

## ANTI-CORRUPTION POLICY

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### INTRODUCTION

This Anti-Corruption Policy (“Policy”) applies to all employees, officers and directors (collectively, “Solution Makers”) of SPX FLOW, Inc. and its subsidiaries worldwide (collectively, “SPX FLOW”). Those that transact business with or on behalf of SPX FLOW, including suppliers and channel partners, are also expected to comply with this Policy.

Simply put, corruption is against SPX FLOW’s values and has no place at our company. In the case of bribery, it is also illegal and may subject both SPX FLOW and the individual who participated in the act to fines, penalties, and even imprisonment, not to mention serious reputational damage. SPX FLOW takes issues of corruption seriously and is committed to maintaining the highest standards of ethics and integrity. This Policy serves to help you comply with the many anti-bribery and corruption laws that apply to SPX FLOW, including the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act. In transacting business for SPX FLOW, Solution Makers are prohibited from seeking to influence others, whether directly or indirectly, by offering bribes. Likewise, no Solution Maker may request or receive a bribe.

Our culture of ethics and integrity means that all Solution Makers are expected to comply with applicable laws in the jurisdictions in which SPX FLOW operates. This includes avoiding any activity that creates even an appearance of impropriety, including conflicts of interests.

Violation of this Policy is a serious matter and may have serious consequences for SPX FLOW – and for you. Any Solution Maker who violates the Policy may be subject to disciplinary action, including termination of employment or, in the case of a channel partner or supplier, termination of your business relationship with SPX FLOW. Corruption issues frequently are not black and white, and no policy can anticipate every possible situation that may arise. If you are ever confronted with a situation in which you have any doubt or uncertainty about what the right course of action may be, seek immediate guidance.

### TYPES OF PROHIBITED CORRUPTION

#### I. Non-compliance with Applicable Laws

All Solution Makers are required to comply with the letter and spirit of applicable laws in every location in which SPX FLOW transacts business. This extends beyond anti-bribery laws and applies to laws relating to fraud, data privacy, employee health and safety, forced labor, antitrust/competition, and environmental rules and regulations.

#### II. Bribery

At SPX FLOW, bribery involving Solution Makers is never permitted. A **bribe** is the offering, giving, or receiving of *anything of value* with the intention to secure or provide an unwarranted business advantage or improper benefit. SPX FLOW prohibits bribes even if: (i) the bribe does not succeed; or (ii) the amount of the bribe is small. “Anything of value” may include, but is not limited:

- Cash and cash equivalents (gift cards)
- Stock and other financial interests
- Transfer of property (real, personal, and intangible)
- Assumption or forgiveness of debt
- Gifts, meals, entertainment, and travel that do not have a legitimate business purpose or are disproportionate to the occasion
- Charitable contributions, especially if made at the request of a third party
- Political contributions
- Job offers, especially when it involves a government official or their relative

SPX FLOW and its Solution Makers cannot avoid liability for bribery by using a third party, sometimes referred to as an intermediary, to give or receive a bribe on its behalf. Potential third parties include, but are not limited to, agents, distributors, consultants, and subcontractors. SPX FLOW prohibits bribery by its third party business partners and requires that they abide by the terms of this Policy.

Bribery laws and regulations are particularly strict when dealing with a government official. A **government official** is any:

- individual elected or appointed to a government entity
- employee or official of a government
- employee or official of a company wholly or partially owned by a government (e.g., state-owned entity)
- candidate for political office
- political party or official of a political party
- an employee or officer of a public international organization (e.g, World Bank or United Nations)
- individual acting in an official capacity for or on behalf of a government entity

All Solution Makers are expected to exercise care when engaging in business activities with any government official.

### **III. Facilitation Payments**

A **facilitation payment**, sometimes referred to as a “grease payment”, is a payment that is provided to a government entity to speed up routine governmental transaction to which the payor is already entitled. A facilitation payment differs from bribery in that it does not necessarily result in the receipt of an improper benefit. Examples include a payment to speed up the processing of paperwork or an additional fee to jump to the front of the line for a utility connection. While facilitation payments may be legal in certain countries, SPX FLOW nevertheless prohibits Solutions Makers from making facilitation payments when transacting business on its behalf.

### **IV. Misrepresenting Financial Records or Reports**

Solutions Makers must ensure that SPX FLOW maintains books, records, and reports that accurately and fairly reflect the business transactions of SPX FLOW. Solutions Makers are expected to adhere to established internal controls and report any financial records or reports that are inaccurate, false, or misleading.

### **V. Undisclosed Conflicts of Interest**

A **conflict of interest** occurs when your personal interests, activities, investments, or association *influence or appear to influence* your responsibilities as an SPX FLOW Solution Maker. A conflict of interest may arise when

one takes actions or has interests that may make it difficult to perform their work objective and effectively. Examples include:

- holding an undisclosed personal or family interest or investment in a supplier, customer, or competitor of SPX FLOW
- managing, supervising, or hiring a family member
- using SPX FLOW confidential or proprietary information for personal gain
- competing directly with SPX FLOW

Often times, conflicts of interest can be mitigated by implementing appropriately tailored safeguards. Solutions Makers are expected to disclose conflicts of interest to Human Resources, Legal Department, or SPX FLOW's Chief Compliance Officer.

## CONSEQUENCES OF CORRUPTION

In most countries in which SPX FLOW operates, the types of corruption set forth in this policy are illegal. Consequences for businesses and individuals that engage in corruption:

- **Criminal Liability:** Individuals convicted of corruption, such as bribery, may be imprisoned and subject to significant fines. SPX FLOW may also face criminal liability when bribes are offered or accepted on its behalf.
- **Civil Liability:** SPX FLOW may be required to pay damages for any harm caused by a corrupt act performed on its behalf.
- **Negative Impact on SPX FLOW's Business and Operations:**
  - **Damage to Reputation:** Corruption can irreparably damage the reputation of a business. This is true even for allegations of corruption. As businesses increasingly focus on maintaining Environmental, Social, and Governance (ESG) conscientious operations, companies that have a reputation for corruption may be excluded from certain commercial transactions. Likewise, individuals that have a reputation for corruption may be denied employment opportunities.
  - **Operating Bans:** Companies involved in corruption can be barred from both public and private business opportunities. In the European Union, for example, companies that are convicted of corruption are excluded from public sector contracts.
  - **Termination of Contracts and Damages:** SPX FLOW's customers frequently request that SPX FLOW maintain certain ethical standards. Violating such standards may allow for cancellation of the contract or subject SPX FLOW to damages. Moreover, contracts obtained via corruption may be deemed unenforceable.
  - **Lower Employee Morale:** Corruption undermines employee confidence in management and harms corporate culture. Nobody wants to be associated with a company that is known for corruption.

## HOW TO AVOID CORRUPTION

- Contact the SPX FLOW Legal Department before offering or receiving gifts or entertainment that may be viewed as lavish or extravagant according to local standards
- Follow SPX FLOW's **Channel Partner Policy** when engaging sales agents and distributors
- Never participate in fraudulent, misleading, or dishonest activities
- Disclose possible conflicts of interest

- Never conceal any corrupt or potentially corrupt activity
- Never turn a blind eye to any activity that you believe may be corrupt
- Be aware of, and report, the following red flags:
  - o Business partner has a reputation for paying bribes
  - o Business partner recommends that SPX FLOW engage a specific distributor, supplier, consultant, or contractor
  - o Business partner states that, because of its close relationship with a particular customer or government official, only companies that partner with it will be able to win a contract
  - o Business partner requests, without reasonable explanation, fees that are much higher than the market rate for comparable work
  - o Business partner proposes a large contingency fee if a contract is awarded
  - o Business partner requests that payments be made to another entity or asks for unusual financial arrangements
  - o Business partner requests payment in cash
  - o Business partner requests that a particular business transaction be kept secret from his or her employer
  - o Business partner refuses to sign SPX FLOW's ethics certificate
  - o Business partner lacks suitable facilities or qualified staff to perform its obligations

### **REPORTING CORRUPTION AND GETTING HELP**

SPX FLOW takes many precautions to prevent situations that may present a risk of corruption for Solution Makers. That said, Solution Makers may nevertheless experience circumstances where they may be confronted with corruption. SPX FLOW will always support Solution Makers who handle such situations in good faith with the intention to abide by this Policy and SPX FLOW's Code of Business Conduct.

If you receive a request for a bribe, the following actions are recommended:

- Politely decline the request. If the person making the request persists, let them know that SPX FLOW has a zero-tolerance policy on bribes and that they are illegal under laws that govern SPX FLOW's business.
- Immediately report the incident to Human Resources, the Legal Department, and/or the Chief Compliance Officer.

If you suspect that a Solution Maker may be involved in corrupt conduct, please notify SPX FLOW's Human Resources Department, Legal Department, and/or Chief Compliance Officer. Solution Makers who report concerns will be protected by SPX FLOW's Whistleblower Policy, which prohibits any form of retaliation against those who submit reports in good faith. Anonymous reporting may be made through SPX FLOW's Compliance Helpline, reachable via:

- Toll-Free Phone: 1-866-ETHICSP
- Online: [www.ethicspoint.com](http://www.ethicspoint.com)
- Mail: SPX FLOW Compliance, 13320 Ballantyne Corporate Place, Charlotte, NC, 28277