

To whom it may concern,

Paris, May 13th 2024 RE: 2024-05-13-COUR 02/PR

**Subject: Conflict Minerals Policy Statement** 

ERASTEEL is delivering High-speed steel products, made by conventional or powder metallurgy.

Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act requires due diligence and disclosure requirements on companies that manufacture products containing certain minerals designated as "Conflict Minerals" – cassiterite, columbite, tantalite, gold, wolframite, and their derivatives tin, tantalum and tungsten – sourced from certain Central Africa countries – Democratic Republic of Congo or surrounding countries.

These requirements are based on concerns that revenues obtained from the commercialization of these minerals may finance the ongoing conflict in the Democratic Republic of Congo or adjoining countries.

Although this is a US law, it impacts our companies, regardless of where our suppliers might be located.

In accordance with the ERASTEEL Code of Ethics, ERASTEEL undertakes to prohibit the use of «conflict minerals» for all our products, and to get organized with suppliers to meet this requirement.

To ensure compliance with these requirements, our company requires that each supplier in its supply chain provide information regarding the conflict minerals that may be contained in the products purchased by our companies and so continue to source responsibly.

Moreover, having received the commitments from our cobalt and tungsten primary suppliers, we certify that the Tungsten (W) and the Cobalt (Co) used to manufacture our products do not come from the conflict area of the Democratic Republic of Congo or adjoining countries and that we don't use Tin (Sn), Tantalum (Ta) nor Gold (Au).

1

Select Language Preference Here: 這些性的時間 是不言語をこから選択してください。 表示言語をこから選択してください。	Conflict Minerals Reporting Template (CMRT)			
Select Language Preference, Here:	<u>English</u> Revision 6.4			
The purpose of this document is to collect sourcing information or				
Mandatory fields are noted with an asterisk (*).	Consult the instructions tab for guidance on how to answer each question.			
	Company Information			
Company Name (*):	Erasteel Kloster AB			
Declaration Scope or Class (*):				
Description of Scope:				
Company Unique ID:	556057-1811			
Company Unique ID Authority:	Bolagsverket-Tierp kommun, Uppsala län-Sweden			
Address: Contact Name (*):				
Email - Contact (*):	philippe.rocabois@erasteel.com			
Phone - Contact (*): Authorizer (*):				
Authorizer (*): Title - Authorizer:	·			
Email - Authorizer (*):				
Phone - Authorizer				
Effective Date (*):				
Answer the following question	ons 1 - 8 based on the declaration scope indicated above			
Intervention and parents	no 2 - O buolea di mie decimation occope indicated above			
1) Is any 3TG intentionally added or used in the product(s) or in the production process? (*)	Answer Comments			
Tantalum	no			
Tin	no			
Gold	no			
Tungsten (*)	yes			
2) Does any 3TG remain in the product(s)? (*)	Answer Comments			
Tantalum				
Tin				
Gold				
Tungsten (*)	Yes			
3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC				
term, see definitions tab) (*)	Answer Comments			
Tantalum Tin				
Gold				
Tungsten (*)	No			
4) Do any of the smelters in your supply chain source the 3TG from conflict-affected and high-risk				
areas? (*)	Answer Comments			
Tantalum				
Tin				
Gold				
Tungsten (*)	No			
5) Does 100 percent of the 3TG (necessary to the functionality or production of your products)				
originate from recycled or scrap sources? (*)	Answer Comments			
Tantalum				
Tin				
Gold				

(b) What percentage of relevant suppliers have provided a response to your supply chain survey?     (*)	Answer	Comments
Tantalum	Answer	
Tin		
Gold		
Tungsten (*)	100%	
· · · · · · · · · · · · · · · · · · ·		
7) Have you identified all of the smelters supplying the 3TG to your supply chain? (*)	Answer	Comments
Tantalum	Answer	Comments
Tin		
Gold		
Tungsten (*)	Yes	
· · · · · · · · · · · · · · · · · · ·		
<ol> <li>Has all applicable smelter information received by your company been reported in this declaration? (*)</li> </ol>	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	Yes	
	llowing Questions at a Company Level	
Question	Answer	Comments
A. Have you established a responsible minerals sourcing policy? (*)	Yes	Clearly specified in our general conditions of supply
B. Is your responsible minerals sourcing policy publicly available on your website? (Note – If yes, the user	Yes	https://www.erasteel.com/documents/
shall specify the URL in the comment field.) (*)		
C. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices	Yes	
C. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program? (*)	Yes	
	Yes	
have been validated by an independent third party audit program? (*)		Due diligence on our Supply Chain
	Yes	Due diligence on our Supply Chain
have been validated by an independent third party audit program? (*)		Due diligence on our Supply Chain
have been validated by an independent third party audit program? (*)		Due diligence on our Supply Chain
have been validated by an independent third party audit program? (*)  D. Have you implemented due diligence measures for responsible sourcing? (*)	Yes	Due diligence on our Supply Chain
have been validated by an independent third party audit program? (*)  D. Have you implemented due diligence measures for responsible sourcing? (*)  E. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)	Yes  Yes, in conformance with IPC1755 (e.g., CM	
have been validated by an independent third party audit program? (*)  D. Have you implemented due diligence measures for responsible sourcing? (*)	Yes	Due diligence on our Supply Chain  Included in standard contract conditions
have been validated by an independent third party audit program? (*)  D. Have you implemented due diligence measures for responsible sourcing? (*)  E. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)  F. Do you review due diligence information received from your suppliers against your company's	Yes  Yes, in conformance with IPC1755 (e.g., CM	
have been validated by an independent third party audit program? (*)  D. Have you implemented due diligence measures for responsible sourcing? (*)  E. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)  F. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Yes  Yes, in conformance with IPC1755 (e.g., CM	
have been validated by an independent third party audit program? (*)  D. Have you implemented due diligence measures for responsible sourcing? (*)  E. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)  F. Do you review due diligence information received from your suppliers against your company's	Yes, in conformance with IPC1755 (e.g., CM	
have been validated by an independent third party audit program? (*)  D. Have you implemented due diligence measures for responsible sourcing? (*)  E. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)  F. Do you review due diligence information received from your suppliers against your company's expectations? (*)  G. Does your review process include corrective action management? (*)	Yes  Yes, in conformance with IPC1755 (e.g., CM  Yes	
have been validated by an independent third party audit program? (*)  D. Have you implemented due diligence measures for responsible sourcing? (*)  E. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)  F. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Yes, in conformance with IPC1755 (e.g., CM	

Extended Mineral Reporting Template (EMRT)    Control						
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Meant to the control of the control			April 26, 202			
Company Name 10   Company Name	The purpose of this document is to collect sourcing in	formation on cobalt or	or natural mica.			
Company Name 10   Company Name	Mandatory fields are noted with an asterisk (*).	Consult the instruction	ons tab for guidance on how to answer each question.			
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Description of force  Group Company Disposed to Company Disposed t	Company Name (*):  Declaration Scope or Class (*):		asteel Kloster AB			
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Answer the following questions 1. "Placed on the declaration cope indicated above    Description   Comment   Comment		13.Mo	ov.2024			
Diversified and a continued make interactionally added or used in the production processed (**)						
Contenting processed (*)   Content	Answer the following question	is 1 - 7 based on the d	de claration scope indicated above			
Sociality   Ver   Sociality	I) Is any of the cobalt or natural mica intentionally added or used in the product(s) or in the production process? (*)	Answer	Comments			
2) Doe any cohall or natural min remain in the product(s)? (*)  Cohalt(*)  Soci  1) Do any of the marbers or processors to your supply chain source the oball or natural mins from conflict effected and high-risk enset? (OKED the Diligence biolistors, no ofministration tols)? (*)  Soci  1) Does 100 percent of the cobalk originate from recycled or sexup sources? (*)  Answer  Comments  Answer  Comments  (Obalt(*)  Soci  2) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)  Soci  (Obalt(*)  Soci  (Obalt(						
South   Sout	Mica	No				
South   Sout						
South   Sout	2) Does any cobalt or natural mice remain in the product(e)? (8)	Answer	Comments			
3) Do say of the numbers or processors in your empty chains source the collader estatival mixed from conflict-affected and high-risk areas (IOED) Due Diligence Guidance, see deflutions tably (*)  (Sobatt(*)  (S			Continents			
Comments  Answer  Comments    Description	Mica					
Comments  Answer  Comments    Description						
Comments  Answer  Comments    Description	3) Do any of the smelters or processors in your supply chain source the cobalt or natural mica from					
4) Does 100 percent of the cobalt originate from recycled or scrap source? (?)  Cobalt(?)  (**)	conflict-affected and high-risk areas? (OECD Due Diligence Guidance, see definitions tab) (*)		Comments			
4) Does 100 percent of the cobalt originate from recycled or acrap sources? (*)  Cobalt(*)  (*)  (*)  (*)  (*)  (*)  (*)  (*)		No				
5) What percentage of relevant suppliers have provided a response to your supply chain survey?(?)    Cobalt(?)   Nico	Pitta					
5) What percentage of relevant suppliers have provided a response to your supply chain survey?(?)    Cobalt(?)   Nico						
3) What percentage of relevant suppliers have provided a response to your supply chain survey?(*)    Cobality    New   Other   New   Comments			Comments			
Cobait()   100%   100	Cobalt(*)	No				
Cobait()   100%   100						
(a) Have you identified all of the smelters or processors supplying the cobalt or natural mica to your supply chain. (**)  (b) Have you identified all of the smelters or processor supplying the cobalt or natural mica to your supply chain. (**)  (c) Answer  (Comments	5) What percentage of relevant suppliers have provided a response to your supply chain survey?(*)					
6) Have you identified all of the smelters or processor's supplying the cobalt or natural mica to your supply chain?")  Cobalt(?)  No  7) Bas all applicable smelter or processor information received by your company been reported in this declaration?"  Cobalt(?)  No  Answer  Comments  Comments  Answer  Comments  Answer  Comments  Answer  Comments  Comments  Answer  Comments  Comments  Comments  Answer  Comments  Comments  Comments  Answer  Comments  Comments  Comments  Fee   Answer  Comments  Fee   Fee   Fee   Comments  Fee   Fee   Comments  Fee   Fee   Comments  Fee   Fee   Fee   Comments  Fee   Fee   Fee   Comments  Fee   Fee   Fee   Comments  Fee   F	Cobalt(*)		Comments			
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Cobalt(*)   Nice   Comments   Cobalt(*)   Nice   Comments   Comm	6) Have you identified all of the smelters or processors supplying the cobalt or natural mica to your supply chain?(*)					
7) Has all applicable smelter or processor information received by your company been reported in this declaration?   Cobalt?	2010 111100		Comments			
Answer  Cobalt(1)  Nice  Answer the Following Questions at a Company Level  Question  A lawy ou established a responsible minerals sourcing policy(?)  B. Is your responsible minerals sourcing policy questions on a company Level  B. Is your responsible minerals sourcing policy publicly available on your website? (Note – if yes, the user shall sped) the URL in the comment field.) (?)  C. Do your equire your direct suppliers to source cobalt from smelters or natural mica from processors whose due diligence practices have been validated by an independent third-party audit program?(?)  D. Haw you implemented due diligence measures for responsible sourcing?(?)  E. Does your company conduct cobalt and/or natural mica supply chain survey(s) of your relevant supplier(s)?(?)  F. Do your veview due diligence information received from your suppliers against your company's expectations?(?)  F. Do your veview due diligence information received from your suppliers against your company's expectations?(?)  Ves						
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Answer the Following Questions at a Company Level  Question Answer  Answer  Answer  Answer  Answer  Answer  Answer  Answer  Answer  Tes  315 care.  B. Is your responsible minerals sourcing policy (")  C. Do you require your direct suppliers to source cobalt from smelters or natural mica from processors whose due diligence practices have been validated by an independent third-party audit program?")  D. Have you implemented due diligence measures for responsible sourcing?")  E. Does your company conduct cobalt and/or natural mica supply chain survey(s) of your relevant supplier (s)(?)  F. Do your review due diligence information received from your suppliers against your company's supplier (s)(?)  F. Do your review due diligence information received from your suppliers against your company's supplier (s)?(?)  F. Do your review due diligence information received from your suppliers against your company's supplier (s)?(?)  F. Do your review due diligence information received from your suppliers against your company's supplier (s)?(?)			Comments			
A have comments  A have possible minerals sourcing policy (?)  B. Is your responsible minerals sourcing policy publicly available on your website? (Note – If yes, the user shall specify the URL in the comment field; (?)  C. Do you require your direct suppliers to source cobalt from a melters or natural mica from processors whose the dill gence practices have been validated by an independent third-party audit program? (*)  Mico  D. Have you implemented due diligence measures for responsible sourcing?(*)  E. Does your company conduct cobalt and/or natural mica supply chain survey(s) of your relevant supplier(s)?(*)  F. Do you review due diligence information received from your suppliers against your company's expectations? (*)  F. Do you review due diligence information received from your suppliers against your company's expectations? (*)						
A have comments  A have possible minerals sourcing policy (?)  B. Is your responsible minerals sourcing policy publicly available on your website? (Note – If yes, the user shall specify the URL in the comment field; (?)  C. Do you require your direct suppliers to source cobalt from a melters or natural mica from processors whose the dill gence practices have been validated by an independent third-party audit program? (*)  Mico  D. Have you implemented due diligence measures for responsible sourcing?(*)  E. Does your company conduct cobalt and/or natural mica supply chain survey(s) of your relevant supplier(s)?(*)  F. Do you review due diligence information received from your suppliers against your company's expectations? (*)  F. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Answer the Fo	llowing Questions at	at a Company Level			
B. Is your responsible minerals sourcing policy publicly available on your website? (Note - if yes, the user shall specify the URL in the comment field, (**)  C. Do you require your direct suppliers to source cobalt from smelters or natural mica from processors whose the difference practices have been validated by an independent third-party audit program it?)  No  Mica  D. Have you implemented due diligence measures for responsible sourcing?(**)  E. Does your company conduct cobalt and/or natural mica supply chain survey(s) of your relevant supplier(s)?(**)  E. Does your company conduct cobalt and/or natural mica supply chain survey(s) of your relevant supplier(s)?(**)  F. Do you review due diligence information received from your suppliers against your company's expectations?(**)  Yes    STG.TER.     STG.TER.	Question	Answer	Comments			
E. Dos you require your direct suppliers to source cobalt from smeltest or natural mica from processors whose due diligence measures for responsible sourcing?(')   Ves	A. Have you established a responsible minerals sourcing policy?(*)	res	3TG area.			
whose due diligence practices have been validated by an independent third-party audit program?(')  Cobalt(')  Mico  D. Have you implemented due diligence measures for responsible sourcing?(')  E. Does your company conduct cobalt and/or natural mica supply chain survey(s) of your relevant supplier (s)?(')  F. Do you review due diligence information received from your suppliers against your company's expectations? (')  Yes  P. So you review due diligence information received from your suppliers against your company's expectations? (')	B. Is your responsible minerals sourcing policy publicly available on your website? (Note – If yes, the user shall specify the URL in the comment field.) (*)	Yes	https://www.erasteel.com/vep-content/uploads/2023/02/20230104_ES- 2023_01_CMRTEMET_Compliance-Letter_KL_EN-1.pdfIt will be updated before. 15 June 2024			
Mica	C. Do you require your direct suppliers to source cobalt from smelters or natural mice from processors whose due diligence practices have been validated by an independent third-party audit program?(*)					
D. Have you implemented due diligence measures for responsible sourcing?(*)  E. Does your company conduct cobalt and/or natural mica supply chain survey(s) of your relevant supplier(s)?(*)  F. Do your eview due diligence information received from your suppliers against your company's expectations? (*)  Yes  Yes  Yes		No				
E. Does your company conduct cobalt and/or natural mica supply chain survey(s) of your relevant supplier(s)?(')  F. Do your review due diligence information received from your suppliers against your company's expectations? (')  Yes, in conformance with IPC1755 (e.g. EMRT)  Yes						
EMRT)  F. Do you review due diligence information received from your suppliers against your company's expectations? (*)  Yes	D. Have you implemented due diligence measures for responsible sourcing?(*)	Yes				
EMRT)  F. Do you review due diligence information received from your suppliers against your company's expectations? (*)  Yes						
expectations? (*)		Yes, in conformance EMRT)	e with IPC1755 (e.g.			
expectations? (*)						
	F. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Yes				
G. Does your review process include corrective action management? (*)						
	G. Does your review process include corrective action management? (*)	No				

To ensure all required fields have be Click here to return to Declaration tab	een populated before submitting to your customers re- Answer provided	iew form for any line items highlighted in red	Required fields remaining to be completed 0
Required Fields  Dimpany Name (*):	Answer provided  Brasteel Kloster AB	Complete	Hyperlink to source
eclaration Scope or Class (*):	A Company	Complete	
respire of Empo		Complete	
intact Name (*):	ROCABOLS Philippe	Complete	
mail - Contact (*):	philippe.rocabois@erasteel.com	Complete	
none – Contact ( *):	+33788302734	Complete	
uthorizer (*):	ROCABOLS Philippe	Complete	
mail - Authorizer (*):	philippe.rocabois©erasteel.com	Camplete	
Fective Date (*):	13-May-2024	Complete	
intalum	no	Complete	
	no	Complete	
old	no	Complete	
ingsten (*)	yes	Complete	
Does any 370 remain in the product(s)? (*)			
intalum		Complete	
		Complete	
ild		Complete	
ingsten (*)	Ves	Complete	
Do any of the smalters in your supply chain source			
Do any of the smelters in your supply chain source se 313 from the covered countries? (SEC term, see finitions tab) (*)			
antalum		Complete	
		Complete	
ald		Complete	
ingsten (*)	No	Complete	
Do any of the smelters in your supply chain source in 333 from conflict-affected and high-risk areas? (*)			
e 33G from conflict-affected and high-risk areas? (*)			
		Complete	
in .		Complete	
ald		Complete	
ingsten (*)	No	Complete	
Does 100 percent of the 310 (necessary to the inctionality or production of your products) originate on recycled or scrap sources? (*)			
om recycled or scrap sources? ( **)		Complete	
		Complete	
eld			
		Complete	
ingsten (*)	No	Complete	
) What percentage of relevant suppliers have provided response to your supply chain survey? (*)			
intalum in		Complete Complete	
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ungsten (*)	100%	Complete	
) Have you identified all of the smelters supplying the IG to your supply chain? (*)			
not alum			
ot Library		Complete	
n.		Complete	
%		- 72	
eld		Complete	
ungsten (*)	Ves	Complete	
tional archesis make information and			
Has all applicable smelter information received by our company been reported in this declaration? (*)			
intalum		Complete	
		Complete	
sld		Complete	
	Yes	Camplete	
ongsten (*)	-		
Have you established a responsible minerals surding policy? (*)	Yes	Complete	
Is your responsible minerals sourcing policy publicly valiable on your website? (Note – If yes, the user shall seekly the URL in the comment field.) ( $^{n}$ )	Yes	Complete	
e URL in the comment field	https://www.erasteel.com/documents/	Complete	
Do you require your direct suppliers to source the G from smalters whose due diligence practices have sen validated by an independent third party audit optam? (*)	Yes	Complete	
en vandated by an independent third party audit orgam?(*). Have you implemented due diligence measures for sponsible sourcing?(*)			
sponsible sourcing? (*)	Yes	Complete	
Does your company conduct Conflict Minerals invey(s) of your relevant supplier(s)?(*)  Do you review due diligence information received	Ves. in conformance with IPC1735 (e.g., CMRT)	Complete	
Do you review due diligence information received om your suppliers against your company's operations? (*)	Yes	Complete	
Does your review process include corrective action an agement? (*)	No	Complete	
Is your company required to file an annual conflict inerals disclosure? (*)	No	Complete	
	No products or item numbers listed	Complete	
			+
reduct List		Complete	
odect Ust melter List - Tantalum		Complete	
odoct List - nollor List - Tantalan nollor List - Tia		Complete	
reduct List			

#### TO BEGIN:

Option A: If you know the Smelter I dentification Number, input the number in Column A (columns B, C, E, F, G, I and J will auto-populate); D will grey out.

Option B: If you have a Metal and Smelter Look-up name combination, complete the following steps:

Step 1. Select Metal in column E

Step 2. Select from dropdown in column C (wrong combination will trigger RED color)

Option C: If you have a Metal and Smelter Name combination, complete the following steps:

Step 1. Select Metal in column B

Step 2: Select "Smelter Not Listed" in the Smelter Look-up drop down and complete columns D & E

Step 3. Enter all available smelter information in columns H through Q

(\*) Mandatory fields are noted with an asterisk.

(1) Entry required when Smelter Look-up = "Smelter not listed"

NOTE: A combination of Options A, B and C may be used to complete the Smelter List. Do not alter autopopulated cells. All errors in the Smelter Look-up should be reported to RMI by



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Smelter Identification Number Input	Metal (*)	Smelter Look-up (*)	Smelter Name (1)	Smelter Country (*)	Smelter Identification	Source of Smelter Identification	Smelter Street	Smelter City
Column <u>*</u>			<u> </u>	•		Number <u>*</u>		
	Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.		CHINA	CID002315	RMI		Ganzhou
	Tungsten	Asia Tungsten Products Vietnam Ltd.		VIET NAM	CID002502	RMI		Vinh Bao District
	Tungsten	Shinwon Tungsten (Fujian Shanghang) Co., Ltd.		CHINA	CID004430	RMI		Longyan

#### TO BEGIN:

Option A: If you know the Smelter Identification Number, input the number in Column A (columns B, C, E, F, G, I and J will auto-populate); D will grey out.

Option B: If you have a cobalt or natural mica and Smelter Look-up name combination, complete the following steps:

Step 1. Select Metal in column B

Step 2. Select from dropdown in column C

Option C: If you have a cobalt or natural mica and Smelter Name combination, complete the following steps:

Step 1. Select Metal in column B

Step 2: Select "Smelter Not Listed" in the Smelter Look-up drop down and complete columns D & E

Step 3. Enter all available smelter information in columns H through  ${\bf Q}$ 

(\*) Mandatory fields are noted with an asterisk.

(1) Entry required when Smelter Look-up = "Smelter Not Listed"

NOTE: A combination of Options A, B and C may be used to complete the Smelter List. Do not alter autopopulated cells. All errors in the Smelter Look-up should be reported to RBA by contacting RMI@ResponsibleBusiness.org.



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						(C)	2024 Responsible Minerals Initiative.	All rights reserved.
Smelter Identification Number Input Column		Smelter Look-up (*)	Smelter Name (1)	Smelter Country (*)	Smelter Identification	Source of Smelter Identification Number	Smelter Street	Smelter City
	Cobalt	Freeport Kokkola		FINLAND	CID003226	RMI		Kokkola
	Cobalt	Sumitomo Metal Mining		JAPAN	CID003278	RMI		Niihama
	Cobalt	Port Colborne Refinery		CANADA	CID003239	RMI		Port Colborne
	Cobalt	Dynatec Madagascar Company		MADAGASCAR	CID003232	RMI		Toamasina
	Cobalt	Murrin Murrin Nickel Cobalt Plant		AUSTRALIA	CID003406	RMI		Laverton
	Cobalt	NORILSK NICKEL HARJAVALTA OY		FINLAND	CID003390	RMI		Harvjavalta