



Conflict Minerals Policy Statement

American Axle & Manufacturing Holdings, Inc. (AAM) is committed to responsible sourcing, especially as it pertains to conflict minerals—tin, tantalum, tungsten, and gold (commonly known as 3TG) and compliance with Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act¹ (Dodd-Frank Act), the Regulation (EU) 2017/821 of the European Parliament² and EU Battery Regulation³. Furthermore, AAM supports the goal of ending violence and human rights violations globally, including the Democratic Republic of Congo (DRC) and Adjoining Countries, and all conflict-affected and high-risk areas (CAHRAs).

This policy statement applies to all AAM operations, subsidiaries, and their global supply chains.

Program Overview

As a global Tier-1 automotive supplier, AAM manufactures driveline and metal-formed products and maintains an international value chain. To ensure responsible sourcing, AAM has implemented a compliance program designed in conformance with the OECD Due Diligence Guidance.⁴

This program promotes transparency, supports ethical supply chains, and meets applicable regulatory requirements. On an annual basis, it includes, but is not limited to:

- Supplier engagement and education
- Supply chain risk identification, assessment, mitigation, and remediation
- Reasonable Country of Origin Inquiry (RCOI)
- Annual public reporting in line with SEC requirements
- Membership and active participation in industry, and cross-industry groups, such as [the Automotive Industry Action Group](#) (AIAG) and the [Responsible Minerals Initiative](#) (RMI).

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 Regulation (EU) 2023/1542 of the European Parliament and of the Council of 12 July 2023 establishing sustainability, safety, labelling, and due diligence requirements for batteries and waste batteries, including obligations on the responsible sourcing of cobalt, lithium, nickel, and natural graphite originating from conflict-affected and high-risk areas.

⁴ OECD. (2016). OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition. Paris: OECD Publishing.



Supplier Requirements

AAM expects direct material suppliers whose products or services may contain or contribute to the use 3TG to:

1. Comply with the AAM Supplier Code of Conduct, Supplier Requirements Manual and this Policy Statement.
2. Responsibly source raw materials and minerals used in their products by developing a management system that promotes supply chain traceability and transparency.
3. Implement due diligence measures in accordance with OECD Due Diligence Guidance.
4. Survey their own tiered supply base and respond to AAM's annual conflict minerals surveys by submitting a Conflict Minerals Reporting Template (CMRT) developed by RMI. The CMRT must include list of smelters and refiners, as well as disclose the location of mines for all 3TG necessary to the functionality or production of components or assemblies supplied to AAM.
5. Use only smelters and refiners that are conformant with the RMI's Responsible Minerals Assurance Process (RMAP) or an equivalent internationally recognized standard.
6. Extend due diligence efforts to sub-tier suppliers to ensure traceability and transparency throughout the supply chain.

In addition, certain suppliers may be requested to complete the Extended Minerals Reporting Template (EMRT) developed by the RMI, as part of AAM's broader due diligence efforts.

Suppliers whose products or services do not involve 3TG or other designated minerals may be asked to confirm this status upon request.

Non-Compliance Mitigation

If a supplier is unable to meet reporting expectations or align with responsible sourcing practices AAM will seek to address the issue through direct communication or clarification of requirements. Unresolved non-compliance may negatively affect the supplier's relationship with AAM.

Transparency and Grievance Mechanism

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

AAM provides a global conflict minerals grievance mechanism, accessible via email at conflictminerals@aam.com or through the AAM Business Ethics Line. Reports may be made anonymously where permitted by local law. AAM's Supplier Code of Conduct prohibits retaliation against anyone who reports a suspected issue in good faith.

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