1.0 PURPOSE

1.1 Disclosing the use of Conflict Minerals:

In 2010, Congress passed the Dodd-Frank Act, which directs the Commission to issue rules requiring certain companies to disclose their use of conflict minerals if those minerals are “necessary to the functionality or production of a product” manufactured by those companies. Under the Act, those minerals include tantalum, tin, gold or tungsten.

Congress enacted Section 1502 of the Act because of concerns that the exploitation and trade of conflict minerals by armed groups is helping to finance conflict in the DRC region and is contributing to an emergency humanitarian crisis.

2.0 SCOPE

2.1 Personnel within the organization shall be familiar with identifying conflict minerals and be responsible to eliminate conflict minerals during new Product Development programs and in the Change Management process of established product.

3.0 POLICY/GUIDELINES

3.1 Kansas City Design Review Guidance (Checklist) – Document No.: HDX1-447-103

4.0 RESPONSIBILITIES

4.1 It is the responsibility of Product Development, Sourcing, Logistics, Accounting, Sales and Quality

Departments to be familiar and act in response to the use of conflict minerals.

The Product Development team shall coordinate design reviews with cross functional disciples related to new development projects and use the Design Review Guidance (Checklist); Document No.: HDX1-447-103 for the U.S. and Document No.: HDX1-88-863 for the EU to identify conflict minerals.

During the Production Part Approval Process (PPAP), the Supplier Quality Assurance (SQA) Department team shall verify with the supplier that all relevant conflict mineral documentation has been submitted and approved by the Haldex GTC department, Document No: HDX4-51-126 and indicate in the “Comments” section on the Part Submission Warrant (PSW) Document No.: HDX4-51-96 per Records of Compliance.

The Sourcing team shall communicate to suppliers the use of conflict minerals is prohibited as per the Haldex General Purchase Conditions document No.: HDX4-51-137
5.0 DEFINITIONS

5.1 Conflict Minerals: Minerals identified by the Dodd-Frank Act (2010) that are concerns for exploitation and trade by armed forces in the DRC region to help finance conflict.

6.0 REFERENCES