



WHISTLEBLOWER AND ANTI-RETALIATION POLICY

Compliance-COMP003-1
Page 1

Contents

Policy Statement: 2

Accountability – Policy Owner and Sponsor(s): 2

Scope: 2

Standards for Policy Implementation: 2

- 1) Process for Reporting 2
- 2) Process for Handling of Reports 3
- 3) Immediate Escalation 4
- 4) Remediation..... 5
- 5) Confidentiality 5
- 6) Good Faith Reporting..... 6
- 7) Cooperation with Investigations 6
- 8) Retaliation Prohibited 6
- 9) Records Retention 6

Relevant Policies and Procedures: 6

Compliance Expectations: 7

Revisions Log 7



WHISTLEBLOWER AND ANTI-RETALIATION POLICY

Compliance-COMP003-1
Page 2

Policy Statement:

Cavco Industries, Inc.’s (Cavco) Whistleblower and Anti-Retaliation Policy (“Policy”) is designed, in conjunction with Cavco’s Code of Business Conduct and Ethics (“Code”) and related policies, to encourage and enable Cavco employees and its business partners, customers, contractors, and other stakeholders to raise any concerns about illegal or unethical behavior without fear of retaliation or other adverse consequences for reports made in good faith.

Accountability – Policy Owner and Sponsor(s):

Policy Owner ¹	Chief Compliance Officer
Policy Sponsor(s) ²	Chief Executive Officer

Scope:

This Policy applies to all Cavco employees, suppliers, contractors, or interested members of the public who have concerns about potential illegal or unethical behavior in conjunction with Cavco’s operations.

Standards for Policy Implementation:

1) Process for Reporting

- a) Employment or workplace related issues should be made through the confidential and anonymous Cavco Compliance & Ethics Hotline at **1-844-93CAVCO (1-844-932-2826)**.
- b) Anonymous and confidential reports may also be made:
 - at the website: www.speakupcavco.com
 - via SMS text at **(602)-786-8683; or**
 - by email at **cavco.compliance@cavco.com**

¹ The “Policy Owner” is responsible for ensuring that the standards are adequately drafted to achieve the policy’s statement; that communication, risk mitigation, and monitoring expectations are adequately defined; and that an annual review of the policy is completed.

² The Policy Sponsor(s) is specifically accountable for overseeing and validating the adequacy of policy statement and reviewing the adequacy of the standards.



WHISTLEBLOWER AND ANTI-RETALIATION POLICY

Compliance-COMP003-1
Page 3

2) Process for Handling of Reports

- a) Cavco has established a third-party, independently administered reporting telephone number, online web portal, and SMS (texting) platform to allow employees to anonymously communicate good faith complaints or reports relating to their workplace and conditions of employment.
 - i) The telephone number, online portal, and SMS (texting) reporting platforms will allow employees to maintain anonymity and exchange information with Cavco.
 - ii) Cavco will not take any steps to identify a reporter who wishes to remain anonymous.
- b) After a complaint or report is received through the Hotline, website, or SMS text, the appropriate team will be assigned to conduct an investigation. The investigation will be conducted pursuant to the separate Cavco Investigations Policy (COMP003-2).

Although it is not a comprehensive list, the following categories of complaints will be reviewed and investigated by the appropriate Cavco corporate team identified below:

Human Resources³:

- Harassment
- Substance Abuse
- Discrimination
- Verbal or physical conduct creating a hostile environment
- Interference with another employee's productivity
- Conduct that threatens the safety of another employee
- Unfair labor practices
- Privacy and disclosure of private information
- Gifts and entertainment

Internal Audit⁴:

- Financial Fraud
- Theft or embezzlement
- Misappropriation of company assets
- Destruction of business records
- Forging, altering, or creating falsified business records
- Falsification or omissions in accounting records
- Money laundering

³ If a complaint involves a member of the Human Resources Department, the Legal Department will control the investigation.

⁴ If a complaint involves a member of the Internal Audit Department, the Legal Department will control the investigation.



WHISTLEBLOWER AND ANTI-RETALIATION POLICY

Compliance-COMP003-1
Page 4

Legal⁵:

Illegal conduct
Any Conduct listed above involving senior management or Board members
Unethical conduct in violation of the Code
Hindering the conduct of an investigation
Antitrust matters
Securities law violations
Bribery and transactions with government entities
Conflicts of interest
Protection of intellectual property

- c) At times, it may be appropriate to hire an outside investigator or contact law enforcement personnel to conduct an investigation into any of the above areas. As necessary, the Cavco Legal Department and/or the Chief Compliance Officer will select and engage the appropriate outside investigator.
- d) Additionally, the Legal Department may assume primary responsibility for certain investigations and oversee other Cavco personnel. In such cases, the assigned investigator(s) will follow legal counsels' instructions relating to communications and evidence in order to preserve the attorney-client and attorney work product privileges.

3) Immediate Escalation

- a) Certain potentially significant and serious non-compliance matters such as those listed below must be reported immediately to the Chief Compliance Officer (CCO). If the CCO is not available, such matters should be reported to the CEO.
- b) Although such serious matters cannot be defined or identified with absolute precision, they include those that: (i) involve alleged violations of law or the Code of Conduct that would result in serious harm to individuals or the company or significant civil or criminal penalties; or (ii) could undermine the effectiveness of Cavco's compliance program. Examples of significant and serious allegations that must be reported immediately include, but are not limited to, the following:

Issues involving Board members or senior executives

- An allegation of non-compliance or conflict of interest by a senior executive or Board member.
- A matter involving accounting, internal accounting controls or auditing issues that may require reporting to the Audit Committee.
- Allegations involving potential illegal or improper conduct by senior management or Board members

⁵ If a complaint involves a member of the Legal Department, the CEO will assign an appropriate internal or external resource to conduct an investigation.



WHISTLEBLOWER AND ANTI-RETALIATION POLICY

Compliance-COMP003-1
Page 5

Issues with significant financial implications

- An allegation that could attract media attention or otherwise seriously damage Cavco's reputation.
- A matter that could have a material effect on share price.
- A matter that could lead to de-listing from the stock exchange.

Issues involving potential criminal activity

- A matter involving potential corporate criminal liability and/or a serious risk of individual criminal liability and/or prosecution.
- A matter that could result in suspension or debarment by a government, loss of license to operate in a specific area or line of business or other governmental or regulatory privileges.
- Allegations of obstruction of justice or interference with any investigation.
- Allegations of patterns of significant non-compliance concerning workplace safety, disability, product safety, harassment, or discrimination.

Issues involving compliance with Cavco's own policies

- An allegation of retaliation against someone for raising concerns or asking questions about the Code or a compliance and ethics issue.
- An allegation that has been brought to the attention of a General Manager, a Regional Vice President, or other senior officer at the same or a higher level that has not been acted upon within a reasonable period of time.

Issues involving physical harm to others

- Significant instances of workplace violence.
- Allegations of threats made toward the company or its employees.

4) Remediation

- a) Following an investigation into a complaint or report, Cavco will take any prompt corrective action it deems appropriate and necessary and in the best interests of Cavco, its employees, and its shareholders.

5) Confidentiality

- a) Consistent with applicable law and the need to conduct a complete and fair investigation, every effort will be made to ensure the confidentiality of all reports.

Cavco will not release any investigative files, documents, notes or recordings including interviews and findings, unless authorized in writing by the CCO or Legal Department.



WHISTLEBLOWER AND ANTI-RETALIATION POLICY

Compliance-COMP003-1
Page 6

6) Good Faith Reporting

- a) Anyone filing a report or concern must do so in good faith and with a reasonable belief that a violation of law or Cavco policy has occurred, although it is not required that a violation be confirmed by the resulting investigation.
- b) Knowingly false, malicious, or retaliatory complaints or reports are a violation of Cavco policy and are subject to employee discipline, up to and including termination.

7) Cooperation with Investigations

- a) All employees are required to cooperate during any internal investigation under Cavco Code and related policies.
- b) Any employee who refuses to cooperate with an investigation may be subject to employee discipline, up to and including termination.

8) Retaliation Prohibited

- a) Cavco does not tolerate any interference with, or retaliation against, any employee who submits a complaint, participates in investigation, or reports in good faith. Forms of retaliation may include, but are not limited to, false reciprocal reporting, discharge, demotion, reduction in job duties or authority, threats, harassment, suspension, reduction in hours, or pay decrease. Any employee who believes they are being retaliated against should follow one of the above procedures for making a report. Any employee who is found to have retaliated against another employee for making a good faith report will be subject to discipline, up to and including termination.

9) Records Retention

- a) The Compliance Department will maintain all records of reports and complaints pursuant to the Cavco record retention policy.

Relevant Policies and Procedures:

Applicable Standard(s)	Policy and Procedure References	Procedure Owner ⁶
	Investigations Policy (COMP003-1)	

⁶ The Procedure Owner is accountable for ensuring that procedures adhere to the standards both in design and actual day to day implementation of the procedures.



WHISTLEBLOWER AND ANTI-RETALIATION POLICY

Compliance-COMP003-1
Page 7

Compliance Expectations:

Every employee, vendor, and contractor has a duty to report non-compliance with any Cavco Policy and all are afforded protection under Cavco’s Whistleblower Anti-Retaliation Policy. Non-Compliance with this policy may result in disciplinary action up to and including termination of employment, termination of contracts, and/or disbaring from further business or affiliation with Cavco Industries and/or subsidiaries.

Revisions Log

Date	Change / Reason for Change
12/19/2019	Initial Publication of Policy and Standards