

BORGWARNER

Conflict Minerals Statement

BorgWarner is committed to complying with all applicable conflict minerals reporting requirements administered by the U.S. Securities & Exchange Commission (“SEC”).¹ BorgWarner maintains a conflict minerals program that evaluates our supply chain and works to ensure that our international sourcing activities do not directly or indirectly fund armed groups in the Democratic Republic of the Congo (“DRC”) and other “covered countries.”² We also work proactively with our third-party suppliers to minimize the potential use of conflict minerals in our global supply chains whenever possible.

BorgWarner has a complex, geographically dispersed supply chain that relies on third parties who obtain products through their own multi-tiered supply arrangements. This makes identifying and eliminating potential sources of conflict minerals challenging. To address these challenges and assess risk exposure, BorgWarner conducts a reasonable Country of Origin inquiry on the products we manufacture and performs supply chain due diligence consistent with the processes and procedures set forth in the Organization for Economic Co-operation and Development’s (“OECD”) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. BorgWarner expects all suppliers to cascade this guidance to sub-tier suppliers and report any risks that are identified.

BorgWarner encourages our third-party suppliers to source conflict minerals from smelters that are compliant with the Responsible Minerals Assurance Progress (“RMAP”) standards as stated by the Responsible Minerals Initiative (“RMI”). This process includes contacting third-party suppliers whenever their Conflict Minerals Reporting Template (“CMRT”) indicates the use of non-conforming smelters. BorgWarner then works with these suppliers to determine whether the sourced conflict minerals from non-conformant smelters are supplied to BorgWarner and used in BorgWarner products.

If a supplier in our supply chain is sourcing from non-conformant smelters for parts shipped to BorgWarner, we will seek an acceptable remediation, such as direct communications, compliance education, and training to resolve supplier non-conformances. We may also reevaluate our business relationship with that supplier. This approach emphasizes continuous monitoring and improvement throughout our supply chain.

Signature:



Miyuki Oshima
VP, Chief Compliance & Data Privacy Officer

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¹ The term “conflict minerals” currently includes gold, tin, tantalum, and tungsten, as well as the derivatives of cassiterite, columbite-tantalite, and wolframite, regardless of where they are sourced, processed, or sold.

² In addition to the DRC, the term “Covered Countries” currently includes Angola, Burundi, the Central African Republic, the Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.