



# WINNEBAGO INDUSTRIES

Be great, outdoors.

Supplier Code of Conduct





# WINNEBAGO INDUSTRIES

## Supplier Code of Conduct

Conducting ourselves with the highest degree of integrity, trust and respect includes an unwavering commitment to act in accordance with the law and the highest ethical standards, every moment of every day. This includes, but is not limited to, through our support for human rights principles embodied in the International Bill of Human Rights, the United Nations' Guiding Principles on Business and Human Rights, the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, and the Organization for Economic Co-Operation and Development (OECD) Guidelines for Multinational Enterprises.

We expect each of our business partners to share this commitment by always conducting themselves in this way. The standards for ethical conduct contained in this Supplier Code of Conduct formalize this expectation and apply to every third party representing us, performing work with or on behalf of us, or otherwise a direct or indirect part of our supply chain, including consultants, agents, partners, contractors, service providers and suppliers (each, a "Supplier"). Each of our Suppliers is expected to understand our Supplier Code of Conduct fully and to follow it at all times.

### Conducting Business with Integrity

Each Supplier is expected to conduct themselves with integrity at all times. This means not only acting in an honest, fair and ethical manner, but also acting in accordance with all applicable laws. Applicable laws include, but are not limited to, those relating to labor practices, health and safety, corruption and fair competition, insider trading and environmental protection.







### **HEALTH AND SAFETY PRACTICES**

The health and safety of our employees and those of our Suppliers is an absolute requirement. Suppliers are expected to maintain safe and secure facilities that meet or exceed all health, safety and environmental laws and regulations. We all have a shared responsibility to maintain safe, healthy and environmentally friendly workplaces for our employees.

### **RESPECTFUL WORK ENVIRONMENT**

Suppliers are expected to maintain a positive work environment, free of harassment and discrimination, where every employee is respected, included and valued. Harassment and discrimination of any kind are inconsistent with our values of fairness and respect for each other and are not tolerated at Winnebago Industries or at our Suppliers.

### **DIVERSITY, EQUITY AND INCLUSION**

We encourage our Suppliers to strive for a culture that embraces diversity, equity and inclusion; a culture where all people feel valued and have a sense of belonging. Suppliers must be committed to providing equal employment opportunities for all employees and job applicants, and to hiring, training, compensating and promoting their employees based on their merits and without regard to their ethnicity, race, color, gender, sexual orientation, gender identity, religion, nationality, age, disability, or any other status protected by law. We strive to partner with Suppliers who share this commitment to diversity, equity and inclusion and seek to expand our partnership with Minority-Owned Businesses (MBE), Women-Owned Businesses (WBE) and Veteran-Owned Businesses (VBE).

### **FAIR LABOR PRACTICES**

We respect the human rights and dignity of all persons, and condemn in the strongest terms forced labor, human trafficking and underage labor. Suppliers are expected to share this commitment and to under no circumstances use child or forced labor in any form. Any use of child or forced labor will result in immediate Supplier disqualification. Suppliers are expected to promote a fair and competitive work environment and to provide employees with compensation and benefits that are fair and equitable for the type of work performed, the skills and experience of the employee, and the geographic location where the work is being performed, in amounts no less than those required by law (including minimum wages and overtime). Suppliers are also expected to fully comply with all laws and regulations governing working times and conditions in the locations in which business is conducted.

### **FREEDOM OF ASSOCIATION**

We expect our Suppliers to share our commitment to complying with laws regarding freedom of association and to respect rights of employees related to collective bargaining.





## DESIGNING AND SELLING SAFE, HIGH-QUALITY PRODUCTS

To enable extraordinary outdoor lifestyle experiences for our customers, we must provide them with safe products of the highest quality. Each Supplier is expected to ensure that all product-related goods and services support product quality and safety and are compliant with all applicable manufacturing codes, standards and safety requirements, and to promptly notify us if they become aware of any practice or process that could threaten product quality or safety.

## GLOBAL TRADE AND FAIR COMPETITION

### Anti-Corruption

Corruption is contrary to our values of integrity, trust and respect, and undermines our legacy and reputation as a trusted leader in outdoor lifestyle solutions. We succeed on the basis of our people, products and services, not on corrupt actions. Suppliers must never provide or offer any form of bribe or illegal payment. Regardless of where Suppliers conduct business, Suppliers shall at all times comply with applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act as well as any applicable anti-corruption rules and laws in foreign jurisdictions. Similarly, Suppliers should ensure that any fees, discounts, commissions, or other payments made are always documented in writing and reflect the actual value of the service provided.

### Practicing Free and Fair Competition

Antitrust and competition laws promote open and fair competition and ensure that all businesses have a level playing field. Suppliers are expected to honor the level playing field of free and fair competition and to uphold these laws fully.

### Imports

Suppliers transporting goods into the United States in connection with Winnebago Industries products shall comply with all applicable customs and trade laws and regulations, including those enforced by the United States Customs and Border Protection, as well as Customs Trade Partnership Against Terrorism (CTPAT) security procedures.





## ENVIRONMENTAL RESPONSIBILITY

**Sustainability** As an outdoor lifestyle company, we are deeply committed to the principle that a clean environment is a fundamental right for our customers, employees, communities, and other stakeholders. This, and other human rights, such as the right to safe drinking water, are impacted by our operations and the operations of our Suppliers. We expect our Suppliers to honor the environment and related human rights by minimizing the environmental impact of their businesses and to implement environmentally sustainable strategies for the future.

**Air Emissions** Suppliers are expected to characterize, monitor, control and treat all air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations as required prior to discharge or disposal.

**Wastewater and Solid Waste Emissions** Suppliers are also expected to monitor, control and treat all wastewater and solid waste generated from operations, industrial processes and sanitation facilities as required prior to discharge or disposal.

## AUDITS/INSPECTIONS

We reserve the right to verify compliance with this Supplier Code of Conduct through various assessment mechanisms, including self-assessment questionnaires, worker well-being surveys, and audits of Suppliers' facilities, operations, books and records. These audits may be performed by Winnebago Industries or an independent third party and may relate to any facility that participates in the manufacturing of products for Winnebago Industries, including facilities used by subcontractors of our Suppliers. Such audits shall be during normal business hours and with reasonable advance notice. Each Supplier agrees to require that the facility's management provide complete facility access and reasonable cooperation to allow for a comprehensive audit to be conducted. Upon review of any unsatisfactory audit results, we, in our sole discretion, may terminate our relationship with a Supplier or facility, cancel a purchase order, return or revoke acceptance of affected goods, or require corrective action be taken.





## CONFLICTS OF INTEREST

Suppliers must disclose the existence of any actual or potential conflicts of interest with Winnebago Industries and shall avoid any actual or perceived conflicts.

Conflicts of interest may include, but are not limited to, the following:

**Gifts, Meals and Entertainment** Suppliers shall not offer gifts, meals, entertainment, or any other benefits to our employees if it would influence or appear to influence their business judgment. Generally, this means not providing such benefits unless they are of modest value, infrequent, consistent with accepted business practice, not excessive, business-related (including to further a business relationship), and permitted under applicable law.

**Related-Persons Transactions** Suppliers must disclose any relationships with the Company's employees or their family members. These must be generally avoided and can proceed only if approved in writing by the Company.

## PROTECTING COMPANY ASSETS

**Confidential and Proprietary Information** Our confidential and proprietary information is critical to maintaining our legacy of success in the outdoor lifestyle area, and disclosure of such information can seriously damage our interests. Suppliers in the possession of our confidential information must carefully handle such information and share it outside of the Company only as necessary and only with authorization. Suppliers are expected to collect and maintain information in compliance with applicable laws and regulations, including data privacy regulations, wherever they do business. Suppliers each are expected to use Winnebago confidential information only for legitimate business purposes in accordance with applicable law.

**Intellectual Property** Developing innovative and differentiated solutions is necessary to being a leader in the outdoor lifestyle space and respecting the Intellectual Property rights of others is necessary to conducting ourselves with integrity. Suppliers are therefore expected not only to support our innovation efforts, but are expected to respect the valid Intellectual Property rights of third parties.



# WINNEBAGO INDUSTRIES

## Supplier Code of Conduct

All Suppliers of the Winnebago Industries family of companies have an obligation to promptly report any suspected violations of this Supplier Code of Conduct.

Reports can be made in person with our legal department, or anonymously by calling the **Winnebago Industries Ethics Hotline at 844-418-7596**

The Hotline is available at all times and is managed by an independent third party.

