



# WHISTLEBLOWER AND ANTI-RETALIATION POLICY

Compliance-COMP003-01-07/02/2024  
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 ..... 3

    4) Remediation..... 4

    5) Confidentiality ..... 4

    6) Good Faith Reporting..... 4

    7) Cooperation with Investigations ..... 4

    8) Retaliation Prohibited ..... 4

    9) Records Retention ..... 5

Relevant Policies and Procedures: ..... 5

Compliance Expectations: ..... 5

Revisions Log ..... 5



# WHISTLEBLOWER AND ANTI-RETALIATION POLICY

Compliance-COMP003-01-07/02/2024  
Page 2

## Policy Statement:

Cavco Industries, Inc.’s (Cavco) Whistleblower and Anti-Retaliation Policy (“Policy”) is designed, in conjunction with Cavco’s Code of Conduct (“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 <sup>1</sup>	Chief Compliance Officer
Policy Sponsor(s) <sup>2</sup>	Chief Executive Officer

## Scope:

This Policy applies to all Cavco (and subsidiary) 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

There are several ways concerns may be reported:

- a) A concern can be brought to the attention of the employee’s manager or supervisor, or any manager or supervisor;
- b) A concern can be brought to the attention of the on-site or corporate Human Resources team;
- c) A concern can be reported directly to the Compliance Department by emailing [cavcompliance@cavco.com](mailto:cavcompliance@cavco.com);
- d) A concern can be reported through the SpeakUp Cavco Hotline
  - i) At **1-844-93CAVCO (1-844-932-2826)**, or
  - ii) At the website: [www.speakupcavco.com](http://www.speakupcavco.com), or
  - iii) Via SMS text at **(602)-786-8683**

<sup>1</sup> 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.

<sup>2</sup> 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-COMP003-01-07/02/2024  
Page 3

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### 2) Process for Handling of Reports

Cavco has established a third-party, independently administered reporting telephone number, online web portal, and SMS (texting) platform to allow employees to communicate good faith reports relating to their workplace and conditions of employment. The telephone number, online portal, and SMS (texting) reporting platforms will allow employees to maintain anonymity and exchange information with Cavco. Although available, reporting anonymously may hinder Cavco from following up, gathering more information from, or sharing outcomes with the reporting employee; thus encumbering Cavco's ability to perform a prompt and thorough investigation.

After a report is received, the appropriate team will be assigned to conduct an investigation. The investigation will be conducted pursuant to the separate Cavco Investigations Policy (COMP003-2).

At times, it may be appropriate to hire an outside investigator or contact law enforcement personnel to conduct an investigation. As necessary, the Cavco Legal Department and/or the Chief Compliance Officer will select and engage the appropriate outside investigator.

### 3) Immediate Escalation

Certain potentially significant and serious non-compliance matters such as those listed below must be reported immediately to the General Counsel (GC). If the GC is not available, such matters should be reported to the CEO.

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

#### 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.



## WHISTLEBLOWER AND ANTI-RETALIATION POLICY

Compliance-COMP003-01-07/02/2024  
Page 4

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### 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.

#### 4) Remediation

Following an investigation into a 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

Consistent with applicable law and the need to conduct a complete and fair investigation, reasonable 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 Legal Department.

#### 6) Good Faith Reporting

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.

Knowingly false, malicious, exaggerated, or retaliatory reports are a violation of Cavco policy and are subject to employee discipline, up to and including termination.

#### 7) Cooperation with Investigations

All employees are required to cooperate during any internal investigation under our Code of Conduct and related policies.

Any employee who refuses to cooperate with an investigation may be subject to employee discipline, up to and including termination.

#### 8) Retaliation Prohibited

Cavco does not tolerate any interference with, or retaliation against, any employee who submits a concern, participates in an 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



# WHISTLEBLOWER AND ANTI-RETALIATION POLICY

Compliance-COMP003-01-07/02/2024  
Page 5

employee for making a good faith report will be subject to discipline, up to and including termination.

### 9) Records Retention

The Compliance Department will maintain all records of reports made to the Department and through the SpeakUp Cavco Hotline, pursuant to the Cavco Record Retention Policy.

### Relevant Policies and Procedures:

Applicable Standard(s)	Policy and Procedure References	Procedure Owner <sup>3</sup>
	Investigations Policy (COMP002)	

### 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
02/23/2021	Updated the reporting process sequence and cleaned up language throughout
07/02/2024	Review and reauthorization of the policy

<sup>3</sup> 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.

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Cavco Industries, Inc. and Applicable Subsidiaries

All Questions, Concerns, and Instances of Non-Compliance with this Policy Should be Immediately Forwarded to a Supervisor, the Chief Compliance Officer or the Ethics & Compliance Hotline: 1-844-93CAVCO (1-844-932-2826)