

Forest River Inc. CORPORATE POLICY Mandatory Reporting	<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>	
	07/06/2016	07/06/2019	

I. PURPOSE

The purpose of this Corporate Policy (CP) is to establish guidelines for reporting suspected violations of federal, state or local laws or regulations and for reporting suspected overpayments during performance of contracts using public funds. The intent is to fulfill our obligations and comply with all legal requirements, including but not limited to the Federal Acquisition Regulations (FAR), the False Claims Act and criminal laws related to bribery, gratuities, conflicts of interest and fraud.

II. SCOPE

This CP applies to all employees acting on behalf of Forest River, Inc. (FRI) or any company owned or controlled by FRI in the performance of contracts using government funds.

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 with customers, dealers, vendors and suppliers.
- b. FRI will establish and maintain a system of internal controls to prevent and detect improper conduct.
- c. Suspicion of violations of law or regulations, including but not limited to overpayment of contracts using public funds must be reported immediately to the Chief Ethics and Compliance Officer (CECO) or to the company President.
 - i. Any person receiving reports of improper conduct will forward these reports to the CECO, the company President and to legal counsel, who will in-turn determine the appropriate response, which may include making the appropriate disclosure.
 - ii. FRI will make timely, written disclosure to the relevant Office of the Inspector General, with a copy to the agency officials involved, whenever there is credible evidence of a violation of federal, state or local law or regulations involving

fraud, conflict of interest, bribery or gratuities described in U.S. Code Title 18 on any such contract that has a value of at least \$5 million and a performance period of at least 120 days.

- iii. Any overpayment of a contract involving public funds will be rectified immediately with prompt and appropriate corrective action, including subsequent credit issued to the customer, the re-issuance of the invoice and notice given to the appropriate government officials and government payment office in accordance with contract requirements.
 - iv. The CECO will maintain a record of all Reportable Matters.
- d. Violation of this policy may result in disciplinary action up to, and including, termination of employment.