

<b>WINNEBAGO</b> INDUSTRIES	<b>Policy</b>
Title: Conflict Mineral Policy	Doc ID: SC-074
Owner: Supply Chain	Revision: A

## Purpose

This policy outlines the commitment of Winnebago Industries to responsibly source tin, tantalum, tungsten, and gold ("3TG") in accordance with the U.S. Securities and Exchange Commission (SEC) Conflict Minerals Rule and the Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

## Scope

This policy applies to all employees of Winnebago Industries and its affiliates ("the Company"), as well as all direct and indirect suppliers of materials or components that may contain 3TG.

## Policy Statement

Winnebago Industries is committed to:

- **Sourcing 3TG responsibly:** We strive to source 3TG from conflict-free and ethical sources.
- **Transparency and Accountability:** We will exercise due diligence to determine the origin of 3TG in our products and report findings as required by law.
- **Supply Chain Engagement:** We will actively engage with our suppliers to understand their sourcing practices and encourage them to adopt responsible sourcing policies.
- **Continuous Improvement:** We will continually review and improve our conflict minerals program to ensure its effectiveness.

## Due Diligence

To fulfill our due diligence obligations, the Company will:

- **Identify and Assess Risk:** Determine which products contain 3TG and assess the risk of sourcing conflict minerals within our supply chain.
- **Conduct Reasonable Country of Origin Inquiry (RCOI):** Engage with suppliers to obtain information on the origin of 3TG in their products.
- **Identify and Verify Smelters and Refiners:** Determine the smelters and refiners that supply 3TG to our supply chain and verify their participation in recognized industry initiatives (e.g., the Conflict-Free Sourcing Initiative (CFSI)).
- **Develop and Implement a Risk Mitigation Plan:** If risks are identified, develop and implement a plan to address them, which may include:
  - Engaging with suppliers to implement improved sourcing practices.
  - Diversifying sourcing to reduce reliance on high-risk or sanctioned sources.
- **Maintain Records:** Maintain accurate records of our due diligence activities, including supplier communications, risk assessments, and verification results.

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**Supplier Engagement**

The Company will communicate our commitment to the sourcing of conflict-free 3TG to suppliers and request their cooperation in our due diligence efforts.

**Reporting**

The Company will publicly disclose our conflict minerals report (Form SD), which includes disclosure of sanctioned suppliers, annually on our corporate website (or as otherwise required by law) on or before May 31<sup>st</sup>, covering the previous calendar year.

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### Definitions

Term or Acronym	Definition
3TG	Tantalum, Tin, Tungsten & Gold, which are the current minerals regulated in the SEC Conflict Minerals Rule.
Conflict Minerals	A mineral mined in an area of armed conflicted and traded illicitly to finance the fighting, generally in the DRC or surrounding area.

### Important Reference Documents

Reference Title	Reference Location or Link
Outside resource on Conflict Minerals and reporting templates	<a href="https://www.responsiblemineralsinitiative.org/">https://www.responsiblemineralsinitiative.org/</a>
SEC Final Rule	<a href="https://www.sec.gov/files/rules/final/2012/34-67716.pdf">https://www.sec.gov/files/rules/final/2012/34-67716.pdf</a>

### Document Approvals

Approver Name	Approver Title	Approval Date
Mark Danovsky	VP of Supply Chain	3/17/25
Troy Cornell	Director, Enterprise Product Safety & Compliance	2/25/25
Megan Pollock	Assistant Corporate Controller	3/17/25

### Revision History

Revision #	Change Notes
A	Previous policy statement was without a revision. Moving the updated policy to the new format and starting at revision A. Replaces VNF-001.