

AxleTech (AT) Conflict Minerals Policy Statement

“Conflict Minerals” refers to Cassiterite (**Tin**), Columbite-tantalite (**Tantalum**), Wolframite (**Tungsten**) and **Gold**, and their derivatives, mined in “Covered Countries”. These include Democratic Republic of Congo (DRC), and the adjoining countries (Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia). Revenues from the extraction and processing may be directly, or indirectly, financing armed groups engaged in civil war resulting in serious social and environmental abuse in “Covered Countries”.

In 2012, the U.S. Securities and Exchange Commission (SEC) published regulations implementing Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act governing “Conflict Minerals”. These regulations require companies to perform due diligence on the source, and chain of custody, of “Conflict Minerals” contained in their products.

As a privately held entity, AT is not subject to the SEC “Conflict Minerals” rule. Nor does AT directly purchase raw “Conflict Minerals” from any source, and is many levels removed from the mines, smelters and refiners that produce the metals used in the products we manufacture. However, AT is committed to fulfilling the legal requirements of the conflict minerals rule, the humanitarian goals of the Dodd-Frank Act, and the responsible sourcing of minerals through our global supply chain. AT has implemented a due diligent process.

Because AT does not source conflict minerals directly from smelters or refiners and has a multi-tiered, complex and geographically dispersed supply chain, engagement with our suppliers is a fundamental element in our efforts to comply with the legislation. In turn, AT requires its suppliers to comply with the conflict minerals rule and to support AT in fulfilling its obligations under the rule, including providing AT with information regarding the country of origin of the conflict minerals that it provides to AT.

Annual Conflict Mineral reporting requirements will be communicated directly to AT suppliers.

Suppliers who do not comply with AT’s policy will be reviewed by AT’s Purchasing organization in order to determine if the supplier must take any remedial steps. We will attempt to work with the supplier concerned to correct the situation. If a supplier remains non-compliant, we will evaluate our options, including but not limited to, reassessment of the supplier relationship.

Please direct questions to: conflictminerals@axletech.com .

For more information on Conflict Minerals, click on:

[Conflict-Free Sourcing](#)

[SEC Fact Sheet](#)