



THOR

Go Everywhere. Stay Anywhere.

Conflict Minerals Policy

The Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Dodd-Frank Act") was signed into law by President Obama in July 2010. Section 1502 of the Dodd-Frank Act imposes certain Securities and Exchange Commission ("SEC") reporting requirements on publicly-traded companies whose products contain metals derived from minerals known as "Conflict Minerals", which include gold, tin, tantalum, and tungsten, that originated from the Democratic Republic of Congo ("DRC") or an adjoining country. The reporting requirements reflect Congressional concern that revenues obtained from the mining and transport of Conflict Minerals finance the ongoing conflict in the DRC.

THOR Industries, Inc. ("THOR") is concerned about the abuses related to the illegal mining and transport of Conflict Minerals in the DRC and adjoining countries and intends not only to comply with these Conflict Mineral requirements, but also expects its suppliers to do the same. However, THOR does not purchase any raw materials that are used in the manufacture of its products directly from smelters, refiners, or mines. Instead, the raw materials pass through several supply chain layers. To determine the source of these raw materials and whether its suppliers' products contain Conflict Minerals from the DRC or an adjoining country, THOR conducts due diligence inquiries of its supply chain using a third-party platform. THOR requests that its suppliers will, as necessary, perform the same due diligence by asking their upstream suppliers about the presence, source, and origin of any Conflict Minerals.

THOR seeks to have its products manufactured with minerals that are conflict free and has devoted significant resources and effort to comply with the Conflict Mineral reporting requirements, but the process of tracking the source and origin of Conflict Minerals is a complicated one. Many of THOR's suppliers may lack the resources to track the Conflict Minerals to the original smelter, refiner, or mine. THOR will continue to strive to have its suppliers put forth a reasonable effort to track the Conflict Minerals through their supply chains and provide THOR with the information necessary to comply with the Conflict Mineral reporting requirements.

As this is an ongoing process, THOR will continue to evaluate our policy and methods to ensure compliance with the SEC's Conflict Mineral reporting requirements.