Conflict Minerals Rule Policy

Policy Overview:

- Sleep Number Corporation ("Sleep Number") is committed to conducting business activities to the highest standards of ethics and social responsibility and providing our customers with ethicallysourced products.
- This policy helps Sleep Number comply with Section 1502 of the Dodd Frank Act and its regulations, collectively known as the Conflict Minerals Rule ("Rule"), which requires publicly-traded companies like Sleep Number to report annually to the Securities and Exchange Commission whether any conflict minerals defined as tin, tantalum, tungsten, and gold ("3TG") that are necessary to the functionality or production of products they manufacture or contract to manufacture, originated from the Democratic Republic of the Congo or adjoining countries ("covered countries"). The Rule's reporting requirement is intended to encourage companies to procure minerals from sources that do not directly or indirectly finance or benefit armed groups operating in the covered countries, which control many of the region's mines or transit routes and have engaged in human rights violations fueled by the trade of 3TG.

Policy

Sleep Number does not directly source 3TG from mines, smelters or refiners, and is in most cases several production levels removed from them. Suppliers who provide ingredients, components, parts, or products ("Materials") to Sleep Number containing 3TG are expected to source them from ethically and socially responsible sub-tier suppliers and to undertake due diligence following a nationally or internationally recognized due diligence framework within their supply chains to determine the origin of the 3TG. Suppliers must annually certify whether the Materials supplied to Sleep Number in that calendar year contain conflict minerals and, if so, provide written evidence documenting their due diligence efforts and the source of each mineral.

Reasonable Country of Origin Inquiry and Due Diligence

Sleep Number performs a reasonable country of origin to determine if any 3TG necessary to the functionality and production of Sleep Number's products may have originated in the covered countries to meet the Rule's reporting requirement and report filing deadline of May 31. Sleep Number surveys all active suppliers about the presence of any 3TG in their Materials and performs due diligence on supplier responses to ensure accuracy or completeness and to obtain any additional information about or clarification of the sources and supply chain of any 3TG in Materials provided to Sleep Number.

The only valid copy of this policy is online. Once this policy is printed, it is considered obsolete.			
Functional Ownership Group:	Last Revision Date:	Review Interval:	Next Review Date:
Legal	July 15, 2019	2 years	July 15, 2021