

Thor Industries, Inc. Supplier Code of Conduct
(Applicable to Thor companies based in the U.S.)

THOR Industries, Inc. (including its subsidiaries and affiliates based in the United States, “THOR”, “we” or “our”) is committed to conducting our business accordance with the highest ethical standards. We strive to act with integrity and fairness in both employment and business relationships. We expect our employees to act ethically and in compliance with all applicable laws at all times, and we expect the same from those with whom we do business, including business partners, agencies, vendors, and suppliers (each a “Supplier”).

This Code of Conduct applies to all Suppliers doing business with THOR or on its behalf. We expect all Suppliers will read and fully comply with the principles set forth in this Code of Conduct. We will consider a Supplier’s compliance with this Code of Conduct when determining whether to engage in, maintain, or renew a business relationship with the Supplier.

LEGAL AND POLICY COMPLIANCE

Suppliers must comply with all applicable laws and regulations, including local laws in the jurisdiction(s) in which THOR business is conducted. Specifically, but without limitation, Suppliers will not directly or indirectly act in any manner which would violate any applicable laws or regulations relating to: bribery or illegal payments, unfair competition, the environment, employment, health and safety, international trade, import or export controls, money laundering, or unfair competition.

THOR expects each Supplier will read and fully comply with THOR’s Business Ethics Policy, Anti-Corruption and Anti-Bribery (FCPA) Policy, Environmental Policy, Human Rights Policy, and other policies which THOR indicates are applicable to a specific relationship.

In the event this Code of Conduct or THOR policy conflicts with applicable law or regulation, the law or regulation will control.

EMPLOYMENT STANDARDS

THOR is committed to providing equal employment opportunities for all our employees and will not tolerate any speech or conduct that is intended to, or has the effect of, discriminating against or harassing any qualified applicant or employee because of his or her race, gender (including pregnancy, childbirth, or related medical conditions), color, age, physical or mental disability, religion, national origin, ethnicity, military or veteran status, ancestry, sexual orientation, gender identity or expression, familial status, citizenship status, genetic information, marital status, or any

other characteristics protected by law under applicable federal, state, and local law (each a “Protected Characteristic”).

We believe our Suppliers share in this responsibility, both with respect to our employees and those of the Supplier. THOR strongly encourages Suppliers to adopt and enforce the principles set forth in THOR’s Business Ethics Policy and Human Rights Policy. We will not tolerate discrimination or harassment by Suppliers due to a Protected Characteristic. We expect Suppliers will treat their employees with dignity and respect and without harassment, abuse, or physical punishment.

WORKING HOURS

Suppliers must comply with applicable wage and hour laws and regulations in the countries in which they do business. THOR expects Suppliers will provide all legally mandated compensation and benefits (including minimum wages and overtime). Suppliers must also comply with all laws and regulations governing working times and conditions, and Suppliers will not require workers to work more than the regular and overtime hours permitted under applicable law.

FREEDOM OF ASSOCIATION

We expect our Suppliers to share our commitment to complying with laws regarding freedom of association and to respect rights of employees related to collective bargaining.

CHILD LABOR

THOR prohibits the use of child labor. Suppliers must not employ any child (defined as any person who is under the age for the completion of compulsory in the country in which business is conducted, or, if higher, under the age of 15).

FORCED LABOR / SLAVE LABOR

THOR will not knowingly purchase goods manufactured as result of slavery, human trafficking, , or forced labor in any form (including, but not limited to, indentured labor, prison labor, debt bondage, forced and compulsory labor, and the use of children in armed conflict). Suppliers may not engage in or support such activities.

SAFETY AND HEALTH

THOR is committed to providing a healthy and safe work environment our employees, preventing occupational illness and injury, and maintaining compliance with applicable health and safety laws and regulations. We expect Suppliers will exhibit the same commitment with respect to their own operations and that Suppliers will comply with THOR’s occupational health and safety policies.

ENVIRONMENTAL

THOR is committed to conducting its business in an environmentally sustainable manner, and THOR takes into account the impact of our products and services within the supply chain. THOR

strongly encourages Suppliers to adopt and enforce the principles found in THOR's Environmental Policy. We expect our Suppliers will conduct their operations in an environmentally sustainable manner and to use reasonable efforts to minimize the potential adverse environmental impact of their operations, products, and services and will comply with all applicable environmental laws, regulations, and industry standards. We further expect each Supplier will maintain and environmental, health and safety management system appropriate for its business.

CONFLICTS OF INTEREST

Suppliers will promptly disclose to THOR all actual or potential conflicts in relation to their business dealings with THOR.

COMPLIANCE

Each Supplier will create, maintain, and dispose of accurate books and records as required by applicable law and regulation. Suppliers must maintain all records necessary in order to show compliance with this Code of Conduct and applicable policies, laws, and regulations.

THOR reserves the right to inspect each Supplier's operations and records to determine compliance with this Code of Conduct (including compliance with human rights and environmental management expectations). THOR may conduct inspections directly and/or with the assistance of a third party.

A Supplier must notify THOR of any non-compliance with this Code of Conduct. THOR will consider noncompliance with the Code of Conduct when determining whether to enter into, renew, or continue a business relationship with a Supplier. THOR reserves the right to suspend and/or terminate its business relationship with a Supplier which does not comply with the Code of Conduct.

REPORTING VIOLATIONS

When in doubt, ask. Whenever you have a question or concern, are unsure about what the appropriate course of action is, or if you suspect that a violation of the law or this Policy has occurred, please talk with your supervisor or the THOR Legal and Compliance Department (Phone: 574-970-7460 or legal@thorindustries.com) or by leaving a voicemail message via the Thor Confidential Hotline at 1-888-212-2098, 24 hours a day.

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