

The IDEX Corporation Anti-Corruption & Anti-Bribery Policy is a comprehensive framework designed to ensure ethical business practices and compliance with global anti-corruption laws. It outlines clear guidelines and procedures for preventing bribery and corruption, including periodic assessments, strict prohibitions on improper payments, guidelines for gifts and entertainment, and processes for third-party due diligence. The policy emphasizes the importance of accurate record-keeping and encourages employees to report violations without fear of retaliation. Though this and other policies, including the [IDEX Code of Conduct and Business Ethics](#), IDEX aims to maintain its commitment to ethical conduct and legal compliance in all its business operations.

PURPOSE

The policy aims to uphold the highest ethical standards and ensure compliance with laws, rules, and regulations applicable to IDEX. It prohibits all forms of bribery and corruption, both in the government and private sectors, and covers applicable anti-bribery laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act (UKBA). The policy is intended to make IDEX employees aware of legal prohibitions to recognize and address potential problems appropriately.

SCOPE & RESPONSIBILITY

The policy applies to all IDEX and all of its business units worldwide and requires compliance from all employees, officers, directors, and third parties working on behalf of IDEX.

KEY SECTIONS

1. Anti-Corruption Program

IDEX conducts periodic anti-corruption assessments and audits to monitor adherence to the policy and raise awareness of the company's anti-corruption efforts. Employees and third parties are expected to cooperate with these audits and investigations.

2. Bribes and Improper Payments

The policy strictly prohibits bribes, kickbacks, and improper payments of any kind. This includes offering anything of value to foreign officials or individuals in the private sector to influence business decisions or secure improper advantages.

3. Facilitation Payments

Facilitation payments, or nominal bribes to expedite routine actions, are prohibited. Payments must be legitimate business expenses and publicly documented.

4. Gifts and Business Entertainment

Gifts and entertainment are not to be used to improperly influence decisions. Gifts to government officials require preapproval, and all gifts and entertainment must be reasonable, transparent, and properly recorded. Specifically, IDEX *prohibits* cash gifts and gifts exceeding \$100 USD. Gifts and entertainment may be provided only if legal under all applicable rules and regulations.

5. Site Visits

IDEX requires preapproval if a business unit wishes to pay third-party travel expenses for customer or vendor site visits. Specifically, approval from the business unit leader and the Corporate Compliance Department is required, and all expenses must follow IDEX's travel reimbursement policies. Travel and lodging must be arranged by IDEX directly, and gifts in connection with site visits (if any) should be of nominal value.

6. Political Contributions

The use of corporate resources for political campaigning or fundraising is prohibited. Employees may not solicit contributions for political causes while on work time or on company property.

7. Charitable Contributions

Donations to improperly influence government officials are prohibited. Charitable contributions on behalf of IDEX require prior approval from the Corporate Compliance Department. Employees may donate to charities on their own behalf.

8. Conflicts of Interest

The policy incorporates by reference the IDEX Conflict of Interest Policy for guidance on managing conflicts that could lead to corruption risks. Employees are expected to avoid conflicts of interest and report any potential conflicts.

9. Third Party Due Diligence

IDEX maintains a process for vetting third party channel partners to ensure compliance with anti-corruption standards. This includes signing a Compliance Agreement and undergoing background screening by a third-party vendor. The due diligence process consists of onboarding and periodic renewal based on risk ratings (High-Escalate, High, Medium, Low). Third parties must comply with the process at onboarding and recertify periodically based on defined risk factors.

10. Accurate Books and Records

IDEX requires accurate, truthful, and transparent business records. Falsification of records is strictly prohibited, and a system of internal accounting controls is maintained to ensure compliance. Business records include financial statements, personnel documents, time cards, medical leave forms, safety records, and expense reports.

REPORTING VIOLATIONS

Employees are encouraged to report suspected violations to the Legal or Compliance Department or through the Ethics Hotline. Retaliation for good faith reports is prohibited, and failure to report suspected violations constitutes an independent violation of the policy.

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