



CONFLICT MINERALS POLICY

CONFLICTS MINERALS AND “COVERED COUNTRIES”

Companies, Governments* and Civil Society organizations are paying increased attention to certain “Conflicts Minerals” and their derivatives, sourced from the called “Covered Countries”. The extraction and trade in these “Conflict Materials” contribute financially to violence. CIE Automotive and its suppliers must fulfil the regulations about the use of these conflict minerals sourced in the “Covered Countries” and neighbouring countries (Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, Sudan, Tanzania, Uganda and Zambia).

The Regulation requires that companies should make appropriate inquiries, and, depending on the circumstances, conduct the due diligence necessary to determine the origin and chain of custody of any conflict minerals that may be used in their products.

*See “Dodd-Frank Wall Street Reform and Consumer Protection Act Section 1502” for American companies. And for European companies: “EU Regulation 2017/821”, approved in 2017, valid from January 1, 2021. New European Regulation, has the same Minerals in scope and very much aligned to the US Dodd-Frank Act aforementioned.

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- CIE Automotive recognizes the importance of responsible sourcing and commits its efforts in adhering to international regulations in this topic.
- CIE Automotive is permanently committed to caring for the sustainable development. This commitment is clearly aligned with the 17 sustainable development Goals of United Nations as well as with the United Nations Global Compact, (in October 2015 CIE Automotive joined this compact), to, according our management model, develop, implement and so disseminate policies and practices of business sustainability.
- CIE Automotive’s providers and Supply Chain must fulfil the requirements included in CIE’s “Global Supply Chain Manual” (see the “Conflict Minerals” section of the aforementioned Manual), and they must also respect human rights, labour laws, and environmental and ethical requirements in accordance with the principles of the global compacts, goals and CIE Automotive’s Code of Conduct and General Purchasing Conditions in each geographical area.
- The breach of this regulation involves, in first term status as “Global Business Hold” and the removal as supplier for CIE Automotive, if after an agreed period the situation is not solved satisfactorily.
- No new suppliers will be accepted in our Suppliers Panel, if they cannot guaranty the fulfillment of the related requirements.
- CIE Automotive expects from its suppliers, to implement similar measures, to extend them to their supply chains
- The Policy affects all CIE Automotive Group companies (CIE Automotive S.A. and its subsidiaries).



CIE Automotive's COMMITMENT

In order to ensure that it does not use materials or components from dubious sources, CIE Automotive undertakes to:

- Adopt and enforce this Conflict Minerals Policy in all Group companies.
- Extend this Policy to its supply chain.
- Implement through the **Supplier's Portal** an inquiry process aimed at requesting information on Conflict Minerals from suppliers who may be affected by this Policy using the Conflict-Free Sourcing Initiative. By procedure, CIE Automotive will not validate questionnaires in which the supplier claims to use any of the Conflict Minerals, and does not guarantee that they come from the "Covered Countries". These reports will be available periodically or when required by an interest group.

REFERENCES

www.cieautomotive.com/suppliers
<https://supplychain.cieautomotive.com/Home/Login>
www.oecdwatch.org/oecd-guidelines?set_language=en
www.un.org/en/development/devagenda/sustainable.shtml
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www.unglobalcompact.org/what-is-gc/mission/principles
www.cieautomotive.com/en/web/quest/related-documents