

TOTAL S.A.
Form SD
May 31, 2018

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

FORM SD
Specialized Disclosure Report

TOTAL S.A.
(Exact name of registrant as specified in its charter)

Republic of France
(State or other jurisdiction of
incorporation or organization)

001-10888
(Commission File
Number)
2, place Jean Millier

98-0227345
(IRS Employer
Identification No.)

La Défense 6
92400 Courbevoie

France

(Address of principal executive offices) (Zip Code)

Patrick de La Chevardière

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Chief Financial Officer

Tel: +33 (0)1 47 44 45 46

Fax: +33 (0)1 47 44 49 44

**(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, 2017.

TOTAL S.A. is providing on this Form SD disclosure in accordance with Rule 13p-1 under the Securities Exchange Act of 1934, as amended.

Section 1 Conflict Minerals Disclosure

Item 1.01(b)

CONFLICT MINERALS DISCLOSURE

TOTAL S.A. (collectively with its subsidiaries and affiliates, TOTAL or the Group) is providing herein disclosure in accordance with Rule 13p-1 (the Rule) under the Securities Exchange Act of 1934, as amended, which implements reporting and disclosure requirements related to certain minerals (referred to as conflict minerals under the Rule) as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. Conflict Minerals are defined in the Rule as the following minerals (regardless of their geographic origin): cassiterite, columbite-tantalite, gold, wolframite and certain derivatives of these minerals (*i.e.*, tin, tantalum and tungsten).

TOTAL has established a management system to implement a diligence and reporting process concerning Conflict Minerals in accordance with the Rule. The Group's diligence process is coordinated at the Holding level with division coordinators designated at each of the following business segments and operational entities: Exploration & Production, Gas, Renewables & Power, Refining & Chemicals, Trading & Shipping, Marketing & Services and Total Global Procurement¹. Business managers, purchasing departments and/or suppliers within each such segment and operational entity were surveyed to determine if any conflict minerals had been included in products sold by Group affiliates in calendar year 2017. The diligence process with respect to Hutchinson S.A. and its affiliates, a subsidiary in the Refining & Chemicals segment, for the calendar year 2017 is currently still in progress. TOTAL intends to file an amendment to this Form SD to provide disclosure in accordance with the Rule.

Based on the responses received, it was determined that Saft Groupe S.A. and its affiliates (Saft), a subsidiary in the Gas, Renewables & Power segment, had manufactured, or contracted to have manufactured, certain products that contained Conflict Minerals, namely tin, tantalum, tungsten and/or gold, that were necessary to the functionality of those products (the Necessary Conflict Minerals). Relevant products included cells and batteries containing electronic devices and harnesses for use in transportation, telecom, electricity grid, space & defense and civil electronic applications.

As a result, Saft conducted in good faith a reasonable country of origin inquiry regarding the Necessary Conflict Minerals that was designed to determine whether any of them had originated in the Democratic Republic of the Congo or an adjoining country (each a Covered Country , as defined in the Rule) or were from recycled or scrap sources. As part of the reasonable country of origin inquiry, Saft surveyed all of its suppliers (by means of questionnaires, forms or other formats) in order to determine the country of origin of the Necessary Conflict Minerals.

Based on the suppliers' responses, it was determined that a substantial percentage in terms of absolute numbers, volume supplied and purchasing spend of Saft's suppliers certified that the Necessary Conflict Minerals supplied to it either originated from recycled or scrap sources or did not originate from the Covered Countries. A limited percentage of suppliers in absolute numbers, volume supplied and purchase spend sourced Necessary Conflict Minerals in 2017 from one or more of the Covered Countries. A review of these suppliers by Saft revealed them to be reputable, and mainly included major suppliers of the aviation and space industries, electronics and electrical components suppliers that are publically traded in Europe and the United States. In some instances, the origin of some of the Necessary Conflict Minerals could be traced to smelters that are compliant with the Responsible Minerals Assurance Process Initiative assessment protocol as set forth by the Responsible Minerals Initiative (formerly the Conflict-Free Sourcing Initiative). Moreover, Saft's contracts with its suppliers require them to source responsibly, and Saft maintains an active dialogue with its suppliers on this topic. As a result, Saft does not have any reason to believe that their Necessary Conflict Minerals sourced in Covered Countries in calendar year 2017 directly or indirectly financed or benefitted armed groups. With respect to non-respondents to Saft's country of origin questionnaires, which represented a small percentage of suppliers in absolute numbers, volume supplied

- ¹ *Since January 1, 2017, Total Global Procurement covers a large proportion of the Group's goods and services purchasing, with the exception of crude oil and petroleum product purchasing by Trading & Shipping, gas and electricity purchasing by TOTAL Gas & Power Ltd. and the purchases made by Hutchinson S.A., Saft Groupe S.A. and SunPower Corporation.*

and purchasing spend, diligence performed by Saft revealed no reason to believe such suppliers may have sourced the Necessary Conflict Minerals from a Covered Country.

In addition, SunPower Corporation, an American company listed on NASDAQ and based in San Jose, California (SunPower), is subject to the Rule and separately publishes information concerning its use of Conflict Minerals in certain of its products that it manufactured or contracted to manufacture (solar panels, balance of systems components). The text of SunPower's disclosure for calendar year 2017 provided on its Form SD is included in Annex A to this document.

TOTAL is committed to responsible economic and social development in Africa.

TOTAL monitors responsible practices among its suppliers. In its Code of Conduct, TOTAL states that it works with its suppliers to ensure the protection of the interests of both parties on the basis of clear and fairly negotiated contractual conditions. This relationship is founded on three key principles: dialogue, professionalism and adherence to commitments.

TOTAL expects its suppliers to:

adhere to principles equivalent to those in its own Code of Conduct, such as those set out in the Group's Fundamental Principles of Purchasing Directive (see below);

agree to be audited;

be particularly attentive to the human rights-related aspects of their standards and procedures, in particular their employees' working conditions; and

ensure that their own suppliers and contractors respect equivalent principles.

The Fundamental Principles of Purchasing, launched in 2010 and formally set out in a Group directive in 2014 (the Directive), specify the commitments that TOTAL expects of its suppliers in the following areas:

respect for human rights at work;

health protection;

assurance of safety and security;

preservation of the environment;

prevention of corruption, conflicts of interest and fraud;

respect for competition law; and

the promotion of economic and social development.

The Directive's principles, which apply to all of the Group's companies, are included or transposed in the agreements concluded with suppliers. In addition, these principles are available for consultation by all suppliers in both French and English in the Suppliers section on TOTAL's Internet website at:

<https://www.total.com/en/suppliers/sustainable-purchasing-day-day-commitment>.

Questionnaires focused on environmental and societal issues are used to gather more in-depth information from suppliers about their approach to these subjects, either during pre-qualification or as part of an audit. Supplier relations are also considered from an environmental and societal perspective on occasion as part of ethical assessments of Group subsidiaries and entities.

This conflict minerals disclosure is also available on TOTAL's Internet website at:

<http://www.sustainable-performance.total.com/en/challenges/supply-chain-management>.

¹ *As of December 31, 2017, the Group held 56.26% of the outstanding share capital of SunPower.*

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.

TOTAL S.A.

Date: May 31, 2018

By: /s/ PATRICK DE LA CHEVARDIERE
Name: Patrick de LA CHEVARDIERE
Title: Chief Financial Officer

SunPower Corporation

Conflict Minerals Disclosure

SunPower Corporation has included this Conflict Minerals Report as an exhibit to its Form SD for 2017 as provided for in Rule 13p-1 under the Securities Exchange Act of 1934, as amended (the Exchange Act), and Form SD (collectively, the Conflict Minerals Rule). The date of filing of this Conflict Minerals Report is May 30, 2018.

Unless the context indicates otherwise, the term SunPower refers to SunPower Corporation and its consolidated subsidiaries, and Service Provider refers to the third party retained by SunPower to assist with supplier outreach and data validation of the responses received from suppliers. Some of the compliance activities described in this Conflict Minerals Report were performed by the Service Provider in coordination with SunPower. As used herein and consistent with the Conflict Minerals Rule, Conflict Minerals or 3TG are columbite-tantalite (coltan), cassiterite, gold, wolframite and the derivatives tantalum, tin and tungsten, without regard to the location of origin of the minerals or derivative metals.

This Conflict Minerals Report can be found on the SunPower website at: <http://investors.sunpower.com/sec.cfm>.

Forward-Looking Statements

This document contains forward-looking statements within the meaning of Section 27A of the Securities Act of 1933, as amended (the Securities Act), and Section 21E of the Exchange Act. In particular, statements contained in this document that are not historical facts, including, but not limited to, statements concerning the additional steps that SunPower intends to take to mitigate the risk that its necessary 3TG benefit armed groups, constitute forward-looking statements and are made under the safe harbor provisions of Section 27A of the Securities Act and Section 21E of the Exchange Act.

Forward-looking statements are subject to risks and uncertainties that could cause actual actions or performance to differ materially from those expressed in the forward-looking statements. These risks and uncertainties may include, but are not limited to, (1) the continued implementation of satisfactory traceability and other compliance measures by SunPower's direct and indirect suppliers on a timely basis or at all, (2) whether smelters and refiners and other market participants responsibly source 3TG and (3) political and regulatory developments, whether in the Democratic Republic of the Congo (the DRC) or an adjoining country (collectively, the Covered Countries), the United States or elsewhere. SunPower cautions readers not to place undue reliance on any forward-looking statements, which only speak as of the date made. SunPower undertakes no obligation to update any forward-looking statement to reflect events or circumstances after the date on which such statement is made.

Overview; SunPower's Products and Applicability of the Conflict Minerals Rule

SunPower is a leading global energy company that delivers complete solar solutions to residential, commercial, and power plant customers worldwide through an array of hardware, software, and financing options and through utility-scale solar power system construction and development capabilities, operations and maintenance services, and Smart Energy solutions. SunPower products include solar panels and balance of systems components that can include inverters, combiner boxes, racking systems, mechanical and motorized systems, and electrical tracking, monitoring and controller systems. Each of the product areas that SunPower manufactures and contracts to manufacture contains 3TG which is necessary to the functionality or production of such products. However, 3TG content continues to represent a small portion of the materials content of SunPower's products. For 2017, SunPower was unable to determine the origin of at least a portion of the necessary 3TG in each of its products.

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For a further discussion of SunPower's products, see its Annual Report on Form 10-K for the fiscal year ended December 31, 2017. The information contained in the Form 10-K is not incorporated by reference into this Conflict Minerals Report or SunPower's Form SD for 2017 and should not be considered part of this Conflict Minerals Report or the Form SD.

¹ *Definitions provided in this Annex are exclusive to this section.*

SunPower is committed to human rights. As a result of this commitment, SunPower commenced its 3TG diligence activities in 2011, well before the adoption of the Conflict Minerals Rule.

SunPower is multiple levels removed from the mining of minerals (3TG or otherwise). SunPower does not make purchases of raw ore or refined minerals directly from smelters or refiners and makes no purchases in the Covered Countries. However, through the efforts described in this Conflict Minerals Report, SunPower seeks to ensure its suppliers are sourcing responsibly.

SunPower does not seek to embargo sourcing of 3TG from the Covered Countries and encourages its suppliers to continue to source 3TG responsibly from the region.

Reasonable Country of Origin Inquiry

To complete the reasonable country of origin inquiry (the RCOI) required by the Conflict Minerals Rule, SunPower and its Service Provider engaged with suppliers to collect information about the presence and source of 3TG used in products and components supplied to SunPower. For its RCOI, to the extent applicable, SunPower utilized the same processes and procedures as for its due diligence, in particular Steps 1 and 2 of the OECD Guidance (as defined below), which are discussed later in this Conflict Minerals Report.

The results of SunPower's RCOI are discussed under Findings Covering Smelters, Refiners and Country of Origin Information.

Due Diligence Framework

SunPower utilizes due diligence measures for 3TG that are intended to conform with, in all material respects, the criteria set forth in the Organisation for Economic Co-operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including the Supplement on Tin, Tantalum and Tungsten and the Supplement on Gold (Third Edition) (the OECD Guidance).

The OECD Guidance established a five-step framework for due diligence as a basis for responsible global supply chain management of minerals from conflict-affected and high-risk areas. SunPower's application of this framework and selected due diligence measures are discussed in this section and within Due Diligence Program Execution. Application of the framework constitutes a part of the program that SunPower has put in place to help ensure that the 3TG contained in its products are responsibly sourced.

In an effort to increase supplier awareness about conflict minerals and related regulatory requirements, provide answers to frequently asked questions concerning 3TG mineral tracing, and ultimately improve the accuracy and completeness of supplier responses, suppliers that were part of SunPower's outreach received access to the Service Provider's online resources.

Compliance Team

In support of its compliance efforts, SunPower has a compliance team that is charged with overseeing, implementing and providing feedback on its 3TG compliance strategy. The team consists of staff from SunPower's legal and operations groups, under executive leadership of our Executive Vice President, Global Operations. The members of the team and selected other internal personnel are trained on the Conflict Minerals Rule, the OECD Guidance, SunPower's compliance plan, and the procedures for reviewing and validating supplier responses to its inquiries.

SunPower also utilizes the Service Provider and specialist outside counsel to assist with and/or to advise it on certain aspects of its compliance.

Conflict Minerals Policy; Grievance Mechanism

SunPower has adopted a Conflict Minerals Policy. Under the Conflict Minerals Policy, SunPower suppliers are required to acknowledge SunPower's Supplier Sustainability Guidelines, which includes the Conflict Minerals Policy.

The Conflict Minerals Policy indicates that SunPower will evaluate its relationships with its suppliers on an ongoing basis to ensure continued compliance with the policy. Under the Conflict Minerals Policy, SunPower reserves the right to request additional documentation from its suppliers regarding the source of any 3TG included in their products. In addition, SunPower reserves the right to ask for suppliers to maintain traceability data for a minimum of five years.

The Conflict Minerals Policy is communicated internally to SunPower's supply chain employees and to suppliers. In addition, the Conflict Minerals Policy is posted on SunPower's website at <https://us.sunpower.com/sites/sunpower/files/media-library/compliance-briefs/cb-sunpower-conflict-minerals-policy.pdf>.

SunPower has a grievance mechanism for reporting violations of its Conflict Minerals Policy. The grievance mechanism is indicated in the Conflict Minerals Policy. Violations may be reported by calling SunPower's Compliance and Ethics Helpline at 1-866-307-5679 within the United States, or at toll-free numbers provided for twenty additional countries/regions in SunPower's Code of Business Conduct and Ethics available on its investor relations website at investors.sunpower.com, or by going to SunPower's reporting website at <https://sunpower.alertline.com>, <https://sunpowereu.alertline.com> (for employees in Europe, except Spain) or <https://sunpowersp.alertline.com> (for employees in Spain).

Data Collection; Records Storage and Retention

SunPower uses the Conflict Minerals Reporting Template (the CMRT) developed by the Responsible Minerals Initiative (the RMI; formerly known as the Conflict-Free Sourcing Initiative) to gather information on the use of 3TG by its suppliers, the source of the 3TG and the suppliers' related compliance procedures. For the 2017 reporting year, only CMRT's version 4.0 or higher was accepted. SunPower gave suppliers the ability to provide information at a level at which they could most readily assemble the information (i.e. company, product, or user-defined), but required suppliers to declare the level of information provided.

SunPower has an internal electronic file for the maintenance of business records relating to 3TG due diligence, including records of due diligence processes, findings and resulting decisions. SunPower stores all supplier CMRTs and documents evidence of identified supplier 3TG sourcing risk. As contemplated by the OECD Guidance, SunPower will maintain these records for at least five years. The Service Provider also is requested to maintain records in its possession for at least five years.

Supplier Acknowledgements

SunPower requires its direct suppliers to provide the acknowledgements contemplated by its Conflict Minerals Policy, as described above.

3TG Risk Management

SunPower obtains information on 3TG sourcing risk from a variety of sources, including through interactions with its peers and the Service Provider. SunPower further uses the CMRT to identify 3TG sourcing risk. As an additional measure, SunPower previously has asked a large cross section of its suppliers to respond to 3TG scoping questions. Given SunPower's position in the 3TG supply chain, it believes that these are the most efficient means for identifying 3TG sourcing risk.

Supply chain managers within SunPower work with the compliance team to identify 3TG sourcing concerns and determine risk mitigation efforts. The compliance team reports aggregated risk findings to and the contents of this Conflict Minerals Report are shared with SunPower's executive management.

SunPower determines on a case-by-case basis the appropriate risk mitigation strategy for any identified risks. Potential outcomes under SunPower's risk mitigation strategy include continuing to work with the supplier while risks are addressed or reassessing the relationship with the supplier. Under SunPower's risk management framework, to the extent that risks require mitigation, SunPower monitors and tracks the performance of the risk mitigation efforts and reports these efforts to appropriate senior oversight personnel.

Utilization of Independent Third-Party Audits

To the extent that smelters or refiners are identified, SunPower primarily utilizes information made available by the RMI concerning independent third-party audits and Conformant (as defined later) status. SunPower also relies on audits performed by the London Bullion Market Association's (the LBMA) Good Delivery Program and the Responsible Jewellery Council's (the RJC) Chain-of-Custody Certification.

Report on Supply Chain Due Diligence

SunPower files a Form SD and a Conflict Minerals Report with the Securities and Exchange Commission and makes these filings available on its investor relations website.

Due Diligence Program Execution

In furtherance of SunPower's 3TG due diligence, it performed the due diligence measures discussed below for 2017. For a discussion of the design of SunPower's due diligence measures, see Due Diligence Framework.

SunPower's outreach included 101 suppliers (the Suppliers) that (1) contracted to manufacture products for SunPower which were determined by SunPower to contain or potentially contain 3TG which is necessary to the functionality or production of the products, or (2) provided components, parts, or products which were determined by SunPower to contain or potentially contain necessary 3TG, and which were incorporated into products manufactured by SunPower.

SunPower carried out due diligence on parts selected by SunPower within the bills of materials of products that were contracted to be manufactured. The contract manufacturer carried out due diligence for general use parts of products that were contracted to be manufactured, the results of which were reflected in their CMRTs.

Specifically, SunPower took the following steps in connection with the execution of its due diligence:

1. Reviewed products manufactured in 2017 and determined which components of those products might contain 3TG (including by requiring product specifications and supply chain records including bills of material, and making engineering inquiries). Lists of 2017 suppliers were gathered for the commodities and components in question. Suppliers also were considered in-scope for 2017 if they reported use of 3TG in the 2016 reporting year and were again a supplier in 2017.
2. SunPower sent Suppliers a request to submit a CMRT. SunPower and the Service Provider reviewed CMRT responses received from the Suppliers for incomplete responses, potential errors or inaccuracies, lack of consistency, and other flags. If any quality control flags were raised, Suppliers were contacted to clarify the concern. Suppliers were requested to provide an electronic signature before submitting their data to SunPower to verify that all answers submitted were accurate to the best of each Supplier's knowledge.
3. Following the initial introductions to the program and information request, up to four reminder emails were sent to each non-responsive Supplier requesting survey completion.
4. If a smelter was not on the CMRT Smelter Look-up tab list, the Service Provider (a) requested that the Supplier confirm that the listed entity was a smelter or refiner, (b) consulted publicly-available information to attempt to determine whether the identified entity was a smelter or refiner, or (c) attempted to contact the listed entity.
5. If the smelter or refiner was not identified as Conformant or the equivalent by the RMI, the LMBA or the RJC, SunPower or the Service Provider attempted to contact the smelter or refiner to gain more information about its sourcing practices, including countries of origin and transfer and due diligence procedures.
6. To the extent that no contact was made with a smelter or refiner identified by a Supplier, SunPower or the Service Provider searched public information to attempt to determine the mine or location of origin of the 3TG processed by the smelter or refiner and whether it obtains 3TG from sources that directly or indirectly finance or benefit armed groups in a Covered Country.

Findings Covering Smelters, Refiners and Country of Origin Information

For 2017, SunPower received 37 Supplier responses to its outreach. The CMRT declarations received identified 299 smelters and refiners that processed or may have processed 3TG contained in SunPower's products. Of these 37 CMRT declarations, 23 were company-level, 11 were product-level, and 3 were at a level defined by the Supplier. Due to the number of Suppliers providing company-level declarations, the list of processing facilities disclosed below may over-represent the number of 3TG processing facilities in SunPower's supply chain.

In brief, as indicated in the table below:

299 smelters and refiners were identified by the Suppliers.

241 smelters and refiners, or 80%, were listed as Conformant by the RMI.

5 smelters or refiners, or 2%, were listed as Active.

53 smelters or refiners, or 18%, were listed on the Smelter Look-up tab only.

In connection with SunPower's RCOI or due diligence, as applicable, the Suppliers identified to SunPower the facilities listed below as potentially having processed the necessary 3TG contained in SunPower's in-scope products in 2017 (table information is as of May 21, 2018; see the notes following the table for additional information concerning the information presented in the table).

| Metal | Smelter or Refiner Name | Smelter or Refiner Country | Status |
|--------------|---------------------------------------------------------------|-----------------------------------|---------------|
| Gold | Advanced Chemical Company | United States of America | Conformant |
| Gold | Aida Chemical Industries Co., Ltd. | Japan | Conformant |
| Gold | Al Etihad Gold LLC | United Arab Emirates | Conformant |
| Gold | Allgemeine Gold-und Silberscheideanstalt A.G. | Germany | Conformant |
| Gold | Almalyk Mining and Metallurgical Complex (AMMC) | Uzbekistan | Conformant |
| Gold | AngloGold Ashanti Corrego do Sitio Mineracao | Brazil | Conformant |
| Gold | Argor-Heraeus S.A. | Switzerland | Conformant |
| Gold | Asahi Pretec Corp. | Japan | Conformant |
| Gold | Asahi Refining Canada Ltd. | Canada | Conformant |
| Gold | Asahi Refining USA Inc. | United States of America | Conformant |
| Gold | Asaka Riken Co., Ltd. | Japan | Conformant |
| Gold | AU Traders and Refiners | South Africa | Conformant |
| Gold | Aurubis AG | Germany | Conformant |
| Gold | Bangko Sentral ng Pilipinas (Central Bank of the Philippines) | Philippines | Conformant |
| Gold | Boliden AB | Sweden | Conformant |
| Gold | C. Hafner GmbH + Co. KG | Germany | Conformant |
| Gold | CCR Refinery - Glencore Canada Corporation | Canada | Conformant |
| Gold | Cendres + Metaux S.A. | Switzerland | Conformant |
| Gold | Chimet S.p.A. | Italy | Conformant |
| Gold | Daejin Indus Co., Ltd. | Korea, Republic of | Conformant |
| Gold | DODUCO Contacts and Refining GmbH | Germany | Conformant |
| Gold | Dowa | Japan | Conformant |

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| | | | |
|------|-----------------------------------------------------------------|--------------------------|------------|
| Gold | DSC (Do Sung Corporation) | Korea, Republic of | Conformant |
| Gold | Eco-System Recycling Co., Ltd. | Japan | Conformant |
| Gold | Emirates Gold DMCC | United Arab Emirates | Conformant |
| Gold | Geib Refining Corporation | United States of America | Conformant |
| Gold | Gold Refinery of Zijin Mining Group Co., Ltd. | China | Conformant |
| Gold | HeeSung Metal Ltd. | Korea, Republic of | Conformant |
| Gold | Heimerle + Meule GmbH | Germany | Conformant |
| Gold | Heraeus Metals Hong Kong Ltd. | China | Conformant |
| Gold | Heraeus Precious Metals GmbH & Co. KG | Germany | Conformant |
| Gold | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd. | China | Conformant |
| Gold | Ishifuku Metal Industry Co., Ltd. | Japan | Conformant |

| | | | |
|------|---------------------------------------------------------------------------|--------------------------|------------|
| Gold | Istanbul Gold Refinery | Turkey | Conformant |
| Gold | Italpreziosi | Italy | Conformant |
| Gold | Japan Mint | Japan | Conformant |
| Gold | Jiangxi Copper Co., Ltd. | China | Conformant |
| Gold | JSC Uralelectromed | Russian Federation | Conformant |
| Gold | JX Nippon Mining & Metals Co., Ltd. | Japan | Conformant |
| Gold | Kazzinc | Kazakhstan | Conformant |
| Gold | Kennecott Utah Copper LLC | United States of America | Conformant |
| Gold | Kojima Chemicals Co., Ltd. | Japan | Conformant |
| Gold | Korea Zinc Co., Ltd. | Korea, Republic of | Conformant |
| Gold | Kyrgyzaltyn JSC | Kyrgyzstan | Conformant |
| Gold | LS-NIKKO Copper Inc. | Korea, Republic of | Conformant |
| Gold | Marsam Metals | Brazil | Conformant |
| Gold | Materion | United States of America | Conformant |
| Gold | Matsuda Sangyo Co., Ltd. | Japan | Conformant |
| Gold | Metalor Technologies (Hong Kong) Ltd. | China | Conformant |
| Gold | Metalor Technologies (Singapore) Pte., Ltd. | Singapore | Conformant |
| Gold | Metalor Technologies (Suzhou) Ltd. | China | Conformant |
| Gold | Metalor Technologies S.A. | Switzerland | Conformant |
| Gold | Metalor USA Refining Corporation | United States of America | Conformant |
| Gold | Metalurgica Met-Mex Penoles S.A. De C.V. | Mexico | Conformant |
| Gold | Mitsubishi Materials Corporation | Japan | Conformant |
| Gold | Mitsui Mining and Smelting Co., Ltd. | Japan | Conformant |
| Gold | MMTC-PAMP India Pvt., Ltd. | India | Conformant |
| Gold | Moscow Special Alloys Processing Plant | Russian Federation | Conformant |
| Gold | Nadir Metal Rafineri San. Ve Tic. A.S. | Turkey | Conformant |
| Gold | Nihon Material Co., Ltd. | Japan | Conformant |
| Gold | Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH | Austria | Conformant |
| Gold | Ohura Precious Metal Industry Co., Ltd. | Japan | Conformant |
| Gold | OJSC The Gulidov Krasnoyarsk Non-Ferrous Metals Plant (OJSC Krastsvetmet) | Russian Federation | Conformant |
| Gold | OJSC Novosibirsk Refinery | Russian Federation | Conformant |
| Gold | PAMP S.A. | Switzerland | Conformant |
| Gold | Planta Recuperadora de Metales SpA | Chile | Conformant |
| Gold | Prioksky Plant of Non-Ferrous Metals | Russian Federation | Conformant |
| Gold | PT Aneka Tambang (Persero) Tbk | Indonesia | Conformant |
| Gold | PX Precinox S.A. | Switzerland | Conformant |
| Gold | Rand Refinery (Pty) Ltd. | South Africa | Conformant |
| Gold | Republic Metals Corporation | United States of America | Conformant |
| Gold | Royal Canadian Mint | Canada | Conformant |
| Gold | SAAMP | France | Conformant |
| Gold | Safimet S.p.A | Italy | Conformant |
| Gold | SAFINA A.S. | Czech Republic | Conformant |
| Gold | Samduck Precious Metals | Korea, Republic of | Conformant |

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Gold SAXONIA Edelmetalle GmbH

Germany

Conformant

7

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| | | | |
|------|------------------------------------------------------|---------------------------|----------------------------------|
| Gold | SEMPSA Joyeria Plateria S.A. | Spain | Conformant |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd. | China | Conformant |
| Gold | Sichuan Tianze Precious Metals Co., Ltd. | China | Conformant |
| Gold | Singway Technology Co., Ltd. | Taiwan, Province of China | Conformant |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals | Russian Federation | Conformant |
| Gold | Solar Applied Materials Technology Corp. | Taiwan, Province of China | Conformant |
| Gold | Sumitomo Metal Mining Co., Ltd. | Japan | Conformant |
| Gold | SungEel HiMetal Co., Ltd. | Korea, Republic of | Conformant |
| Gold | T.C.A S.p.A | Italy | Conformant |
| Gold | Tanaka Kikinzoku Kogyo K.K. | Japan | Conformant |
| Gold | The Refinery of Shandong Gold Mining Co., Ltd. | China | Conformant |
| Gold | Tokuriki Honten Co., Ltd. | Japan | Conformant |
| Gold | Torecom | Korea, Republic of | Conformant |
| Gold | Umicore Brasil Ltda. | Brazil | Conformant |
| Gold | Umicore Precious Metals Thailand | Thailand | Conformant |
| Gold | Umicore S.A. Business Unit Precious Metals Refining | Belgium | Conformant |
| Gold | United Precious Metal Refining, Inc. | United States of America | Conformant |
| Gold | Valcambi S.A. | Switzerland | Conformant |
| Gold | Western Australian Mint (T/a The Perth Mint) | Australia | Conformant |
| Gold | WIELAND Edelmetalle GmbH | Germany | Conformant |
| Gold | Yamakin Co., Ltd. | Japan | Conformant |
| Gold | Yokohama Metal Co., Ltd. | Japan | Conformant |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation | China | Conformant |
| Gold | Bangalore Refinery | India | Active |
| Gold | KGHM Polska Miedz Spolka Akcyjna | Poland | Active |
| Gold | L Orfebre S.A. | Andorra | Active |
| Gold | Remondis Argentia B.V. | Netherlands | Active |
| Gold | Abington Reldan Metals, LLC | United States of America | On Smelter Look-Up Tab List Only |
| Gold | Atasay Kuyumculuk Sanayi Ve Ticaret A.S. | Turkey | On Smelter Look-Up Tab List Only |
| Gold | Caridad | Mexico | On Smelter Look-Up Tab List Only |
| Gold | Chugai Mining | Japan | On Smelter Look-Up Tab List Only |
| Gold | Daye Non-Ferrous Metals Mining Ltd. | China | On Smelter Look-Up Tab List Only |
| Gold | Degussa Sonne / Mond Goldhandel GmbH | Germany | On Smelter Look-Up Tab List Only |
| Gold | Elemental Refining, LLC | United States of America | On Smelter Look-Up Tab List Only |
| Gold | Fidelity Printers and Refiners Ltd. | Zimbabwe | On Smelter Look-Up Tab List Only |
| Gold | GCC Gujrat Gold Centre Pvt. Ltd. | India | On Smelter Look-Up Tab List Only |
| Gold | Great Wall Precious Metals Co., Ltd. of CBPM | China | On Smelter Look-Up Tab List Only |
| Gold | Guangdong Jinding Gold Limited | China | On Smelter Look-Up Tab List Only |
| Gold | | China | On Smelter Look-Up Tab List Only |

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|------|------------------------------------------------------------|--------------------|----------------------------------|
| | Guoda Safina High-Tech Environmental Refinery Co., Ltd. | | |
| Gold | Hangzhou Fuchunjiang Smelting Co., Ltd. | China | On Smelter Look-Up Tab List Only |
| Gold | HwaSeong CJ CO., LTD. | Korea, Republic of | On Smelter Look-Up Tab List Only |
| Gold | JSC Ekaterinburg Non-Ferrous Metal Processing Plant | Russian Federation | On Smelter Look-Up Tab List Only |

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|----------|----------------------------------------------------------------------|--------------------------|----------------------------------|
| Gold | Kaloti Precious Metals | United Arab Emirates | On Smelter Look-Up Tab List Only |
| Gold | Kazakhmys Smelting LLC | Kazakhstan | On Smelter Look-Up Tab List Only |
| Gold | Kyshtym Copper-Electrolytic Plant ZAO | Russian Federation | On Smelter Look-Up Tab List Only |
| Gold | L azurde Company For Jewelry | Saudi Arabia | On Smelter Look-Up Tab List Only |
| Gold | Lingbao Gold Co., Ltd. | China | On Smelter Look-Up Tab List Only |
| Gold | Lingbao Jinyuan Tonghui Refinery Co., Ltd. | China | On Smelter Look-Up Tab List Only |
| Gold | Luoyang Zijin Yinhui Gold Refinery Co., Ltd. | China | On Smelter Look-Up Tab List Only |
| Gold | Morris and Watson | New Zealand | On Smelter Look-Up Tab List Only |
| Gold | Morris and Watson Gold Coast | Australia | On Smelter Look-Up Tab List Only |
| Gold | Navoi Mining and Metallurgical Combinat | Uzbekistan | On Smelter Look-Up Tab List Only |
| Gold | Pease & Curren | United States of America | On Smelter Look-Up Tab List Only |
| Gold | Penglai Penggang Gold Industry Co., Ltd. | China | On Smelter Look-Up Tab List Only |
| Gold | Refinery of Seemine Gold Co., Ltd. | China | On Smelter Look-Up Tab List Only |
| Gold | Sabin Metal Corp. | United States of America | On Smelter Look-Up Tab List Only |
| Gold | Sai Refinery | India | On Smelter Look-Up Tab List Only |
| Gold | SAMWON METALS Corp. | Korea, Republic of | On Smelter Look-Up Tab List Only |
| Gold | Shandong Tiancheng Biological Gold Industrial Co., Ltd. | China | On Smelter Look-Up Tab List Only |
| Gold | State Research Institute Center for Physical Sciences and Technology | Lithuania | On Smelter Look-Up Tab List Only |
| Gold | Sudan Gold Refinery | Sudan | On Smelter Look-Up Tab List Only |
| Gold | Tongling Nonferrous Metals Group Co., Ltd. | China | On Smelter Look-Up Tab List Only |
| Gold | Tony Goetz NV | Belgium | On Smelter Look-Up Tab List Only |
| Gold | TOO Tau-Ken-Altyn | Kazakhstan | On Smelter Look-Up Tab List Only |
| Gold | Universal Precious Metals Refining Zambia | Zambia | On Smelter Look-Up Tab List Only |
| Gold | Yunnan Copper Industry Co., Ltd. | China | On Smelter Look-Up Tab List Only |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd. | China | Conformant |
| Tantalum | D Block Metals, LLC | United States of America | Conformant |
| Tantalum | Exotech Inc. | United States of America | Conformant |
| Tantalum | F&X Electro-Materials Ltd. | China | Conformant |
| Tantalum | FIR Metals & Resource Ltd. | China | Conformant |
| Tantalum | Global Advanced Metals Aizu | Japan | Conformant |
| Tantalum | Global Advanced Metals Boyertown | United States of America | Conformant |
| Tantalum | Guangdong Rising Rare Metals-EO Materials Ltd. | China | Conformant |
| Tantalum | Guangdong Zhiyuan New Material Co., Ltd. | China | Conformant |

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| Tantalum | H.C. Starck Co., Ltd. | Thailand | Conformant |
| Tantalum | H.C. Starck Hermsdorf GmbH | Germany | Conformant |
| Tantalum | H.C. Starck Inc. | United States of America | Conformant |
| Tantalum | H.C. Starck Ltd. | Japan | Conformant |
| Tantalum | H.C. Starck Smelting GmbH & Co. KG | Germany | Conformant |
| Tantalum | H.C. Starck Tantalum and Niobium GmbH | Germany | Conformant |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd. | China | Conformant |

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|----------|-------------------------------------------------------------------------------|--------------------------------------------|----------------------------------|
| Tantalum | Jiangxi Dinghai Tantalum & Niobium Co., Ltd. | China | Conformant |
| Tantalum | Jiangxi Tuohong New Raw Material | China | Conformant |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd. | China | Conformant |
| Tantalum | Jiujiang Zhongao Tantalum & Niobium Co., Ltd. | China | Conformant |
| Tantalum | KEMET Blue Metals | Mexico | Conformant |
| Tantalum | Kemet Blue Powder | United States of America | Conformant |
| Tantalum | LSM Brasil S.A. | Brazil | Conformant |
| Tantalum | Metallurgical Products India Pvt., Ltd. | India | Conformant |
| Tantalum | Mineracao Taboca S.A. | Brazil | Conformant |
| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd. | China | Conformant |
| Tantalum | NPM Silmet AS | Estonia | Conformant |
| Tantalum | Power Resources Ltd. | Macedonia, The Former Yugoslav Republic of | Conformant |
| Tantalum | QuantumClean | United States of America | Conformant |
| Tantalum | RFH Tantalum Smeltery Co., Ltd./Yanling Jincheng Tantalum & Niobium Co., Ltd. | China | Conformant |
| Tantalum | Solikamsk Magnesium Works OAO | Russian Federation | Conformant |
| Tantalum | Taki Chemical Co., Ltd. | Japan | Conformant |
| Tantalum | Telex Metals | United States of America | Conformant |
| Tantalum | Ulba Metallurgical Plant JSC | Kazakhstan | Conformant |
| Tantalum | XinXing Haorong Electronic Material Co., Ltd. | China | Conformant |
| Tantalum | Jiujiang Nonferrous Metals Smelting Company Limited | China | On Smelter Look-Up Tab List Only |
| Tin | Alpha | United States of America | Conformant |
| Tin | Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. | China | Conformant |
| Tin | China Tin Group Co., Ltd. | China | Conformant |
| Tin | CV Ayi Jaya | Indonesia | Conformant |
| Tin | CV Dua Sekawan | Indonesia | Conformant |
| Tin | CV Gita Pesona | Indonesia | Conformant |
| Tin | CV United Smelting | Indonesia | Conformant |
| Tin | CV Venus Inti Perkasa | Indonesia | Conformant |
| Tin | EM Vinto | Bolivia (Plurinational State of) | Conformant |
| Tin | Fenix Metals | Poland | Conformant |
| Tin | Gejiu Fengming Metallurgy Chemical Plant | China | Conformant |
| Tin | Gejiu Jinye Mineral Company | China | Conformant |
| Tin | Gejiu Kai Meng Industry and Trade LLC | China | Conformant |

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| Tin | Gejiu Non-Ferrous Metal Processing Co., Ltd. | China | Conformant |
| Tin | Gejiu Yunxin Nonferrous Electrolysis Co., Ltd. | China | Conformant |
| Tin | Guangdong Hanhe Non-Ferrous Metal Co., Ltd. | China | Conformant |

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|-----|------------------------------------------------|----------------------------------|------------|
| Tin | Guanyang Guida Nonferrous Metal Smelting Plant | China | Conformant |
| Tin | HuiChang Hill Tin Industry Co., Ltd. | China | Conformant |
| Tin | Huichang Jinshunda Tin Co., Ltd. | China | Conformant |
| Tin | Jiangxi Ketai Advanced Material Co., Ltd. | China | Conformant |
| Tin | Jiangxi New Nanshan Technology Ltd. | China | Conformant |
| Tin | Magnus Minerais Metais e Ligas Ltda. | Brazil | Conformant |
| Tin | Malaysia Smelting Corporation (MSC) | Malaysia | Conformant |
| Tin | Melt Metais e Ligas S.A. | Brazil | Conformant |
| Tin | Metallic Resources, Inc. | United States of America | Conformant |
| Tin | Metallo Belgium N.V. | Belgium | Conformant |
| Tin | Metallo Spain S.L.U. | Spain | Conformant |
| Tin | Minsur | Peru | Conformant |
| Tin | O.M. Manufacturing (Thailand) Co., Ltd. | Thailand | Conformant |
| Tin | O.M. Manufacturing Philippines, Inc. | Philippines | Conformant |
| Tin | Operaciones Metalurgical S.A. | Bolivia (Plurinational State of) | Conformant |
| Tin | PT Aries Kencana Sejahtera | Indonesia | Conformant |
| Tin | PT Artha Cipta Langgeng | Indonesia | Conformant |
| Tin | PT ATD Makmur Mandiri Jaya | Indonesia | Conformant |
| Tin | PT Babel Inti Perkasa | Indonesia | Conformant |
| Tin | PT Bangka Prima Tin | Indonesia | Conformant |
| Tin | PT Bangka Tin Industry | Indonesia | Conformant |
| Tin | PT Belitung Industri Sejahtera | Indonesia | Conformant |
| Tin | PT Bukit Timah | Indonesia | Conformant |
| Tin | PT DS Jaya Abadi | Indonesia | Conformant |
| Tin | PT Eunindo Usaha Mandiri | Indonesia | Conformant |
| Tin | PT Inti Stania Prima | Indonesia | Conformant |
| Tin | PT Karimun Mining | Indonesia | Conformant |
| Tin | PT Kijang Jaya Mandiri | Indonesia | Conformant |
| Tin | PT Lautan Harmonis Sejahtera | Indonesia | Conformant |
| Tin | PT Menara Cipta Mulia | Indonesia | Conformant |
| Tin | PT Mitra Stania Prima | Indonesia | Conformant |
| Tin | PT Panca Mega Persada | Indonesia | Conformant |
| Tin | PT Premium Tin Indonesia | Indonesia | Conformant |
| Tin | PT Prima Timah Utama | Indonesia | Conformant |
| Tin | PT Rajehan Ariq | Indonesia | Conformant |
| Tin | PT Refined Bangka Tin | Indonesia | Conformant |
| Tin | PT Sariwiguna Binasentosa | Indonesia | Conformant |
| Tin | PT Stanindo Inti Perkasa | Indonesia | Conformant |
| Tin | PT Sukses Inti Makmur | Indonesia | Conformant |
| Tin | PT Sumber Jaya Indah | Indonesia | Conformant |

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|----------|---------------------------------------------------------------------------------------------|------------------------------|----------------------------------|
| Tin | PT Timah (Persero) Tbk Kundur | Indonesia | Conformant |
| Tin | PT Timah (Persero) Tbk Mentok | Indonesia | Conformant |
| Tin | PT Tinindo Inter Nusa | Indonesia | Conformant |
| Tin | PT Tommy Utama | Indonesia | Conformant |
| Tin | Resind Industria e Comercio Ltda. | Brazil | Conformant |
| Tin | Rui Da Hung | Taiwan, Province of China | Conformant |
| Tin | Soft Metais Ltda. | Brazil | Conformant |
| Tin | Thaisarco | Thailand | Conformant |
| Tin | White Solder Metalurgia e Mineracao Ltda. | Brazil | Conformant |
| Tin | Yunnan Chengfeng Non-ferrous Metals Co., Ltd. | China | Conformant |
| Tin | Yunnan Tin Company Limited | China | Conformant |
| Tin | Modeltech Sdn Bhd | Malaysia | Active |
| Tin | An Vinh Joint Stock Mineral Processing Company | Viet Nam | On Smelter Look-Up Tab List Only |
| Tin | CNMC (Guangxi) PGMA Co., Ltd. | China | On Smelter Look-Up Tab List Only |
| Tin | Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company | Viet Nam | On Smelter Look-Up Tab List Only |
| Tin | Estanho de Rondonia S.A. | Brazil | On Smelter Look-Up Tab List Only |
| Tin | Gejiu Zili Mining And Metallurgy Co., Ltd. | China | On Smelter Look-Up Tab List Only |
| Tin | Nghe Tinh Non-Ferrous Metals Joint Stock Company | Viet Nam | On Smelter Look-Up Tab List Only |
| Tin | Super Ligas | Brazil | On Smelter Look-Up Tab List Only |
| Tin | Tuyen Quang Non-Ferrous Metals Joint Stock Company | Viet Nam | On Smelter Look-Up Tab List Only |
| Tungsten | A.L.M.T. TUNGSTEN Corp. | Japan | Conformant |
| Tungsten | ACL Metais Eireli | Brazil | Conformant |
| Tungsten | Asia Tungsten Products Vietnam Ltd. | Viet Nam | Conformant |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd. | China | Conformant |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd. | China | Conformant |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd. | China | Conformant |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd. | China | Conformant |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd. | China | Conformant |
| Tungsten | Ganzhou Seadragon W & Mo Co., Ltd. | China | Conformant |
| Tungsten | Global Tungsten & Powders Corp. | United States of America | Conformant |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd. | China | Conformant |
| Tungsten | H.C. Starck Tungsten GmbH | Germany | Conformant |
| Tungsten | Hunan Chenzhou Mining Co., Ltd. | China | Conformant |
| Tungsten | Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji | China | Conformant |
| Tungsten | Hunan Chunchang Nonferrous Metals Co., Ltd. | China | Conformant |

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|----------|-------------------------------------------------|--------------------|------------|
| Tungsten | Hydrometallurg, JSC | Russian Federation | Conformant |
| Tungsten | Japan New Metals Co., Ltd. | Japan | Conformant |
| Tungsten | Jiangwu H.C. Starck Tungsten Products Co., Ltd. | China | Conformant |
| Tungsten | Jiangxi Gan Bei Tungsten Co., Ltd. | China | Conformant |

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|----------|---------------------------------------------------------------|--------------------------|----------------------------------|
| Tungsten | Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd. | China | Conformant |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd. | China | Conformant |
| Tungsten | Jiangxi Yaosheng Tungsten Co., Ltd. | China | Conformant |
| Tungsten | Kennametal Fallon | United States of America | Conformant |
| Tungsten | Kennametal Huntsville | United States of America | Conformant |
| Tungsten | Malipo Haiyu Tungsten Co., Ltd. | China | Conformant |
| Tungsten | Moliren Ltd. | Russian Federation | Conformant |
| Tungsten | Niagara Refining LLC | United States of America | Conformant |
| Tungsten | Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC | Viet Nam | Conformant |
| Tungsten | Philippine Chuangxin Industrial Co., Inc. | Philippines | Conformant |
| Tungsten | South-East Nonferrous Metal Company Limited of Hengyang City | China | Conformant |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd. | Viet Nam | Conformant |
| Tungsten | Unecha Refractory Metals Plant | Russian Federation | Conformant |
| Tungsten | Vietnam Youngsun Tungsten Industry Co., Ltd. | Viet Nam | Conformant |
| Tungsten | Wolfram Bergbau und Hutten AG | Austria | Conformant |
| Tungsten | Woltech Korea Co., Ltd. | Korea, Republic of | Conformant |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd. | China | Conformant |
| Tungsten | Xiamen Tungsten Co., Ltd. | China | Conformant |
| Tungsten | Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd. | China | Conformant |
| Tungsten | Xinhai Rendan Shaoguan Tungsten Co., Ltd. | China | Conformant |
| Tungsten | Ganzhou Haichuang Tungsten Co., Ltd. | China | On Smelter Look-Up Tab List Only |
| Tungsten | Ganzhou Yatai Tungsten Co., Ltd. | China | On Smelter Look-Up Tab List Only |
| Tungsten | Hunan Litian Tungsten Industry Co., Ltd. | China | On Smelter Look-Up Tab List Only |
| Tungsten | Jiangxi Dayu Longxintai Tungsten Co., Ltd. | China | On Smelter Look-Up Tab List Only |
| Tungsten | Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd. | China | On Smelter Look-Up Tab List Only |

- a) Conformant means that a smelter or refiner was listed as conformant with the RMI's Responsible Minerals Assurance Process's (RMAP) assessment protocols, including through mutual recognition. Smelters and refiners that are listed as Re-audit in process by the RMAP are considered to be Conformant by the RMAP. Included smelters and refiners were not necessarily Conformant for all or part of 2017 and may not continue to be Conformant for any future period.
- b) Active is a RMAP designation that means that the smelter or refiner is a participant in the RMAP and has committed to undergo an audit or is participating in a cross-recognized certification program.

- c) On Smelter Look-up Tab List Only means that a smelter or refiner is listed on the Smelter Look-up tab list of the CMRT, but is not listed as Conformant or Active.

- d) Smelter or refiner status reflected in the table is based solely on information made publicly available by the RMI, without independent verification by SunPower.

- e) Country location is the location of the smelter or refiner and is based solely on information made publicly available by the RMI, without independent verification by SunPower.

Country of Origin Information

SunPower has endeavored to determine the mine or location of origin of the necessary 3TG contained in its in-scope products by requiring that the Suppliers provide it with completed CMRTs and through the other measures described in this Conflict Minerals Report. Where a smelter or refiner has been identified that is not Conformant, SunPower or the Service Provider also has reviewed public information, to the extent available, to try to determine the mine or location of origin of the 3TG processed by the smelter or refiner.

The countries of origin of the 3TG processed by smelters and refiners listed above may have included countries listed below. The countries below are sorted by risk level.

L1 Countries that are not identified as conflict regions or plausible areas of smuggling or export from the Covered Countries: Argentina, Australia, Austria, Benin, Bolivia, Brazil, Burkina Faso, Cambodia, Canada, Chile, China, Colombia, Ecuador, Eritrea, Ethiopia, France, Germany, Ghana, Guatemala, Guinea, Guyana, Honduras, India, Indonesia, Japan, Kazakhstan, Laos, Madagascar, Malaysia, Mali, Mexico, Mongolia, Myanmar, Namibia, Nicaragua, Nigeria, Panama, Peru, Portugal, Russia, Senegal, Sierra Leone, Spain, Thailand, Togo, United Kingdom, United States of America, Uzbekistan, Vietnam and Zimbabwe.

L2 - Countries that are known or plausible countries for smuggling, export out of region or transit of materials containing 3TG: Mozambique and South Africa.

L3 - The DRC and its adjoining countries: Burundi, Rwanda and Uganda.

DRC - Democratic Republic of the Congo.

Some of the 3TG processed by the identified smelters and refiners may have originated in whole or in part from recycled or scrap sources.

Due Diligence Improvement Measures

SunPower intends to further improve its due diligence measures for 2018 in order to mitigate the risk that the necessary 3TG in its in-scope products benefit armed groups by taking the following steps, among others:

Continue to alert suppliers when SunPower obtains information that a 3TG smelter or refiner is believed to be irresponsibly sourcing 3TG.

Request that suppliers who have identified non-Conformant or high-risk smelters require their upstream suppliers to find alternative sources of 3TG or require certification of the smelters and refiners in their supply chains.

Include 3TG compliance in quarterly business reviews with suppliers.
The foregoing steps are in addition to the steps that SunPower took for 2017.