

# **WHISTLEBLOWER POLICY**

## **Overview**

At SunSource, we are guided by our company values. These values are the foundation of how we conduct ourselves and interact with each other, our customers, suppliers, investors and other stakeholders. SunSource is committed to ensuring corporate compliance and promoting ethical corporate culture by observing the highest standards of fair dealing, honesty and integrity in our business activities.

## **Purpose**

This policy has been put in place to ensure that any concerns raised regarding any misconduct or improper state of affairs or circumstances in relation to the Company's business are dealt with effectively, securely, appropriately, and in accordance with applicable law.

The Company encourages the reporting of any instance of suspected unethical, illegal, corrupt, fraudulent or undesirable conduct involving the Company's business and provides protections and measures to individuals who make a disclosure ("whistleblowers") in relation to such conduct without fear of retaliation or reprisal.

## **Scope**

A whistleblower, as defined by this policy, is an employee, director, officer, contractor/subcontractor, supplier, consultant, auditor, relative or affiliate of any of the foregoing of the Company who reports an activity that he or she considers to be illegal or dishonest to one or more of the parties specified in this policy.

## **Reportable Conduct**

A whistleblower may make a report or disclosure under this policy if he or she has reasonable grounds to believe that a Company director, officer, employee, contractor, supplier, consultant or other person who has business dealings with the Company has engaged in conduct ("Reportable Conduct") which is:

- dishonest, fraudulent or corrupt;
- illegal (such as theft, dealing in or use of illicit drugs, violence or threatened violence and criminal damage to property);
- unethical, including any breach of the Company's policies such as the Code of Ethical Conduct;
- potentially damaging to the Company, its employees or a third party; and
- harassment, discrimination, victimization or bullying.

## **Making a Disclosure**

A whistleblower may report Reportable Conduct to the following Company officers: (1) Chief Human Resources Officer; (2) General Counsel; or (3) Chief Executive Officer. Contact information for each of these officers is included on Attachment A to this policy.

Alternatively, if a whistleblower does not feel comfortable making a disclosure to a Company officer, he or she may disclose Reportable Conduct through the Company's confidential and anonymous Ethics Hotline at 1-833-540-0002 (toll-free) or website at <https://report.syntrio.com/sunsrce>.

The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

### **Anonymity**

As noted above, when making a disclosure, a whistleblower may do so anonymously. However, it may be difficult for the Company to properly investigate the matters disclosed if a report is submitted anonymously and therefore the Company encourages whistleblowers to share their identity when making a disclosure if they are comfortable doing so.

Given the serious nature of making a report and potential ramifications for those involved, the whistleblower should exercise sound judgment to avoid baseless allegations. An employee who intentionally makes a false report of Reportable Conduct will be subject to discipline up to and including termination.

### **Whistleblower Protections**

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. The Company will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he or she is being retaliated against must contact the Chief Human Resources Officer or General Counsel immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

**ATTACHMENT "A"**

<b>Officer</b>	<b>Title</b>	<b>Email</b>	<b>Phone</b>
David Sacher	President & CEO	<a href="mailto:dsacher@sunsrce.com">dsacher@sunsrce.com</a>	630-317-2710
Michael Agliata	VP, General Counsel & Secretary	<a href="mailto:magliata@sunsrce.com">magliata@sunsrce.com</a>	630-317-2780
Brandon Beck	Chief Human Resources Officer	<a href="mailto:bbeck@sunsrce.com">bbeck@sunsrce.com</a>	630-317-2719