

Anti-Corruption Compliance Policy (November 16, 2021)

Purpose

The purpose of this *Anti-Corruption Compliance Policy* (the “Policy”) is to set forth guidelines that will help Brady Corporation’s (“Brady” or the “Company”) employees, directors, officers and other representatives performing duties on Brady’s behalf, whether or not employed directly by Brady (together, “Employees”) comply with ethical and legal standards. This policy also establishes anti-corruption standards that our third parties (including distributors, agents, service providers, customers, and others with whom we do business) should consult and to which they should adhere. This means adhering to this Policy together with the anti-bribery laws that impact Brady’s business. Because Brady is a US-owned company doing business in many countries, we must abide by not only the US Foreign Corrupt Practices Act (“FCPA”), but other applicable anti-bribery laws where we do business.

As set forth in Brady’s *Code of Ethics*, we do not tolerate any form of bribery whether to or from public officials or private citizens or commercial organizations whether paid directly or indirectly. This rule applies to all Brady Employees regardless of where we are doing business. Additionally, individuals or businesses that provide services or products on behalf of Brady such as distributors, agents or consultants are also strictly prohibited from making or accepting a bribe on Brady’s behalf.

The Company may be held liable for violations of anti-bribery legislation that result from acts committed anywhere in the world by any of Brady’s Employees.

Violations of this Policy may have serious consequences for both the Company and the individuals involved. Individuals and corporate entities can be prosecuted for violations of anti-bribery legislation. Penalties can be imposed upon Brady and our Employees and can include civil fines and prison terms. In addition, any Brady Employee who violates the standards set forth in this Policy may be subject to disciplinary action by the Company, including termination.

Important Definitions

We should keep the following definitions in mind when reviewing and using this Policy:

- A **government official** includes all of the following:

Type of Government Official	Example
Official or employee of any national, regional, local, or other government	A customs inspector, police officer, or government minister
Elected official	A mayor, legislator, or council member

Officer or employee of a government-owned or government-controlled company	The purchasing agent of a Chinese production company
Private person acting temporarily in an official capacity for—or on behalf of—any government entity	A government consultant acting under government authority
Candidate for political or elected government office	A candidate for the local legislature
Political party or party official	The head of the local party
Officer, employee, or representative of a public international organization	An employee of the World Bank, the Inter-American Development Bank, or the United Nations
An individual holding an, administrative or judicial position	A judge or court official

- **A bribe can be either:**
 - **Offering, promising or giving anything of value to influence another in order to obtain business for Brady or an advantage for an individual; or**
 - **Requesting or accepting anything of value as a reward or as an inducement to act improperly in relation to the awarding of business by Brady.**

Bribes can include anything of value, including cash payments, charitable donations, loans, travel expenses, gifts, entertainment, job placements, reciprocal favors and any other payment.

- Brady **third parties** are consultants, agents, contractors, distributors, service providers, and other third parties who represent Brady and act on the Company’s behalf in either the private or public sector. Examples include:
 - Consultants retained to assist with obtaining permits or licenses
 - Outside lawyers
 - Customs brokers
 - Government relations consultants
 - Outside tax advisors
 - Companies providing contract transportation services

Scope of the Policy

The policies, procedures, and due diligence procedures in this Policy apply to every Employee of Brady regardless of geographic location.

Overview of Anti-Bribery Laws

The FCPA is a US law that prohibits giving anything of value to a non-US government official in order to influence the official to do any of the following in an official capacity:

- Engage in any governmental act or decision
- Use his or her influence to affect a government decision
- Assist Brady in obtaining or retaining business

A government official (referred to as a “foreign official” in the text of the FCPA) is defined broadly to include any non-US employee of a government entity or subdivision or anyone acting on behalf of a non-US government, even if temporarily. It is important to remember that employees of government-owned firms are government officials if the firm is majority owned by the government. For example, the procurement manager for a non-US, nationally owned company would be a government official under the FCPA, even though he or she might not be viewed as a government employee in the traditional sense. The FCPA contains similar prohibitions for payments to non-US political parties, non-US candidates for political office, and employees of international organizations.

Payments to a government agency or a state-run entity are not prohibited under the FCPA. Should an official controlling the state-run entity benefit directly from the payment in some way, however, a question could be raised as to whether the payment was really for the entity. Even the appearance of improper payments—regardless of their intent—can lead to legal or reputational complications for Brady. Keep in mind that some countries, like China and the UK, also have criminal laws prohibiting certain payments to government entities.

The FCPA strictly prohibits using another company or individual (such as a consultant, agent, or distributor) to engage in any of the activities listed above.

The United States and its largest trading partners have also adopted a multilateral convention (the OECD Anti-Bribery Convention) that requires each country to:

- Enact laws prohibiting bribery in international business dealings in public markets, and
- Mandate accounting protocols making it easier to detect corrupt activities

The United Kingdom enacted the Bribery Act of 2010 which prohibits bribery committed in the commercial sector (*i.e.*, the bribe is made by one business to another, with no governmental official involved) and bribery of government officials, including “facilitation” payments (*i.e.*, an unofficial payment made to a government official for the purpose of performing, or accelerating the performance of, a routine service). The Bribery Act applies to any corporation provided it carries on a business, or part of a business, in the UK. It can apply to corrupt conduct that takes place entirely outside of the UK.

The US and the UK are not the only countries with anti-bribery laws; many countries and territories make it a crime to offer or accept bribes. The legal landscape is complicated and Employees who have

any concerns or questions about these issues should **seek advice** from the available resources detailed below in the *Resources for Seeking Advice and Reporting Concerns* section.

Q: Jeremy works in sourcing and is a purchasing agent for the Company and was recently promised a \$500 gift certificate for golf lessons by a vendor seeking to sell products to the Company. Since Jeremy isn't offering a bribe to a government official, is this okay?

A: No. Such conduct is a clear violation of the standards discussed in this policy, the standards discussed in *Brady's Code of Ethics*, and the law.

How to Use This Policy

This Policy is divided into sections that correspond with several of the risk areas that may be encountered while engaging in Brady business. These risk areas include:

- Third Parties
- Vendor Selection Including the Hiring of Local Professionals
- Facilitating Payments
- Political and Charitable Donations
- Travel, Meals and Entertainment
- Gifts
- Hiring of Government Officials
- Ports and Borders
- Accurate Accounting
- Anti-Corruption Training

When dealing with a transaction involving one of these risk areas, you should refer to the relevant section of this Policy for the standards and procedures that you must follow, as well as cross-references to other relevant policies and procedures.

Compliance with Policies and Procedures Is Mandatory

The Company may be held liable for violations of anti-bribery legislation that result from acts committed anywhere in the world by any of Brady's Employees.

Violations of these policies may have serious consequences for both the Company and the individuals involved. Individuals and corporate entities can be prosecuted for violations of anti-bribery legislation. Penalties can be imposed upon both Brady and our Employees and can include civil fines and prison terms. In addition, any Brady Employee who violates the standards set forth in this Policy may be subject to disciplinary action by the Company, including termination.

Q: Bart has heard rumors that other companies may be paying for lavish trips and entertainment for non-US officials of Chinese national hospitals. He wonders if Brady doesn't do the same, some of its competitors may have an unfair advantage. Why do we have to abide by the FCPA and other global anti-bribery legislation while others do not?

A: Brady's actions will never be dictated by what our competitors do. We want to be a leader and not a follower. In the long term, we can best achieve outstanding financial results for our shareholders by requiring all our Employees to strictly adhere to our values, our *Code of Ethics*, all applicable Brady policies, and all applicable laws including the FCPA. Our Employees, customers, and shareholders want to do business with Brady because we have the best products and services. We also believe they respect and admire our high ethical standards. Doing the right thing is always good for business and preserving shareholder value.

Resources for Seeking Advice and Reporting Concerns

If you are ever in doubt about whether a payment or other transaction would violate this or other Brady policies or the law, do not make a decision alone. Instead, **seek advice**. All Employees have an obligation to immediately report any known or suspected ethical or legal misconduct. However, corruption issues are frequently not clear cut. Whether a particular payment or action violates this Policy often depends on unique facts and circumstances. One minor detail could mean the difference between a permissible payment and an impermissible one. Because each situation is unique, seek advice from the resources listed below whenever the correct, legal course of action is unclear.

Contact any of the following resources to obtain guidance or to report concerns about an actual or suspected violation:

- **Your manager**
- **Any manager senior to your manager in your manager's reporting structure**
- **Brady's General Counsel at +1 (414) 358-6608**
- **The Internal Audit Department by phone at +1 (414) 438-6847**
- **By web at www.bradyethics.com**
- **The Brady Ethics Hotline at +1 (877) 781-9309**

If you are attempting to call one of the phone numbers listed above from a location outside the United States, you may use one of the toll-free local access codes provided by AT&T, which are accessible online (<https://www.att.com/ecms/dam/att/consumer/help/pdf/access-codes.pdf>). If you call the internal hotline, you will be prompted to leave your message. The Internal Audit Department will respond to your concerns quickly. If you call the Ethics Hotline, the call will be connected to a third-party hotline specialist. If you do not speak English, or prefer to have an interpreter assist you in speaking with the hotline specialist, immediately inform the specialist which language you speak. The specialist will then conference in an interpreter. As this happens, you will hear music. Please remain on the line. You will then hear a recorded message in your language to confirm that an interpreter will come on line shortly. An interpreter will then join your conversation to assist you and the specialist in completing the call.

Brady has contracted with an independent third party that administers our Ethics Hotline. The hotline is globally available 24 hours per day, seven days per week to record your questions or concerns. You may make an anonymous report to this hotline where permitted by local law. However, please keep in mind that by providing as much information as possible, including your name, our Company will be better equipped to resolve the issue you have raised.

Managers Have Additional Obligations

At Brady, managers are stewards of our *Code of Ethics* and related policies, such as this *Anti-Corruption Compliance Policy*. If you are a manager, you are expected to lead by example and ensure that the procedures in this Policy are being followed. If an Employee contacts you regarding a matter covered by this Policy, you must raise the issue to the appropriate contact listed above. Managers who fail to report a violation that they knew about—or should have known about—may be subject to discipline, up to and including termination.

Third Parties

Brady may retain third parties such as agents, brokers, consultants, contractors, distributors, service providers, joint venture partners and any other parties to perform services on our behalf. It is critical to remember that, under anti-corruption laws, third parties cannot be hired to do anything that we are prohibited from doing ourselves. Further, we may be held liable and criminally prosecuted for the acts of third parties if they commit bribery on behalf of Brady or for Brady's benefit. Therefore, the third parties we retain must be legitimate service providers and must share our commitment to the high standards of ethical business conduct expressed in Brady's policies and our *Code of Ethics*. We must also ensure that our retained third parties comply with the FCPA and other applicable laws, as well as mandatory Company policies and procedures.

Part of ensuring a shared commitment to ethical conduct means knowing the third parties we are retaining and due diligence checks must have been carried out on all third parties before they are retained. This should include a risk assessment of factors including the country in which the business is to be conducted, the third party's potential business partners and the nature of the proposed project or transaction. If you are interested in retaining a third party on Brady's behalf, you must also be sure that the contract includes appropriate language regarding anti-corruption compliance, and you can contact Brady's legal department for assistance.

- You must immediately inform **Brady's General Counsel, or your manager**, of any situations in which red flags arise, or actual or suspected misconduct occurs. Common "red flags" for anti-corruption issues include the following:

Examples of Red Flags in Retaining Third Parties

A proposed third party **requests, without reasonable explanation, fees that are much greater than the market rate for comparable work**. A request for unusually high compensation may indicate that part of the fee will be used for improper payments.

<p>A government official recommends that Brady hire a specific person or company to act as a third party. The official may be seeking to enrich him- or herself through kickbacks. “Kickbacks” are a form of bribery involving the return of a sum of money already paid—or due to be paid—as a reward for making or fostering business arrangements, from the third party that made the arrangement.</p>
<p>A local attorney or agent suggests an “expedited” result for a fee. The attorney claims to have special knowledge of a local law, rule, or a relationship with a local official that will allow him or her to smooth the way for Brady.</p>
<p>A third party proposes to be paid a large contingency fee if, for example, a commercial or government contract is awarded or a favorable regulatory change is achieved. This type of compensation structure can create an incentive for the third party to make an improper payment in order to achieve a favorable result.</p>
<p>A third party requests that payments be made to another party, to a third-country bank account, or through other unusual financial arrangements. Such an arrangement may indicate an effort to use the funds for an improper purpose.</p>
<p>A third party requests to be paid in cash for services that are typically paid by bank transfer or other non-cash means.</p>
<p>A third party refuses to certify that it will not take any action in furtherance of an improper payment. All third parties that do business with Brady should be prepared to give this standard commercial assurance.</p>
<p>A third party has a reputation for paying bribes.</p>
<p>A third party’s company is not listed in standard industry directories or is not known to people knowledgeable about the industry.</p>
<p>A third party requests that his or her agreement be kept secret from his or her employer.</p>
<p>A background check of the principals of a third-party company uncovers unusually close links to, or some degree of ownership by, a government official.</p>

Due to the broad scope of the anti-corruption laws that apply to our business, Brady may be responsible for ensuring that our distributors adhere to these same standards. You should immediately inform the **General Counsel** if a distributor’s behavior raises any red flags.

Q: Filip is involved in expanding Brady’s presence in China. He speaks with a local consultant regarding the process for obtaining a certain permit. She tells him about her close relationship with a local government official, suggesting that her firm can help him get the permit more quickly—for a fee. What should Filip do?

A: Filip must not retain this consultant. What she has asked for is a form of bribery, and Brady does not pay such fees. After declining to retain the consultant, Filip should notify **the General Counsel, or his manager**. Many countries where we do business have regulations prohibiting this practice, but if we do encounter it we should report it right away.

Vendor Selection

Brady sources a range of services from vendors around the world. The principal risk of corruption in these activities involves government officials or third parties who may attempt to pressure Brady to select a favored vendor. Such pressure may signal an effort to benefit from an undisclosed relationship with that vendor.

Therefore, before engaging a vendor, we must assess whether the vendor is likely to pose a corruption risk. We may never select a particular vendor in order to gain influence on Brady's behalf with a government official or to provide an undue advantage to a third party. When engaging or managing vendors, be alert for signs that a vendor may have a special relationship with a government official or third party. If a government official or third party attempts to influence your choice of vendor, you must alert **Brady's General Counsel or your manager** promptly.

Facilitating Payments

In some countries, it is common for government officials to demand small "facilitating" or "grease" payments in order to speed up the performance of a routine government action. A routine government action generally means a basic, low-level administrative task to which Brady is entitled and that the government official must perform. Some examples include obtaining a permit, license, or other official document; processing visas or work orders; or providing telephone, water, or power service. Laws regarding such payments may vary greatly from one country to the next. For example, under UK anti-bribery laws facilitating payments are illegal. In addition, it can be extremely difficult to distinguish between a legitimate facilitating payment and a bribe. Due to these factors, you are prohibited from making payments **of any kind** to a government official.

If you receive a request for a facilitating payment, you must promptly notify **Brady's General Counsel, or your manager**, of the situation.

Q: Jessica conducts most of her business in a small Asian country. While on a business trip, a government official asks her for a small payment in order to make a business transaction go more smoothly and quickly. She feels nervous about complying with his request, but knows that this is part of the local business culture. She sees her competitors making similar payments. Can she give the requested payment to this official?

A: Jessica *may not* make this facilitating payment. It can be extremely difficult to distinguish between a legitimate facilitating payment and a bribe, and penalties for bribery can be extremely severe for both the Company and the individual involved. If you have any questions about bribes or payments, particularly when conducting business outside the United States, seek guidance immediately from the resources named in this Policy, under the *Resources for Seeking Advice and Reporting Concerns* section.

Political and Charitable Donations

The laws governing corporate political contributions differ greatly among the countries in which we do business. In addition, some countries have historically seen political contributions diverted to private use or used to obtain special favors. Furthermore, corporate political contributions, even if lawful, can be criticized as an attempt to exert inappropriate influence on the political process. It is the policy of Brady not to make political contributions. If there are exceptional circumstances where you believe making a political contribution is in the best interest of Brady, you must first seek the approval of the CEO, and no contribution can be made without the prior written approval of the CEO.

Government officials may seek Brady's help to support some public or charitable purpose, and this should be treated as a political contribution.

Customers or commercial entities may also from time to time request that Brady make a charitable donation to support a certain cause. It is important to ensure that any charity to which we donate is a legitimate and genuine charity and that it matches Brady's commitment to the highest ethical standards. In some countries, it is not unusual for illegitimate charities to be set up as a vehicle for corrupt payments. Therefore, before any charitable donation is made on behalf of Brady, you must confirm the legitimacy of the charity, and then apply to the Brady Foundation for the proposed donation. All charitable donations must be made through the Brady Foundation, which will determine whether to make the donation. If the Brady Foundation elects not to make the donation, you may seek approval for Brady to make the donation by application to the CEO as described below.

The following guidelines will be applied to all requests for charitable donations that are submitted:

- We may not approve a donation as part of an exchange of favors with any government official or to obtain some benefit for the Company, even if the recipient is a bona fide charity. If a government official has promised any benefit or issued any threat in connection with a donation request, we must deny the request.
- Donations of cash are generally prohibited if either the requestor or the recipient is affiliated with a government entity. This means we should make donations "in kind" with goods or services arranged by the Brady Foundation (or by Brady if approved by the CEO after the Brady Foundation elects not to make the donation), rather than money, if any donation is made at all.
- All requests submitted must be made in writing to the Brady Foundation (or to Brady after the Brady Foundation elects not to make the donation), and must identify:

1. Who sent the request
 2. Who would benefit from the request
 3. Why Brady might be interested in entertaining the request
 4. Whether Brady has donated to the entity requesting the donation in the prior calendar year and if so, how much
 5. Whether a government official could in any way benefit from Brady granting the request
- Any cash donation must be made through the Brady Foundation (or by Brady if approved by the CEO after the Brady Foundation elects not to make the donation). If a cash donation is requested, such a proposal must be presented to the Brady Foundation and processed through the Brady Foundation (or presented to Brady after the Brady Foundation elects not to make the donation). No other forms of cash donations are allowed. Contact the Brady Foundation Secretary, or the General Counsel of Brady, for additional information.

For each political or charitable donation Brady makes, responsible parties must retain the written request for the donation, the written confirmation of the consent to the donation of the Brady Foundation or CEO of Brady, as applicable, obtain evidence of receipt and properly record the donation.

Q: A regional governor who is up for re-election asks Alejandro, a Brady manager, to help set up a donation of supplies to a local school. Alejandro thinks that the community program would be an excellent cause for Brady to support. He also figures that helping the governor may help Brady get the permits it needs to pursue opportunities in the governor's region. Is this donation okay?

A: Most likely not. Alejandro may not approve a donation as part of an exchange of favors with any government official or in order to obtain some benefit for Brady, even if the recipient is a legitimate charity that could benefit from the donation. Brady's support of the school could be seen as giving the governor a personal benefit (an improved chance of being re-elected) in return for an improper business advantage (the governor's support and the permits). In any event, Alejandro should discuss the request with **Brady's General Counsel**.

Travel Expenses Meals and Entertainment

Travel Expenses

At times, we might be asked to pay for a government official's, customer's or business partner's travel, lodging, and related expenses. Brady may only agree to this if:

- The travel is for a *legitimate business purpose* that is related to the recipient's performance of his lawful duties
- The expenditure is legal under local written law
- The cost is *reasonable* given the recipient's seniority in their organization
- None of the recipient's friends or family members are traveling at the Company's expense

- No stopovers are planned that are not directly connected to the business purpose of the travel, unless the stopover is at the expense of the recipient and results in no additional cost to Brady

Any offer of payment for travel, lodging, and related expenses must be pre-approved by your supervisor. If the recipient is a government official, additional caution must be taken, and therefore, payment for travel, lodging and related expenses for government officials must be pre-approved by both your supervisor and **Brady's General Counsel**. The expense will only be authorized if the official's supervisor has prior notice of the trip, preferably evidenced by a letter from the supervisor requesting that Brady pay for the expenses in question

If possible, all payments for travel, lodging, and related travel expenses should be made directly to the airline, hotel, or other vendor. Otherwise, a written receipt with invoices attached must be submitted for reimbursement.

Meals and Entertainment

Meals associated with legitimate business activities are generally permissible, for example providing lunch for a government official or a business partner who is visiting a Brady office for a meeting is unlikely to raise an inference of corruption. However, entertainment expenses warrant more scrutiny. While meals are a common forum for business discussions, the connection between entertainment and business activities is more subjective.

It is important that entertainment and meals offered by Brady are not, and do not appear to be, a disguised way of giving an improper personal benefit to the recipient. Brady may only pay for or provide a meal or entertainment if it would fit all of the following criteria:

- Legal under local law
- In accordance with local business custom
- Reasonable in value and not excessive or extravagant
- Infrequent
- Of a nature that would not embarrass Brady or the recipient if publicly disclosed
- At least one Brady employee and one employee of the other party must be present at the event
- Compliant with Brady's business expense and travel reimbursement policies

Entertainment is reasonable in value if its cost is normal and customary under local practice, and is not perceived as a bribe or otherwise influencing your or the recipient's business decision. Appropriate entertainment events may include concerts, sporting events, various supplier/customer sponsored events, golf and other leisure activities. You are expected to exercise good judgment and act with integrity when participating in such events. If you have any questions regarding the criteria for permissible entertainment, including what is reasonable in value, you must discuss with your supervisor.

Additional caution must be taken when working with government officials and therefore all meals and entertainment for government officials must be pre-approved by **Brady's General Counsel**.

Q: Miles is working on a potential contract with the state-owned electricity utility in a small African country. The purchasing agent has expressed interest in meeting with Miles at Brady's headquarters, with a stopover in Aruba on the way, and she wishes to bring her husband along. Would it be okay for Brady to cover these expenses?

A: Probably not. First, it is unclear if the trip serves a business purpose. Miles must determine if there is a legitimate purpose, and document his determination in writing. Second, Brady should not pay for any stopover or additional expenses for the purchasing agent's husband. Additionally, Miles needs to determine whether covering travel expenses for the purchasing agent is legal in the country where they're doing business. Miles must also obtain permission from **Brady's General Counsel** before any reimbursements or expense payments are made.

Q: Olivia is working with an existing customer on a Brady project. After a long day of work, they agree to eat dinner together to discuss the final details for conclusion of the project. Olivia would like to treat the customer to dinner to thank him for being helpful throughout the process. Is this acceptable?

A: Since the meal has a business purpose, it is most likely acceptable. However, Olivia needs to ensure that the meal is reasonable in value and not excessive or extravagant.

Gifts

Because giving gifts can be deemed bribery in some situations, doing so comprises a sensitive subject. Local laws in many of the countries where we operate prohibit such activities. Even where local law allows it, we must always exercise caution before giving any gifts on Brady's behalf.

While Brady allows nominally valued gifts to be given or received the following guidelines are required to ensure that no inference of improper behavior can arise from the giving or accepting of gifts. No gift may be **provided or accepted**, regardless of size if it could reasonably be expected to:

- Affect the outcome of a government decision or a business transaction, or
- Gain any other advantage for the Company

In addition, a gift **whether given or received** must fit all of the following criteria:

- Legal under local law
- Not in cash or cash equivalents (such as gift card, except as provided below)
- Not solicited
- Permissible under the internal policies of the recipient's organization
- In accordance with local business custom
- Nominal in value
- Infrequent
- Appropriate for the occasion
- Of a nature that would not embarrass Brady or the other party if publicly disclosed

- Compliant with Brady's business expense and travel reimbursement policies

Gifts of nominal value are not disproportionate under local custom, and are not extravagant. Nominal value will vary from country to country, and ultimately, the value of the gift should be such that it is normal and customary under local practice, and is not perceived as a bribe or otherwise influencing your or the recipient's business decision. If you have any questions regarding the criteria for a permissible gift, including what is nominal value, you must discuss with your supervisor.

It is not permissible to provide personal gifts to employees of commercial partners that do not meet the above criteria, particularly when the value of the gift is not nominal. Such gifts may be viewed as an attempt to influence their decision making. Further, gifts or promotions based on sales volume or other marketing initiatives must also meet the above criteria as well.

Gift cards can be given to participants (customers or potential customers) as compensation for activities beneficial to Brady, such as completing surveys or participating in focus groups, provided the gift cards otherwise comply with the criteria for business gifts outlined above.

Additional care must be taken when giving gifts to Government Officials. As such, in order to offer **any gift** to a government official, you must obtain prior approval from **Brady's General Counsel**.

The guidelines in this section also apply to gifts that are given to family members of government officials, customers or business partners. If you are ever unsure whether the gift you plan to offer or accept fits the above guidelines, you must consult **Brady's General Counsel or your manager**.

Hiring of Government Officials

Situations may occur in which a government official speaks to us regarding employment at Brady or consideration for consulting or other contracting. For example, an official may ask for help securing a position at Brady for his or her relative or friend, or may inquire about their own employment in anticipation of leaving a government post. These situations pose a heightened risk and must be approached with caution, as even the *appearance* of impropriety can be harmful to our reputation. Accordingly, we must adhere to the following policies when making hiring decisions involving a government official or a person recommended by an official:

- If a government official offers to give Brady a benefit for hiring a suggested person, or if an official threatens to take adverse action if the suggested person is not hired, then the suggested person may **not** be hired under any circumstances.
- The normal hiring procedures established by the Human Resources Department must be followed for any candidate recommended by, or related to, a government official. The candidate must be evaluated based on the same criteria as other applicants for the same job.
- We may not discuss employment or consulting opportunities with a government official who is in any way working with Brady while the official is employed by the government. We may not even suggest to a government official that there may be a potential employment or consulting opportunity for him or her if he or she were to leave the government position.

- In addition, we may not ask our third-party partners, or any other third parties, to hire someone recommended by a government official as a way of circumventing this policy.

If you know or suspect that inappropriate conversations about employment, improper hiring practices, or inappropriate job referrals are taking place, it is your responsibility to notify Brady's General Counsel immediately.

Ports and Borders

Brady's policy in dealing with customs brokers and other port and border officials is simple. No one may ever pay or authorize a bribe to a customs official or other government official in order to transfer people or goods across a border, to avoid a customs penalty, or for any other purpose.

We must immediately inform **Brady's General Counsel** if a customs or other port or border official solicits an improper payment from us, or if we learn of such a solicitation in connection with our business.

We may not authorize or reimburse a questionable payment made by a fellow Employee or one of our customs brokers or other third-party representatives. Instead, we should bring questionable payments to the attention of **Brady's General Counsel**.

Accurate Accounting and Financial Integrity Requirements

We must do our part to ensure that Brady makes and keeps proper books, records, and accounts. These must be kept in reasonable detail, accurately and fairly reflecting the transactions and dispositions of the Company's assets. This means that we must accurately record all transactions and other expenditures described in this Policy on the books of the relevant business unit.

In addition, we must never hide or purposefully misclassify expenses. The goal of this requirement is to eliminate "slush funds," or caches of hidden or misclassified assets, that could otherwise be used to make illegal payments and bribes to government officials. No false or misleading entries may be made in the books and records of Brady. Employees are prohibited from engaging in any arrangement that would result in such entries. No undisclosed or unrecorded funds or accounts may be established, whether directly or indirectly controlled by Brady.

If you know of or suspect improper or fraudulent accounting practices, you must immediately report the matter to **Internal Audit**.

Audit and Document Retention

All of the areas addressed in this Policy may be subject to review and/or audit by regulators, business partners, or investors. Because of this, it is critical that we maintain documents appropriately and in accordance with our *Corporate Record Retention Policy*. All documents must be retained for their record retention period, and then appropriately discarded when their retention period expires.

Anti-Corruption Training

Employees in certain positions are required to undergo training on a regular basis to ensure they are aware of how corruption and bribery may arise in practice, the risks of engaging in corrupt activity, this policy and how they may report suspected corruption and bribery.

Responsibilities and Review

Brady's General Counsel has overall responsibility for corruption and bribery matters including reviewing this policy and its implementation on an annual basis to ensure it continues to comply with relevant anti-corruption laws and is suitable for the operational risks of the business.