

LCI Industries

Whistleblower Policy

The Company's Guidelines for Business Conduct require directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. All directors, officers, and employees must practice honesty and integrity in fulfilling their responsibilities and must comply with all applicable laws and regulations. For the purpose of this policy (the "Whistleblower Policy" or "Policy"), the "Company" shall include LCI Industries, Lippert Components, Inc., and each of their subsidiaries.

General

The purpose of this Whistleblower Policy is to set forth the policies and procedures established by the Audit Committee of the Board of Directors of LCI Industries for:

- The reporting of complaints ("Complaints") by employees and other stakeholders of the Company, on a confidential and anonymous basis, regarding questionable accounting or auditing matters, internal controls, illegal practices, or violations of adopted policies of the Company;
- The receipt, retention, and treatment of Complaints received by the Company; and
- The protection of employees from retaliatory actions for reporting Complaints.

Complaints Covered by the Policy

Complaints should be reported about improper activities, including, but not limited to:

1. Fraud or deliberate error in the preparation, evaluation, review, or audit of any financial statement of the Company;
2. Fraud or deliberate error in the recording and maintenance of financial records of the Company;
3. Deficiencies in, or noncompliance with, the Company's internal accounting controls;
4. Misrepresentation or false statement to or by a senior officer or accountant of the Company regarding any matters contained in the financial records or any financial or audit reports of the Company;
5. Deviation from full and fair reporting of the Company's financial condition;
6. Substantial and specific danger to public health or safety;
7. Knowingly or intentionally violating any federal or state law or regulation applicable to the Company's activities or business;
8. Insider trading or the dissemination of material non-public information;
9. Violation of any other standards set forth in the Company's Guidelines for Business Conduct, Insider Trading Policy, Conflict Minerals Policy, or other policies adopted by the Company from time to time; or

10. Altering, destroying, or concealing a document, or attempting to do so, with the intent to impair the document's availability for use in an official proceeding, or otherwise obstructing, influencing, or impeding any official proceeding in violation of federal or state law or regulations.

Note: Employment related matters, other than those described above, should continue to be reported through normal supervisory or Human Resource channels. Please see the "Reporting Complaints" section below for additional information on how best to report such matters.

No Retaliation

Even though Complaints may be reported directly to federal or state government authorities, this Whistleblower Policy is intended to encourage and enable employees and other stakeholders to report Complaints within the Company for investigation and appropriate action. With this goal in mind, no employee who, in good faith, reports a Complaint shall be subject to retaliation or adverse employment consequences because of such report. In addition, no employee may be adversely affected because the employee refused to carry out a directive which, in fact, constitutes corporate fraud or is a violation of state or federal law. A director, officer, or employee who retaliates against someone who has reported a Complaint in good faith is subject to discipline up to and including dismissal from their position or termination of employment.

The Company also prohibits retaliation for good faith filing, testifying, participating in, providing information to, or otherwise assisting in a proceeding or investigation related to a Complaint, including, but not limited to, any proceeding or investigation initiated by:

1. A federal regulatory authority (such as the Securities and Exchange Commission) or law enforcement agency (such as the Federal Bureau of Investigation or FBI);
2. Any member or committee of Congress;
3. Any person with supervisory authority over a director, officer, or employee; or
4. Any person with authority to investigate, discover, or terminate the activity of the Company that is the subject of the Complaint.

Confidentiality

Complaints can be made anonymously, directly to the Audit Committee Chairperson, without disclosing the identity of the reporting person. Complaints involving the Audit Committee Chairperson can be made anonymously to Kelly Stanley, the Company's EVP, Co-Chief Legal Officer & Head of Compliance at kstanley@lci1.com or (574) 350-0113. If the reporting person's identity is provided, but request is made for confidentiality, the Company will keep the reporting person's identity confidential to the extent possible consistent with law and a full and fair investigation.

Acting in Good Faith

Anyone reporting a Complaint must act in good faith and have reasonable grounds for believing the information disclosed indicates improper accounting or auditing practice, violation of internal controls, illegal activity, or violation of the Company's Guidelines for Business Conduct, Insider Trading Policy, Conflict Minerals Policy, or other policies adopted by the Company. A Complaint that proves to be unsubstantiated, and that proves to have been made maliciously, recklessly, or with the knowledge that the allegations are false, will be viewed as a serious offense and may result in discipline, up to and including termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

The Company may include this Policy in its regular compliance and ethics trainings. The Company will ensure this Policy is accessible to all of its employees and suppliers on the Company's website and at its locations. At its locations outside of the United States, the Company will prepare a version of this Policy in the applicable local language and make it available at that location.

Authority of Committee

The Audit Committee is responsible for overseeing the receipt, retention, and investigation of, and response to, all Complaints covered by this Policy. All reported Complaints will be forwarded to the Chairperson of the Company's Audit Committee (the "Committee"), who shall bring matters covered by this Policy to the attention of the Committee and, when appropriate, to the Company's CEO and/or EVP, Co-Chief Legal Officer & Head of Compliance.

The Audit Committee Chairperson or designated representative will notify the reporting person of receipt of the Complaint within five business days, if possible. It will not be possible, however, to acknowledge receipt of anonymously submitted Complaints.

All Complaints covered by this Policy will be promptly reviewed and, if necessary, investigated by the Committee. If warranted by the investigation, appropriate corrective action will be recommended to the Board of Directors. Routine questions, complaints, and comments that can be appropriately addressed by management will be directed to the EVP, Co-Chief Legal Officer & Head of Compliance for handling in her discretion, and who will advise the Audit Committee Chairperson of any action taken with respect to the communication. In addition, action taken will include a conclusion and/or follow-up with the reporting person (if self-identified to the Committee).

In connection with the investigation of a Complaint, the Audit Committee and the EVP, Co-Chief Legal Officer & Head of Compliance may consult with, and obtain the assistance of, any member of Company management who is not the subject of the Complaint. In addition, the Committee and the EVP, Co-Chief Legal Officer & Head of Compliance have the authority, if it or he or she chooses, to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the Complaint.

The Committee may *not* conduct an investigation if the Committee is informed by the Company's EVP, Co-Chief Legal Officer & Head of Compliance that a Complaint (i) does not reasonably appear to be credible, (ii) involves only routine human resources or employment matters, (iii) does not involve an illegal practice, or (iv) involves minor inconsistencies with the Company's Guidelines for Business Conduct that would not have a material impact on the Company's business, financial reporting, or reputation.

Reporting Complaints

Employees are encouraged to first discuss any Complaint with their immediate supervisor, that supervisor's manager, or their local HR leader as long as that person is not involved with the Complaint. If, after speaking with his or her supervisor, manager, or HR leader, the reporting person is not satisfied with the outcome and continues to have reasonable grounds to believe that the Complaint is valid, or if his or her supervisor, manager, or HR leader are involved with the Complaint, the reporting person should report the Complaint to the Company's EVP, Co-Chief Legal Officer & Head of Compliance. If the reporting person is uncomfortable speaking to his or her supervisor, that supervisor's manager, the local HR leader, or the Company's EVP, Co-Chief Legal Officer & Head of Compliance for any reason, the reporting person should report his or her Complaint directly to the Audit Committee Chairperson using any of the methods described below.

Submitting a Complaint

Complaints may be submitted at any time, confidentially and anonymously, using any of the following methods:

1. Complete the Report Form attached as Exhibit A to this Policy and send it in a sealed envelope to LCI Industries, Audit Committee Chairperson, 52567 Independence Ct., Elkhart, Indiana 46514. Write on the envelope “Whistleblower Complaint”,
2. Send a Complaint by email to AuditChair@lci1.com,
3. Use the Whistleblower confidential communication portal at <https://www.lci1.com/whistleblower> to anonymously submit Complaints to be routed through the EQS Group, a third-party service provider,
4. Call the Company’s EVP, Co-Chief Legal Officer & Head of Compliance at (574) 350-0113, who will refer the matter to the Audit Committee Chairperson, or
5. Access the Whistleblower Hotline, also known as the Your Voice Hotline, at (800) 461-9330, which is managed by the EQS Group and is available 24 hours a day seven days a week, to provide guidance and information on how to submit a Complaint.

“Spam” such as advertising, solicitations for business, requests for employment, or requests for contributions will not be forwarded or addressed.

Reporting and Annual Review

The Audit Committee Chairperson or his or her designated representative will submit periodic reports to the Committee of all Complaints, and any remedial actions taken in connection therewith. This Whistleblower Policy will be reviewed annually by the Committee in consultation with the Company’s EVP, Co-Chief Legal Officer & Head of Compliance, taking into account the effectiveness of this Policy in promoting the reporting of Complaints, but with a view to minimize improper Complaint reporting and investigations.

Website Publication

This Whistleblower Policy will be posted on the Company’s website.

EXHIBIT A

**The purpose of this form is to report a Complaint as described
in the LCI Industries' Whistleblower Policy.**

General Instructions:

Employees of the Company who are reporting Complaints may, but are not required to, complete Part I of this form. For all other individuals, Complaints must be submitted on this form, and Part I must be completed. This form may not be reviewed if the reporting person is not an employee and fails to complete Part I.

Part I

Name: _____

Address: _____

My relationship to the Company is: _____

Telephone Number: _____

E-Mail: _____

I am ☐ I am not ☐ an employee of the Company

☐ I hereby authorize the disclosure of my identity if the Audit Committee Chairperson or the EVP, Co-Chief Legal Officer & Head of Compliance reasonably believes it is necessary or appropriate.

Part II

Type of Complaint: _____

Activity: ☐ Ongoing ☐ Completed ☐ About to occur

☐ Unclear whether ongoing, completed, or about to occur.

Department(s) suspected: _____

Individual(s) suspected: _____

Describe all relevant facts of the activity which is the subject of the Complaint: _____

Describe how, and approximately when, you became aware of the activity: _____

Describe any steps taken to remedy the situation prior to submitting this Complaint: _____

Who, if anyone, may be harmed by this activity: _____

Part III

Would you like to discuss this matter with the Audit Committee Chairperson?

☐ Yes ☐ No

Please be advised that Federal law prohibits the Company, as well as its directors, officers, employees, or agents, from discharging, demoting, suspending, threatening, harassing, or otherwise discriminating against anyone who in good faith reports a proper Complaint about the Company because of such report.

Completed forms should be addressed and submitted as follows:

**LCI Industries
52567 Independence Ct.
Elkhart, Indiana 46514**

Attention: Audit Committee Chairperson - "Whistleblower Complaint"