



CONFLICT MINERALS POLICY

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INTRODUCTION

On 22 August 2012, the United States' Securities and Exchange Commission (SEC) approved the final regulation on the extraction of "conflict minerals" in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act ("Regulation on Conflict Minerals" or the "Regulation"). The aim of the Regulation on Conflict Minerals is promoting responsible sourcing and discouraging the use of minerals that could be funding the violent conflict in Central Africa.

This matter has been also addressed by initiatives carried out by the European Commission (Proposal for a Regulation of the European Parliament and the Council setting up a Union system for supply chain due diligence self-certification of responsible importers of tin, tantalum and tungsten, their ores, and gold originating in conflict-affected and high-risk areas (COM 2014/0111), dated 03 March 2014); and the OECD (OECD (2013), OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Second Edition, OECD Publishing), on a yet-to-date non-binding basis.

Which minerals are "conflict minerals"?

The Regulation currently defines the following minerals as "conflict minerals"

- Tin - cassiterite
- Tantalum - columbite-tantalite (coltan)
- Tungsten - wolfram
- Gold

The origin of conflict minerals

The Regulation requires that companies listed on the US stock exchanges should make appropriate inquiries, and, depending on the circumstances, conduct the due diligence necessary to determine the origin and chain of custody of any conflict minerals that may be used in their products and publicly report every year whether these minerals originate from and fund armed groups in the Democratic Republic of the Congo or neighbouring countries (Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, Sudan, Tanzania, Uganda and Zambia).

CONFLICT MINERALS POLICY

Aim

Although Gestamp is not listed on US stock market, some of its clients are. Therefore, it is requested from time to time to provide information on its sourcing. Gestamp recognizes the importance of responsible sourcing and commits its efforts in adhering to international standards in this field.

In general, Gestamp's suppliers must meet stringent quality requirements, and they must also respect human rights, labour laws, and environmental and ethical requirements in accordance with the principles of the Global Compact and Gestamp's Code of Conduct.

However, fully aware of its corporate responsibility not to help fund armed conflict implicitly and not to contribute to the violation of human rights, Gestamp has developed this Conflict Minerals Policy.

Gestamp undertakes to implement measures aimed at disclosing and/or avoiding the sourcing and use of minerals that could finance or benefit armed groups from the Democratic Republic of the Congo and neighbouring countries.

Gestamp expects its suppliers to implement similar measures as well, to extend them to their supply chains and to work so that the products supplied are from conflict-free sources.

In order to control and monitor this, Gestamp has created an inquiry procedure and will report from time to time on this matter.

Gestamp's commitment

In order to ensure that it does not use materials or components from dubious sources, Gestamp undertakes to:

- Adopt and enforce this Conflict Minerals Policy in all Group companies.
- Extend this Policy to its supply chain.
- Implement an inquiry process aimed at requesting information on Conflict Minerals from suppliers who may be affected by this Policy using the Conflict-Free Sourcing Initiative (CFSI) Conflict Mineral Reporting Template or such other tool(s) or format(s) as Gestamp finds advisable from time to time.
- Report periodically or when so required by an interest group with regard to its management and the results of implementing this Policy, at both the Group and its supply chain levels.

Expectations for suppliers

Gestamp specifically expects its suppliers to do the following:

- Abide by this Conflict Minerals policy (or by their own Conflicts Mineral policy, if based upon the same principles) and extend it to their supply chains.
- Implement an inquiry process to support this Policy and respond in a timely manner to Gestamp's information requests.
- Report in a timely manner on matters related to Conflict Minerals through the communication channels and formats established by Gestamp.

Gestamp reserves the right to ask its suppliers to provide additional evidence regarding Conflict Minerals in their supply chains. It expects suppliers to maintain this traceability data for five years and to submit this information to Gestamp should the latter so request.

SCOPE OF APPLICATION

This Policy applies to all companies that are part of Gestamp Automoción S.A. (see Appendix I).

RESPONSIBILITIES

It is the responsibility of all employees involved in Gestamp's procurement processes to understand and to apply this Policy along with any subsequently developed regulations and procedures.

MONITORING AND REVIEW

The monitoring and review of this Policy is the purview of Gestamp's Corporate Procurement Department.

APPENDIX I

The Policy affects all Gestamp Group companies (Gestamp Automoción S.A. and its subsidiaries).

These are:

Europe

- Gestamp Servicios, S.A.
- Autotech Engineering Deutschland, GmbH
- Autotech Engineering R&D, UK Ltd.
- Autotech Engineering, AIE
- Gestamp North Europe Services, S.L
- Gestamp Bizkaia, S.A.
- Gestamp Polska SP. Z.O.O.
- Gestamp Hungaria, Kft
- Gestamp HardTech, A.B.
- Gestamp Louny, S.R.O.
- Gestamp Washington, UK Ltd.
- Gestamp Tallent, Ltd.
- Matricería Deusto, S.L.
- Adral, Matricería y Puesta a Punto, S.L.
- Gestamp Tool Hardening, S.L.
- Gestamp Tooling Services, AIE
- Gestamp Global Tooling, S.L.
- Ingeniería y Construcción de Matrices, S.A.
- Gestamp Try Out Services, S.L.
- IxCxT, S.A.
- Loire SAFE
- Gestamp Umformtechnik GmbH
- Gestamp Griwe Hayrode, GmbH
- Gestamp Griwe Hot Stamping, GmbH
- Gestamp Griwe Westerburg, GmbH
- Gestamp Prisma S.A.S.
- Gestamp Severstal Vsevolozhsk Llc.
- Gestamp Severstal Kaluga, Llc.
- Gestamp Togliatti, Llc.
- Gestamp Metalbages, S.A.
- Gestamp Ingenieria Europa Sur, S.L.
- Gestamp Abrera, S.A.
- Gestamp Solblank Barcelona, S.A.
- Gestamp Esmar, S.A.
- Gestamp Levante, S.A.
- Gestamp Navarra, S.A.
- Gestamp Solblank Navarra, S.L.U
- Gestamp Aragón, S.A.
- Gestamp Manufacturing Autochasis, S.L.
- Gestamp Toledo, S.A.
- Gestamp Linares, S.A.

- Gestamp Palencia, S.A.
- Gestamp Galvanizados, S.A.
- Gestamp Cerveira, Lda.
- Gestamp Aveiro-Industria e Acessórios de Automóveis, S.A.
- Gestamp Vendas Novas, Lda.
- Gestamp Vigo, S.A.
- Gestamp Noury S.A.S.
- Gestamp Ronchamp, S.A.S.
- Sofedit S.A.S.
- Edscha Santander, S.L.
- Edscha Burgos, S.A.
- Edscha Briey, S.A.S.
- Edscha Engineering France S.A.S
- Edscha Holding GmbH.
- Edscha Engineering, GmbH.
- Edscha Kunststofftechnik GmbH
- Edscha Automotive Hengersberg GmbH
- Edscha Automotive Hauzenberg GmbH
- Edscha Automotive Kamenice S.R.O.
- Edscha Hradec S.R.O.
- Edscha Velky Meder S.R.O.
- Bero Tools, S.L.
- Diede Die Developments, S.L.
- Edscha Automotive Italia, S.R.L.
- Beyçelik Gestamp Şasi Otomotiv.
- Beyçelik Gestamp, A.S.
- CP Projects Ltd.
- Edscha Dienstleistungs, GmbH.
- Edscha Hauzenberg Real Estate, GmbH & Co KG
- Edscha Hengersberg Real Estate, GmbH & Co KG
- Edscha PHA Ltd.
- Edscha Togliatti, LLC.
- Gestamp 2008, S.L.
- Gestamp Finance Slovakia, S.R.O.
- Almussafes Mantenimiento de Troqueles, S.L.
- Essa Palau, S.A.
- Esymo Metal, S.L.
- G Finance Luxembourg, S.A.
- Société Générale de Financement, S.A.
- Gestamp Holding Mexico, S.L.
- Gestamp Holding Argentina, S.L.
- Gestamp Beyçelik Craiova, S.R.L.
- Gestamp Holding China, A.B.
- Gestamp Holding Rusia, S.L.
- Gestamp Mór, KFT.
- Gestamp Sweden, A.B.
- Gestamp Tech, S.L.
- Gestión Global de Matricería, S.L.

- Automotive Chassis Products, UK Ltd.
- GMF Holding GmbH.
- Gestamp Wroclaw Sp. z.o.o.
- Industrias Tamer, S.A.
- Ingeniería Global Metalbages, S.A.
- Metalbages Aragón P21, S.L.
- Metalbages P51, S.L.
- Société Civile Immobilière de Tournan Responsabilité Limitée.
- Tavol Internacional SGPS, Lda.
- Todlem, S.L.
- Gestamp Funding Luxembourg, S.A.
- Mursolar 21, S.L.

South America

- Gestamp Baires, S.A
- Gestamp Córdoba, S.A.
- Gestamp Brasil Industria de Autopeças, S/A
- Edscha Do Brasil, Ltda.
- Gestamp Argentina, S.A.

North America

- Gestamp North America, Inc
- Edscha Automotive Michigian Inc.
- Gestamp Alabama, Llc.
- Gestamp Mason, Llc.
- Gestamp Chattanooga, Llc.
- Gestamp South Carolina, Llc.
- Gestamp West Virginia Llc.
- Gestamp Aguas Calientes, S.A. de C.V.
- Gestamp Puebla, S.A. de C.V.
- Gestamp Toluca, S.A. de C. V.
- Gestamp Cartera de México, S.A. de C.V.
- Gestamp Mexicana de Servicios Laborales S.A. de C.V.
- Gestamp Puebla II, S.A. de C.V.
- Gestamp Servicios Laborales de Toluca, S.A. de C.V.
- Mexicana de Servicios Laborales, S.A. de C.V.
- GGM Puebla, S.A. de C.V.
- GGM Puebla de Servicios Laborales, S.A. de C.V.
- Gestamp 2017, S.L.

Asia

- Gestamp Autocomponents (Kunshan), Co. Ltd.
- Gestamp Metal Forming (Wuhan), Ltd.
- Gestamp Autocomponents (Shenyang), Co. Ltd.
- Gestamp Autocomponents (Dongguan), Co. Ltd.
- Gestamp Kartek Co, Ltd.
- Gs Hot Stamping Co. Ltd.

- Gestamp Automotive India Private Ltd.
- Sungwoo Gestamp Hitech Pune Private, Ltd.
- Gestamp Automotive Chennai Private Limited
- Shanghai Edscha Machinery Co., Ltd.
- Anhui Edscha Automotive Parts, Co. Ltd.
- Edscha Automotive Technology (Shanghai), Co., Ltd.
- Jui Li Edscha Body Systems,Co., Ltd.
- Gestamp Edscha Japan Co., Ltd.
- Edscha Automotive Components (Kunshan) Co., Ltd.
- Edscha Aapico Automotive Co. Ltd.
- Jui Li Edscha Hainan Industry Enterprise, Co.
- Jui Li Edscha Holding, Co Ltd.
- Gestamp Automotive Sanand, Private Limited.
- Gestamp Services India, Private Limited.