

An aerial, high-angle photograph of a city street at night. A person in an orange jacket is walking across a zebra crossing. The street is illuminated by streetlights, creating a pattern of light and shadow. The image is split diagonally by a black line, with the Vontier logo in the top right corner.

VONTIER™

# The Vontier Code

## Our Shared Commitment



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# Why This Matters

Dear Team,

At Vontier, we have the unique opportunity to build an industry-leading new business from a strong foundation. One element of that strong foundation that has been integral to our past success is our commitment to integrity and compliance. Carrying that commitment forward is as crucial to our future as our team and our world-changing innovations. We must remain dedicated to doing the right things the right way as we pursue our purpose of **mobilizing the future to create a better world**.

Our values are our compass here, as they are with everything we do. Our shared commitment to the Vontier Code of Conduct ensures that we are **Stronger Together**. Because being **Driven to Win** means doing our best for our customers, communities, and the world, considering the broader impact of our decisions and actions will keep us on the right track. We'll continue to develop new, better ways to operationalize these important principles because we always **Reimagine Better**. And we will be bold as we **Create What's Next**, but never at the expense of our integrity. Tying this all together is the **Vontier Business System**, our way of working and driving greater shareholder value.

The fundamental principle is simple: Act with honesty and fairness in all dealings on behalf of Vontier. I recognize that we operate in complex, international business and legal environments, and that this principle is not always simple to apply. We will face challenges—deadlines, metrics, an “easier way”—but we must withstand pressure to cut corners or make exceptions. The principles outlined here in the **Vontier Code of Conduct** must guide every product we manufacture, every customer and supplier relationship, every interaction and business decision.

Each of us has an active role in sustaining a strong culture grounded in integrity. We all must commit daily to acting fairly, honestly, and in compliance with all applicable laws. Our Code of Conduct is your road map, but it can't cover every possible scenario. It's up to you as the driver to stay the course and act in accordance with the underlying principles—and to Speak Up! whenever you have questions or concerns.

There are many people and resources available when questions arise, from your manager and Operating Company leadership to Legal & Compliance, Human Resources, and Internal Audit. The Speak Up! hotline is always available. Let's keep our determination to do the right thing, and the lines of communication open and active. Our future depends on it.

Thank you for the vital role you play in our shared success.

Mark Morelli  
President and CEO





# Who We Are

We are a global company focused on transportation and mobility. Our operating companies (OpCos) have industry-leading expertise in mobility infrastructure, retail and commercial fueling, fleet management, vehicle maintenance and repair, and smart cities, among other areas.

We are united by our purpose: **mobilizing the future to create a better world**. Our values and the Vontier Business System (VBS) power every aspect of our culture and performance.

- **Stronger Together.** We work as one diverse team—acting with inclusion, trust, agility, and integrity in all that we do.
- **Driven to Win.** We are passionate about winning. It motivates us to do our best for each other, our customers, our communities, and the world.
- **Reimagine Better.** We are never satisfied with “good enough.” We continuously strive for better in all we do.
- **Create What’s Next.** We have the courage to innovate and create bold, new solutions that deliver value to our customers and stakeholders.





# How to Use Our Code

Our Code is designed to provide high-level information about how to navigate everyday ethical situations. You'll find definitions for terms and links to people and policies, as well as real-world scenarios to give you the information you need to do the right things the right way.

**Our Code includes built-in interactivity to help you move around with ease. Use the toolbar at the top of each page to:**



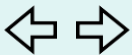
*Return to the Table of Contents, where you can access any section of our Code in one click.*



*Go directly to [Speak Up!](#) if you want to share a concern or ask a question.*



*Return to the last page viewed.*



*Page-forward or back.*



*Searching for specific information? Just visit the Index or press Ctrl+F to access the Adobe Acrobat search tool and enter a term in the window.*

**Underlined teal text** is clickable and will either connect you to a resource or deliver more detailed information about a topic.

**Important note:** You may have heard the term “Standards of Conduct” in the past or see it in legacy documents. At Vontier we call it our Code of Conduct, or more simply our **Code**.





# Why We Have a Code

**Our Commitment.** We work together to promote an ethical and compliant workplace. That means speaking up about issues and concerns that could harm our company's reputation or jeopardize the good work we're doing.

**Everyday Actions.** As employees, we courageously face problems head on and promptly report any behavior that we believe violates our values or our Code, knowing that Vontier will not tolerate retaliation.

Sometimes, you might face a situation where the right thing to do is not obvious. That is where our Code of Conduct can help. It is always here as your guide to preserving our reputation and living our values. While the Code cannot answer every question, it can show you where to go for guidance when the answer is not clear.

## Uphold the Law

Laws and regulations can vary widely from country to country. Because our Company is incorporated in the United States, our employees around the world often are subject to U.S. law in addition to the laws of the country where they work. Because we operate globally, knowing which laws to follow can be complicated, so be sure you know the laws and regulations related to your job in the country (or countries) where you do business. In cases like these, follow the law and our Code. When questions arise, contact a member of the Legal & Compliance team.



### How Can the Code Help You?

*The Code enables you to...*

- *Conduct yourself honestly and with integrity.*
- *Uphold our values and protect our reputation.*
- *Understand what Vontier expects from you.*
- *Make good decisions every day.*
- *Comply with the laws, regulations and standards that apply to our Company.*
- *Understand where to go for assistance or guidance if you have questions.*





# Who is Covered Under the Code

Our Code applies to all employees of Vontier worldwide. It is your individual responsibility to ensure that you read, follow and comply with it. Committing to following the Code and acting consistently with our values will build trust, earn respect and lead to our success.

We also expect our agents, representatives, independent contractors, consultants, suppliers, business partners and others working on our behalf to act with the same high standards of conduct described in our Code.

**“VONTIER” includes ...**

*Vontier and each of our OpCos around the world.*







# What You Need to Do

Usually, if you follow the Code and stay true to our values, the right thing to do will be clear, but there may be situations where it isn't. In those situations, we count on you to use your best judgment and seek guidance from your manager, HR, Legal & Compliance, Internal Audit or [Speak Up!](#) if necessary.



## As employees, each of us has as a responsibility to ...

- **Know and live the Code.** *Read it and follow it, along with any other policies that apply to your job.*
- **Think before you act.** *Use good judgment and be honest and ethical in every action you take. Report the concern as soon as possible using the resources available to you.*
- *Follow the law. Understand laws that apply to your job and our business. If you are ever unclear about a law or regulation, contact a member of the Legal & Compliance team.*
- *Ask for help. When an answer is not clear, ask for guidance before taking action.*
- **Stay alert.** *Pay close attention to any activity that is inconsistent with our Code, our policies or the law.*
- *Report concerns immediately to your manager, HR, Legal & Compliance, Internal Audit or through [Speak Up!](#) Do not ignore a violation.*



## What Would You Do?

*You believe that a local law might conflict with a part of our Code.*

## What Should You Do?

We operate around the world and are subject to many different laws. Our Code is designed to complement—not conflict with—the laws in the countries where we conduct business. If you believe you face a conflict, generally follow the stricter requirement.

But if you have any questions about the correct action to take, contact a member of the Legal & Compliance team before moving forward.





# Manager Responsibilities

**Our Commitment.** We believe that managers who are both positive role models and work with integrity inspire others to do the same.

**Everyday Actions.** We look to our managers to inspire their teams by setting a positive tone, demonstrating integrity, and promoting compliance with our values and our Code.

**Lead by Example.** If you lead others at Vontier, make a connection between daily work and our values, our Code and our success—answer employee questions, address their concerns and demonstrate through your words and actions that there is no difference between what you expect of yourself and what you expect of others. Model the behavior.

**Maintain an Open and Transparent Culture and Attitude.** Create and maintain the kind of workplace where all feel safe and comfortable coming forward with questions and concerns, and support those who raise issues. Treat the information they share with care, disclosing it only to those who have a need to know as you work to find a solution.

**Be Responsive and Create a Speak Up! Culture.** Support those who raise concerns and ensure that others do the same. It's part of our commitment to an open and transparent culture and to continuous improvement.

**Understand Your Obligation.** Immediately raise any concern that potentially violates our values or our Code to your manager or supervisor or [Speak Up!](#) Don't look the other way.



## What Would You Do?

*You are a manager and an employee on a different team comes to you with an allegation of misconduct that the employee believes could be a violation of the law. They are worried about causing a problem in their group.*

## What Should You Do?

You are primarily responsible for employees and third parties under your supervision, but as a leader, you have a special duty to act, no matter who comes to you. The best approach would be to get some initial information from the employee raising the concern—the who, what, why, when and where—then [Speak Up!](#)

Ensure the employee raising the concern knows that they can remain anonymous, or with their identity known only to a critical few. Remind them of our zero-tolerance policy on retaliation. By speaking up, you ensure that the issue is reviewed by those with the appropriate subject matter expertise to provide guidance.



# How to Make the Right Decision

At Vontier, we do the right things the right way. We recognize that sometimes, the right thing is not always clear.

### Ask yourself these questions

- Is it consistent with our **Code**?
- Is it legal?
- Does it follow our policies?
- Does it benefit the company as a whole — not just a certain individual or group?
- Would I be comfortable if my actions were made public?

If you can answer “**yes**” to all of these questions, the action is probably **ok**.

But any “**no**” or even “**maybe**” answers are a signal to stop and get advice or ask questions.

**It is always better to ask before you act, especially when you are not sure.**

Contact any of these resources or any of the resources referenced in the [Vontier Escalation Policy](#):

HR

Your Manager

[Legal & Compliance](#)

Internal Audit

[Speak Up! Helpline](#)



# Speak Up!

When you report concerns, you help us handle issues properly, fix problems before they occur and remedy situations that have already happened. You also help build trust with each other and with our customers, our suppliers, our shareholders and other business partners.

## Take Responsibility.

If you have questions about the right thing to do, or if you see something that doesn't seem right, talk to your manager or any of these other resources:

- Another manager or supervisor
- Human Resources
- Legal & Compliance
- Internal Audit

You may also contact [Speak Up!](#), a resource you can reach online or via phone to raise a concern 24 hours a day, 7 days a week. Dedicated phone staff speak over 20 languages, and you may report anonymously, unless prohibited by local law. Vontier thoroughly and professionally investigates all allegations of misconduct, disclosing information only on a “need to know” basis in accordance with applicable law in order to solve the issue.

Although [Speak Up!](#) is always available, there may be some issues that are best addressed with your manager or Human Resources first, such as performance management and employee relations matters.



## If you are contacted about a [Speak Up!](#) investigation, you need to cooperate.

- *Follow any guidance received from your Legal & Compliance team*
- *Keep the investigation and any specifics confidential and do not discuss them with any other employee*
- *Make yourself available for an interview as requested*
- *Provide open, honest and transparent answers and any supporting documents*

## Don't Fear Retaliation.

Regardless of the resource you contact, know that your concern will be handled promptly and appropriately. Vontier absolutely prohibits retaliation against anyone who makes a report or participates in an investigation. We want you to feel as comfortable as possible in coming forward, knowing that we want to hear from you and that you're doing the right thing.





# Speak Up!



## What Would You Do?

*You have a concern you'd like to discuss with someone in Human Resources, but your manager has advised that all issues should be discussed with her first.*

## What Should You Do?

It's generally a good idea to start with your manager or supervisor—they are often in the best position to understand your situation and take the right action. But if you don't feel comfortable talking to your manager, you are free to contact Human Resources directly or [Speak Up!](#) Your manager should not limit your access to these resources.



## What Happens When You Report a Concern

- *You may choose to remain anonymous, where permitted by law. If you do give your name, we will do all we can to protect your identity consistent with conducting a thorough investigation.*
- *We take every report seriously and will investigate it thoroughly and as confidentially as possible.*
- *We expect everyone involved to cooperate fully and honestly.*
- *If it is determined that our policies or the Code have been violated, fair and consistent disciplinary action and/or other countermeasures will be taken in accordance with applicable law. Additionally, even if there is no violation of our policies or the Code found, we will sometimes implement countermeasures to help improve our processes and procedures.*





# Treating Each Other with Respect

**Our Commitment.** We believe that every employee should be treated with respect and dignity. We provide training for our employees on harassment and discrimination, and disciplinary action will be taken against any employee who engages in harassment or discriminatory behavior, up to and including termination of employment.

**Everyday Actions.** Because we are **Stronger Together**, we promote the kind of workplace where we can do our best work—free of harassment, bullying or abusive treatment.

**Honor Our Commitment.** Be aware that harassment takes many forms. It can:

- Be physical, verbal or written
- Occur in the workplace or at work-related functions or settings
- Be inflicted by—or directed at—employees, but also customers and business partners
- Be sexual in nature, or non-sexual, and directed at the same or opposite sex
- Include behavior such as:
  - » Offensive or derogatory remarks, jokes or images
  - » Unwelcome touching or sexual advances
  - » Racial slurs or name-calling

Regardless of the form it takes, harassment is prohibited at Vontier. If you suffer harassment or suspect harassment of others, **Speak Up!** You will not be retaliated against for sharing your concerns.



## What is “Harassment”?

*Any unwelcome conduct toward another person that creates an intimidating, hostile or offensive work environment.*





# Treating Each Other with Respect



## What Would You Do?

*A co-worker confides in you about her manager who makes suggestive comments about her appearance and, despite prior refusals, continues to ask her out on dates. She is obviously uncomfortable but says she does not want to report it. Should you respect her wishes?*

## What Should You Do?

Encourage your co-worker to raise the issue through any of the [Speak Up!](#) resources available. She can raise her concerns anonymously if she prefers.

It is important for the right resources to be made aware of the concerns to ensure we maintain our commitment to a safe and respectful workplace.

If your co-worker does not raise the issue herself, you must raise it.

You and she can take comfort in our commitment to zero tolerance for retaliation.







# Inclusion, Diversity & Equity

**Our Commitment.** We are building a community where everyone belongs—where you can speak your mind, be yourself and feel supported. It's how we achieve more together; for each other, for our customers and for the world.

**Everyday Actions.** We are **Stronger Together**, and we all have a role in building a community of inclusion and belonging. Consciously put together diverse teams. Actively seek out different opinions. Be open to different viewpoints and ways of doing business.

**Enable Our Diverse Talent to Drive Our Innovation and Success.** Our workplace—as well as our products and services—benefits from our diverse backgrounds, experiences and knowledge. Respect the viewpoints and cultural differences of employees, business partners and customers, and work together as a team to deliver our very best.

**Put the Focus on Fairness.** We have zero tolerance for discrimination. Treat everyone fairly, respectfully and with dignity. Make decisions based on job requirements and individual qualifications, without regard to race, color, national origin, religion, sex, age, marital status, disability, veteran status, sexual orientation, gender identity, gender expression or any characteristic protected by law.



## What Would You Do?

*A co-worker frequently insults another member of your team. She makes you and others on the team very uncomfortable.*

## What Should You Do?

A respectful workplace starts with the everyday actions that each of us take on the job. If you become aware of a situation like this one, which is inconsistent with Vontier's commitment to inclusion, diversity and equity and to a professional and respectful workplace, be proactive.

Have a conversation with the co-worker and share your concerns, if you are comfortable doing so. Although this can be hard, starting these conversations and understanding one another is how we learn and grow.

If you're not comfortable approaching her directly, raise your concerns to your manager, HR, Legal & Compliance or [\*\*Speak Up!\*\*](#)



# Safety & Security

**Our Commitment.** We promote a culture of safety and value the well-being of every employee in all ways, beyond just their physical safety. The well-being of our workforce isn't a one-team or one-time responsibility, but a universally shared, everyday commitment.

**Everyday Actions.** We follow all health and safety requirements. We always **Reimagine Better**, looking for opportunities to improve the safety of our people and workplace.

**Do Your Part.** Take an active role in ensuring your own safety and the safety of others by completing any safety training that is assigned to you and complying with the safety requirements that apply to your role. If you become aware of any potentially hazardous condition or unsafe practice, immediately report it to your manager or supervisor or **Speak Up!** Raise your hand if you see an opportunity to improve our safety practices, even if the current one does not rise to the level of a violation.

**Be at Your Best.** Substance abuse can negatively affect job performance and put you, your co-workers and others at risk.

That's why we:

- Prohibit illegal drugs on company property
- Prohibit being under the influence of any drug or alcohol during working hours

There may be company-sponsored events where drinking alcoholic beverages is permitted—in those instances, make sure your behavior reflects our values and our Code. Always use good judgment and practice moderation.

We do not tolerate any actions that threaten employees, customers, suppliers or others. Weapons are not permitted at any time on property operated by any OpCo unless permitted by law and company policy.



## What Would You Do?

*Your co-worker suggests adopting a practice that will significantly save time and money—but it poses a small safety risk. Should you take a chance?*

## What Should You Do?

While we are committed to continuous improvement and open to new ideas and ways of doing things, human safety is most important. Any potential process changes should first be assessed for safety.



## Learn More

[Environmental, Health and Safety \(EHS\) Policy](#)

[Escalation Policy](#)





# Fair Competition

**Our Commitment.** Innovative thinking and groundbreaking advancements—that's what drives our success. We believe that everyone benefits from an open and competitive marketplace.

**Everyday Actions.** We are **Driven to Win**, but we always act fairly, and in compliance with our values and our Code. We avoid actions that could limit competition or prevent others from competing.

**Avoid Improper Agreements.** We compete vigorously and fairly for business. As a result, we don't enter into any agreements or understandings, written or oral, formal or informal, with competitors or others to:

- “Fix” (raise, set or hold) prices on our products or services
- Split up territories, markets or customers
- Prevent a company from entering the market
- Refuse to deal with a customer or supplier
- Restrict production, sales or output
- Interfere with the competitive bidding process

**Be Careful.** Use good judgment when dealing with competitors or others at industry meetings, seminars and conventions. Don't discuss any competitively sensitive topics, and if others try, take prompt and clear action: stop the conversation, leave the room, document what happened and report it to the Legal & Compliance team.

**Gather Competitive Intelligence the Right Way.** Get information about our competitors fairly and legally—for example, through internet searches, media sources and industry articles—never through deception or fraud. Don't ask new employees for competitive intelligence—they have an obligation to protect their former employers' confidential information, just like our former employees have an obligation to protect ours.







# Fair Competition



## What is a “competitively sensitive topic”?

- Pricing and terms of sale
- Costs and profits
- Customers, territories and markets



## What Would You Do?

*At a trade association meeting, a competitor approaches you, strikes up a conversation, and casually comments, “The market seems like it’s softening—is that what you’re seeing?” How should you respond?*

## What Should You Do?

Comments like these may sound harmless, but could point to anticompetitive intent or motives. The best action would be to let the competitor know that this kind of discussion is inappropriate, then excuse yourself and report what happened to your manager and the Legal & Compliance team to determine next steps.



## Learn More

[Antitrust Policy](#)





# Anti-Bribery & Anti-Corruption

**Our Commitment.** We win based on our innovation, products and services. Corruption and bribery are inconsistent with our value of fairness and are never a part of the way we do business.

**Everyday Actions.** We have the courage to confront issues that are inconsistent with our values. We do not try to influence business through inappropriate means. We believe that our products and services will win on their own merits. We are **Driven to Win**, but we insist on winning business the right way.

**Follow Our Values.** Don't give or accept anything of value in order to win (or keep) business, influence a decision or gain a business advantage. Follow global anti-corruption laws and our policies. Be aware that these laws apply globally, not just in the United States, and cover not only Vontier employees and contractors, but also third parties working at our direction or for our benefit, such as channel partners, distributors, sales agents and consultants.

Remember to execute according to the [Channel Partner Toolkit](#); it will help you select the right business partners who represent our values. Ask questions any time you're unsure of what's required and take care to record all financial transactions fully, accurately and transparently.

**Watch Your Interactions with Government Officials.** We may interact with government officials on issues other than the sale of our products. This includes audits, inspections, licenses, customs and regulatory approvals. See the [Interacting with Governments](#) section for additional guidance in these areas. Also remember to check with the Legal & Compliance team before providing anything of value to a government official or employee, as in some cases they are prohibited or restricted. See the [Gifts, Business Entertainment & Travel](#) section for more information.



## What is "Anything of Value"?

*It means "anything"! And it can be something other than a cash payment, including:*

- A gift
- Travel or meals
- Service agreements
- A proposed partnership
- A loan or favor
- A charitable donation or political contribution
- A job offer for a close relative





# Anti-Bribery & Anti-Corruption



## Who is a “Government Official”?

*The term is broad and includes:*

- *Government employees*
- *Military officials*
- *Elected officials or candidates*
- *Members of political parties*
- *Employees of state-run, state-owned or state-subsidized industries*

*If you're not sure if an individual is a government official, check with the Legal & Compliance team.*



## Learn More

[Anti-Corruption Policy](#)

[Channel Partner Toolkit](#)

[Escalation Policy](#)







# Gifts, Business Entertainment & Travel

**Our Commitment.** We believe exchanging business courtesies is a normal part of working with our customers and business partners—but we don't let it influence our actions or use it to try to improperly influence others' actions.

**Everyday Actions.** We make sure that we don't give or receive anything that might result in improper influence or reflect poorly on our organization or others.

**Know What's Acceptable.** When has a business courtesy gone too far? Our [Gift & Entertainment Policy](#) will tell you. It sets limits on the value of gifts that may be given or received as well as requirements you must follow when offering or accepting gifts or business entertainment.

**Know What's NOT Acceptable.** Some offers are never acceptable. In general, if a gift or entertainment places you under some obligation or could influence your decision-making, it is not appropriate.

## GIFTS & BUSINESS ENTERTAINMENT

### OK



*Are modest in value*



*Are given only occasionally*



*Further a legitimate business relationship*



*Are permitted by law*



*Comply with the policies of both the giver and receiver*

### NOT OK



*Are intended to influence a decision or action*



*Are excessive or lavish*



*Could embarrass Vontier*



*Are inappropriate or in bad taste*



*Are solicited (e.g., someone asks for something)*



# Gifts, Business Entertainment & Travel

**Comply with Our Travel Policies.** Sometimes, the best way to demonstrate our capabilities is to invite a customer to an OpCo facility so they can see our products and services for themselves. If the OpCo pays for the trip, there are very specific requirements that must be met and pre-approvals that must be obtained. Make sure to read our [Customer Trip & Entertainment Policy](#) and complete a [Customer Trip Approval Form](#) before you extend an offer to pay for third-party travel. In particular, review the policy before agreeing to pay for the travel of government officials.

**Be Transparent.** You must document any business courtesies given or accepted accurately and completely in our books and records.



## Interact with Government Officials

*The rules for what you may give to (or accept from) government officials are very strict. Know any applicable OpCo policies and requirements that address gifts involving government officials.*



## What Would You Do?

*You just got a delivery at the office. It was an expensive thank-you gift from a grateful vendor. You're pretty sure our policies won't allow you to keep it. What steps should you take?*

## What Should You Do?

Return the gift and politely explain that accepting it is inconsistent with our policy requirements. If this is not practical, discuss it with your manager and the Legal & Compliance team. Other options may include donating the item to charity or leaving it in a common area of the office for all to enjoy.



## Learn More

[Gift & Entertainment Policy](#)

[Customer Trip & Entertainment Policy](#)

[Customer Trip Approval Form](#)



# Advertising and Marketing

**Our Commitment.** We build long-term customer relationships by demonstrating honesty and integrity in all of our interactions.

**Everyday Actions.** We're **Driven to Win**, which means doing what's best for our customers. We work to understand their needs, provide accurate information about our products and services and truthfully and appropriately advertise and market our solutions.

**Preserve Trust.** Provide truthful and complete information about the quality, safety, features and availability of our products. Misleading our customers, exaggerating what our products can do, promising something we can't deliver? These actions can cause us to lose trust and are never OK—that's not how we do business.

**Know What's Required.** Know and follow the requirements that cover how we market and sell our products. Make sure any claims about our products are supported by facts and that written and visual descriptions accurately describe our products.



## What Would You Do?

*After months of relationship-building, one of your customers is ready to sign a contract. But in your eagerness to make the sale, you talked about some benefits associated with the product that have not yet been verified. Do you correct the information and risk losing the sale?*

## What Should You Do?

Yes. Any claims we make must be truthful and substantiated. You need to be honest about product features and benefits. If the customer signs the contract and later discovers that you weren't truthful or that the product doesn't deliver the benefits you described, it will not only hurt the business relationship, but also jeopardize the trust they've placed in your OpCo.







# Working with Business Partners

**Our Commitment.** We recognize that our relationships with suppliers, channel partners and other third parties are critical to our success—so choose business partners who meet our high standards.

**Everyday Actions.** We are **Stronger Together** when we act with integrity and transparency and require that our business partners do the same.

**Choose Carefully.** If you are involved in selecting a Vontier business partner, follow our internal processes, including conducting due diligence. Make decisions based on our company's needs and on factual standards such as price, quality and service—never on personal bias, benefit or interests. Remember, the actions of our business partners reflect on Vontier, so make sure they understand our expectations and operate ethically and in a way that reflects our values and our Code.

**Hold Our Partners Accountable.** Our [Supplier Code of Conduct](#) lays out the expectations we have for our business partners. For certain business partners, the [Channel Partner Toolkit](#) applies. Know when and for which third parties it applies and follow it.

If you manage or work with our business partners as part of your job, monitor their contracts and performance and:

- Be honest and accurate in your business dealings
- Protect their confidential business information with the same care as you protect ours
- Avoid any potential [conflicts of interest](#)
- Maintain high expectations—be especially alert to [human rights abuses](#) and acts of [bribery or corruption](#)
- Always [Speak Up!](#) if you suspect a business partner of violating our Code or values



## What Would You Do?

*A supplier you've worked with for many years approaches you to talk about partnering on a new business venture. It seems like a good opportunity and it has nothing to do with your job at Vontier—is it OK to meet with her and explore it?*

## What Should You Do?

Probably not. Consider how this business venture might be perceived by others, especially if you make decisions about the supplier relationship on behalf of Vontier.

Talk to your manager or supervisor before agreeing to meet with the supplier. Transparency about potential conflicts of interest, or even the appearance of a conflict, is always the right course of action.

For more information, see the [Conflicts of Interest](#) section.



## Learn More

[Supplier Code of Conduct](#)

[Channel Partner Toolkit](#)





# Import, Export & Trade Compliance

**Our Commitment.** We respect global laws that cover the import and export of our products.

**Everyday Actions.** We know and follow the import/export requirements that apply to our business and our jobs, no matter where we work or conduct business, documenting each transaction honestly, accurately and completely.

**Comply with Economic Sanctions, Export Controls and Anti-Boycott Rules.** The United States and other countries enforce economic and trade sanctions, which means they may limit the places where we can do business, the people with whom we can do business and the products that we can sell. They may also require a specific license to sell or ship our products. If you have a question about whether these laws apply, reach out to the Legal & Compliance team.

Also contact one of these resources if you are asked to comply with a foreign boycott. Vontier and our employees individually may be liable for participating in, supporting or agreeing to comply with a foreign boycott. And certain boycott-related requests may need to be reported to the U.S. government, even if we don't participate or respond.

**Ensure Import Compliance.** We are required to provide an accurate statement of what we are importing and the customs duties associated with each item. Again, the Legal & Compliance team are your resources—contact them if you have a question regarding import compliance or your role in the process.



## What Would You Do?

*You have received a request from a customer to alter an invoice to show a different final destination. What should you do?*

## What Should You Do?

We are required to declare imports and exports accurately and transparently. Make sure the invoice is accurate—not altered. Contact your local trade compliance representative, Vontier's Global IMEX Trade Compliance Director, or the Legal & Compliance team about the request to determine appropriate next steps.



## Learn More

[Import Policy](#)

[Export Policy](#)

[Escalation Policy](#)





# Product Quality

**Our Commitment.** We are committed to the development of safe, dependable products and meeting the quality expectations of our customers.

**Everyday Actions.** As we **Create What's Next**, we leverage VBS to build quality into everything we do and follow the processes we have in place.

**Put Quality First.** If you are involved in product design, development, production, testing, labeling, packaging, localization, qualification or certification, make sure that in the places where they are produced and markets where we sell them, our products and services:

- Are manufactured in compliance with all applicable quality, safety and effectiveness requirements
- Meet all marking, packaging and documentation requirements
- Meet all requirements for safety registrations, inspections, pre-qualifications, clearances and processes

**Meet or Exceed Expectations.** Know and comply with all regulatory requirements that relate to the manufacture and sale of our products in the countries where you operate. Failing to meet these requirements risks not only losing sales, but also losing the trust of our customers and shareholders.

**Promote Continuous Improvement.** If you identify any gaps, it's important to determine the root cause, establish countermeasures and continuously improve processes to prevent it from happening again. Questions or concerns about the quality or safety of our products should be directed to your manager or supervisor, the quality or product compliance function at your OpCo or [Speak Up!](#)



## What Would You Do?

*You are facing a deadline and your manager directs you to use a new vendor that is not approved to complete the project. The vendor seems qualified. Do you hire the vendor?*

## What Should You Do?

No. We only work with approved vendors to ensure quality. Let your manager know that this vendor is not approved for use, or take the appropriate steps to establish the new vendor as an approved vendor. If you don't feel comfortable discussing the situation with your manager directly, then [Speak Up!](#)





# Company Assets

**Our Commitment.** We provide employees with the facilities, equipment and resources they need to do their jobs—we expect everyone at Vontier to use them responsibly.

**Everyday Actions.** We use company assets for company business and protect them from theft, fraud, waste and misuse. We also **Reimagine Better** by anticipating and mitigating new threats to our assets.

**Protect Our Physical Assets.** From raw materials and machinery to office equipment and company cars, Vontier's physical assets help us create, build and deliver a powerful portfolio of products for our customers. Comply with our policies and never lend, sell or give away these assets unless you're authorized to do so.

**Protect Our Information Assets.** Treat all of our information—whether written, electronic or verbal—with care. Use it as allowed by our policies, and know the higher standard of care required for [Privacy & Data Protection, Confidential Information & Intellectual Property](#).

**Protect Our Electronic Assets.** Our hardware, software and networks help drive our innovation and are provided for business purposes only. Use our technology responsibly and protect it from threats and bad actors (see the [Cybersecurity](#) section of our Code). Never use it for unauthorized, unprofessional or illegal purposes. Limited personal use of assets such as your laptop and phone is permitted (for example, for checking the news), but make sure your use is consistent with our values, and doesn't interfere with your work or our business.

For more information, see our [Acceptable Use Policy](#). Be aware that any information you create, share, store or download onto our systems belongs to Vontier, and we may audit networks and systems to ensure compliance with our policies.



## What Would You Do?

*You stopped by a co-worker's desk to ask a question and noticed that he was looking at a website with pornographic content. Your co-worker sees the look of surprise on your face and tells you not to worry, that he only goes on these kinds of sites occasionally and never shares them with others. Is that OK?*

## What Should You Do?

No. Our systems should never be used to access inappropriate websites or information. Share your concerns with your manager or supervisor or [Speak Up!](#)



## Learn More

[Acceptable Use Policy](#)







# Confidential Information & Intellectual Property

**Our Commitment.** Information drives every aspect of our business and helps us stay strategic and competitive in the market—we recognize the critical obligation we have to protect it.

**Everyday Actions.** We are alert to—and intentional about—safeguarding our information assets, as well as the information assets that others have entrusted to us.

**Know What's Confidential.** Confidential information can take many forms, including:

- ✓ Information about our company—such as new product research, product specifications and designs, customer lists and business plans
- ✓ Information about people—such as an address or location, phone number, credit card or account number, benefit information, compensation, social security or employment information, or device identifier (see the [Privacy & Data Protection](#) section to learn more)
- ✓ Information about or received from other companies that we've agreed to keep confidential

**Take Precautions.** Label confidential information according to our policies so others understand the sensitivity of it. Before you share confidential information with anyone (inside or outside of Vontier), make sure:

- You are authorized to share it
- You're sharing it with someone who is authorized to see it and has a business need to know it
- You're limiting the amount of information shared to only what's required
- Any third party you're sharing with has been vetted and approved to receive the type of information and has a contractual relationship with us such as a signed services agreement or a confidentiality or non-disclosure agreement

Never discuss confidential company business or information in public places such as elevators, planes or restaurants where others could hear it.







# Confidential Information & Intellectual Property

**Protect What Makes Us Who We Are:** Inventions, ideas, software code, trade secrets and original work created by our employees—examples of our intellectual property (IP)—represent years of innovative thinking and a significant investment of time and resources. Follow the policies and procedures we have in place to identify and protect it. Your responsibility to protect IP also extends to any IP shared with us by our business partners and other third parties—respect their work and ensure you never violate their rights.



## “Intellectual Property” includes:

- *Patents*
- *Trademarks*
- *Copyrights*
- *Trade secrets*
- *Data/data analytics*

*Unless disclosed and/or explicitly allowed, Vontier owns any work product (including an idea, process, invention or improvement) that you develop or design or reasonably expect to develop or design (1) in connection with your work with us; (2) if it relates to technology that any of the Vontier companies are developing or selling; or (3) using Vontier resources.*



## What Would You Do?

*You're new to Vontier, but have some great marketing insights based on your work at a former employer. Is it OK to share it with your new team?*

## What Should You do?

If the information is confidential information, it is not OK to share it. You are required to protect your past employer's confidential information in the same way that you are required to protect Vontier's information if you should leave your job here. However, you can use general marketing knowledge and insights gained over time that are not confidential. If you have any questions, contact your OpCos or Vontier's Legal & Compliance team.



## Learn More

[Intellectual Property Policy](#)

[Escalation Policy](#)





# Privacy & Data Protection

**Our Commitment.** We respect the personal data of others and are committed to using it responsibly and safeguarding it from unauthorized disclosure and data breach.

**Everyday Actions.** We comply with the data privacy and security laws of the countries in which we operate and are transparent about how we process the personal data of data subjects. We continuously **Reimagine Better**, working together to develop processes that meet new data protection requirements and enrich our customers' experiences.

**Know What's Required.** Data privacy laws and regulations (including the EU General Data Protection Regulation) and our policies describe how an individual's personal data should be properly collected, used, transferred, stored and disposed. If you handle personal data, make sure you know what's required and treat it with the appropriate level of care.

Among other things:

- Collect data only through lawful and fair means, and where appropriate, with the knowledge of the data subject
- Use it only for legitimate business purposes and for approved uses
- Collect no more data than is needed to do the job
- Share it only with people—inside or outside of Vontier—who are authorized to see it and only as permitted by law. Take additional steps if personal data will be provided to a third-party vendor hired to support our work
- Use appropriate security safeguards to protect personal data against the risk of loss or unauthorized use, modification, destruction or disclosure

**Report Suspected Data Breaches Immediately.**

If you believe that personal data has been viewed, used, accessed, disclosed/shared, or made available improperly, report your concern immediately to your manager or supervisor or [Speak Up!](#)



## What Would You Do?

*You work in account management and oversee many billing and credit card transactions. As you process paperwork, you are careful to put all personal data in a single pile on your desk with a cover sheet that's labeled "shred."*

*Then, once a week you take the pile to the secure shred container to ensure proper disposal. Are you meeting your obligation to protect personal data?*

## What Should You Do?

Probably not. Unless you are in a private office that you lock every time you leave your work area, this information could be visible to others and vulnerable to breach.

To meet our standards, you should lock the information in a secure location in your work area or dispose of the information in the secure shred container immediately.



## Learn More

[Personal Data Protection Notice](#)

[Escalation Policy](#)



# Cybersecurity

**Our Commitment.** Technology applications and connectivity are more powerful than ever before. And the associated risks have never been greater. We understand our critical duty to keep our data, networks and systems secure.

**Everyday Actions.** We are proactive. As we deploy technology to **Create What's Next** and drive efficiencies in our work, we leverage our VBS toolset to put the proper safeguards in place. We remain alert to situations that could expose Vontier to cyberattacks.

**Understand the Reputational Risk.** Clicking on a suspicious link, leaving a password on a sticky note, not updating antivirus software—these are just some examples of the many ways that hacks and breaches can happen.

**Be Cyber Aware.** If you have any questions about how to keep your device safe, or if you detect any suspicious activity, share your concerns immediately with the Vontier Information Security team by emailing [Infosec@vontier.com](mailto:Infosec@vontier.com).



*The best way to keep our systems safe is to follow our policies, use good judgment and observe good cybersecurity practices:*

- *Create strong passwords and don't share them with anyone else, even if asked*
- *Ensure the physical security of information and hardware assigned to you*
- *Access our networks only through authorized applications and devices*
- *Keep your systems, browser and antivirus software current—update them when directed to do so by Vontier's Information Security team*
- *Be careful about:*
  - » What you click—be alert to phishing scams
  - » What you share—encrypt confidential information as appropriate
  - » What you download—steer clear of suspicious files, software or email that can introduce malicious code







# Cybersecurity



## What Would You Do?

*You receive an email indicating that there is unusual log-in activity on your work account. It's not clear from the email if it's from your IT Department, but there is a link in the email that you can click on to find out more details. What are your next steps?*

## What Should You Do?

Don't click on the link. This could be a phishing scam designed to obtain sensitive information about you or to gain access into our company systems. Forward the suspicious email as an attachment to Vontier's Information Security team at [Infosec@vontier.com](mailto:Infosec@vontier.com). They will tell you what to do. Even if an email looks legitimate, it's always appropriate to check before you click.



## Learn More

[Incident Response Plan](#)

[Escalation Policy](#)





# Conflicts of Interest

**Our Commitment.** We are people with interests, activities and relationships outside of work, but we don't let them interfere with business decisions we make as Vontier employees.

**Everyday Actions.** We are transparent about situations that may put our interests or those of a close friend or family member in potential conflict with Vontier's interests, and we ensure that our actions on behalf of Vontier are beyond question.

**Be Proactive.** The best way to avoid a conflict of interest is to know and avoid the kinds of situations where they can occur.

**Disclose.** If you think you may have a conflict or the appearance of one, be open, transparent and proactive by discussing the situation with your manager immediately. Most conflicts can be avoided or mitigated if they are promptly disclosed. However, failing to disclose an actual or potential conflict could cause a loss of trust and make the situation worse.



## What is a "Conflict of Interest"?

*A conflict of interest can happen when your personal interests (or the interests of a family member) interfere—or even appear to interfere—with the interests of Vontier.*

### Ask yourself:



Could this situation interfere with my Vontier responsibilities or appear to?



Might it appear to affect the decisions I make on behalf of Vontier?



Would this look like a conflict to someone else?

If the answer to any of these is “**yes**” or “**I’m not sure**,” there may be a potential conflict, and you should seek guidance from your manager, HR, Legal & Compliance, or [Speak Up!](#) before proceeding.





# Conflicts of Interest



**It's not possible to list every potential conflict, but some of the more common ones are:**

- *Having a financial interest in a company that buys from or sells to Vontier*
- *Taking a second job working for a competitor or a company that conducts business, or wants to conduct business, with Vontier or its customers*
- *Holding a position at Vontier that allows you to hire, promote, supervise or influence career decisions of family*
- *Using your position at Vontier to gain a personal benefit not available to all employees, like a special discount or loan*
- *Using Vontier property, resources or information to support a personal interest or taking an opportunity for yourself that belongs to Vontier*
- *Taking a role with another company as a director, officer or advisor that interferes with your obligations to Vontier*
- *Having a romantic relationship with someone who you supervise or otherwise influence their performance evaluation and/or compensation*



## What Would You Do?

*One of your suppliers asks if you would be interested in doing a little work “on the side.” You could use the money and could do the work after hours so it wouldn’t interfere with your job at Vontier. Should you ask for guidance before accepting the job?*

## What Should You Do?

Yes. This opportunity creates a potential conflict of interest. Even if you don’t have any control over whether we conduct business with this supplier, working for both Vontier and a Vontier supplier puts you in a situation of divided loyalty. Work “on the side” could influence our business relationship with that supplier and cause others to question your ability to make objective business decisions on Vontier’s behalf.

Always remember that the perception of a conflict can erode trust and be just as harmful to our reputation as an actual conflict. It may be possible that you and your manager are able to agree on guidelines that would enable you to take on this additional work, but only if you first ask.





# Financial & Business Records

**Our Commitment.** We understand that accurate and complete records not only drive good business decisions but also help us maintain the trust of investors, government regulators and other stakeholders.

**Everyday Actions.** As we meet our objectives because we are **Driven to Win**, we recognize the responsibility we all have to document information correctly and to give a clear and complete picture of every transaction.

**Maintain Honest and Accurate Records.** The integrity of our records is not simply the job of our Finance team; it's the job of every employee. Follow our policies, processes and internal controls, and get any approvals and supporting documentation when required.

If you are involved in preparing financial or business records for Vontier, comply with all applicable legal and regulatory requirements and provide true, fair, accurate and timely information.

**Don't Exceed Your Authority.** There are specific processes that define signature and spending authorities and highlight the necessary controls for running our businesses effectively. If you are not sure if you have the authority to sign a document or take action on behalf of Vontier, get approval first.

**Manage Records with Care.** Our [Records Management Policy](#) describes how to store, manage, retain and dispose of information. Use only company-supported platforms and systems to communicate about and do your work. Don't destroy documents that are subject to a legal hold. If you are asked to alter documents, discuss the request with your manager or other leader, and ensure that the request is only to correct an existing error.



## Our "Records" include:

- *Travel or expense reports*
- *Timecards*
- *Safety reports*
- *Production or quality records*
- *Financial statements*
- *Sales reports*
- *Payroll documents*
- *Contracts or purchase orders*
- *Gift receipts*
- *Shipping documents*





# Financial & Business Records

## Cooperate with Audits and Investigations.

Never pressure, manipulate or mislead internal or external accountants, auditors or investigators who are authorized to review Vontier's books and records.

**Be Alert. Speak Up!** if you see or suspect:

- Omissions
- False, inaccurate, incomplete or misleading entries
- Unrecorded ("off the books" or "slush") funds or assets
- Sales or expenses shifted between time periods to improve or obscure results
- Alteration of documents



## What Would You Do?

*Your manager directs you to change information on an invoice, but she doesn't provide any of the documentation required to support the change. What should you do?*

## What Should You Do?

You are required to be honest and accurate and to record entries in a way that fully and accurately reflects the transaction. If you are comfortable, ask your manager for the supporting documentation and the rationale needed to make the change. You can also raise the concern to your OpCo or Vontier HR, Legal & Compliance, Internal Audit, Finance team or **Speak Up!** It's important that we get this right.



## Learn More

**[Records Management Policy](#)**





# Insider Trading

**Our Commitment.** As employees of Vontier, we may know of material, nonpublic information (“inside information”) about our company or other companies we work with, but we never use or share that information to gain an unfair advantage.

**Everyday Actions.** We don’t trade (buy or sell securities)—or tip others so they may trade—based on inside information.

**Know What to Protect.** Inside information is any information about Vontier or our customers or business partners that is not publicly available, but if known, might influence an investor to buy or sell stock. Using this kind of information to trade is called insider trading, and it’s illegal. Be sure you know the kind of information considered to be inside information and protect it in the same way that you would protect any [Confidential Information](#).

**Take Extra Precautions.** Some people at Vontier and certain types of stock transactions are subject to blackout periods and additional trading restrictions—know the rules before you trade.

**Don’t Trade, Don’t Tip:** If you possess inside information about a company (ours or anyone else’s):

- Don’t buy or sell stock based on the information
- Don’t tip others so they can buy or sell stock based on that information
- Don’t share the information with co-workers unless there’s a legitimate business need to do so
- Don’t share the information with family, friends or others outside of Vontier
- Ask before trading stock any time you’re not sure if information is considered inside information



## Inside information includes nonpublic information about:

- *Financial earnings or losses*
- *Financial forecasts*
- *New product offerings*
- *Strategic business plans*
- *Potential mergers, sales or acquisitions*
- *Changes in executive leadership*
- *Major litigation or pending lawsuits*
- *Government investigations and inquiries*





# Insider Trading



## What Would You Do?

*You were in a meeting with the leadership team and someone mentioned a possible new acquisition. You told your partner about it over dinner, but cautioned him not to share the information with anyone else. Did you do anything wrong?*

## What Should You Do?

Yes. You must keep inside information private, even from your family and friends. If your partner trades based on this information—or shares the information with someone else and they trade—both you and your partner could be in violation of our policies and insider trading laws.



## Learn More

[Insider Trading Policy](#)

[Escalation Policy](#)





# External Communications— Media & Social Media

**Our Commitment.** We know that every spoken, written or electronic communication about Vontier has an impact on our reputation and our brand, so we ensure messaging we share is clear, accurate and consistent.

**Everyday Actions.** We refer external questions and requests for comment or information to company spokespersons who have been designated to speak on Vontier's behalf.

**Know Who to Contact.** Rely on the experts—unless you're an official company spokesperson, don't speak for Vontier. Direct inquiries to the proper resource.

## REFER QUESTIONS

## TO

From the media

Vontier  
Investor Relations team

From investors, analysts or  
shareholders

Vontier  
Investor Relations team

From the government  
(on non-routine matters)

Vontier General Counsel

About making speeches or  
participating in events

Vontier Communications team





# External Communications— Media & Social Media

**Use Social Media Responsibly.** In any online communication (including user forums, blogs, chat rooms, bulletin boards and other social media), use good judgment and follow our policies. Remember:

- Protect confidential information about Vontier and the confidential information entrusted to us by others
- Never post anything that would be discriminatory or would constitute a threat, intimidation, unlawful harassment or bullying
- Make it clear—if you comment online regarding any aspect of our business—that your views are your own and don't represent Vontier



## What Would You Do?

*You are reading an online article and discover it contains inaccurate information about Vontier. You are thinking about responding in the comment section to correct the misinformation—is that OK?*

## What Should You Do?

No. While your intentions are good, only authorized individuals may speak on behalf of Vontier. Notify your manager or Vontier Investor Relations or Communications about the article so that authorized individuals can respond as appropriate.



## Learn More

[Policy Regarding Disclosure of Information](#)

[Social Media Policy](#)

[Escalation Policy](#)







# Interacting with Governments

**Our Commitment.** We recognize that conducting business with government agencies is complex and heavily regulated.

**Everyday Actions.** We understand our obligation to know and comply with the requirements that apply to government procurement and contracting and to conduct ourselves to the highest standards.

**Be a Good Partner.** Governments around the world are large customers—transparency, accountability and openness are key to maintaining their business. Procurement and contracting requirements can vary based on country and industry. Follow all applicable rules where you operate and ensure that suppliers and third parties working on our behalf also follow them.

**Compete the Right Way.** Virtually every country has laws that prohibit bribery and corruption, and the laws of many countries have a global reach. Violations can result in lawsuits, substantial fines (for both Vontier and you) and even jail time. Do not offer or accept anything of value, either directly or indirectly (through a third party), to gain an improper advantage for yourself or for Vontier. We prohibit facilitating payments to expedite a government permit, license or action. For more information, see the [Anti-Bribery & Anti-Corruption section](#).



## In every government contract:

- Promote procurement integrity by competing fairly and ethically throughout the bidding and negotiating processes—don't attempt to obtain information or influence outcomes improperly
- Protect any government property or sensitive information that is entrusted to us
- Ensure that any quality testing, inspections or programs, as required, are properly conducted and documented
- Make sure all representations, reports, data and other statements that you submit on behalf of Vontier are accurate and truthful
- Be alert to—and [Speak Up!](#) about—fraud, waste and abuse





# Interacting with Governments



## What Would You Do?

*Work on a government contract requires you to perform a safety inspection more than once, but the instrument you test has never failed, and the requirement for multiple checks seems unnecessary. Is it OK to skip one of the inspections to save time and money?*

## What Should You Do?

No. Don't assume any requirement is unnecessary. Always adhere to the terms of the tender or contract and unless you have the documented approval of our government customer to do otherwise, don't skip any required inspections.



## Learn More

[Anti-Corruption Policy](#)

[Escalation Policy](#)







# Lobbying Activities

**Our Commitment.** As a company, we sometimes engage with elected officials on public policy issues—we always do so in full compliance with our values and our Code and disclose all related activities and expenditures as required.

**Everyday Actions.** We understand there are very specific rules related to lobbying activities and, as employees, don't participate in this type of activity without written approval from the appropriate company resource.

**Know Your Obligations.** Engaging with policymakers to seek regulatory or legislative actions may be considered lobbying, for which certain requirements must be met. If you are asked to engage in these types of activities for Vontier, first obtain the written approval of the Vontier General Counsel as well as the Investor Relations and Communications teams.

Unless you are specifically authorized, don't engage in any lobbying activities on Vontier's behalf.



## What is “Lobbying”?

*Communicating with a government official to influence laws, regulations, policies or rules—or doing research or other activities to support or prepare for communicating with a government official.*







# On-Site Visits, Inspections & Audits

**Our Commitment.** We are committed to cooperating with all reasonable requests from government or regulatory agencies.

**Everyday Actions.** We are open and transparent in our interactions and business dealings.

## Direct Requests to the Proper Resource.

If you receive an inquiry from a government official or agency, promptly contact your Legal & Compliance team for assistance.

**Cooperate Fully.** If you are questioned as part of an investigation or audit, you have a duty to cooperate and provide honest information. Make sure you have cleared any such external request in advance with the Legal & Compliance team and follow these guidelines:

- Always provide truthful, accurate and complete information
- Never impede, obstruct or improperly influence an audit or investigation
- Never lie or make false or misleading statements—verbally or in writing
- Never attempt to persuade someone else to provide false or misleading information



## What Would You Do?

*You've just learned that a government official will be visiting your facility as part of an investigation, and a co-worker suggests that you should review and clean out any old files. Is that a good idea?*

## What Should You Do?

No. If the “old files” could relate in any way to the upcoming investigation, you must not destroy them—and even if the files don't seem to be related to the investigation, talk to your Legal & Compliance team before destroying them to avoid even the appearance that they were destroyed in anticipation of the investigation. You should also ensure that the Legal & Compliance team is aware of this instruction from your colleague so that they can intervene before the bad advice is shared with others.



## Learn More

[Manual & Standard Work Regarding Unannounced Government Investigations & Raids](#)

[Escalation Policy](#)

[Regional Supplement - Investigations & Raids](#)



# Political & Charitable Activities

**Our Commitment.** We each have a right to participate in the political processes of our home countries. However, we may not represent any Vontier Company at any political event or use Vontier Company funds to make political contributions.

**Everyday Actions.** Our participation in political activities must be on our own time and at our own expense and should not interfere with our job duties. All charitable giving by Vontier Companies must be according to applicable Vontier Company policies.

**Give Your Support Responsibly.** At Vontier, we are driven to make the world a better place and often begin in our own backyards. Other than company-organized events, if you volunteer for—or donate to—particular causes or candidates, just make sure to do so on your own time and using your own resources—not Vontier's. Make sure your activities are legal, and don't solicit your co-workers to get involved in your personal political or charitable activities.

**Speak and Donate in Your Own Name.** As a company, we do not support or donate to particular political candidates or causes, so never make a donation on behalf of Vontier or your OpCo or expect to be reimbursed for any personal donations. Also remember that if you show support for your cause or candidate, do not speak or act on Vontier's behalf—make it clear that they are your views alone.

This does not prevent you from discussing your working conditions or engaging in other activities protected by law.



## What Would You Do?

*Your manager is very open about her support for a local political candidate. She tells your team about a fundraising event this weekend and invites the entire team to come. You don't want to attend, but you're afraid it will reflect badly on you. What should you do?*

## What Should You Do?

You are under no obligation to attend this event or support your manager's choice of candidate. Your manager shouldn't put her team in a situation like this and the invitation is inappropriate. Let her know that you feel uncomfortable with this invitation. If she pressures you to participate, [Speak Up!](#) and share your concerns.



## Help us help others.

Showing that we care is part of our culture. If you would like to help out in your community, Vontier and your OpCo offer a variety of opportunities to get involved through community events and charities in your area.



# Environmental Protection & Sustainability

**Our Commitment.** We understand the impact our businesses can have on our environment. We also recognize our obligation to protect it by operating cleanly and efficiently and promoting sustainable business practices.

**Everyday Actions.** We **Reimagine Better** by reducing Vontier's impact on the planet and inspiring others on our team to do the same.

**Do Your Part.** Make sure you know the proper way to use, control, transport, store and dispose of regulated material. And remember: Even non-regulated materials should be handled in a responsible, sustainable manner. If you work with our business partners, let them know that we expect them to share our commitment to environmental protection and sustainability.

**Care for and Conserve Resources.** Apply our commitment to continuous improvement to your everyday work. Help us reduce the amount of waste that Vontier generates by recycling or re-using resources, including glass bottles, cans, paper and plastic. Be aware of how you use resources like water and electricity and conserve them whenever you can. If your work involves sourcing materials or purchasing products, consider sustainability and our carbon footprint in the decision-making process.







# Environmental Protection & Sustainability

**Watch for and Report Hazards.** Stay alert in your daily work. Make sure your own actions don't harm the environment, and if you see any possible hazards, don't ignore them. Whether it involves actions by Vontier or one of our business partners, [Speak Up!](#) immediately so we can correct the situation.



## What Would You Do?

*You have noticed some co-workers handling chemicals in what you believe may be a potentially hazardous way. What should you do?*

## What Should You Do?

Ensure that your Environmental, Health and Safety (EHS) contact is aware so that any necessary follow-up action can be taken. Let your co-workers know about your concerns and remind them of any procedures they should be following to properly dispose of chemicals. When you show your concern, you are not only acting as a good role model—you are helping to make our world a better place.



## Doing Our Part

*We are committed to starting out as an independent company with a strong Environmental, Social and Governance (ESG) program. We will provide more detail about our ESG efforts in future ESG publications and disclosures.*



## Learn More

[Environmental, Health and Safety \(EHS\) Policy](#)





# Human Rights

**Our Commitment.** We are committed to promoting human rights and dignity in our world and understanding our human rights impact in every aspect of our business.

**Everyday Actions.** We consider the effect of our operations on people and communities and strive to protect them by upholding laws that protect workers, prevent child labor and ensure fair employment practices.

**Promote Human Rights.** We advance human rights by promoting fair employment practices, pay and working hours and prohibiting human rights abuses such as child labor, forced labor and human trafficking.

**Work with Like-Minded Partners.** We don't do business with any supplier or business partner who fails to promote human rights. If you are involved in the assessment or selection of our business partners, understand their reputation for operating legally and ethically.

**Monitor Our Partners' Work.** If you are responsible for managing relationships with our business partners, actively monitor their performance, stay alert for any violations of our values or our Code, and [Speak Up!](#) immediately if you become aware of misconduct.

## Ask yourself—does this partner have a history of:

- Human rights abuses?
- Violating employment laws?
- Exploiting children or using forced, trafficked or child labor?
- Disregarding employee safety?

If you answer “**yes**” or “**I'm not sure**” to any of these, this partner may not share our commitment to human rights. Consider another partner or seek help from your manager or supervisor or [Speak Up!](#) if you have questions.





# Human Rights



## What Would You Do?

*You read a news story about a supplier we currently use who was accused of having unsafe working conditions a few years ago. Should you take any action based on this?*

## What Should You Do?

Yes. [Speak Up!](#) about your concerns immediately. We won't buy materials or goods produced by a supplier that has a record of human rights violations. Share the information with your manager or supervisor so we can investigate, understand the partner's current practices, and take proper action if warranted.



## Learn More

[Policy on Combating Trafficking in Persons](#)

[Transparency in Supply Chains Statement](#)







# Our Shared Commitment

**We conduct business with integrity.** When we do the right things the right way, acting in accordance with our Code and values, we earn the trust and respect of each other, our customers, our business partners and our shareholders.

Always remember that if you face a difficult situation, you are not facing it alone. Reach out to your manager, HR, Legal & Compliance, Internal Audit or [Speak Up!](#) for answers and support.

Living our Code every day is a critical part of achieving our purpose: **mobilizing the future to create a better world.** Thank you for your commitment to our Code and for all you do to build our strong future together.

