



HORIZON RESPONSIBLE SOURCING AND CONFLICT MINERALS POLICY

Horizon Global Corporation and its subsidiary companies (collectively, “Horizon”) are determined to partner with suppliers who share our commitment to responsible sourcing and our values around human rights, ethics and environmental responsibility. Our responsible sourcing efforts include supplier acknowledgment of the Horizon Social Compliance Policy, which may be viewed at <http://www.horizonglobal.com/investors-corporate-governance>.

Horizon’s commitment to responsible sourcing also includes support of the goals and objectives of the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502 and related regulations (the “Act”), which aims to prevent the use of conflict minerals that directly or indirectly finance or benefit armed groups in The Democratic Republic of the Congo or an adjoining country defined in the Act and related regulations (collectively, “DRC”). Conflict Minerals include columbite-tantalite (coltan) (i.e. tantalum), cassiterite (i.e. tin), gold, wolframite (i.e. tungsten) or their derivatives and could expand to include other minerals determined by the United States to be financing the DRC conflict. Horizon will strive to conduct diligence with respect to the sourcing of Conflict Minerals and will comply with reporting obligations required by the Act.

To the extent required by the Act, Horizon will seek from its suppliers information related to the country of origin of any Conflict Minerals that are contained in materials, parts and/or products provided to Horizon for manufacture and/or sale of products to our customers. Horizon will request suppliers who supply Horizon with materials containing Conflict Minerals to procure these materials from a validated supply chain. Horizon may rely on efforts by third party organizations and third party assessments to enhance Horizon’s efforts in furtherance of this policy.