

January 2014



Axalta Coating Systems, LLC & Affiliates

Conflict Minerals Policy Statement

Axalta Coating Systems, LLC and its affiliates are committed to the responsible global sourcing of minerals worldwide, to curb the violence associated with trade in conflict minerals and to respect basic human rights.

On August 22, 2012, the U.S. Securities and Exchange Commission ("SEC") issued the final conflict minerals rule under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Conflict Minerals Rule"). The Conflict Minerals Rule requires publicly traded companies to report annually the presence of conflict minerals (such as tin, tungsten, tantalum and gold) originating in the Democratic Republic of the Congo or adjoining countries ("Covered Countries") in the products they manufacture or contract to manufacture if the conflict minerals are necessary to the functionality or production of a product.

Axalta Coatings Systems, LLC is a privately held company and is not required to make public disclosures regarding the purchase of covered minerals and metals pursuant to the Conflict Minerals Rule. However, Axalta Coating Systems, LLC and its affiliates recognize that its customers may have reporting obligations and will work to support those customers in meeting their obligations.

Axalta Coating Systems, LLC and its affiliates do not directly purchase "conflict minerals" (as defined under the Conflict Minerals Rule) from the Covered Countries. Axalta Coating Systems, LLC and its affiliates do use refined metals in the manufacturing of some of its products and therefore rely on the information provided by their suppliers regarding their sourcing of metals.

Axalta Suppliers are required to provide conflict free materials and to abide by this Policy. Further, Axalta Suppliers are required to:

- define, require implementation of, and communicate to their sub-suppliers their own conflict minerals policy outlining their commitment to responsible sourcing, legal compliance and measures for implementation;
- cooperate and work with their sub-suppliers to ensure the traceability of conflict minerals;
- record all conflict minerals traceability information and preserve and maintain such documentation for no less than five years; and

- permit Axalta Coating Systems LLC or its third party auditor to audit applicable mineral sourcing documents.

Axalta Coating Systems, LLC has conducted due diligence of its suppliers and, to its knowledge, its suppliers are not sourcing conflict minerals from the Covered Countries. Axalta Coating Systems, LLC will continue to regularly perform due diligence and survey its suppliers to verify compliance with this Policy. We may reconsider our willingness to partner with suppliers that fail to comply with this Policy.