

	Company Policy	Implementation Date:	September 02, 2025
	Anti-Corruption Policy	Last Reviewed Date:	July 23, 2025
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Owner:	Deputy General Counsel	Approval:	EVP & General Counsel

## 1. Purpose

Generac is committed to conducting business fairly, honorably, with integrity, and in compliance with all applicable laws. Bribes and corrupt payments are strictly prohibited.

This Policy provides guidance so that the Company complies with all applicable anti-bribery and anti-corruption laws around the world, including without limitation, the U.S. Foreign Corrupt Practices Act (“FCPA”), the U.K. Bribery Act, and all other applicable laws relating to bribery, corruption, or kickbacks, collectively referred to as “Anti-Corruption Laws.”

## 2. Scope

This Policy applies globally to all Generac affiliated companies and covers the conduct of directors, officers, and employees worldwide (collectively, “Covered Persons”).

## 3. Definitions

**Bribery** is the offer, promise, giving, demanding or acceptance of anything of value as an inducement for an action which is illegal, corrupt, unethical, or a breach of trust.

**Anything of Value** includes, but is not limited to, cash, entertainment, excessive meals/entertainment cost, excessive or non-business-related travel, gifts/donations, gratuities, or paying inflated prices to purchase a public official’s property or services.

A **Public Official** is:

- officer, employee, or representative of any, (a) national, state, local, municipal, or other governmental entity, (b) government-owned or controlled company, instrumentality, or other entity, (c) political party, or (d) international organization, such as the United Nations;
- political party;
- candidate for political office;
- elected government official at any level of government; or
- person acting in an official capacity for or on behalf of any of the foregoing.

A **Covered Third Party** is a third-party representative such as a dealer, distributor, agent, consultant, broker, or other third party who is engaged by Generac to act on Generac’s behalf with a Public Official.

## 4. Procedure

### 4.1 Record Keeping and Internal Accounting Controls

All payments must be accurately reflected in company books and records in a timely manner and in reasonable detail. Undisclosed or unrecorded accounts may not be established or maintained. False, misleading, incomplete, or inaccurate entries in the Company's books and records are prohibited.

### 4.2 Gifts, Meals and Entertainment

Gifts, meals, and entertainment, although customary in a business relationship, may never be offered or provided to Public Officials and other third parties, including customers, as an incentive or in exchange for an improper advantage, such as awarding the Company a contract or granting regulatory approval. In addition, the provision of gifts, meals, and entertainment must be:

- legal under local law and allowed under the policies of the recipient's organization;
- related to a legitimate business purpose;
- within company policy gift meal and entertainment spending limits, considered modest in value, and provided infrequently;
- provided openly and transparently;
- not in the form of cash or cash equivalents such as gift cards, checks, loans, stocks, or stock options;
- of a nature that does not have the appearance of impropriety and would not embarrass the Company if publicly disclosed.

### 4.3 Travel and Expense for Public Officials

Paying for the travel and entertainment expenses of Public Officials, including extending letters of invitation for cross border travel authorization, is not allowed unless pre-approved in writing by the Corporate Legal Department.

### 4.4 Charitable Contributions

Generac makes charitable contributions only if the funding is used for a bona fide charitable purpose without expectation of any benefit given in return. Charitable contributions cannot be made without prior written approval by the Corporate Legal Department.

### 4.5 Facilitation Payments

In certain countries, Public Officials may request small "facilitation" payments to expedite routine, non-discretionary government actions such as permits, government visas, or regulatory approvals. Facilitation payments are illegal in many countries and are prohibited by this Policy. Employees must notify the Legal Department if they have received a request or demand for facilitation payment.

Payments made under a published expedited fee schedule, such as for example

expedited passport or visa fees, are allowed and are not considered facilitation payments. These payments do not include published expedited fees such as expedited passport fees, which are allowable.

#### **4.6 Political Contributions**

Political contributions cannot be made on behalf of Generac in any countries without the prior written approval of Generac's General Counsel.

#### **4.7 Engaging Third Party Representatives**

The definition of third-party representative is broad, and could include agents, distributors, dealers, consultants, and joint-venture partners. Third parties who act on Generac's behalf must always operate in accordance with this Policy. The FCPA and many other laws prohibit the payments of bribes directly by Generac and through third parties such as consultants, agents and other representatives. Accordingly, special care and due diligence must be exercised around the retaining of consultants, agents and other third-party representatives who assist Generac. It is imperative that Generac knows and keeps track of the third parties with whom it does business and through whom it offers its services.

Covered Third Parties who interact with Public Officials on behalf of Generac will undergo due diligence conducted by the Corporate Legal Department, with the following requirements:

- Obtaining evidence of the candidate's legitimate operations;
- Obtaining a business intelligence report, and conducting the following risk-based intelligence reports, as appropriate:
  - Undertaking local government records searches (e.g., company registries, credit reports, bankruptcy and litigation records);
  - Ordering an in-depth investigative report from a due diligence vendor;
  - Hiring an outside law firm, if necessary, to conduct a tailored review and provide a legal analysis of risks and proposed safeguards to mitigate risks.
- All agreements with a Covered Third Party must be in writing, reviewed by the Corporate Legal Department, and provide a specific scope of work;
- All agreements or contracts with third parties must contain language requiring compliance with applicable laws, including the FCPA, and provisions permitting the Company to conduct an audit of the books and records of the third party to assess compliance with anti-corruption laws;
- No payments may be made in cash, to third persons, or to bank accounts that are not in the third-party representative's name;
- Payments to third-party representatives may be made only in the country where the third-party representative is based or where the services are rendered.

**5. Violations and Discipline**

Any Covered Person who violates this Policy, conceals or destroys evidence of anyone else's violation or withholds information from or refuses to cooperate with an investigation of a possible violation will be subject to appropriate discipline, up to and including termination of employment, in accordance with the applicable national collective bargaining agreements and upon duly execution of the statutory disciplinary procedure.

**6. Obligation to Report**

Employees who may have a concern about potential or actual violations of this policy involving Generac or any of its representatives should promptly report the concern to the Corporate Legal Department or report through the Integrity Hotline, as outlined in Generac's Integrity Reporting and Hotline Policy. Generac will not retaliate or tolerate any retaliation against an employee who, in good faith, reports a concern.

**7. Policy Owner and Amendments**

Generac's Executive Vice President and General Counsel is the owner of this Policy. No amendments or changes to this Policy, or the removal of it, may be done without the prior written approval of the General Counsel or his/her designee(s).