



Conflict Minerals Policy

Background

In recent years there has been increased concern that the exploitation and trade of certain minerals originating in the Democratic Republic of the Congo and surrounding countries are helping to finance armed conflict characterized by extreme levels of violence. Tin, tantalum, tungsten and gold are commonly referred to as “conflict minerals” regardless of their country of origin. As required by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, the U.S. Securities & Exchange Commission (“SEC”) has adopted a rule to bring greater supply chain transparency to the use of conflict minerals originating from the Democratic Republic of the Congo and surrounding countries. The SEC’s Conflict Minerals Rule requires SEC registrants who manufacture or contract to manufacture products containing conflict minerals that are necessary to such products’ functionality or production to disclose the origin and status of the conflict minerals.

Policy Statement

Workhorse is committed to corporate responsibility and respecting human rights in its operations and in its global supply chain. Workhorse actively engages with its suppliers to reduce the risk that the materials we procure contain conflict minerals that finance violence in central Africa. Suppliers of conflict minerals are sent a Conflict Minerals Reporting Template (“CMRT”) developed by the Responsible Minerals Initiative and asked to complete the template for products or materials supplied to us. The CMRT follows the guidelines set by the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Workhorse reviews the responses and follows up with suppliers whose responses are incomplete or potentially inconsistent with our conflict minerals policy. Workhorse expects its suppliers to supply only conflict minerals, and compounds of conflict minerals, that do not directly or indirectly finance or benefit armed groups in the DRC or an adjoining country. Workhorse requires its suppliers to provide information regarding the sourcing of conflict minerals, and compounds of conflict minerals, in its products.

We expect our suppliers to undertake reasonable due diligence of their supply chain and to respond to questionnaires and related inquiries when requested by us.

If you require specific conflict mineral sourcing information for Workhorse products or require more information on our policy, please inquire at **Brian.Niederegger@workhorse.com**.