

## **Triumph Group, Inc. Conflict Minerals Policy**

Triumph Group, Inc. (“Triumph”) is committed to sourcing components and materials from companies that share our values around human rights, ethics and environmental responsibility. Triumph condemns the ongoing violence and humanitarian crisis in the Democratic Republic of the Congo (the “DRC”) and adjoining countries, fueled partly by financing trade in minerals referred to “conflict minerals.”<sup>1</sup>

These conflict minerals make their way into the supply chains of various products used by consumers and businesses around the world. As a downstream user of product that may contain conflict minerals, Triumph recognizes its role to use gold, tantalum, tin and tungsten in our products that do not directly or indirectly finance or benefit armed groups in the DRC or adjoining countries while continuing to support responsible mineral sourcing in the region.

Triumph is using the Organisation for Economic Co-operation and Development (“OECD”) due diligence guidance as an international framework for meeting the sourcing expectations of our customers, regulators and stakeholders.

Through this framework, Triumph will:

- Comply with the requirements of Section 1502 of the Dodd-Frank Act and Section 13(p) of the Securities Exchange Act of 1934, as amended, requiring publicly traded companies to report to the SEC annually on the reasonable country of origin inquiry regarding the presence of conflict minerals in company products; and
- Exercise due diligence with relevant suppliers consistent with the Downstream Implementation of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and encourage our suppliers to do likewise with their suppliers.
- Provide, and expect our suppliers to cooperate in providing, due diligence information to confirm the gold, tantalum, tin, and tungsten in our supply-chain are “conflict free.”<sup>2</sup>
- Collaborate with our suppliers and others in industry-wide solutions to enable components and materials, and thereby products that are “DRC conflict free”<sup>3</sup>, through the ability to track and trace the source of conflict minerals back to the smelter and mine of origin.

This policy will be regularly reviewed and updated as necessary and will be applicable and communicated to all impacted stakeholders.

Originally approved by the Board of Directors: November 15, 2013  
Last revision approved by the Board of Directors: April 29, 2016

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1. “Conflict mineral” as defined by Securities and Exchange Commission (SEC) rules means columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives which are limited to tantalum, tin, and tungsten, unless the Secretary of State determines that additional derivatives are financing conflict in the DRC or an adjoining country; or any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the DRC or an adjoining country.
  2. By “Conflict Free,” we refer to suppliers, supply chains, smelters and refiners whose sources of conflict minerals did not or do not directly or indirectly finance or benefit armed groups in the DRC or adjoining countries.
  3. “DRC conflict free” as defined by SEC rules means that a product does not contain conflict minerals necessary to the functionality or production of that product that directly or indirectly finance or benefit armed groups in the DRC or an adjoining country.