

PELTON

CONFLICT MINERALS POLICY

Effective Date: September 9, 2021
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Introduction

At Peloton Interactive, Inc. (“Peloton”), we respect human rights for all workers throughout our supply chain, and take steps to help ensure more responsible sourcing practices. We expect our partners to adhere to the Guiding Principles set forth in Peloton’s Supplier Code of Conduct, which establishes expectations around sourcing of products in a socially and environmentally responsible manner. We endeavor to only work with vendors that share these commitments.

Policy Framework

Peloton endeavors to meet these commitments and is committed to ensuring compliance with Section 1502 of the U.S. Dodd-Frank Act relating to the sourcing of conflict minerals. This law requires public companies like Peloton to conduct supply chain due diligence regarding conflict minerals that are necessary to the functionality or production of a product manufactured or contracted for manufacture and that originates in the Democratic Republic of Congo (“DRC”) or adjoining countries. The law also requires public companies to report on these due diligence efforts to the U.S. Securities and Exchange Commission (“SEC”). Conflict minerals refer to certain minerals and their derivatives – including tin, tantalum, tungsten, and gold – that may, directly or indirectly, finance or benefit armed conflicts in the DRC or adjoining countries.¹

Peloton’s Conflict Minerals Procedures

We support responsible sourcing of conflict minerals from the DRC and adjoining countries in accordance with 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 and the supplements thereto (“OECD Guidance”) (including the OECD Guidance’s model supply chain policy) and our Code of Conduct.

Given the complexity of our supply chain, we recognize the need for the full cooperation of our suppliers. We expect our suppliers to source conflict minerals from

smelters and refiners that have completed an industry standard independent third-party conflict minerals audit and require that such suppliers have policies in place to conduct responsible conflict minerals sourcing within their own supply chains that conform to the OECD Guidance. We require that in-scope suppliers (those for whom conflict minerals are necessary to the functionality or production of a product that we sell) annually provide to Peloton, in a timely manner following any request, a complete, accurate and current Responsible Minerals Initiative Conflict Minerals Reporting Template, and also that such suppliers promptly provide copies of their related policies and supporting information if requested.

If a supplier does not meet our expectations regarding responsible sourcing, we will work with the supplier, including by leveraging industry-wide programs as appropriate, to build its capacity for responsible sourcing. We will continue to monitor global developments and the emergence of additional requirements or standards related to the sourcing of minerals or other materials from the DRC and adjoining countries or other regions to continually improve our conflict minerals program.

If a supplier discovers or otherwise has reason to believe that it has supplied or intends to supply a product to us containing any conflict mineral(s) from the DRC or adjoining countries, the supplier should immediately inform us of the product (including the conflict mineral(s) it contains) and provide any further information requested regarding the product in question.

Peloton employees whose responsibilities relate to the sourcing of parts, components, and materials are expected to support Peloton’s compliance with these requirements, associated legislation, and regulations, and are provided periodic training on conflict minerals.

Employees, suppliers, and other interested parties may report known, suspected, or potential violations of our Conflict Minerals Policy through Peloton’s [Integrity Helpline](#), by calling toll free +1 (866) 200-2298, or by emailing ethics@onepeloton.com.

¹ Adjoining countries refers to countries that share an internationally recognized border with the DRC. These countries include Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia.

