



HUMAN TRAFFICKING POLICY

Champion Homes, Inc. and its subsidiaries (collectively, the “Company”) strictly prohibit its employees and all subcontractors and agents from:

- Engaging in forms of trafficking in persons;
- Procuring commercial sex acts;
- Using trafficked labor;
- Destroying, concealing, confiscating, or otherwise denying an employee access to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- Using misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the employee, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work;
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- Charging employees recruitment fees;
- Failing to pay return transportation costs upon the end of employment, for certain employees who are not nationals of the country in which the work is taking place;
- Providing or arranging housing that fails to meet the host country housing and safety standards; and
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other legally required work document in writing in a language the employee understands, containing a detailed description of the terms and conditions of employment, at least five days before an employee relocates to perform work.

The complete Champion Homes Supplier Code of Conduct can be found at:

EMPLOYEE AWARENESS PROGRAM

The Company has developed and implemented an awareness program to inform all employees about prohibitions against trafficking-related activities, the activities prohibited, and the actions that will be taken against the employee for violations. Those employees are trained on:

- Champion Homes’ Human Trafficking Policy and Supplier Code of Conduct;
- Consequences for violating Company policy;

- The violation reporting process, and
- A summary of the applicable laws and policies prohibiting trafficking related activities.

EMPLOYEE REPORTING/GRIEVANCE PROCESS

All employees of the Company or suppliers, subcontractors and agents are encouraged to report any activity or condition that may violate Champion Homes' Human Trafficking Policy or the requirements of applicable law confidentially and without retaliation, to the Company Human Resources Department or Ethics Hotline. The reporting system is also available for employees to report any workplace concern or potential violation of the terms and conditions of their employment. All reported concerns will be promptly investigated. The Company has also established a process to interview and protect from retaliation all employees suspected of being victims of or witnesses to alleged violations of the Champion Homes Human Trafficking Policy. This will be done prior to the employee returning to his or her country of origin if the employee is located outside their country of origin at the time of the incident being reported. Additionally, the Company will not interfere with employees cooperating fully with government authorities. Employees may also report their concerns directly to the Global Human Trafficking Hotline at 1-844-888-FREE or its email address at help@befree.org. The Company reporting process and the Global Human Trafficking hotline and email address have been made available to all employees in the Employee Awareness Program and via postings in all worksites.

VIOLATION MONITORING, REPORTING AND REMEDIATION

The Company has established a performance monitoring, detection, and remediation program to identify and address on an ongoing basis, any violations of the requirements Champion Homes' Human Trafficking Policy and applicable laws. In the event of the receipt of credible information alleging a violation, the Company will immediately take appropriate corrective and preventive action, up to and including the dismissal of Company employees and termination of contracts with subcontractors, suppliers, and agents.