



## RESPONSIBLE MINERALS POLICY STATEMENT

### Our Commitment

Cooper Standard is committed to ethical and socially responsible business practices and recognizes its responsibility in promoting the protection of human rights. Through our support of responsible mineral sourcing initiatives, our goal is to ensure that the materials and components used in the products that we buy and the products that we manufacture do not support or fund the inhumane treatment of workers or contribute to the environmental degradation associated with the mining of “Conflict Minerals”<sup>1</sup>, regardless of where they are sourced, processed or sold. We recognize that our sourcing decisions may cause economic consequences in impacted regions and seek to avoid inadvertent adverse economic impact attributable to conflict mineral due diligence activities. Our goal is to use conflict-free minerals while continuing to support responsible in-region mineral sourcing from conflict-affected and high-risk areas.

### Our Actions

Cooper Standard has implemented a compliance and responsible minerals sourcing program designed in conformance with the internationally recognized OECD Due Diligence Guidance<sup>2</sup>, including:

- To the extent that our products contain Conflict Minerals that are necessary to their functionality or production that are sourced from the Democratic Republic of the Congo (“DRC”) or an adjoining country (collectively, “Covered Countries”), we comply with the [reporting and disclosure requirements](#) currently applicable to Conflict Minerals<sup>3</sup>;
- Establishing a Responsible Minerals Oversight Committee to design, implement, and oversee our program, adopt a reasonable country of origin inquiry (RCOI) and due diligence guidelines, and otherwise identify, assess, and respond to risk in our supply chain;
- Working with suppliers to encourage responsible sourcing;
- Adopting a Company [Code of Conduct](#), [Policy on Global Human Rights](#), Supplier Code of Conduct and global terms and conditions of purchase incorporating Company and supplier obligations related to Responsible Minerals management
- Collaborating with Industry Groups by actively supporting:
  - the Responsible Minerals Initiative (RMI) as a paid member, allowing us access to RCOI, smelter validation data, and other resources we use to enhance our program;
  - RMI’s Smelter Engagement Team and its ITRI Tin Supply Chain Initiative program;
  - the Automotive Industry Action Group as a contributing member of its Responsible Minerals Work Group;

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1 Tin, tantalum, tungsten and gold (3TG) – in addition to other minerals of concern, such as cobalt and mica

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

3 Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (the “Dodd-Frank Act”) and Rule 13p-1 of the Securities Exchange Act of 1934

- the Manufacturers Alliance for Productivity and Innovation, as a participant in its Sustainability Council.

### **Our Expectations of Suppliers**

Cooper Standard is committed to sourcing components and materials from companies that share our values and commitment to human rights, ethics and environmental responsibility. We require our direct suppliers to:

- Engage in responsible supply chain practices, comply with our [Supplier Code of Conduct](#) (“Code”), and hold their supply chain to the same standards contained in this Code;
- Undertake reasonable due diligence with their supply chains to assure that Conflict Minerals are being sourced from mines and smelters outside the Covered Countries or, if sourced within the Covered Countries, from mines and smelters that have been certified by an independent third party as DRC conflict free.<sup>4</sup> To the extent any supplier does not currently have this capability, such a supplier is required to disclose its future plans to do so;
- Be able to disclose supply chain mapping back to the primary origin associated with the products or services provided to our Company which contain any Conflict Mineral; and
- Create internal programs, processes and procedures for handling reports of workplace grievances, and promptly report actual or suspected violations of law or our Code to Cooper Standard, either anonymously through our independent third-party service or via our other reporting resources. We reserve the right to terminate any supplier who cannot or will not demonstrate compliance with our Code.

We recognize that human rights issues are not limited to the Covered Countries and that other areas where we source could be at-risk or may become at-risk with time. Accordingly, we will continue to promote transparency in our supply chain regarding mineral sourcing and evaluate our policies and procedures against emerging legislation around the world.

Sincerely,

/s/ Jeffrey S. Edwards

Jeffrey S. Edwards  
Chairman and CEO

This Policy Statement will be regularly reviewed, updated as necessary, and is available on our Company website for reference by our customers, suppliers and other stakeholders.

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<sup>4</sup> “DRC conflict free” is defined in Section 1502(p)(1)(A)(ii) of the Dodd-Frank Act to mean the products that do not contain minerals that directly or indirectly finance or benefit armed groups in the Conflict Region