

Cavco – Human Rights Policy

January 1, 2024

Purpose	To outline Cavco's Human Rights Policy
Applicable Parties	All Employees and Third Parties and their Employees
Effective Date	01/2024
Related Policies	Code of Conduct
Review Cycle	Annual
Last Reviewed	12/2023
Last Modified	12/2023

Overview

Cavco Industries, Inc. ("Cavco" or the "Company") is committed to promoting human rights by adhering to the tenets of the United Nations' Universal Declaration of Human Rights and Guiding Principles on Business and Human Rights, as well as following relevant local and federal laws regarding human rights. This policy is in line with the commitments outlined in the Company's Code of Conduct, which governs our relationships with co-workers, customers, suppliers and investors, always abiding by the highest standards of integrity. The Human Rights Policy (the "Policy") will address Board and managerial oversight, commitments, prohibited practices and the Company's relationship with third parties.

Oversight

Executive management oversees human rights policy compliance and training and periodically reports progress and performance to the Board of Directors (the "Board"). Managerial responsibility for human rights is under the direction of the Chief Compliance Officer.

Our Commitment

Cavco is committed to respecting the dignity of each individual and expects every employee and representatives of third parties to conduct themselves in a mature, responsible, professional, and respectful manner. Regarding Human Rights, the Company has and will continue to do the following:

- Update and train employees on human rights principles outlined in the Company's Code of Conduct and this Policy;
- Monitor compliance with those human rights principles within the Company and require compliance from third parties; and,
- Communicate the channels established by the Code of Conduct for employees to report alleged human rights violations.

Egregious and Unacceptable Practices at the Company

The following practices are considered egregious and unacceptable, whether performed by employees or third parties. When identified, they warrant corrective action, including possible termination of employment or third-party engagements.

- Discrimination and/or harassment based on race, color, religion, sex (including pregnancy), national origin, age (40 or older), disability or genetic information are unacceptable.
- Cavco strictly prohibits the practices of forced labor, child labor and any form of slavery or servitude. The Company will immediately cease engagement with third parties and consider termination of employment if such practices are identified.

- Human trafficking and the use of trafficked labor is unacceptable, including the destruction, confiscation, concealment and prevention of access to employee's identification or immigration documents, including but not limited to drivers' licenses and passports.
- The Company prohibits the use of misleading recruitment practices that misrepresent information related to employment and will refrain from engaging with recruiters that fail to adhere to local and federal labor laws.
- The Company will not charge recruitment fees for potential employees and will ensure that all employees have access to documentation clearly describing the terms and conditions of employment in a language that the employee understands.

Vendor Acknowledgment

The Company communicates its human rights requirements to its suppliers and vendors as appropriate. We expect third parties to comply with the highest standards when engaging with Cavco's employees and their own employees. The Company reserves the right to terminate contracts if human rights violations are identified and confirmed.

Reporting Violations

To assist in the administration of this Policy and to allow employees to report known or suspected violations related to human rights, Cavco has established a Toll Free Compliance Hotline at 1-844-93CAVCO, as well as online at www.speakupcavco.com or text 602-786-8683.

The *Speak Up Cavco! Compliance Hotline* is an easy, risk-free way to anonymously report activities that may involve illegal or unethical behavior. The *Speak Up Cavco! Compliance Hotline* is available 24 hours a day, 365 days a year and is staffed by third-party professionals from Convercent by OneTrust. No one will be subject to retaliation because of a good faith report of suspected misconduct.

If you know of or suspect a violation of applicable laws or regulations, it is your responsibility to report that information immediately by using the *Speak Up Cavco! Compliance Hotline*, or by informing a supervisor, manager, the Company's General Counsel and Chief Compliance Officer at mick.dragash@cavco.com.