



# Martinrea International Inc.



## CONFLICT MATERIALS POLICY

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## 1. Guidelines

### 1.1. Introduction

This Conflict Material Policy (the “Policy”) provides a general overview of our commitment to ethical and socially responsible business practices and recognizes its responsibility in promoting the protection of human rights. Martinrea is dedicated to conflict mineral reporting to ensure that conflict minerals such as gold, tantalum, tungsten and tin, as well as cobalt and mica, which can be sourced from mines under the control of armed groups in the Democratic Republic of Congo and certain neighbouring countries, are not used in automotive parts and assemblies.

### 1.2. Applicability

This policy applies to Martinrea International Inc., its operating divisions, subsidiaries and sponsored joint ventures (collectively, “Martinrea” or the “Company”). We also expect our suppliers or any other company that we work with to act ethically in support of this humanitarian goal to end human rights violations and comply with the law. Martinrea expects its suppliers to adhere to the Supplier Code of Conduct and the Company’s Human Rights policy, in addition to this Policy. We require our direct suppliers to:

- (i) Comply with applicable laws and rely on our suppliers to adopt adequate due diligence measures to determine origins of minerals used in products supplied to Martinrea;
- (ii) Implement policies and management systems to support compliance with our expectations and in turn require their upstream suppliers to adopt similar policies and systems; and
- (iii) Promptly, completely, and accurately provide Martinrea the necessary information directly or from their suppliers with respect to the origin of minerals used in products supplied to Martinrea.

## 2. Policy

This Policy plays an important role in Martinrea’s commitment to source components and materials from companies that act in an ethical and environmentally responsible manner, respecting human rights.

Martinrea strives to have a conflict-free supply chain and is committed to working with its suppliers to increase transparency regarding the origin of minerals contained in its products. Suppliers we determine to be “high risk potential” will be audited by Martinrea to reduce risk within the supply chain.

## 3. Due Diligence and Reporting

### 3.1. Due Diligence

Failure to meet our standards detailed within the Supplier Code of Conduct which includes this Policy may result in the termination by Martinrea of the supply relationship. This not only reduces our liability as a Company, it also sets the precedent of our expectations and how seriously we take our position on ethical standards.

We report annually on supply chain due diligence and use our International Materials Data System (IMDS) and the Responsible Minerals Initiative (RMI) to perform due diligence queries of our supply chain. For more information please see the Conflict Minerals Reporting Template (“CMRT”) & Cobalt Reporting Template (“CRT”) Reporting tools and Guidelines are available at: <http://www.responsiblemineralsinitiative.org/minerals-due-diligence/>

### 3.2. How to report to Martinrea

Our employees, suppliers and other parties can report concerns and alleged violations of this Policy by sending an email to: [conflict.minerals@martinrea.com](mailto:conflict.minerals@martinrea.com)

Reports can be made anonymously and will be kept confidential to the fullest extent practicable and allowed by law. We will not take any retaliatory action against our employees, suppliers, or other parties who make a report in good faith.

## 4. Contact information

For further information, please contact the General Counsel and Corporate Secretary at 416-749-0314.

## **Martinrea International Inc.**

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