



## Human Rights Policy

### Our Commitment: Respecting Human Rights

Conducting ourselves with the highest degree of integrity, trust and respect includes an unwavering commitment to uphold and promote fundamental human rights, every moment of every day. Our Human Rights Policy (the "Policy") describes this commitment.

We believe in the inherent dignity of every person and are committed to conducting our business in a manner that respects all fundamental human rights. This includes, but is not limited to, support for human rights principles embodied in the International Bill of Human Rights (consisting of the United Nations' Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural 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.

Our Policy aligns with the commitments and expectations set forth in our Code of Conduct, which can be found on our website at [www.winnebagoind.com](http://www.winnebagoind.com) (select "Company", "Investor Relations", and "Corporate Governance"). We also maintain workplace policies and practices that provide further guidance on many of the commitments described in this Policy, including policies on a safe and healthy workplace, respectful work environment, diversity and inclusion, and fair labor practices.

### Human Rights in the Workplace and Labor Practices

As a manufacturer, our commitment to human rights begins with our workplaces and labor practices, as described below.

#### Safe and Healthy Workplace

The health and safety of our employees and other stakeholders is our top priority. At each of our locations, we consistently strive to maintain safe and secure facilities that meet or exceed all health and safety laws and regulations.

#### Respectful Work Environment

We are committed to maintaining a positive work environment, free of harassment and discrimination, where every employee is respected, included and valued. Offensive conduct, harassment and



discrimination of any kind are inconsistent with our values of fairness and respect for each other, and are not tolerated.

## **Diversity and Inclusion**

We strive for a culture that embraces diversity, equity and inclusion; a culture where all people feel valued and a sense of belonging. Our team is passionate about fulfilling our purpose and helping our customers experience the outdoor lifestyle, and we strive to fuel that passion and empower our employees to reach their highest potential by providing an inclusive and engaging workplace.

We are committed to providing equal employment opportunities, which means that we hire, train, compensate and promote our 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.

## **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. We follow applicable labor laws and do not tolerate any such practices by our employees, agents or business partners.

We also strive 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. We work to ensure full compliance with all wage and hours laws in the locations in which we operate.

## **Freedom of Association**

We are committed to complying with laws regarding freedom of association and respect rights of employees related to collective bargaining. We strive to be the employer of choice in our industry and to maintain a world-class relationship with our employees.

## **Environment**

As an outdoor lifestyle company, we recognize the immense value that a clean environment provides to our customers, employees, communities, and other stakeholders, and we appreciate that certain human rights, such as the right to safe drinking water, are connected to the environment.

We strive to honor the environment and related human rights by minimizing the environmental impact of our business and by working to implement environmentally sustainable strategies for the future.

## **Expectations for Employees and Partners**

The standards for ethical conduct set forth in this Policy and in our Code of Conduct, which further describes our commitment to ethical behavior, apply to every person in the Winnebago Industries family of companies, regardless of position or geographic location. This includes all employees, officers and



members of the Board of Directors. Third parties 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 and suppliers, are expected to uphold the principles and standards contained in this Policy and to share our commitment to honoring fundamental Human Rights as well.

## Monitoring and Reporting Human Rights Violations

### Reporting Violations

All members of the Winnebago Industries family of companies, as well as all third parties representing us, have an obligation to promptly report any suspected Human Rights violations, including violations of this Policy. There are a number of options for reporting violations.

#### **Make a Report in Person**

Reports can always be made in person. Employees and third parties can speak with the Company's legal department or local human resources representative to submit a report.

#### **Call the Winnebago Ethics Hotline**

Another reporting option is to call the Company's Ethics Hotline, available at 844-418-7596. The Hotline is available at all times and is managed by an independent third party. A trained representative receives all submitted reports and provides them to the Company for investigation. Each incident report is assigned a reference number that allows callers to provide additional information or check on its status at any time.

#### **Submit an Online Report**

Those governed by this Policy also have the option to submit an online report on our external, secure third-party site managed by EthicsPoint, available at <http://winnebagoind.ethicspoint.com>.

Those wishing to submit a report may do so anonymously by using the Ethics Hotline or Online Report.

### Investigating Reports and Prohibiting Retaliation

We take very seriously all reports of Human Rights violations and will fully investigate each report made. If it is determined that a violation has occurred, we will take appropriate action, up to and including termination of employment or business relationship.

We do not tolerate retaliation for reporting suspected violations that are made in good faith, regardless of whether or not the report is found to be correct or results in corrective action. If someone has taken action against you as a result of making a report or cooperating with an investigation, report it immediately to the Company's human resources or legal departments.



## Policy Development, Oversight and Interpretation

Our Policy was developed through cross-functional collaboration at the Company that considered best practices across our peer companies and guidance provided by the United Nations Global Compact. This Policy is intended to be reviewed annually and updated periodically as needed to ensure that it remains consistent with the Company's unwavering commitment to uphold fundamental human rights.

Ultimate oversight of this Policy rests with the Company's Board of Directors, including the Chief Executive Officer. The Company's legal and human resources departments, led by our Vice President, General Counsel and Secretary and Vice President of Human Resources, respectively, oversee the implementation of this Policy on a daily basis.

Questions regarding interpretation of this Policy and related workplace policies and practices should be first directed to the Company's human resources or legal departments.

## Policy Implementation

We strive to honor and uphold the commitments set forth in this Policy in collaboration with our stakeholders, each and every day. We do this by:

- Monitoring our operations for potential violations and holding our employees accountable
- Providing reporting mechanisms and promptly addressing any allegations of human rights violations at the Company
- Conducting relevant human rights training, including the annual training of each employee on our Code of Conduct and annual certification of compliance
- Reporting on the work that we are doing to meet our human rights responsibilities, including in periodic reports to our Board of Directors and in our annual Corporate Responsibility Report to our shareholders and the public
- Maintaining and regularly updating clear and accessible policies relating to human rights
- Proactively engaging with our shareholders to obtain input and evolve our approach over time

