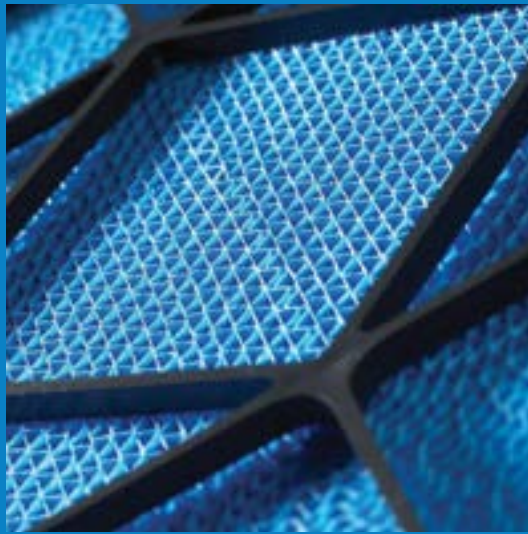
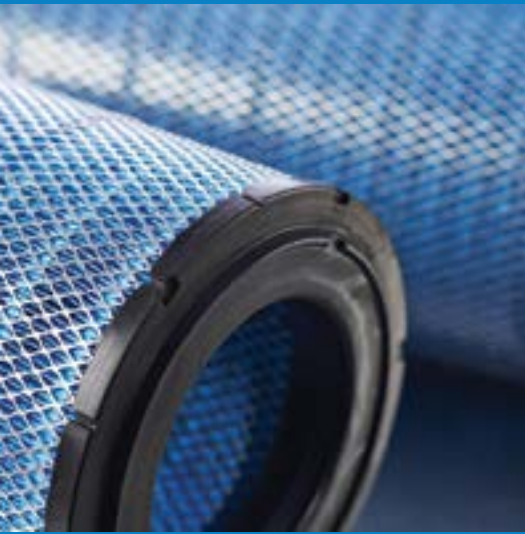


# Acting with Integrity

OUR CODE OF CONDUCT



Donaldson<sup>®</sup>  
FILTRATION SOLUTIONS

# WHY OUR CODE MATTERS

## A MESSAGE FROM TOD CARPENTER

Dear Colleague,

Since 1915, when Frank Donaldson developed his first air filter in an effort to help a customer, integrity has been an essential component of Donaldson's mission. Now, over 100 years later, we're a global company with thousands of employees and customers. Integrity is still at the core of who we are and what we do. At Donaldson, we strive to do the right thing – every day.

Our Code of Conduct ("our Code") reflects both our history and our future as a company. Donaldson has succeeded – and will continue to succeed – due to our product quality, innovation, customer service, and unwavering commitment to our six principles, which you can review on the following page. It's this commitment that will help us fulfill our purpose: Advancing Filtration for a Cleaner World.

Each of us is responsible for following the Donaldson principles and acting ethically. We all have a role in making sure our business is conducted in the right way and that we comply with the law, our Code, and our policies. Our Code is the foundation for how we work, as well as a guide for navigating issues, reporting concerns, and getting help. I encourage you to read it and take to heart the principles it represents.

*Speaking up* is key to our success – so be assured that Donaldson does not tolerate retaliation against those who are asking questions or raising their concerns in good faith.

Thanks for all you do. Together, we will continue to build an ethical, sustainable, and successful company that honors Frank Donaldson's legacy. Keep making decisions. Keep leading.

Tod Carpenter  
Chairman, President, and CEO



At Donaldson, we  
strive to do the right  
thing – every day.

# OUR PURPOSE AND THE PRINCIPLES THAT GUIDE US

## **Purpose: Advancing Filtration for a Cleaner World.**

We deliver on our purpose through a set of six principles that guide our behaviors, relationships, and interactions. They are at the heart of everything we do.

### **ACT WITH INTEGRITY**

We deliver on our commitments and are accountable for our actions – we do what we say we will do.

### **ENGAGE AND EMPOWER OUR PEOPLE**

We have a richly diverse and inclusive culture, and provide opportunities for our people to grow, build successful careers, and make meaningful contributions.

### **DELIVER FOR CUSTOMERS**

We understand, anticipate, and prioritize customers' needs, delivering differentiated products and solutions that enable their success.

### **CULTIVATE INNOVATION**

We pursue innovation in everything we do, from continuous improvement in our processes to breakthrough solutions that create value and competitive advantage.

### **OPERATE SAFELY AND SUSTAINABLY**

We are committed to safety in the workplace, being good stewards of natural resources, and reducing our environmental impact.

### **ENRICH OUR COMMUNITIES**

We share our time, resources, and talent to make a positive impact in the world.





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### **WAIVER**

At Donaldson, we do the right thing, follow through on our commitments, and hold ourselves accountable.



# ACT WITH INTEGRITY

Our Code applies at all times — and to all our employees.



## What Our Code Is All About

At Donaldson, our Code of Conduct is more than just a list of rules – it's an expression of the values and principles we live by. Our Code provides guidance and resources to help us maintain a workplace of integrity, respect, safety, and excellence.

While our Code is thorough, it doesn't cover every possible scenario you may encounter. As you read and reflect on our Code, please note any questions you may have and be sure to seek clarification from your Speak Up resources, which are detailed on page 6.

Our Code applies at all times, to all employees, including officers and directors of Donaldson Company, its subsidiaries, business units, partnerships, and joint ventures where Donaldson has a majority ownership position or exercises management control.

Failure to follow the standards of our Code or failure to report a known violation may lead to disciplinary action, up to and including termination of employment.

## Q&A:

### What happens if someone violates our Code?

There could be severe and lasting consequences for the employee and Donaldson. Reputations could be damaged, business could suffer, and in some cases, fines and penalties could be assessed on both the employee and Donaldson. Even if a violation doesn't result in civil or criminal penalties, it can result in disciplinary action and/or termination of employment for the employees involved.

## Your Role

Each Donaldson employee must follow the law, our Code, and our policies. You must also exercise good judgment. In any given situation, ask yourself:

- Is what I am doing lawful?
- Does this align with Donaldson's principles and policies?
- Could I defend my actions, or would I be proud of my choices?

"Yes!" should be your answer every time.

If you're ever unsure, or if you have any questions or concerns, Speak Up right away and seek guidance before moving forward.

## Our Managers' Role

Managers set an example for their colleagues and team members in the way they apply our Code and model our principles. All managers must:

- Promote a culture of trust and respect
- Ensure that their team members read and understand our Code and applicable policies
- Maintain an open-door policy and encourage employees to discuss ethics and conduct
- Welcome questions and support the reporting of concerns
- Ensure that appropriate actions are taken to address concerns that are raised
- Never retaliate against employees who raise concerns in good faith



## We Speak Up

Using your voice is a key component of acting with integrity. If you believe that our Code of Conduct has been violated or potentially violated, it's your duty to Speak Up.

**We ask questions when we don't understand something or need guidance.**

**We make a report if we see a violation of our Code, our policies, or the law.**

**We don't assume others will act – we each take responsibility.**

Our Code applies at all times — and to all employees.

*When possible, discuss your concerns with your manager or another manager.*

You can also seek guidance and report concerns to:

- **The Compliance Committee** ([GlobalCompliance@Donaldson.com](mailto:GlobalCompliance@Donaldson.com))
- **Human Resources**
- **Our Legal Department**
- **Internal Audit**

If using one of these resources is not possible or feels uncomfortable, you can access our Business Conduct Help Line, where you can make a secure and confidential report online (<https://secure.ethicspoint.com/domain/media/en/gui/19744/index.html>) or via telephone (888-366-6031 in the USA).

To reach the Business Conduct Help Line outside the USA, please refer to the listing of local numbers on the Help Line webpage: <https://secure.ethicspoint.com/domain/media/en/gui/19744/index.html>

## Q&A:

Lara's manager has asked her to alter the environmental impact data on a new product that she is presenting on. Lara hasn't spoken up because she fears her manager will get upset and possibly deny her the promotion she's hoping to receive. What should she do?

Lara should contact her manager's manager, Human Resources, or the Business Conduct Help Line and report her concerns. Her report will be investigated, and any retaliation from her manager or anyone else will not be tolerated.



## Retaliation Is Not Tolerated

Donaldson promotes a culture of openness and transparency, where all employees should feel empowered to Speak Up, ask questions, and report concerns. In order to maintain that culture, Donaldson strictly prohibits any form of retaliation – including harassment, discrimination, or threats of demotion or termination – because of a report made in good faith or for participation in any investigation. We do not attempt to silence or punish others for using their voice. Those who participate in retaliation will face discipline.

Similarly, Donaldson employees must not knowingly make false accusations or reports. Those who do will also face discipline.

[MORE INFORMATION](#)

## Our Investigation Process

When issues are raised, Donaldson will determine if an investigation is appropriate. Investigations will be handled as confidentially as possible. If you are asked to participate in an investigation, you must be truthful and volunteer any information you have.

In addition, you should never discuss any details of the investigation with persons outside the investigation team, and you must neither act in a way that interferes with or obstructs the investigation nor conduct your own investigation.

Based on the outcome of an investigation, employees who have engaged in improper conduct may face discipline, up to and including termination of their employment.

[MORE INFORMATION](#)

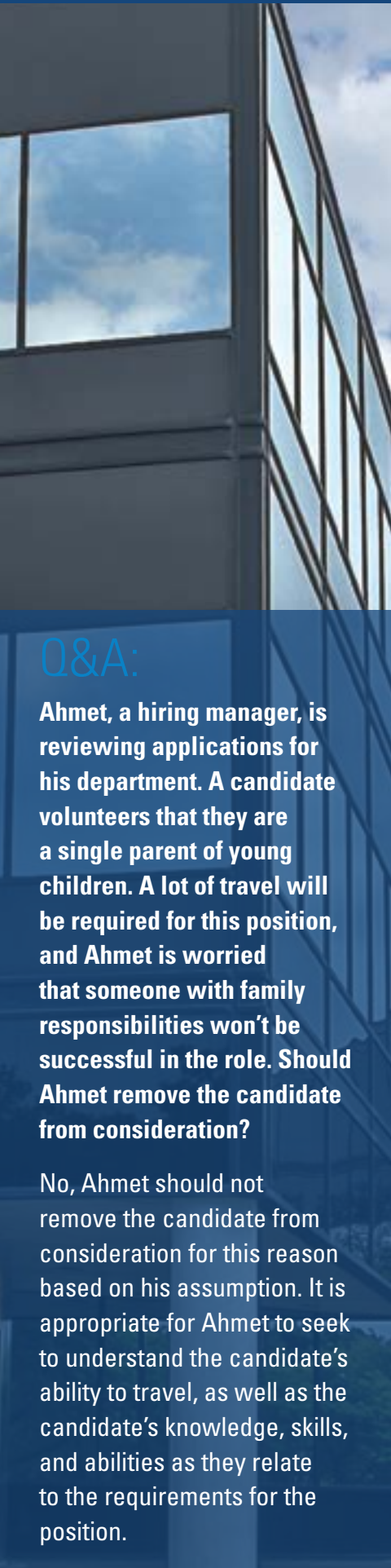






# ENGAGE AND EMPOWER PEOPLE

We honor and protect diversity and inclusivity. We create environments and opportunities for our people to flourish.



## Q&A:

**Ahmet, a hiring manager, is reviewing applications for his department. A candidate volunteers that they are a single parent of young children. A lot of travel will be required for this position, and Ahmet is worried that someone with family responsibilities won't be successful in the role. Should Ahmet remove the candidate from consideration?**

No, Ahmet should not remove the candidate from consideration for this reason based on his assumption. It is appropriate for Ahmet to seek to understand the candidate's ability to travel, as well as the candidate's knowledge, skills, and abilities as they relate to the requirements for the position.

## Our Respectful Workplace

At Donaldson, we're a team. We respect the dignity, privacy, and personal rights of every individual. We are committed to treating each other fairly and with respect.

When dealing with others, ask yourself:

- Am I speaking, communicating, and acting with respect, consideration, and kindness?
- How might my words and actions reflect on me, my team, and Donaldson?
- If others could hear and see me, or read what I am typing right now, what would they think?

Donaldson prohibits all forms of illegal discrimination. We understand that discrimination laws vary by country and may include discrimination based on race, religion, color, creed, national origin, age, sex, sexual orientation, gender identity or expression, marital status, physical or mental disability, genetic information, veteran status, or any other characteristic protected by these laws.

We don't engage in harassment, such as offensive comments or gestures, bullying, unwanted touching, unwanted sexual advances, or retaliation of any kind.

We don't ignore discrimination or harassment or allow anyone else to engage in it. If we see something, we Speak Up.

**OUR CODE DEFINED: Discrimination is the unfair or prejudicial treatment of people and groups based on the characteristics listed above. Harassment is unwelcome conduct, pressure, or intimidation.**

MORE INFORMATION

## Q&A:

**Asha has noticed that her manager often massages the shoulders of a co-worker in a way that just doesn't feel right to her. It's been going on for some time now, so she thinks the co-worker must be fine with it. Should she report it anyway?**

Asha shouldn't assume that her co-worker is OK with the behavior, nor should she assume that someone else will report it. We all have a duty to maintain a respectful workplace environment. If something seems wrong, you should Speak Up.

## Avoiding Conflicts of Interest

A conflict of interest occurs when an employee acts, or appears to act, in the employee's own personal interest rather than in the best interest of Donaldson. We never put our own personal activities, financial interests, or associations above our duty to each other and Donaldson.

When making a business decision for Donaldson, we:

- Deal with partners and customers fairly, without seeking any personal advantage
- Follow our Gift and Entertainment Policy upon giving OR receiving any gift, entertainment, or anything of value
- Promptly and fully disclose all personal relationships or other potential conflicts of interest to the Compliance Committee

It's important to realize that even the appearance of a conflict of interest could be problematic or potentially detrimental to the company. If you're unsure about whether there could be an issue or a conflict, Speak Up and discuss it with your manager or another Speak Up resource. You must also report, or disclose, known or suspected conflicts of interest involving other employees.

Some areas where we must be mindful of potential conflicts include:

- Supervision of friends, family, or romantic partners
- Outside business opportunities, including employment, whether those opportunities are with competitors, partners (including customers), potential partners, or any organization
- Competition with Donaldson in any way or taking or investing in opportunities that belong to Donaldson

### MORE INFORMATION



We honor and protect diversity and inclusivity. We create environments and opportunities for our people to flourish.

### Q&A:

**Xavier discovers that a building contractor who's bidding on an upcoming project is the cousin of a manager at Donaldson. Should he say something?**

Yes, Xavier should report this information to his supervisor or another Speak Up resource. The fact that a manager's relative is a potential vendor is not necessarily disqualifying, but all potential conflicts of interest need to be disclosed, reviewed, and approved by the Compliance Committee.



## Keeping Accurate Records

We keep transparent, accurate, complete, and up-to-date records in a manner that's consistent with established procedures and any applicable laws. False or misleading entries must never knowingly be made or concealed in any company record. Any issue with the accuracy of our records must be reported immediately to your manager or one of the other Speak Up resources.

[MORE INFORMATION](#)

## Q&A:

**Maxim has extra funds in the department budget earmarked for the current fiscal year, which ends in two weeks. Maxim asks a vendor to adjust the dates on an invoice to make it appear that work the vendor will be providing next quarter was done this quarter. Is this OK?**

No. While it may sometimes be appropriate to prepay for a service, the expense should be recorded in the actual period the work is performed. Also, it is inappropriate to ask a vendor to create an inaccurate invoice. We must keep truthful records that reflect the integrity with which we conduct business.

## Avoiding Insider Trading

We never buy or sell Donaldson stock while in possession of material, nonpublic company information. Similarly, we don't disclose to others (through "tipping") any material, nonpublic information about our company or about any other company for the purpose of trading securities.

All Donaldson officers and directors are subject to the additional restriction that they may purchase or sell company shares only after receiving the approval of the general counsel. We must avoid even the appearance of an improper transaction to preserve our company's reputation and avoid serious legal consequences.

**OUR CODE DEFINED: Material, nonpublic information is information that is not publicly available and that a reasonable investor would consider important to know if they were trading securities, such as: pending financial information, information about mergers or acquisitions, changes in leadership, product or marketing plans, or other significant business transactions.**

[MORE INFORMATION](#)



## Q&A:

**Pat knows that Donaldson is close to acquiring a smaller company that has plans to develop a product that will be a game-changer in gas turbine filtration. The sale won't be announced for a few more weeks, but he's so excited, he tells his brother about it. Is that OK?**

No. Revealing material, nonpublic information about topics such as products, business strategies, and acquisitions could be considered "tipping" and is against our policy and the law.



## Giving and Receiving Gifts and Entertainment

We do not seek to gain advantage through the improper use of gifts or entertainment. While the moderate and reasonable exchange of gifts and entertainment is acceptable, good judgment must be exercised to avoid reputational damage to our company and employees.

Offering, giving, soliciting, or receiving any form of kickback or bribe is always prohibited.

Modest meals, entertainment, or gifts that are less than US\$200 in value are usually acceptable, *but only* if they are:

- Not meant to influence a business decision
- Infrequent, unsolicited, and in compliance with our Gift and Entertainment Policy and our US\$200 limit
- Legal under local and applicable law and do not violate the other organization's rules or policies
- Associated with a business purpose and not a transaction that could create a perception of impropriety
- Accurately reported in our records

Gifts and entertainment can ***never*** be:

- Against the law, such as providing a gift to a government official
- Cash or cash equivalents (e.g., gift cards)
- Intended to gain specific business or influence a business decision (no quid pro quo)
- Indecent, sexually explicit, or otherwise in violation of our Code, our policies, or our values

You must seek written approval from your manager and the Compliance Committee (**GlobalCompliance@Donaldson.com**) for:

- Any gift or entertainment over our US\$200 limit
- Any gift or entertainment for a government official

If you receive a gift that doesn't meet our policy, return it. If it is impossible to return the gift, contact the Compliance Committee.

MORE INFORMATION

**OUR CODE DEFINED: A kickback is a bribe made as a reward for making or influencing a business arrangement.**

## Q&A:

**Miyeko is attending an out-of-town industry conference through Friday, but her flight home isn't until Saturday. A potential vendor has invited her to an exclusive resort for a round of golf on Saturday before she leaves. Since this will be on Miyeko's time, is it okay to accept?**

No. This entertainment is not clearly associated with a business purpose, nor is it likely to be under US\$200 in value. To avoid even the appearance of potential influence, Miyeko should decline. If she has questions, she should contact her manager or a Speak Up resource.

## Communicating Responsibly

We are transparent, honest, accurate, and timely in our communications with each other – and in our communications outside of Donaldson. We do not speak for the company unless authorized to do so.

We:

- Communicate truthfully and respectfully
- Clarify when a statement or opinion is our own and not Donaldson's
- Carefully consider the impact before posting on social media
- Recognize that our Code and our policies apply online
- Never reveal confidential information

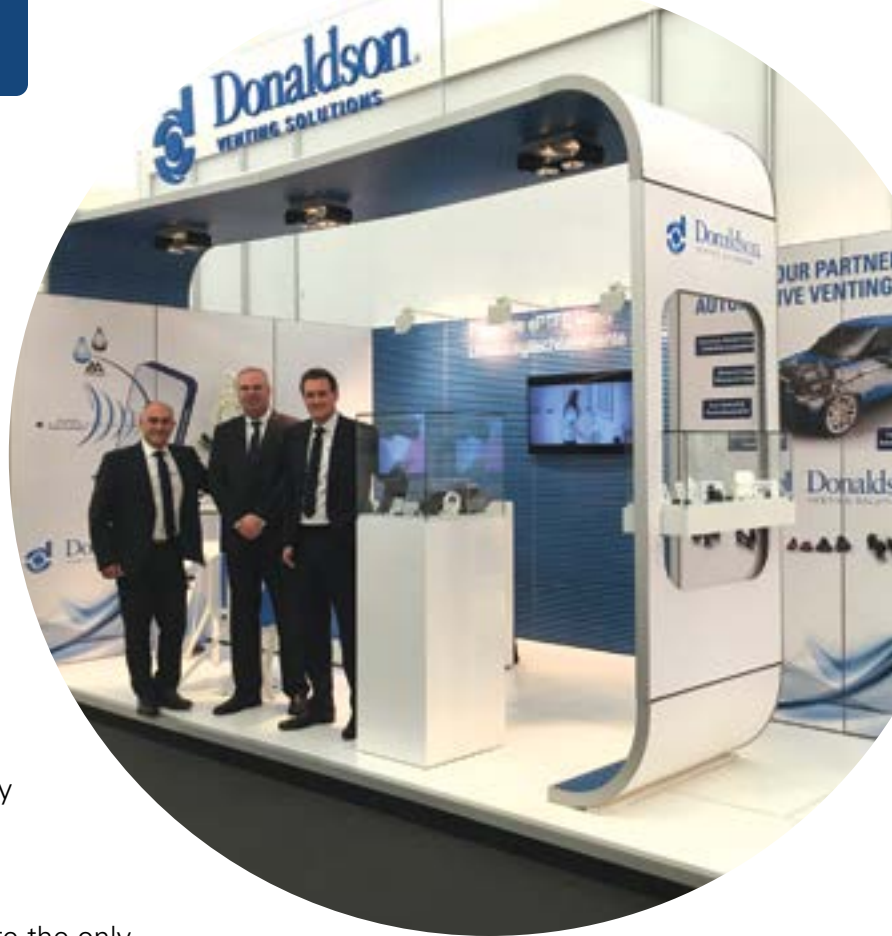
Donaldson has designated spokespersons who are the only personnel authorized to publicly discuss company information. Any external queries or requests for information should be passed on to them.

[MORE INFORMATION](#)

## Q&A:

**Maya comes across a social media post that makes inaccurate and disparaging claims about Donaldson products. Should she comment to set the record straight?**

No. Since it's not Maya's role at Donaldson to respond to social media messages, she should report the issue to her manager or a Speak Up resource.





## DELIVER FOR CUSTOMERS

Our customers – from farmers and small business owners to large corporations and governments – expect us to go the extra mile to meet their needs.

## Dealing Fairly with Our Partners

We are truthful and transparent, and our actions are consistent with our word. Our communities, partners, and suppliers can rely on Donaldson to ethically do what we say we will do.

We:

- Tell the truth and provide all relevant details
- Hold ourselves accountable for our words and actions
- Expect our partners to act ethically and honestly with us in turn

When selecting our partners (including dealers, distributors, consultants, agents, suppliers, vendors, contractors, or other third parties), we make decisions based on suitability and performance in the best interests of Donaldson, and we abide by our Code, our procedures, and the law. Partners are selected fairly, based on quality, service, efficiency, and price.

Just as we expect our employees to act with integrity, we expect our suppliers and other third parties, along with their employees, to conduct all business activities within the guidelines of Donaldson's Supplier Code of Conduct at all times.

We make purchasing decisions in the same manner. We make our choices based on the best interests of Donaldson, regardless of the manufacturer or provider.

[MORE INFORMATION](#)

## Working with Customers and Keeping Our Word

We treat our customers with respect, regardless of who they are or the amount of business they do with us. We maintain trust by being honest and fair in our dealings.

[MORE INFORMATION](#)



### Q&A:

**Mario works with a supplier who submitted a proposal that includes some mathematical errors in the cost calculation and lowers the price the supplier is willing to agree to sell to Donaldson. Should Mario notify the supplier of the error?**

Yes. Our relationships with our partners are built on mutual respect and honesty. We expect our partners to look out for Donaldson, and we do the same for them.





## We Deliver Quality

We also strive to consistently deliver products that live up to the Donaldson name. We make products that are safe, reliable, and efficient and that exceed customer expectations.

We:

- Consistently improve and set world-class standards and benchmarks
- Eliminate waste and variation
- Develop and empower our people and participate in professional training
- Standardize processes and measure our progress
- Follow all quality and safety policies and procedures

For more information, please refer to our Donaldson Quality Commitment.

MORE INFORMATION

## Q&A:

**Shannon works in fabrication, and she notices that a co-worker is skipping a production step. The co-worker insists that the designated procedure is “overkill” and that this shortcut saves time. What should Shannon do?**

Shannon should report the incident to her manager. Following procedure – even when it’s inconvenient – ensures the safety and quality of our products.



## Working with the Government

We conduct all of our interactions with government employees in a fair and honest manner. We will not authorize, pay, promise, deliver, or solicit any payment or favor, either directly or indirectly, for the purpose of improperly influencing any political official or government employee.

We will not entertain government employees in connection with company business unless it is done in compliance with all applicable laws and our Gift and Entertainment Policy.

Hiring current or former government employees or members of their families can present unique risks depending on their roles. Please consult your HR business partner or the Compliance Committee in these circumstances.

Contracting with the government is a unique part of Donaldson's business, and we comply strictly with all laws and regulations that apply to government contracting. We take care to adhere to all the terms of any government contract.

We also have a duty to cooperate promptly and fully with external audits and government investigations. This means we will provide truthful, complete, and accurate information, as requested, in a timely manner. We contact the Legal Department before responding to any non-routine government inquiries, inspections, subpoenas, or requests.

Our Code does not prevent anyone from providing information to a government entity, regulator, or inspector or from otherwise participating in a government investigation when acting as a whistleblower under applicable law.

[MORE INFORMATION](#)

Our customers – from farmers and small business owners to large corporations and governments – expect us to go the extra mile to meet their needs and always do the right thing.

## Q&A:

**Trent is negotiating an international contract. He has heard that by paying a few unofficial "fees," the contract will be approved faster. Should he do it?**

No. We don't make payments that could improperly influence a government decision. Trent should contact the Legal Department for guidance.

## Protecting Customer and Partner Privacy and Data

We have the utmost respect for our customers' and partners' privacy, and we're committed to keeping their data secure and protected from loss and misuse. Private data includes:

- Contact details (name, address, phone number)
- Financial information
- Confidential business information
- Intellectual property

We follow all policies, procedures, and laws when accessing, collecting, storing, using, transmitting, and destroying customer and partner data. We don't share this information with anyone, inside or outside of Donaldson, without proper authorization.

MORE INFORMATION

## Competing with Integrity

We believe in fair and free competition and never seek improper advantage in the marketplace by making unfair agreements with competitors.

We don't:

- Discuss our prices or strategies with our competitors
- Make agreements with competitors to allocate territories, markets, or customers
- Discuss restricting trade or excluding competitors with customers or suppliers
- Improperly collect proprietary or confidential information that belongs to our competitors

Competition laws, sometimes called antitrust laws, can be complex and vary from country to country. If you have any questions or concerns about fair competition, contact the Legal Department.

MORE INFORMATION

## Q&A:

**Ana has just transitioned to a role in account management and wants to learn as much as possible about the partners whose accounts she now covers. She plans to transfer some partner data files to her personal computer so she can read through them over the weekend. Is this okay?**

No. Despite Ana's good intentions, she should not download confidential partner information to non-company-owned devices or otherwise fail to follow our data security processes and policies.

**OUR CODE DEFINED:**  
**Antitrust laws are laws that are designed to level the playing field of the free market by ensuring that businesses compete fairly.**

## Q&A:

**Sandra receives a call from a competitor who asks her to dinner to discuss his company's upcoming product releases. Is it okay for Sandra to meet with the competitor to see what they are planning?**

No, Sandra should not attend without first getting approval from the Legal Department. Meetings with competitors, no matter how well-intended, can create situations that violate our policies, our Code, or the law.



# CULTIVATE INNOVATION

We adapt to our ever-changing environment with our relentless drive to pursue innovation, deliver breakthrough solutions, and exceed expectations.



### Protecting Our Data and Confidential Information

We protect Donaldson’s confidential information – including trade secrets, customer data, partner information, employee data, business strategies, marketing plans, financials, research and development information, and other nonpublic business information – from misuse, theft, or loss.

We don’t give confidential information to partners, customers, or other third parties unless that disclosure is properly authorized.

We follow our obligations under confidentiality agreements, whether with Donaldson or other companies, including former employers. Our obligation to preserve Donaldson’s confidential information continues during and even after our employment with the company.

We respect the intellectual property rights of Donaldson as well as external parties. We refrain from using intellectual property without proper licensing or authorization.



MORE INFORMATION

### Q&A:

**Kamal has left Donaldson to start his own software company. He has taken a list of Donaldson customers who worked with his department to use as his initial contacts. Is this OK?**

No. Even after he leaves the company, Kamal has an ongoing obligation to maintain the confidentiality of company information.

**OUR CODE DEFINED: Intellectual property refers to products of the mind, such as inventions, business symbols, designs, images, and names. It can be protected with patents, trademarks, trade secrets, or copyrights.**

∴ We adapt to our ever-changing environment with our relentless drive to pursue innovation, deliver breakthrough solutions, and exceed expectations.



## Q&A:

**Andre found some documents next to the copy machine that contain details on salaries and bonuses. What should he do?**

Andre should immediately report the incident and give the documents to Human Resources. He should keep any information he saw confidential and not disclose it to others.

## Protecting Company Assets

Our corporate assets are the tools that allow us to get our work done successfully.

They include:

- Facilities
- Equipment
- Tools
- Inventory
- Physical materials
- Computers
- Electronics
- Networks
- Devices
- Software
- Other technology
- Office supplies

These assets must be used safely and responsibly for legitimate business purposes only. Similarly, we protect the assets of our partners and customers.

[MORE INFORMATION](#)

## Protecting Employee Privacy

We are committed to keeping employee data private and secure. Business purposes often require us to collect, use, and store sensitive personal information. Security breaches can cause damage to companies and individuals.

Therefore, we must be careful with data we may have access to, including:

- Employee personnel files
- Employee medical or health information
- Employee financial information
- Employment history
- Background check data
- Other personal information, such as contact or identification details

Access to personal information should be granted only to those with authorization and a business need.

All policies, procedures, and laws must be followed when accessing, collecting, using, transmitting, and destroying employee data.

[MORE INFORMATION](#)



## OPERATE SAFELY AND SUSTAINABLY

We do the right thing for our company, people, *and* planet. We prioritize safety in the workplace and stewardship of natural resources.

## Our Safe and Healthy Workplace

A healthy, safe, and secure workplace reduces stress, increases job satisfaction, and allows us to focus on our goals and customers.

We prioritize safety and security when we:

- Follow all safety, health, and environmental laws and regulations, policies and procedures
- Perform work for which we are trained, fit, and competent
- Stay alert, look out for hazards, and Speak Up if we see something unsafe or potentially unsafe
- Promptly report all accidents and injuries

While at work, we must not use alcohol, illegal substances, or anything that could impair our judgment.

We don't make threats or intimidate others, and the use, displaying, or carrying of weapons on company premises is strictly prohibited.

[MORE INFORMATION](#)



## Q&A:

**Ha-eun notices that a co-worker is operating a machine without the required safety equipment. He knows from experience that utilizing the safety equipment typically slows down production and decreases output. What should he do?**

Safety always comes first. Ha-eun should immediately and safely remind his co-worker about the proper procedure and then report the issue to a manager. Perhaps Ha-eun's team can work together to come up with a safe and efficient solution.



## Protecting the Environment

At Donaldson, we are responsible stewards of our shared environment. We preserve and protect our resources and minimize our impact by:

- Following all environmental policies, procedures, laws, and regulations
- Reducing, reusing, and recycling
- Maximizing energy efficiency and consuming fewer resources

We have established various environmental, health, and safety targets and objectives in our global Environmental, Health & Safety (EHS) Policy, and we publicly report our progress in our Corporate Sustainability Report. We focus on protecting employees while continuously reducing environmental impacts through pollution prevention, energy conservation, and waste minimization.

MORE INFORMATION



## Q&A:

**Aisha overhears a co-worker talking about dumping some solvent down a drain. When she asks him about it, he says that he doesn't know what she's talking about. Aisha didn't actually see anyone doing anything. Should she report this?**

Yes. If she knows there's a chance that the environment is being impacted by an action, inaction or by a Donaldson employee or practice, she should Speak Up.

**OUR CODE DEFINED: The concept of sustainability refers to the ability to meet our current needs without compromising the ability of future generations to meet *their* needs.**

... We do the right thing for our company, people, *and* planet. We prioritize safety in the workplace and stewardship of natural resources.



## ENRICH OUR COMMUNITIES

We share our time, resources, and talent to make a positive impact in the world.



## Avoiding Bribes and Corruption

Corruption is a severe impediment to sustainable economic, political, and social progress for countries at all levels of development. Businesses that engage in bribery forego innovation and competitiveness, while governments that allow individuals to divert state funds for personal use do so by sacrificing the well-being of their people.

At Donaldson, we act with integrity, and we don't bribe. Bribery and other forms of corruption are strictly prohibited.

We never provide anything of value to commercial partners or government officials to gain or retain business, secure any business advantage, or otherwise influence any business decisions.

This policy also applies to anyone who represents Donaldson, including our consultants, partners, agents, contractors, and any other third parties.

We:

- Always comply with Donaldson's policies and procedures for gifts and entertainment
- Maintain accurate and complete records of all business expenses
- Never accept or return part of a sum already paid (commonly called a kickback) to secure business or influence a business decision

No business is worth the price of a bribe. Anti-corruption violations can carry significant penalties for both Donaldson and those individuals involved.

[MORE INFORMATION](#)

**OUR CODE DEFINED: "Anything of value" includes cash, cash equivalents (such as gift cards), charitable donations, loans, gifts, favors, entertainment, and opportunities.**

**OUR CODE DEFINED: A "government official" may be a government employee or an employee of a business that is owned or controlled by a government, such as a purchasing agent who works for a state-owned manufacturer. Government officials may also include politicians and those working for international organizations like the Red Cross.**







Q&A:

Linda visits a supplier's warehouse in another country, and during a tour of the facility, the manager mentions that the supplier holds on to its workers' passports for them as "motivation." She doesn't think this is right, but the facility is not operated by Donaldson. What should she do?

Even if Linda's not sure whether the supplier is doing anything wrong, she should still report her concern to her manager or another Speak Up resource. The correct department will then be able to verify whether the supplier is abiding by the Supplier Code of Conduct and the law.

**Our Community Engagement**

At Donaldson, we give back. We are proud to be a good corporate citizen through centralized giving as well as through employee-led, grassroots efforts.

Founded in 1966, the Donaldson Foundation strives to make a meaningful impact in our communities by proudly supporting programs and organizations that direct time and effort towards education. Program grants provided by the Donaldson Foundation impact a broad range of educational interests in our communities, including early childhood development, K-12, post-secondary, adult learner, and self-sufficiency education.

In addition, Donaldson employees at our corporate offices, plants, and distribution centers all over the world are empowered to volunteer and raise money for local charitable causes and organizations.

Charitable contributions made by Donaldson, or on behalf of Donaldson, that exceed US\$200 (or equivalent in value) require prior written approval from the regional or functional vice president and the Compliance Committee.

MORE INFORMATION

**Protecting Human Rights**

We believe in treating all people with respect and dignity, and we demand that our partners do the same. All Donaldson partners and suppliers must provide working conditions that are fair, non-discriminatory, equitable, and safe.

We strongly oppose any person or organization, including our suppliers, using child, slave, or forced labor, or participating in human trafficking. As a global company, Donaldson is committed to compliance with all applicable labor laws, including **California's Transparency in Supply Chains Act of 2010**, the **UK Modern Slavery Act**, and other applicable laws.





## Responsibly Participating in the Political Process

As engaged citizens, we may participate in the political process as individuals, not as representatives of Donaldson. You should never use Donaldson resources for political activities or give the impression that Donaldson sponsors or endorses any candidate.

We comply with all laws regarding political contributions. We do not contribute any company funds, property, or services to any elected official, political party, committee, or candidate without pre-approval from our Legal Department.

No one may pressure employees to make political contributions or support a political party, political action committee, or political candidate.



## Q&A:

**Desmond is volunteering for a local political candidate and is planning to help out by passing out flyers at work on his lunch hour. Is this OK?**

No. Even though Desmond is using his lunch hour, he shouldn't pressure his co-workers to support any political candidate.

## Following International Trade Laws

To successfully import and export products around the world, it is imperative that we comply with all applicable import and export laws, regulations, and policies that govern our global business. This includes laws governing the trade of goods, software technology, and technical data and services, as well as regulations regarding embargoes, boycotts, and other economic sanctions.

Trade laws can be complicated, and they often change, so seek guidance if you have any questions, and review our policy. Failure to successfully navigate trade laws can result in severe penalties, such as adverse publicity, delay or seizure of shipments, loss of import and export privileges, and/or civil and criminal penalties.

[MORE INFORMATION](#)

... We share our time,  
... resources, and  
... talent to make a  
... positive impact in  
... the world.



# WAIVER

Any waiver of any provision of our Code must be approved in advance by our company's board of directors or an appropriate committee of the board of directors. Any waiver of our Code approved by the board of directors for an executive officer or director must be promptly disclosed to shareholders.

# SPEAK UP!

## Don't Forget to Speak Up

Remember, using your voice is a key component of acting with integrity and following our Code. Be ready to Speak Up immediately when questions or concerns arise.

### Your Manager

When possible, discuss your questions or concerns with your manager or another manager.

### The Compliance Committee

([GlobalCompliance@Donaldson.com](mailto:GlobalCompliance@Donaldson.com))

### Our Legal Department

### Human Resources

### Internal Audit

If using one of these resources is not possible or feels uncomfortable, you can access our Business Conduct Help Line, where you can make a secure and confidential report online

(<https://secure.ethicspoint.com/domain/media/en/gui/19744/index.html>)

or via telephone (888-366-6031 in the USA)

To reach the Business Conduct Help Line outside the USA, please refer to the listing of local numbers on the Help Line webpage: <https://secure.ethicspoint.com/domain/media/en/gui/19744/index.html>

