



SPEAK UP POLICY

POLICY NUMBER LG-03

Role	Name	Date
Prepared	Legal	2016/2017
Approved	Board of Directors	January 27, 2017
Effective	January 27, 2017 – Date of last Review/Revision – June, 2023	

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1 Purpose

As stated in the REV Code of Conduct, REV and its subsidiaries (“REV” or “the Company”) is committed to complying with all laws and to the highest standards of ethical conduct. Adherence to these values and standards is of the utmost importance to the Company and will be considered in employee performance evaluations. This policy establishes multiple avenues, including a Compliance Hotline, for employees to report suspected or actual violations of law, the Code of Conduct or Company policy and prohibits retaliation against those making good faith reports.

2 Scope

This policy applies to all officers, directors, employees, and independent contractors of REV and all of its subsidiaries and affiliates worldwide, including part-time and temporary employees and contract workers, as well as any third parties who act as agents or assist REV in doing business (“REV Personnel”). In addition, any persons, including but not limited to REV’s business partners (consultants, vendors, customers etc.) who have a concern about suspected or actual violations of law, the Code of Conduct or other Company policy, are invited to report such violations directly to their supervisor, another supervisor, the legal department, human resources, or via the compliance hotline.

3 Summary

All REV Personnel are required to report any suspected or actual violations of law, the Code of Conduct or other Company policy to their supervisors or managers, another supervisor/manager, Human Resources, the Legal Department or via the Compliance Hotline. The Company strictly prohibits retaliation of any kind against anyone who makes such a report in good faith.

4 Policy

This policy is intended to establish procedures for the receipt and handling of complaints, including but not limited to reports of actions that:

- May lead to incorrect financial reporting;
- Are unlawful;
- Violate Company policies, including but not limited to the Code of Conduct; or
- Otherwise amount to serious improper conduct.

Routine business or personnel matters should be directed to the employee's supervisor, the legal department, and/or human resources.

SAFEGUARDS:

Retaliation, Harassment or Victimization

Retaliation against any REV Personnel who, in good faith, reports a suspected or actual violation of law, the Code of Conduct or other Company policy, even where the report is not substantiated, is both illegal and a violation of this policy. Accordingly, REV Personnel may report in good faith a complaint regarding financial statements or other disclosures, accounting irregularities, auditing matters, violation of the securities laws or other laws, the Code of Conduct or Company policy without fear of retaliation. For purposes of this policy "retaliation" includes but is not limited to suspension, demotion, termination of employment or assignment/engagement, harassment, intimidation, threats, and/or discrimination. Anyone who is found to violate this non-retaliation policy will be subject to disciplinary action, up to and including termination of employment or assignment/engagement.

Confidentiality

All complaints of suspected or actual violations of law, the Code of Conduct or Company policy will remain confidential to the extent reasonably possible. While the Company will make every effort to protect the identity of the complainant and any witnesses to an investigation, the Company cannot guarantee absolute confidentiality as the nature or details of the complaint and/or investigation may suggest or reveal the identity of those involved. Additionally, some disclosure of the details of the report may be necessary for the Company to conduct an appropriate investigation. Nevertheless, the Company is committed to its no retaliation policy.

Anonymous Allegations

Complaints can be submitted anonymously through the compliance hotline. The Company encourages complainants to identify themselves, or to enable the anonymous dialogue function in the hotline, so that the Company can follow up and obtain any information needed to perform a prompt and thorough investigation. However, the Company will respect the anonymity of complainants and will do its best to fully and fairly investigate complaints and to determine if the complaint can be substantiated within the parameters of an anonymous report.

Untrue and Malicious Allegations

As stated above, the Company strictly prohibits retaliation against anyone who, in good faith, reports a suspected violation of law, the Code of Conduct or Company policy, even when the investigation does not substantiate the complaint. However, allegations which are made in bad faith, and/or found to be knowingly or recklessly false or malicious will be viewed as a serious violation of this policy and may result in disciplinary action, up to and including termination of employment or assignment/engagement.

PROCEDURE:

Reporting

As stated above, there are multiple avenues for reporting complaints, including to your supervisor or manager, another supervisor or manager, human resources, the legal department or via the compliance hotline. Often, your supervisor or manager is in the best position to address your concerns. However, if your supervisor or manager is the subject of the complaint or if you prefer to do so for any other reason, you may make your report to any of the other departments listed above, or to the compliance hotline.

The compliance hotline may be accessed through a toll-free telephone number, by fax or on-line from any computer with internet access. The compliance hotline is administered by an independent third-party vendor who is trained to handle your calls or submissions, anonymously if requested. The hotline is available 24 hours/day, 7 days/week to anyone who wishes to report a suspected or actual violation of law, the Code of Conduct or Company policy. It is also available to provide guidance on specific situations. The Compliance Hotline may be accessed as follows:

- Via a link on the Company intranet page, The Garage.

- English speaking USA and Canada 844-650-0004 (not available in Mexico)
- Spanish speaking North America 800-216-1288 (from Mexico user must dial 001-800-681-5340)
- French speaking Canada: 855-725-0002
- Employees outside of North America 800-603-2869
- Website: www.lighthouse-services.com/revgroup
- E-mail: reports@lighthouse-services.com (must include company name with report)
- Fax alternative for written documents 215-689-3885 (must include company name with report)

The third-party hotline administrator will forward all complaints to REV for investigation and follow-up. REV will thoroughly investigate every report and take appropriate corrective action when appropriate. Complainants are encouraged to provide sufficient information and detail so that a full and fair investigation can be conducted.

As noted above, your anonymity will be protected to the maximum extent possible. However, the nature or details of your complaint and/or the investigation may suggest or reveal your identity. Here again, the Company strictly prohibits retaliation against anyone who makes a complaint in good faith.

HOW THE REPORT WILL BE HANDLED:

All reports will be investigated in a timely fashion. All Personnel are required to cooperate fully with any such investigations. All reports will be reviewed by the General Counsel or his or her designee within the legal department. The specific actions taken will depend on the nature of the report and the information provided. All reports and complaints received through the compliance hotline will, if appropriate, be presented to REV's board of directors, including the Audit Committee. Reports regarding financial statements or other disclosures, accounting irregularities, auditing matters, violation of the securities laws or other laws and violations of the Code of Conduct will be disclosed to, and monitored by, the Audit Committee and/or the Nominations and Governance Committee of the Board of Directors.

Feedback to Reporter

For any complaint reported via the compliance hotline, the complainant will receive the following information:

- An acknowledgement of receipt of the complaint
- A reminder of the Company's non-retaliation policy
- An invitation to provide additional information/support
- The finding of whether or not the complaint was substantiated and, if appropriate and subject to legal and other constraints, the corrective action taken.

Reporting and Retention of Complaints and Investigations

The Company will maintain records of all complaints received, a description of the investigation conducted, a summary of the findings of the investigation and the communication to the reporter. The Company will retain records of all reports submitted through any avenue, including the compliance hotline.

5 Other

None.