



## Conflict Mineral Reporting Policy

On August 22, 2012, the U.S. Securities and Exchange Commission (SEC) adopted final rules to implement reporting and disclosure requirements concerning Conflict Minerals, as directed by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. These rules require manufacturers that file certain reports with the SEC to disclose in a new “Form SD” filing whether the products they manufacture or contract to manufacture contain Conflict Minerals that are “necessary to the functionality or production” of their products – and, if so, whether these materials can be declared “conflict free.”

“Conflict Minerals” currently include cassiterite, columbite/tantalite, and wolframite (the most common derivatives of which are tin, tantalum and tungsten, respectively) as well as gold, regardless of where these minerals are mined, processed or sold. (The U.S. Secretary of State may designate other minerals in the future.)

The requirements regarding Conflict Minerals were enacted to further the humanitarian goal of ending violent conflict and human rights abuses in the Democratic Republic of the Congo and surrounding countries which have been partially financed by the exploitation and trade of Conflict Minerals.

Starting in May 2014, Winnebago Industries, Inc. will be required to report annually to the SEC whether our products that contain Conflict Minerals are “conflict free.” All suppliers globally that provide parts contained in our vehicles, service parts, or other parts sold by Winnebago Industries, Inc. are required to support this effort. Specifically, suppliers will be required to respond to an annual survey to identify whether products they manufacture or contract to manufacture for Winnebago Industries, Inc. contain any Conflict Minerals necessary to the functionality or production of their products. If any Conflict Minerals are contained in the affected product supplied to us, the supplier will be required to determine the country of origin of these materials and whether the Conflict Minerals can be identified as “conflict free,” and to report this information to Winnebago Industries, Inc.

Winnebago Industries, Inc. is committed to complying with this legislation and is taking steps to comply with the regulations. We are working with our suppliers to determine what information is available with regard to the presence of Conflict Materials in our products.