

Conflict Minerals Policy

On August 22, 2012, the U.S. Securities and Exchange Commission (“SEC”) approved the final rule regarding sourcing of Conflict Minerals under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. “Conflict Minerals” are defined as cassiterite, columbite-tantalite (coltan), gold, wolframite, and their derivatives, which are limited to tin, tantalum and tungsten. The Dodd-Frank Act and its related rules require publicly traded companies to disclose whether the products they manufacture or contract to manufacture contain Conflict Minerals that are sourced from mines, refiners or smelters in the Democratic Republic of the Congo region and nine adjoining countries (together, the “Covered Countries”) - a practice which has been found to contribute to the severe abuse of human rights.

Malibu Boats, Inc. ("Malibu"), and all of our operating divisions and business units, supports the humanitarian goal of ending the violence and human rights violations in the Covered Countries, which is widely believed to be financed with the exploitation and trade of Conflict Minerals.

Malibu is committed to eliminating the use of Conflict Minerals that originate from mines controlled by non-governmental groups in the Covered Countries, who contribute to human rights abuses including human trafficking, inhumane treatment, forced labor, child labor, war crimes or crimes against humanity. Malibu is committed to sourcing materials from companies that share our values around human rights, ethics and environmental responsibility and endeavors to work with its suppliers to increase transparency regarding the origin of minerals contained in our products by requiring suppliers to comply with Malibu's Supplier Code of Conduct, which includes requirements relating to Conflict Minerals and responsible sourcing.

Malibu is committed to complying with 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. In this regard, we will continue to carry out a reasonable country of origin inquiry and will perform supply chain due diligence on our suppliers that provide products to be used in our manufacturing process to identify whether any of the products supplied to Malibu contain Conflict Minerals sourced from the Covered Countries. On an annual basis, each affected supplier to Malibu will be required to provide a completed Responsible Minerals Initiative Conflict Minerals Reporting Template (CMRT) to communicate Conflict Minerals data (including smelter data). We are committed to the proactive elimination of conflict minerals from products and the supply chain and ask our suppliers to cooperate with us in our efforts toward procurement of non-conflict minerals.

Malibu is taking and will continue to take the following due diligence steps conducted to further mitigate any risk that the Conflict Minerals contained in the products manufactured or contracted for manufacture by Malibu could directly or indirectly benefit or finance armed groups in the Covered Countries:

- including a conflict minerals clause in all new and renewing supplier contracts;
- continuing to drive our suppliers to obtain current, accurate, and complete information about the smelters in their supply chain;
- continuing to work with our suppliers to encourage the removal of any high risk smelters;
- evaluating ongoing supplier relationships with those suppliers that do not comply with our conflict minerals policy;
- engaging smelters sourcing from the Covered Countries to become audited and certified to a protocol recognized by the Responsible Minerals Assurance Process; and
- following up on any smelters requiring risk mitigation, but not removal from Malibu’s supply chain.

For more information regarding Malibu's conflict minerals program, contact us at:
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