



## Conflict Mineral Policy

Champion Homes, Inc. is committed to sourcing materials from companies that share our values regarding human rights, ethics and environmental responsibility. On August 22, 2012, the final rule regarding sourcing of conflict minerals under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“the Dodd-Frank Act”) was approved by the U.S. Securities and Exchange Commission (“SEC”). Conflict minerals include columbite-tantalite (coltan; i.e., tantalum); cassiterite (i.e., tin); wolframite (i.e., tungsten); gold or their derivatives. The rule imposes reporting requirements on publicly traded companies subject to the SEC to annually report the presence of conflict minerals originating in the Democratic Republic of the Congo (“DRC”) or adjoining countries (“Covered Countries”) in the products they manufacture or contract to manufacture whereby the conflict minerals are necessary to the functionality or production of a product.

Champion Homes supports the humanitarian goal of the Dodd-Frank Act in ending the illegal trade of conflict minerals originating in the DRC.

Champion Homes is committed to:

- Avoiding the use of conflict minerals which directly or indirectly finance or benefit armed groups in the DRC or adjoining countries;
- Enabling transparency in our supplier relationships;
- Building responsible supplier relationships; and
- Minimizing the environmental and social footprint of our supply chain.

In order to meet these commitments, Champion Homes will:

- Utilize a vendor-sponsored platform to adhere to OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas for supply chain tracing, sourcing, and transparency;
- Routinely assess our suppliers’ compliance;
- Take any additional actions to assist our suppliers in complying with the Dodd-Frank Act or whatever further actions we deem necessary to meet our commitments

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