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

FORM SD

Specialized Disclosure Report

CLEAN ENERGY FUELS CORP.
(Exact Name of Registrant as Specified in Charter)

Delaware	**001-33480**	**33-0968580**
(State or Other Jurisdiction of Incorporation or Organization)	**(Commission File Number)**	**(IRS Employer Identification No.)**

4675 MacArthur Court, Suite 800
Newport Beach, California **92660**
(Address of Principal Executive Offices) **(Zip Code)**

J. Nathan Jensen
Senior Vice President, Corporate Transactions and Chief Legal Officer
Clean Energy Fuels Corp.
4675 MacArthur Court, Suite 800
Newport Beach, California 92660
(949) 437-1000
(Name and Telephone Number, including Area Code, of the Person to Contact in Connection with This Report.)

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

☒ Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2018.

Section 1 — Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report.

Conflict Minerals Disclosure

This Form SD of Clean Energy Fuels Corp. (the "Company") is filed pursuant to Rule 13p-1 promulgated under the Securities Exchange Act of 1934 for the reporting period from January 1, 2018 to December 31, 2018 (the "Reporting Period").

A copy of the Company's Conflict Minerals Report for the Reporting Period is filed as Exhibit 1.01 to this Form SD, is hereby incorporated by reference herein, and is publicly available at http://investors.cleanenergyfuels.com/corporate-governance.cfm. The foregoing website reference is intended to be an inactive textual reference, and the contents of the Company's website are not incorporated into this Form SD.

Item 1.02 Exhibit.

The Conflict Minerals Report required by Item 1.01 of Form SD is filed as Exhibit 1.01 to this Form SD.

Section 2 — Exhibits

Item 2.01 Exhibits

Exhibit No.	Description
1.01	Conflict Minerals Report for the reporting period January 1, 2018 to December 31, 2018 as required by Items 1.01 and 1.02 of this Form.

EXHIBIT INDEX

Exhibit No.	Description
1.01	Conflict Minerals Report for the reporting period January 1, 2018 to December 31, 2018 as required by Items 1.01 and 1.02 of this Form.

SIGNATURES

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

Clean Energy Fuels Corp.

By: /s/ Andrew J. Littlefair Date: May 30, 2019
Name: Andrew J. Littlefair
Title: President and Chief Executive Officer

Exhibit 1.01

CLEAN ENERGY FUELS CORP.
Conflict Minerals Report
For the Reporting Period from January 1, 2018 to December 31, 2018

This Conflict Minerals Report (the "Report") of Clean Energy Fuels Corp. (together with its consolidated subsidiaries, the "Company") has been prepared pursuant to Rule 13p-1 and Form SD (collectively, the "Rule") promulgated under the Securities Exchange Act of 1934, as amended, for the reporting period from January 1, 2018 to December 31, 2018 (the "Reporting Period"). As permitted by applicable guidance of the Securities and Exchange Commission, the Company did not obtain an independent private sector audit within the meaning of the Rule.

Overview of the Company and the Rule

The Company is the leading provider of natural gas as an alternative fuel for vehicle fleets in the United States and Canada, based on the number of stations operated and the amount of gasoline gallon equivalents ("GGEs") of renewable natural gas ("RNG"), compressed natural gas ("CNG") and liquefied natural gas ("LNG") delivered. The Company's principal business is supplying RNG, CNG and LNG (RNG can be delivered in the form of CNG or LNG) for light, medium and heavy-duty vehicles and providing operation and maintenance ("O&M") services for vehicle fleet customer stations. As a comprehensive solution provider, the Company also designs, builds, operates and maintains fueling stations; sells and services natural gas fueling compressors and other equipment used in CNG stations and LNG stations; offers assessment, design and modification solutions to provide operators with code-compliant service and maintenance facilities for natural gas vehicle fleets; transports and sells CNG and LNG via "virtual" natural gas pipelines and interconnects; procures and sells RNG; sells tradable credits it generates by selling RNG and conventional natural gas as a vehicle fuel, including Renewable Identification Numbers under the federal Renewable Fuel Standard Phase 2 and credits under the California and Oregon Low Carbon Fuel Standards; helps its customers acquire and finance natural gas vehicles; and obtains federal, state and local tax credits, grants and incentives. As of March 31, 2019, the Company served over 1,000 fleet customers operating over 47,000 natural gas vehicles, and the Company owned, operated or supplied approximately 530 natural gas fueling stations in 41 states in the United States and four provinces in Canada.

The Rule requires disclosure of certain information if a company manufactures or contracts to manufacture products for which the minerals specified in the Rule are necessary to the functionality or production of the products. The Rule also requires such companies to conduct certain inquiries reasonably designed to determine whether such minerals originated in the countries specified in the Rule. The minerals specified in the Rule, which are collectively referred to in this Report as the "Conflict Minerals," consist of gold, columbite-tantalite (coltan), cassiterite and wolframite, including their derivatives, which are limited to tantalum, tin and tungsten. The countries specified in the Rule, which are collectively referred to in this Report as the "Covered Countries," consist of the Democratic Republic of the Congo and all countries that share an international border with the Democratic Republic of the Congo, which presently consists of the Republic of the Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola. As described in this Report, certain aspects of the Company's operations involve the manufacture, or contracting for manufacture, of products for which the Conflict Minerals are necessary to the functionality or production of the products.

When this Report uses the term "Conformant," it means the applicable mine, smelter or refiner has been verified as complying with the Responsible Minerals Assurance Process ("RMAP," formerly the Conflict-Free Smelter Program or CFSP) of the Responsible Mining Initiative ("RMI," formerly the Conflict-Free Sourcing Initiative or CFSI) or an equivalent third-party audit program, and when this Report uses the term "Active," it means the applicable mine, smelter or refiner has agreed to participate in the RMAP but has not yet completed the program to become Conformant.

The Company's Products Covered by this Report

This Report covers products: (i) for which one or more Conflict Minerals is necessary to the functionality or production of the product; (ii) that were manufactured, or contracted to be manufactured, by the Company; and (iii) for which the manufacture was completed during the Reporting Period. These products, which are collectively referred to in this Report as the "Covered Products," consist of the following:

- **LNG Pumps** – This product category includes products that offload LNG from cryogenic tanker trailers into storage tanks at LNG fueling stations and deliver LNG to dispensers from storage tanks, as well as replacement parts for such products.
- **LNG Dispensers** – This product category includes products that dispense LNG into vehicles, as well as replacement parts for such products.

- **Fueling Station Support Panels** – This product category includes electrical storage panels used in natural gas fueling stations, as well as replacement parts for such products. A fueling station support panel houses the point of sale system that tracks dispenser transactions, the communications system, purge fans, a digital video recorder and camera to record activities at the station and power circuits for station lighting and electrical control.

Third-party products the Company sells at retail but does not manufacture or contract to manufacture are outside the scope of this Report.

Overview of the Company's Supply Chain

The Company's supply chain with respect to the Covered Products is complex, and there are many third parties in the supply chain between the original sources of Conflict Minerals and the ultimate manufacture of the Covered Products. In this regard, the Company does not purchase Conflict Minerals directly from mines, smelters or refiners. The Company must therefore rely on its suppliers to provide information regarding the origin of Conflict Minerals that are necessary to the functionality or production of the Covered Products. Moreover, the Company believes the mines, smelters and refiners of the Conflict Minerals are best situated to identify the sources of Conflict Minerals, and therefore the Company has sought to identify the applicable mines, smelters and refiners of Conflict Minerals in the Company's supply chain.

The Company's Conflict Minerals Policy

The Company maintains a policy relating to the sourcing of Conflict Minerals (the "Company Policy"), which provides as follows:

- The Company is guided by its core beliefs and values as stated in the Company's Code of Ethics. The Company is committed to ethical practices and compliance with applicable laws and regulations wherever it does business. The Company believes that its commitment to integrity and citizenship extends to its worldwide supply base. The Company is committed to sourcing its products responsibly, and it expects its suppliers to also source materials from responsible suppliers.
- The Company expects its suppliers to partner with it to comply with the Rule. The Company expects its suppliers to:
    - Complete the Company's Conflict Minerals survey, identifying whether any Conflict Mineral is present in the material that they sell to the Company and the smelter, refiner or mine that originally provided it (for this purpose, the Company's direct suppliers may have to require successive upstream suppliers to complete the Company's Conflict Minerals survey until the applicable smelter, refiner or mine is identified);
    - Agree to cooperate fully with the Company in connection with any due diligence that the Company chooses to perform with respect to its inquiries; and
    - When the Company deems it necessary, to provide reasonable proof of the due diligence performed by the supplier to support the information provided by the supplier to the Company.
- The Company evaluates its relationships with its suppliers on an ongoing basis, and reserves the right to consider the extent to which a supplier has failed to reasonably comply with the Company Policy in the course of such evaluation.

The Company has designed its Conflict Minerals reporting efforts, including the design and implementation of the Company Policy, to align and comply with the Rule. The full text of the Company Policy is available at http://investors.cleanenergyfuels.com/corporate-governance.cfm. The foregoing website reference and all other such references in this Report are intended to be inactive textual references, and the contents of the Company's website are not intended to be incorporated into this Report.

The Company's Reasonable Country of Origin Inquiry

The Company has conducted in good faith a reasonable country of origin inquiry ("RCOI") regarding the Conflict Minerals. This RCOI was reasonably designed to determine whether any of the Conflict Minerals necessary to the functionality or production of a Covered Product originated in the Covered Countries or may be from recycled or scrap sources. Based on the RCOI, the Company has reason to believe that some of the necessary Conflict Minerals contained in the Covered Products may have originated from the Covered Countries or may not be from recycled or scrap sources. As a result, the Company exercised due diligence on the source and chain of custody of such Conflict Minerals, as described below.

Due Diligence Process

Due diligence process design

The Company's due diligence measures have been designed to conform, in all material respects, to the framework in the *Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas: Third Edition (2016)*, including the related supplements on gold, tin, tantalum and tungsten (collectively, the "OECD Guidance").

Due diligence performed

Below is a summary of the Company's due diligence process performed in the Reporting Period regarding the sourcing of the necessary Conflict Minerals contained in the Covered Products. The description below is intended to provide a summary of the Company's due diligence process, and thus the measures described below are not the only measures the Company took in the Reporting Period in furtherance of the Company Policy or pursuant to the Rule and the OECD Guidance.

OECD Guidance Step 1: Maintain a management system

- The Company continued to make the Company Policy publicly available.
- The Company maintained a working group that oversaw its due diligence process (the "Working Group"). The Working Group was led by the Company's Senior Vice President, Corporate Transactions and Chief Legal Officer, and also included the Company's Director, Supply Chain; the Supply Chain Manager of the Company's subsidiary Clean Energy Cryogenics; and the Company's Director, Legal Affairs. The Company also engaged an external service provider to support the due diligence process.
- The Company continued to use RMI's Conflict Minerals Reporting Template (the "Template") as a means for collecting information related to the use and origin of Conflict Minerals (including smelter data) in the Company's supply chain.

OECD Guidance Step 2: Identify and assess risks

- The Company contacted its 18 identified in-scope suppliers and provided them with a summary of the Rule, links to the Template and the Company Policy, and contact information for the Company.
- To aid in the identification and assessment of potentially adverse impacts, the Company defined several "Red Flags," or indicators that one or more items in a supplier's completed Template or other response to the Company's due diligence inquiries are worthy of further action by the Company. The Red Flags were designed to ensure that the Template has been completed in full, and also to capture (i) the reasonableness of responses using logic checks; (ii) whether a supplier has initiated its own due diligence on minerals sourcing; (iii) whether any Conflict Minerals are sourced from one of the Covered Countries, and (iv) whether the mines, smelters or refiners identified by suppliers are Conformant or Active.
- Suppliers that did not submit the Template by the requested deadline or presented Red Flags were contacted by members of the Working Group.

OECD Guidance Step 3: Design and implement strategy to respond to risk

- The Working Group reported the findings of the due diligence process to the Company's senior management and Board of Directors.
- The Company maintained a risk management plan that establishes supplier risk management strategies, and followed up with suppliers as needed in accordance with this plan.

OECD Guidance Step 4: Carry out independent third-party audits of the supply chain

- The Company relied on the RMI and that organization's RMAP for independent third-party audits of the mines, smelters and refiners in its supply chain.
- As noted above, and in accordance with applicable guidance, the Company did not obtain an independent private sector audit within the meaning of the Rule.

OECD Guidance Step 5: Report on supply chain due diligence

- The Company is reporting the results of the due diligence it performed by providing this Report as Exhibit 1.01 to a Form SD filed with the Securities and Exchange Commission. The Company also has made this Report publicly available on its website.

Results of Due Diligence Performed

The Company's efforts to determine the mine or location of origin of the necessary Conflict Minerals contained in the Covered Products with the greatest possible specificity consisted primarily of the due diligence measures described in this Report. The Company received responses from 72% of its identified in-scope suppliers.

Based on the information provided by the Company's suppliers, and taking into account the supplier responses described in the preceding paragraph, the Company believes the facilities that may have been used to process the necessary Conflict Minerals contained in the

Covered Products include the processing facilities listed in Tables 1, 2 and 3 in Appendix A to this Report. Of the 300 processing facilities identified by the Company's suppliers as being in the supply chain for the Covered Products, 249 have been validated as Conformant, four have been confirmed as Active, and 47 have not been confirmed as Conformant or Active.

Based on its due diligence efforts, the Company does not have sufficient information to conclusively determine the countries of origin of the Conflict Minerals in the Covered Products. Based on the information provided by the Company's suppliers, however, the Company has reason to believe that some of the necessary Conflict Minerals contained in the Covered Products may have originated from the Covered Countries or may not be from recycled or scrap sources.

Additional Future Measures

The Company aims to take the following steps, among others, to improve its due diligence measures and to further mitigate the risk that the necessary Conflict Minerals contained in the Covered Products finance or benefit armed groups (perpetrators of serious human rights abuses) in the Covered Countries:

- Continue to enhance its employee training relating to the Rule, the Company Policy and the Company's procedures to identify and work with in-scope suppliers.
- Continue to engage with suppliers to help them better understand the Rule and the Company Policy and to obtain accurate and complete information about the origin of Conflict Minerals in the Company's supply chain, including improving the quality of the processing facility data provided by suppliers.
- Seek opportunities to assist suppliers in building capabilities with a view to improving due diligence performance.
- Continue its initiative to include language in its new supply contracts that requires suppliers to comply with the Company Policy.
- Continue to engage in industry initiatives that encourage Conformant supply chains.

Inherent Limitations on Due Diligence Measures

As a downstream purchaser of products that contain Conflict Minerals, the Company's due diligence measures can provide only reasonable, not absolute, assurance regarding the source and chain of custody of the necessary Conflict Minerals contained in the Covered Products. The supply chain of commodities such as the Conflict Minerals is a complex and multi-step process that involves a number of different parties. Because the Company does not have direct contractual relationships with mines, smelters and refiners, its due diligence processes must rely on information provided by its direct suppliers, as well as similar information provided to those suppliers within their supply chains, to identify the original sources of the necessary Conflict Minerals contained in the Covered Products. The results of the Company's due diligence efforts could contain inaccuracies or incomplete information due to this process of collecting information. Further, many suppliers' responses represent the supply chain at a company-level rather than being product-specific, and as a result, the list of processing facilities disclosed in this Report may contain facilities that did not actually process the Conflict Minerals contained in the Covered Products. In addition, the Company relies on information collected and provided by independent third-party audit programs, such as the RMAP of the RMI, and these sources of information may yield unreliable, inaccurate or incomplete information due to a variety of factors, including human or other errors or fraudulent actions.

Forward-Looking Statements

This Report contains forward-looking statements regarding the Company's business, products and Conflict Minerals efforts, including steps the Company intends to take to improve its due diligence measures. Words such as "expects," "believes," "aims" and similar expressions or variations of such words are intended to identify forward-looking statements, but are not the exclusive means of identifying forward-looking statements in this Report. All statements made in this Report concerning future matters that are not historical in nature are forward-looking statements. Although forward-looking statements in this Report reflect the Company's good faith judgment, such statements can only be based on facts and assumptions currently known by the Company. Consequently, forward-looking statements are inherently subject to risks and uncertainties, and actual results and outcomes may differ materially from the results and outcomes discussed in or anticipated or implied by the forward-looking statements. Factors that could cause or contribute to such differences in results and outcomes include, among others: the risk that information reported to the Company by its suppliers, or other industry information used by the Company, may be inaccurate; the risk that mines, smelters or refiners may not participate in the RMAP or equivalent third-party audit programs, which are voluntary initiatives; and risks related to the Company's compliance with government regulations and policies, which, among other risks, are discussed under "Risk Factors" in the Company's most recent annual report on Form 10-K and the other filings it makes with the U.S. Securities and Exchange Commission from time to time, including any subsequently filed quarterly and current reports. Forward-looking statements are not predictions of future events, and readers should not rely on them as such. All forward-looking statements included in this Report speak only as of the date of this Report, and the Company undertakes no obligation to revise or update any forward-looking statements in order to reflect any event or circumstance that may arise after the date of this Report.

Appendix A

Tables of Our Conflict Minerals Processing Facilities

Table 1. Conformant processing facilities as of March 7, 2019.

The following processing facilities that were reported as being in the Company's supply chain have been validated as Conformant:

Metal	Processing Facility Name	Processing Facility Location
Gold	Advanced Chemical Company	Rhode Island
Gold	Aida Chemical Industries Co., Ltd.	Tokyo
Gold	Allgemeine Gold-und Silberscheideanstalt A.G.	Baden-Württemberg
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	Toshkent
Gold	AngloGold Ashanti Corrego do Sitio Mineracao	Minas Gerais
Gold	Argor-Heraeus S.A.	Ticino
Gold	Asahi Pretec Corp.	Hyogo
Gold	Asaka Riken Co., Ltd.	Fukushima
Gold	Aurubis AG	Hamburg
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	Rizal
Gold	Boliden AB	Västerbottens län [SE-24]
Gold	C. Hafner GmbH + Co. KG	Baden-Württemberg
Gold	CCR Refinery—Glencore Canada Corporation	Quebec
Gold	Cendres + Metaux S.A.	Bern
Gold	Chimet S.p.A.	Toscana
Gold	Daejin Indus Co., Ltd.	Incheon-gwangyeoksi
Gold	DSC (Do Sung Corporation)	Gyeonggi-do
Gold	DODUCO Contacts and Refining GmbH	Baden-Württemberg
Gold	Dowa	Akita
Gold	Eco-System Recycling Co., Ltd.	Saitama

Metal	Processing Facility Name	Processing Facility Location
Gold	OJSC Novosibirsk Refinery	Novosibirskaya oblast’
Gold	HeeSung Metal Ltd.	Incheon-gwangyeoksi
Gold	Heimerle + Meule GmbH	Baden-Württemberg
Gold	Heraeus Metals Hong Kong Ltd.	Hong Kong
Gold	Heraeus Precious Metals GmbH & Co. KG	Hessen
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	Nei Mongol
Gold	Ishifuku Metal Industry Co., Ltd.	Saitama
Gold	Istanbul Gold Refinery	İstanbul
Gold	Japan Mint	Osaka
Gold	Jiangxi Copper Co., Ltd.	Jiangxi
Gold	Asahi Refining USA Inc.	Utah
Gold	Asahi Refining Canada Ltd.	Ontario
Gold	JSC Uralelectromed	Sverdlovskaya oblast’
Gold	JX Nippon Mining & Metals Co., Ltd.	Ôita
Gold	Kazzinc	Qaraghandy oblysy
Gold	Kennecott Utah Copper LLC	Utah
Gold	Kojima Chemicals Co., Ltd.	Saitama
Gold	Kyrgyzaltyn JSC	Chüy
Gold	LS-NIKKO Copper Inc.	Ulsan-gwangyeoksi
Gold	Materion	New York
Gold	Matsuda Sangyo Co., Ltd.	Saitama
Gold	Metalor Technologies (Suzhou) Ltd.	Jiangsu
Gold	Metalor Technologies (Hong Kong) Ltd.	Hong Kong
Gold	Metalor Technologies (Singapore) Pte., Ltd.	South West
Gold	Metalor Technologies S.A.	Neuchâtel
Gold	Metalor USA Refining Corporation	Massachusetts

Metal	Processing Facility Name	Processing Facility Location
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	Coahuila de Zaragoza
Gold	Mitsubishi Materials Corporation	Kagawa
Gold	Mitsui Mining and Smelting Co., Ltd.	Hiroshima
Gold	Moscow Special Alloys Processing Plant	Moskva
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	İstanbul
Gold	Nihon Material Co., Ltd.	Chiba
Gold	Ohura Precious Metal Industry Co., Ltd.	Nara
Gold	OJSC “The Gulidov Krasnoyarsk Non-Ferrous Metals Plant” (OJSC Krastsvetmet)	Krasnoyarskiy kray
Gold	PAMP S.A.	Ticino
Gold	Prioksky Plant of Non-Ferrous Metals	Ryazanskaya oblast’
Gold	PT Aneka Tambang (Persero) Tbk	Jakarta Raya
Gold	PX Precinox S.A.	Neuchâtel
Gold	Rand Refinery (Pty) Ltd.	Gauteng
Gold	Royal Canadian Mint	Ontario
Gold	Samduck Precious Metals	Incheon-gwangyeoksi
Gold	SEMPSA Joyeria Plateria S.A.	Madrid, Comunidad de
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	Shandong
Gold	Sichuan Tianze Precious Metals Co., Ltd.	Sichuan
Gold	SOE Shyolkovsky Factory of Secondary Precious Metals	Moskovskaja oblast’
Gold	Solar Applied Materials Technology Corp.	Tainan
Gold	Sumitomo Metal Mining Co., Ltd.	Ehime
Gold	Tanaka Kikinzoku Kogyo K.K.	Kanagawa
Gold	The Refinery of Shandong Gold Mining Co., Ltd.	Shandong
Gold	Tokuriki Honten Co., Ltd.	Saitama
Gold	Torecom	Chungcheongnam-do

Metal	Processing Facility Name	Processing Facility Location
Gold	Umicore Brasil Ltda.	São Paulo
Gold	Umicore S.A. Business Unit Precious Metals Refining	Antwerpen
Gold	United Precious Metal Refining, Inc.	New York
Gold	Valcambi S.A.	Ticino
Gold	Western Australian Mint (T/a The Perth Mint)	Western Australia
Gold	Yamakin Co., Ltd.	Kochi
Gold	Yokohama Metal Co., Ltd.	Kanagawa
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	Henan
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	Fujian
Gold	Umicore Precious Metals Thailand	Krung Thep Maha Nakhon
Gold	Geib Refining Corporation	Rhode Island
Gold	MMTC-PAMP India Pvt., Ltd.	Haryana
Gold	Singway Technology Co., Ltd.	Taoyuan
Gold	Al Etihad Gold LLC	Dubayy
Gold	Emirates Gold DMCC	Dubayy
Gold	T.C.A S.p.A	Toscana
Gold	Remondis Argentia B.V.	Noord-Brabant
Gold	Korea Zinc Co., Ltd.	Seoul-teukbyeolsi
Gold	Marsam Metals	São Paulo
Gold	SAAMP	Île-de-France
Gold	L'Orfebre S.A.	Andorra la Vella
Gold	Italpreziosi	Toscana
Gold	SAXONIA Edelmetalle GmbH	Sachsen
Gold	WIELAND Edelmetalle GmbH	Baden-Württemberg
Gold	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	Wien
Gold	AU Traders and Refiners	Gauteng

Metal	Processing Facility Name	Processing Facility Location
Gold	SungEel HiMetal Co., Ltd.	Jeollabuk-do
Gold	Planta Recuperadora de Metales SpA	Antofagasta
Gold	Safimet S.p.A	Toscana
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	Hunan
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	Ningxia
Tantalum	Asaka Riken Co., Ltd.	Fukushima
Tantalum	Guangdong Rising Rare Metals-EO Materials Ltd.	Guangdong
Tantalum	Exotech Inc.	Florida
Tantalum	F&X Electro-Materials Ltd.	Guangdong
Tantalum	Guangdong Zhiyuan New Material Co., Ltd.	Guangdong
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	Jiangxi
Tantalum	Jiujiang Tanbre Co., Ltd.	Jiangxi
Tantalum	LSM Brasil S.A.	Minas Gerais
Tantalum	Metallurgical Products India Pvt., Ltd.	Maharashtra
Tantalum	Mineracao Taboca S.A.	Amazonas
Tantalum	Mitsui Mining and Smelting Co., Ltd.	Fukuoka
Tantalum	NPM Silmet AS	Ida-Virumaa
Tantalum	QuantumClean	California
Tantalum	RFH Tantalum Smeltery Co., Ltd./Yanling Jincheng Tantalum & Niobium Co., Ltd.	Hunan
Tantalum	Solikamsk Magnesium Works OAO	Permskiy kray
Tantalum	Taki Chemical Co., Ltd.	Hyogo
Tantalum	Telex Metals	Pennsylvania
Tantalum	Ulba Metallurgical Plant JSC	Qaraghandy oblysy
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	Hunan
Tantalum	D Block Metals, LLC	North Carolina

Metal	Processing Facility Name	Processing Facility Location
Tantalum	FIR Metals & Resource Ltd.	Hunan
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	Jiangxi
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	Guangdong
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	Jiangxi
Tantalum	KEMET Blue Metals	Tamaulipas
Tantalum	H.C. Starck Co., Ltd.	Rayong
Tantalum	H.C. Starck Tantalum and Niobium GmbH	Niedersachsen
Tantalum	H.C. Starck Hermsdorf GmbH	Thüringen
Tantalum	H.C. Starck Inc.	Massachusetts
Tantalum	H.C. Starck Ltd.	Ibaraki
Tantalum	H.C. Starck Smelting GmbH & Co. KG	Baden-Württemberg
Tantalum	Global Advanced Metals Boyertown	Pennsylvania
Tantalum	Global Advanced Metals Aizu	Fukushima
Tantalum	KEMET Blue Powder	Nevada
Tantalum	Resind Industria e Comercio Ltda.	Minas gerais
Tantalum	Jiangxi Tuohong New Raw Material	Jiangxi
Tantalum	Power Resources Ltd.	Skopje
Tantalum	Jiujiang Janny New Material Co., Ltd.	Jiangxi
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	Hunan
Tin	Alpha	Pennsylvania
Tin	CV Gita Pesona	Kepulauan Bangka Belitung
Tin	PT Aries Kencana Sejahtera	Kepulauan Bangka Belitung
Tin	PT Premium Tin Indonesia	Kepulauan Bangka Belitung
Tin	CV United Smelting	Kepulauan Bangka Belitung
Tin	Dowa	Akita
Tin	EM Vinto	Oruro

Metal	Processing Facility Name	Processing Facility Location
Tin	Fenix Metals	Podkarpackie
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	Yunnan
Tin	Huichang Jinshunda Tin Co., Ltd.	Jiangxi
Tin	Gejiu Kai Meng Industry and Trade LLC	Yunnan
Tin	China Tin Group Co., Ltd.	Guangxi
Tin	Malaysia Smelting Corporation (MSC)	Pulau Pinang
Tin	Metallic Resources, Inc.	Ohio
Tin	Mineracao Taboca S.A.	São Paulo
Tin	Minsur	Ika
Tin	Mitsubishi Materials Corporation	Hyogo
Tin	Jiangxi New Nanshan Technology Ltd.	Jiangxi
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	Chon Buri
Tin	Operaciones Metalurgical S.A.	Oruro
Tin	PT Artha Cipta Langgeng	Kepulauan Bangka Belitung
Tin	PT Babel Inti Perkasa	Kepulauan Bangka Belitung
Tin	PT Bangka Tin Industry	Kepulauan Bangka Belitung
Tin	PT Belitung Industri Sejahtera	Kepulauan Bangka Belitung
Tin	PT Bukit Timah	Kepulauan Bangka Belitung
Tin	PT DS Jaya Abadi	Kepulauan Bangka Belitung
Tin	PT Karimun Mining	Kepulauan Riau
Tin	PT Mitra Stania Prima	Kepulauan Bangka Belitung
Tin	PT Panca Mega Persada	Kepulauan Bangka Belitung
Tin	PT Prima Timah Utama	Kepulauan Bangka Belitung
Tin	PT Refined Bangka Tin	Kepulauan Bangka Belitung
Tin	PT Sariwiguna Binasentosa	Kepulauan Bangka Belitung
Tin	PT Stanindo Inti Perkasa	Kepulauan Bangka Belitung

Metal	Processing Facility Name	Processing Facility Location
Tin	PT Sumber Jaya Indah	Kepulauan Bangka Belitung
Tin	PT Timah (Persero) Tbk Kundur	Riau
Tin	PT Timah (Persero) Tbk Mentok	Kepulauan Bangka Belitung
Tin	PT Tinindo Inter Nusa	Kepulauan Bangka Belitung
Tin	PT Tommy Utama	Kepulauan Bangka Belitung
Tin	Rui Da Hung	Taoyuan
Tin	Soft Metais Ltda.	São Paulo
Tin	Thaisarco	Phuket
Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	Yunnan
Tin	White Solder Metalurgia e Mineracao Ltda.	Rondônia
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	Yunnan
Tin	Yunnan Tin Company Limited	Yunnan
Tin	CV Venus Inti Perkasa	Kepulauan Bangka Belitung
Tin	Magnu’s Minerais Metais e Ligas Ltda.	Minas Gerais
Tin	Melt Metais e Ligas S.A.	Rondônia
Tin	PT ATD Makmur Mandiri Jaya	Kepulauan Bangka Belitung
Tin	O.M. Manufacturing Philippines, Inc.	Cavite
Tin	PT Inti Stania Prima	Kepulauan Bangka Belitung
Tin	CV Ayi Jaya	Kepulauan Bangka Belitung
Tin	CV Dua Sekawan	Kepulauan Bangka Belitung
Tin	CV Tiga Sekawan	Kepulauan Bangka Belitung
Tin	Resind Industria e Comercio Ltda.	Minas gerais
Tin	Metallo Belgium N.V.	Antwerpen
Tin	Metallo Spain S.L.U.	Bizkaia
Tin	PT Bangka Prima Tin	Kepulauan Bangka Belitung
Tin	PT Sukses Inti Makmur	Kepulauan Bangka Belitung

Metal	Processing Facility Name	Processing Facility Location
Tin	PT Kijang Jaya Mandiri	Kepulauan Bangka Belitung
Tin	PT Menara Cipta Mulia	Kepulauan Bangka Belitung
Tin	HuiChang Hill Tin Industry Co., Ltd.	Jiangxi
Tin	Gejiu Fengming Metallurgy Chemical Plant	Yunnan
Tin	Guanyang Guida Nonferrous Metal Smelting Plant	Guangxi
Tin	Modeltech Sdn Bhd	Melaka
Tin	PT Lautan Harmonis Sejahtera	Kepulauan Bangka Belitung
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	Guangdong
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	Nei Mongol
Tin	PT Bangka Serumpun	Kepulauan Bangka Belitung
Tungsten	H.C. Starck Smelting GmbH & Co. KG	Baden-Württemberg
Tungsten	A.L.M.T. TUNGSTEN Corp.	Toyama
Tungsten	Kennametal Huntsville	Alabama
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	Guangdong
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	Jiangxi
Tungsten	Fujian Jinxin Tungsten Co., Ltd.	Fujian
Tungsten	Global Tungsten & Powders Corp.	Pennsylvania
Tungsten	Hunan Chenzhou Mining Co., Ltd.	Hunan
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.	Hunan
Tungsten	Japan New Metals Co., Ltd.	Akita
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	Jiangxi
Tungsten	Kennametal Fallon	Nevada
Tungsten	Tejing (Vietnam) Tungsten Co., Ltd.	Tây Ninh
Tungsten	Wolfram Bergbau und Hutten AG	Steiermark
Tungsten	Xiamen Tungsten Co., Ltd.	Fujian
Tungsten	Xinhai Rendan Shaoguan Tungsten Co., Ltd.	Guangdong

Metal	Processing Facility Name	Processing Facility Location
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	Jiangxi
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	Jiangxi
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	Jiangxi
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	Jiangxi
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	Yunnan
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	Fujian
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	Jiangxi
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	Jiangxi
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.	Hunan
Tungsten	H.C. Starck Tungsten GmbH	Niedersachsen
Tungsten	Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC	Thái Nguyên
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	Jiangxi
Tungsten	Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji	Hunan
Tungsten	Niagara Refining LLC	New York
Tungsten	Ganzhou Haichuang Tungsten Co., Ltd.	Jiangxi
Tungsten	Hydrometallurg, JSC	Kabardino-Balkarskaya Respublika
Tungsten	Unecha Refractory metals plant	Bryanskaya oblast’
Tungsten	South-East Nonferrous Metal Company Limited of Hengyang City	Hunan
Tungsten	Philippine Chuangxin Industrial Co., Inc.	Bulacan
Tungsten	Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.	Jiangxi
Tungsten	ACL Metais Eireli	São Paulo
Tungsten	Woltech Korea Co., Ltd.	Gyeongsangbuk-do
Tungsten	Moliren Ltd.	Moskovskaja oblast’

Table 2. Active processing facilities as of March 7, 2019.

The following processing facilities that were reported as being in the Company's supply chain have been confirmed as Active:

Metal	Processing Facility Name	Processing Facility Location
Gold	Chugai Mining	Tokyo
Gold	KGHM Polska Miedz Spolka Akcyjna	Dolnośląskie
Gold	Bangalore Refinery	Karnataka
Tin	Gejiu Zili Mining And Metallurgy Co., Ltd.	Yunnan

Table 3. Processing facilities not Conformant or Active as of March 7, 2019.

The following processing facilities that were reported as being in the Company's supply chain have not been confirmed as Conformant or Active:

Metal	Processing Facility Name	Processing Facility Location
Gold	Abington Reldan Metals, LLC	Pennsylvania
Gold	Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	İstanbul
Gold	Caridad	Sonora
Gold	Yunnan Copper Industry Co., Ltd.	Yunnan
Gold	Daye Non-Ferrous Metals Mining Ltd.	Hubei
Gold	Refinery of Seemine Gold Co., Ltd.	Gansu
Gold	Guoda Safina High-Tech Environmental Refinery Co., Ltd.	Shandong

Metal	Processing Facility Name	Processing Facility Location
Gold	Hangzhou Fuchunjiang Smelting Co., Ltd.	Zhejiang
Gold	Hunan Chenzhou Mining Co., Ltd.	Hunan
Gold	HwaSeong CJ CO., LTD.	Gyeonggi-do
Gold	JSC Ekaterinburg Non-Ferrous Metal Processing Plant	Sverdlovskaya oblast'
Gold	Kazakhmys Smelting LLC	Qaraghandy oblysy
Gold	L'azurde Company For Jewelry	Ar Riyad
Gold	Lingbao Gold Co., Ltd.	Henan
Gold	Lingbao Jinyuan Tonghui Refinery Co., Ltd.	Henan
Gold	Luoyang Zijin Yinhui Gold Refinery Co., Ltd.	Henan
Gold	Navoi Mining and Metallurgical Combinat	Navoiy
Gold	Penglai Penggang Gold Industry Co., Ltd.	Shandong
Gold	Sabin Metal Corp.	North Dakota
Gold	Samwon Metals Corp.	Gyeongsangnam-do
Gold	Shandong Tiancheng Biological Gold Industrial Co., Ltd.	Shandong
Gold	Great Wall Precious Metals Co., Ltd. of CBPM	Sichuan
Gold	Tongling Nonferrous Metals Group Co., Ltd.	Anhui
Gold	Morris and Watson	Auckland

Metal	Processing Facility Name	Processing Facility Location
Gold	SAFINA A.S.	Praha-západ
Gold	Guangdong Jinding Gold Limited	Guangdong
Gold	Fidelity Printers and Refiners Ltd.	Harare
Gold	Kaloti Precious Metals	Dubayy
Gold	Sudan Gold Refinery	Khartoum
Gold	Tony Goetz NV	Antwerpen
Gold	TOO Tau-Ken-Altyn	Almaty
Gold	GCC Gujrat Gold Centre Pvt. Ltd.	Gujarat
Gold	Sai Refinery	Himachal Pradesh
Gold	Universal Precious Metals Refining Zambia	Lusaka
Gold	Modeltech Sdn Bhd	Melaka
Gold	Kyshtym Copper-Electrolytic Plant ZAO	Chelyabinskaya oblast’
Gold	Morris and Watson Gold Coast	Queensland
Gold	Degussa Sonne / Mond Goldhandel GmbH	Baden-Württemberg
Gold	Pease & Curren	Rhode Island
Gold	State Research Institute Center for Physical Sciences and Technology	Vilnius
Tin	Estanho de Rondonia S.A.	Rondônia
Tin	Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company	Cao Bang

Metal	Processing Facility Name	Processing Facility Location
Tin	Nghe Tinh Non-Ferrous Metals Joint Stock Company	Nghe An
Tin	Tuyen Quang Non-Ferrous Metals Joint Stock Company	Tuyên Quang
Tin	An Vinh Joint Stock Mineral Processing Company	Nghe An
Tin	Super Ligas	São Paulo
Tungsten	Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.	Jiangxi