

## ANTI-CORRUPTION POLICY

Vontier Corporation is committed to the highest level of integrity and obeying the laws in all countries where Vontier does business. The purpose of this Policy is to provide clear guidance for compliance with all applicable anti-bribery and anti-corruption laws and to encourage and provide guidance for reporting of any suspected violations.

### Scope

This Policy applies to all employees at every level of Vontier and its businesses globally, including any subsidiary or joint venture in which Vontier has a majority interest or otherwise controls.

This Policy supplements and must be read in conjunction with any other applicable Vontier policies, such as the Vontier Code of Conduct, Gift & Entertainment Policy, Political Involvement Policy, Charitable Contributions Policy, Customer Travel Expense Policy.

This Policy applies equally to all third party representatives of Vontier. No improper payments shall be made, offered, authorized, or reimbursed - whether directly or indirectly - by any third party acting as an agent, representative, independent contractor, or on behalf of Vontier.

### Bribery & Corruption Defined

Anti-corruption laws are generally broad in scope and application. They make it illegal for anyone to offer, promise, give, solicit or receive - directly or indirectly - anything of value (financial or otherwise) to or from a government official or any other person, to improperly influence that person in the performance of a duty or to obtain or retain business or any undue business advantage.

These laws often apply even to small or immaterial payments of cash or other things of value.

Under this Policy the term **anything of value** includes the following (note that these are just examples; this is not intended to be a complete list):

Cash payments (or cash equivalent, e.g., gift cards - never allowed), goods, services, favors, benefits, tickets to entertainment, membership in social organizations, conference fees, honoraria, loans, charitable contributions, special discounts, hotel rooms, transportation, job offers, political contributions, gifts (no matter how small), interests in business, and any and all other things that have value to the recipient or that have value to people the recipient cares about (like family, friends and business associates).

All employees and third parties are prohibited from engaging in any acts of bribery or corruption, either directly or through a third party.

**Facilitation payments** are a type of bribe. They are usually defined as payments made to expedite or facilitate the performance of a public official for a non-discretionary, routine government action.

**Kickbacks** are the seller's return of part of an item's purchase price to a buyer's representative to induce a purchase or improperly influence future purchases.

Facilitation payments and kickbacks, whether legal or not in a country, are prohibited under this Policy.

### Government Officials

Many countries' laws treat interactions with government officials differently. Accordingly, we must exercise particular caution when interacting with government officials and their close family members.

Vontier prohibits improper payments in all circumstances, whether in dealing with government officials or individuals in the private sector.

A **Government Official** may include anyone, regardless of rank or title, who is:

- An officer or employee of any local, provincial, or national government, including government agencies.
- Any person acting in an official capacity or on behalf of a government or any government department or agency.
- A director, officer, representative, agent, or employee of any government-owned or controlled business or company (remember that in many countries many of our customers fit this description, e.g., government owned oil companies).
- An officer or employee of a public international organization such as the World Bank or the United Nations.
- Any official of a political party or any candidate for political office.
- A close relative (e.g., parent, sibling, spouse, or child) of any of the above.

### Gift, Hospitality, Travel and Entertainment

Gift, hospitality, travel, and entertainment may not be used to influence any person or to obtain or retain an improper business advantage for Vontier. Employees should never give or accept a business courtesy that will compromise the employee's judgment, inappropriately influence others, or reflect negatively on Vontier.

Vontier employees may only give or accept business courtesies in strict compliance with Vontier's Gift & Entertainment Policy and Customer Travel Expense Policy.

### Limited Exception

**Imminent Threats.** If there is an imminent threat to an employee's health or safety, such as a threat of physical violence, you may provide a payment to avoid immediate harm. Loss of business is not an imminent threat. Whenever possible, you first must consult the Vontier Integrity & Compliance department to obtain authorization before making the payment. If prior approval is not possible, you must report the payment within 48 hours of its occurrence to the Integrity & Compliance department.

### **Accurate Books and Records & Internal Controls**

The U.S. Foreign Corrupt Practices Act (FCPA) and other laws impose accounting and record-keeping requirements intended to ensure that companies maintain accurate books and records, as well as appropriate internal controls. Accordingly, all payments made by Vontier or made by any person and reimbursed by Vontier must be accurately recorded in Vontier's corporate books, records, and accounts in a timely and detailed manner. False, misleading, incomplete, inaccurate or artificial entries in the books and records of any Vontier business are strictly prohibited. It is never allowed to mischaracterize an improper payment as a proper one, or to bury an improper payment in a larger line-item of proper payments. In addition, each Vontier reporting entity is required to maintain an internal control environment designed to prevent improper payments.

### **Third Party Representatives' Due Diligence**

Before entering into a business relationship with a third party to perform work that (i) will or may involve transacting business with a government official, or (ii) that will or may involve selling Vontier businesses products or services to others, Vontier and Vontier businesses must conduct due diligence and obtain proper approval before commencing the relationship with the third party. They must follow the due diligence and other procedures in the Vontier Channel Partner Toolkit in order to comply with this Policy with respect to such third parties.

### **Mergers, Acquisitions, and Joint Venture**

Any agreement by a Vontier subsidiary to merge, acquire, or enter a joint venture with a non-Vontier entity requires advance approval from Vontier Legal. In situations where Vontier or a subsidiary will merge with, acquire a majority stake or operational control, or acquire all or substantially all the assets of a non-Vontier entity, Vontier must properly guard against legal, financial, and reputational risks related to potential corruption issues arising from those transactions.

### **Training and Communications**

Training on anti-bribery, anti-corruption, and this Policy is provided through the Code of Conduct training, which is required annually for all employees.

Additional targeted training and communications will be delivered to specific functions or roles on an as-needed basis.

### **Anti-Corruption Audit Responsibilities**

Vontier, through the Integrity & Compliance department or other Vontier functions, will conduct risk assessments and audits of Vontier subsidiaries focused on anti-corruption compliance. Based on the risk assessment results, Vontier will identify certain subsidiary locations to audit. Those locations shall cooperate with and provide full and complete information in connection with the audits.

### **Compliance and Enforcement**

Failure to comply with this Policy could result in disciplinary actions up to and including termination of employment. In addition, individuals violating anti-bribery laws may be fined and imprisoned as the result of criminal prosecution.

Employees must report any conduct that they believe in good faith to be in violation or apparent violation of this Policy to an immediate supervisor or manager, People & Culture, the Integrity & Compliance department or the [Vontier Speak Up! Helpline](#).

Any such reports will be managed in accordance with the Vontier Speak Up! Policy and will be treated as confidential to the extent permitted by law and consistent with investigatory needs. Vontier prohibits retaliation for good faith reports of suspected misconduct.

### Oversight

Vontier's Chief Compliance Officer endorses and owns this Policy. For further information, please contact [compliance@vontier.com](mailto:compliance@vontier.com). Any exceptions must be approved by the Policy owner in writing.

### Policy History

Date of Change	Responsible Party	Summary of Change
September 2020	Vontier CCO	Initial Creation
April 2022	Sylvie Sauteur Costa	Revision
September 2025	Sylvie Sauteur Costa	Revision
September 2025	Policy on Policies Council	Approval