



Axalta Conflict Minerals Policy

Effective July 2015



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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 requires publicly traded companies to report annually on their use of conflict minerals. Conflict minerals as defined by the Conflict Minerals Rule currently include gold, cassiterite, columbite/tantalite and wolframite and their derivatives which are limited to tin, tungsten and tantalum (“Conflict Minerals”). These Conflict Minerals are of concern because they are mined in the Democratic Republic of the Congo and adjoining countries (“Covered Countries”) and some of the mines are controlled by armed groups that finance conflict with the revenues of their mining activities. 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.

Axalta Coating Systems, LLC and its affiliates (“the Company”) is/are committed to the responsible sourcing of minerals. The Company strives to adhere to the Conflict Minerals Rule and work diligently with its suppliers to ensure compliance. Axalta does not purchase directly from smelters. Therefore, the Company relies on its suppliers to identify the sources of Conflict Minerals and to declare the Conflict Minerals status of the products they sell to the Company.

As a result, the Company expects each of its suppliers to:

- Identify any Conflict Minerals supplied to the Company or contained in products supplied to the Company;
- Conduct appropriate due diligence on their supply chains and to determine the source of any Conflict Mineral or Conflict Mineral-containing product supplied to the Axalta;
- Provide Conflict Minerals sourcing information reasonably requested by the Company and necessary to the Company fulfilling its own due diligence and SEC reporting obligations;
- Notify us if a product supplied to Axalta contains Conflict Minerals originating in the Covered Countries and to provide smelter information as requested;
- Adopt appropriate processes for maintaining records and documentation reflecting Conflict Minerals due diligence performed by the supplier or any third party.

The Company will continue to regularly perform due diligence and survey its suppliers to verify compliance with this Policy. The Company may reconsider its willingness to partner with suppliers that fail to comply with this Policy.