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| <b>Title:</b> Anti-Corruption Policy |   |
| <b>Type:</b> Global Policy           | <b>Functional Owner:</b> Legal/Compliance |
| <b>Version #:</b> 2                  | <b>Effective Date:</b> 12/23/2025         |

## **Ralliant Anti-Corruption Policy**

### **Purpose**

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Ralliant Corporation (together with its operating companies, “Ralliant” or the “Company”) is committed to conducting business fairly, honorably, with integrity, and in compliance with the laws of every country in which it operates. Consistent with the values highlighted in our Code of Conduct (sometimes called the “Code”), we win business based on our innovation, products, and services.

Corruption can take many forms, but most often it occurs through bribery. Bribery is illegal in every country in which Ralliant conducts business. It can expose the Company to massive fines and other penalties, and it can lead to prison for employees. All Ralliant and operating company directors, officers, and employees must be familiar with and follow the requirements described in Ralliant’s Anti-Corruption Policy (the “Policy”). Agents, consultants, business partners, and any other persons or entities doing business on behalf of Ralliant (*i.e.*, third-party representatives) must also comply with this Policy.

Our Anti-Corruption Policy can be summarized in three points:

- ***We never pay bribes – in any amount – to get or keep business***
- ***We never give anything of value to government officials to influence their decision making on regulatory matters or any other issues***
- ***We record our transactions accurately and completely***

Any attempt to pay, authorize, or promise a bribe, kickback, or any other form of corrupt payment – in any amount – is strictly prohibited. It does not matter if the intended recipient of the bribe works in the public or private sector. It does not matter if the intended recipient conducts business in a country where paying bribes is a common practice, “necessary to get anything done,” or “engrained in the business culture.” It does not matter if “everyone else is doing it” or if we believe we can’t compete without it. No officer, director, or employee shall pay, authorize, or promise to give anything of value – whether directly or indirectly through a third party – in order to improperly influence any person or entity to act favorably towards Ralliant.

### **Scope**

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This Policy applies to all employees and contractors of Ralliant. This Policy supports the guidance provided in the Code, by providing more detail on this important topic, and does not replace anything described in the Code. This Policy also applies to any third-party representative acting on behalf of the Company, such as distributors, agents, brokers, consultants, or other business partners.

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## Policy

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### Bribery and Corruption: The Basics

Bribery has a range of definitions under various laws, but certain fundamental principles apply universally. A bribe is offering, promising, giving, demanding or accepting anything of value for the purpose of obtaining or retaining business, or influencing an outcome that is illegal, unethical, or a breach of trust.

Many anti-corruption laws around the world prohibit bribery, including the U.S. Foreign Corrupt Practices Act (the “FCPA”). The FCPA is a U.S. criminal law that prohibits offering to pay, paying, promising to pay, or authorizing the payment of money or anything of value to a government official in order to influence any act or decision of the government official in his or her official capacity or to secure any other improper advantage in order to obtain or retain business. Importantly, the FCPA – and most other anti-corruption laws globally – prohibit not only bribes made directly by employees, but also bribes made indirectly through third parties acting on behalf of the Company. The FCPA can reach beyond activities in the U.S. to any place Ralliant or its third-party representatives operate.

In addition to the FCPA, we must be mindful of anti-bribery/anti-corruption laws in numerous other countries in which Ralliant operates. For example, the U.K. Bribery Act of 2010 (“UKBA”) is broader in scope than the FCPA insofar as Section 1 of the Act makes it an offense for a person to offer, promise, or give a financial or other advantage to any person – and not just a foreign public official – to reward or to bring about improper performance. Likewise, China, India, and other countries have recently implemented, updated, or increased enforcement of their respective anti-bribery and anti-corruption laws and regulations.

Acts of bribery commonly involve **government officials**. Under most anti-corruption laws, and for purposes of this Policy, government officials are defined broadly, and includes but is not limited to the following:

- Officers or employees of any local, provincial or national government (e.g., members of Parliament, police officers, firefighters, members of the military, tax authorities, permit issuers, customs inspectors)
- Directors, officers, representatives, agents, or employees of any state-owned or controlled business or company (e.g., government-funded hospitals; universities; water, electricity, telecommunication utilities)
- Officers or employees of a public international organization (e.g., United Nations, International Olympic Committee, International Red Cross, World Bank)
- Individuals acting in any official capacity or on behalf of any government or public international organization (e.g., an official advisor or consultant to a government)
- Officers or employees of a political party
- Candidates for political office

As noted above, any payment that cannot be made directly to an individual under this Policy can also not be made indirectly, such as to a close relative, through a friend, via the individual's business, through a donation or through some other intermediary.

Bribes can take many different shapes and forms, and they typically involve a “quid pro quo” – that is, the bribe will be offered or paid in exchange for some benefit. Bribes can be made by using **anything of value**, including:

- Cash, cash equivalents (e.g., gift cards), or loans
- Payments for travel or entertainment
- Favors, including offers of employment or internships
- Gifts (e.g., perfume, jewelry, use of club memberships)
- Donations to a charity affiliated with or sponsored by a government official
- Political contributions

There are two common types of bribery. The first involves procurement-type bribery – giving something of value to a decision maker at a customer to influence his or her decision to buy or specify the products of a Ralliant company. This type of bribery can involve government contracts or orders or commercial contracts or orders with government-owned or controlled entities, which is explicitly prohibited by the FCPA. Procurement bribery can also involve similar payments to secure or maintain business in a purely private, commercial setting. Such commercial bribery is also strictly prohibited.

Examples of procurement bribery include:

- Paying a kickback to a purchasing agent or procurement officer so that the agent chooses to buy or specify the bribe payer's products instead of a competitor's products
- Providing anything of value to an executive or officer of a business partner in order to cause that business partner to conduct business with the bribe payer
- Paying a third party in order to unlawfully obtain a recommendation or referral for the Company

The second type of bribery involves providing something of value to a government official to influence his or her decision-making in a regulatory or purely governmental context, such as in obtaining a permit or license or resolving a regulatory dispute. This is also strictly prohibited. Some examples of improper influence of a government official include:

- A government official would not act if you did not provide something of value, and you offer something of value to increase the chances that the government official will take such action
- The government official has a choice to act or not and their decision to do so is influenced by receiving something of value

Some examples of improper business advantage include when a government official:

- Overlooks a violation or tolerates non-compliance with applicable laws

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- Does not perform a task that should otherwise be performed (e.g., does not conduct a required inspection prior to issuing a permit)
- Reduces customs duties
- Grants a favorable tax treatment

This Policy cannot cover every situation or provide information on every law that may be applicable where Ralliant conducts business. If you are ever uncertain, feel uncomfortable about, or question the ethics of any situation or request, you should seek further guidance from the Company. Information on who to contact for additional guidance, as well as other available resources, can be found in the *Resources and Contact Information* section of this Policy.

### **Limited Exceptions: Certain Business Courtesies, Personal Safety**

A “business courtesy” generally refers to something of value that is provided, in good faith and without improper intent, to business partners, customers, or potential business partners/customers as a means of developing a legitimate relationship with them. Business courtesies are typically offered in connection with and must be directly related to legitimate marketing/sales activities or the promotion, demonstration, or explanation of products and services, and may include meals, entertainment, discounts on products and services not readily available to the general public, payment of travel expenses, personal favors, and token gifts.

Company employees and those acting on our behalf must take care to ensure that business courtesies do not constitute – or would not be perceived by others to constitute – a corrupt payment to the recipient. Only legitimate and reasonable business courtesies may be provided by Ralliant to its customers, business partners and other stakeholders. A good way to judge whether a contemplated business courtesy is appropriate is to ask yourself whether it would appear to an objective person that the courtesy was intended to influence the recipient. Imagine a news story reporting on the gift. Was the value significant to the recipient? Did the Company have business pending before the recipient? Did the Company have some sort of pending regulatory approval before the recipient?

Reasonable business courtesies are permitted but **only pursuant to prior review and approval in writing**. Please review the referenced policies regarding the provision of business courtesies and follow the guidelines set forth therein. Please also note that more restrictive procedures and requirements are in place for the provision of business courtesies to government officials and to private persons in China.

*Approval for non-cash gifts and hospitality: Ralliant’s Gift & Entertainment Policy*

*Approval for travel and lodging: Ralliant’s Customer Trips & Entertainment Policy*

While employees should review the above policies for additional details, as a general matter, permissible business courtesies must adhere to the following requirements:

- be of modest value
- be directly related to a legitimate business purpose
- be lawful under all applicable laws (including local law)
- would not embarrass Ralliant if disclosed publicly

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- does not create the appearance that the giver is entitled to preferential treatment
- would not influence, or appear to influence, the recipient's ability to conduct his or her official duties objectively and independently, to act in the best interest of his or her company, agency or entity, or to prevent the recipient from awarding business to one of the provider's competitors

The following gifts, meals, entertainment or business courtesies are **never** permitted:

- gifts or benefits given in the expectation of, or as a reward for, the provision of business or favorable official action
- gifts or loans of cash or cash equivalents (including, but not limited to, shopping cards or gift cards)
- lavish meals or entertainment
- "adult" or other inappropriate entertainment
- meals or entertainment given specifically to influence official decision making, to obtain or retain business, or to reward the award of prior business
- gifts that are requested by the recipient

For additional details and information, please see Ralliant's Gift & Entertainment Policy and Ralliant's Customer Trips & Entertainment Policy.

**Health and Safety Exception:** An important exception exists under this Policy for circumstances in which the health and physical safety of Ralliant employees are placed at risk. If an employee ever finds him/herself in a situation that presents an immediate threat to his/her health or personal safety – and a payment is being demanded to remove that threat – then the employee should make the payment, immediately get to a safe location, and report the situation to the Legal / Compliance Department.

Some examples include, but are not limited to, the following situations:

- Employee is stopped by police, military, or paramilitary personnel, who demand payment to allow safe passage
- Employee is threatened with arrest/imprisonment for a routine traffic stop, Visa issue, or other minor violation unless a payment is made

Once in a safe location, the employee must contact the Legal / Compliance Department, which will document the amount of the payment, the recipient of the payment, and a detailed explanation of the reason for the payment.

### **Third-Party Representatives**

Ralliant can be found responsible for bribes or kickbacks made by **third-party representatives** in connection with Ralliant or operating company business.

The definition of third-party representative is broad, and could include among other things agents, brokers, distributors, professionals (lawyers/accountants), franchisees, consultants, and joint-venture partners. While use of third parties can help us reach our goals, we need to be aware that these arrangements can potentially present significant risks because the Company cannot as easily

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control the actions taken by these third parties on the Company's behalf. Accordingly, special care and due diligence must be exercised when retaining and when working with third parties.

Before any Ralliant company hires or enters into a contract or business relationship with any third-party representative to perform work that (i) may involve transacting business or otherwise interacting with government officials, or (ii) may involve selling Ralliant products or services to others, Ralliant requires that appropriate, risk-based due diligence be conducted, and proper authorization be obtained prior to commencing the relationship with the third party.

Ralliant's Third-Party Diligence ("3PD") program establishes guidelines and due diligence procedures for on-boarding and monitoring third parties. Generally, however, the Company requires that:

- Third parties are selected solely on the basis of merit
- A third party may not be retained to do things that are prohibited by this Policy or the Code
- No oral agreements or arrangements are to be made with any third party
- All agreements or contracts with a third party shall contain language prohibiting the third party from violating any laws, including specifically the FCPA and other applicable anti-corruption laws
- Commissions or other compensation paid to third parties must be in amounts that are customary and reasonable in relation to the services provided
- Commissions, expenses, and other payments must be properly and completely reflected in Ralliant's records, books of account, and financial statements
- No payments may be made in cash, to other third persons, or to bank accounts that are not in the third-party representative's name
- Arrangements with third parties will be reviewed regularly to ensure that they are in compliance with this Policy
- Files will be created and maintained documenting the due diligence conducted on each third-party

Please see the latest version of the 3PD program guidance for additional details and information.

### **Accurate Books and Records/Internal Controls**

The FCPA and other laws impose accounting and record-keeping requirements intended to ensure that companies maintain accurate books and records, as well as appropriate internal controls. Accordingly, and consistent with our accounting policies, all transactions must be recorded accurately, timely, and with sufficient detail to identify the actual purpose for each payment. Ralliant strictly prohibits any "off-the books" accounts or payments, or making any false, misleading, or incomplete entries in the books and records in an attempt to obscure or hide the actual purpose of a payment. It is never permissible to mischaracterize an improper payment as a proper one, or to bury an improper payment in a larger line item of proper payments. These prohibitions apply regardless of the amount of the payment.

### **Mergers, Acquisitions and Joint Ventures**

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Any agreement by a Ralliant company to merge, acquire, or enter into a joint venture with a non-Ralliant entity requires advance approval from the Ralliant Legal Department. In situations where Ralliant or a subsidiary will merge with, acquire a majority stake or operational control in, or acquire all or substantially all of the assets of a non-Ralliant entity, Ralliant must conduct appropriate anti-corruption due diligence to guard against legal, financial, and reputational risks related to potential corruption issues arising from those transactions.

## **Resources and Contact Information**

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### **Advice and Questions**

If you have questions about this Policy, please consult a member of your OpCo or Ralliant Legal / Compliance Department. It is always best to reach out for support as soon as you realize you have questions or concerns.

**Speak Up!** if you have questions about the right thing to do, or if you see something that doesn't seem right. Talk to your manager or any of these other resources:

1. Another manager or supervisor
2. The Human Resources, Legal or Compliance team at your OpCo or Ralliant
3. Ralliant Internal Audit staff
4. Other available reporting channels found at the Speak Up! Hotline.

Speak Up! is a resource you can reach online or via phone to raise a concern 24 hours a day, 7 days a week. Speak Up! is available at [www.ralliant.ethicspoint.com](http://www.ralliant.ethicspoint.com). Dedicated phone staff speak over 20 languages, and you may report anonymously, unless prohibited by local law. Concerns raised to Speak Up! will be handled promptly by the Global team, which includes Ralliant and OpCo Legal/Compliance, and assigned investigator(s), along with HR where appropriate. The existence and the details of an internal report and the details of any related investigation will be kept confidential and shared only with those authorized to access the concern.

Although Speak Up! is always available, there may be some issues that are best addressed with your manager or Human Resources first, such as performance management and employee relations matters.

### **Discipline for Non-Compliance**

Failure to comply with this Policy may lead to discipline, up to and including termination.