



Responsible Minerals Policy

Last Updated: February 2025

This policy was previously titled 'Conflict Minerals Policy' and has been renamed 'Responsible Minerals Policy' to reflect its expanded scope. Any references to Axalta's 'Conflicts Mineral Policy' in other documents should be understood as referring to this updated policy.

Background

On August 22, 2012, the U.S. Securities and Exchange Commission (“SEC”) issued the final rule under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, concerning conflict minerals (the “Conflict Minerals Rule”). The Conflict Minerals Rule was enacted to further the humanitarian goal of ending the financing of violent conflict and human rights abuses in the Covered Countries (as defined below).

3TG minerals are of concern because they are mined in the Democratic Republic of the Congo and adjoining countries (“Covered Countries”). Some mines are controlled by armed groups that finance conflict with the revenues of their mining activities.

On Jan 1, 2021, a new EU regulation came into effect for importers of 3TG minerals. Due diligence expectations under the regulation align with practices established following the SEC Conflict Minerals Rule, but verification requirements extend to a more comprehensive and evolving list of CAHRAs. While Axalta is not an importer of 3TG minerals, our stakeholders’ requests for due diligence and reporting may be inclusive of CAHRAs; therefore, we expect our direct suppliers to verify conformance of smelters when minerals originated from or transit through CAHRAs. Axalta is an active member of The Responsible Minerals Initiative.

Applicability

This Policy applies to all direct suppliers to Axalta Coating Systems, LLC and its affiliates (“Axalta” or the “Company”) of raw materials and Minerals of Concern, as defined below. A direct supplier provides materials or components to Axalta directly, whereas an indirect supplier supplies materials or components to the direct suppliers.

Axalta suppliers should review the expectations below and take appropriate steps to ensure compliance. The Company will continue to survey its suppliers to verify compliance with this Policy for responsible mineral procurement. Violations may be grounds for suspension or termination of the business relationship with the supplier.

Raw Materials

Axalta aims to use only raw materials whose extraction, production, transport, trade and processing do not contribute to human rights violations, environmental degradation or compliance breaches. Suppliers shall not directly or indirectly procure minerals or materials that contribute to illegal deforestation, nor procure minerals or materials mined from the deep seabed or sourced without respecting indigenous people.

Direct and indirect suppliers of raw materials that originate from, or are transported through, conflict-affected and high-risk areas must effectively meet their due diligence obligations in the supply chain,



outlined below in Expectations of Suppliers and Axalta's Supplier Code of Conduct, to minimize the risk of adverse impacts.

Minerals of Concern

Axalta aims to responsibly source minerals including but not limited to cobalt, mica, and 3TG minerals - tin, tungsten, tantalum, and gold – (collectively, the “Minerals of Concern”) from Conflict-Affected and High-Risk Areas (CAHRAs). We follow due diligence and assurance protocols developed by the Responsible Minerals Initiative (RMI), which adhere to OECD guidance.

Axalta does not source Minerals of Concern directly from smelters or processors; therefore, it requires direct suppliers of Minerals of Concern to map their supply chains to the smelter/processor level and verify all smelters are conformant or actively pursuing conformance with [Responsible Minerals Audit Protocol \(RMAP\) standards](#), including an audit conducted by an independent third-party auditor.

Expectations of Suppliers

Suppliers of conflict minerals must verify that each smelter and/or processor is conformant or actively pursuing conformance to RMI's Active and Conformant Facilities List and report their status to Axalta using RMI templates on an annual basis.

- Smelters/processors are required to map Minerals of Concern to origin, verify the responsible sourcing practices of mines, and report any Minerals of Concern that originate from, or transit, through CAHRAs.
- When a smelter is non-conformant with the RMAP standard, suppliers are expected to use commercially reasonable efforts to bring smelters into conformance or cease sourcing from the smelter.

The Company expects direct suppliers of processed minerals, compounds or other products containing Minerals of Concern to:

- cascade regulatory and reporting requirements through contractual agreements with their direct suppliers;
- advise their direct suppliers' due diligence and verification processes required for regulatory compliance and RMAP conformance;
- verify the conformance of all smelters/processors used or ensure non-conformant smelters/processors have established and are adhering to time-bound remediation plans;
- cease sourcing from non-conformant smelters/processors when substitutes are available;
- on an ad hoc basis, provide Axalta with information about their supply chain for these materials, as well as other critical raw materials where applicable, about the origin of material.

All such direct suppliers must reply directly to Axalta's electronic request for the following documents by Aug 31st of each year:

- the RMAP conformance status of all 3TG smelters/processors used via the Conflict Minerals Reporting Template (CMRT form);
- the RMAP conformance status of all cobalt and mica smelters/processors used via the Extended Minerals Reporting Template (EMRT form); and
- detailed plans for remediation for any non-conformant smelters/processors.



Reporting Possible Violations of this Policy

To report suspected or alleged violations of this Policy, suppliers and other stakeholders may make a formal report to the Axalta Ethics Hotline via telephone, fax, or email. Information about the Axalta Ethics Hotline is available at: www.axalta.com/helpline, or call toll free 1-800-461-9330 (for US, Mexico, and Canada) to speak to a representative. The call center supports multiple languages and international dialing instructions can be found by going to: www.axalta.com/helpline and selecting your country. The Helpline is available 24 hours, seven days a week.

Resources and References

[Axalta Code of Business Conduct and Ethics](#)

[Axalta Supplier Code of Conduct](#)

[Responsible Minerals Initiative \(RMI\) Conflict Minerals Reporting Template \(CMRT\)](#)

[Responsible Minerals Initiative \(RMI\) Extended Minerals Reporting Template \(EMRT\)](#)

[Identifying CAHRA](#)

[SEC Conflict Minerals Rule](#)

[EU Conflict Minerals Act](#)

[OECD Due Diligence Guidelines for Responsibly Sourced Minerals](#)

[Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains](#)

Adopted: July 2015 as Axalta Conflict Minerals Policy

Updated: February 2025 and expanded to Renewable Minerals Policy