



Donaldson[®]
FILTRATION SOLUTIONS



ACT WITH INTEGRITY

OUR CODE OF CONDUCT



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What We Do: A Message from Our CEO

In 1915, a tractor salesman named Frank Donaldson had a customer. And that customer had a mess on his hands – a dusty field that continually clogged up his tractor’s engine. Frank thought long and hard about the problem and arrived at a simple but powerful solution. That’s how the very first Donaldson air filter came into existence.

Since then, a lot has changed. Donaldson has grown into a global company, and we do a whole lot more than just help fix tractor engine problems. The broad array of customers and industries we serve is reflected in the capacity and advanced technology of the products we produce today. But what we fundamentally do has not changed. Customers come to us with an issue, and we provide them with innovative solutions, quality products, and reliable customer service. That is why, more than 100 years later, we continue to make good on our commitment to advancing filtration for a cleaner world.

Our Code of Conduct (Code) is more than a list of rules – it is an expression of the values and principles we live by and a vital tool for understanding who we are and how we do business.

The pages ahead lay out clear expectations about acting with integrity, which are based on our six guiding principles. I encourage all employees to familiarize themselves with this document, as doing so will help each of us stay in compliance with the law and our policies.

I am honored to lead this company and excited about what lies ahead. Together, we will continue to be a company that is ethical, innovative, sustainable, and successful.

Sincerely,

Tod Carpenter

Chairman, President, and CEO





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Our Purpose and Principles

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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WE LIVE OUR PRINCIPLES

**WHEN WE STICK TO OUR PRINCIPLES,
WE SET OURSELVES UP FOR SUCCESS.**



About Our Code

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.

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.

Failing 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.

Your Responsibilities

Each Donaldson employee has a responsibility to:

- Follow the law, our Code, and our policies
- Align their actions with Donaldson’s purpose and principles
- Ask for help when challenges or conflicts arise
- Speak up whenever they witness or suspect misconduct



Integrity in Action

Q I’m working on a project with a cross-departmental team.

A manager on the team suggested we do something that I believe violates our Code, but everyone else seems okay with it. Should I just let this go?

A No, you shouldn’t. Nobody at our company, no matter their role, has the authority to ask you to ignore something that might violate our Code, policies, or the law. Report your concerns to your manager, the [Compliance Committee](#), or another [Speak Up](#) resource.

Manager Responsibilities

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



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Making Ethical Decisions

Our Code addresses some of the most common issues that may come up during your work. But of course, it's impossible to anticipate every possible scenario. When faced with a difficult or uncertain choice, ask yourself:



"YES!" should be your answer every time.

If you answered **"no"** or were uncertain about any of these questions, **Speak Up** right away and seek guidance before moving forward.



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Speaking Up

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

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

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.

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

You can also seek guidance and report concerns to:

- [Compliance Committee](#)
- [Human Resources](#)
- [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](#) or via telephone. Callers in the U.S. may dial 888-366-6031 directly, while those calling from outside the U.S. may refer to the listing of local numbers on the [Help Line webpage](#).

PROTECTING WHISTLEBLOWERS

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.

INTEGRITY COMMITMENT RESPECT INNOVATION



Integrity in Action

Q One of my coworkers recently raised a safety concern with our supervisor, and I've noticed that she's been treating him differently ever since, by criticizing him a lot in front of other people, "forgetting" to include him in staff meetings, things like that. Is she retaliating against him?

A Possibly, but it's not your responsibility to determine whether her actions rise to the level of retaliation. It is your responsibility to inform the company about your supervisor's behavior, however, since you suspect she may be violating the Code. Report your concerns to your manager, the [Compliance Committee](#), or another Speak Up resource.



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Non-Retaliation

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.

Investigations

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 anyone outside the investigation team, and you must never 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 employment.

If making a report through the [Business Conduct Helpline](#), help facilitate a thorough and expedient investigation by:

- **Being prepared to provide as much detail as possible (who, what, where, and when)**
- **Safely storing your assigned report number to allow for easier follow-ups (this is especially important if you report anonymously)**
- **Being aware that Donaldson may not be able to inform you of disciplinary actions taken out of respect for privacy rights**

Waivers of the Code

In limited situations, it might be appropriate for Donaldson to waive a part of the Code. Any waiver must be approved by the appropriate supervising authority, which, in the case of any waiver for an executive officer or member of the board of directors, is our company's board of directors. In addition, any waiver of the Code approved by the board for an executive officer or director must be promptly disclosed to shareholders.

Our Code Defined: Making a report in “**good faith**” means providing an honest and full report of all relevant information, regardless of whether your report uncovers actual misconduct.



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WE EMPOWER EACH OTHER

WE'RE AT OUR BEST WHEN WE WORK TOGETHER.



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A Respectful Workplace

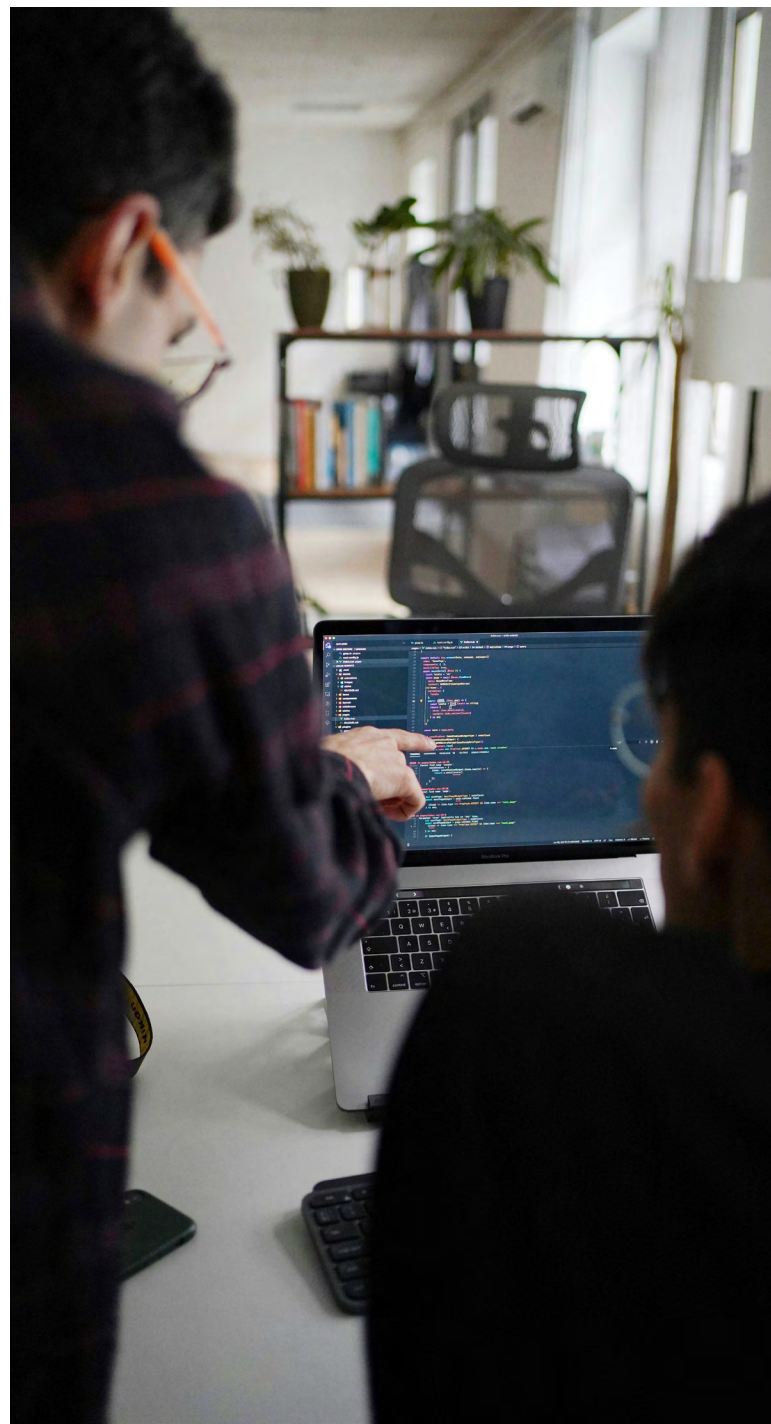
At Donaldson, we're a team. We respect the dignity, privacy, and personal rights of every individual. We are committed to treating each other fairly and with respect.

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?

Our Code Defined: "Discrimination"

is the unfair or prejudicial treatment of people and groups based on protected characteristics.



Integrity in Action

Q

I overheard two colleagues making remarks with sexual connotations about my teammate. I'm not entirely sure if they were just joking. Should I raise this to anyone?

A

Yes. Regardless of their intent, comments of a sexual nature can contribute to a hostile work environment and may be considered sexual harassment. This can affect not only the individual being spoken about but also other colleagues who overhear the conversation. If you feel comfortable, you can address the behavior directly by asking them to stop. However, if you are not comfortable or if the behavior persists, it is important to report your concerns to your manager, the [Compliance Committee](#), or another [Speak Up](#) resource.



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A Respectful Workplace

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

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](#).



Integrity in Action

Q My manager has asked me out for drinks several times, and I have always declined. The last time this happened, she shrugged and said, "Oh well, guess you're not the kind that cares much about getting ahead at work." Is that considered sexual harassment?

A Yes. When employment decisions, such as promotions, are based on an employee's willingness to have a romantic relationship or grant sexual favors, this is considered sexual harassment and should be reported immediately to Human Resources, the [Compliance Committee](#), or another [Speak Up](#) resource.





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Health and Safety

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

- 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.



INTEGRITY
COMMITMENT
RESPECT
INNOVATION



Integrity in Action

Q I'm new to the company and just received training on a piece of equipment. A colleague suggested a "shortcut" that seems to violate the safety procedures I just learned. Since this person is more experienced than I am, should I take the suggestion?

A No, you shouldn't. You or someone else could get hurt. Let your colleague know that this suggestion goes against our safety procedures. If your colleague dismisses your concerns, report your concerns to your manager, the [Compliance Committee](#), or another [Speak Up](#) resource.



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Conflicts of Interest

When making a business decision, never put our own personal activities, financial interests, or associations above our duty to each other and Donaldson.

- WE:**
- Deal with partners and customers fairly, without seeking any personal advantage
 - Follow our [Gift and Entertainment Policy](#) when giving OR receiving any gift, entertainment, or anything of value
 - Promptly and fully disclose all personal relationships or other potential conflicts of interest through our [Disclosure Management system](#)



Integrity in Action

Q My spouse recently got a new job with one of our vendors. Since we work in different areas and wouldn't have contact with each other, do I have to disclose this?

A Yes, you should disclose this because you have a close family member working for one of our business partners. It's good that you wouldn't be in contact with each other professionally, and that likely means there is no actual conflict now, but if your (or your spouse's) responsibilities change, it could lead to a future conflict. You must disclose this situation to your manager and the [Compliance Committee](#). That way, we're better prepared to address the potential conflict before it causes harm.





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RESOURCES

Conflicts of Interest

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**



Integrity in Action

Q

My friend owns a small business that supplies consultation services we are currently bidding out. May I suggest her company as a possible vendor?

A

Yes, if you disclose your relationship with your friend and her company to your manager and the [Compliance Committee](#). You should also recuse yourself from the procurement process to avoid any appearance of bias.





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Gifts, Entertainment, and Hospitality

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.

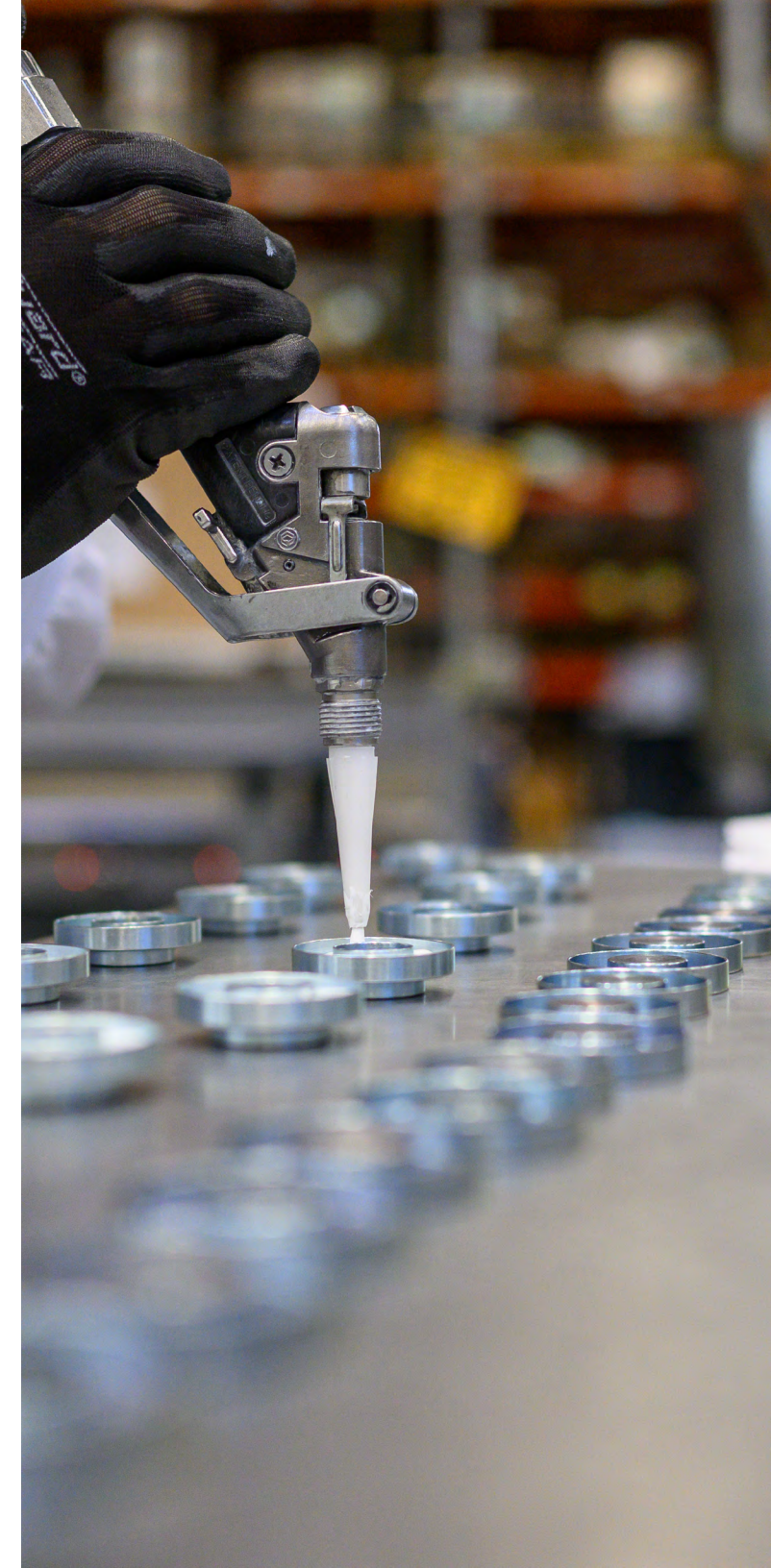
Our Code Defined: A **“kickback”** is a bribe made as a reward for making or influencing a business arrangement.

“Cash equivalents” can include gift cards, stocks, bonds, loans, cryptocurrency, and other securities.

Modest meals, entertainment, or gifts that are less than US \$200 in value are usually acceptable, but if you have doubts, ask yourself the following questions:

- Is it offered regularly?
- Does the gift come in the form of cash or a cash equivalent?
- Is it unrelated to any legitimate business purpose?
- Does it violate our Code, policies, or the law?
- Does it violate the other party’s policies?
- Is it meant to influence a business decision?
- Are reciprocal gifts or favors expected in return?
- Is it given discreetly or “off the books?”
- Is it illegal, offensive, or sexually explicit?

If you answered **“YES”** to any of these questions, the gift is inappropriate and should be declined and reported.





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RESOURCES

Gifts, Entertainment, and Hospitality

You must seek written approval from your manager and the **Compliance Committee** for:

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

You can access our gift and entertainment disclosure forms for **gifts given** and **gifts received**.

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**.



Integrity in Action

Q I am attending an out-of-town industry conference through Friday, but my flight home isn't until Saturday. A potential vendor has invited me to an exclusive resort for a round of golf on Saturday before I leave. Since this will be on my time, is it okay to accept?

A 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, you should decline. If you have further concerns, report them your manager, the **Compliance Committee**, or another **Speak Up** resource.





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Third-Party Relationships

We are truthful and transparent, and our actions align 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 always conduct business within the guidelines of Donaldson's [Supplier Code of Conduct](#).

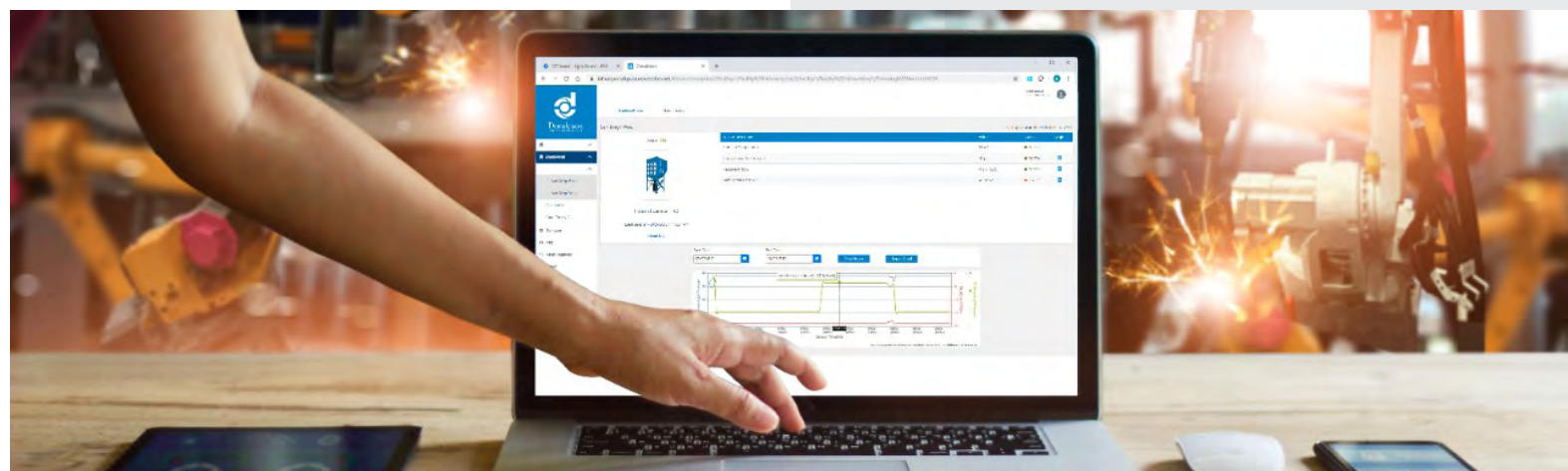
We make purchasing decisions in the same manner. We make our choices based on the best interests of Donaldson, regardless of the manufacturer or provider.



Integrity in Action

Q I recently discovered that one of our distributors was alleged to have committed bribery last year. The distributor did not mention this during a due diligence assessment this year. What should I do?

A Immediately report your concerns to your manager, the [Compliance Committee](#), or another [Speak Up](#) resource. In cases of misrepresentation, the necessary steps will be taken to terminate the contract for cause.





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Working with the Government

We conduct all our interactions with government employees fairly and honestly. 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 carefully follow all the terms of any government contract.

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.

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.



Integrity in Action

Q We are negotiating an international contract. I heard that by paying a few unofficial “fees,” the contract will be approved faster. Should I do it?

A No. We don't make payments that could improperly influence a government decision. You should contact your manager, the [Compliance Committee](#), or another [Speak Up](#) resource for guidance.





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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.

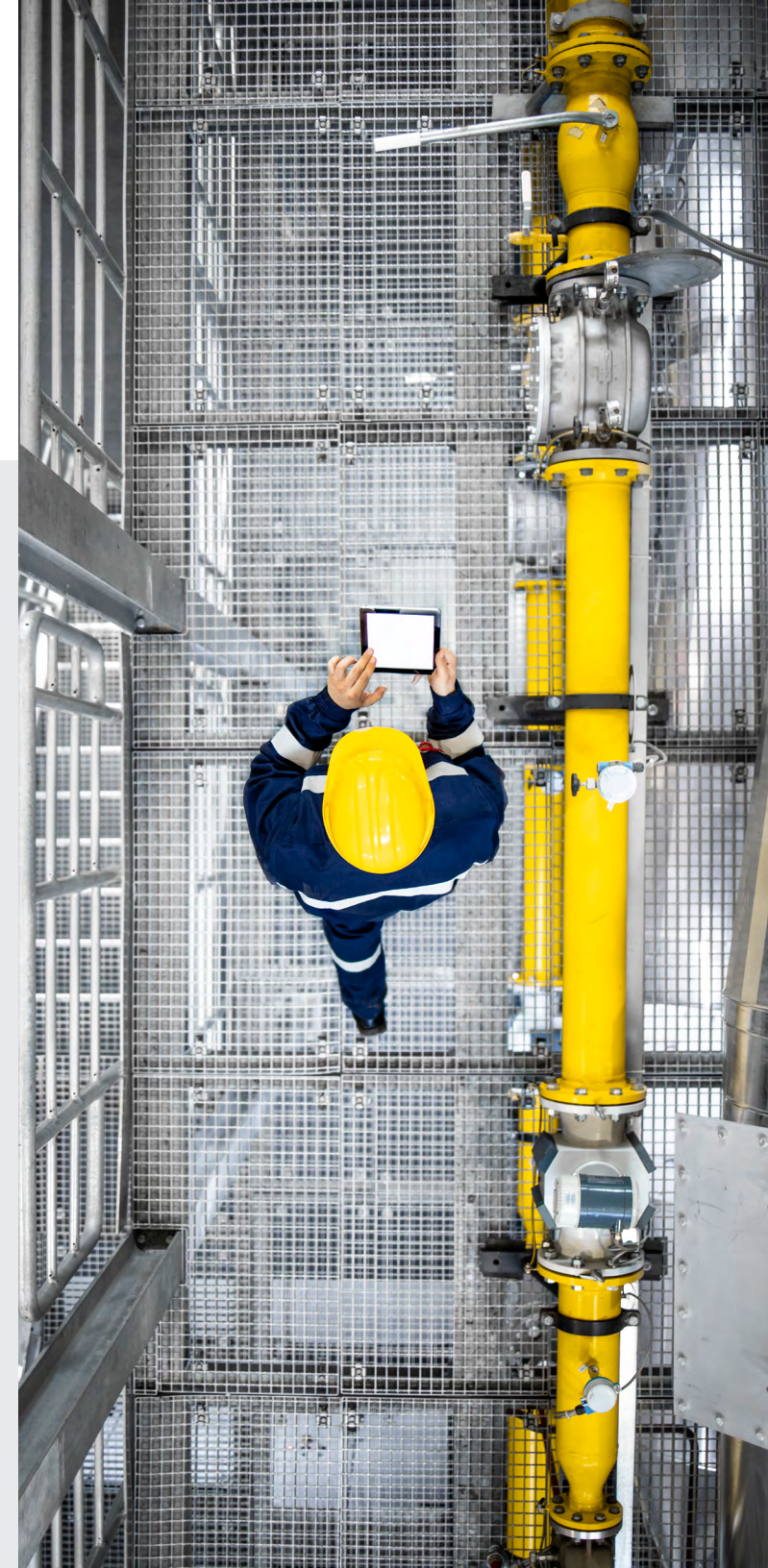
All policies, procedures, and laws must be followed when accessing, collecting, using, transmitting, and destroying employee data.



Integrity in Action

Q I received a call from an individual outside the company asking for my employees' start dates, titles, and base salaries. She told me that she is working with Human Resources on a benchmarking project and that it was urgent. What should I do?

A Information about our employees is confidential and should only be given to those who are authorized to have this information. In this situation, do not respond to the individual but report the request to your manager, the [Compliance Committee](#), or another [Speak Up](#) resource.





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WE ARE RESPONSIBLE

THE WORK WE DO MAKES A DIFFERENCE, SO
WE TAKE OUR RESPONSIBILITIES SERIOUSLY.



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Company Assets

Assets are the tools we use to do our jobs and do them right. So we all have a part to play in protecting our assets from waste, loss, theft, and misuse. Our assets include an array of physical and non-physical items, including:

- 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.



Customer and Partner 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.



Integrity in Action

Q I received an email from a competitor that was not intended for me. As I began reading, I realized it contained sensitive pricing strategies ahead of an upcoming bid. This information could benefit us – what should I do?

A Treat the information as confidential and stop reading the email as soon as you realize it was sent in error. Immediately notify the [Legal Department](#) of the situation and inform the sender of the mistake. Make it clear that you did not continue reading the email and will not use the information in any way. You should also delete the email from your system. It's important to maintain ethical standards and avoid any actions that could be viewed as unfair competitive practices.



Confidential Information and Intellectual Property

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.

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

We also protect our information by being thoughtful in our use of artificial intelligence (AI). Limited use of generative AI tools is permitted for performing work for Donaldson only with the approval of your manager. If you are authorized to use AI, only use approved applications and never input confidential information or intellectual property into public AI tools. And always check the results AI produces to ensure the outcomes are accurate and free of bias. Refer to our [Use of Generative AI Tools policy](#) for more details.



Integrity in Action

Q One of my new team members used to work for one of our competitors and offered to share some pricing strategies developed by their former employer. That’s great – it could give us an edge over our competitor, right?

A No. We earn business the right way. It’s okay for your team member to apply the general knowledge and skills learned in their previous work. But information that’s proprietary to the company would violate your team member’s obligations, our policies, and possibly the law. Your team member is obliged to protect confidential information about their former employer – just as you would have a responsibility to protect our confidential information should you ever leave.

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



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Delivering 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 [OneBlue Quality site](#).



Integrity in Action

Q A coworker suggested I modify product dimensional inspection results to values that would show the product meets drawing specifications/tolerances. It is only a small adjustment but is different than the actual inspection results. My coworker says it probably would not impact the functionality of the part. Should I follow their suggestion?

A No. Part of how we deliver quality is by being thorough and accurate in our inspections. If you suspect proper inspection procedures are not being followed, report your concerns to your manager, the [Compliance Committee](#), or another [Speak Up](#) resource.



Accurate Recordkeeping and Financial Reporting

Our records help us track the incredible work we do and guide our decisions going forward. That is why 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. Review records regularly and look for signs of fraud such as:

- **False entries**
- **Unrecorded funds or payments**
- **Omissions**
- **Misleading statements**
- **Alterations**

We manage existing records with care. Follow established policies and procedures for storing, retaining, and disposing of records. Give special consideration to documents that are subject to legal holds and retain them in a secure place, and never dispose of these records unless authorized.



INTEGRITY
COMMITMENT
RESPECT
INNOVATION



Integrity in Action

Q I am responsible for approving expenses from numerous employees who report to me. Do I need to review each expense, or can I trust that the expenses are legitimate and accurate?

A You should review each expense and attached receipts to determine whether it is legitimate, accurately recorded, and appropriately supported. If an expense appears unusual in any way, seek clarification from the employee. Approving expense reports without reviewing them implies that you agree with the information provided and could implicate you in falsifying records.



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Speaking on Behalf of Donaldson

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
 - Never reveal confidential information
 - Seek approval before speaking at public events or to the media about your role at Donaldson
 - Follow our [Public Communications Policy](#)

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.



Integrity in Action

Q I was recently invited to participate in a speaking engagement on behalf of our company. I am not a designated spokesperson. Is this okay?

A Perhaps. There are certain public and media relations opportunities (e.g., speaking engagements and published articles) where your participation as an employee may be encouraged. However, you must get approval from your manager and [Corporate Communications](#) before agreeing to participate.





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Social Media

We are thoughtful and respectful with how we communicate online. Social media posts can quickly take on a life of their own and have the potential to damage our well-earned reputation and compromise private information. When using social media, keep these best practices in mind:

- **Never disparage competitors or make inaccurate claims**
- **Do not present yourself as speaking on behalf of Donaldson unless authorized**
- **Be respectful and remember that our Code and our policies apply online**
- **Do not create or develop social media accounts or profiles bearing Donaldson's name without prior approval from [Corporate Communications](#)**
- **Avoid engaging in behavior that could raise actual or apparent conflicts of interest and conflicts of commitment on social networks**
- **Do not conduct business using social media**
- **Maintain the confidentiality of proprietary or protected information**
- **Be respectful of intellectual property rights and laws**
- **When engaging on social media on Donaldson's behalf, do not express political opinions or engage in political activities**
- **Exercise good judgment**
- **Remember that you are representing Donaldson**

Always use sound judgment online and follow our [Social Media guidelines](#). Remember that no matter what platform or app you use, posts and messages can last indefinitely.



Integrity in Action

Q I am a new area manager, and I want to create social media accounts to communicate with current and potential customers. Can I do this?

A While we fully support active customer engagement, we must not create social media accounts unless we have first received express permission from [Corporate Communications](#) and the applicable business division.





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RESOURCES

WE DO WHAT'S RIGHT

**WE ALWAYS DO THE RIGHT THING FOR
OUR CUSTOMERS, OUR PARTNERS,
OUR INDUSTRY, AND OURSELVES.**



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Customer Relationships

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.

This means taking an approach to marketing our products and services that reflects our commitment to acting with integrity and delivering for our customers. We communicate openly and honestly, back up the claims we make, and make sure everything Donaldson says is truthful.

We treat our customers the same way we'd want to be treated.

We practice truth in marketing and advertising by:

- **Following all relevant laws and regulations**
- **Never making false claims about our products and services**
- **Refusing to make promises we can't deliver on**
- **Never lying about or defaming our competitors**



Integrity in Action

Q While attending a customer meeting with another Donaldson employee, my colleague made what I believe to be an intentionally false statement about our capabilities. What should I do?

A Correct the error during the meeting if possible. If that is not possible, report your concerns to your manager, the [Compliance Committee](#), or another [Speak Up](#) resource. This will ensure that the company corrects any customer misperception.





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Anti-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.

INTEGRITY
COMMITMENT
RESPECT
INNOVATION

Our Code Defined: “**Anything of value**” includes cash, cash equivalents (such as gift cards), charitable donations, loans, gifts, favors, entertainment, and opportunities.

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.



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Trade Compliance

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.

Global trade is also highly susceptible to money laundering. When conducting international transactions, maintain complete and accurate records and be on the lookout for suspicious requests such as:

- **Sending payments to personal accounts rather than business accounts**
- **Conducting transactions through third parties with no logical connection to our business or supply chain**
- **Altering records or doing things “off the books”**

Our Code Defined: “Money laundering” is an attempt to mask the proceeds of criminal activity as legitimate business revenues.



Integrity in Action

Q I have a long-standing relationship with a customer who has always been a good partner. Recently, I noticed their “ship to” address has changed to a new entity that may be linked to a target of U.S. government-imposed trade prohibitions. Should I continue doing business with them, since nothing abnormal appears on paper?

A No. U.S. law prohibits any company-owned or -controlled entity from conducting business with entities or individuals associated with sanctioned countries or parties, even if the transaction is routed through a third party or neutral country. It is critical to avoid any potential violations of trade laws. If you observe any suspicious changes or behaviors, immediately contact the [Compliance Committee](#) or [Trade Compliance](#) for guidance. Continuing business without addressing this concern could expose our company to serious legal and financial risks.



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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. These policies also apply to trading in another company's securities while you are aware of material, nonpublic information about that other company that was obtained in the course of your service to Donaldson, as well as tipping that information.

Designated persons, including all members of the board of directors and certain officers and other employees, are subject to additional restrictions, including trading window periods and a requirement to receive pre-approval of the Chief Legal Officer before engaging in transactions in company shares. We must avoid even the appearance of an improper transaction to preserve our company's reputation and avoid serious legal consequences.

Consult our [Securities Trading and Information Disclosure Policy](#) for details on insider trading restrictions and policies. If you have any questions or concerns about insider trading, contact the Chief Legal Officer.



Integrity in Action

Q I overheard a conversation at work about a possible acquisition. Since I don't have confirmation that this is happening, is it okay to buy shares in the other company?

A No. It doesn't matter that you don't have confirmation. What you heard is still inside information. Don't trade on it or tip anyone else to trade. You could face harsh legal penalties.

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 pricing plans, or other significant business transactions.



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Fair Competition

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](#).



Integrity in Action

Q I am attending a trade association meeting later this year, and I expect that peers from several of our competitors will be in attendance. Am I permitted to speak with them?

A Conversations with competitors may be permissible so long as those conversations do not pertain to our business operations or involve sensitive or proprietary information. If a competitor tries to discuss things like pricing, territories, new products, or other competitive or sensitive information, you should stop the discussion immediately and report the incident to your manager, the [Compliance Committee](#), or another [Speak Up](#) resource.

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.





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RESOURCES

WE ARE GOOD STEWARDS

**WE HAVE AN OBLIGATION TO GIVE BACK
TO OUR PLANET AND OUR COMMUNITIES.**



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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 **Forced Labor Policy**, **Global Human Rights Policy**, **California's Transparency in Supply Chains Act of 2010**, the **UK Modern Slavery Act**, and other [applicable laws](#).



Integrity in Action

Q When I was visiting a new supplier, I noticed several employees working there who seemed underage. When I asked about it, I did not get a clear answer. What are my next steps?

A You did the right thing – first, to be on the lookout for human rights abuses and second, to raise the issue with our supplier. The next step is to report your concerns to your manager, the [Compliance Committee](#), or another [Speak Up](#) resource. We are committed to human rights and to the elimination of human rights abuses, including child labor.





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Community Involvement

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 value) require prior written approval from the regional or functional vice president and the Compliance Committee. Requests for approval can be made through our [disclosure management site](#).





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Political Activities

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.



Integrity in Action

Q I have decided to run for a local school board seat. Is there a problem with this?

A No, as long as your work for the school board does not interfere with your job here. However, use of company property and resources for personal political campaigning is strictly prohibited.

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





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Safeguarding 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.

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



Integrity in Action

Q I read an article online that mentioned that one of our new suppliers was not disposing of hazardous waste properly. I am a little concerned, but I am not sure it is really any of our business. Should I tell someone?

A Yes. We expect everyone we do business with to uphold our high standards. If our suppliers act in ways that violate our commitment to protecting the environment, it becomes our concern too. Report your concerns to your manager, the [Compliance Committee](#), or another [Speak Up](#) resource.

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.



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Closing Thoughts

Donaldson has come a long way since our founding. Frank Donaldson's original 1915 filter is a museum piece now. But his way of working, his way of innovating, and his way of serving customers lives on in the work we do every day. The filters we make today may very well be obsolete 100 years from now. But if we do our jobs right and we do them well, our legacy will live on.

Our work isn't always easy or straightforward. But when we stick to our Code and live by Donaldson's principles and purpose, the right way forward will always remain clear.





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Helpful Resources

If you ever need guidance, these Donaldson resources are here to help:



To ask questions, speak up about potential misconduct, or raise other ethical concerns:

- Your manager
- Any other manager
- Human Resources
- Compliance Committee
- Legal Department
- Internal Audit

Or contact Donaldson's Business Conduct Help Line:

Available 24 hours a day, 7 days a week

Visit donaldson.ethicspoint.com to file a report or find the toll-free telephone number for your region.



For information about company benefits:
Human Resources



For questions about our policies or the law:
Legal Department



For media inquiries:
Corporate Communications



For environmental and sustainability questions:
Global Sustainability



If you have a question about our Code of Conduct, please contact the
Compliance Committee.

Donaldson reserves the right to modify this Code at any time, as necessary, along with our policies, procedures, and conditions of employment. The Code is not intended as a contract or guarantee of employment.

Donaldson also supports an employee's right to speak out publicly about matters of public concern and to participate in concerted activities and communications related to terms and conditions of employment. Nothing in any section of our Code or in any of our policies is intended to limit or interfere with that right. That includes activities protected under Section 7 of the U.S. National Labor Relations Act, such as discussions related to wages, hours, working conditions, health hazards, and safety issues.



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ACT WITH INTEGRITY

JUNE 2025

