



POLICIES & PROCEDURES MANUAL

WHISTLEBLOWER POLICY

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Spraying Systems Co. believes that all employees, contractors, customers, and suppliers of the Company should have a safe, fair, and ethical environment in which to perform their daily duties. This policy outlines protections in place for reporting occurrences of misconduct, violation of law, violation of Company policy, or any other prohibited offenses, and those secure investigations of these reports occur without fear of retaliation.

This policy applies to all Spraying Systems locations, including those that do not fall under applicable federal and local whistleblower laws, rules, and regulations.

Reporting of Violations

Employees may report violations to the Company's Human Resources Department located at the Wheaton, IL headquarters, to initiate the secure investigation process. All reports will be treated confidentially to the extent permitted by law.

All covered under this policy should expect to include sufficient detail concerning the reported violation to allow for a full and appropriate investigation. It is important to provide information about the names of the people involved (or witness to the incident), exact or approximate dates and times of the incident(s), location of occurrence, and why the person believes it should be reported.

All reports of violations will be promptly and thoroughly investigated, and all information disclosed during the course of the investigation will remain confidential, except as is necessary to conduct the investigation and take any remedial action, in accordance with applicable law, rules, and regulations.

All personnel (employees, supervisors, contractors, etc.) have a duty to cooperate in the investigation process. Personnel shall be subject to disciplinary action, up to and including termination of employment, if failure to cooperate with an investigation occurs, or deliberately provides false information during the investigation.

Retaliation

Spraying Systems Co. prohibits retaliation against any employee who makes a good faith report of an alleged violation or participates in an investigation. Suspected retaliation should be reported immediately to Human Resources.

Examples of retaliation include, but are not limited to, denial of hiring or promotion opportunities, threats or reprimands, negative performance evaluations, and negative job references.

Anyone, regardless of position or title, who the Company determines has engaged in retaliatory conduct will be subject to discipline, up to and including termination of employment.

Any reports of violations will be treated as made in good faith throughout the investigation process. Should investigative process determine a report is made in bad faith, the reporting personnel may be subject to disciplinary action, up to and including termination of employment, and may be liable for costs incurred by the Company to complete the investigative process.

