

Magneti Marelli Responsible Sourcing and Conflict Minerals Policy

Foreword

Magneti Marelli is firmly convinced that the respect and support of fundamental human rights is essential for building a better future for Magneti Marelli group and the communities in which we do business. This belief is expressed in the Magneti Marelli Human Rights Guidelines, which the group promotes within its sphere of influence, expecting its suppliers, contractors and other business partners to adhere to these standards.

To support this conviction, Magneti Marelli is committed to responsible sourcing and avoids knowingly using minerals that may be linked to human rights abuses. This commitment includes Conflict Minerals, currently designated as tin, tungsten, tantalum and gold (3TG) from conflict-affected and high risk areas.

Conflict Minerals

Magneti Marelli makes reasonable efforts to trace the source of any Conflict Minerals contained in products that we manufacture or contract to manufacture.

We seek to avoid knowingly using Conflict Minerals from sources that support or fund inhumane treatment of workers, including human trafficking, slavery, forced labor, child labor, torture and war crimes. Magneti Marelli submits to any Customer asking for the Conflict Minerals report an annual disclosure in compliance with the requirements of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010.

This policy is not intended to ban procurement of Conflict Minerals or other products that originate in conflict-affected and high risk areas, but to promote sourcing from responsible sources within those regions.

Due Diligence Framework for Conflict Minerals

The Company has developed a set of processes to facilitate compliance with applicable laws mandating disclosure of the sources of Conflict Minerals contained in our products.

The Company will make reasonable efforts to know, and to require Magneti Marelli suppliers to disclose to the Company, the sources of Conflict Minerals used in its products.

Magneti Marelli's suppliers are expected to assist the Company in complying with the disclosure requirements of applicable laws. Our standard terms and conditions impose a specific duty on our suppliers to provide information regarding the smelters in their supply chain.

Our direct suppliers are requested to report their use of 3TG, the processing smelter or refiner, and the country and mine of origin. Magneti Marelli direct suppliers are expected to request necessary Conflict Minerals information from their own supply chain. If a supplier's response indicates that its products do not include 3TG, the supplier must certify this information.

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