

DURA AUTOMOTIVE SYSTEMS, LLC
Human Resources Policies

CONFLICT MINERALS

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SCOPE

This Policy applies to all operations, globally, of Dura Automotive Systems, LLC and Global Automotive Systems, LLC.

RESPONSIBILITY

Vice President, Procurement & Logistics and the Global Sustainability Leader are responsible for policy administration.

POLICY

Dura Automotive Systems supports its OEM and Tier-1 Customer requirements to comply with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and the U.S. Securities and Exchange Commission ("SEC") rules and regulations. Dura has initiated a process to perform due diligence on, and make disclosures concerning, the use of conflict minerals originating in the Democratic Republic of the Congo and adjoining countries. Dura's process is based on guidelines and processes established by the OECD and the AIAG Conflict Minerals Workgroup.

All Dura locations and Dura suppliers must comply with requirements to record material content, including any content of Conflict Minerals (tin, tungsten, tantalum and gold) into the IMDS (International Material Data System.) Dura Suppliers must respond to information requests from Dura, and use the iPCMP system, to report the uses and sources of Conflict Minerals (tin, tungsten, tantalum and gold) in products sold to Dura, including information about minerals that are recycled or scrap.

In order to respond to Dura's information requests, suppliers will need to establish a similar process and make similar inquiries of their suppliers as a means to investigate the source of materials in their products, and to provide Dura the requested information based upon the results of such inquiries.

Dura may be required, and may require its suppliers, to support Customer audit inquiries of the diligence process and reported data in accordance with SEC audit standards, including the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas."

Finally, it is Dura's policy to avoid the use of conflict minerals originating in the Democratic Republic of the Congo and adjoining countries which fund illegal armed groups. Dura expects its suppliers to also avoid such use and to cooperate with resourcing of materials as determined by Dura and Dura's Customers