



All IDEX Employees, Officers and Directors:

Consistent high standards of conduct are essential to meeting and exceeding the expectations of our customers, suppliers, employees, and shareholders; to complying with applicable laws throughout the world; and to the continued growth, success, and excellent reputation of IDEX. It is the responsibility of every IDEX employee, officer and director to ensure that these standards are a reality by making the right choices every day.

The foundation of the IDEX Code of Business Conduct and Ethics is that we act in every instance with honesty, fairness and integrity. No code can be written to cover every potential situation. Accordingly, the IDEX Code of Business Conduct and Ethics is purposely written in broad general terms. In the final analysis, each individual must exercise his or her own best judgment to determine what is required to comply with high ethical standards.

IDEX is very serious about compliance with its Code of Business Conduct and Ethics. Anyone who disregards the Code in any way will not only be subject to dismissal, but may also face civil or criminal penalties. All of us must always strive to do what is right, not just what is required to comply with the laws of the countries in which IDEX operates and does business.

You are expected to carefully read and fully understand and comply with both the letter and the spirit of the Code. IDEX is an international organization, and its Code of Business Conduct and Ethics applies to all of its employees, officers and directors worldwide.

If you ever have any question about the IDEX Code of Business Conduct and Ethics, or if there is any incident to be reported, you should follow the procedures described in the Code.

*Andrew K. Silvanal*

Chairman of the Board, President, and  
Chief Executive Officer



## **IDEX CODE OF BUSINESS CONDUCT AND ETHICS**

### **BACKGROUND**

This Code applies to all employees, officers and directors of IDEX Corporation and each of its subsidiaries, including its principal executive officer, principal financial officer, principal accounting officer or controller and other employees performing similar functions and all non-employee officers and directors. This Code is a guide to help you live up to the high ethical standards that IDEX expects of its employees, officers and directors. This Code requires compliance with the laws, rules and regulations of every country in which IDEX operates and does business. However, IDEX's standards go beyond the legal minimum and require a higher level of conduct. You are expected not only to comply with laws, rules and regulations, but also to act in every respect with honesty, fairness and integrity. This Code should be regarded as more than just a set of rules. It is a statement of beliefs that should guide your actions in all situations. You can resolve most ethical questions simply by taking time to consider whether you are acting honestly and fairly. We firmly believe that compliance with high standards of business conduct and ethics is in the best long-term interest of IDEX, its shareholders, customers and suppliers, and each of its employees, officers and directors.

### **ETHICAL AND LEGAL RESPONSIBILITIES**

#### **Affirmative Responsibilities**

Each IDEX employee, officer and director has an individual responsibility to deal at the highest ethical levels with customers and suppliers, fellow employees, officers and directors, and the general public. All employees, officers and directors are expected to do more than merely avoid illegal and unethical conduct. They must also take the initiative and assume affirmative responsibility for quality, honesty, fairness and compliance with all applicable laws.

IDEX employees, officers and directors are expected to raise ethical concerns and report any actual or suspected illegal or unethical conduct in accordance with the procedures described below under the caption "REPORTING PROCEDURES." Honesty also requires that employees, officers and directors refuse to participate either actively or passively in any cover-up of illegal or unethical conduct. "Looking the other way" on potential legal and ethical violations is in direct contradiction to IDEX's commitment to honesty and integrity and will not be tolerated.

#### **Legal Requirements**

Adherence to legal requirements must govern the business decisions and actions of every IDEX employee, officer and director. You should make every effort to ensure that you



and IDEX are in compliance with all legal requirements applicable to your areas of responsibility. Any regulatory or governmental inquiry or action should be immediately communicated to the IDEX General Counsel or Deputy General Counsel in accordance with the IDEX Policy & Procedure on Notification of Legal Matters (LGL-WW-20-100). In acting to ensure that you and IDEX are in compliance with legal requirements, your actions should always comply with both the spirit and the letter of the law. References in this Code to “legal”, “the law”, “law” or “laws” include every kind of law, rule, regulation, order, code, ordinance, statute and other legal or regulatory requirement.

### **Conflicts of Interest**

IDEX employees, officers and directors and their spouses and other close family members are expected to avoid outside interests or activities that could be advanced at the expense of IDEX’s interests. Such involvement may divide loyalty between IDEX and the outside interest or activity and thus create a potential conflict of interest. An employee, officer or director entering into a business or personal arrangement with a competitor, supplier or customer is prohibited. An employee, officer or director is also prohibited from working for and providing advice or consulting services to a competitor, supplier or customer. In addition, employees, officers and directors should not run “side businesses” which compete with, sell to, or buy from IDEX and should avoid any financial investments in competitors, suppliers or customers other than nominal investments in public companies. The only exception is arrangements, relationships and interests that non-employee officers and directors may have with competitors, suppliers and customers that were disclosed to IDEX prior to their appointment as an officer or director. Any other exceptions to these prohibitions require prior approval by IDEX’s General Counsel or Deputy General Counsel and by a senior executive of each affected IDEX group or segment who has no direct or indirect personal interest or involvement in the arrangement or relationship. In addition, independent of this Code, transactions may require approval of the Audit Committee of IDEX’s Board of Directors pursuant to IDEX’s Related Person Transaction Policy (LGL-WW-10-110).

### **Competition**

IDEX’s policy is to comply with competition laws and to use only ethical and proper methods to market, distribute and sell IDEX’s products and services. The purpose of competition laws, also known as antitrust, monopoly or fair trade laws, is to protect the competitive market system. IDEX employees, officers and directors may not engage in or support illegal activities that improperly restrain trade or that constitute unfair business practices or predatory economic conduct. Competition laws are complex and the penalties for violations—for both companies and individuals—can be severe. Many country’s competition laws are different, however, the types of conduct that are prohibited are very similar. To minimize the risk of violating completion laws, an IDEX employee, officer or director should:

- Never fix or agree with a competitor to fix prices or terms or conditions of sale for competing products or services;



- Never allocate or agree with a competitor to allocate customers or regions for sales opportunities;
- Never exchange nonpublic information with a competitor, including pricing, sales, marketing cost, R&D or supply information;
- Never require a distributor to sell a product for a minimum price; and
- Never require a customer to purchase one product as a condition to its ability to buy another product.

To avoid even the appearance of improper action, IDEX absolutely prohibits consultations with competitors regarding prices, customers or territories

Improper agreements can be written, oral or even “handshake” agreements. In addition, improper agreements are sometimes inferred merely from the actions of competitors, including conversations with competitors. As a result, no IDEX employee, officer or director should ever discuss with competitors the activities described above or other matters that might be construed to improperly restrict or limit competition.

Advertising must always be in good taste, and all claims made in advertisements must be fully supportable. All IDEX customers are to be treated fairly and evenhandedly, and no preferential trade terms or other treatment may be extended to any customer in violation of any law.

### **Trade Compliance**

It is IDEX’s policy to comply with all applicable export and import laws and insure proper documentation for all shipments and deliveries. Trade regulation is complex and employees are encouraged to consult with the IDEX Compliance Department whenever any export or import issues or questions may arise. IDEX employees, officers and directors should be aware of the following:

- Many countries have prohibitions against conducting business with certain individuals, groups or organizations that have been designated as terrorists (or supportive of terrorism), drug traffickers, etc.
- Many countries have prohibitions against transactions with “end-users” who may be involved in the development of biological or chemical weapons, ballistic missiles or certain nuclear activities;
- Some products, software, technology or technical data may require an export license to be shipped, transferred or disclosed to a customer. The transfer or disclosure of technical data to foreign nationals may be considered an unlawful export;
- All goods are required to be classified and valued appropriately in order to ensure that proper duty is paid.

Government organizations may often request trade information from IDEX. It is IDEX policy to cooperate with legitimate requests for information through appropriate channels. All routine requests for trade information by any government agency should be



reported to the IDEX Compliance Department. In addition, any impromptu requests to visit an IDEX facility should be immediately reported to the IDEX Compliance Department or the IDEX General Counsel or Deputy General Counsel.

### **Payments to Third Parties**

Payments made by IDEX to third parties should only be for products or services properly provided to IDEX. No IDEX employee, officer or director may make any direct or indirect payment in the nature of a bribe, payoff or kickback to secure or maintain business or for any other purpose to any government official or employee or any personnel of a customer, supplier or competitor. In order to avoid even the appearance of improper payments, no payments are to be made by IDEX in cash, other than properly documented petty cash disbursements. No corporate checks are to be written to “cash”, “bearer” or third party designees of the person entitled to payment. Cash payments may never be made to any government official, employee or agency or any personnel of a customer, supplier or competitor.

Payments to employees, agents, consultants or others outside their country of residence are prohibited if they would violate the laws of that country. Such payments are allowed only when (a) the recipient represents in writing there is no such violation; (b) IDEX receives a written opinion of counsel to that effect; and (c) the payment is approved by IDEX’s General Counsel or Deputy General Counsel.

### **Prohibition of Corrupt Practices**

While countries where IDEX does business have legal requirements prohibiting improper payments to government officials, IDEX takes that a step further by prohibiting improper payments to anyone. IDEX employees, officers and directors are prohibited from directly or indirectly paying anything of value to anyone in order to:

- Win or retain business or to improperly influence the act or decision of anyone
- Gain an improper advantage; or
- Illegally influence the action of any individual, customer, company or company representative.

In addition, IDEX employees, officers and directors must not provide gifts, entertainment or other items that go beyond IDEX’s gift and entertainment policies or applicable local law. This includes, but is not limited to, cash payments, excessive meals and entertainment, travel expenditures, job offers and charitable and political contributions.

IDEX and its business units often use third parties, such as agents, distributors, dealers, etc., to enter markets and meet certain obligations, IDEX employees who are responsible for these third party relationships are required to:



- Perform adequate due diligence on such third parties to ensure they are reputable and qualified;
- Verify that IDEX is paying no more than fair market value for the products and services provided;
- Document such third party relationships in writing and ensure all transactions are transparent; and
- Ensure that such third parties are not being engaged to conduct activities on behalf of IDEX that IDEX employees would be prohibited from performing directly.

Facilitation payments (i.e., payments made to government officials or employees to expedite a routine government action) are strictly prohibited, unless the person making the payment feels his or her or another person's life, safety or liberty will be at risk if the payment is not made. For more information on facilitation payments see the IDEX Anti-Corruption Policy (LGL-WW-10-100) or contact the IDEX Compliance Department or IDEX's General Counsel or Deputy General Counsel.

### **Gifts and Entertainment**

IDEX believes that business decisions by its customers should be made solely on the basis of IDEX's quality, service, price and other competitive factors. Gifts and entertainment to customers and suppliers and their employees must be of nominal value and may only be used to create general goodwill with IDEX customers and suppliers. In the case of gifts, nominal value is any gift under USD50 or its foreign currency equivalent. If they go beyond that and make the customer or supplier feel obligated to offer any special consideration to IDEX, they are unacceptable. IDEX's policy is to avoid even the appearance of favoritism based on gifts and entertainment.

Employees, officers and directors should exercise good judgment and moderation and should only offer gifts and entertainment to customers and suppliers to the extent they are in accordance with reasonable customs in the marketplace. However, no gifts or entertainment whatsoever should be offered to government officials or employees. Many government agencies around the world have strict rules which prohibit officials and employees from accepting even the smallest business courtesies. These rules may also apply to government prime contractors and subcontractors and government-owned companies with whom IDEX does business. For more information please refer to your Unit's Travel and Expense policy or contact the IDEX Compliance Department.

### **Receipt of Gifts**

Gifts by competitors, suppliers and customers to IDEX employees, officers and directors raise the appearance, if not the reality, of dishonest or unfair dealings. It is IDEX's policy that all business decisions be made impartially and fairly, and not on the basis of gratuities provided to employees, officers or directors. Therefore, no employee, officer or director, and no spouse or other close family member of an employee, officer or



director, may solicit or receive favors, gifts, money, loans or other benefits (including goods, services or discounts) from any competitor, supplier or customer. The only exception to this prohibition is for unsolicited casual favors or entertainment and non-monetary gifts of nominal value which are customarily offered to others having a similar relationship with the competitor, supplier or customer. IDEX employees, officers and directors should exercise good judgment in deciding whether to accept a casual favor or entertainment or a gift from a competitor, supplier or customer, and, if there is any doubt, should decline the offer.

### **Use of Company Resources; Corporate Opportunities**

Each IDEX employee, officer and director has a responsibility to use company resources, including time, materials, equipment and confidential and proprietary information, for company business purposes only and not for personal benefit. Any such personal use, without proper permission, amounts to theft of company property. IDEX property, such as shop equipment, software, tools, computers, office supplies and facilities, are not to be used by its employees, officers and directors for other than company purposes, unless otherwise authorized by IDEX. Any exceptions to these prohibitions require prior approval by IDEX's General Counsel or Deputy General Counsel and by a senior executive of the affected IDEX Unit, Group or Segment who has no direct or indirect personal interest or involvement in the arrangement or relationship.

Licensed computer software may be copied or used only in strict compliance with the applicable licenses granted to IDEX.

It is expected that all requests for reimbursements from IDEX by employees, officers and directors, whether for medical claims, travel expenses or other business-related items, will be legitimate, properly documented and in accordance with applicable IDEX policy.

Employees, officers and directors receive IDEX's business and technical information and know-how in trust and are expected to maintain such information in confidence and not to disclose or use it other than as authorized by IDEX. This information includes, for example, names of customers, suppliers and employees, manufacturing processes and equipment, plant layout, engineering drawings, product development plans, information systems, business plans, financial and marketing information and all documents and data which relate to such items. IDEX's business and technical information and know-how are important assets of IDEX and form a significant part of its value. Employees, officers and directors are expected to actively protect these assets. Persons who use any of these assets for their own personal gain or improperly give or sell these assets to other persons will be subject to discipline, up to and including discharge, and may result in criminal charges.

### **Use of Electronic Technology Resources**

IDEX's electronic technical resources are intended to enable its employees to quickly and efficiently access and exchange information throughout IDEX and around the world.



These resources include desktop and portable computer systems, personal digital assistants, fax machines, Internet and World Wide Web (Web) access, voice mail, electronic mail (e-mail), electronic bulletin boards, and intranet, as well as the use of any company-paid accounts, subscriptions, or other electronic technical resources.

These electronic technical resources are provided only for use by employees, officers and directors in the pursuit of company business. The only exception is for non-work related use is occasional personal use for non-prohibited purposes. Nevertheless, with certain specific legally required exceptions, employees, officers and directors have no right of privacy as to any information or file transmitted or stored on or through IDEX's electronic technical resources. Employees, officers and directors are responsible for ensuring that they use IDEX's electronic technical resources in an effective, ethical, and legal manner. To that end, IDEX has installed systems to track their usage.

IDEX's electronic technical resources may not be used for personal gain, the advancement of individual views, or the solicitation of non-company business or activities. Personal use of IDEX's electronic technical resources must not interfere with an employee's own productivity, the productivity of any other employee, or the operation or security of IDEX's electronic technical resources.

Sending, saving, or viewing illegal or offensive material using IDEX's electronic technical resources is prohibited. Messages stored or transmitted must not contain content that is illegal or that may reasonably be considered offensive to another employee. Illegal and offensive material includes, but is not limited to, pornographic pictures and video, sexual comments, jokes or images, racial slurs, gender-specific comments, or any comments or images that would offend someone on the basis of a person's race, color, creed, sex, age, national origin, or physical or mental disability. Any use of IDEX's electronic technical resources to harass or discriminate or for other prohibited purposes is strictly forbidden, and will be subject to discipline, up to and including discharge, and may result in criminal charges.

### **Political Contributions**

All IDEX employees, officers and directors must comply with laws that apply to the use of company resources for political purposes. United States law and the law of many other countries generally prohibit the use of corporate resources to support or oppose candidates or political committees. IDEX does not allow political campaign or partisan political activities at any IDEX workplace or facility, and does not permit the use of IDEX resources, including computers, telephones, e-mail, or employee work time for political campaigning, fundraising, or partisan political activities.

IDEX employees, officers and directors have the right to participate individually in the political process, and to make voluntary contributions of their non-working time and personal resources to support candidates and political parties of their choice. IDEX encourages involvement by its employees, officers and directors in the political process, but these activities must not in any way suggest IDEX participation or support for a



particular political party, government official, candidate for office or issue and must not in any way use any IDEX resources.

### **Charitable Contributions**

IDEX employees, officers and directors may from time to time receive requests from charities for contributions from IDEX, such as requests for donations of computer 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 IDEX's General Counsel or Deputy General Counsel and a senior executive of the affected IDEX Unit, Group or Segment who has no direct or indirect personal interest or involvement in the charity.

### **Environmental Protection**

IDEX believes that every company has a responsibility to protect the environment and human life and health. Each IDEX employee, officer and director is expected to fully comply with laws governing the protection of the environment and human life and health. No IDEX employee, officer or director individual may knowingly buy, use or dispose of any chemical or other substance other than in accordance with applicable law. Supervisors are expected to stay current with all relevant laws concerning the protection of the environment and human life and health, to seek professional guidance when necessary, and to assure compliance with such laws.

Individuals who knowingly violate any law for the protection of the environment or human life and health will be subject to discharge and prosecution. Accidental and other incidents which affect the environment and human life and health are to be reported immediately to IDEX's Corporate Director - Environment, Health & Safety, and measures are to be undertaken immediately to minimize any adverse impact.

### **Responsibilities to Employees**

IDEX believes that all of its employees should have a safe work place and equal opportunities for promotion and advancement. IDEX is committed to maintaining safe working conditions in all of its facilities and will comply with all occupational safety, health, discrimination, equal employment opportunity, disability, wage and hour, and other employment-related laws. Employees are expected to assume individual responsibility for safety procedures, following all necessary precautions, avoiding any activity that might endanger fellow employees, and notifying supervisory personnel of any potentially dangerous conditions in the work place. Supervisors are expected to promptly correct any serious safety hazards and to stop any production process involved until the hazard has been properly addressed.

It is IDEX's policy that all of its employees have a work environment free from sexual or racial harassment. Sexual or racial harassment in any form is totally unacceptable and will not be tolerated. Sexual harassment includes unwelcome sexual advances or



requests for sexual favors, where such conduct is made an express or implied condition of employment, as well as the creation of an intimidating, hostile or offensive work environment through unwelcome sexual conversations, advances, jokes or suggestive objects or pictures. An employee who believes that he or she has been subjected to sexual or racial harassment is encouraged to immediately bring the complaint to any member of local management, including his or her supervisor, the business leader of his or her Business Unit, Group or Segment, or IDEX's General Counsel or Deputy General Counsel, Chief Compliance Officer or Chief Human Resources Officer. Any complaint of sexual or racial harassment will be immediately investigated and appropriate action taken.

### **Respect of Privacy and Personal Information**

IDEX safeguards confidential and private personal information. This includes information collected and processed for Human Resources, recruiting, remuneration and training purposes, managing individual performance, administering benefits and providing occupational health and safety.

IDEX employees, officers and directors should understand and adhere to all applicable laws as well as IDEX policy on the use, protection and retention of confidential and private personal information. An employee should immediately advise the human resources leader for his or her Business Unit, Group or Segment and the IDEX General Counsel or Deputy General Counsel, the IDEX Compliance Department or the IDEX Human Resource Department of any accidental or intentional loss or disclosure of employee or other confidential and private personal information.

### **Violence, Threats and Weapons**

Personal safety is extremely important to IDEX. IDEX employees, officers and directors are prohibited from engaging in violence or other deliberate acts intended to harm another person or their property, including, but not limited to, making threatening or menacing comments or behaving in such a way that may threaten the personal safety and/or property of another person. An employee should immediately advise the human resources leader for his or her Business Unit, Group or Segment and the IDEX General Counsel or Deputy General Counsel and the IDEX Human Resource Department of violence or threats of violence against the employee or any other person.

IDEX prohibits the possession, concealment, use or transfer of any firearm or other weapon, including knives, clubs or other devices that are primarily used to inflict injury, on any IDEX premises (including buildings, parking lots, walkways and any other property leased or owned by IDEX). This prohibition also applies to IDEX employees, officers and directors in any location outside the home when conducting IDEX business.

### **Use of Alcohol and Drugs**



IDEX is strongly committed to preventing illegal activities, protecting its employees, company property and the public from any danger which might result from the use of drugs or alcohol, and providing of a safe, drug-free and alcohol-free work environment.

In the work place, drug and alcohol abuse can create hazardous situations, lower productivity and cause potential problems with fellow employees, customers, suppliers and others with whom IDEX does business. Use or possession of illegal drugs during working hours or on IDEX premises (including buildings, parking lots, walkways and any other property leased or owned by IDEX) is strictly forbidden, and is cause for discipline up to and including discharge, and may result in criminal charges. Except in connection with IDEX sponsored events, use or possession of alcohol during working hours or on IDEX premises (including buildings, parking lots, walkways and any other property leased or owned by IDEX) is strictly forbidden, and is cause for discipline up to and including discharge. Employees reporting to work under the influence of drugs or alcohol are subject to discipline up to and including discharge.

Although IDEX may provide assistance to employees who seek help in overcoming an addiction to or dependence upon alcohol or drugs, participation in an employee assistance program will not prevent disciplinary action for policy violations which have already occurred.

### **Reporting Practices and Financial Information**

Reporting at all levels throughout IDEX must be factual, complete and accurate.

IDEX's business integrity is reflected in a concrete way in its books and records. IDEX employees, officers and directors are responsible for ensuring the accuracy and reliability of IDEX's accounts. Fictitious, improper, deceptive, undisclosed or unrecorded accounts of funds or assets are a serious ethical violation and potential violation of law. It is IDEX's policy that all books and records conform to generally-accepted accounting principles and to all applicable laws.

All transactions must be accurately documented and accounted for in the books and records of IDEX. All entries must contain appropriate descriptions of the underlying transactions and no false or deceptive entries may be made. No employee, officer or director may enter into any transaction with the knowledge that it is other than as described in the supporting documentation. Furthermore, no employee, officer or director may participate in obtaining or creating false invoices, payroll records or other misleading documentation or inventing or using fictitious entities, sales, purchases, services, loans or other financial arrangements for any purpose. Finally, IDEX will not maintain or use any anonymous ("numbered") bank account or other account that does not identify IDEX's ownership.

All disclosures in reports and public documents that IDEX files with the Securities and Exchange Commission ("SEC") and in other public communications made by IDEX shall be full, fair, accurate, timely and understandable. Members of IDEX's senior



management will have the general responsibility for preparing SEC filings and other public communications and will ensure that they are fully informed with respect to these matters and that these filings and communications comply with IDEX policy and applicable laws. Employees, officers and directors who provide information for use in these filings and other public communications must strive to provide full, fair, accurate, timely and understandable disclosure. In addition, IDEX employees, officers and directors have an affirmative obligation to inform IDEX's senior management if they have knowledge of any information which would affect future filings and other public communications or if they learn that information in a filing or other public communication was untrue or misleading at the time the filing or other public communication was made or has subsequently become untrue or misleading.

### **Improper Influence on Conduct of Audits**

No IDEX employee, officer or director may take any action to fraudulently influence, coerce, manipulate or mislead any independent public or certified accountant engaged in the performance of an audit of the financial statements of IDEX. Further, no employee, officer or director may take any action to fraudulently influence, coerce, manipulate, or mislead any member of IDEX's Internal Audit, Legal or Compliance Departments engaged in the performance of any internal audit or investigation. All employees, officers and directors must fully cooperate in any audit or investigation being conducted by IDEX's Internal Audit, Legal or Compliance Departments or its external auditors or attorneys.

### **Product Integrity**

Strict product integrity is necessary for IDEX to achieve its quality objectives and to maintain its reputation for quality. It is IDEX's policy to never willfully conceal defective work or material, falsify records, or make false certifications or claims regarding its products. In some instances, particularly in connection with government contracts or subcontracts, it is necessary for employees to make specific product certifications, generate records and supply other information or statements concerning product integrity. It is unlawful to intentionally falsify such records for the purpose of misleading or defrauding the government or any such customer.

Each IDEX employee is responsible for ensuring the integrity of the products under his or her control and for the accuracy of the documentation he or she provides supporting product integrity. An employee should immediately advise his or her supervisor, the business leader of his or her Business Unit, Group or Segment and the IDEX General Counsel or Deputy General Counsel of incidents of suspected or known concealment of defective work or material or falsification of records.

### **Government Contracts and Relations**



IDEX's business relationships with its government customers are important to its continued success. IDEX wants to avoid even the appearance of an impropriety when dealing with government customers.

IDEX is required to maintain detailed records as well as abide by personnel regulations adopted by the various governments with which it conduct business. Every employee, officer and director involved in the verification or signing of certifications related to these requirements must ensure that the information is accurate and complete and that they possess the authority to sign these certifications on behalf of IDEX. Failure to do so could result in suspension or debarment from government business, in addition to serious criminal and civil liability for IDEX and the individual employees, officers and directors involved.

### **Trading in Stock and Other Securities – Insider Information**

IDEX is a public company with its common stock listed on the New York Stock Exchange. IDEX has established procedures to ensure that confidential information that could affect trading in its stock is kept confidential, that all persons who become privy to such information are aware of their obligation to refrain from trading in IDEX stock or discussing the information with outsiders until the information becomes public, and that confidential information that could affect trading in IDEX stock is disclosed only by IDEX's senior management in accordance with applicable law and regulations. Confidential information that could affect trading in IDEX stock includes such things as undisclosed financial performance information, indications of business potential, including sales and earnings, important breakthroughs in product development, inventions, obtaining or losing important business contracts, potential acquisitions or divestitures, and other material events that could influence investors to buy or sell IDEX stock.

Potential acquisition targets as well as many of IDEX's customers and suppliers and other companies with whom IDEX does business are also public companies with publicly traded stock and securities.

Until such time as information concerning material developments has been disclosed adequately to the public, it is unlawful for any person deriving such information to buy or sell not only IDEX stock on the basis of the information, but also publicly traded stock or other securities of potential acquisition targets, customers and suppliers, and other companies with whom IDEX does business on the basis of the information. While it is customary to speak of these restrictions as dealing with "insiders," they clearly apply to anyone inside or outside IDEX deriving material inside information. Thus, the persons affected by "insider" trading restrictions include not only IDEX employees, officers and directors at all levels, but also "tipees" who may receive the information from an IDEX employee, officer or director.

IDEX is pleased to have its employees, officers and directors participate in ownership of its stock, and the restrictions on "insider" trading are not intended in any way to



discourage that ownership. It is simply imperative that no trading in IDEX stock occur on the basis of material undisclosed information. If there is ever a question about the appropriateness of buying or selling IDEX stock, the question should be directed to IDEX's General Counsel, Deputy General Counsel, or Chief Financial Officer before carrying out the transaction.

### **No Corporate Loans**

IDEX will not provide or guarantee loans to any IDEX employee, officer or director that would be prohibited by any applicable law.

## **COMPLIANCE**

Each IDEX employee, officer and director is expected to be familiar with this Code and apply it at all times in the performance of his or her responsibilities. Employees, officers and directors who fail to comply with this Code are subject to disciplinary action up to and including immediate termination and may be personally subject to civil and/or criminal action. Nothing in this Code constitutes a contract of employment with any individual. IDEX supervisors are responsible for ensuring compliance with this Code by monitoring and enforcing this Code within their areas of responsibility. Indeed, such compliance will be one of the performance standards by which all supervisors will be measured. All supervisors are expected to lead by example and communicate a real concern for adherence to the ethical standards of this Code.

The business leader of each Business Unit, Group and Segment is responsible for overseeing compliance with this Code by his or her Business Unit, Group or Segment and the location manager at each IDEX location is responsible for overseeing compliance with this Code by the personnel at his or her location. To help with this responsibility, employees will be asked to certify to the code annually.

## **REPORTING PROCEDURES**

### **Asking Questions and Voicing Concerns**

This Code provides an overview of the legal and ethical responsibilities that all IDEX employees, officers and directors share. Each individual employee, officer and director is responsible for personally upholding these responsibilities. The standards and expectations outlined in this Code are intended to guide employees, officers and directors in making the right choices. If any aspect of this Code is unclear, or if an employee, officer or director should have any questions or face dilemmas or problems with respect to this Code, they should be brought to IDEX's attention in accordance with the applicable reporting procedures.



It is recognized that in some situations it is difficult to know right from wrong. Since every situation that may arise cannot be anticipated, it is important to have a way to approach a question, dilemma or problem. These are the steps to keep in mind:

- Make sure you have all the facts. To reach the right solutions, you must be as fully informed as possible.
- Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific issue you are faced with and the alternatives available to you. Use your judgment and common sense; if something seems unethical or improper, it probably is.
- Clarify your responsibility and role. In most situations, there is shared responsibility. Are your colleagues informed? It may help to get others involved and discuss the problem.
- Discuss the issue with your supervisor. This is the basic guidance for all situations. In many cases, your supervisor will be more knowledgeable about the issue, and your supervisor will appreciate being brought into the decision-making process. Remember that it is your supervisor's responsibility to help solve issues.
- Seek help from company resources. In the rare case where it may not be appropriate to discuss an issue with your supervisor, or where you do not feel comfortable approaching your supervisor with an issue, discuss it with the human resources leader for your Business Unit, Group or Segment, the business leader for your Business Unit, Group or Segment, or IDEX's General Counsel, Deputy General Counsel, Chief Compliance Officer or Chief Human Resources Officer.
- Always ask first, act later. If you are unsure of what to do in any situation, seek guidance before you act.

### **Reporting General Concerns and Violations**

It is emphasized that if an employee, officer or director has a concern or discovers an actual or potential violation of the law, company policy or this Code, he or she has a duty to report it immediately.

Actual and potential violations of the law, company policy and this Code may be communicated by any of the following methods:

- In writing, either by internal mail or regular mail, addressed to IDEX Corporation, Attention: Compliance Department, 1925 West Field Ct., Suite 200, Lake Forest, IL 60045.



- By logging on to the Ethics•Point website and reporting via the IDEX page at [https://secure.ethicspoint.com/lrn/en/report\\_custom.asp?clientid=2424](https://secure.ethicspoint.com/lrn/en/report_custom.asp?clientid=2424)
- By calling the Ethics Line using number below associated with the country where you are located:

Country	International Toll Free Numbers	Country	International Toll Free Numbers
Australia	1-800-339276	Korea (South)	00798-14-800-6599
Austria	0800-291-870	Mexico	001-800-840-7907
Brazil	0800-891-1667	Poland	0-0800-121-15-71
China (Telecom)	North: 10-800-712-1239** South: 10-800-120-1239**	Netherlands (Holland)	0800-022-6174
Denmark	8088-2809	New Zealand	0800-447-737
France	0800-902500	Singapore	800-120-4201
Germany	0800-1016582	Switzerland	0800-56-2907
India	000-800-100-1071	United Arab Emirates	8000-021 at prompt dial 866.292.2089
Ireland	1-800-61-5403	United Kingdom	0800-032-8483
Italy	800-786907	United States	866-292-2089
Japan (Japan Telecom)	0053-11-21520	Canada	866-292-2089
Jordan	1-880-0000 at prompt dial 866.292.2089	Puerto Rico	866-292-2089

The Ethics•Point website and the Ethics Line (which is answered by an outside vendor) are available to all employees, officers and directors, 7 days a week, 24 hours a day. The Ethics Line can be reached toll-free at the telephone number posted on IDEX’s website ([www.idexcorp.com](http://www.idexcorp.com)).

Although you are encouraged to identify yourself to assist IDEX in effectively addressing your issues, you may choose to remain anonymous, where allowable by law, and IDEX will use reasonable efforts to protect your identity. IDEX will also use reasonable efforts to protect the identity of the person about or against whom an issue is raised, unless and until it is determined that a violation has occurred. To this end, the Ethics•Point website and the Ethics Line are not equipped with caller ID, recorders, or other devices that can identify or trace the number from which you are calling.

When you log on to the Ethics•Point website or call the Ethics Line, this is what you can expect:

- Your report will be taken seriously.
- Your report will be forwarded for follow-up to appropriate IDEX personnel or, in the case of reports relating to issues regarding accounting, internal accounting



controls, or auditing matters as described below, to the Audit Committee of IDEX's Board of Directors.

- Your report will be addressed by such personnel or the Audit Committee and its designees and carefully evaluated before it is referred for investigation or resolution.
- Your report will be handled promptly, discreetly, and professionally. Discussions and inquiries will be kept in confidence to the extent appropriate or permitted by law.
- If you wish, you can obtain certain follow-up information about how IDEX addressed your report.

When reporting an issue, please supply sufficient information so that the matter may be investigated properly. As the ultimate objective of any investigation is to uncover the truth, any employee, officer or director who is found to have lied during an internal investigation will be subject to disciplinary action, up to and including termination, and may be personally subject to civil and/or criminal action. Full cooperation is expected both from the person who is suspected or accused of improper conduct and from the person who makes the accusation of improper conduct. Any information supplied will be handled in a confidential manner to the extent feasible and legally permitted. Moreover, as described below, IDEX prohibits retaliation for reporting issues in good faith.

Any person involved in any capacity in an investigation of possible misconduct must not discuss or disclose any information obtained in connection with the investigation to anyone outside of the investigation, unless directed otherwise by IDEX, required by law or when seeking legal advice.

Any use of these reporting procedures in bad faith or in a false or frivolous manner will be considered a violation of this Code. Further, you should not use any of these reporting procedures, including the Ethics•Point website and the Ethics Line, for personal grievances not involving an actual or potential violation of the law, company policy or this Code.

### **Reporting Concerns Regarding Accounting, Internal Controls or Auditing Practices**

Employees, officers and directors should bring to the attention of the Audit Committee of IDEX's Board of Directors any issues regarding accounting, internal accounting controls, or auditing matters. In addition to the applicable procedures outlined above, the Audit Committee has established additional procedures for the receipt, retention and treatment of reports received by IDEX regarding accounting, internal accounting controls, and auditing matters. If you have any such issues, you should report them through the Ethics•Point website or by calling the Ethics Line.



## **Non-Retaliation Policy**

If you report what you in good faith suspect to be unethical or illegal activities, you should not be concerned about reprisal or retaliation from IDEX. IDEX will not tolerate any reprisal or retaliation against a person who, in good faith, reports a known or suspected violation of the law, company policy or this Code. IDEX will take disciplinary action, up to and including immediate termination, against any IDEX employee, officer or director involved in any such reprisal or retaliation.

## **AMENDMENTS AND WAIVERS**

In the rare circumstance where an amendment or waiver of this Code would be appropriate for a director or executive officer of IDEX Corporation, such amendment or waiver must be approved by the Board of Directors of IDEX or a committee thereof, and must promptly be disclosed to the IDEX shareholders.

## **PERSONAL RESPONSIBILITY**

IDEX takes pride in the high standards of conduct that have been exhibited by its employees, officers and directors. Let us all resolve to continue to be a company which will tolerate nothing less than complete honesty, fairness and integrity in our dealings. High moral standards are just good business.