

Bribery and Corruption Policy

Introduction

Ludlum Measurements, Inc. (LMI) is unwavering in our commitment to conduct business with the utmost integrity and in full compliance with all applicable anti-bribery and anti-corruption laws and regulations. This policy sets forth our unequivocal stance against bribery and corruption, outlining stringent guidelines for all employees, officers, directors, contractors, consultants, and agents acting on behalf of LMI.

We strictly prohibit the offering, giving, receiving, or soliciting of any form of bribe, kickback, or improper inducement, whether directly or indirectly, to obtain or retain business or gain an unfair advantage. This prohibition applies to interactions with government officials, customers, suppliers, business partners, and any other individuals or entities. We adhere to the highest ethical standards and require all transactions and dealings to be transparent, fair, and free from any form of corrupt influence.

LMI complies fully with the Foreign Corrupt Practices Act (FCPA) in the United States, the UK Bribery Act 2010, and all other relevant anti-bribery and anti-corruption laws globally. We ensure that our policies and practices align with these laws and extend our commitment to jurisdictions where we operate. Any deviation from these laws is strictly prohibited and will be met with severe consequences, including legal action and termination of employment.

We conduct due diligence on all third parties, including agents, consultants, distributors, and suppliers, to ensure they adhere to our standards on anti-bribery and anti-corruption. Contracts with third parties will include provisions requiring compliance with this policy and applicable laws.

Gifts, Hospitality, and Expenses

All gifts, hospitality, or entertainment offered to or received from customers, suppliers, government officials, or any other party must be modest, reasonable, and in accordance with customary business practices. These must not be offered or accepted with the intent to improperly influence a business decision or secure an advantage. We maintain clear guidelines on the acceptance and reporting of such items to ensure transparency and accountability.

Facilitation Payments

We categorically prohibit facilitation payments, which are small payments made to expedite or secure routine government actions. Such payments are illegal under many anti-corruption laws and are strictly forbidden in all circumstances. Employees must refrain from making or authorizing facilitation payments on behalf of LMI, regardless of local customs or expectations.

Reporting and Training

LMI encourages a culture of transparency and accountability, where employees are empowered to report any suspected instances of bribery or corruption promptly and without fear of retaliation. We maintain confidential reporting channels and undertake thorough investigations of all reported concerns. Non-compliance with this policy, including failure to report suspicions of bribery or corruption, will result in disciplinary action, up to and including termination of employment.

Consequences of Violations

Any employee who breaches this policy will face disciplinary action up to and including termination and may face legal repercussions. We may terminate our relationship with individuals and organizations working on our behalf if they breach this policy.