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**GKN AEROSPACE**

**CONFLICT MINERALS SUMMARY**

**POLICY**

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**1. POLICY STATEMENT**

- 1.1 GKN Aerospace operates a Conflict Minerals Policy (“the **Conflict Minerals Policy**”) which details its expectations of its suppliers with regards to minerals which may originate from territories where there are conflicts or are used to fund armed conflict. GKN Aerospace’s policy is to ensure that “3TG” minerals are sourced responsibly and from conflict-free regions
- 1.2 This Summary Policy is a summary of the key provisions of the Conflict Mineral Policy.

**2. APPLICATION**

- 2.1 The Summary Policy and the Conflict Minerals Policy apply to all individuals working at all levels of GKN Aerospace, including officers, directors, senior managers, employees (whether permanent, fixed-term, or temporary), contractors, trainees, casual workers/agency staff, or any other person working for GKN Aerospace throughout the world (collectively referred to as “**Company Employees**”).
- 2.2 GKN Aerospace expects its Suppliers and persons, companies or entities with whom we enter into a joint venture, consortium or similar relationship (referred to as “**Relevant Joint Venture Partners**”) to comply with the Conflicts Mineral Policy and the Summary Policy.

**3. WHAT ARE CONFLICT MINERALS?**

- 3.1 The EU, US and elsewhere have rules governing trade in four minerals – tin, tantalum, tungsten and gold (known as “3TG”) – as sometimes 3TG minerals are used to finance armed conflict or are mined using forced labour. The mining of these minerals in conflict zones can also cause unacceptable environmental degradation.

**4. SUPPLIERS**

- 4.1 In accordance with the Conflict Minerals Policy, when sourcing products or raw materials containing 3TG, GKN Aerospace will work with its suppliers to ensure compliance with all applicable laws and regulations and ensure that all 3TG materials sourced by GKN Aerospace are considered 3TG Conflict Free. As a minimum, relevant suppliers are required to:
  - 4.1.1 perform due diligence to ascertain the point of origin of 3TG minerals in their products;
  - 4.1.2 complete the Responsible Minerals Initiative reporting template or equivalent, as required by GKN Aerospace.
  - 4.1.3 ensure that their respective suppliers are complying with applicable laws;
  - 4.1.4 request that their next tier suppliers perform due diligence;
  - 4.1.5 obtain raw materials from audited sources as a matter of principle wherever possible, using independent, third-party assurance;
  - 4.1.6 disclose their supply chain upon request to GKN Aerospace;
  - 4.1.7 give their consent to audits that may be performed by GKN Aerospace (or third parties acting on behalf or for GKN Aerospace).

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4.1.8 ensure that all certification and documentation provided to GKN Aerospace is complete, accurate, true and free of rights of any third-party and may be used by GKN Aerospace for any kind of reporting it deems necessary.

## 5. CONSEQUENCES OF NON-COMPLIANCE

5.1 GKN Aerospace will take appropriate disciplinary action, up to and including termination of employment, against any Company Employee who fails to comply with the Conflict Minerals Policy and this Summary Policy.

5.2 GKN Aerospace may cease to continue working with any Supplier or Joint Venture Partner who fails to comply with the Conflicts Minerals Policy and this Summary Policy.

5.3 In addition, any person who breaks the law may be reported to the police and/or relevant authorities and may face criminal proceedings, fines or imprisonment.

## 6. HOW TO RAISE A CONCERN

6.1 If a Company Employee suspects that the Conflict Minerals Policy or this Summary Policy has been breached, they should speak to their line manager, or Head of Legal.

6.2 Company Employees can also make a disclosure through the GKN Aerospace Disclosure Hotline.

6.3 Suppliers and third parties should speak to their GKN Aerospace contact or the General Counsel of GKN Aerospace; or email: [speaking.up@gknaerospace.com](mailto:speaking.up@gknaerospace.com).

6.4 GKN Aerospace encourages openness and will support anyone who raises genuine concerns, even if they turn out to be mistaken. All concerns will be investigated. GKN Aerospace is committed to ensuring that no Company Employee suffers any detrimental treatment as a result of raising a concern.

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