

KAUTEX TEXTRON GMBH & CO. KG.

Conflict Minerals Policy Statement

Background

In 2012, the U.S. Securities and Exchange Commission adopted rules pursuant to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act which established disclosure requirements related to certain minerals originating from mines in the Democratic Republic of the Congo or adjoining countries (“Covered Countries”). These rules require publicly-traded companies to report annually on the source and chain of custody of gold, tin, tantalum and tungsten (“3TG”) in products manufactured by the company.

Policy Statement

Kautex is committed to the responsible sourcing of 3TG throughout our global supply chain and to compliance with the conflict minerals rules. Because kautex has no direct relationships with mines, smelters or refiners of 3TGs, we rely on our direct suppliers to provide information on the origin of the 3TGs contained in components and materials supplied to us by them – including sources of 3TGs that are supplied to them from lower tier suppliers.

Kautex has established a conflict minerals compliance program that is designed to conform to the Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. This program includes a number of elements, including:

- Conduct a reasonable country of origin inquiry with our global supply base through a software platform using the Electronic Industry Citizenship Coalition and Global e-Sustainability Initiative Conflict Minerals Reporting Template and review supplier responses to determine which require further engagement with suppliers;
- Communicate to our suppliers our obligations under the conflict minerals rule, directing them to training resources to attempt to increase the response rate and improve the content of the supplier survey responses;
- Encourage our suppliers to undertake reasonable due diligence with their supply chains in an effort to assure their conflict minerals are being sourced from mines and smelters/refiners which have been certified by an independent third party as “conflict free” if sourced within the Covered Countries. If we determine that any of our products or components contain 3TG from a mine or facility in a Covered Country that is not “conflict free”, we will evaluate our options, including but not limited to reassessment of the supplier relationship.