



## **Conflict Minerals Policy Statement**

### **Introduction**

“Conflict Minerals” refers to Gold, Casserite (Tin), Columbite-tantalite (Tantalum), and Wolframite (Tungsten) or their derivatives mined in “Covered Countries”, which include the Democratic Republic of Congo (DRC) and in the adjoining countries (Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia). They are referred to as “Conflict Minerals” because revenues arising from their extraction and processing may be directly or indirectly financing armed groups engaged in civil war resulting in serious social and environmental abuse in the Covered Countries. In 2010, the U.S. Congress passed the Dodd-Frank Wall Street Reform and Consumer Protection Act, pursuant to which the U.S. Securities and Exchange Commission (SEC) issued rules requiring publicly listed companies in the United States to make disclosures under specific circumstances concerning the use of “Conflict Minerals”.

### **Overview**

Accuride Corporation (“Accuride” or the “Company”) fully supports the humanitarian goals of the Dodd-Frank Act. As a manufacturer of steel wheels, aluminum wheels, and wheel-end components for the commercial vehicle industry, Accuride does not directly purchase raw Conflict Minerals from any source and is many levels removed from the mines, smelters and refiners that produce the metals used in the products we manufacture. Accuride is nonetheless committed to working with its suppliers to educate them on these matters and on steps they can take to obtain increased transparency regarding the origin of Conflict Minerals contained in the products or materials they sell to Accuride.

This Policy Statement reflects Accuride’s commitment and its expectations for its product and raw material suppliers regarding the use of Conflict Minerals.

### **OUR COMMITMENT:**

1. Support the objectives of the Dodd-Frank Act concerning Conflict Minerals sourcing.
2. Accuride will not knowingly procure products containing Conflict Minerals that originate from facilities in the Covered Countries that are not certified as “DRC Conflict Free”.
3. Accuride will take reasonable steps to ensure compliance with this Policy Statement and applicable rules and regulations related to Conflict Minerals, and we will ask our suppliers to undertake reasonable due diligence with their supply chains to assure that any Conflict Minerals in products supplied to Accuride either did not originate in the Covered Countries or are “DRC Conflict Free”.

### **Supplier Code of Conduct with Regards to Conflict Minerals**

Accuride has the following expectations of its suppliers:

- Suppliers should not include any Conflict Minerals in any products sold to Accuride unless such Conflict Minerals either did not originate in Covered Countries or are DRC Conflict Free;
- Suppliers are required to report any Conflict Minerals that may be contained in the products or raw materials they supply to Accuride and either confirm the source of the Conflict Minerals or undertake reasonable due diligence to identify the country of origin of the Conflict Minerals;

- Suppliers should develop Conflict Mineral policies, due diligence frameworks, and management systems that are reasonably designed to prevent Conflict Minerals from being included in the products or materials sold to Accuride unless such Conflict Minerals either did not originate in Covered Countries or are DRC Conflict Free; and
- Accuride’s suppliers are expected to source Conflict Minerals only from sources outside of the Covered Countries or that are DRC Conflict Free.

Accordingly, Accuride’s Suppliers will be expected to:

- Implement and communicate to their personnel and suppliers policies that are consistent with this Policy Statement;
- Establish procedures for the traceability of Conflict Minerals, working with their suppliers to track the Conflict Minerals through the supply chain to the country of origin;
- Use reasonable efforts to source Conflict Minerals from countries other than the Covered Countries or from smelters and refiners validated as being “DRC Conflict Free”;
- Advise Accuride of the presence of Conflict Minerals in products it sells or has sold to Accuride and any determination that the supplier either has concluded or has a reasonable basis to believe that products it currently sells or has sold to Accuride are not “DRC Conflict Free”.
- Maintain reviewable business records supporting the sourcing of any Conflict Minerals contained in products sold to Accuride; and
- At its request, provide Accuride with information concerning the origin of Conflict Minerals included in products sold to Accuride, which Accuride shall be entitled to use or disclose in satisfying any legal or regulatory requirements or in any customer or marketing communications, notwithstanding the terms of any confidentiality agreements that do not specifically reference this paragraph.

### **Consequences of Supplier Non-Compliance**

Accuride monitors and evaluates its relationships with its suppliers on an ongoing basis. Accuride reserves the right to evaluate the extent to which a supplier has failed to reasonably comply with this Policy Statement and reserves the right to request additional documentation from its suppliers regarding the origin of any Conflict Minerals included in any products sold to Accuride. Suppliers who do not reasonably comply with this Policy Statement will be reviewed by Accuride’s supply chain organization in order to determine whether they will be allowed to continue to do business with Accuride and whether any necessary remedial steps must be taken to be allowed to continue as a supplier to Accuride and its business units.

### **Grievance Mechanism and Reporting**

Interested parties may report concerns and alleged violations of this Policy Statement as follows:

- **Write us at:** Accuride Corporation, Attn: Conflict Minerals Team, 7140 Office Circle, PO Box 15600, Evansville, IN 47716.
- **Email us at:** [conflictmaterials@accuridecorp.com](mailto:conflictmaterials@accuridecorp.com); or
- **Call us at:** 1-812-962-5015

Reports may be made anonymously and will be kept confidential to the fullest extent practicable. No retaliatory action will be taken against any party who makes a report in good faith.

Our suppliers are encouraged to contact us via any method outlined above if they wish to seek guidance on the application of this Policy Statement.

Accuride reserves the right to amend or revise this Policy Statement at any time.

**Conclusion**

Accuride Corporation is fully committed to fulfilling its obligations regarding Conflict Minerals and supports the humanitarian goals and objectives underlying the Dodd-Frank Act provisions and SEC rules related to Conflict Minerals. Accuride will support its customers in their Conflict Minerals compliance efforts and is committed to undertake initiatives that work towards a DRC Conflict Free supply chain. Accuride encourages all of its suppliers to support these efforts.