

**The Aaron's Company, Inc.**

**Conflict Minerals Policy**

**As of November 11, 2020**

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## **1.0 The Aaron's Company's Commitment to the Use of Conflict-Free Minerals**

The Aaron's Company supports efforts to further the humanitarian goal of ending the violence and human rights abuses in the mining of certain minerals in the Democratic Republic of Congo and surrounding countries (collectively, the "DRC"). We are committed to supporting legitimate commercial ventures in the region and to refraining from actions, directly or indirectly, which contribute to the financing of such conflict or the support of such abuses.

The Aaron's Company is fully committed to complying with applicable U.S. federal, state and local legislation, as well as applicable regulatory requirements, intended to address these humanitarian and commercial concerns. Rules adopted by the U.S. Securities Exchange Commission ("SEC"), as required under the Dodd-Frank Act, impose disclosure and reporting requirements on the use of "conflict minerals" (tantalum, tin, tungsten and gold, or "3TGs") in manufactured products, if such minerals originated in the DRC.

As a public company subject to these reporting requirements, we strive to increase transparency and ensure responsible procurement by our suppliers and sub-suppliers to ensure all components, parts and materials used to manufacture our products contain minerals from conflict-free sources. The Aaron's Company will not knowingly tolerate, or profit from, contribute to, assist or facilitate any activity that fuels conflict or encourages abuses of human rights.

## **2.0 Company Initiatives**

We are implementing a reasonable due diligence process to determine whether conflict minerals are contained in and necessary to the functionality or production of any of the products we manufacture or contract to manufacture. Our process will also strive to determine, to the degree reasonably possible, the country of origin of those identified minerals and the mine or smelter serving as the source of origin. We will adhere to the diligence framework and related guidance established by the Organization for Economic Co-operation and Development ("OECD") as well as cross-industry tools that have been developed and are available to us. We will adopt and maintain standardized reporting templates, which our suppliers will be required to complete and certify. We will communicate our Policy to suppliers and support objectives to validate that the minerals used in our products are not contributing to conflict or violation of human rights. We intend to be compliant with SEC reporting and disclosure requirements relating to conflict minerals, as well as any state or local regulations, and, in that regard, to ensure we are able to file the required disclosures and reports on a timely and complete basis.

## **3.0 Supply Chain Initiatives**

We are committed to working with our suppliers to increase transparency regarding the origin and traceability of 3TGs contained in our products. We strive to ensure that all of our suppliers who provide us with components, parts or materials containing the 3TGs commit to conflict-free sourcing and develop policies and procedures to prevent the

sourcing of 3TGs or their derivative metals from mines or smelters controlled by armed groups in the DRC. We expect our suppliers to comply with the OECD guidance and industry standards and to ensure that their supplier chain conforms to this Policy and OECD guidance as well. We require our suppliers to document their efforts to determine the source of any conflict minerals (or derivatives) and to provide us with written evidence, reliable representations and certifications of such efforts. Specifically, we expect our suppliers to confirm to us that any 3TGs in components, parts or materials provided to us for use in our products are either sourced only from mines or smelters outside of the conflict region or from mines or smelters certified by an independent third party as “DRC conflict-free” if sourced within the DRC. We may request additional information of the supply chain when necessary.

We have incorporated the principles of this Policy into our Purchase Order procedures and documents. We aim to develop and maintain long-term relationships with our suppliers; however, if we identify a reasonable risk that a supplier is violating our Policy or unwilling to comply with our Policy, we will require them to implement a corrective action plan. We may also take other appropriate actions to transition the affected product to be “conflict-free.” Continued non-compliance by a supplier with our Policy will result in termination of the relationship.

#### **4.0 Additional Information**

This Policy will be reviewed annually and updated as needed. Questions regarding this Policy and our compliance program may be addressed to the Director of Compliance & Privacy.

#### **5.0 Compliance and Enforcement**

Compliance with this Policy and all The Aaron’s Company policies is mandatory. Compliance with this Policy may be verified through various methods, including but not limited to, reports from available business tools, internal and external audits, self-assessment, and/or feedback to the policy owner.

Violations of this Policy may result in disciplinary action, up to and including termination.

#### **6.0 Custodians**

The custodian of this Policy is The Aaron’s Company Legal Department, which is responsible for implementation of the Policy. Any questions regarding the implementation of this Policy must be directed to the Legal Department.

#### **7.0 Change History**

This Policy is a living document that will be reviewed and updated annually, or more often if the need arises, based on changes in technology, applications, procedures, business needs, or threats.

## 8.0 Approval

Board of Directors	November 11, 2020