





POLICY NAME:
LCI INDUSTRIES - GUIDELINES FOR BUSINESS CONDUCT

EFFECTIVE / REVISED: NOVEMBER 12, 2025

The Board of Directors of LCI Industries (together with its subsidiaries, the “Company”) has adopted these Guidelines for Business Conduct (the “Guidelines”) to:

- I. Promote honest and ethical conduct at all times;
- II. Promote full, fair, accurate, timely, and understandable disclosure in public filings and communications;
- III. Promote compliance with applicable governmental laws, rules, and regulations;
- IV. Promote the protection of Company assets;
- V. Promote fair dealing practices;
- VI. Deter wrongdoing; and
- VII. Ensure adherence to the Guidelines.

All Company directors, officers, and team members (“Stakeholders”) must be familiar with the Guidelines, comply

with them, and report any suspected violations as outlined below in Section IX. Failure to read or acknowledge the Guidelines does not excuse you from your responsibility to comply with them or other Company policies and procedures.

These Guidelines may not address every issue or situation you could face in the course of your employment or relationship with the Company, nor do they replace other more detailed Company policies.

In addition to these Guidelines, the Company has adopted a Whistleblower Policy for reporting complaints on a confidential or anonymous basis regarding questionable accounting or auditing matters, illegal activities, or violations of Company policies (see Section IX, Recording and Reporting Information - Whistleblower Policy).

If you have questions, contact your leader, Human Resources, or the Company’s Legal Department.

I. HONEST AND ETHICAL CONDUCT

The Company is committed to promoting high standards of integrity by conducting its affairs honestly and ethically, and requires all Stakeholders to conduct their Company business affairs, including their dealings with customers, suppliers, partners, competitors, and other Stakeholders, honestly, ethically, and with integrity.

II. CONFLICT OF INTEREST

It is the Company's policy that Stakeholders should not have a conflict of interest with the Company without first obtaining a waiver (discussed below). A conflict of interest occurs when a Stakeholder's private interest, or the interest of a member of a Stakeholder's family, interferes, or even appears to interfere, with the interests of the Company. A conflict of interest can also arise when a Stakeholder (or a member of his or her family) takes actions or has interests that make it difficult to perform his or her work for the Company objectively and effectively. Additionally, conflicts of interest arise when a Stakeholder (or a member of his or her family) receives improper personal benefits because of his or her position in the Company.

You should not have a personal financial interest in a supplier, competitor, customer, distributor, or any other organization that could cause an actual or perceived conflict of interest. A financial interest would be improper if the combination of your job, the amount of your investment, and the company in which you invested could, viewed objectively by another person, influence your actions as a Stakeholder.

For example, in the case of a supplier, ask yourself whether you have anything to do, directly or indirectly, with a decision on whether the Company does business with the supplier. If you do, you should not have any financial interest in the supplier.

You cannot evade a conflict of interest by acting indirectly through anyone else, including family members.

A. Non-Work-Related Activity - Competing with the Company

As a Stakeholder, you cannot market products or services that compete with the Company's products or services. In addition, you cannot work for a competitor: 1) while you are a Stakeholder and/or 2) if you have a contractual or legal obligation not to compete with the Company.

B. Supplying the Company

As a general rule, a Stakeholder cannot also be a supplier to the Company, directly or indirectly. In addition, Stakeholders cannot accept money or other benefits from any third party in exchange for preferential treatment from the Company. Further, Stakeholders cannot represent a supplier to the Company, be a part of its operating management, or work on anything offered by that supplier to the Company.

C. Company Time and Assets

Stakeholders cannot work for or solicit business from any third party while on Company property or during Company time. Further, Stakeholders cannot use Company equipment, materials, resources, or confidential/proprietary information for non-Company related activity.

D. Loans

The Company does not routinely offer loans to Stakeholders because they could constitute improper personal benefits to the recipient. Loans offered directly or guaranteed by the Company to any director or executive officer, or their family members, are expressly prohibited.

E. Waiver of Conflict of Interest

If you have any interests or activities outside the Company that could, or could appear to, influence your decisions or actions as a Stakeholder, you must disclose them to one of the Co-Chief Legal Officers of the Company. If that CLO determines that a waiver of the conflict of interest may be appropriate, a written waiver must be obtained from the Company upon approval of the Company's Audit Committee. Failure to disclose a conflict of interest and obtain a written waiver is cause for dismissal.

The Company's Co-CLO will report all requests for waivers to the Audit Committee on a quarterly basis. Directors and officers must seek determinations and prior authorizations or approvals of potential conflicts of interest exclusively from the Company's Audit Committee.

III. CORPORATE OPPORTUNITIES

All Stakeholders owe a duty to the Company to advance its interests when the opportunity arises. Stakeholders are prohibited from taking for themselves personally (or for the benefit of friends or family members) opportunities that are discovered through the

use of Company assets, property, information, or position. Stakeholders also cannot use Company assets, property, information, or position for personal gain (including gain of friends or family members).

IV. COMPLIANCE WITH LAW

It is the Company's policy to comply with all applicable laws, rules, and regulations and the Company expects Stakeholders to do so as well. Examples of such laws are included below.

Employment Laws

- Equal Pay Act (provides for equal pay for males and females for comparable work);
- Fair Labor Standards Act (regulates minimum wage and overtime compensation);
- Family Medical Leave Act (requires employers to allow eligible employees to take up to 12 weeks of unpaid leave to care for a child, spouse, or parent with a serious health condition, the birth or adoption of a child, or the team member's own serious health condition);
- Title VII of the Civil Rights Act of 1964 (prohibits employment discrimination on the basis of race, color, religion, national origin, or sex);
- Americans with Disabilities Act (prohibits discrimination in the workplace against qualified individuals with disabilities);
- Age Discrimination in Employment Act (prohibits employers from discriminating against team members over the age of 40); and
- Occupational Safety and Health

Act (requires employers to furnish their workers with a workplace that is free from recognized hazards that cause or are likely to cause death or serious injury).

Data Privacy Laws

- Laws that govern the collection, access, and use of data, such as the European Union's General Data Protection Regulation (GDPR), the California Consumer Privacy Act (CCPA), and regulatory obligations, such as the Federal Trade Commission Consent Order.
- Team members are expected to be familiar with the contents of the Company's Privacy Notice and to consult it for guidance on the protection of personal information.

Antitrust Laws

Under competition (antitrust) laws, companies cannot enter into agreements with other companies, even informally, that unreasonably restrict competition.

For example:

- Competitors cannot legally agree to charge the same price for their products.
- Competitors cannot agree to divide markets or limit production/supply.
- A company cannot have a formal or informal agreement with its suppliers that the suppliers will not sell to the company's competitors, or with its distributors that the distributors will not handle competitive products.

Except for arrangements already approved - such as standard types of contracts like sales and purchasing agreements - all other contracts or arrangements between the Company and other persons or companies should be reviewed by the Company's Legal Department.

Although Stakeholders are not

expected to fully interpret the nuances of applicable laws, rules, and regulations, they must be familiar enough with them to know when to ask questions and/or to seek advice from appropriate personnel. Questions about compliance should be directed to the Company's Legal Department.

V. USING INSIDE INFORMATION

A specific area of concern in investing is the improper use of what is called inside information: material non-public information about the Company or another company, such as a customer. The improper use of such information for your own financial benefit is a violation of law. No Stakeholder may purchase or sell any Company securities while in possession of inside information regarding the Company, nor may any Stakeholder purchase or sell another company's securities while in possession of inside information regarding that company.

For example, if you learn, through your role at the Company, that the Company, an affiliate, a customer, or supplier is about to make an announcement that could affect the price of its stock, you should not buy or sell that stock, nor suggest that someone else do so, until after expiration of two full trading days after the announcement.

The Company has also adopted an Insider Trading Policy that applies to all Stakeholders and their family members. The policy can be found at: www.lci1.com/investors under Corporate Governance – Governance Documents – Insider Trading Policy.

You cannot not evade these Guidelines by acting through anyone else or providing “tips” to others, including your family members.

VI. DISCLOSURE

The Company periodically files reports and other documents with the Securities and Exchange Commission (the “SEC”), and these documents must comply with the law. Each Stakeholder who contributes in any way to the preparation and verification of the Company’s financial statements and other financial information must ensure that the Company’s books, records, and accounts are accurate. Every Stakeholder must cooperate fully with the Company’s accounting and internal audit departments, as well as the Company’s independent public accountants and counsel.

Stakeholders who are involved in the Company’s disclosure process must: (i) comply with the Company’s controls and procedures and (ii) take all necessary steps to ensure that all filings with the SEC and all other public communications about the financial and business condition of the Company are fair, accurate, timely, and understandable.

VII. COMPANY ASSETS

Every Stakeholder is responsible not only for protecting Company assets (including confidential and/or proprietary information), entrusted to him or her, but also for ensuring their appropriate use.

Confidential/Proprietary Information

Stakeholders should maintain the confidentiality of information entrusted to them by the Company or by its customers, suppliers, or partners, except when disclosure is expressly authorized or is required or permitted by law. Confidential information includes all nonpublic information (regardless of its source) that might be

of use to the Company’s competitors or harmful to the Company or its customers, suppliers, or partners if disclosed.

Stakeholders are legally obligated to protect the Company’s confidential and/or proprietary information – even after the Stakeholder is no longer affiliated with the Company. Proprietary information includes, but is not limited to: intellectual property, such as trade secrets, patents, trademarks, and copyrights; any non-public business, financial, and product plans; designs, engineering, and manufacturing know-how and processes; customer and supplier information and lists; pricing; personnel and salary information; and any information that qualifies as confidential information under a nondisclosure agreement or as outlined above. Unauthorized use or distribution of the Company’s proprietary information is prohibited and could also be illegal, resulting in civil or criminal penalties.

Products and Production

All inventions, designs, specifications, creations, ideas, techniques, and methods involving any products or services offered by the Company, or any manufacturing techniques, and any modifications or improvements to any of these, that are invented, discovered, or implemented by any team member of the Company during his or her employment with the Company are the property of the Company and are owned by the Company. This is the case whether or not the team member used the Company’s facilities, equipment, materials, or personnel, and whether the Company markets or utilizes these inventions, discoveries, or implementations. Upon request, team members are required to sign

and deliver to the Company any documents needed to establish or record the Company's title to these inventions, discoveries, or implementations.

Technology Resources

Technology resources, including, for example, all electronic devices, software, and means of electronic communication, including access to the Internet, belong to the Company. The Company may access these resources from time to time without a team member's permission or knowledge as permitted by law.

Use of the Company's Assets

All Company assets, including facilities, equipment, and supplies, must be used only for lawful and legitimate business purposes, though incidental personal use is permitted. Any suspected incident of fraud or theft should be reported to Human Resources or the Company's Legal Department for investigation immediately.

Other Companies' Information

In the normal course of doing business, Stakeholders may acquire information about customers, suppliers, prospects, or information about their employees. There are limits on how such information may be acquired and used, especially information about competitors. No person should, through improper means, acquire a competitor's trade secrets or other confidential information.

For example, industrial espionage - burglary, wiretapping, stealing, and so forth - is obviously unacceptable. So is hiring a competitor's employees to get confidential information or urging a competitor's employees or customers to disclose confidential data.

VIII. FAIR DEALING

Each Stakeholder must deal fairly with the Company's customers, suppliers, partners, service providers, competitors, employees, and anyone else with whom he or she has contact while performing his or her job. No Stakeholder may take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts, or any other unfair dealing practice.

IX. RECORDING AND REPORTING INFORMATION – WHISTLEBLOWER POLICY

Actions prohibited by these Guidelines involving directors or officers must be reported to the Audit Committee of the Board of Directors; provided, however, if the prohibited actions involve the Audit Committee Chair, please report such actions to one of the Company's Co-Chief Legal Officers. Actions prohibited by these Guidelines involving anyone other than a director or executive officer must be reported to your leader, Human Resources, and the Company's Legal Department, or by using the reporting methods outlined in the Company's Whistleblower Policy. The Whistleblower Policy and procedure for Complaints can be found on the Company's website at www.lci1.com/investors under Corporate Governance - Governance Documents – Whistleblower Policy.

Although complaints may be reported directly to federal or state government authorities, the Company encourages the reporting of complaints within the Company for investigation and appropriate action.

Upon receipt of a report of an

alleged prohibited action, the Audit Committee, your leader, Human Resources, and the Company's Legal Department will take appropriate actions necessary to investigate. All Stakeholders are expected to cooperate in any internal investigation.

X. DISCIPLINARY ACTIONS FOR VIOLATIONS; WAIVERS

Alleged violations of these Guidelines will be investigated in a manner consistent with Company policy. Violation of the foregoing Guidelines by any Stakeholder will result in appropriate disciplinary action that may include corrective action such as changes in pay, demotion, or termination of employment. The Company shall not retain any individual who, in the good faith judgment of the Company, has shown a propensity to engage in illegal activities. If necessary, the Company may also take legal action to recover the amount of any financial loss in relation to the violation.

Those in our Company who lead

others hold a special position of responsibility to proactively promote and be an example of honest and ethical behavior. As a result, only the Board of Directors or an appropriate Committee of the Board may waive a provision of these Guidelines for an officer or director. Any such waiver shall be disclosed promptly as required by law.

The Company's CLO may waive a provision of the Guidelines for those team members who are not officers or directors. Such waiver, if any, will be discussed with the Audit Committee prior to its approval.

XI. PROHIBITION ON RETALIATION

The Company does not tolerate acts of retaliation in any form, including against any Stakeholder who makes a good faith report of known or suspected acts of misconduct or other violations of these Guidelines.







LCI INDUSTRIES

IRVEYOR
LEGEND

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