



May 6, 2019

Subject: Conflict Minerals

To Adient Suppliers:

On August 22, 2012, the U.S. Securities and Exchange Commission ("SEC") adopted final rules to implement reporting and disclosure requirements related to "conflict minerals," as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The rules require manufacturers who file certain reports with the SEC to disclose whether the products they manufacture or contract to manufacture contain "conflict minerals" that are "necessary to the functionality or production" of those products.

"Conflict minerals" refers to gold, as well as tin, tantalum, and tungsten and their compounds, regardless of where they are sourced, processed or sold. The U.S. Secretary of State may designate other minerals in the future. The intent of these requirements is to further the humanitarian goal of ending violent conflict in the Democratic Republic of the Congo (DRC) and in surrounding countries, which has been partially financed by the exploitation and trade of conflict minerals.

Adient is dedicated to conflict free sourcing and will continue to require Conflict Minerals information from our suppliers for the reporting year 2019.

**Our 2019 Supplier Expectations are:**

- **Declaration Scope**
  - The 2019 survey companies will be requested to report on **company level.**
  
- **Timing**
  - Our suppliers are requested to send the 2019 Conflict Minerals Declaration **within 30 days after receiving this letter.**
  - **Full year updates are required in December 2019 latest** as long as the supplier response rate (Q5 CMRT) is below 100%.
  
- **Method of Reporting**
  - iPoint Conflict Minerals Platform (iPCMP). The basic iPCMP license is available free of charge  
<http://www.conflict-minerals.com>
  - Conflict Minerals Reporting Template (CMRT). Only Version 5.12 or later versions will be accepted in 2019.  
<http://www.conflictreesourcing.org/conflict-minerals-reporting-template/>
  
- **2019 Reporting requirements**
  - Please **add your vendor number** as your company-unique identifier in line 12 of the CMRT.

- **The response rate** of your suppliers (Question 5 in CMRT) is expected to be **100% by end of the reporting year.**
  - **Smelter information shall be complete** (including the following information (1\*) metal, (2) smelter look-up, (3\*) Smelter Name (1), (4\*) Smelter Country, (5) smelter identification, (6) source of smelter identification number, (7\*) smelter city, (8\*) smelter facility location: State/Province, (9\*) location (country) of mine(s) or if recycled or scrap sourced, enter “recycled” or “scrap and in accordance with available RMI data **by December 31, 2019.**  
*\* mandatory for not certified smelters*
  - We expect our suppliers **not to be “indeterminate” by December 31, 2019.**
  - When selecting **“unknown” as an answer for Question 3 in CMRT** please contact RMI (<http://www.responsiblemineralsinitiative.org>) to initiate the entry of the smelter into the RMI smelter database and to encourage the smelter to participate in a certification scheme.
  - **Suppliers reporting smelters of concern\*** are requested to closely monitor their supply chain and take the necessary measures to **suspend business** with these smelters.  
*\*Please refer to the supplier training for a definition of a smelter of concern*
- **Training**
    - Training material for suppliers is available on the supplier portal as part of the Conflict Minerals documents in the Corporate Responsibility section  
<http://www.adiant.com/suppliers/corporate-responsibility>
    - The RMI offers training possibilities and guidance on their web page  
<http://www.responsiblemineralsinitiative.org/training-and-resources/>
- **Reference Links**
    - <http://www.adiant.com/suppliers/corporate-responsibility>
    - <https://www.aiag.org/corporate-responsibility/social/conflict-minerals>
    - <http://www.sec.gov>
    - <http://www.responsiblemineralsinitiative.org>
    - <http://www.oecd.org/corporate/mne/mining.htm>

Please use **AE-Conflict.Minerals@adiant.com** for any Conflict Minerals related communication.

We would like to thank all our suppliers who have already supported this initiative in 2018 for their continuous engagement.

Sincerely,



Kelli Carney

Vice President and Chief Purchasing Officer  
 Adient LLC