

## **ACUSHNET COMPANY**

### **CONFLICT MINERALS POLICY**

At Acushnet Company, we are dedicated to operating ethically. As part of our commitment to operating ethically, Acushnet is committed to the responsible sourcing of materials for its products. This includes the responsible sourcing of tin, tantalum, tungsten and gold, which are often referred to as “3TG” or “conflict minerals.”

To help ensure the responsible sourcing of 3TG in our products, we have adopted this Policy. In addition, as required by the U.S. Conflict Minerals Rule, we follow the relevant processes and procedures set forth in the Organisation for Economic Co-operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the “OECD Guidance”).

Acushnet does not directly source 3TG from mines, smelters or refiners, and is many levels removed from these market participants. We therefore require the cooperation of our suppliers in the implementation of this Policy.

Acushnet expects its suppliers to source 3TG only from sources that do not directly or indirectly benefit or finance armed groups, whether in the Democratic Republic of the Congo region or other parts of the world. In addition, we expect our suppliers to, where possible, source 3TG from smelters and refiners that are validated as being “conflict free” or conformant with a third-party audit protocol addressing responsible sourcing. Suppliers who do not comply with these expectations will be reviewed and evaluated accordingly for future business and sourcing decisions.

In furtherance of this Policy, and without limiting the foregoing, suppliers are expected to:

- Put in place procedures for the traceability of 3TG;
- Cooperate with our 3TG due diligence process, which includes providing us, from time to time, with written certifications and other information concerning the origin of 3TG included in products and/or components supplied to Acushnet;
- Maintain reviewable business records supporting the source of 3TG;
- Adopt policies and procedures with respect to 3TG consistent with Acushnet’s policy and practices set forth herein and the OECD Guidance, including the adoption of a risk mitigation strategy to respond to identified risks in the supply chain, and communicate such policies and procedures to their personnel and direct and indirect suppliers; and

- Require their direct and indirect suppliers to adopt policies and procedures that are consistent with this Policy.

Suppliers are encouraged to contact the production teams with whom they regularly conduct business if they have questions concerning this Policy. In addition, concerns regarding this Policy, or violations, can be reported as follows:

By internet: [www.acushnetcompliance.com](http://www.acushnetcompliance.com)

By telephone: 1-855-219-7326

Suppliers also are expected to follow our Supplier Citizenship Policy, which is available at <https://www.acushnetholdingscorp.com/supplier-citizenship-policy/default.aspx>, as well as our other relevant policies and procedures.