

Forest River Inc. CORPORATE POLICY Recruiting & Employing Current & Former Government Employees	<u>ORIGINAL ISSUE DATE</u>	<u>PAGE</u>	<u>POLICY NUMBER</u>
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	<u>RESPONSIBLE ORGANIZATION</u> Ethics & Compliance		
	<u>APPROVED BY</u> Pete Liegl		
	<u>EFFECTIVE DATE</u>	<u>NEXT SCHEDULED REVIEW</u>	
10/15/2019	07/06/2022		

I. PURPOSE

The purpose of this Corporate Policy (CP) is to establish guidelines for recruiting and employing current and former national, state, local or foreign government employees. The intent is to avoid any potential conflicts of interest and to comply with the Procurement Integrity Act, federal conflicts of interest laws and other applicable laws and regulations. Forest River Inc (FRI) will avoid entering into any discussion about potential or continued employment of a current or former government official which could be viewed as an attempt to influence or reward a decision made during the execution of that individual’s responsibility as a government employee.

II. SCOPE

- a. This CP applies to all employees, consultants, representatives or others acting on behalf of FRI or its subsidiaries. All individuals acting on behalf or with authority of FRI are required to adhere to this policy. Accordingly, references to “employee” in this CP are understood to include all such individuals.
- b. The provisions of this CP apply to any current or former employee or elected official of a governmental agency who is may be considered for or hired as an employee, representative or consultant.

III. GENERAL

- a. FRI’s objective is to observe the highest standards of business conduct and to comply with all applicable laws and regulations in its relationships, customers, dealers, vendors and suppliers.
- b. Certain laws and regulations may: (1) restrict discussion of employment opportunities (2) prohibit FRI from hiring certain former and current government employees or officials for a certain period of time and/or (3) place restrictions for certain periods of

time on the type of work that certain former government employees may perform for or on behalf of FRI after they are employed.

- i. FRI employees must refrain from any employment-related discussions with a current U.S. Executive Branch Employee until they have confirmed with the Chief Ethics and Compliance Officer (CECO) that employment discussions would not violate laws or standards.
 - ii. Consideration of a former U.S. government employee who previously served as a contracting officer or program manager of a procurement for which FRI was selected might require approval of the candidate's Designated Agency Ethics Official (DEAO).
 - iii. FRI will not discuss employment with or hire former government employees or their immediate family member with the intent of influencing government decisions or action.
- c. Several anti-bribery and anti-corruption laws may consider the improper hiring of a government official's family member as bribery. Special care must be taken when an applicant is a close relative of a government official who is in a position to influence a decision that would benefit FRI's business. In such cases, the close relative may be hired only if:
- i. The individual meets the standards and qualifications that apply to all FRI hires for similar roles;
 - ii. The position was properly approved with a clear business purpose and was not created as a special position for the relative; and
 - iii. Prior approval to consider this relative was obtained from the Chief Ethics and Compliance Officer or legal counsel.
- b. Any FRI employee who holds, is elected to or is appointed to a government position must notify his or her manager immediately. Special care must be taken to ensure the employee is not assigned work that creates a conflict of interest with the government position.
- c. Violation of this policy may result in disciplinary action up to, and including, termination of employment.