

Forest River Inc. CORPORATE POLICY Background Checks	<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 ensuring that Forest River, Inc. (FRI) does not authorize or permit individuals who have engaged illegal or unethical activities to act on its behalf. The intent of this CP is to prevent unlawful conduct and protect FRI's reputation as an ethical organization.

II. SCOPE

- a. This CP applies to selected applicants, employees, consultants, representatives and others acting on behalf of FRI or its subsidiaries in senior leader or sensitive positions or who work in FRI covered divisions.
 - i. A senior leader role includes general managers, division heads, Corporate Officers, Corporate department heads and senior managers.
 - ii. Sensitive positions include, but may not be limited to, positions or duties that involve significant decisions having a financial impact on company operations.
 - iii. A covered division is one that sells products to U.S. Government-funded programs, directly or indirectly.
 - iv. All individuals acting on behalf or with authority of FRI are required to adhere to this CP. Accordingly, references to "employee" in this CP are understood to incorporate all individuals within this population.

III. GENERAL

- a. It is FRI's objective to observe the highest standards of business conduct and to comply with all applicable laws and regulations in its business decisions.
- b. Job offers for senior leader and sensitive positions will be made contingent upon an acceptable criminal history background check.

- c. Prior to assigning someone to a senior leadership or sensitive position, FRI will conduct a background check that will include, at a minimum, a review of all criminal convictions, indictments, and arrests in the preceding 7 years.
 - i. Criminal convictions, indictments and arrests will not automatically disqualify the individual, but will be considered along with extenuating circumstances.
 - ii. The resulting information will be used only as a basis for denying employment if the conviction(s), indictment(s), and/or arrest(s) indicate that the person may not observe the highest standards of business conduct such that his/her employment would be inconsistent with FRI's objectives under this CP and Code of Conduct..
- d. Job offers for senior leader roles or jobs in covered divisions will be made contingent upon verification the individuals are not on the U.S. Government's System for Award Management (SAM) Excluded Parties List.
- e. Prior to assigning someone to work in a senior leadership role or covered division, FRI will conduct a review of the SAM Excluded Parties List. Individuals found to be excluded may not be assigned to work in a senior leader role or covered division.
- f. Exceptions to this policy require advance written notice from the FRI President and CEO.
- g. Violation of this policy may result in disciplinary action up to, and including, termination of employment.

Commented [A1]: David: The AA with FEMA obligates FRI to "remove such employees from responsibility for or involvement with Forest River's business affairs" anyone who is suspended/debarred or proposed for suspension/debarment until the matter is resolved. (Section 11.) As such, I think that FRI can hire someone in a non-covered divisions BUT he/she CAN'T have any responsibility for the company's business affairs and, therefore, I don't think that they can be hired in a senior management position anywhere within the company.