

## AMPCO METAL Conflict minerals policy

AMPCO METAL's core values and culture reflect a commitment to ethical business practices and good corporate citizenship wherever we operate in the world. As a company, we acknowledge and respect the fundamental principles contained in the Universal Declaration of Human Rights, and our policies and practices reflect our commitment to promote human rights within the company's sphere of influence.

We source components and assemblies for our products from suppliers in different countries around the world, each with its own laws and regulations. We are committed to respecting human rights throughout our global supply chain and do not knowingly conduct business with any individual or company that participates in the exploitation of children (including child labor), physical punishment, forced labor or human trafficking.

AMPCO METAL supports the goal of ending violence, human rights violations and environmental devastation in the Democratic Republic of the Congo ("DRC") or adjoining countries ("Covered Countries"). We are committed to complying with the requirements applicable to AMPCO METAL under Section 1502 of the Dodd-Frank Act ("the Act"). AMPCO METAL is committed to sourcing components and materials from organizations that share our values around human rights, ethics and environmental responsibility. To achieve this, AMPCO METAL does:

- Comply with our annual disclosure requirements under the Act.
- Provide our Supplier Code of Conduct to help our suppliers understand our commitment to complying with all requirements to the Conflict Minerals Rule.
- Train our Procurement Employees on our obligations with respect to the Conflict Minerals Rule.
- Expect our suppliers to supply materials to AMPCO METAL that are "DRC Conflict-Free" and to adopt policies and management systems with respect to conflict minerals to ensure Conflict-Free supply chains.
- Routinely request our direct material suppliers to submit a report consistent with the Responsible Minerals Initiative Conflict Minerals Reporting Template and review their submissions against conformance to the Responsible Minerals Initiative.
- In the event AMPCO METAL determines that a supplier's efforts to comply with AMPCO METAL's expectations have been deficient and the supplier fails to cooperate in developing and implementing reasonable remedial steps, AMPCO METAL reserves the right to take appropriate actions up to and including discontinuing purchases from the supplier.

Questions on AMPCO METAL's conflict minerals program may be directed to [conflictmineral\\_inquiry@ampcometal.com](mailto:conflictmineral_inquiry@ampcometal.com)