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| Forest River Inc. CORPORATE POLICY Gifts & Hospitality | <u>ORIGINAL ISSUE DATE</u> | <u>PAGE</u> | <u>POLICY NUMBER</u> |
| | 01/01/2015 | 1 of 3 | 001 |
| | <u>RESPONSIBLE ORGANIZATION</u> Ethics & Compliance | | |
| | <u>APPROVED BY</u> Pete Liegl | | |
| | <u>EFFECTIVE DATE</u> | <u>NEXT SCHEDULED REVIEW</u> | |
| | 10/15/2019 | 06/20/2022 | |

I. PURPOSE

The purpose of this Corporate Policy (CP) is to establish guidelines regarding the offering, giving and receiving gifts or form of hospitality in connection with FRI business. The intent is to avoid any unlawful conduct, to include violations of the Foreign Corrupt Practices Act, and prevent any conflict of interest or the appearance of such arising out of the giving or receiving of any gift or form of hospitality between Forest River, Inc. (FRI) or any of its employees, representatives of current or prospective customers, dealers, suppliers or vendors.

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, therefore references to “employee” in this CP are understood to incorporate this population.
- b. The provisions of this CP apply to any gift or form of hospitality offered by, offered to or received by a FRI employee’s or spouse’s immediate family member, including spouse, parent, sibling, child, grandparent, grandchild or any other dependent relative, if motivated by or related to the employee’s position with FRI.

III. GENERAL

- a. FRI will observe the highest standards of business conduct and all applicable laws and regulations in its relationships with customers, dealers, vendors and suppliers.
- b. FRI will procure and provide goods and services on the basis of price, quality, schedule and compatibility with needs and requirements, not on the basis of friendships, favors or other obligations. FRI employees responsible for purchasing, procurement, customer service, customer relations, business development or related functions must take extra care to avoid any actions that create the appearance of preferential treatment or that

may adversely affect the company's reputation for conducting business fairly and objectively.

c. ALLOWED

- i. In the course of conducting business, there are occasions when it may be appropriate to offer or accept gifts or hospitality. Employees must judge carefully the impact and potential ramification of their actions, apply good sense, and seek counsel from the Ethics & Compliance Office if they have any questions or doubts about the propriety or lawfulness of their actions. FRI employees may generally offer or accept customary gifts and hospitality, including reasonable meals and entertainment, to or from current and prospective commercial customers, suppliers and vendors, if the following conditions are met. The gift or hospitality:
 1. Does not violate any law, regulation or standard of conduct of the current or prospective customer, dealer, supplier or vendor.
 2. Could not cause embarrassment to, or reflect negatively upon the reputation of FRI or the recipient.
 3. Is ordinary, customary and reasonable in the context in which it is given and received.
 4. Is modest as opposed to lavish and is offered or accepted infrequently, as those terms are normally understood.
 5. Is purchased from the company on-line store and contains the company logo.
 6. Is given or received solely because of a pre-existing personal friendship or family relationship and is paid for with personal, not company, funds, provided it does not create an actual or perceived conflict of interest.
 7. Has a fair market value of less than \$100 for single instance or \$200 cumulative value during a 12 month period.
 8. Is given to be used as part of a raffle, such as to encourage attendance at association meetings or for charitable purposes, where the gift is not intended for a specific person.

d. PROHIBITED

- i. FRI competes solely on the merits of our products and services. Employees are prohibited from:
 - 1. Attempting to influence business decisions by offering gifts or any form of hospitality.
 - 2. Accepting or offering a gift of cash, investment or cash equivalent, to include compensation, non-public discounts, honoraria, funds, checks, gift certificates, gift cards, calling cards or any other monetary or investment interests in any form.
 - 3. Offering any gift valued greater than \$10 or hospitality beyond beverages and snacks to a U.S Government official or employee. If extenuating circumstances exist or if you have questions, contact the Ethics and Compliance Department.
 - 4. Offering a gift or hospitality to any employee of a government, foreign or domestic, to facilitate or influence a decision or task for which the government employee is responsible.
- e. This CP does not address every possible situation. It is important to consider the intent of this CP and the context of the situation. Any situation not covered by this CP should be carefully reviewed and evaluated in consultation with the Chief Ethics and Compliance Officer or legal support.
- f. Refer to the Berkshire-Hathaway Prohibited Business Practices Policy and the Berkshire-Hathaway Code of Business Conduct and Ethics for additional guidance.
- g. Exceptions to this policy require advance written notice from the FRI President and CEO.
- h. Expenses incurred by an employee for a gift or hospitality prohibited under this policy will not be reimbursed. An employee may not use personal funds to pay for a gift that would otherwise be prohibited under this policy.
- i. Violation of this policy may result in disciplinary action up to, and including, termination of employment.

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