



# Conflict Minerals Position

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## Mattel's Commitment to Responsible Sourcing

As a leader in the toy industry, Mattel is committed to acting with integrity in all that we do to bring to the world safe toys that grown-ups trust and children love. We strive to positively impact our people and our planet by playing responsibly. Sourcing conflict-free minerals in our products further advances our commitment to responsible practices. We do not condone human rights abuses or violence in any form and as such we are taking steps to ensure that minerals procured for use in our products do not support conflicts in the Democratic Republic of Congo or adjoining countries. In this regard, Mattel will perform the necessary due diligence to avoid the use of minerals that benefit armed groups in these countries in accordance with the Organisation for Economic Co-operation and Development (OECD)'s *Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*.

The Democratic Republic of Congo (DRC), as well as adjoining countries, (collectively, the "Covered Countries") contain vast amounts of the natural resources tin, tantalum, tungsten and gold ("3TG's"). Some of the mines and smelters located within the Covered Countries, which have been used to source 3TG minerals, have directly or indirectly contributed to the financing of armed groups engaged in civil war and human rights violations. A provision in the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act, enacted in 2010, requires public companies to submit annual reports beginning May 31, 2014, to the U.S. Securities and Exchange Commission (SEC) on the due-diligence performed to determine if the products they manufacture or contract to manufacture contain 3TG minerals originating in the Covered Countries that funded armed conflict in those countries. In order not to penalize unfairly the economies and peoples of the Covered Countries, Mattel may use 3TG minerals in its supply chain that originate in the Covered Countries, but Mattel ***will not use*** 3TG minerals in its supply chain that originate in the Covered Countries ***if*** the original sale of the 3TG minerals funded armed groups in the Covered Countries. This is what Mattel means by "conflict-free mineral sourcing."

## Mattel's Progress Toward Conflict-Free Mineral Sourcing

Mattel has a long-standing commitment to ethical sourcing and the Company complies with all national and international laws. To address this issue, we are actively engaging our suppliers and asking for their cooperation in conducting the necessary due diligence related to conflict minerals, as well as integrating related requirements into our supply chain management systems. These actions include the following:

### 1) Supplier Engagement

Mattel's position will be communicated throughout our supply chain. Suppliers will be asked to cooperate in our efforts to identify the presence of 3TG's in products. Suppliers will be required to adhere to Mattel requirements and perform a reasonable country of origin inquiry to determine whether the 3TG minerals originated in the Covered Countries. If so, and the 3TG minerals were not obtained from recycled or scrap sources, suppliers will be required to conduct due diligence demonstrating that the original sale did not fund armed groups in the Covered Countries.

A platform based on the Electronic Industry Citizenship Coalition's Conflict-Free Sourcing Initiative's reporting template will be used to collect and analyze data from suppliers. Education and guidance related to conflict minerals and the reporting tool will be provided to suppliers.



## **2) Assessing and Responding to Identified Risks**

If Mattel becomes aware of a supplier whose supply chain includes 3TG minerals that are not conflict-free, the Company will take appropriate actions to remedy the situation in a timely manner, which could include reassessment of the supplier relationship. Mattel advises suppliers to take similar measures with their own sub-suppliers to ensure alignment and traceability throughout the supply chain and back to the smelter.

## **3) Industry Collaboration**

Tracing minerals is a complex challenge and one that no company can solve alone. We support multi-stakeholder efforts and industry-wide collaboration focused on procuring conflict-free minerals. Mattel will continue to work in partnership with the OECD, the Electronic Industry Citizenship Coalition's Conflict-Free Sourcing Initiative and toy industry associations around the world.

## **4) Public Reporting**

Mattel will comply with the SEC reporting requirements regarding 3TG minerals. Progress toward sourcing conflict-free minerals will be reported through Mattel's Global Citizenship Reports.