



THOR
Go Everywhere. Stay Anywhere.

Thor Industries, Inc. Vendor Code of Conduct

Thor Industries, Inc. (including its subsidiaries and affiliates, “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, suppliers, and vendors (each a “Vendor”).

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

Legal and Policy Compliance

Vendors 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, Vendors 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 Vendor 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 Vendors share in this responsibility, both with respect to our employees and those of the Vendor. Thor strongly encourages Vendors 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 Vendors due to a Protected Characteristic. We expect Vendors will treat their employees with dignity and respect and without harassment, abuse, or physical punishment.

Working Hours

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

Child Labor

Thor prohibits the use of child labor. Vendors 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). Vendors 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 Vendors will exhibit the same commitment with respect to their own operations and that Vendors 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 Vendors to adopt and enforce the principles found in Thor's Environmental Policy. We expect our Vendors 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 Seller will maintain and environmental, health and safety management system appropriate for its business.

Conflicts of Interest

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

Compliance

Each Vendor will create, maintain, and dispose of accurate books and records as required by applicable law and regulation. Vendors 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 Vendor'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 Vendor 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 Vendor. Thor reserves the right to suspend and/or terminate its business relationship with a Vendor which does not comply with the Code of Conduct.

Reporting Violations

You may confidentially report violations of this Code of Conduct by leaving a voicemail message via the Thor Confidential Hotline at 1-888-212-2098, 24 hours a day.

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