



## **POLICIES & PROCEDURES MANUAL**

### **HUMAN TRAFFICKING POLICY**

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Spraying Systems Co. believes that all employees, contractors, and third parties working on its behalf should respect the human rights related to ethical employment choices. This policy outlines protections against labor and sex trafficking.

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

Spraying Systems Co. strictly prohibits employees, subcontractors, subcontractor employees, and agents from engaging in human trafficking-related activities. These activities include engaging in sex trafficking, procuring commercial sex acts (even if this practice is legal in the jurisdiction where it transpires), using force, fraud, or coercion to subject a person to involuntary servitude, or obtaining labor from a person by threats of serious harm to that person or another person, among others.

Spraying Systems Co. also prohibits employees, subcontractors, subcontractor employees, and agents from engaging in practices relating to trafficking in persons, including:

- Withholding wages;
- Using misleading or fraudulent practices to recruit employees, such as failing to disclose key terms and conditions of employment;
- Using recruiters that do not comply with local labor laws; and
- Failing to provide an employment contract or work document where required by law.

Spraying Systems Co. operating companies will take appropriate disciplinary action for violations of these rules, up to and including discharge of employees, subcontractors, and agents.

Spraying Systems Co. operating companies must cooperate fully with the U.S. Government or other appropriate governmental authorities in audits or investigations relating to such violations. Employees of Spraying Systems Co. operating companies are required to cooperate in any internal or external investigation of suspected wrongdoing under this policy.

### **MANDATORY REPORTING REQUIREMENTS**

In all countries where local laws and regulations permit, employees having knowledge of credible information concerning actual or potential violations of this policy must report them immediately in accordance with the Spraying Systems Co. Whistleblower Policy. Timeliness of reporting any suspected violation is critical as the U.S. Government has strict reporting obligations when there is credible information of violations. Employees should 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.





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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.

