



Anti-Bribery Anti-Corruption Policy

Dear Fellow Enovation Controls and Sun Hydraulics Employees:

Sun's commitment to compliance with all applicable laws and regulations of the U.S. and the other countries in which we do business is stated in our Corporate Philosophy and Ethics guidelines, which you can find on our website: [Sun Hydraulics Corporate Philosophy/Ethics](#) and [Enovation Controls Ethical Business Practices Policy](#).

This Anti-Bribery Anti-Corruption Policy (ABAC) supplements that philosophy with provisions directed specifically to anti-bribery anti-corruption laws and policies.

Compliance with Anti-Corruption Laws

Sun's commitment to acting with integrity includes compliance with all anti-corruption laws in the countries where it operates or does business. This includes compliance with the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act and other similar laws, which prohibit improper payments such as bribes and kickbacks, and promises and offers to make such payments to public officials.

Prohibition on Bribery and Kickbacks

Bribery is the act of giving something of value – including charitable donations, cash, travel expenses, gifts, offers of entertainment, and any other thing of value to the recipient – in order to obtain or retain business or any other improper advantage. Kickbacks are the return of a sum received, or due to be received, as part of an agreement to establish or foster business. Bribes, kickbacks, and offers to make such payments, are against Company policy, whether the person engaging in the prohibited conduct is employed by the Company or by a third party. Such third parties include distributors, customers, agents, consultants, brokers, joint venture partners and business partners of all kinds that are acting on our behalf or in connection with the Company's business.

Accordingly, you are not permitted under any circumstances to pay or receive bribes or kickbacks in connection with your conduct of the Company's business. This includes tips of any size, gratuities, holiday gifts, promotional gifts, charitable contributions, political contributions and anything else of value. You are also prohibited from engaging in any other activity that would similarly damage the Company's reputation or integrity.

This may sometimes be challenging, because in some parts of the world (including some places where we operate) making these kinds of payments is commonplace, or even expected. Even in those situations, it is essential that you adhere to Company policy and refrain from making such payments – even if it makes doing business more difficult. It is not a defense that “everybody does it.”

Business Partners

Just as you are not permitted to make improper payments, you are not permitted to employ or use third parties to do so. Our business partners are held to the same high ethical standards that we set for our own employees. If any of our business partners is found or even suspected of engaging in improper acts on our behalf or in connection with our business, those actions or suspicions must be reported to our Chief Compliance and Ethics Officer so that we may take appropriate action. Contact information for our Chief Compliance and Ethics Officer follows:

Craig Roser
SUN HYDRAULICS CORPORATION
Direct +1 941 362 1414
Mobile +1 941 799 9491
craig.rosier@snhy.com

Dealing with Government or Foreign Officials

You should exercise particular vigilance when dealing with government or foreign officials. The term “foreign officials” means officials of any government other than the United States. The term “government official” includes any person acting in an official capacity or on behalf of a government, or a governmental agency or department, including businesses with governmental ownership (such as a national oil company), a public international agency (such as the United Nations or World Bank), a political party or candidate for public office. If you are uncertain whether someone is considered a government or foreign official, consult the Chief Compliance and Ethics Officer.

Recordkeeping

Our commitment to compliance with anti-corruption laws extends to our recordkeeping. All Company expenses must be accurately recorded and supported by accurate documentation that clearly reflects the economic realities of the underlying transactions.

Acknowledgement, agreement and commitment to Sun’s Anti-Bribery Anti-Corruption Policy

This is an important policy that affects us all. Please acknowledge that you understand the policy, agree and commit to it, and then return your acknowledgement to Greg Glass, Sun Hydraulics, or Justin Bray, Enovation Controls.

Date: _____

Signature: _____

Printed name: _____

All employees required to sign

Sincerely,



Wolfgang Dangel
President and CEO



Philippe Lemaitre
Chairman of the Board