



AMERICAN RAILCAR INDUSTRIES, INC.

Conflict Minerals Policy Statement

In 2010, Congress enacted the conflict minerals provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”) to address the exploitation and trade of certain minerals which contribute to violence and human rights abuses in the Democratic Republic of the Congo (the “DRC”) and its neighboring countries. On August 22, 2012, the U.S. Securities and Exchange Commission (the “SEC”) adopted final rules implementing the conflict minerals provisions of the Dodd-Frank Act (the “Conflict Minerals Rules”), which require public companies for which “Conflict Minerals” are necessary to the functionality or production of one or more products that it manufactures or contracts to manufacture to investigate their supply chain in an effort to determine whether those Conflict Minerals originated in any of the Covered Countries and, if so, information about the source and chain of custody of those Conflict Minerals. Such companies are then required to provide an annual disclosure on the results and/or process of that investigation. The “Conflict Minerals” for the purposes of the Conflict Minerals Rules are gold, columbite-tantalite (coltan), cassiterite, and wolframite (including their derivatives, tantalum, tin and tungsten, and the U.S. Secretary of State may designate other minerals in the future). The “Covered Countries” for the purposes of the Conflict Minerals Rules are the DRC, the Republic of the Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola. For additional details, please review the final Conflict Minerals Rules, available at: <http://www.sec.gov/rules/final/2012/34-67716.pdf>.

American Railcar Industries, Inc. (“ARI”) supports the Conflict Minerals Rules’ objective to end violence, human rights violations and environmental devastation in the Covered Countries. ARI is committed to increasing supply chain transparency in order to identify the sources of Conflict Minerals as accurately as possible and working toward avoiding the use of Conflict Minerals that directly or indirectly finance conflict in the Covered Countries. ARI is encouraging its suppliers to adopt policies and procedures with respect to Conflict Minerals that will enable them to reasonably assure products supplied to ARI are DRC Conflict Free. For purposes of the Conflict Minerals Rules, “DRC Conflict Free” means that the product does not contain Conflict Minerals that directly or indirectly financed or benefitted armed groups in the Covered Countries.

In furtherance of this commitment, ARI has put procedures in place that enable it to review its manufacturing operations and survey its purchase and supply chain to identify product components, the composition of these components and trace any Conflict Minerals to their source of origin, with a goal of assuring that no Conflict Minerals are derived from sources that directly or indirectly finance or benefit armed groups in the Covered Countries.

ARI requires its suppliers to cooperate with and assist ARI in complying with all laws, rules, and regulations, including, where applicable, assisting ARI in any due diligence required in connection with ascertaining the composition of parts and components and determining the chain of custody and source of Conflict Minerals. ARI evaluates its relationship with its suppliers on an ongoing basis and reserves the right to evaluate the extent to which a supplier has failed to reasonably comply with this Policy. ARI may take any appropriate action, including terminating its relationship with a supplier, upon a determination that a supplier’s efforts to comply with this Policy are deficient.

Nothing in this Policy is intended to in any way grant any additional rights or expectations to any supplier, or in any way modify or otherwise limit ARI’s contractual or legal rights.

ARI’s employees, suppliers and other interested parties can contact ARI regarding this Policy as follows:

1. Write ARI: American Railcar Industries, Inc., 100 Clark Street, St. Charles, MO 63301
2. Call us at: (636) 940-6000

ARI's suppliers are encouraged to contact us if they wish to seek guidance on the application of this Policy.