

Conflict Mineral Policy

Document # REG-1026

1.0 PURPOSE

Callaway is committed to responsible sourcing of materials for its products. Likewise, Callaway Golf opposes having in its products Conflict Minerals that directly or indirectly finance or benefit armed groups in the Covered Countries.

It is Callaway's goal that our products are "DRC Conflict Free".

2.0 POLICY

This policy is intended to establish procedures to comply with the Conflict Mineral Rule and identify responsibility and authority for implementing the Conflict Minerals Rule Policy.

3.0 DEFINITIONS

Conflict Minerals are four designated minerals and their derivatives:

- Tin and Cassiterite
- Tantalum and Columbite-tantalite
- Tungsten and Wolframite
- Gold

Covered Countries (aka DRC Countries) – Democratic Republic of the Congo and adjoining countries: Angola, Republic of Congo, Central Africa, African Republic, Sudan, Uganda, Tanzania, Burundi, Rwanda, Zambia

4.0 RELATED DOCUMENTS

4.1 17 CFR Parts 240 and 249b (Conflict Minerals)

5.0 RESPONSIBILITY AND AUTHORITY

5.1 **Suppliers** are responsible for responding to questionnaires and data requests in a timely manner. Suppliers should have a Conflict Mineral Policy and procedures to source DRC Free Product and components. Where Conflict Minerals are present in supplied product, the supplier shall provide documentation necessary to make a "Conflict Free" determination or support Due Diligence necessary to meet SEC reporting requirements.

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6.0 PROCEDURES

Callaway will follow a three step Supplier Inquiry Process consisting of:

1. Determine if Conflict Minerals are in Product
2. Conduct Country of Origin Inquiry
3. Additional Due Diligence

Specific details on the procedure are found in the Callaway Golf Conflict Minerals Procedure.