



Conflict Minerals Policy Statement

American Axle & Manufacturing Holdings, Inc. (AAM) is committed to responsible sourcing, especially as it pertains to conflict minerals and compliance with Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act¹ (Dodd-Frank Act) and the Regulation (EU) 2017/821 of the European Parliament². Furthermore, AAM supports the goal of ending violence and human rights violations globally, including the Democratic Republic of Congo (DRC) and Covered Countries, and all conflict-affected and high-risk areas (CAHRAs).

AAM is a global Tier-1 supplier to the automotive industry with an international value chain. AAM manufactures driveline and metal formed products, among other, related items. As such, AAM has implemented a compliance and responsible minerals sourcing program designed in conformance with the internationally recognized OECD Due Diligence Guidance³.

On an annual basis, this program includes, but is not limited to:

- supplier engagement and education
- supply chain risk identification, assessment, mitigation, and remediation
- conducting a reasonable country of origin inquiry (RCOI)
- annual reporting, free and available to the public

AAM's responsible sourcing commitment is also manifested through its membership in industry, and cross-industry groups, such as the [Automotive Industry Action Group](#) (AIAG) and the [Responsible Minerals Initiative](#) (RMI).

For more information regarding AAM's compliance information, please visit our [website](https://www.aam.com/suppliers/doing-business-with-aam/conflict-minerals) at <https://www.aam.com/suppliers/doing-business-with-aam/conflict-minerals>.

AAM's global conflict minerals grievance mechanism is available by email at conflictminerals@aam.com.

¹ Reference to the Dodd-Frank Act includes the corresponding 17 CFR § 240.13p-1

² Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas

³ OECD. (2016). OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition. Paris: OECD Publishing.