



VONTIER GIFT & ENTERTAINMENT POLICY

I. OBJECTIVE

Vontier recognizes that gifts and entertainment build goodwill between the Company and our business partners. The objective of this Gift & Entertainment Policy is to set forth the requirements and limits our employees must observe when giving or receiving gifts, as well as participating in business partner-related entertainment events.

II. SCOPE

This Policy applies to all Vontier and its Operating Companies (“OpCos”) employees globally, including any subsidiary or joint venture in which Vontier has a majority interest or otherwise controls (hereafter individually or collectively, “Vontier”). This Policy functions as a supplement to Vontier’s Code of Conduct and Vontier’s Anti-Corruption Policy and provides more specific guidance concerning the gifts and entertainment that are permissible for current or potential customers, suppliers and other business partners in compliance with the Code of Conduct and Anti-Corruption Policy.

This Policy does not cover travel, lodging and meal expenses for trips Vontier provides to customers, suppliers or other third parties. Refer to the Vontier Customer Travel Expense Policy for the rules that apply to these business trip-related expenses.

In some instances, local law may be more restrictive than this Policy, in which case employees are required to comply with local law.

If your OpCo has implemented a more restrictive policy, you must comply with your OpCo policy.

III. WHAT IS A GIFT?

The term “gift” is used broadly in this Policy. Gift includes anything of value you provide to or receive from a potential or current customer, supplier or business partner, or people the customer, supplier or business partner cares about (like family, friends and business associates).

Examples of gifts covered by this Policy are logo items, holiday items, tea, food baskets, tickets to sporting events, flowers and bottles of wine or other alcoholic beverages. But these are only typical examples – anything of value, such as memberships in social organizations, conference fees, honoraria, loans, special discounts, job opportunities and other valuable items, services and favors also qualify as gifts and must comply with this Policy and all applicable laws.

The term “gift” does not include anything required by law or a legitimate business contract. It also does not include a travel expense approved according to the Vontier Customer Travel Expense Policy.

IV. GIFT & ENTERTAINMENT LIMITATIONS

A. Limits Relating to the Purpose and Intent for Gifts

Gifts or entertainment may be appropriate as a business courtesy and to build relationships. Vontier, however, competes for customers solely on the commercial merit of Vontier's product offerings (features, quality, price, service, etc.) and selects suppliers and other business partners solely on the partners' ability to meet Vontier's business needs.

Vontier does not permit the exchange of gifts for the purpose or intent of obtaining or retaining business (e.g., entering into a contract) or any other improper business advantage. As a Vontier employee, you must never directly or indirectly give gifts or entertainment to a customer in return for the purchase of products or services from Vontier (or to obtain particular sales terms), and you must never accept gifts or entertainment directly or indirectly from a supplier in return for purchasing products or services (or to agree to particular purchase terms). Each Vontier employee is responsible for ensuring that any gift or entertainment that they give or receive complies with this Policy and all applicable laws.

B. Limits on the Value of Gifts

There are two charts (Table 1 and Table 2) in this Policy that provide maximum value limits for allowed gifts. Table 1 is for gifts to Government Recipients (i.e., individuals representing a governmental entity) and Table 2 is for gifts to Non-Government Recipients. Before you reference these two charts, you must read and understand this Gift & Entertainment Policy.

C. Limits for Gifts to Government Recipients v. Non-Government Recipients

Because of special laws and concerns about giving Gifts or Entertainment to government workers or companies owned or controlled by a government, this Policy sets out specific and more restrictive requirements for individuals who work for or represent governments or government-owned companies ("Government Recipients") (see Table 1). If you are not sure if a person is a Government Recipient or a Non-Government Recipient, you must treat that person as a Government Recipient for purposes of this Gift & Entertainment Policy.

D. Additional Limits that Apply to Gift Giving

In addition to the gift value limits in Tables 1 & 2, all gifts must:

- 1) Comply with all applicable local laws and internal policies of the recipient's organization;
- 2) Not be motivated by a desire to obtain or retain business or obtain any improper business advantage;
- 3) Be reasonable and customary in the place where given and under the circumstances;
- 4) Not be lavish, lewd or extravagant;
- 5) Not be provided with such frequency or in such amount as to create an appearance of impropriety;

- 6) Not consist of cash or cash equivalents (e.g., gift cards).

E. Additional Limits that Apply to Accepting Gifts

In addition to the gift value limits in Table 2, all gifts may only be accepted if the gifts:

- 1) Are not cash or cash equivalents;
- 2) Are not requested by you;
- 3) Will not affect your independent business judgment on behalf Vontier; and
- 4) Will not give the appearance of impropriety.

V. WHEN IS ENTERTAINMENT SUBJECT TO GIFT LIMITS?

Entertainment is subject to the gift value limits when the entertainment is provided without a Vontier employee present and engaging in business relationship building. For example, providing a ticket to a sporting event to a customer, supplier or business partner is subject to the gift value limits if no Vontier employee will attend the event along with the partner. On the other hand, a typical business lunch or business dinner where a Vontier employee joins a customer, supplier or business partner for the meal and then pays for the meal is not subject to the gift value limits. The same principle applies to Vontier employees accepting entertainment provided by a current or potential customer, supplier or business partner. If it is an activity shared with the partner, the value limits in the charts do not apply. The value limits apply, however, if the entertainment is to be enjoyed without the customer, supplier or business partner.

Even if a business entertainment event is not subject to the gift value limits, the event is prohibited: (i) if it is intended to cause a current or potential customer to buy a Vontier product, or a Vontier employee to select a particular supplier, on any basis other than the commercial merits of the Vontier product or supplier offering; (ii) if it is provided with such frequency or in such total amount that it may give the appearance of impropriety, even if each individual event is of relatively low value; or (iii) if it is prohibited by any applicable law .

A good practice is to not provide or accept any entertainment with a customer, supplier or business partner that is valued at more than twice the maximum per-gift amounts set forth in the tables.

VI. EXCEPTION PROCESS

All Vontier and OpCo employees must comply with this Policy. If you want to do something that is not permitted by this Policy, you must follow the exception process before proceeding. If your request for an exception is denied, you must not proceed.

You may NOT use personal funds or induce any person to use any other funds to provide anything that is not allowed by this Policy or which is denied in the exception process.

- a) Special gifts exceeding the limits in Table 1 may be given to or received from **Government Recipients** if special circumstances require, provided that the gifts are otherwise in



compliance with this Policy and all applicable laws, and **Vontier's Chief Compliance Officer** and the **Operating Company's CFO** each approve any such gift in advance.

- b) Special gifts exceeding the limits in Table 2 may be given to or received from **Non-Government Recipients** if special circumstances require, provided that the gifts are otherwise in compliance with this Policy and all applicable laws and the **Vontier Regional Compliance Director/Counsel** and the **Operating Company CFO (or the regional Finance Controller or subsidiary CFO designated by the OpCo CFO)** approve any such gift in advance.
- c) **Cash gifts** and cash equivalent gifts (gift cards, etc.) are never acceptable outside **Japan and Korea**. We understand that it is traditional in certain situations in Japan and Korea to provide small cash gifts for certain life events. This practice, if otherwise in compliance with this Policy and all applicable laws, is allowed in Japan and Korea for Non-Government Recipients only if an Operating Company's President adopts a specific policy allowing such gifts. Any such policy must: (i) list the specific life events for which cash gifts are allowed, (ii) establish maximum amounts for cash gifts for each life event not to exceed 10,000 Yen/100,000 Won and (iii) provide that cash gifts over the limits set in the policy may only be made with approval of the parent Operating Company CFO (not the country/regional Controller or the local country subsidiary CFO). Life events selected for cash gifts must be limited to those where a non-cash gift would be viewed as discourteous in the circumstances.
- d) All exception process approvals must be in writing (email is acceptable).

VII. ACCURATE RECORDS

Expenses associated with providing any gift must be accurately recorded by the OpCo in its books and records and in any roll-up to Vontier – NO EXCEPTIONS.

VIII. OTHER CURRENCIES

The two charts at the end of this policy provide maximum gift amounts allowed in U.S., Chinese and EU currencies. If you are giving or receiving a gift in a jurisdiction with a different national currency, you must consider relative costs of living and adjust (downward only) the maximum amounts found in the two tables proportionately. In every case, the maximum amount allowed is zero if the purpose of the gift is to influence a current or potential customer's buying decision or Vontier's choice of a supplier or otherwise obtain an improper business advantage.

IX. REPORTING AND NON-RETALIATION

Directors, officers and employees must report any conduct that they believe in good faith to be a violation or apparent violation of this Policy to supervisors, higher management, Vontier Legal, Integrity & Compliance Group or the [Vontier Speak Up! Helpline](#).

Any such reports shall be treated as confidential to the extent allowed by law and consistent with investigatory needs. Vontier prohibits retaliation for good faith reports of suspected misconduct.



Any questions concerning this policy or how to handle a specific situation may be addressed to your Vontier Regional Compliance Director/Counsel, the Vontier Chief Compliance Officer or the Vontier Integrity & Compliance Group via compliance@vontier.com.

Maximum Gift Values

Table 1: Government Recipients (see full list of persons deemed Government Recipients below)

- ONLY WHERE ALLOWED BY LAW AND GOVERNMENT POLICIES
- IN MANY COUNTRIES, IT IS ILLEGAL TO GIVE GIFTS OF ANY VALUE TO GOVERNMENT EMPLOYEES - EVEN MEALS MAY BE ILLEGAL
- NEVER GIVE CASH or CASH EQUIVALENTS – NO EXCEPTIONS
- The limit is ZERO if the intent is to influence business outcomes.

Maximum Value of Any Gift to an Employee or Representative of a Government Recipient

US\$75 - RMB480 - €70

Note: Do not automatically spend the maximum; consider the position of the recipient and spend at a level that avoids any appearance of attempting to buy influence. Consider:

- Will it stand up to independent scrutiny?
- Is it in the interest of your Vontier OpCo?
- Could it be perceived as dishonest or corrupt?

Maximum Total Value of All Gifts to the same employee or representative of a Government Recipient in a Calendar Year

US\$150 - RMB960 - €140

Any person who fits one or more of the following descriptions is a “**Government Recipient**” under this Policy:

- Anyone who works for any government or for any government agency or department;
- Any person acting in an official capacity on behalf of a government or any government department or agency;
- Any person who works for any company that is owned or controlled by any government or government department or agency (remember that in many countries many of our customers fit this description, e.g., government owned oil companies);
Associates must inform themselves about the ownership of each company whose employees they may wish to provide with something of value under this policy. If ownership cannot be ascertained, you MUST treat the company as a government-owned company.
- Any 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.

<p>Maximum Gift Values</p> <p>Table 2: Non-Government Recipients</p> <ul style="list-style-type: none"> • ONLY WHERE ALLOWED BY LAW • NEVER GIVE CASH or CASH EQUIVALENTS* • The limit is ZERO if the intent is to influence business outcomes. 	
<p>Maximum Value of Any Gift to an Employee or Representative of a Non-Government Recipient</p>	<p>US\$125 - RMB795 - €115</p> <p>Note: Do not automatically spend the maximum; consider the position of the recipient and spend at a level that avoids any appearance of attempting to buy influence. Consider:</p> <ul style="list-style-type: none"> • Will it stand up to independent scrutiny? • Is it in the interest of your Vontier OpCo? • Could it be perceived as dishonest or corrupt?
<p>Maximum Total Value of All Gifts to the same employee or representative of a Non-Government Recipient in a Calendar Year</p>	<p>US\$250 - RMB1,590 - €230</p>
<p>* If your OpCo has issued a written policy for Japan and/or Korea that complies with Section VI. (c) of this Gift & Entertainment Policy, then you can give cash gifts that comply with your OpCo Policy.</p>	