

WINNEBAGO INDUSTRIES	Policy
Title: Whistleblowing and Non-Retaliation Policy	Doc ID: LEG-016
Owner: Legal	Revision: A

Purpose

Winnebago Industries, Inc. and its affiliates (together, the “Company”) are committed to maintaining a culture of integrity, transparency and accountability. To support this commitment, the Company has established a Whistleblowing and Non-Retaliation Policy. This Policy provides employees, contractors and other stakeholders with clear and accessible channels to report suspected violations of laws, regulations and policies as well as any unethical behavior, including those relating to the accuracy of our financial statements and accounting practices, and ensures protection from retaliation for those who report such concerns in good faith.

Scope

This Policy applies to all employees, contractors and other stakeholders of the Company.

Policy Statement

Reporting Process

Employees and contractors are responsible for notifying the Company if they become aware of any potential violations of laws, regulations or policies or any unethical behavior, including those relating to the accuracy of our financial statements and accounting practices. By reporting concerns, individuals actively contribute to cultivating a culture of integrity and upholding the Company’s values.

Reports may be made through the following channels:

Company Manager

Employees are encouraged to report concerns to their immediate supervisor or manager, who will then escalate the matter to the appropriate department for investigation.

Whistleblower Hotline

Individuals may report concerns 24/7 through a toll-free number (1-844-418-7596) or an online platform managed by an independent third-party provider (www.winnebagoind.ethicspoint.com). Reporting individuals have the option to remain anonymous and will be given a unique reference number.

Human Resources Department

Reports may be made directly to any manager, director or vice president within the Human Resources Department through in-person meetings or written communication.

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Legal Department

Reports may be made directly to any attorney within the Company’s Legal Department through in-person meetings or written communication.

Individuals are encouraged to provide comprehensive details about the concern, including the nature of the concern, parties involved, relevant dates, and any supporting documentation. All reporting avenues will be available in multiple languages as reasonably necessary to ensure accessibility.

Report Investigation

The Company’s Chief Compliance Officer will conduct an initial review and, if appropriate, refer a report to the appropriate department for investigation and resolution. All investigations are confidential as described further below and shall be conducted in a thorough, impartial and prompt manner. The investigating department shall engage relevant internal departments and external experts as required.

Investigation of reports will be prioritized based on the severity of the allegations, and in cases where the safety of individuals is at risk, appropriate resources will be notified immediately to implement relevant safety protocols.

Communication and Feedback

Once the investigation has concluded, the reporting individual will be informed of the conclusion of the investigation. Communications to reporting individuals will be subject to confidentiality and legal constraints as needed to preserve the integrity of the investigation process.

Accountability and Transparency

All reports, correspondence, and investigation outcomes will be documented and securely stored. Reports and investigation outcomes will be communicated to appropriate members of senior management and the Board of Directors, ensuring transparency and accountability. Company leadership will be provided with meaningful metrics and trend analyses to enable proper oversight of the whistleblower process. Investigations will be periodically audited to ensure compliance with this Policy.

Confidentiality and Non-Retaliation

The Company understands the importance of confidentiality in encouraging open reporting. All parties involved in the investigation of a report will maintain the confidentiality of all investigation-related information, including the identity of the whistleblower and investigation participants, to the fullest extent possible while still allowing for a thorough investigation.

The Company is dedicated to protecting whistleblowers from any form of retaliation. No person shall suffer harassment, retaliation, or adverse employment consequences for submitting a report in good faith. Retaliation against individuals who report concerns in good faith or participate in investigations is strictly prohibited and will result in disciplinary action, up to and including termination.

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Definitions

Term or Acronym	Definition
Company	Winnebago Industries, Inc. and its affiliates

Document Approvals

Approver Name	Approver Title	Approval Date
Stacy Bogart	SVP, General Counsel, Secretary and Corporate Responsibility	October 15, 2024
Cory Nelson	VP, Chief Compliance Officer	October 15, 2024

Revision History

Revision #	Change Notes
A	Initial revision