



CONFLICT MINERALS POLICY

[As adopted March 2013]

This document contains the policy of Gentherm Incorporated (“Gentherm”) regarding the use of conflict minerals in its products. This policy will be reviewed and updated as needed.

Regulatory Overview

In July 2010, President Obama signed into law the Wall Street Reform and Consumer Protection Act, also known as the Dodd-Frank Act. On August 22, 2012, the Securities and Exchange Commission (the “SEC”) adopted a conflict minerals rule (the “Conflict Minerals Rule”) as mandated by Section 1502 of the Dodd-Frank Act. The Conflict Minerals Rule is intended to reduce a significant source of funding for armed groups that are committing human rights abuses in the Democratic Republic of the Congo (the “DRC”) and its adjoining countries. To the extent that “conflict minerals” are necessary to the functionality or production of products that Gentherm manufactures or contracts to manufacture, we are required to conduct supply chain diligence to determine whether the conflict minerals originated in the DRC or one of the other “covered countries.” To the extent that our products contain conflict minerals that are necessary to their functionality or production, we are required to make certain disclosures on Form SD, a new SEC form. Additional disclosure obligations are triggered to the extent that the conflict minerals are from a covered country or we are unable to determine the source of the conflict minerals. Our first report on Form SD must be filed no later than May 31, 2014 and pertains to our use of conflict minerals for calendar 2013.

“Conflict minerals” are defined in the Conflict Minerals Rule as cassiterite, columbite-tantalite (coltan), gold, wolframite and three specified derivatives: tin; tantalum; and tungsten. In addition to the DRC, the “covered countries” are defined in the Conflict Minerals Rule as: (1) Angola; (2) Burundi; (3) Central African Republic; (4) the Republic of the Congo; (5) Rwanda; (6) South Sudan; (7) Tanzania; (8) Uganda; and (9) Zambia.

Gentherm Policy Statement

Gentherm takes its obligations under SEC and other regulations seriously and intends to comply with the Conflict Minerals Rule. Gentherm is committed to avoiding the use of Conflict Minerals which directly or indirectly finance or benefit armed groups in the DRC or adjoining countries. Gentherm has adopted this policy as part of our efforts to encourage our suppliers to respect human rights and not contribute to conflict.