# TRUST TEAM EXCELLENCE

**Code of Business Conduct and Ethics** 



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NO MATTER WHAT PART OF THE WORLD **OR BUSINESS UNIT** YOU SIT IN, OUR **VALUES ARE A POWERFUL FORCE** THAT UNITE US AS UNIQUELY IDEX.

- ANDY SILVERNAIL





#### COLLEAGUES

I am pleased to announce the refresh of our Code of Business Conduct and Ethics. This updated version of our Code reinforces our commitment to integrity and is designed to provide a clear understanding of the standards of behavior expected at IDEX.

to the customers we serve.

Thank you for making me proud to be a member of the IDEX community.

Sincerely,

and

ANDREW K. SILVERNAIL

# **ACTING WITH** INTEGRITY AROUND THE GLOBE

No matter what part of the world or business unit you sit in, our values are a powerful force that unite us as uniquely IDEX. Trust, team and excellence are the promises we make each and every day to one another, and

Our guide for what it means to live these values is outlined in our Code of Conduct. You are expected to read and understand it. And, more importantly, to live it. The purpose of this Code is to create an IDEX community that is aligned around our values and mission. The Code is our commitment to one another and to the stakeholders we serve. It lays the groundwork for how we treat each other, our customers, our suppliers and everyone else we encounter in the business community.

Chairman and Chief Executive Officer

# **OUR CODE APPLIES GLOBALLY**

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IDEX IS A GLOBAL COMPANY. We proudly do business in numerous countries and cultures. A large percentage of our employees and customers reside or operate outside of the U.S. We comply with U.S. law and all of the relevant laws in the places where we do business. It isn't always easy to know what to do in the complex international business environments in which we operate or in every situation that we face. When in doubt, speak up and ask

#### ALL OF US MUST • • • • ..... FOLLOW OUR CODE

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.......

for assistance. 

Officers, directors and employees must follow the Code of Conduct.

If you oversee vendors, consultants, distributors, contractors or agents, you must supervise their work to ensure their actions are consistent with the key principles in this Code. We expect everyone acting on behalf of, or doing business with, IDEX to adhere to our high ethical standards.

# IDEX CORPORATION APPLICABLE LAWS

In our Code, the terms "IDEX" and Our Company is subject to the laws "Company" refer to IDEX Corporation of many countries around the world. and all of our subsidiaries, affiliates Employees are required to comply and business units around the world. with all applicable government laws,

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rules and regulations. If you believe there may be a conflict between applicable laws, or you don't understand which laws govern a particular situation, contact the Legal Department. ....

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# ETHICAL DECISION MAKING MAKING THE RIGHT DECISION

**EVEN WITH THE BEST** intentions and good judgment, making the right decision is not always easy. Use this as a guide.



## **CONSEQUENCES FOR NON-COMPLIANCE**

Compliance with the Code is not voluntary. It is required. We take violations of our Code very seriously. Individuals who fail to comply

- with the Code will be held accountable and can face disciplinary
- action up to and including termination of employment.

# LEADERS SET THE TONE

**SUPERVISORS AND MANAGERS** must lead from the front and model what it means to act with integrity.



# YOUR RESPONSIBILITIES UNDER THE CODE

ALL OF US are expected to understand and follow the Code, but there's more.

**EXPECT YOU TO:** 

Comply with all applicable laws and regulations

# Complete

annual Code of Conduct and periodic Code training in a timely manner

# **Promptly**

report all Code violations and instances of misconduct

Seek

help when you are unsure how to apply Code principles to a specific situation

# Cooperate

fully in all internal and external audits and investigations



# SPEAK UP WHEN SOMETHING IS NOT RIGHT – WE'RE LISTENING

# WHERE TO GO FOR ADVICE & **GUIDANCE ON THE CODE**

**AT IDEX,** there are multiple resources that you can access to get your questions answered and obtain guidance on how to comply with the Code.

#### **OPEN DOOR POLICY**

At IDEX, we have an Open Door philosophy. This means that we encourage employees to report concerns, ask for guidance and voice their opinions. Employees must feel comfortable to raise questions especially when there are gray areas. We support open and honest communication.

Unfortunately, sometimes rules are broken. When that happens, employees must bring those matters to our attention so we can resolve those issues. In fact, when an employee becomes aware of something that may violate our Code, our values, Company policy or the law, he/she is obligated to bring it to the Company's attention.

#### HONEST REPORTING

The Company will protect employees who raise a concern honestly. Employees have the option of reporting concerns anonymously, unless restricted by local privacy laws. However, it is a violation of the Code to knowingly make a false accusation, lie to and/or mislead an investigator. Honest reporting does not mean that an employee has to be certain when making a report or have all the facts; he/she just must have a good faith belief that the information being provided is accurate and truthful.

Any employee who knowingly submits a report that is false or misleading has violated the Code and will be subject to disciplinary action up to and including termination of employment.

#### **RETALIATION IS PROHIBITED**

IDEX is committed to an environment where employees are encouraged to speak up without fear of retaliation. No one should ever be discouraged from raising a concern.

IDEX does not tolerate harassment of, or retaliation against, anyone who speaks up, raises a concern, provides information or otherwise assists in an investigation regarding possible Code violations or violations of applicable laws and regulations. Examples of retaliation may include taking adverse employment action against an employee (e.g., termination, demotion or discipline), harassing an employee, or otherwise excluding an employee in an inappropriate manner. Retaliation itself is a violation of the Code and will result in disciplinary action up to and including termination of employment.

#### SENIOR LEADERS

activities at the Company.

## MANAGERS (YOURS AND OTHERS)

within IDEX.

#### HUMAN RESOURCES

Human Resources can answer questions about appropriate behavior in the workplace and other aspects of the employment relationship between employees and the Company.

The senior leadership team at IDEX is committed to doing business ethically and with the utmost integrity. They drive our "Tone at the Top." They are available to answer questions and provide guidance on all business

We encourage employees to raise questions and concerns to their manager. If you are not comfortable going to your manager, then contact another manager

### LEGAL AND COMPLIANCE DEPARTMENTS

The Legal and Compliance Departments can provide advice and guidance on the Code as well as how to conduct business in compliance with the law and other regulations.

#### **FINANCE AND INTERNAL AUDIT**

The Finance and Internal Audit Departments are available to answer questions related to financial controls and accounting matters.

#### **ENVIRONMENTAL, HEALTH** & SAFETY (EH&S)

The corporate director of Environmental, Health & Safety and EH&S site leaders can provide guidance on matters related to the environment and workplace health and safety issues.

#### HOTLINE

The Hotline is available every day, all day. Reports can be made anonymously to the Hotline. At IDEX, we investigate all Hotline reports. Information regarding the Hotline can be found on Page 35.

# **Raise your** hand and seek assistance

For purposes of anti-bribery laws, the acts of IDEX's distributors, agents, freight forwarders, customs brokers, consultants and any representatives who facilitate Company business may be considered the acts of IDEX itself. Appropriate due diligence must be conducted on these third parties prior to engagement.

# TRUST

**MAKE** and keep commitments | **BE** credible, competent and transparent with facts | ACT with courage, candor and compassion

## **PROHIBITION OF CORRUPT PRACTICES** (BRIBERY/KICKBACKS)

IDEX strictly prohibits bribes and kickbacks of any kind. Bribery and corruption erode public confidence in the marketplace. Employees and third parties acting on behalf of IDEX are prohibited from making improper payments of any type, to government officials or individuals in the private sector, to improperly influence a business or government decision, secure an improper advantage or obtain or

retain business. "Improper payments" includes anything of value such as cash, gifts, meals, entertainment, business opportunities, offers of employment and more. There is no monetary threshold—any amount can be a bribe.

If anyone requests or offers you a bribe, you should refuse it and immediately report the matter to your supervisor and IDEX's Chief Compliance Officer. If you believe that someone is paying or accepting a bribe, you have a responsibility to report it. The Company's values in this respect are consistent with the law in nearly all places where we do business. Violations of these laws can result in serious civil and criminal fines or jail sentences for employees who fail to follow them.

At IDEX, facilitation payments – small payments paid to a government official to expedite or facilitate non-discretionary actions or services-are prohibited.

For more information, refer to IDEX's Anti-Corruption Policy.

#### FAIR COMPETITION

IDEX strives to outperform the competition, but we do so only through free and open competition that is fair and honest. IDEX is committed to complying with all antitrust and competition laws around the world related to how we market, distribute and sell our products and services. IDEX employees are required to respect these laws.

Antitrust and competition laws vary by country, although certain conduct is universally prohibited and may be prosecuted criminally. IDEX employees should never do or attempt to:

- ria bids:
- fix prices or engage in unfair pricing practices such as secret rebates;
- allocate customers or territories; or
- exchange nonpublic information with a competitor.

Improper agreements do not have to be in writing. Even oral agreements and implied promises, reflected in a handshake or nod, may violate anti-competition laws. If a competitor suggests or encourages any anti-competitive conduct in your presence, no matter how casually, you should leave the discussion immediately and report the discussion to the Legal Department.

#### For more information, refer to IDEX's Antitrust/Competition Policy.

#### MAKING THE RIGHT DECISION

A government official threatened to close down the plant if he did not receive a small payment.

A: No matter the size of the payment or the potential loss of productivity, you should never make an inappropriate payment to a government official.

## TRUST

#### DISCLOSE AND REMEDIATE CONFLICTS OF INTEREST

Employees must act in the best interest of IDEX at all times. IDEX employees and their spouses and other family members\* are expected to avoid outside activities that could be advanced at the expense of IDEX's interests. Such involvement may divide loyalty between IDEX and the outside interest or activity and thus create a conflict of interest. Actual conflicts of interests are to be avoided and even the appearance of a conflict can be harmful and, therefore, must be avoided. All potential conflicts of interest must be reported to your manager by completing the Conflicts of Interest Reporting Form (found on the Company's intranet site or by contacting human resources). Your manager, in consultation with the Chief Compliance Officer if necessary, will determine whether an actual or apparent conflict exists. In many cases, potential conflicts can be resolved by open and transparent conversation. Do not continue your involvement in a conflict of interest situation without disclosure and guidance from a manager on how you should proceed.

#### The following are potential conflicts of interest:

#### >> Employment of Relatives

Individuals from the same family may work at IDEX, however to avoid any real, potential or perceived conflict of interest, employees may not hire, supervise or exercise influence over employment decisions involving the following family members: spouse, children, parents and siblings.

\*Throughout the Code "family member" includes any family relationship by blood or marriage, including but not limited to the employee's spouse, domestic partner, sibling, mother, father, stepmother, stepfather, children, stepchildren, grandparents, grandchild, any in-law relationship of a comparable nature and any other member of the employee's household.

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#### >> Relationship with Competitors, Suppliers and Vendors

Employees are prohibited from working for an IDEX competitor. An employee, or his/her family members, entering into a business or personal arrangement with a supplier or customer may cause a potential or real conflict of interest. Employees must disclose relationships where they are consulting for, acting as a director, trustee, board member or partner of, or have an investment or other financial interest (either directly or indirectly through a family member), in an IDEX third party who does business with or seeks to do business with the Company.

#### >> Outside Activities

Employees may have interests and relationships outside of IDEX. While employees are free to pursue those interests, that pursuit must not interfere with their job responsibilities at IDEX. Employees should not use Company resources, including time, for outside employment or personal activities. Employees must obtain written approval from the General Counsel or Chief Compliance Officer before serving as an officer or board member of a for-profit business.

#### >> Improper Personal Benefits

Employees should never accept a personal benefit from a third party offered as a result of their employment at IDEX that is not offered to the general public.

For more information, refer to IDEX's Conflicts of Interest Policy.

All potential conflicts of interest must be disclosed to your manager.

#### FRAUD

and expense reimbursement.



IDEX prohibits any kind of fraud, theft or embezzlement. Employees should never enrich themselves or others while conducting Company business. All requests for reimbursement from IDEX, whether for travel expenses, entertainment, medical claims or other business-related items, must be legitimate, proper and in accordance with applicable IDEX policy. Never alter sales results to meet performance targets or gain some other financial benefit. You must immediately report any suspected or attempted fraud to the Legal Department.

For more information, refer to IDEX's policies relating to travel

#### **INSIDER TRADING**

Employees may have access to information about IDEX, as well as various third parties with whom IDEX does business, including customers and vendors, that others do not have. An employee, and his/her family members, may not buy/sell IDEX stock based on any material non-public or inside information gained through his/her employment. Material nonpublic information is generally considered to be information that a reasonable investor would consider important when deciding whether to buy, hold or sell stock in our Company.

Examples of material non-public information include:

- major unannounced mergers, acquisitions or divestitures;
- financial or performance results;
- gain or loss of a significant customer or supplier; and
- any other events or factors that would cause the Company's financial results to be substantially different from analysts estimates.

Employees are also prohibited from providing inside information to others (called "tipping") to enable them to trade on the information.

For more information, refer to IDEX's Insider Trading Policy.

## TRUST

#### **CORPORATE LOANS**

IDEX will not provide or guarantee loans to any IDEX employee, officer or director that would be prohibited by any applicable law.

#### SUPPLIER SELECTION & PERFORMANCE

Our suppliers are valued partners. We strive to do business with reputable third parties and we strive to be fair in our selection of suppliers and consultants. We select our suppliers and consultants based on qualifications, service, competitive price and a shared commitment to ethical conduct in the workplace. All of our suppliers are required to comply with our Supplier Code of Conduct. Employees involved in selecting suppliers, consultants and other third parties must be objective and fair and disclose any personal, financial or ownership interest in a third party prior, during and throughout the selection process. Not only would accepting excessive gifts or entertainment from a supplier create the appearance of a conflict of interest, but, under some laws, it might be considered a bribe which is against our Code of Conduct.

Employees should also avoid any implication that IDEX's purchase of goods and services is contingent upon the supplier purchasing goods and services from IDEX. That said, employees are not limited or restricted from encouraging our suppliers and other third parties from doing business with IDEX where appropriate.

#### For more information, refer to IDEX's Supplier Code of Conduct.

#### ADVERTISE AND PROMOTE OUR PRODUCTS FAIRLY

We market our products and services with honesty and integrity. It is our responsibility to ensure that all of our advertising and product promotion is truthful and accurate. All claims made in advertisements must be fully supportable. We comply with all advertising and marketing laws in the countries where we do business.



Gifts and business entertainment can create goodwill and foster positive working relationships between our customers and vendors. Employees may offer or accept infrequent, nominal gifts and occasional meals and entertainment. Nominal gifts are gifts valued at less than \$100 USD (or its foreign currency equivalent), or lower where stated by local laws. Employees may never request or solicit gifts and entertainment. Business entertainment must be reasonable in value and frequency and be related to the marketing and promotion of IDEX's products and services and not for a personal benefit.

For more information, refer to IDEX's Anti-Corruption Policy.

## **BE RESPONSIBLE WHEN EXCHANGING GIFTS** AND ENTERTAINMENT

Employees should not be influenced by receiving favors nor shall they try to improperly influence others by providing favors. Lavish gifts or gifts and entertainment that create the appearance of an obligation are not acceptable. Giving or receiving cash or cash equivalents such as gift cards, gift certificates, or stock is always unacceptable, with the exception of gift cards valued at \$50 USD or lower which are acceptable.

No gifts or entertainment should be offered to government officials or their family members for the purpose of improperly inducing or rewarding a favorable action. In many countries, special laws and rules restrict the giving of even the smallest business courtesies to government officials. Never offer anything to a government official unless it is clear that it is permissible under applicable local laws.

Gifts can include anything of value, including but not limited to, meals or entertainment, an internship or job for a family member, tickets to entertainment or sporting events and/or payment of travel expenses.

#### PREVENT MONEY LAUNDERING

Money laundering is the process by which individuals or groups try to conceal the proceeds of illegal activities or try to make the source of their illegal funds look legitimate. At IDEX, we are committed to taking appropriate steps to make sure our goods and services are not being used for illegal purposes, including money laundering, and we conduct business with reputable companies involved in lawful business activities. IDEX requires that we make and accept payments for goods and services only through approved and documented payment practices. It is important to be alert and vigilant in order to spot any suspicious or inappropriate transactions.

#### CHILD LABOR, SLAVERY AND HUMAN TRAFFICKING

IDEX does not engage in, or support, child labor, human trafficking or slavery or knowingly support companies that utilize any form of child labor, slavery or human trafficking.

Never give a gift or entertainment to a government official to influence a business decision.

# TEAM

INSIST on winning together with integrity EMBRACE diversity | SERVICE before self

### WORKPLACE SAFETY

For more information, refer to IDEX's local health and safety policies and guidelines

At IDEX, the safety and wellbeing of our employees is paramount. IDEX complies with applicable health and safety laws in each location where we operate. Employees are responsible for following all safety laws and regulations and Company safety practices. You should never jeopardize your safety or the safety of your coworkers by performing a job in an unsafe manner.

While our goal is to prevent injury or illness in the workplace, if you become aware of any unsafe or hazardous condition, workplace injury or accident, instance of noncompliance or any situation presenting a risk or danger of injury at any IDEX office or facility, you are required to report it immediately to your supervisor or manager. When an unsafe condition or practice is identified, supervisors and managers are expected to promptly correct the condition and prevent it from recurring.



#### **MAKING THE RIGHT DECISION**

Q: I work around a lot of chemicals at my job. What must I do to maintain a safe workspace?

A: Be sure to always understand the chemicals that are in or around your work area. Do not mix chemicals without consulting the user guides or Safety Data Sheets. Ensure proper ventilation and use proper respirators as required.

## TEAM

#### WE VALUE INCLUSION & DIVERSITY

At IDEX, we believe in the power of people and respect individuals of all backgrounds, capabilities and perspectives. We encourage and expect an inclusive environment that promotes individual expression, thought, creativity, innovation and achievement.

We believe that diversity of people and thought inspires a better working environment for all. We seek to hire, develop and retain a diverse workforce. We value individuals of all backgrounds, experiences, approaches and ideas. We expect this same philosophy from those companies and individuals with whom we conduct business.

#### TREAT ONE ANOTHER WITH MUTUAL RESPECT

All individuals are entitled to respectful treatment in the IDEX workplace. Being respected means being treated fairly, honestly and professionally, with each person's unique background, skills and perspectives valued. A respectful workplace is free from unlawful discrimination and harassment, but it involves more than just compliance with the law. It is a work environment that is free of inappropriate and unprofessional behavior and consistent with IDEX's values – a place where all individuals are invited to do their best every day and feel free to report any concerns.

We hire, retain and promote individuals based on qualifications, demonstrated skills, achievements and other merits. We comply with all labor and employment laws all over the world. We also expect our business partners (e.g., suppliers and contractors) to act in a way that is consistent with our fair treatment and equal opportunity standards.

#### DISCRIMINATION

IDEX prides itself on having a workplace with employees from all different backgrounds and we strive to create a workforce as diverse as the markets we serve. We do not discriminate on the basis of race, color, religion, ethnicity, sex, sexual orientation, pregnancy, marital status, national origin, age, disability (physical or mental), gender identity or gender expression, protected veteran's status, genetic information or any other characteristic protected by law. Discrimination in the application process or in the workplace is not tolerated and strictly prohibited.

For more information, refer to IDEX's policies regarding discrimination and equal employment opportunity.



team who tells jokes of a report it?

#### **SEXUAL & OTHER HARASSMENT**

Promoting a high performance environment, where employees are expected to do their best, demands a working environment that is free from harassment and all other offensive or disrespectful conduct. Harassment includes verbal, physical or visual conduct that interferes with another's work environment or otherwise creates an offensive, intimidating, disruptive, abusive or hostile work environment. Sexual harassment can be directed at members of the same or opposite sex.

Examples of harassment can include:

- unwelcome sexual advances or remarks;
- disparaging comments, slurs or jokes relating to race, color, age, gender, sexual orientation or any other category protected by local law;
- displaying or storing written or graphic material that ridicules, insults or shows hostility towards a group or individual;
- distributing or storing pornographic, obscene or sexually suggestive content; or • intimidating or threatening behavior.

For more information, refer to IDEX's policies regarding workplace harassment.

#### MAKING THE RIGHT DECISION

My co-worker is upset by another individual on our sexual nature. Should I report it or wait for my co-worker to

Anyone can and should report misconduct regardless if the misconduct is directed at you or you observe or overhear the misconduct.

#### **OPEN DOOR POLICY**

IDEX has an open door philosophy where employees should feel free to discuss any matter relating to their work conditions with management or Human Resources. We support open and honest communication and encourage our employees to ask questions and report concerns.

IDEX does not tolerate retaliation against any individual who discloses any actual or suspected violations or participates in an IDEX investigation. Retaliation will result in disciplinary action, up to and including termination of employment.

#### **OUR INVESTIGATION PROCESS AT IDEX:**

**Assemble the Investigation Team** – Individuals with the right knowledge, objectivity and discretion

**Conduct Investigation** – Determine the facts through interviews and/or document reviews

Corrective Action - If necessary, recommend corrective action to the appropriate party for implementation

**Feedback** - If appropriate, provide general feedback to the person who raised the concern

## TEAM

#### DRUGS AND ALCOHOL

Our workplace is drug-free and alcohol-free. Being under the influence of, or impaired by, drugs or alcohol while at work, presents a threat to the safety, health and productivity of all employees in our Company and will not be tolerated. Employees may not use, possess, manufacture, distribute, transport, promote or sell illegal drugs or drug paraphernalia while on Company premises (including buildings, parking lots, walkways and any other property leased or owned by IDEX). There may be Companysponsored events where alcohol is served and in those situations all alcohol laws must be followed. Intoxication or excessive drinking at such events is prohibited.

No employee is permitted to report to work or perform any job duties while under the influence of alcohol, illegal drugs or even prescription drugs or over-the-counter medication to the extent that the prescription drugs or over-the-counter medication impairs the employee's ability to perform his/her job responsibilities.

Possession and use of prescription medicine for medical treatment at work may be permitted as long as it does not impair job performance.

#### **VIOLENCE. THREATS & WEAPONS**

The personal safety of our employees is extremely important. Employees are prohibited from engaging in violence or other deliberate acts intended to harm another person or their property, including, but not limited to, making threatening or menacing comments or behaving in such a way that may, or does, threaten the personal safety and/or property of another person. An employee should immediately report any violence or threats of violence against an employee or any other person on Company property.

IDEX prohibits the possession, concealment, use or transfer of any firearm or other weapon that is primarily used to inflict injury on any IDEX premises. This prohibition also applies to employees in any location outside the home when conducting IDEX business.

For more information, refer to IDEX's policies against workplace violence.

Chief Compliance Officer.

#### CHARITABLE AND POLITICAL CONTRIBUTIONS

IDEX is supportive of employees who volunteer in community activities if they choose to do so. Our communities get stronger when people are engaged and invested in making them a better place in which to live. Charitable contributions on behalf of IDEX are permissible only with the prior approval of the

As a matter of personal choice, employees may engage in the political process. As a Company, IDEX generally chooses not to make corporate donations to any political candidates, parties or political action committees. The law generally prohibits the use of corporate resources to support or oppose political candidates. Employees may not solicit contributions for candidates or political causes while on work time or on Company property; and IDEX does not permit the use of Company premises or equipment for political campaigning, fundraising or partisan political activity. Employees must not in any way suggest IDEX support for a particular political party, government official or candidate for office, except under certain circumstances outside the U.S. Employees must not promote their political or personal views or beliefs by posting or distributing signs or other material in offices, workspaces or near Company property. You should consult the Legal Department before serving as a government official or running for elected political office.

## **GLOBAL CORPORATE CITIZENSHIP** AND COMMUNITY SERVICE

At IDEX, we are committed to being a good corporate citizen. The Company donates to various charitable causes around the world. Through the IDEX Foundation, we strive to create value and positively impact the communities in which we live and work by providing financial assistance in the areas of leadership and education; community engagement; and health and safety.

We also encourage employees to work with their colleagues and business units to volunteer and take an active role in their communities to positively impact the lives of others. From partnering with local science, technology, engineering and mathematics (STEM) programs, remodeling teen centers, to donating to disaster relief efforts all over the globe, our people roll up their sleeves and do remarkable things.

#### NON-SOLICITATION ON COMPANY TIME

Solicitations at work can be a distraction from worker effectiveness. Therefore, IDEX prohibits: solicitations during work time; distribution of non-business literature in working areas at any time; solicitation on IDEX's behalf, during work hours or on our property, for any political party, organization or committee or candidate; and distribution or solicitation by non-employees on IDEX's premises without prior management approval or unless permitted under local law.

For more information, refer to IDEX's policies regarding drugs and alcohol in the workplace.

Employees are obligated to keep accurate and truthful books and records that comply with applicable accounting procedures and internal controls. Intentionally misrepresenting, falsifying or backdating information in Company books and records is a serious violation of the Code and possibly the law. Business records include, but are not limited to, financial and accounting records, business plans, invoices, payroll records, inventory reports, environmental reports, injury and accident reports, medical claim and medical leave requests, expense reports, time cards and reports filed with the Securities and Exchange Commission. Your obligation as an employee is to make sure entries made to our books and records are timely, complete and not misleading or false. No undisclosed or unrecorded funds or Company assets should be treated or maintained for any reason or purpose. If anyone asks you to improperly or inaccurately prepare a business record, you must report it immediately.

IDEX is committed to strict product integrity. Every IDEX employee is responsible for ensuring the integrity of the products under his/her control and for the accuracy of the documentation he/she provides supporting product integrity. It is IDEX policy to never willfully conceal defective work or material, falsify records, or make false certifications or claims regarding our products. An employee should immediately advise his/her supervisor and the Legal Department of incidents of suspected or known concealment of defective work or material or falsification of records.

# EXCELLENCE

**EXERCISE** discipline and focus | MAKE a positive impact **BUILD a legacy of greatness** 

#### ACCURATE AND HONEST BUSINESS RECORDS

#### DATA PRIVACY

We respect the privacy of our employees, customers, suppliers and business partners. Data protection and privacy laws, regulations, standards and enforcement vary by country. We collect, use, transfer and safeguard personally identifiable and other sensitive information in compliance with IDEX privacy policies, contractual obligations and applicable privacy and data protection laws in the countries in which we operate. We never share personal data with anyone who does not have a business reason to know it. Never leave personal information about yourself or others such as performance reviews, family and financial information, salary information or medical information, unsecured in plain sight, on a desktop or in any accessible location.



#### **PRODUCT INTEGRITY & QUALITY**

## **CONFIDENTIAL AND PROPRIETARY INFORMATION &** INTELLECTUAL PROPERTY

As an IDEX employee, you must protect the Company's confidential and proprietary information and only share such information with individuals who have a need to know. Our Company confidential, proprietary and trade secret information is a valuable asset and one of the keys to our success. Such information may include, but is not limited to:

- confidential client and customer lists:
- confidential product pricing information;
- nonpublic financial or product development information;
- market data and analysis;
- engineering and product specifications, drawings and designs;
- significant projects, including proposed acquisitions and divestitures; and
- cost information.

Employees should also use reasonable safeguards to protect against accidental, unlawful or unauthorized disclosure of confidential information. Make sure that you obtain confidentiality agreements with third parties before sharing confidential information.

You may be asked to provide confidential or proprietary information either internally or externally. In many countries, there are strict laws governing the transfer of confidential information. Before sharing confidential information either inside or outside of IDEX make sure the recipient: (i) is authorized to receive the information; (2) is aware the data is confidential; and (3) understands how the data can be used.

Employees must also safeguard the Company's brands and prevent the improper use of the brand names of the various products doing business under the IDEX name.

For more information, refer to IDEX's policies regarding Company confidential information.

#### CYBERSECURITY

The more we rely on technology to collect, store and manage Company information, the more vulnerable we become to security breaches. Human errors, hacker attacks and system malfunctions can cause great financial damage and may jeopardize our Company's reputation. It is critical that you remain vigilant and take all reasonable precautions to prevent potential cyber security attacks.

When you use digital devices to access Company emails or accounts, that can introduce security risk to our confidential information and data. Employees should keep Company-issued computers, tablets and cell phones secure by following these guidelines:

- keep all devices password protected;
- ensure that you do not leave your devices exposed or unattended (i.e., use the "lock" function):
- install security updates promptly;
- log into Company accounts and systems through secure and private networks;
- avoid transferring sensitive data to other devices;
- ensure that recipients of confidential data are properly authorized people or organizations; and
- report all security incidents, including stolen or lost digital equipment, immediately.

We expect employees to honor any contractual obligations regarding confidential, proprietary and/or trade secret information that they may have with a previous employer.

We also expect employees not to misuse any confidential information of our suppliers, business partners or customers.

#### **COMPETITIVE INFORMATION & INTELLIGENCE**

Employees are encouraged to collect, share and use information about our competitors, but to do so in a legal and ethical manner. Just as we value and protect our confidential, proprietary and trade secret information, we respect this information of other companies.

It is acceptable to collect competitive information through publicly available information or ethical inquiries. You may ask third parties about our competitors and accept such information as long as there is no reason to believe that the third party is under a legal, contractual or ethical obligation not to reveal such information.

You should never engage in secret, illegal or illicit activity to obtain competitive information, such as theft, hacking, trespassing, misrepresentation or invasion of privacy. Do not accept, disclose or use competitive information that you know or have reason to believe was disclosed in breach of a confidentiality agreement between a third party and one of our competitors. If you come into possession of confidential business information that belongs to another company, advise your manager and the Legal Department immediately so it can be properly handled.

## **COOPERATE WITH AUDITS. INVESTIGATIONS** AND GOVERNMENT INQUIRIES

Employees are required to cooperate fully in all internal and external audits and investigations. Employees may not destroy any documents related to an audit or investigation and must disclose any and all relevant information in a complete and truthful manner. No employee may take any action to fraudulently influence, coerce, manipulate or mislead any independent public or certified accountant engaged in the performance of an audit of the Company's financial statements or any member of IDEX's Internal Audit, Legal or Compliance Departments engaged in the performance of any internal audit or investigation. Employees are required to maintain the confidentiality of matters pertaining to investigations.

Any employee who interferes with, fails to cooperate with, or provides false or misleading information in the course of an audit or investigation may be subject to disciplinary action up to and including termination of employment.

**Employees are required to** cooperate fully in internal and external audits and investigations.

## **PROTECTING COMPANY ASSETS & USE OF COMPANY ELECTRONIC RESOURCES**

Employees have a responsibility to safeguard and make only proper and efficient use of all Company assets and equipment, including computer hardware and software, laptops and accessories, copiers, mobile phones, materials and office supplies, internet services, Company credit cards, scrap and obsolete equipment, vehicles and land and buildings. Employees also have the responsibility to protect Company assets and equipment from loss, damage, theft, fraud and destruction. Theft of Company assets – whether physical assets or theft through intentional misreporting of Company time or expenses-may result in termination of employment.

While the primary purpose of the Company's electronic technology resources is business use, the occasional personal use is permitted, as long as it does not interfere with work duties, violate the law or Company policy. The Company has a valid business reason for access to all information sent to, received on, or stored or IDEX IT systems to ensure proper use, except where prohibited by local law. When using Company technology resources, employees must follow all anti-discrimination and harassment policies. Sending, saving or viewing offensive, discriminatory, harassing, defamatory or threatening material using IDEX electronic resources is prohibited. Employees may not use IDEX electronic resources to solicit for religious or political purposes, or for other activities unrelated to Company business.

Employees should never loan, borrow, sell or dispose of Company property unless specifically authorized to do so by an appropriate manager.

For more information, refer to IDEX's Control of Capital Assets Policy and Appropriate Use of IDEX's IT Systems Policy.

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#### MAKING THE RIGHT DECISION

Q: I travel quite a bit for my job. Can I use the computer to read news articles or watch movies while I am traveling?

A: Yes. Limited personal use of Company resources is acceptable. You should use your judgment and discretion to determine if your personal use of Company resources is excessive.

#### SOCIAL MEDIA

For more information, refer to IDEX's Social Media Policy and IDEX's Branding Guidelines.

What we say, email, blog, post or tweet can reach many people in seconds. That is why when using social media it is important that you exercise good judgment and caution. Whether using Company owned or personal equipment, you should never disclose any confidential or proprietary information or post false information or rumors about IDEX. If you are a manager or supervisor, you should be careful to avoid social media relationships with non-managerial employees, except for business-related networking or other legitimate business purposes. If you use social media as part of your job responsibilities with IDEX, remember that Company policies apply in the social media environment. When posting on social media outside of your job responsibility, you should always be clear that you are expressing your personal opinions and not the opinions of the Company.



#### MAKING THE RIGHT DECISION

Can I post my personal political views on social media?

A: Yes, employees have a right to express their personal political beliefs. However, you must always use caution and good judgment. Never suggest that your political beliefs are the beliefs of IDEX. Be careful what you say if employees in your organization are part of your social media network. Never pressure other employees to agree with your personal views.

#### MEDIA RELATIONS

As a publicly traded Company, we are subject to strict regulations regarding disclosure of material information and it is critical for us to speak with "one voice" to the community outside of IDEX. From time to time, the media may contact you about a matter involving the Company. It is our policy to respond to all inquiries truthfully and completely. However, if you are contacted by the media, you should refrain from providing any information and contact your supervisor and the Legal Department immediately. This helps ensure that the Company provides a consistent and accurate message to all appropriate parties and minimizes unauthorized or confidential disclosures to outside third parties.

#### LEGAL PROCEEDINGS

From time to time, the Company is required to respond to formal legal claims or inquiries from government regulators. The claims may involve subpoenas, complaints, summons or other official correspondence. Any employee who receives any of these documents should forward them to the Legal Department immediately. In addition, you should contact the Legal Department if you are contacted by an attorney or a government or law enforcement officer by telephone or in person. The Legal Department must be made aware of the inquiries or investigations where permitted by law in order to assist in coordinating the Company's response. We cooperate fully with government entities. We expect that all employees will provide true and accurate information in a government inquiry.

Some official court or government documents that are directed to the Company are required by rules to be personally delivered to a designated representative of the Company. Unless you are authorized by the Company to accept official papers, like a subpoena, you should decline to do so. If asked to explain your refusal, you should advise that you are not an authorized person to accept the document.

#### ENVIRONMENTAL PROTECTION

IDEX is serious about its corporate responsibility for environmental protection and complies with all applicable laws and regulations protecting the environment. We show our respect for the environment by constantly looking to reduce the environmental impact of our operations, manage our energy usage and minimize any environmental hazards.

#### **MAKING THE RIGHT DECISION**

What should I do if I am contacted by a government regulator?

**A** Notify your manager and the Legal Department immediately.

- origin determination;

All requests for trade information by any government agency as well as any impromptu requests by a government official to visit an IDEX facility must be sent to the Compliance Department for approval and handling.

#### INTERNATIONAL TRADE

As a global Company with international supply chains and trade channels, it is IDEX's policy to comply with all local and international import, export, and trade compliance laws, and to ensure that accurate data and documentation is provided to all government agencies. Employees are required to comply with all local and international laws and regulations that govern:

• imports, including laws regarding valuation, tariff classification and country of

• export controls, trade embargoes and restrictions, sanctions and boycotts; and • remedies to unfair trade practices, such as anti-dumping and countervailing duties.

For more information, contact the Compliance Department.



## FOLLOW RULES THAT APPLY TO GOVERNMENT CUSTOMERS

IDEX follows all rules related to contracts with municipal, provincial, state and national governments and government-owned entities around the globe. When working with a governmental entity, employees are responsible for knowing and complying with all applicable laws, rules and regulations. Please contact the Legal Department for help and assistance. We must avoid even the appearance of impropriety when dealing with a government customer. Never make false or incomplete statements to the government; never give gifts, money, entertainment or anything else of value in order to influence a government contract; and ensure that all claims, invoices and statements submitted on behalf of the Company are truthful and not misleading.

### **RECORDS RETENTION**

At IDEX, we create, retain and dispose of our business records, written and electronic, as part of our normal course of business and in accordance with our Records Retention Policy. As part of our internal controls, IDEX requires that all business transactions be properly recorded, classified and documented.

From time to time, documents in your possession may relate to litigation, pending or threatened investigations, subpoena or some other regulatory action. If you are notified that documents within your control are subject to a "legal hold," you must not destroy those documents until the Legal Department advises that the hold has been lifted.

For more information, refer to IDEX's Records Retention Policy.

# CONTACTING THE HOTLINE

# WHAT TO EXPECT WHEN YOU CALL THE HOTLINE

**THE HOTLINE** is available every day, all day. You can remain anonymous.

## STEP 1

You may contact the Hotline by phone or internet.

### STEP 2

Your call is answered by a non-IDEX multi-lingual operator. You can remain anonymous.

## STEP 3

**Operator takes notes** about the incident or concern including date of the incident, people involved, and location where the incident occurred.

## **STEP 6**

At the conclusion of the investigation, if the report is substantiated, disciplinary action, including termination, may be taken. Investigation results are confidential therefore, complainants will not be advised how the case is resolved.

# **HOW TO CONTACT** THE ETHICS HOTLINE

#### COUNTRY

#### STEP 4

Operator inputs the information into an online portal that the Hotline team at corporate headquarters can access. You will receive an identification number so you can check the status of the case online.

## STEP 5

Hotline team investigates every matter. You may be contacted through the anonymous identification number to provide more information. We strive to complete investigations within 45 days, subject to the nature of the matter being investigated.

Phone: 1.866.292.2089 (International numbers below) Web: www.ethicspoint.com

#### **Global Hotline Access Numbers**

To call into the Ethics hotline, use the following telephone numbers:

#### **INTERNATIONAL TOLL FREE NUMBERS**

| Australia       |                                  | Jordan                | 1-880-0000 (At prompt dial 866-292-2089) |
|-----------------|----------------------------------|-----------------------|--|
| Austria         |                                  | Korea (South)         | 00798-14-800-6599                        |
| Belgium         |                                  | Mexico                | 001-800-840-7907 or 001-866-737-6850     |
| Brazil          |                                  | Poland                |  |
| Canada          | 1-866-292-2089 or 1-855-350-9393 | Netherlands (Holland) |  |
| China (telecom) |                                  | New Zealand           |  |
| Denmark         |                                  | Singapore             |  |
| France          |                                  | Spain                 |  |
| Germany         |                                  | Sweden                |  |
| Hong Kong       |                                  | Switzerland           |  |
| India           |                                  | United Arab Emirates  |  |
|                 |                                  |                       | (at prompt dial 866-292-2089)            |
| Italy           |                                  | United Kingdom        |  |
| Japan (telecom) | 0066-33-112505 or 00531-121520   | United States         |  |
|                 |                                  | Puerto Rico           |  |

## RESPONSIBILITY

The responsibility for administering the Code rests with the Chief Compliance Officer, with oversight from the General Counsel and the Audit Committee of the Board of Directors.

# & TRAINING

All employees are required to certify annually that they have read, understand and will follow the Code. Employees are also required periodically to complete Code training. Failure to complete annual Code certification and/or Code training may result in disciplinary action up to and including termination.

# ADMINISTERING THE CODE

# ANNUAL CERTIFICATION

## **CODE AMENDMENTS**

From time to time, it may be necessary to amend the Code. Any material amendment to the Code must be reported to the Company's Nominating and Corporate Governance Committee. Employees will be notified of all updates to the Code.

## WAIVING OUR CODE OF CONDUCT

Code waiver requests must be approved in writing by the General Counsel or Chief Compliance Officer and disclosed to the Board of Directors.



## **KEY POLICIES**

**THE CODE** does not address all workplace conduct. The Company maintains several policies and guidelines that address matters in the Code as well as matters not covered in the Code. All IDEX policies can be accessed through the Company's intranet site. Employees must check the intranet site and local business unit policies to ensure that you have the latest and most applicable policy. You should also check your local business unit policies and handbooks for any local guidelines. Here is a list of key corporate policies:

# Anti-Corruption Policy Antitrust/Competition Policy Appropriate Use of IDEX IT Systems Policy Asset Disposition Policy

Company Confidential Information Policy Conflicts of Interest Policy Drug and Alcohol Use Policy Employment of Relatives & Personal Relationships in the Workplace Equal Employment

Opportunity Policy

Expenses Reimbursable to Employees Policy Insider Trading Policy Records Retention Policy Related Person Transactions Policy Social Media Policy Supplier Code of Conduct Trade Compliance Manual

Workplace Harassment Policy Workplace Violence Policy For more information, refer to these and other applicable Business Unit and IDEX policies

# LIVE THE CODE

