

Conflict Minerals Policy Statement

Background

Eberspächer is concerned that profits from the mining, trade and sale of minerals tin, tantalum, tungsten and gold (also called “3TG”) and defined as conflict minerals are being used to directly or indirectly finance armed conflict and violence in the Democratic Republic of Congo and several adjoining countries (the “DRC Region”).

A portion of the 2010 Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”) required the Securities and Exchange Commission (“SEC”) to issue rules relating to the use of “3TG” within manufactured products. In August 2012, the SEC issued a final rule implementing the “conflict minerals” disclosure requirements of the Dodd-Frank Act (the “SEC Conflict Minerals Reporting Rule”). If an SEC registrant manufactures (or contracts to manufacture) commercial products containing “3TG” that are necessary to the products’ functionality or production, the Rule requires that company to determine the origin and status of those minerals.

Our Commitment

Eberspächer is committed to conducting its business worldwide with respect for human rights and in compliance with all applicable laws, as evidenced by our Business Partner Code of Conduct.

As part of this commitment, Eberspächer acts to sourcing responsibly and considers mining activities that fuel conflict as unacceptable.

Eberspächer will work closely with its suppliers and will seek, over time, to identify, reduce and ultimately eliminate the use in its products of conflict minerals that directly or indirectly finance or benefit armed groups.

Our Expectations

Eberspächer expects its suppliers to partner with this Conflict Minerals Policy to comply with the reporting requirements set forth in the SEC Conflict Minerals Reporting Rule. Especially Eberspächer expects its suppliers to:

- use raw materials, which mining, transport, trading, manufacturing or export does not contribute to the financing of conflicts and human rights abuse,
- establish transparency and provide information about the origin of conflict minerals tin, tungsten, tantalum and gold included in the supplies, considering all upstream suppliers,
- work with their own upstream suppliers to establish transparency and provide information about the origin for any conflict minerals,
- complete and submit to Eberspächer an annual Conflict Minerals Report (CMRT),
- cooperate with Eberspächer for any due diligence to ensure origin/sourcing of conflict minerals,
- assist Eberspächer to identify opportunities to source DRC conflict mineral-free materials.