



SUPPLIER CODE OF ETHICS – POLICY NUMBER REV-SC-01

Role	Name	Date
Prepared	Vice President, Supply Chain	April, 2018
Approved	Legal Department	April, 2018
Effective	April 2018 – Last Review August, 2019	

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1 Purpose

To set forth the standards to which all REV Group, Inc. suppliers will be held.

2 Scope

All non-employee individuals and entities that provide any goods or services (“Suppliers”) to REV Group, Inc., and any of its direct or indirect subsidiaries (REV).

3 Summary

All Suppliers must at all times operate in full compliance with all applicable laws, rules, and regulations (“Laws”). Additionally, REV expects that all Suppliers must conduct business honestly, ethically, and in such a way as to positively impact REV’s brand, while upholding the highest commitment to human rights with a focus on labor laws, health and safety, environmental, governance, and reporting and accountability.

4 Policy

4.1 Compliance with Laws

All Suppliers shall at all times operate in full compliance with both the letter and spirit of all Laws, including but not limited to human rights, labor, health and safety, environmental, intellectual property, anti-bribery, trade compliance, and competition and anti-trust laws.

4.2 Labor

Suppliers shall uphold the human rights of workers and treat them with dignity and respect.

- a) Suppliers shall only employ or engage workers who meet the applicable minimum legal age requirement, except that in no event shall Suppliers employ any person under the age of 16, even if local Laws permit otherwise. Notwithstanding the foregoing, Suppliers may allow individuals aged 15 or older to work as part of a bona fide apprentice program. Such apprentice program must be approved under local Laws and be intended to provide instruction in one or more particular industrial disciplines as part of enrollment in an educational institution.
- b) Suppliers shall not use or engage in any indentured or forced labor, slavery or servitude, human trafficking or compulsory labor.

- c) Suppliers shall set working hours, wages and over-time pay in compliance with all applicable Laws. Workers shall be paid at least the minimum legal wage or a wage that meets local industry standards, whichever is greater.
- d) Suppliers shall employ workers on the basis of their ability to do the job and treat them with dignity and respect and shall not engage in or permit corporal punishment or threatened or actual violence. Suppliers shall not engage in any discrimination or harassment, whether based on gender, race, color, religion, ethnicity, social background, age, sexual orientation, national origin, disability, political conviction, military veteran status, or any additional legally protected characteristics.
- e) Suppliers shall respect employees' right to join or not join any lawful organization, including but not limited to trade unions and works councils, and shall comply with all applicable Laws pertaining to freedom of association and collective bargaining.

4.3 Health & Safety

REV is committed to being a global leader in safeguarding the health and safety of employees, officers, directors, agents and contractors ("Personnel").

- a) Suppliers shall comply with REV's environmental, health, and safety ("EHS") policies and standards, and any site-specific EHS requirement or protocol while on-site at a REV location or at a REV customer location on behalf of REV.
- b) Suppliers shall:
 - i. Take responsibility for the health and safety of its Personnel.
 - ii. Ensure a safe work environment and minimize physical, chemical, and other hazards through proper design, engineering and administrative controls, preventative maintenance and safe work procedures as well as ongoing safety training.
 - iii. Provide workers with appropriate personal protective equipment where hazards cannot be adequately controlled by other means.
 - iv. Provide and properly maintain physical guards, interlocks, and barriers where machinery presents a potential injury hazard to workers.
 - v. Minimize the impact of emergency situations through the implementation of emergency plans and response procedures.
 - vi. Provide training and ensure that its Personnel are appropriately trained and educated in respect of health and safety matters.

4.4 Environment

At REV, environmental considerations are an integral part of our business practices.

- a) Suppliers shall maintain all required environmental permits and registrations and follow the operational and reporting requirements of such permits.

- b) Suppliers shall comply with regulated substance and product content specifications and with any applicable Laws identifying, prohibiting or restricting the use, content or handling of specific substances.
- c) Suppliers shall minimize environmental pollution and make continuous improvements to reduce or eliminate solid waste, wastewater and air emissions by implementing appropriate conservation measures in their production, maintenance, and facility processes.
- d) Suppliers shall manage, control, treat and/or dispose of non-hazardous solid waste, wastewater, and/or air emissions generated from operations as required by applicable Laws, before discharge.

4.5 Ethics and Compliance

Suppliers shall commit to the highest standards of ethical conduct when dealing with its Personnel, suppliers, customers and other relevant stakeholders.

- a) Suppliers shall accurately record and disclose information regarding its business activities, structure, financial situation, and performance in accordance with applicable Laws as well as prevailing industry business practices.
- b) Suppliers shall prohibit any and all forms of corruption, fraud, extortion, theft or embezzlement by its Personnel.
- c) Suppliers shall respect intellectual property rights and safeguard REV information. Transfer of technology and know-how shall be done in a manner that protects intellectual property rights.
- d) Supplier shall implement processes and procedures and exercise due diligence to detect and avoid counterfeit parts.
- e) REV is committed to ensuring that its products do not incorporate “conflict minerals” (mineral which are smelted into tin, tantalum, tungsten and gold) sourced from entities which directly or indirectly finance conflict in the Democratic Republic of Congo or adjoining countries. Suppliers shall: (i) Perform sufficient due diligence into Supplier’s supply chain to determine whether products sold or provided to REV contain tin, tantalum, tungsten or gold, and, if so, whether and to what extent those metals are sourced from conflict-free smelters; (ii) Report to REV the results of such due diligence to enable REV to comply with its legal obligations and policy goals; and (iii) Commit to being or becoming “conflict-free”, so that any such metals are sourced only from conflict-free smelters.
- f) Suppliers shall implement processes to address the confidentiality and protection of an employee who in good faith raises a concern, makes a report, or assists with an investigation related to potential ethical or criminal violations.

4.6 Anti-Corruption

REV is committed to complying with all anti-corruption Laws that prohibit bribes, kickbacks, or other corrupt actions to obtain or retain business or obtain any improper advantage.

- a) **No Bribes or Kickbacks.** Suppliers shall not directly or indirectly solicit, receive or offer any form of bribe, kickback, or other corrupt payment, to or from any person or organization, including but not limited to government agencies or officials, companies or Personnel of those companies.

b) Gifts and Entertainment. When doing business with or conducting business on behalf of REV, Suppliers may, for legitimate business purposes: (i) offer gifts or entertainment to suppliers, customers or other business associates; or (ii) accept gifts or entertainment offered by suppliers, customers or other business associates; provided, however, that in each instance the gift or entertainment:

- is unsolicited;
- is not illegal or in violation of this Code;
- is not a bribe, kickback or other illicit payment;
- is not given in exchange for any consideration;
- would not embarrass REV if disclosed publicly; and does not create the appearance (or an actual or implied obligation) that the gift giver is entitled to preferential treatment, an award of business, better prices or improved terms of sale.

4.7 Compliance Monitoring

Suppliers shall allow REV and/or any of its representatives or agents access to Supplier's facilities and all relevant records associated with the products and services provided to REV. Suppliers and REV shall establish a mutually agreeable date and time for access. However, risks to REV's business may require immediate access to the products, services and associated records and Suppliers shall accommodate REV's request for reasonable access as required. Suppliers also agree to cooperate with REV to investigate any allegations of wrongdoing, misconduct or corruption.

4.8 Application

Suppliers shall contractually require its suppliers and/or subcontractors to conform to standards of conduct equivalent to the provisions of this Code. REV reserves the right to audit Supplier's suppliers and/or subcontractors for compliance to this Code and Suppliers shall accommodate REV's audit as required. Suppliers shall also ensure that its Personnel comply with this Code when providing goods or services to REV.

4.9 Breach

Suppliers shall promptly report to REV written notice of known breach of this Code and implement a corrective action plan to cure all non-compliance within a specified time period. REV reserves the right to terminate the business relationship, including but not limited to suspending placement of future orders and potentially terminating current production. REV reserves the right to hold Supplier responsible for reasonable costs of investigating and remedying non-compliance.

5 Other

None.