



December 5, 2016

## **Gates Corporation Conflict Mineral Policy**

### **Purpose**

On August 22, 2012, the Securities and Exchange Commission (“SEC”) approved the final rules to implement Section 1502, the conflict mineral reporting obligations, of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act. The rule requires companies that file certain SEC reports to disclose whether products they manufacture, or contract to manufacture, contain “conflict minerals” that are necessary to the production or functionality of their products.

As defined in the rule, conflict minerals include cassiterite (tin), columbite-tantalite (tantalum), wolframite (tungsten), gold and their derivatives. The U.S. Secretary of State has determined that conflict minerals are financing conflict in the Democratic Republic of Congo and its nine surrounding countries (the “DRC”).

Gates Corporation (“Gates”) is committed to maintaining a socially responsible supply chain and endeavors to source its materials from companies that share Gates’ values demonstrating respect for human rights, integrity, and environmental responsibility. Therefore, Gates is issuing this policy to further promote these values and ensure compliance with the SEC conflict minerals rule.

### **Policy**

Gates is committed to conducting its worldwide operations in a manner that complies with all applicable laws and regulations regarding conflict minerals. It is Gates’ policy to refrain from knowingly purchasing any products, components, or materials that contain conflict minerals which have not been verified as DRC Conflict-Free. Gates does not purchase tin, tantalum, tungsten, or gold (“3TG”) directly from smelters or mines. Gates is working with its suppliers to ensure awareness and compliance with the terms of this policy.

### **Reporting**

Although Gates is not obligated to report to the SEC, it understands the importance of making this information available to its customers and other stakeholders. Therefore, Gates collects supplier information in order to update the industry standard EICC-GeSI Conflict Minerals Reporting Template by October 1<sup>st</sup> each year that the SEC conflict minerals rule remains in effect. The current Gates Conflict Minerals Report is available at <http://www.gates.com/about-gates/policies/hse-policy> and in the iPoint Conflict Minerals Platform under the iPCMP number 11583.

If you have any questions regarding this policy please contact the Law Department at [compliance@gates.com](mailto:compliance@gates.com).