

	POLICIES & PROCEDURES
Subject: Anti-Corruption & Anti-Bribery Policy	Number: LGL-07-100
Scope: All IDEX Business Units Worldwide	Last Updated: June 2020
Administration: This document is maintained and updated by the IDEX Compliance Department. Inquiries regarding interpretation or revisions of this policy should be directed to the Company’s Chief Compliance Officer and/or the General Counsel.	

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1.0 Purpose

The IDEX Code of Business Conduct and Ethics (“the Code”) and other Company policies and procedures set forth standards of conduct and ethics that are expected and required of all directors, officers, and employees of IDEX Corporation and its Business Units (collectively referred to as “IDEX” or “the Company”). These policies reflect not only the “right thing to do” from a general business perspective, but also require compliance with laws, rules, and regulations applicable to IDEX. The Company is committed to conducting business in accordance with the highest ethical standards and prohibits all forms of bribery and corruption.

In certain instances, IDEX's compliance with laws, rules, and regulations can be affected by the actions of its dealers, distributors, sales agents, sales representatives, suppliers, and other third parties. Accordingly, compliance with this policy is expected of all parties with whom IDEX does business.

This Anti-Corruption & Anti-Bribery Policy ("the Policy") prohibits bribery of government officials as well as bribery in the private, commercial setting. This Policy will cover applicable anti-bribery laws, including the U.S. Foreign Corrupt Practices Act ("FCPA") and the U.K. Bribery Act ("UKBA"). This Policy is intended to make employees aware of the prohibitions under the law so that employees can recognize potential problems and address them appropriately. Violations of anti-corruption laws can lead to severe criminal and civil penalties and reputational damage to the Company. As such, violations of the law and/or this Policy can lead to discipline, up to and including termination of employment.

This Policy supplements the Code and any other Company policies and procedures that govern standards of conduct and ethics in the workplace. IDEX requires compliance with the standards set forth in this Policy. While this Policy addresses IDEX's prohibition against corruption and provides guidance on adherence with anti-corruption and anti-bribery laws, this Policy cannot cover every situation. Therefore, we ask each of our employees to use common sense while conducting Company business and to seek clarification where necessary.

If questions arise regarding the interpretation of this Policy or anti-corruption laws generally, please reach out to a manager, human resources, IDEX's Chief Compliance Officer or General Counsel and/or the ethics hotline (for a full listing of contact numbers, please see the [Code of Business Conduct and Ethics](#)).

2.0 Scope & Responsibility

IDEX expects all employees, officers, directors, and third parties working on its behalf to refrain from engaging in any form of bribery or corruption (both public and private) regardless of citizenship or location. In addition to the general prohibition on bribery and corruption, this Policy sets forth a number of procedural requirements that apply to employees of IDEX and its Business Units ("BUs").

3.0 Anti-Corruption Program

IDEX conducts periodic anti-corruption assessments and audits to monitor adherence to this Policy and the law, detect and remedy any potential misconduct, and to raise overall awareness of the Company's anti-corruption program. IDEX expects all employees, officers, directors, and third parties to cooperate with, and to never interfere with, such audit activities or any Company investigation.

4.0 Bribes and Other Improper Payments

In order to maintain an ethical culture and to fully comply with relevant laws, IDEX strictly prohibits bribes and kickbacks of any kind. Whether a particular payment could be perceived as a bribe or a kickback depends on the timing and context surrounding the payment, including the past, pending, or future business transactions that are within the recipient's realm of influence.

As a U.S. publicly-traded company, IDEX and its BUs are subject to the FCPA. The FCPA prohibits publicly-traded companies, their subsidiaries, and those companies' officers, directors, employees, and agents, from: (i) offering, authorizing or giving anything of value; (ii) to foreign officials, foreign political parties or their officials, or candidates for public office; (iii) for the purpose of obtaining or retaining business for or with, or directing business to, any company, or to secure any improper advantage.

Through its enforcement of the FCPA, the U.S. government broadly defines "anything of value" to include cash, cash equivalents, contract, business opportunities, charitable donations, and other incentives that are designed to improperly obtain or retain business. Moreover, the U.S. government also takes a broad view of "foreign officials," and in its definition includes employees of state-owned companies (e.g., a shipping clerk at a state-owned oil company). For further information about the FCPA, please contact the Corporate Compliance Department or consult the U.S. Department of Justice's FCPA Resource Guide.

Moreover, as a company doing business in the United Kingdom, IDEX is subject to the UKBA. The UKBA prohibits bribes to any person – not just foreign officials – and applies to both the bribe payer and recipient. For further information about the UKBA, please contact the Corporate Compliance Department.

Employees and third parties acting on behalf of IDEX are prohibited from directly or indirectly making or offering 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. "Bribes" and "improper payments" include, but are not limited to: cash, gifts, meals, entertainment, business opportunities, loans, offers of employment, favors, services, and discounts. **There is no monetary threshold.** Any amount can be a bribe or an improper payment if paid or offered for an improper purpose.

In addition to the prohibition against bribery, kickbacks or other improper payments, IDEX directors, officers, and employees are prohibited from soliciting or receiving bribes or improper payments.

5.0 Facilitation Payments

IDEX prohibits any facilitation payments (sometimes referred to as "grease payments") regardless of value or whether such payments are considered legal or customary in a local

jurisdiction. A facilitation payment is a nominal payment that is made to a government official or employee to perform or speed up a routine, non-discretionary action or process, such as obtaining a permit or a product certification, providing utility services, processing government papers such as visas, securing the release of goods held in customs, or similar types of actions.

However, payments that are available to be made by anyone, are displayed or published publicly, have appropriate support (invoices/receipts), are made to the governmental organization/entity performing the task **and** are for an action or process to which someone is legally entitled to, are **not** regarded as facilitation payments and are allowable under this Policy.

If your safety, or that of another individual, is at issue, payments that otherwise would be prohibited or which would otherwise require prior approval pursuant to this Policy (or any other Company policy) may be made without such prior approval, if necessary to ensure the immediate safety or safe passage (such as by allowing individuals to leave a particular location or country). In those circumstances, you should make whatever payments are necessary to protect your safety and the safety of others, but must, as soon as reasonably possible, report the nature of the incident and related payment to the Corporate Compliance Department as soon as you are able.

6.0 Gifts and Business Entertainment

One of the most common areas in which corruption can occur is giving and receiving of gifts and entertainment. It is against this Policy to provide gifts, meals, travel or entertainment in order to improperly influence anyone, particularly a government official, in exchange for any improper favor or benefit.

However, IDEX understands that gifts and business entertainment, particularly in some cultures and in locations where IDEX conducts business, are an important aspect in building relationships with business partners. As such, *reasonable* gifts and business entertainment that are legitimately related to the marketing and promotion of IDEX products, services, or technologies are allowed so long as they:

- are permitted under all applicable local laws, rules and regulations;
- do not conflict with any internal policy, rule or regulation of any relevant party; **and**
- are properly and accurately reflected and accounted for in IDEX's books and records.

6.1 *Gifts*

Giving or receiving lavish or frequent gifts can be perceived as an attempt to improperly influence decisions in matters affecting IDEX business. The giving and receiving of gifts should be done in an open and transparent manner and the gifts should not be of a type, or given in a manner, that you believe would be embarrassing to you, the giver or recipient, or IDEX, or detrimental to the Company's business or reputation, were it to be disclosed publicly.

The following guidelines should be followed when providing gifts to third parties *and* when accepting gifts from customers, suppliers, and other business partners, both in commercial and government settings:

- No cash gifts
- No cash equivalents (e.g., gift cards) valued more than \$50 USD
- Gifts cannot exceed \$100 USD or equivalent with non-government officials
- Gifts should never be offered or made to improperly influence a decision
- Gifts must always be recorded properly in the BU's books and records
- IDEX promotional/logo items should be used whenever possible (e.g., shirt, pen, USB drive, etc.)

To avoid even the appearance of impropriety when interacting with government officials, all gifts provided to government officials or any employees of a state-owned enterprise, regardless of their value, must be approved in advance by the Corporate Compliance Department.

Gifts provided during a trade show do not need to be recorded in a gift registry. However, all trade show gifts should be the same and not dependent on the customer or potential customer. In addition, trade show gifts should follow the same guidelines above.

6.2 Business Entertainment

Similarly, to gifts, IDEX understands that occasional entertainment can foster our business relationships. However, business entertainment should never be used to influence a decision.

While the business entertainment limits below apply in both commercial and government settings, entertainment to government officials should be avoided when possible or limited to meals that coincide with business meetings. The following guidelines should be followed when providing business entertainment to third parties:

- Business entertainment may be provided only if legal under all applicable laws, rules and regulations **and** any internal policies
- Business entertainment must be reasonable in value and frequency and should adhere to IDEX's Expenses Reimbursable to Employees limits
- Business entertainment must always be recorded properly in the BU's books and records to ensure that there is company-wide transparency regarding the interactions; documentation should include the business purposes, names, and titles of the individuals and recipients participating, the type of entertainment activities, the total spend, and the amount spent per person
- Business entertainment must be connected to legitimate business and never include drugs, sexual services, or other illegal activities

- All expenses for meals and other business entertainment paid by IDEX must be paid and submitted for reimbursement by the highest level IDEX employee in attendance
- Employee should not pay for business gifts, meals, and entertainment or travel out of their own pocket to avoid these guidelines or IDEX policies
- IDEX employees should always be present during business entertainment

Finally, IDEX directors, officers and employees are prohibited from soliciting gifts/entertainment at any time. Additionally, IDEX employees are prohibited from receiving gifts and/or business entertainment (including services, discounts, and material goods) from third parties, except for non-monetary gifts of nominal value and business entertainment that is customarily offered by such third parties to other persons having a similar relationship with it.

For specific questions about gifts or business entertainment, please contact your supervisor or the Corporate Compliance Department.

7.0 Site Visits

IDEX facilities often host visitors for factory acceptance tours, supplier inspections, training, and other related events. However, the presence of outside visitors at an IDEX facility can also expose the company to potential corruption concerns, corporate espionage and/or trade compliance violations.

Accordingly, while it may occasionally be appropriate to arrange and pay for travel expenses (e.g., airline or train tickets, hotel accommodations, or meals) of third parties to visit IDEX facilities or locations where IDEX products are in use -- for such purposes as product training and demonstration, quality review or other legitimate business reasons -- approval is required from the BU leader **and** the Corporate Compliance Department.

Whenever a BU is requesting approval to pay traveling expenses of a third party for a site visit, the following conditions apply:

- A **Site Visit Approval Request** form <https://sitevisitapprovalrequest.ethicspoint.com> must be submitted and approved by the BU leader and the Corporate Compliance Department prior to arranging and disbursing funds for travel
- All expenses should follow IDEX's Expenses Reimbursable to Employees Policy
- All travel and lodging must be arranged and purchased by IDEX directly (and not by the third party) or through an independent travel agent who bills IDEX directly
- Airline tickets can be purchased only for economy class travel
- All meals and entertainment must be reasonable in value and frequency, in accordance with the entertainment guidelines set forth above, and in adherence to IDEX's Expenses Reimbursable to Employees Policy limits
- Gifts in connection with site visits are discouraged, and if given, should be of nominal value

- “Side visits” to locations other than IDEX facilities and locations where IDEX products are displayed/promoted will not be approved through the process

8.0 Political Contributions

The law generally prohibits the use of corporate resources to support or oppose political candidates. As such, IDEX does not permit the use of Company equipment for political campaigning, fundraising, or partisan political activity. Employees may not solicit contributions for candidates or political causes while on work time or on Company property. Employees may not promote their political or personal views or beliefs by posting or distributing signs or other material in offices, workspaces, or near Company property.

9.0 Charitable Contributions

It is against this Policy to provide a donation to improperly influence a government official or in exchange for any improper favor or benefit. However, this Policy does not prevent employees from donating to charities on their own behalf.

As an IDEX director, officer or employee, you may receive requests from charities, customers, or other third parties for contributions from IDEX, such as requests for donations of equipment, direct cash donations, or the purchase of tickets for fund-raising events. Charitable contributions on behalf of IDEX are permissible only with the prior approval of the IDEX Corporate Compliance Department. Please submit all requests for approval for charitable contributions to the Corporate Compliance Department at:
<https://charitablegivingapprovalrequest.ethicspoint.com>.

10.0 Third Party Due Diligence

Based on our relationships with third party sales intermediaries, such as distributors and sales agents, IDEX may be exposed to liability as a result of their inappropriate behavior. To ensure we are engaging in business with third party sales intermediaries who share our same values and commitment to integrity, IDEX requires that such third parties: (i) complete a Compliance Agreement, which requires third parties to acknowledge their compliance with this Policy and all relevant laws; **and** (ii) pass a due diligence check (where applicable) through the Company’s due diligence platform Red Flag Compliance Desktop.

Unless authorized by the Corporate Compliance Department, third party sales intermediaries should not be engaged until they have completed both the Compliance Agreement **and** the due diligence check (where applicable). Moreover, third party sales intermediaries who have not kept current with these requirements will be placed on a credit hold, a “do not ship” list and/or otherwise be prevented from engaging in additional business with the relevant IDEX BU.

For a complete explanation of the workflow required for third party compliance, please see the [RedFlag FAQs](#) and [supporting documentation](#) on the IDEX intranet.

11.0 Accurate Books and Records

It is IDEX's policy to maintain a system of internal accounting controls and to maintain books and records which, in reasonable detail, accurately and fairly reflect transactions and the disposition of assets. False, misleading, or incomplete entries in such records or in other documents are strictly prohibited. Furthermore, undisclosed or unrecorded funds or accounts may not be established for any purpose.

Expenses incurred by directors, officers and employees of IDEX should be supported by a detailed description of activities and the actual, valid receipts, or invoices reflecting the amounts incurred. Either the knowing submission (by any director, officer or employee) or acceptance (by any accounting or other personnel) of fake or false receipts or invoices is strictly prohibited.

A system of accounting controls shall be maintained that provides reasonable assurances that: (i) transactions are executed in accordance with management authorization; (ii) transactions are recorded to permit preparation of accurate financial statements and to maintain accountability for assets; (iii) access to assets is permitted only in accordance with management authorization; and (iv) appropriate auditing functions are conducted.

12.0 Exceptions

Any exceptions to the processes, procedures and controls set forth above must be approved and authorized in writing by IDEX's Chief Compliance Officer and/or General Counsel.

13.0 Reporting Violations

If you observe conduct that may violate this Policy, contact the Legal or Compliance Department or the ethics hotline (for a full listing of contact numbers, please see the [Code of Business Conduct and Ethics](#)). Suspected violations will be reviewed and investigated as appropriate and may lead to disciplinary action, up to and including termination of employment. Any such reporting will be treated as confidential in accordance with the law. IDEX strictly prohibits retaliation for good faith reports of suspected misconduct. Failure to report a suspected violation of this Policy constitutes an independent violation of this Policy and the Code, which is subject to discipline, up to and including termination of employment.

14.0 Amendment History

CP/P	Rev	Date	Description of Change	Originator	Approved By
CP1.08 0	0	5/6/2009	Initial Release	Craig Boyd	IDEX General Counsel
CP1.08 0	1	11/6/2009	Modify Implementation	Craig Boyd	IDEX General Counsel
LGL- WW- 40-100	2	2/15/2012	Update for Changes in Personal, Law and Procedures; Change in policy title	Garin Bergman	IDEX Chief Compliance Officer
LGL- WW- 40-100	3	6/4/2019	Update to conform with refreshed Code of Conduct and Business Ethics	Abigail Roche/ Terrance Gainer	IDEX Chief Compliance Officer
LGL- WW- 40-100	4	6/15/2020	Update to remove reference to outdated appendixes	Terrance Gainer	IDEX Chief Compliance Officer