

LCI Italy S.r.l.

Whistleblower Policy

The Company's Guidelines for Business Conduct require directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The "**Company**" includes LCI Italy S.r.l. and its Italian subsidiary, namely Ke-Star S.r.l. All directors, officers and employees of the Company must practice honesty and integrity in fulfilling their responsibilities and must comply with all applicable laws and regulations. Therefore, this Whistleblower Policy – which comes into force upon publication subject to Section 11 – has been prepared, which sets out the applicable laws and regulations.

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1. General

The purpose of this Whistleblower Policy is to set forth the policies and procedures established by the Audit Committee of the Board of Directors of LCI Industries, the ultimate parent entity of the Company (the “**Ultimate Parent**”), as amended to reflect the specific rules and regulations applicable to the Company for reports made by employees and other stakeholders (such as collaborators, business partners and third parties) of the Company, on a confidential and (if desired) an anonymous basis, regarding (each of these reports is a “**Report**”, and the act of making a Report, is considered “**Reporting**” or “**Reported**”, as applicable, and a person who makes a Report, is considered a “**Reporter**”):

- an “**Abuse**”, which is defined as:
 - i. a violation or risk of violation of European Union law (“**Union law**”). A violation of Union Law is an act or omission that (i) is unlawful and relates to Union acts and specific policy areas falling within the scope of the European Directive (2019/1937) (“**Directive**”), such as, for example, protection of the environment or privacy and personal data, or (ii) undermines the purpose or application of the rules covered by Union acts and the policy areas which fall within the scope of the Directive. The entire list of breaches falling within the scope of the Directive can be consulted in Article 2 of the Directive; or
 - ii. a violation or risk of violation of Italian acts indicated in the Annex to the Legislative Decree 24/2023 (of implementation in Italy of the EU Directive 2019/1937) or of the national acts constituting implementation of the acts of the European Union indicated in the Annex to the Directive (EU) 2019/1937, relating to the following areas: public procurement; financial services, products and markets and prevention of money laundering and financing of terrorism; safety and compliance of products; transportation safety; environmental protection; radiation protection and nuclear safety; food and feed and animal health and welfare; public health; consumer protection; protection of privacy and protection of personal data and security of networks and information systems; or
 - iii. any acts or omissions affecting the financial interests of the European Union, or acts or omission concerning the internal market and jeopardizes the free movement of goods, persons, services and capital or constitutes a violation of the Union's competition and state aid rules, corporate tax and mechanisms whose purpose is to obtain a tax advantage that frustrates the object or purpose of the applicable corporate tax law; or
 - iv. administrative, accounting, civil or criminal offences, where not already included in the cases under (i), (ii) and (iii); or
 - v. relevant offenses under Legislative Decree 231/2001 or violations of the Organization, Management and Control Model under Legislative Decree 231/2001 (“**Model 231**”), where not already included in the cases under

(i), (ii) and (iii);

- a “**Suspected Abuse**”, which is defined as the suspicion of a Reporter that within the organization in which he/she works or has worked, or at another organization, when he/she has come into contact with this organization through his/her work, an Abuse is taking place, insofar as the suspicion is based on reasonable grounds arising from the knowledge that the Reporter has acquired at the employer;
- receiving, recording, storing, and handling Reports received by the Company; and
- the protection of employees from retaliatory actions for Reporting.

2. Reports covered by this Whistleblower Policy

Reports should be made about violations of laws and other legal provisions and requirements within the meaning of Article 2 of the Italian Legislative Decree no.24/2023. Insofar as the improper acts or omissions to be Reported are not already covered by Article 2 of the Legislative Decree 24/2023, the following improper acts or omissions should also be Reported:

- fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
- fraud or deliberate error in the recording and maintenance of financial records of the Company;
- deficiencies in, or non-compliance with, the Company’s internal accounting controls;
- misrepresentation or false statement to or by a (senior) officer or accountant of the Company regarding any matters contained in the financial records or any financial or audit reports of the Company;
- deviation from full and fair reporting of the Company’s financial condition;
- substantial and specific threat to public health, environmental degradation or safety of persons;
- information, including reasonable suspicion, about actual or potential violations of applicable law or regulations applicable to the business activities of the Company, that have occurred or are reasonably likely to occur, including Union Law rules applicable to the Company;

- insider trading, or the dissemination of material non-public information;
- violation of any other standards set forth in the Guidelines for Business Conduct, Insider Trading Policy, Ethics Code or other policies adopted by the Company or adopted by any parent entity of the Company and applicable to the Company from time to time (collectively, the “**Applicable Policies**”); or
- altering, destroying or concealing a document, or attempting to do so, with the intention to restricting access to the documents for use in an official proceeding, or otherwise obstructing, influencing or impeding any official proceeding, in violation of any applicable law or regulation.

Note: Employment related matters, other than those described above, should continue to be reported through normal supervisory or Human Resource channels. For example, the Whistleblower Policy does not cover reports concerning labor disputes, discrimination between coworkers and interpersonal conflicts between the reporting person and another worker.

3. No Retaliation by internal or external reporting

Even though Reports may be made directly to the appropriate competent authorities, this Whistleblower Policy is intended to encourage and enable employees and other stakeholders to make Reports for investigation and appropriate action *within* the Company. With this goal in mind, no employee making a Report in good faith shall be subject to retaliation or adverse employment consequences because of such Report. This prohibition of retaliation includes any form of retaliation to a person Reporting a (Suspected) Abuse. In addition, no employee shall be adversely affected because he/she refused to carry out a directive which, in fact, constitutes corporate fraud or is a violation of any applicable law or regulation. A director, officer or employee who retaliates against someone who has made a Report in good faith is subject to discipline up to and including dismissal from their position or termination of employment.

The Company also prohibits retaliation for good faith filing, testifying, participating in, providing information to, or otherwise assisting in a proceeding or investigation related to a Report, including but not limited to any proceeding or investigation initiated by:

- a regulatory authority or a law enforcement agency (such as the Public Prosecutor (*in Italian*: “**Pubblico Ministero**”));
- any person with supervisory authority over a director, officer or employee; or
- any person with authority to investigate, disclose and/or terminate the activity of the Company which is the subject of the Report.

Examples of situations that constitute retaliation, where traceable to a whistleblowing, are given in Paragraph 4 of Article 17 of the Legislative Decree 24/2023. Acts of retaliation are null and

void.

The prohibition of retaliation and the same protection measures operating for the Reporter also apply to:

- (a) facilitators (a natural person who assists the Reporter in the reporting process and who operates within the same work context and whose assistance must be kept confidential);
- (b) persons in the same work context as the Reporter (or the one who has made a complaint to the judicial or accounting authority or the one who has made a public disclosure) and who are related to them by a stable affective or kinship link within the fourth degree;
- (c) of colleagues of the Reporter (or the person who made a complaint to the judicial or accounting authority or made a public disclosure), who work in the same work environment as the Reporter and who have a usual and current relationship with said person; and
- (d) bodies owned by the Reporter (or the person s/he works), as well as to bodies operating in the same work environment as the aforementioned persons.

Although the Company's preference is to have Reports made within the Company (i.e. internally), it could be that a (Suspected) Abuse must be reported externally. Specifically, as a priority, Reporters are encouraged to use the internal channel and may only make an external Report if one of the following conditions is met:

- the Reporter has already made an internal Report and it has not been followed up;
- the Reporter has reasonable grounds to believe that, if he/she made an internal Report, the Report would not be effectively followed up or that the same Report could result in a risk of retaliation;
- the Reporter has reasonable grounds to believe that the violation may pose an imminent or obvious danger to the public interest; or
- the internal reporting channel, although active, does not comply with the provisions of Article 4 of the Legislative Decree 24/2023 and, therefore, it does not operate nor is it properly managed. In any case, in this case the Company hopes that the Reporter - if he/she has the feeling that a Report is not properly handled or dealt with - will bring this to the attention of the Company before a Report is made externally.

The main channel for external reporting is to the National Anticorruption Authority (ANAC).

An external Report submitted to a person other than the ANAC shall be forwarded to the

ANAC, within seven days from the date of its receipt, giving simultaneous notice of the transmission to the Reporting person.

Note: The rules and principles contained in this policy do not affect or limit in any way the obligations to report to the appropriate authorities (judicial, supervisory or regulatory).

4. Confidentiality and nondisclosure

Reports can be made anonymously (see Section 9 below), directly to the persons listed in Section 8 herein, without disclosing the identity of the Reporter.

Anyone who is involved in the Reporting or investigation of a (Suspected) Abuse or information about a violation of contract and has access to information of which he or she knows (or can reasonably be expected to know) is confidential, is obliged to maintain confidentiality, except for legal exceptions. This confidential information includes in any case the identity of the Reporter (also data that can be traced back indirectly to the Reporter) and information about a business secret.

The identity of the Reporter and any information which directly and/or indirectly reveals the identity of the Reporter shall not be disclosed without the consent of the Reporter to persons other than those competent to receive or act on Reports, also in case of a non-anonymous Report.

Any Reports made shall be handled in such a manner as to ensure that it is only accessible to those persons involved with the handling of such Report.

The same confidentiality obligations apply with regard to the identity and information of persons who are the subject of a Report and any other persons named in the Report.

5. Acting in good faith

All Reporters must act in good faith and have reasonable grounds for believing the information disclosed indicates improper accounting or auditing practice, violation of internal controls, illegal activity, violation of any Applicable Policies or any other matter set forth in Section 1 of this Whistleblower Policy. A Report that, at the conclusion of the verification phase, proves to be unsubstantiated, and that proves to have been made not in good faith and not on the basis of reasonable belief and/or on the basis of grounds believed to be well-founded, and, therefore, maliciously, recklessly or with the knowledge that the allegations are false, will be considered as a serious offense and may result in a disciplinary action, up to and including termination of the employment agreement of the Reporter. Such conduct may also give rise to other measures, including civil proceedings, against the Reporter and aimed to protect Company's personnel, rights, assets and image against anyone who has made Reports that are not made in good faith and are therefore false, unfounded and/or directed for the sole purpose of slandering, defaming or causing harm to the Reported person or other persons named in the Report.

The Reporter is not protected in the event of an intentional or grossly negligent Report or intentional or grossly negligent disclosure of inaccurate information.

The Reporter will not be protected if he/she is found, even by a judgment of first instance, to be criminally liable for the offenses of defamation or slander, or to be civilly liable for malice or gross negligence for the same reasons.

6. Authority of the Whistleblower Committee

The Reporter can make a Report to the committee established by the Company responsible for overseeing the receipt, recording, retention and investigation of and response to Reports (the “**Whistleblower Committee**”). The exact composition of the Whistleblower Committee by the time this policy comes into effect as well as the respective contact details can be found in **Addendum 1**. Addendum 1 may be amended from time to time due to future changes of the composition of the Whistleblower Committee or the relevant contact details. The Whistleblower Committee will notify the Reporter (if self-identified to the Whistleblower Committee) of receipt of the Report within seven days, unless it will not be possible to acknowledge receipt because the Report was submitted anonymously.

The Whistleblower Committee will promptly bring all Reports to the attention of each of the Executive Vice President-Chief Legal Officer of the Ultimate Parent (the “**EVP-CLO**”), the Vice President of Internal Audit and Compliance of Lippert Components, Inc. and the Executive Vice President-Chief Human Resources Officer of Lippert Components, Inc. (collectively, the “**US Group**”). The US Group will in turn inform the Chairman of the Audit Committee of the Board of Directors of the Ultimate Parent (the “**Audit Committee**”) of the substance of every Report in accordance with the terms of the whistleblower policy of the Ultimate Parent then in effect to the extent such policy assigns to the Audit Committee the ultimate responsibility for overseeing the receipt, recording, retention and/or investigation of and/or response to any such Report related to the Company (as a subsidiary of the Ultimate Parent).

All Reports covered by this Whistleblower Policy will be promptly reviewed and, if necessary, investigated by the Whistleblower Committee and/or, when appropriate, the Audit Committee. If warranted by the investigation, appropriate corrective action will be recommended to the Board of Directors of the Ultimate Parent, who will communicate such decision, directly or through the US Group, to the Whistleblower Committee. Routine questions, complaints and comments that can be appropriately addressed by management will be directed to the EVP-CLO for handling in his or her discretion, and who will advise the Whistleblower Committee and/or the Chairman of the Audit Committee, as applicable, of any action taken with respect to the communication. In addition, action taken will include a conclusion and/or follow-up with the Reporter (if self-identified to the Whistleblower Committee). In any event, the Whistleblower Committee will inform the Reporter about the assessment and, if applicable, the follow-up of the Report no later than three months after the confirmation of receipt of the Report is sent, or in the absence of such notice, within three months and seven days of the date of the Report.

In the event that the reported facts are deemed relevant under Legislative Decree 231/2001, the Whistleblowing Committee will forward the Report and the results of the preliminary analysis conducted to the Company's Supervisory Board ("**ODV**"- **Organismo di Vigilanza**) under Legislative Decree 231/2001 (which has the task of supervising the operation and observance of Model 231). The Supervisory Board ("**ODV**") may decide whether to proceed with further checks and controls as deemed necessary or appropriate.

In connection with the investigation of a Report, each of the Whistleblower Committee, EVP-CLO and/or the Audit Committee may consult with, and obtain the assistance of, any member of management of the Company or any parent entity thereof who is not the subject of the Report. In addition, each of the Whistleblower Committee, the EVP-CLO and the Audit Committee has the authority, if it so chooses, to retain outside legal counsel, accountants, private investigators or any other resource deemed necessary to conduct a full and complete investigation of the Report.

The Whistleblower Committee and/or the Audit Committee may choose to *not* conduct an investigation if the Report (i) does not reasonably appear to be credible, (ii) involves only routine human resources or employment matters, (iii) does not involve an illegal practice, or (iv) involves minor inconsistencies with any Applicable Policy that would not have a material impact on the Company's business, financial reporting or reputation.

The regulations of this Whistleblower Policy regarding the processing and transfer of personal data/data privacy (in particular Section 12 of this Whistleblower Policy, i.e. sharing of personal data only to the extent deemed reasonably necessary, etc.) remain unaffected by this Section.

The Report sent to a person other than the Whistleblowing Committee will be forwarded within 7 days of its receipt to the appropriate person and, at the same time, it will be given notice of this to the Reporter.

7. Recording

The Whistleblower Committee shall register all Reports (upon receipt) in a register set up for this purpose. Personal data shall be processed in accordance with the General Data Protection Regulation ("**GDPR**") and the Company's **Whistleblower Privacy Policy** (the Whistleblower Privacy Policy can be found online, following this link: <https://www.lippertcomponents.eu/whistleblower/italy> – please note that the Whistleblower Privacy Policy may be amended from time to time in order to reflect relevant legal or factual changes; the aforementioned link will always lead you to the most current version of the Whistleblower Privacy Policy). The data of a Report, including the relevant documentation, will be retained for as long as necessary to process the Report, but no longer than five years from the communication of the final outcome of the Reporting procedure, in compliance with the confidentiality obligations. To the extent required by law, data of a Report will be deleted or anonymized at an earlier stage. Irrespective of the aforementioned, the Company may store data of a Report in an anonymized and aggregate form (e.g. for statistical purposes), provided

that and to the extent this is in line with applicable statutory requirements.

If the Report is made orally (such as during a meeting) or by recorded telephone line, or other recorded voice message system, the Whistleblower Committee, provided that it has obtained the prior consent of the Reporter, shall record the Report by making a recording of the conversation in a durable and retrievable form or shall make a precise written record of the Report. The Company will offer the Reporter the opportunity to check, rectify and agree to the transcript of the call by signing it for approval. Please note that such Report may not be able to be made anonymously in such a case. Personal data shall be processed in accordance with GDPR and the Whistleblower Privacy Policy.

8. To whom should the Report be made?

The Reporter should make the Report to the Whistleblower Committee using any of the methods described below.

9. How can the Report be made?

Reports may be submitted at any time, confidentially and anonymously (if desired), using any of the following methods:

1. Complete the Report Form attached as Exhibit A to this Whistleblower Policy (whereby the personal data can be omitted) and send it in a sealed envelope to LCI Italy S.r.l., Whistleblower Committee, Via Etruria 1, 50026 San Casciano in Val di Pesa (Fi), Italy. Write on the envelope “Whistleblower Report”, or
2. Send a Report by email to the Whistleblower Committee: WhistleblowerItaly@lci1.com or to a member of the Whistleblower Committee. The respective email addresses of the members of the Whistleblower Committee are listed in **Addendum 1** (as amended from time to time), or
3. Call a member of the Whistleblower Committee. The respective phone numbers of the members of the Whistleblower Committee are listed in **Addendum 1** (as amended from time to time), or
4. Request a face-to-face meeting with a member of the Whistleblower Committee to Report a violation by contacting them in advance by email or phone (contact information is listed in **Addendum 1**, as amended from time to time); such face-to-face meeting can also be carried out by video transmission if the Reporter agrees to it.

The Report must be, as much as possible, documented and substantiated in such a way as to provide all the elements necessary to enable the necessary checks to be carried out and to

ascertain the validity of the facts Reported. Any information provided by the Reporter that is not necessary for processing the Report according to the applicable law and this Whistleblower Policy shall not be collected or shall be immediately deleted.

*Note: submitting a Report using any of the above-mentioned methods can be done in Italian or English or any other language indicated as available in **Addendum 1** (as amended from time to time).*

“Spam” such as advertising, solicitations for business, requests for employment or requests for contributions will not be forwarded or addressed.

10. Reporting and annual review

The Whistleblower Committee and/or a designated representative will submit periodic reports to the Audit Committee of all Reports, and any remedial actions taken in connection therewith. This Whistleblower Policy will be reviewed annually by the Whistleblower Committee and/or the Audit Committee in consultation with the EVP-CLO, taking into account the effectiveness of this policy in promoting the reporting of Reports, but with a view to minimize improper Reporting and investigations.

11. Publication on the website

This Whistleblower Policy will be posted on the Company’s website and intranet.

12. Transferring and processing of personal data

The processing of personal data must be carried out in accordance with the GDPR (**EU Regulation 2016/679**), with Legislative Decree 196/2003 as amended by Legislative Decree 101/2018 and

In order for the Company to comply with this Whistleblower Policy, the Company may transfer personal data from the EEA to the US. Personal data related to this Whistleblower Policy will be transferred in accordance with applicable laws and regulations and the Company will ensure that the personal data transferred is provided an essentially equivalent level of protection as the personal data is awarded based on the GDPR, by implementing technical, organizational and contractual measures.

Personal data will only be processed and shared to the extent deemed reasonably necessary to review, investigate and evaluate the Report and to be able to take necessary measures. For more information about transferring and processing personal data pursuant to Articles 13 and 14 of GDPR, please find the **Whistleblower Privacy Policy** following this link: <https://www.lippertcomponents.eu/whistleblower/italy> (as amended from time to time). The Whistleblower Privacy Policy applies with respect to any method of Reporting by the Reporter – in the case of a Report by mail, by e-mail, by telephone and also in the case of a personal Report in a face-to-face meeting. The Reporter and, to the extent that this is allowed and/or

required by the applicable law, the subjects involved, will be made aware of the Whistleblower Privacy Policy in an appropriate form and thus of the processing of personal data pursuant to Articles 13 and 14 of GDPR.

The Company, the Whistleblower Committee as well as all other stakeholders involved in reviewing the Reported information will use reasonable efforts from a technical and organizational point of view to ensure the privacy and security of the Reported information as well as any personal data.

EXHIBIT A

**The purpose of this form is to report a Report as described
in the Whistleblower Policy of LCI Italy S.r.l.**

General Instructions:

Employees of LCI Italy S.r.l. or its Italian subsidiary, namely Ke-star S.r.l. (collectively, the “**Company**”), who are Reporting as well as external Reporters (such as customers, business partners, applicants, etc.) may, but are not required to, complete Part I of this form. All contact information is optional. Please note that, in the case of an anonymous Report without providing contact information, no corresponding feedback and follow-up can be given to the Reporter.

Part I

Name: _____
Address: _____
My relationship to the Company is: _____
To which entity is the Report addressed to: _____
Telephone Number: _____
E-Mail: _____

- I am I am not an employee of the Company
- I hereby authorize the disclosure of my identity if the Whistleblower Committee reasonable believes it is necessary or appropriate.

Part II

Type of Report: _____

- Activity: Ongoing Completed About to occur
- Unclear whether ongoing, completed or about to occur.

Department(s) suspected: _____

Individual(s) suspected: _____

Describe all relevant facts of the activity which is the subject of the Report: _____

Describe how, and approximately when, you became aware of the activity: _____

Describe any steps taken to remedy the situation prior to submitting this Report: _____

Who, if anyone, may be harmed by this activity: _____

Any information that is not necessary for the processing of the Report shall not be provided and, if provided nonetheless, will be deleted immediately.

Part III

Would you like to discuss this matter with (a member of) the Whistleblower Committee and/or the Audit Committee?

Yes No

Please be advised that applicable law prohibits the Company, as well as its directors, officers, employees or agents, from discharging, demoting, suspending, threatening, harassing or otherwise discriminating against anyone who in good faith makes a proper Report about the Company because of such Report.

Completed forms should be addressed and submitted as follows (by mail)

**LCI Italy S.r.l.
Via Etruria 1
50026 San Casciano in Val di Pesa (Fi)
Italy**

Attention: Whistleblower Committee - “Whistleblower Report”

or by e-mail to the Whistleblower Committee at
WhistleblowerItaly@lci1.com

or by e-mail to a member of the Whistleblower Committee (the respective email addresses of the members of the Whistleblower Committee are listed in **Addendum 1**, as amended from time to time)

ADDENDUM 1

Composition of the Whistleblower Committee and contact details of the members of the Whistleblower Committee

The members of the Whistleblower Committee and their contact information are currently as follows:

Name	Position/function	E-Mail address	Phone number	Possible Reporting language(s)
Christiaan Koreman	Finance Director EMEA of LCI Industries B.V.	ckoreman@lippertcomponents.com	(+31) (6) 83 78 1937	Dutch and English
Gianluca Cricchi	General Manager Caravanning Italy	gcricchi@lci1.com	(+39) 366 662 0512	Italian and English
Ferdinando Lusi	HR Director	flusi@lci1.com	(+39) 348 570 9100	Italian and English
Francesco Luigi Filippelli	Vice President Rail EMEA	ffilippelli@lci1.com	(+39) 338 578 1556	Italian and English