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Titan International Inc.

Conflict Minerals Policy

Introduction

The proceeds from mining conflict minerals from the Democratic Republic of Congo (DRC) and adjoining countries have been connected to the financing of illegal armed groups and human rights abuses. As such, the United States Securities and Exchange Commission (SEC) has legislation in place to prevent financing of these groups when sourcing conflict minerals. Per Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, the SEC requires publicly traded companies to annually disclose whether conflict minerals that are necessary to the functionality or production of a company's products originated from the DRC or adjoining countries. Further, the SEC mandates reporting around the origin and sourcing of conflict minerals from the DRC or adjoining countries.

Definitions

Conflict minerals are defined as cassiterite, columbite-tantalite, gold, wolframite, and their derivatives, which are tantalum, tin, and tungsten. This list is subject to change as the U.S. Secretary of State may determine other minerals or derivatives are financing conflict in the DRC or its adjoining countries.

DRC adjoining countries are defined as countries sharing an internationally recognized border with the DRC. These are Angola, Burundi, Central African Republic, Rwanda, South Sudan, Tanzania, the Republic of the Congo, Uganda, and Zambia.

Scope

This policy applies to all Titan International Inc. (Titan) manufacturing entities and locations. Further, Titan communicates our expectation that suppliers uphold this Conflict Minerals Policy in our Supplier Code of Conduct.

Policy

Titan is a conflict minerals free company. Conflict minerals are neither purchased nor do they enter any Titan products. Conflict minerals are not necessary to the functionality or production of any item manufactured by Titan Tire, Titan Wheel, or any other subsidiary of Titan, as they are not part of any formulation or recipe of any product manufactured by Titan.