CHINA | Not Determined |
| Tantalum | H.C. Starck Co., Ltd. | THAILAND | Conflict-Free |
| Tantalum | H.C. Starck GmbH Goslar | GERMANY | Conflict-Free |
| Tantalum | H.C. Starck GmbH Laufenburg | GERMANY | Conflict-Free |
| Tantalum | H.C. Starck Hermsdorf GmbH | GERMANY | Conflict-Free |
| Tantalum | H.C. Starck Inc. | UNITED STATES | Conflict-Free |
| Tantalum | H.C. Starck Ltd. | JAPAN | Conflict-Free |
| Tantalum | H.C. Starck Smelting GmbH & Co.KG | GERMANY | Conflict-Free |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd. | CHINA | Conflict-Free |
| Tantalum | Hi-Temp Specialty Metals, Inc. | UNITED STATES | Conflict-Free |
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd. | CHINA | Conflict-Free |
| Tantalum | Jiangxi Tuohong New Raw Material | CHINA | Conflict-Free |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd. | CHINA | Conflict-Free |
| Tantalum | Jiujiang Tanbre Co., Ltd. | CHINA | Conflict-Free |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd. | CHINA | Conflict-Free |
| Tantalum | KEMET Blue Metals | MEXICO | Conflict-Free |
| Tantalum | KEMET Blue Powder | UNITED STATES | Conflict-Free |
| Tantalum | King-Tan Tantalum Industry Ltd. | CHINA | Conflict-Free |
| Tantalum | LSM Brasil S.A. | BRAZIL | Conflict-Free |
| Tantalum | Metallurgical Products India Pvt., Ltd. | INDIA | Conflict-Free |
| Tantalum | Mineração Taboca S.A. | BRAZIL | Conflict-Free |
| Tantalum | Mitsui Mining & Smelting | JAPAN | Conflict-Free |
| Tantalum | Molycorp Silmet A.S. | ESTONIA | Conflict-Free |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd. | CHINA | Conflict-Free |
| Tantalum | Plansee SE Liezen | AUSTRIA | Conflict-Free |
| Tantalum | Plansee SE Reutte | AUSTRIA | Conflict-Free |
| Tantalum | QuantumClean | UNITED STATES | Conflict-Free |
| Tantalum | Resind Indústria e Comércio Ltda. | BRAZIL | Conflict-Free |
| Tantalum | RFH Tantalum Smeltry Co., Ltd. | CHINA | Conflict-Free |
| Tantalum | Solikamsk Magnesium Works OAO | RUSSIAN FEDERATION | Conflict-Free |

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|----------|---------------------------------------------------------------------------------------|---------------|----------------|
| Tantalum | Taki Chemicals | JAPAN | Conflict-Free |
| Tantalum | Telex Metals | UNITED STATES | Conflict-Free |
| Tantalum | Tranzact, Inc. | UNITED STATES | Conflict-Free |
| Tantalum | Ulba Metallurgical Plant JSC | KAZAKHSTAN | Conflict-Free |
| Tantalum | XinXing HaoRong Electronic Material Co., Ltd. | CHINA | Conflict-Free |
| Tantalum | Yichun Jin Yang Rare Metal Co., Ltd. | CHINA | Conflict-Free |
| Tantalum | Zhuzhou Cemented Carbide | CHINA | Conflict-Free |
| Tin | Alpha | UNITED STATES | Conflict-Free |
| Tin | An Thai Minerals Company Limited | VIET NAM | Not Determined |
| Tin | An Vinh Joint Stock Mineral Processing Company | VIET NAM | Not Determined |
| Tin | Chenzhou Yunxiang Mining and Metallurgy Company Limited | CHINA | Not Determined |
| Tin | China Tin Group Co., Ltd. | CHINA | Conflict-Free |
| Tin | CNMC (Guangxi) PGMA Co., Ltd. | CHINA | Not Determined |
| Tin | Cooperativa Metalurgica de Rondônia Ltda. | BRAZIL | Conflict-Free |
| Tin | CV Ayi Jaya | INDONESIA | Conflict-Free |
| Tin | CV Dua Sekawan | INDONESIA | Not Determined |
| Tin | CV Gita Pesona | INDONESIA | Conflict-Free |
| Tin | CV Serumpun Sebalai | INDONESIA | Conflict-Free |
| Tin | CV Tiga Sekawan | INDONESIA | Not Determined |
| Tin | CV United Smelting | INDONESIA | Conflict-Free |
| Tin | CV Venus Inti Perkasa | INDONESIA | Conflict-Free |
| Tin | Dowa | JAPAN | Conflict-Free |
| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | VIET NAM | Not Determined |
| Tin | Elmet S.L.U. (Metallo Group) | SPAIN | Conflict-Free |
| Tin | EM Vinto | BOLIVIA | Conflict-Free |
| Tin | Estanho de Rondônia S.A. | BRAZIL | Not Determined |
| Tin | Feinhütte Halsbrücke GmbH | GERMANY | Not Determined |
| Tin | Fenix Metals | POLAND | Conflict-Free |
| Tin | Gejiu Fengming Metalurgy Chemical Plant | CHINA | Not Determined |
| Tin | Gejiu Kai Meng Industry and Trade LLC | CHINA | Not Determined |
| Tin | Gejiu Non-Ferrous Metal Processing Co., Ltd. | CHINA | Conflict-Free |
| Tin | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | CHINA | Not Determined |
| Tin | Gejiu Zili Mining And Metallurgy Co., Ltd. | CHINA | Not Determined |
| Tin | Guanyang Guida Nonferrous Metal Smelting Plant | CHINA | Not Determined |
| Tin | HuiChang Hill Tin Industry Co., Ltd. | CHINA | Not Determined |
| Tin | Huichang Jinshunda Tin Co., Ltd. | CHINA | Not Determined |
| Tin | Jiangxi Ketai Advanced Material Co., Ltd. | CHINA | Conflict-Free |
| Tin | Linwu Xianggui Ore Smelting Co., Ltd. | CHINA | Not Determined |
| Tin | Magnu's Minerais Metais e Ligas Ltda. | BRAZIL | Conflict-Free |
| Tin | Malaysia Smelting Corporation (MSC) | MALAYSIA | Conflict-Free |
| Tin | Melt Metais e Ligas S/A | BRAZIL | Conflict-Free |
| Tin | Metahub Industries Sdn. Bhd. | MALAYSIA | Not Determined |
| Tin | Metallic Resources, Inc. | UNITED STATES | Conflict-Free |
| Tin | Metallo-Chimique N.V. | BELGIUM | Conflict-Free |
| Tin | Mineração Taboca S.A. | BRAZIL | Conflict-Free |

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|-----|--------------------------------------------------|-------------|----------------|
| Tin | Minsur | PERU | Conflict-Free |
| Tin | Mitsubishi Materials Corporation | JAPAN | Conflict-Free |
| Tin | Nankang Nanshan Tin Manufactory Co., Ltd. | CHINA | Not Determined |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company | VIET NAM | Not Determined |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd. | THAILAND | Conflict-Free |
| Tin | O.M. Manufacturing Philippines, Inc. | PHILIPPINES | Conflict-Free |
| Tin | Operaciones Metalurgical S.A. | BOLIVIA | Conflict-Free |
| Tin | Phoenix Metal Ltd. | RWANDA | Not Determined |
| Tin | PT Alam Lestari Kencana | INDONESIA | Not Determined |
| Tin | PT Aries Kencana Sejahtera | INDONESIA | Conflict-Free |
| Tin | PT Artha Cipta Langgeng | INDONESIA | Conflict-Free |
| Tin | PT ATD Makmur Mandiri Jaya | INDONESIA | Conflict-Free |
| Tin | PT Babel Inti Perkasa | INDONESIA | Conflict-Free |
| Tin | PT Bangka Kudai Tin | INDONESIA | Not Determined |
| Tin | PT Bangka Prima Tin | INDONESIA | Conflict-Free |
| Tin | PT Bangka Timah Utama Sejahtera | INDONESIA | Not Determined |
| Tin | PT Bangka Tin Industry | INDONESIA | Conflict-Free |
| Tin | PT Belitung Industri Sejahtera | INDONESIA | Conflict-Free |
| Tin | PT BilliTin Makmur Lestari | INDONESIA | Conflict-Free |
| Tin | PT Bukit Timah | INDONESIA | Conflict-Free |
| Tin | PT Cipta Persada Mulia | INDONESIA | Conflict-Free |
| Tin | PT DS Jaya Abadi | INDONESIA | Conflict-Free |
| Tin | PT Eunindo Usaha Mandiri | INDONESIA | Conflict-Free |
| Tin | PT Fang Di MulTindo | INDONESIA | Not Determined |
| Tin | PT Inti Stania Prima | INDONESIA | Conflict-Free |
| Tin | PT Justindo | INDONESIA | Conflict-Free |
| Tin | PT Karimun Mining | INDONESIA | Not Determined |
| Tin | PT Kijang Jaya Mandiri | INDONESIA | Not Determined |
| Tin | PT Mitra Stania Prima | INDONESIA | Conflict-Free |
| Tin | PT Panca Mega Persada | INDONESIA | Conflict-Free |
| Tin | PT Pelat Timah Nusantara Tbk | INDONESIA | Not Determined |
| Tin | PT Prima Timah Utama | INDONESIA | Conflict-Free |
| Tin | PT Refined Bangka Tin | INDONESIA | Conflict-Free |
| Tin | PT Sariwiguna Binasentosa | INDONESIA | Conflict-Free |
| Tin | PT Seirama Tin Investment | INDONESIA | Not Determined |
| Tin | PT Stanindo Inti Perkasa | INDONESIA | Conflict-Free |
| Tin | PT Sukses Inti Makmur | INDONESIA | Conflict-Free |
| Tin | PT Sumber Jaya Indah | INDONESIA | Conflict-Free |
| Tin | PT Timah (Persero) Tbk Kundur | INDONESIA | Conflict-Free |
| Tin | PT Timah (Persero) Tbk Mentok | INDONESIA | Conflict-Free |
| Tin | PT Tinindo Inter Nusa | INDONESIA | Conflict-Free |
| Tin | PT Tirus Putra Mandiri | INDONESIA | Not Determined |
| Tin | PT Tommy Utama | INDONESIA | Conflict-Free |
| Tin | PT Wahana Perkit Jaya | INDONESIA | Conflict-Free |
| Tin | Resind Indústria e Comércio Ltda. | BRAZIL | Conflict-Free |
| Tin | Rui Da Hung | TAIWAN | Conflict-Free |

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|----------|---------------------------------------------------------------|--------------------|----------------|
| Tin | Soft Metais Ltda. | BRAZIL | Conflict-Free |
| Tin | Thaisarco | THAILAND | Conflict-Free |
| Tin | Tuyen Quang Non-Ferrous Metals Joint Stock Company | VIET NAM | Not Determined |
| Tin | VQB Mineral and Trading Group JSC | VIET NAM | Conflict-Free |
| Tin | White Solder Metalurgia e Mineração Ltda. | BRAZIL | Conflict-Free |
| Tin | Yunnan Chengfeng Non-ferrous Metals Co., Ltd. | CHINA | Not Determined |
| Tin | Yunnan Tin Group (Holding) Company Limited | CHINA | Conflict-Free |
| Tungsten | A.L.M.T. TUNGSTEN Corp. | JAPAN | Conflict-Free |
| Tungsten | ACL Metais Eireli | BRAZIL | Not Determined |
| Tungsten | Asia Tungsten Products Vietnam Ltd. | VIET NAM | Conflict-Free |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd. | CHINA | Conflict-Free |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd. | CHINA | Conflict-Free |
| Tungsten | Dayu Jincheng Tungsten Industry Co., Ltd. | CHINA | Not Determined |
| Tungsten | Dayu Weiliang Tungsten Co., Ltd. | CHINA | Not Determined |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd. | CHINA | Conflict-Free |
| Tungsten | Ganxian Shirui New Material Co., Ltd. | CHINA | Not Determined |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd. | CHINA | Conflict-Free |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd. | CHINA | Conflict-Free |
| Tungsten | Ganzhou Non-ferrous Metals Smelting Co., Ltd. | CHINA | Not Determined |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd. | CHINA | Conflict-Free |
| Tungsten | Ganzhou Yatai Tungsten Co., Ltd. | CHINA | Conflict-Free |
| Tungsten | Global Tungsten & Powders Corp. | UNITED STATES | Conflict-Free |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd. | CHINA | Conflict-Free |
| Tungsten | H.C. Starck GmbH | GERMANY | Conflict-Free |
| Tungsten | H.C. Starck Smelting GmbH & Co.KG | GERMANY | Conflict-Free |
| Tungsten | Hunan Chenzhou Mining Co., Ltd. | CHINA | Conflict-Free |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji | CHINA | Conflict-Free |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Yanglin | CHINA | Not Determined |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd. | CHINA | Conflict-Free |
| Tungsten | Hydrometallurg, JSC | RUSSIAN FEDERATION | Conflict-Free |
| Tungsten | Japan New Metals Co., Ltd. | JAPAN | Conflict-Free |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd. | CHINA | Not Determined |
| Tungsten | Jiangxi Dayu Longxintai Tungsten Co., Ltd. | CHINA | Not Determined |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd. | CHINA | Conflict-Free |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. | CHINA | Not Determined |
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | CHINA | Not Determined |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd. | CHINA | Not Determined |
| Tungsten | Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd. | CHINA | Conflict-Free |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd. | CHINA | Not Determined |
| Tungsten | Kennametal Fallon | UNITED STATES | Not Determined |
| Tungsten | Kennametal Huntsville | UNITED STATES | Conflict-Free |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd. | CHINA | Conflict-Free |
| Tungsten | Moliren Ltd | RUSSIAN FEDERATION | Not Determined |
| Tungsten | Niagara Refining LLC | UNITED STATES | Conflict-Free |

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|----------|--------------------------------------------------------------|--------------------|----------------|
| Tungsten | Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC | VIET NAM | Conflict-Free |
| Tungsten | Philippine Chuangin Industrial Co., Inc. | PHILIPPINES | Conflict-Free |
| Tungsten | Pobedit, JSC | RUSSIAN FEDERATION | Not Determined |
| Tungsten | Sanher Tungsten Vietnam Co., Ltd. | VIET NAM | Not Determined |
| Tungsten | South-East Nonferrous Metal Company Limited of Hengyang City | CHINA | Not Determined |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd. | VIET NAM | Conflict-Free |
| Tungsten | Vietnam Youngsun Tungsten Industry Co., Ltd. | VIET NAM | Conflict-Free |
| Tungsten | Wolfram Bergbau und Hütten AG | AUSTRIA | Conflict-Free |
| Tungsten | Woltech Korea Co., Ltd. | KOREA, REPUBLIC OF | Not Determined |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd. | CHINA | Conflict-Free |
| Tungsten | Xiamen Tungsten Co., Ltd. | CHINA | Conflict-Free |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd. | CHINA | Not Determined |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd. | CHINA | Conflict-Free |