



## VONTIER CORPORATION GIFT & ENTERTAINMENT POLICY

**ATTENTION:** This policy does not allow gifts or entertainment to be provided or accepted if the gift or entertainment would violate any applicable law. For all of our businesses, you must comply with whichever rule is stricter – this policy or applicable law. If you have any questions about whether a particular gift or entertainment would violate applicable law, please consult Vontier’s compliance and/or legal department before proceeding.

### I. INTRODUCTION

Vontier companies compete for customers solely on the commercial merits of Vontier company product offerings (features, quality, price, service, etc.). Vontier companies select suppliers solely on the commercial merits of supplier product offerings (features, quality, price, service, etc.). As a Vontier company associate, you must not give gifts or entertainment to anyone in return for a customer’s purchase of products or services from a Vontier company, and you must not accept gifts or entertainment from anyone in return for selecting a particular supplier to provide goods or services to a Vontier company. These fundamental rules apply at all times in all situations. These rules do not prohibit all gifts or all entertainment. Gifts and entertainment that comply with this Gift and Entertainment Policy and all applicable laws are allowed. Each Vontier company associate is responsible for ensuring that any gift or entertainment that they give or receive complies with this Gift and Entertainment Policy and all applicable laws.

Vontier companies serve global markets. Different regions and countries have different cultural practices and traditions with respect to gift giving, as well as different applicable laws. In some countries, such as the United States, gifts are typically exchanged by personal friends, not by business acquaintances. In other countries, it is customary for businesspeople to offer gifts to customers, suppliers and other business partners on certain holidays or personal occasions to show courtesy, loyalty and respect. We must, however, be very careful in giving these gifts of courtesy not to break the laws of the countries in which the gifts are given or the laws of other countries like the United States and the United Kingdom that may apply to our actions globally. To be clear, genuine cultural traditions of showing courtesy, loyalty and respect are different from the illegal acts of paying or receiving bribes, kickbacks or other improper payments in exchange for business. Expressions of courtesy required by local custom and in compliance with all applicable laws and this Gift and Entertainment Policy are allowed, but paying or accepting bribes, kickbacks or other improper payments is not allowed.

Because there are special laws and concerns about giving gifts or entertainment to people who work for the government or for companies that are owned by the government, this Gift and Entertainment Policy has different requirements for individuals who work for or represent governments or government-owned companies (“Government Recipients”) and for employees or representatives of non-government companies (“Non-Government Recipients”). 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 and Entertainment Policy.

At the end of this Gift and Entertainment Policy, there are two tables that provide maximum value limits for allowed gifts. One table is for gifts to Government Recipients and one table is for gifts to Non-Government Recipients. Before you use these two tables, you must read this entire Gift and Entertainment Policy and understand all of its requirements, including the requirement that any gift or entertainment given or received comply with all applicable laws. The tables by



themselves do not provide all of the information you need to comply with this Gift and Entertainment Policy.

#### NOTES:

- A) This Gift and Entertainment Policy does not cover travel, lodging and meal expenses for trips provided by Vontier companies to customers, suppliers or other third parties (consult Vontier's Customer Trips and Entertainment Policy for the rules that apply to trip expenses).
- B) This Gift and Entertainment Policy is a supplement to Vontier's Standards of Conduct and Vontier's Anti-Corruption Policy and provides more specific guidance on what gifts and entertainment can be provided to current or potential customers, suppliers and other business partners in compliance with Vontier's Standards of Conduct and Vontier's Anti-Corruption Policy.

## II. WHAT IS A GIFT?

"Gift" is a very broad category. As used in this Gift and Entertainment Policy, gift covers anything of value you chose to provide to a current or potential business partner or people the business partner cares about (like family, friends and business associates), that is not required by law or a legitimate business contract and that is not a trip expense approved according to the Vontier Customer Trips and Entertainment Policy. Examples of gifts covered by this Gift and Entertainment 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 cash, gift cards, memberships in social organizations, conference fees, honoraria, loans, special discounts, and other valuable items, services and favors are also covered and may not be provided if they do not comply with this Gift and Entertainment Policy and all applicable laws. "Gift" also covers all of the same things when received by a Vontier company associate.

## III. WHEN IS ENTERTAINMENT SUBJECT TO THE GIFT VALUE LIMITS?

Entertainment is subject to the gift value limits in the two tables at the end of this Gift and Entertainment Policy when the entertainment is provided without a Vontier company associate present and engaging in business relationship building. For example, providing a ticket to a sporting event to a business partner is subject to the gift value limits if no Vontier company associate will attend the event with the business partner. On the other hand, a typical business lunch or business dinner where a Vontier company associate joins a business partner for the meal and then pays for the meal is not subject to the specific value limits in the tables. The same principle applies to Vontier company associate's accepting entertainment provided by a current or potential business partner—if it is an activity shared with the partner, the value limits in the tables do not apply, but if it is something to be enjoyed without the business partner, the value limits in the tables do apply.

Even if a business entertainment event is not subject to the gift value limits, the rest of this Gift and Entertainment Policy still applies: (i) if the business entertainment is intended to cause a current or potential customer to buy a Vontier product, or a Vontier associate to select a particular supplier, on any basis other than the commercial merits of the Vontier product or supplier offering, then the business entertainment is prohibited, regardless of its value; (ii) if the business



entertainment is provided with such frequency or in such total amount that it may give the appearance of impropriety, then it is prohibited, even if each individual event is of relatively low value; and (iii) if any applicable law prohibits the gift or entertainment, then it is not allowed.

A good rule to follow is not to give or accept any entertainment with a business partner that is valued at more than twice the maximum per-gift amounts set forth in the tables.

## IV. WHO IS A GOVERNMENT RECIPIENT?

Any person who fits any of the following descriptions is a “Government Recipient” under this Gift and Entertainment Policy:

- a. Any officer or employee of any government-owned or government-controlled company (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);
- b. Any officer or employee of any national, regional or local government, including any department, agency or other government entity (this includes all government officials at all levels of government in any country and any government person from other countries visiting that country);
- c. Any officer or employee of a public international organization;
- d. Any advisor or consultant to any government;
- e. Any political party official or candidate for political office;
- f. Anyone acting in an official capacity for any of the above described persons or organizations;
- g. Any person designated by, or a family member of, anyone who fits into any of the above categories (“family member” includes the person’s spouse and the person’s and the person’s spouse’s grandparents, parents, siblings, children, nieces, nephews, aunts, uncles and first cousins, the spouse of any of these people, and any other individual who shares the same household with the person).

## V. REQUIREMENTS THAT APPLY EVERY TIME – GIVING GIFTS

- a. In considering whether to give a gift to any Government Recipient or any Non-Government Recipient, associates shall always exercise moderation and good judgment.
- b. You may give gifts up to the maximum values shown in the tables ONLY IF your action:
  - 1) Complies with all applicable local laws and regulations and all internal policies of the recipient’s organization;
  - 2) Is NOT motivated by a desire to exert improper influence, obtain any improper business advantage or compensate the recipient for something;



- 3) Is reasonable and customary in the place where given and under the circumstances and is not lavish, lewd or extravagant;
- 4) Is tasteful and commensurate with generally accepted standards for professional courtesy; and
- 5) Is not provided with such frequency or in such amount as to create an appearance of impropriety.

## VI. REQUIREMENTS THAT APPLY EVERY TIME – ACCEPTING GIFTS

You may accept gifts up to the maximum values show in the tables ONLY IF the gifts are not cash or cash equivalents, are not requested by you, will not affect your independent business judgment on behalf of your Vontier company and will not give the appearance of impropriety. If your OpCo has a policy that prohibits accepting gifts, or sets lower maximum values, you must obey your OpCo policy.

## VII. EXCEPTION PROCESS

If you want to do something that is not permitted by this Gift and Entertainment Policy, you must seek an exception using the following 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 Gift and Entertainment Policy or which is denied in the exception process.

- a. Special gifts exceeding the values indicated in Table 1 (Government Recipients) may be given to or received from Government Recipients if extraordinary circumstances require, provided that they are otherwise in compliance with this Gift and Entertainment Policy and all applicable laws and Vontier's General Counsel (or his designee), the parent Operating Company President, and the parent Operating Company CFO each approve any such gift in advance of such gift being given or accepted.
- b. Special gifts exceeding the values indicated in Table 2 (Non-Government Recipients) may be given to or received from Non-Government Recipients if extraordinary circumstances require, provided that they are otherwise in compliance with this Gift and Entertainment Policy and all applicable laws and the parent Operating Company CFO (not the country/regional Controller or the local country subsidiary CFO) approves any such gift in advance of such gift being given or accepted.
- c. Cash gifts and cash equivalent gifts (gift cards, etc.) are never acceptable for Government Recipients. 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 Gift and Entertainment Policy and all applicable laws, is allowed in Japan and Korea for Non-Government Recipients only if an Operating Company's President (not the country General Manger or the local country subsidiary 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 (e-mail is acceptable).

## VIII. ACCURATE RECORDS

Expenses associated with providing any gift to any Government Recipient or any Non-Government Recipient must be accurately recorded by the operating company in its books and records and in any roll-up to Vontier – NO EXCEPTIONS.

## IX. OTHER CURRENCIES

The two tables at the end of this policy provide maximum gift amounts in US, 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 the Vontier company's choice of a supplier.

## X. FURTHER INFORMATION

If you have any questions about this policy, please contact Kelly Clement, Vontier's VP, Associate General Counsel & Chief Compliance Officer ([kelly.clement@vontier.com](mailto:kelly.clement@vontier.com)).

Maximum Gift Values

Table 1: Government Recipients

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.

<p>Maximum Value of Any Gift to a Government Recipient</p>	<p>US\$35 – RMB260 - €30</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"> <li>• Will it stand up to independent scrutiny?</li> <li>• Is it in the interest of your Vontier company?</li> </ul> <p>Could it be perceived as dishonest or corrupt?</p>
<p>Maximum Total Value of All Gifts to the same Government Recipient in a Calendar Year</p>	<ul style="list-style-type: none"> <li>• US\$100 – RMB750 - €90</li> </ul>
<p>Maximum Total Value of All Gifts to all Government Recipients in the Same Government Agency in a Calendar Year</p>	<p>Set in discussion with OpCo President considering appearance of impropriety</p>

Maximum Gift Values

Table 2: Non-Government Recipients

ONLY WHERE ALLOWED BY LAW

NEVER GIVE CASH or CASH EQUIVALENTS\*

The limit is ZERO if the intent is to influence business outcomes.

Maximum Value of Any Gift to a Non-Government Recipient

USD\$75 – RMB500 - €60

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 company?
- Could it be perceived as dishonest or corrupt?

Maximum Total Value of All Gifts to the same Non-Government Recipient in a Calendar Year

USD\$225 - RMB1500 - €180

Maximum Total Value of All Gifts to all Non-Government Recipients in the Same Private Company in a Calendar Year

Set in discussion with OpCo President considering appearance of impropriety

\*If your OpCo has issued a written policy for Japan and/or Korea that complies with Section 7(c) of this Gift and Entertainment Policy, then you can give cash gifts in Japan and/or Korea that comply with your OpCo policy.