

## **VS005 Appendix C**

### **Veoneer Policy on Conflict Minerals**

Veoneer’s Standards of Business Conduct and Ethics define our principles and commitment towards legal compliance, ethical conduct, human rights, anti-corruption and environmental protection, which extend to our expectations of our partners, subcontractors and suppliers. This Policy on Conflict Minerals (the “Policy”) provides further clarification to the principles of the Standards of Business Conduct and Ethics regarding the illegal trade of natural resources, in particular certain minerals, known as Conflict Minerals.

We recognize the need to end the illegal extraction and trade of natural resources, and the associated human rights violations, conflict and environmental degradation, which results from this trade. These issues are in a critical state in the region of the Democratic Republic of Congo (DRC) as a result of certain unlawful practices in the extraction and trade of ores of tantalum, tin, tungsten and gold, which flow to world markets (including the automotive industry) through the DRC region. We are taking action to increase transparency, ensure responsible procurement, and drive positive change in this area.

We prohibit human rights abuses associated with the extraction, transport or trade of minerals. We also prohibit any direct or indirect support to non-state armed groups or security forces that illegally control or tax mine sites, transport routes, trade points, or any upstream actors in the supply chain. Similarly, we do not tolerate corruption, money-laundering and bribery. We request that parties in our supply chain agree to follow substantially the same principles and are working with our supply chain to improve traceability of minerals and ensure environmentally and socially responsible sourcing.

In order to comply with the rules and regulations promulgated by the U.S. Securities and Exchange Commission (“SEC”) under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, we will review our sourcing supply chain to identify any minerals that may qualify as “conflict minerals” under the SEC rules. Information will be requested from suppliers as appropriate. We have incorporated the principles of this policy into the requirements of our contractually binding Supplier Manual and we work with our suppliers to increase transparency in the supply chain. Veoneer supports industry initiatives, such as the Conflict Free Smelter Program (CFS), to validate that the metals used in our products are not contributing to conflict and come from sustainable sources. Once validated smelter lists are available, suppliers should procure materials only through such validated smelters.

We maintain a database of material composition information for all our products which allows us to identify suppliers that use tin, tantalum, tungsten and/or gold in their products. Material composition data along with information gathered from suppliers, industry initiatives (e.g. Conflict Free Smelter program), and other available sources are used to assess risks of non-compliance to this policy.

#### ***Modification Index***

<b>Date</b>	<b>Modification</b>	<b>Purpose</b>	<b>Distribution</b>
01-Apr-2018	.	Initial revision.	Distribution List VS000-2 – 01-Apr-2018