



# Conflict Minerals Policy Statement

## INTRODUCTION

In the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, the U.S. Congress directed the U.S. Securities and Exchange Commission (SEC) to adopt rules addressing the mining of certain so-called "conflict minerals" from the Democratic Republic of the Congo (DRC) and surrounding countries (the "Covered Countries") that are used to support armed groups engaged in violence and human rights violations. These SEC rules require companies who file reports with the SEC to annually disclose due diligence measures taken to determine whether the products they manufacture or contract to manufacture contain "conflict minerals" that are "necessary to the functionality or production" of those products. Adient plc and its affiliated entities (Adient) are committed to complying with the SEC's conflict minerals disclosure rules.

## SCOPE

This Conflict Minerals Policy Statement applies to Adient's global business operations. Employees whose responsibilities relate to the sourcing of parts, components, and materials are informed and are expected to assist with our compliance with these requirements, as well as any associated legislation and regulations. This policy is reviewed annually and changes are incorporated accordingly.

## DEFINITIONS

The term "conflict minerals" refers to gold, tin, tantalum, and tungsten, as well as the derivatives of cassiterite, columbite-tantalite, and wolframite, regardless of where they are sourced, processed, or sold. The U.S. Secretary of State may designate other minerals in the future if he or she determines that such minerals are financing armed conflict in the Covered Countries.

In addition to the DRC, the term "Covered Countries" currently include Angola, Burundi, the Central African Republic, the Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

## OUR COMMITMENT

Adient supports the humanitarian goal of ending armed conflict in the Covered Countries. We are committed to conducting our worldwide business operations in a manner that complies with applicable laws and regulations, and to the responsible sourcing of Conflict Minerals throughout our supply chain. Adient is a member of the Responsible Minerals Initiative (RMI) and we compare the aggregation of smelter lists provided by our third-party suppliers with the RMI list of compliant smelters to determine which smelters are RMI certified. We use the information provided by our third-party suppliers to conduct due diligence and assess their Conflict Minerals reports for completeness and consistency. Our due diligence processes also conform to the primary principles of the internationally recognized due diligence framework for Conflict Minerals compliance published by the Organization for Economic Co-operation and Development (OECD).

## OUR EXPECTATIONS

Adient has a multi-tiered, complex, and geographically dispersed supply chain. Engagement with our suppliers in this environment requires focused efforts to comply with the SEC's conflict minerals disclosure rules. With those challenges in mind, we continue to promote and encourage our third-party suppliers to use responsible sourcing practices and source conflict-free materials from RMI certified smelters. We expect our third-party suppliers to conduct due diligence on their respective supply chains and to assist us in complying with all applicable Conflict Minerals rules and requirements.

To the extent that a supplier refuses to cooperate with Adient's compliance efforts or does not conduct conflict-free sourcing from RMI certified smelters, we reserve the right to reconsider our supply arrangement and implement remedies available to us.

Likewise, as a supplier, Adient is also committed to assisting its customers in fulfilling their legal obligations under the SEC's conflict minerals rules. We leverage the processes and systems we established to support our own compliance to provide our customers with appropriate information to assist with their compliance efforts.

Sincerely,



Douglas G. Del Grosso  
President and Chief Executive Officer