	Finance, Governance, Risk and Compliance – Governance		
	<b>Conflict Minerals Policy</b>		
INTERNAL	DL-04-PY-017-ENG	Rev A	1   2

Revision	Date	Modification notes
A	17.05.2021	First Issue

Document Approval
Document approved through electronic system in Windchill (DES Library) by all relevant functions. Document Owner is visible in the DES Portal.

## 1.0 Purpose

This document sets out GKN Automotive’s policy on the use of Conflict Minerals in its supply chain, and our expectations of our Suppliers in respect of the due diligence steps and related reporting to GKN Automotive in connection with materials which may contain Conflict Minerals.

## 2.0 Scope & Responsibility

This policy applies to all GKN Automotive plants, offices and other locations worldwide. All GKN Automotive Employees are responsible for observing and complying with this policy and for avoiding any activity that might lead to, result in, or suggest a breach of this policy. The General Counsel is responsible for reviewing and updating this policy when appropriate.

## 3.0 Policy

### 3.1 What are Conflict Minerals?

For the purposes of this policy, “**Conflict Minerals**” are Cassiterite (Tin), Coltan (Tantalum), Wolframite (Tungsten) and Gold (or derivatives of these minerals) (collectively referred to as “**3TG**”) which are mined in the Democratic Republic of Congo (“**DRC**”) or an adjoining country (Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia), and which directly or indirectly finance or benefit armed groups in the DRC or any adjoining country.


### 3.2 Policy Statement

GKN Automotive is committed to conducting business with integrity and in a responsible, ethical and sustainable manner. This applies both to our business operations and to our global supply chain. Consistent with this commitment, it is our policy to adopt procedures, to the extent required by applicable laws or customer expectations, to seek to identify whether 3TG used in our products constitute Conflict Minerals, taking a risk-based approach.

### 3.3 Supplier Expectations

We expect our Suppliers to operate their businesses in a way that supports our commitment to acting ethically and responsibly.

Our policy on ethical sourcing and avoiding the use of Conflict Minerals should be communicated to all Suppliers at the outset of our business relationship with them and reinforced as appropriate thereafter. This should be done by providing our Suppliers with a copy of our Supplier Code of Conduct ([www.gknautomotive.com/SupplierCodeOfConduct](http://www.gknautomotive.com/SupplierCodeOfConduct)), as required by our **Supplier Due Diligence Procedure** (DL-04-PR-003).

	Finance, Governance, Risk and Compliance – Governance <b>Conflict Minerals Policy</b>		
	INTERNAL	DL-04-PY-017-ENG	Rev A

In addition, compliance with our Supplier Code of Conduct should be a term of our contract with all Suppliers. This can be done by contracting using our General Purchasing Conditions ([www.gknautomotive.com/GeneralPurchasingConditions](http://www.gknautomotive.com/GeneralPurchasingConditions)) or our standard template purchasing agreements available on DES.

Any Supplier who is unwilling to agree to comply with the basic principles of our Supplier Code of Conduct should not be dealt with.

Where GKN Automotive sources products or raw materials containing 3TG we shall, to the extent required by applicable laws or customer expectations, work with our supply chain partners to ensure compliance with all applicable laws and regulations and seek to identify whether such 3TG products or materials constitute Conflict Minerals, taking a risk-based approach. As a minimum, relevant suppliers will then be required to: (a) perform due diligence to ascertain whether any 3TG products or materials constitute Conflict Minerals; and (b) complete a Conflict Minerals reporting template.

**3.4 Reporting Concerns**

All GKN Automotive Employees must raise any concerns about any actual or suspected breaches of this policy at the earliest possible stage. This should be done by contacting the General Counsel, any member of the Legal Function or otherwise in accordance with the processes set out in our **Whistleblowing & Employee Disclosure Policy** (DL-04-PY-004).

**4.0 Definitions**

“**Conflict Minerals**” has the meaning set out in paragraph 3.1 above.

“**GKN Automotive Employee**” means all employees or workers within GKN Automotive, which includes full time and part time employees and other workers including contractors, agency workers, interns, apprentices and volunteers.

“**Supplier**” means the any supplier of goods and/or services to GKN Automotive.

**5.0 Records/ Logs**

n/a

**6.0 References**

Supplier Due Diligence Procedure (DL-04-PR-003).

Whistleblowing & Employee Disclosure Policy (DL-04-PY-004)