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### **CUSTOMER TRIP POLICY**

#### BACKGROUND PRINCIPLES

Veralto's relations with all our customers and end-users and their officials, personnel and representatives must be conducted with the highest standards of integrity. Although this policy speaks specifically to providing customer trips, first please keep the following, basic principles in mind at all times:

- it is never OK to make a cash payment or cash gift to an employee or representative of any customer or business partner, unless allowed by the Veralto Gift and Entertainment Policy;
- it is never OK to give to employees or representatives of a government entity anything of value (we refer to direct and indirect government customers and government end-users as "Government Customers"), whether in cash or any other form, with the intent of obtaining, maintaining, or directing business; and
- with respect to direct and indirect customers and end-users who are not Government Customers, you may only offer gifts of nominal value. Veralto Opcos may set firm limits for specific guidance as to what is deemed nominal. Special gifts of more than nominal value may be given if local law allows and trade or industry custom, courtesy or other extraordinary circumstances require it and it is permissible according to the Veralto Gift and Entertainment Policy.

#### **CUSTOMER TRIPS**

One scenario in which we must be particularly vigilant about not providing an inappropriate payment or gift is when a Veralto Opco is asked to pay for or provide a trip for a customer or end-user's employees (e.g., training, site visit, product demonstration, education etc.). Veralto has adopted this policy to minimize the risk of an inappropriate gift in such a circumstance. No such trip, including training trips, are permitted unless the trip meets the following criteria and has been approved under the procedure set forth below. (For purposes of this policy, a trip may include transport and/or lodging and any related activities, and it applies with respect to all direct and indirect customers and end-users, not just Government Customers):

## Veralto

### Safeguarding the World's Most Vital Resources™

BONA FIDE TRIP CRITERIA. To be eligible for approval:

- A trip must be <u>directly related</u> to the promotion, demonstration or explanation of the company's products or services, obtaining VOC, or participating in bona fide scientific or technical advisory boards. The Opco must in good faith believe the trip is necessary for the promotion, demonstration, explanation, or development of the company's products or services. <u>The purpose of all</u> <u>customer trips must be documented in writing and filed for the purpose of later audit</u>.
- The Opco must completely plan and control the agenda for the trip (the customer or its employees may not plan the trip) and the agenda must be about the promotion, demonstration or explanation of the company's products or services. However, the customer may provide input on a preferred schedule as long as the customer preferences do not increase the cost of the trip (or the customer pays for the difference in cost).
- An Opco associate must accompany the customer's employees throughout the trip. However, it is not necessary to accompany the customer during the travel itself or during the free time that the customer has in the course of the schedule. The basic principle is that if the activity is something we are paying for, we should accompany the customer.
- Any activity that is not strictly part of the promotion, demonstration, explanation, or training must be relatively small in relation to the trip agenda, it must be planned and controlled by the Company, and must include Veralto or Opco associates reasonably connected to the promotion, demonstration, explanation, or training of the company's products or services; e.g., a study tour, a tour of a municipal facility in which our products are being used to demonstrate product use may be acceptable.
- Gratuitous or lavish activities, such as side trips to popular tourist destinations like Paris, Rome, Las Vegas, Disneyland, or shopping trips are not acceptable. Nor are unnecessarily lavish dinners or entertainment.
- The cost of a trip must be reasonable in relation to the agenda and purpose of the trip; <u>e.g.</u>, Opco will not pay for international airfare to transport the trip participants unless it is truly necessary to travel internationally to support the legitimate purposes of the trip. If Opco pays for domestic travel, it should be for economy fare unless there is a good, documented, reason to pay a more expensive fare.
- Trip participants must be selected by the customer the participant represents; if the Opco participates in the selection it must receive <u>written approval from</u>

# Veralto.

the participant's institution or, if business courtesy makes this troublesome, Opco must have some supporting documentation in the file that shows (i) it has provided notice of the trip to the institution the participant works for or (ii) the institution supports participation. (The point of this criterion is to be sure that the customer is aware of and/or approves of the trip for its employees, and to remove any suggestion that the trip is to obtain undue influence over purchasing decisions at the customer.)

- The Veralto Opco may not pay for family members or guests of the participants. If the participant wishes to have another person accompany him or her, the participant must pay for any difference in cost, e.g., a larger hotel room. It is, however, acceptable to pay for a meal of a spouse or guest at a dinner when at a group dinner with the participant.
- In the case of a Government Customer, if a trip participant himself or herself has the ability or authority to award any business to a Veralto Opco, Opco must obtain the written approval of either the Opco's General Counsel or the Veralto Chief Compliance Officer to permit participation.
- Opco business being conducted with the customer at the time the trip is arranged should be of a routine nature—no non-routine business should be pending between a Veralto Opco and the employees of the customer. See "SOME PRACTICAL COMMENTARY ADDED IN CONNECTION WITH FAQs" section of this Policy for additional detail on non-routine business.
- Opco will make no payments to any representative or employee of a customer—all trip or related payments (e.g., transport, lodging or activities) will be made by Opco to its own third party service providers. For example, the Opco will use the travel agency of its choice and will not permit the customer's employees to control or change the trip details.
- In rare circumstances the Opco may make cash payments to the representative or employee of a customer participating in the trip if the participant submits a receipt to Opco and Opco determines the amount to be reimbursed was minimal and reasonable under the circumstances.
- Exceptions to these criteria may be made by the president of the Opco after conferring with the Opco CFO <u>and</u> either the General Counsel of the Opco (if there is one) or Veralto Chief Compliance Officer

## Veralto

APPROVAL PROCEDURE FOR CUSTOMER TRIPS – OPCO DESIGN OR VERALTO PROCEDURE

Veralto Opcos must have a written approval procedure under which an appropriate manager (Approving Manager) must approve customer trips (for example, the CFO or someone delegated by the president or CFO). In the absence of a specific procedure developed by the Opco, the procedure should be as follows:

- 1. An associate from the Opco will complete and provide the attached <u>Customer</u> <u>Trip Approval Form</u> to the appropriate manager (the Approving Manager).
- 2. The Approving Manager will review the Customer Trip Approval Form, including the trip agenda, and if approved will sign and deliver a copy of the completed, signed form to the CFO for the Opco or to another person designated by the Opco president.
- 3. Upon review and approval by the Opco CFO or other Opco designate, the Opco CFO/designate will notify the Opco requesting associate of his or her authority to proceed or will deny the request.

Additional Requirements For Customer Trips

- 1. The Veralto Opco must ensure that all expenditures for the trip are accurately recorded in the books and records of the company per generally accepted accounting principles.
- 2. No payment on behalf the Opco related to the trip may be approved without adequate supporting documentation or made with the intention or understanding that any part of such payment is to be used for any purpose other than that described by the documents supporting the payment.
- 3. This policy applies to the use of corporate as well as personal funds or assets. It also applies with equal force to indirect contributions, payments, or gifts made through any medium, such as through consultants, advisors, suppliers, distributors, trading partners, customers, or other third parties.
- 4. The Opco must maintain internal controls sufficient to ensure that the trip transactions are recorded as necessary to permit preparation of financial statements in conformity with generally accepted accounting principles. Veralto Internal Audit will periodically review the trip records to audit the sufficiency of Opco's internal controls.
- 5. The Opco must maintain a complete and accurate record of any customer trip submitted for approval. The record will include:
  - Any documents or evidence of the bona fide purpose of or necessity for providing the trip



- The final agenda for the trip and any record of any subsequent deviations from that agenda.
- The budget proposal and all financial records regarding expenditures
- Documentation evidencing the customer's selection or approval of the participants
- The Customer Trip Approval Form completed with all required signatures and approvals or other Opco designed equivalent record.
- Any other documentation to demonstrate the need for and reasonableness of the trip or any exceptions that were made as permitted under this policy and guideline.

SOME PRACTICAL COMMENTARY ADDED IN CONNECTION WITH FAQS:

- This policy does not apply when customers pay their own expenses to visit our facilities.
- This policy does not prohibit a Veralto Opco associate from paying for a meal for a customer during a site visit or otherwise, so long as the prohibitions about lavishness are observed. But if the customer is a Government Customer, you should confirm in advance that paying for a meal is allowed because many government employees are prohibited from accepting anything of value, including meals.
- This policy does not prohibit entertaining a customer after a site visit, as long as the entertainment is "relatively small in relation to the Trip agenda" and is not "lavish." (See criteria 4 & 5 under Bona Fide Trip Criteria of this policy and related statements in the Veralto Gift and Entertainment Policy) Obviously, no entertainment should be provided that would embarrass the company if it were publicized. And again, when the visitors are from a Government Customer be absolutely certain that it is permissible to provide any entertainment even of nominal value.
- As a general rule, almost all countries have adopted prohibitions and requirements about doing business with Government Customers, you should check with your Opco General Counsel to ensure you understand and strictly follow all local laws as well as U.S. law regarding transactions with Government Customers. (See Veralto Code of Conduct generally and in particular sections regarding *Foreign Corrupt Practices Act* and *Government Contracting*).

# Veralto.

- "Non-routine" business depends upon industry commercial standards and the actual history between the Opco and the customer at issue, as well as the purpose of the trip in relation to the current business with that customer. For example, in some Opco businesses, business may be based on long-term contracts in which a major tender opportunity only occurs periodically. In those cases it may be "routine" to engage in a major tender intended to develop that long-term relationship with the customer; as such, it may be routine to engage in a series of activities intended to educate the customer about Opco's product or services. Even if Opco considers this activity to be routine for its market, regulatory authorities are likely to highly scrutinize a major tender, so the Opco must carefully adhere to the training and entertainment criteria and to engage senior leaders, Opco counsel or Veralto Legal in the decision-making and approval process.
- This policy does not prohibit Veralto associates from traveling to visit customers.

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By: Sylvia A. Stein Senior Vice President – General Counsel, Veralto Corporation October 1, 2023