



POLICIES & PROCEDURES MANUAL
ANTICORRUPTION POLICY

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Spraying Systems Co. opposes corrupt practices and bribery in all matters related to its business operations and requires all directors, officers, employees, contractors, and third parties worldwide acting on its behalf to abide by its Anticorruption policy.

Spraying Systems Co. complies with the U.S. Foreign Corrupt Practices Act ("FCPA") and similar anti-bribery and anti-corruption laws and regulations enacted by other countries where we do business.

A violation of Anti-Corruption Laws can lead to severe civil and criminal penalties, including jail time for participants, as well as reputational harm to the Spraying Systems Co. brand. Under this Policy, employees and third part contractors working for Spraying Systems Co. are prohibited from giving or receiving the payment or promise of anything of value to/from anyone to related to its business operations to improperly influence that person to help secure an improper business advantage.

Given prohibited payments can take many different shapes and forms, as can the desired result of the payment. Therefore, the Employee of third party is required to get approval prior to offering a noncommercial payment of any kind other than as specified in this policy.

Received prohibited payments can also take many forms. These include bribes, gifts, kickbacks or promises of these received in connection with company business. Employees and third parties are prohibited from soliciting or receiving any form of bribe, gift or kickback in connection with Company business.

Permissible Meals, Travel and Entertainment include any non-cash gift given Only to provide reasonable Hospitality to create a legitimate opportunity for business discussions.

Permissible Gifts include inexpensive gifts such as Company-branded promotional items or modest tokens of respect and regard, provided that there is no expectation that it is being given in exchange for any return favor or business advantage and conforms to local law.

