



1. Global Trade Compliance Policy

1. Overview

The United States, and most countries, have laws to control the import, export, and reexport of certain goods and technologies. The principal regulations governing international trade are the US Customs and Border Protection (CBP) regulations, International Traffic in Arms Regulations (ITAR), Export Administration Regulations (EAR), anti-boycott regulations, Office of Foreign Assets Controls (OFAC) regulations, and similar laws around the world. Violations of trade laws may result in damage to a company's reputation, loss of import and export privileges and criminal and civil penalties.

2. Purpose

Vontier Corporation ("Vontier") and its operating companies ("OPCOs") are committed to conducting its business in compliance with all applicable trade laws. The purpose of this policy is to ensure that Vontier and its OPCOs comply with all applicable trade compliance laws and regulations in all countries in which we do business with. Compliance with all applicable trade laws is critical to our Company's success.

3. Scope

This document applies to Vontier, its OPCOs, business segments, and subsidiaries around the world. Unless indicated otherwise, references to Vontier and/or OPCOs include all business units, their employees, and contractors.

4. Policy

4.1 Organization

Vontier's Corporate Compliance organization is responsible for drafting all Global Trade Compliance policies and will work with all OPCOs to ensure policies are adopted timely and effectively. Every OPCO will assign a Trade Compliance Representative to partner with the Global Trade Compliance Counsel in ensuring compliance to all relevant trade regulations. Collectively, the OPCO Trade Compliance Representatives create Vontier's Trade Compliance Network. The Trade Compliance Network assists Vontier in complying with all relevant trade laws through the participation in trainings and frequent meetings known as Trade Compliance Council meetings, development of OPCO trade compliance procedures, and through the handling of trade compliance requests.

4.2 Imports

An import is a good brought into one country from another. Imports may be temporary or permanent. All Vontier employees must comply with applicable import laws and regulations which include the marking and labeling of goods, valuation of goods, payment of duties and participation in free trade agreements, proper reporting, and recordkeeping.



4.3 Exports

An export is when a good is sent from one country to another. Examples of exports include the physical movement of an item by truck, plane, or hand carry, the sending of technology electronically, such as through email, fax, or posting on the internet. Exports may also occur entirely in the US because the release of technology to a foreign national in the US is a “deemed export.” All Vontier employees must comply with applicable export laws and regulations which include ensuring a product or technology is assigned the proper classification and authorization prior to any export and only exporting to those persons and countries in which we are authorized to do business with.

4.4 Boycotts

A boycott is a refusal to engage in business with another party. Vontier complies with all US anti-boycott laws and does not participate in anti-boycott requests (*e.g.*, the Arab League boycott of Israel). All anti-boycott requests must be reported to Vontier’s Global Trade Compliance Counsel.

4.5 Sanctions and Embargoes

Vontier complies with all applicable laws and regulations regarding economic sanctions in the form of embargoes or other restrictions on transactions with certain countries, groups, and individuals. Vontier complies with these regulations using third-party screening tools. Vontier does not do business with North Korea, Cuba, Iran, Syria, or the Crimea Region of Ukraine.

4.6 External Communications with Regulatory Authorities

All requests and communications from regulatory authorities must be coordinated with Vontier’s Global Trade Compliance Counsel and responded to in a timely manner.

4.7 Mergers, Acquisitions, and Divestitures

Vontier’s Global Trade Compliance Counsel will participate in any pre- and post-closing due diligence for all mergers, acquisitions, and divestitures as required. After a merger or acquisition is complete, the new business must assign a trade compliance representative within 60 days.

5. Policy Compliance

5.1 Reporting potential non-compliance and violations

All Vontier employees are responsible for reporting potential or suspected violations of trade laws to their OPCO Trade Compliance Representative, manager, a member of the legal department, or Vontier’s Senior Trade Compliance Counsel or through an identified compliance reporting hotline such as Speak up! Each OPCO is responsible for establishing effective procedures (*e.g.*, dedicated contact persons, hotlines, designated email addresses, etc.) for ensuring appropriate internal notification of such matters. If any area of non-compliance with



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trade laws is discovered, the OPCO Trade Compliance representative must inform Vontier’s Senior Trade Compliance Counsel who will determine appropriate follow-up actions.

5.2 Compliance Measurement and Audits

The Vontier Trade Compliance Team and/or Internal Audit Team may verify compliance to this policy through various methods, including but not limited to, business tool reports, internal and external audits, and feedback to the policy owner.

5.3 Exceptions

Any exception to the policy must be approved by Vontier’s Senior Trade Compliance Counsel in advance.

6. Revision History

Date of Change	Responsible	Summary of Change
January 2022	Jessica Butcaris	Initial creation