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# Code of Conduct

# Success through integrity

## Hear it. See it. Report it.

**Integrity starts with you.** Our Company relies on you to speak up when anyone at Roper or doing business with Roper fails to meet our standards of conduct or comply with applicable laws.

**Speak up. We are listening.** Ask questions and raise concerns in person, by email, through the website, or by phone. You can remain anonymous when reporting to the Roper Technologies Ethics and Compliance Line.

**If it feels wrong, it probably is.** All Roper Employees and Directors must follow this Code and are encouraged to ask questions or address concerns regarding the best course of action.

**Your voice. Our values.** Employees must acknowledge receipt of this Code at the time they join the Company and must annually acknowledge their continuing commitment to the Code. Directors must acknowledge receipt of this Code at the time they are elected to the Board and must **annually** acknowledge their continuing commitment to the Code.

**No silence on ethics.** Waivers of the Code for corporate Executive Officers or Directors may be made only by the Board of Directors and will be promptly disclosed as required by the Securities and Exchange Commission ("SEC"), stock exchange, or other applicable rules or regulations. The Compliance Officer must approve any waivers of the Code for other Employees in writing. Requests for such waivers should be directed, in writing, to the Compliance Officer.



## Contact options

- Talk to your supervisor, manager, Roper Human Resources, or your Human Resources
- Talk to the Compliance Officer, +1 (941) 556-2663
- Email the Compliance Officer at [ethics@ropertech.com](mailto:ethics@ropertech.com)
- Use the Ethics and Compliance Line
  - Access all country numbers at <https://www.ropertech.com/code-of-ethics/>
  - Submit online at [www.roper.ethicspoint.com](http://www.roper.ethicspoint.com)



# Message from Neil Hunn

## Dear Colleagues,

At Roper, our diverse talents, ingenuity, and capacity to innovate will position us for many great opportunities ahead. With opportunity comes responsibility, and our business reputation depends upon us doing the right thing, not just some of the time, but all the time.

We are incredibly proud of the long-term success of our businesses. Success, especially long-term success, must be supported by a commitment to the highest integrity and mutual respect for each other, our customers, and other stakeholders. As the next great technology revolution, led by artificial intelligence, is now quickly unfolding, it remains as important as ever to ensure we operate in an ethical and responsible manner.

To this end, our Code of Conduct outlines a model for the high ethical standards and commitment to integrity that we expect from everyone at our Company. Understanding our Code and incorporating its components into your decision-making will help maintain the vital trust we have established with our customers and with our fellow employees.

I want to thank each of you for carefully reading, understanding, and actively applying our Code of Conduct. Continuing the exceptional legacy of outstanding business ethics will be a critical element in the future success of Roper.

I appreciate your commitment to our culture of trust and mutual respect as you engage with your colleagues and your customers that enable you to do your very best work!

Sincerely,



**Neil Hunn**  
President and Chief Executive Officer



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# Speaking Up

*Courage to speak. Power to change.*



What we need from you:

- Read this Code
- Follow the spirit and letter of the law in all aspects of our business
- Think before you act
- Provide full and honest disclosure in any Roper public filing
- Promptly report any violations of this Code or applicable law
- Cooperate fully in any internal or external investigations

## *Reporting violations and concerns*

**We must report all inappropriate, unethical, or illegal conduct or behavior in violation of this Code, the law, or other Company policies.**

Remember:

- ✓ You can report in person, by email, through the website, or by phone
- ✓ You can choose to report anonymously when making a report to our Ethics and Compliance Line on [www.ropertech.com/ethics](http://www.ropertech.com/ethics)

**Q:**

A couple of my team members often joke around with each other using graphic language and sexual innuendos that are easily overheard, and this makes me very uncomfortable. Do I still have reason to be bothered even though they are not saying these things directly to me?

**A:**

Yes, being exposed to inappropriate behavior, even indirectly, is not acceptable in our work environment. You should report the team members' behavior to your supervisor, your HR representative, or contact the Compliance Officer or the Ethics and Compliance Line.

## No retaliation, ever

**Everyone should feel comfortable reporting possible violations of this Code of Conduct, any Roper policy, or the law.** The Company will not tolerate any negative employment action taken against someone because the individual has made a report in good faith or is going to make a report in the future.

Making a report in good faith does not mean you have to be certain that something unethical or illegal is happening—it just means that you have a genuine reason to believe something could be wrong.

## Understanding investigations of your reports

Any report of concerns contemplated by this Code will be kept confidential to the extent practicable or allowed by law. However, you should be aware that there are certain situations that may require disclosure of confidential information to reach a resolution.

The Company will take appropriate disciplinary action against any Employee or Director whose actions are found to violate this Code or Company policies or procedures or who has otherwise acted improperly or unlawfully. **Disciplinary actions can result in termination of employment. This applies to all Employees, regardless of position.**

It's important to keep in mind violations of legal and regulatory requirements can carry their own civil and criminal penalties, including fines and imprisonment. The Company will cooperate with appropriate authorities when laws have been violated.

Q:

**A supervisor has made inappropriate comments to me that I have only been recently promoted because I am a woman. I reported him to the Compliance Officer, but now I am worried that I will be demoted because I reported him. What do I do?**

A:

**The company prohibits retaliation against anyone who reports in good faith a potential violation. Retaliations can include demotions and other actions that adversely affect an employee's job performance, working conditions, or career opportunity. If you believe you are a victim or witness of retaliation, you must report it immediately to the Compliance Officer or Ethics and Compliance Line.**



## Our Compliance Officer

Our Compliance Officer is responsible for administering the implementation and execution of this Code, including:

- Overseeing the implementation of the Code and related policies, practices, and procedures
- Overseeing administration of, and compliance with, the Code, including enforcement and ensuring that appropriate disciplinary measures are applied
- Conducting or overseeing investigations into reported violations of the Code
- Coordinating appropriate responses to misconduct and taking action designed to prevent a recurrence of any misconduct
- Coordinating any necessary training programs on topics covered by the Code, and
- Answering questions and providing guidance to Employees and Directors regarding the Code

**You can contact the Compliance Officer in person, by telephone at +1 941 556-2663, or by email at [ethics@ropertech.com](mailto:ethics@ropertech.com).**



# Integrity within the Company workplace

## Protecting health and safety

We must comply with all applicable workplace health and safety rules, laws, and regulations. If your position requires compliance with any workplace safety and health requirements, you must be provided with the appropriate training.

Threats or acts of violence will not be tolerated and must be reported immediately. For additional information, please refer to Roper's Environment, Health and Safety Policy at <https://www.ropertech.com/policies/>.

## Preventing discrimination and harassment

Discrimination on the basis of race, color, age, national origin, citizenship, sex (including pregnancy, childbirth, or related conditions, transgender status, and sexual orientation), religion, disability, veteran status, genetic information, or any other characteristic protected by law is strictly prohibited.

Harassment of any kind, including verbal or physical abuse, or intimidation of any person because of race, color, age, national origin, citizenship, sex (including pregnancy, childbirth, or related conditions), religion, disability, veteran status, genetic information, or any other characteristic protected by law is expressly prohibited. **Any such harassment, disparaging comments, or insults will not be tolerated.**

Harassment can take many forms, including unwelcome verbal or physical contact, written communication, or repeated misconduct that a reasonable person would see as offensive. Bullying and harassment of any type, whether sexual in nature or not, is a violation of our policies. **It does not matter whether you intend to offend someone, it can still be harassment.**

Q:

**I overheard a coworker say that he won't put women with children on certain assignments because they don't like to travel. Should I report this?**

A:

**Yes, the Company prohibits discrimination and taking actions that adversely impact an employee's career opportunities based on their sex. If you believe staffing decisions are being made on the basis of sex you must immediately report it to your HR leader, the Compliance Officer, or Ethics and Compliance Line.**

## Protecting employee personal privacy

Our Company must protect confidential information regarding employee background, family, income, contributions, and health information. Employees with access to employee personal information should maintain its confidentiality, and access and use the information only for the purpose for which it was collected and in compliance with applicable laws, rules, and regulations. Unless required by law, you are not authorized to disclose any employee personal information to anyone outside of our Company, except on a demonstrated need-to-know basis. When employee data needs to be shared with third parties (including service providers offering SaaS or artificial intelligence services), obtain approval from the appropriate leadership, cybersecurity, and legal teams.

## Avoiding substance abuse

Substance abuse and misuse are unacceptable whether on company premises or elsewhere, including during work hours or at after-hours events with Company employees. Employees should report to work and work-adjacent events in condition to perform their duties, free from the influence of illegal or unauthorized drugs, marijuana, or alcohol. In addition, the use, possession, or distribution of illegal or unauthorized drugs on Company time or Company premises is strictly prohibited.

## Respecting labor representation

The Company recognizes that issues involving union or works council representation must be resolved within the framework of law, on a unit-by-unit basis. Therefore, where collective representation exists, the Company will strive to build a relationship with those representative organizations based on the principles of good faith and mutual respect. The Company is committed to complying with all applicable laws, rules, and regulations governing employment, immigration, and labor relations, including working hours and fair wages.

Q:

**My supervisor gets very drunk during dinners after company meetings. Can I still report him even though it does not happen during work hours?**

A:

**Yes, you should report your supervisor. Employees should be mindful of their alcohol consumption during company events and at any time where other company employees are present.**

# Integrity within our business

## Protecting our information

### Confidential information is:

- ✓ not generally known by the public
- ✓ might be of use to competitors if disclosed, or
- ✓ harmful to the Company (or its customers or business partners) if disclosed

We must maintain the confidentiality of all confidential information entrusted to us by our employees, vendors, customers (including our customers' customers), as well as any other companies with whom we engage on a confidential basis (including joint ventures, joint bids, or acquiring/selling securities or assets, etc.). We need to be particularly careful to maintain the confidentiality of any material, non-public information.

### “Material Information” is information that a reasonable investor would:

- ✓ consider important in deciding whether to buy or sell Roper's securities or
- ✓ view as having significantly altered the total mix of available information about Roper's securities

### Examples of information that is “material”:

- ✓ Roper's financial condition or results of operations (such as earnings), including changes in previously disclosed financial information
- ✓ Financial forecasts, especially earnings estimates
- ✓ Plans for declarations of stock splits or dividends or increases or decreases in dividends

- ✓ Mergers, acquisitions, tender offers or divestitures, or the purchase or sale of substantial assets
- ✓ Significant changes in operations, executive leadership, or significant new products to be introduced
- ✓ Proposed new issuances of securities or extraordinary borrowings or debt payments
- ✓ Significant litigation developments
- ✓ Governmental investigations, criminal actions or indictments, any collateral consequences, including potential debarment from government contracts and any other significant governmental actions

### Restricting access to confidential information.

Access to material non-public information (including information processed on behalf of our customers) is restricted to Company personnel on a “need-to-know” basis. This means that every reasonable effort needs to be taken to limit the number of Company personnel becoming aware of the information. If you are required to share non-public information with third parties (including SaaS and artificial intelligence service providers), you should ensure that appropriate legal and technical protections are in place to protect the confidentiality and use of that information (e.g., NDAs, security agreements, etc.).

In the new technology age of artificial intelligence, we at Roper need to be extra mindful of what information is being accessed by artificial intelligence, whether we have the rights to that information, what (if any) rights to the information we are granting to third parties through the use of artificial intelligence, and be extra cautious when proceeding with same. We should not share any confidential information with third-party artificial intelligence without the appropriate legal and technical protections in place to protect it.

### Protecting customer information.

With Roper's increased focus on the provision of SaaS products and other cloud-based services, our customers increasingly trust us to protect their data. Any Customer data should be treated as Confidential Information, and we should ensure appropriate protections are in place before taking any action that could result in its disclosure.

### Avoiding disclosure of non-public information.

Generally, only Roper senior management should disclose non-public information. You must maintain confidentiality of non-public information regardless of whether public disclosure has occurred or you believe it has occurred, except where the disclosure is expressly authorized, permitted, or required by law.

If you are contacted by anyone outside of the Company to discuss confidential information, **do not disclose any confidential information** and please refer the individual to the appropriate Roper management associate. Other than on the "need-to-know" basis, no disclosure will be made without the prior approval of Roper's General Counsel or other appropriate management.

## Avoiding conflicts of interest

We must avoid actions that conflict, or appear to conflict, with the Company's best interests.

### Conflicts of interest can include:

- ✓ Representing the Company in dealings in which that individual has a vested interest
- ✓ Soliciting personal favors from those with whom the Company does business
- ✓ Working for or providing advice or consulting services to a competitor, supplier, or customer of the Company
- ✓ Running a business that competes with the Company or taking a position that interferes with one's duties to the Company
- ✓ Becoming a director or officer of or having a financial interest in a company with whom Roper does business or competes, and
- ✓ Other circumstances in which the person's loyalty to the Company would be divided

**Q:**

**I'd like to take a part-time job. A coworker said that the Company will need to review and approve the request from me. Is that true? What steps do I need to take before accepting the job?**

**A:**

**Yes, the Company will need to conduct a conflict-of-interest check. We need to know that your part-time work will not affect the Company's business interests (i.e., you will not be working with a competitor or customer), that no Company resources will be used during your second job, and that the new job will not interfere with your work at the Company. You can initiate the conflict-of-interest check by contacting your supervisor or local HR specialist.**



### Disclosure of conflicts of interest

Each employee must promptly disclose their actual or potential conflicts of interest to their supervisor, hiring manager, or local Human Resources. Executive team members must disclose their actual or potential conflicts of interest to the Roper Group Vice President. Conflicts of interest must be avoided unless approved by the Compliance Officer or Roper's General Counsel. Corporate Executive Officers and Directors should disclose actual or potential conflicts of interest to the Chair of the Corporate Nominating and Governance Committee of Roper's Board of Directors. The Committee shall then determine what, if any, action may be appropriate in response.

### Loans and outside work

Loans from Roper to Directors and Corporate Executive Officers are not permitted. Loans from Roper to any other Employees must be approved in advance by the Board of Directors or its designated committee or Corporate Executive Officer.

Without prior approval of the Compliance Officer, employees may not perform outside work for other parties or solicit such business on Company premises or Company time. Neither are they permitted to use Company equipment, telephones, materials, resources, or proprietary information for any outside work.

### Significant personal relationships

Personal relationships in the workplace can present a real or perceived conflict of interest when one individual in the relationship makes or influences employment decisions regarding the other, including performance, opportunities, or compensation.

Significant personal relationships include, but are not limited to, spouses, domestic partners, family members, dating or physical relationships, close friends, and business relationships outside of the Company.

Do not use your position at the Company to obtain favored treatment for yourself, family members, or others with whom you have a personal relationship. You should not allow any relationship to disrupt the workplace or interfere with your work or judgment.



**I have a niece who just graduated from college and applied for a position at my company. If we hired her, she would not report to me. Can I recommend her for the position?**



**Yes, you can recommend her for a position. However, to avoid the appearance of anything improper, you must disclose your relationship to the hiring manager. You should also not participate or intervene in the hiring process to ensure she is evaluated solely on her own merits.**

You must promptly disclose all of your personal relationships to your supervisor, hiring manager, or local Human Resources. Executive team members must disclose these personal relationships to the Roper Group Vice President and obtain approval prior to hiring anyone with whom they have a significant personal relationship.

## Avoiding improper corporate opportunities

**Employees and Directors owe a duty to the Company to advance the Company's legitimate interests. No Employee or Director may:**

- ✗ Take for themselves, or help others take for their benefit, a business opportunity that is discovered through the use of Company property, information, or position
- ✗ Use the Company's name, property, information, or position for personal profit, gain, or advantage (other than compensation from the Company), or
- ✗ Compete with the Company

## Protecting corporate assets

We all have a duty to protect the Company's trade secrets, business data, and proprietary know-how against industrial espionage. We also have a duty to safeguard the Company's assets against theft, loss, or misuse.

**Assets can include:**

- Intangible assets (e.g., customer lists, manufacturing processes, engineering drawings and specifications, software code, software proprietary configurations, intellectual property and a variety of information in written or digitally stored form)
- Tangible assets (e.g., money, equipment, supplies, facilities, inventory, and materials)

**Company resources, including assets and personnel time, must not be diverted for unauthorized uses.**

- Every Employee with access to company money—including company paid credit cards—or property has an absolute responsibility to manage it with the utmost level of integrity and to avoid any misuse of such assets
- Fraud, theft, embezzlement, or other improper means of obtaining corporate funds by Company personnel are unethical, illegal, and completely unacceptable
- Unless specifically authorized, you may not misuse or remove from Company facilities any company property (e.g., furnishings, equipment, computer equipment, networking equipment, supplies, as well as property created, obtained, or copied by the Company for its exclusive use such as files, reference materials and reports, software, applications, and databases)
- The integrity of Company software and applications and data must not be compromised, and you must exercise great care in protecting these assets against intentional or unintentional corruption
- The Company's products and services are its property, and contributions an Employee makes to the development and implementation of such while employed by Roper are company property and remain company property even if employment is terminated

**It is important that we prevent theft or misappropriation of company property by taking continual care to limit such losses by normal precautions and by handling company assets in a prudent manner. Safeguard company property by:**

- ✓ Following Cybersecurity policies and procedures and storing Confidential Information only on approved systems
- ✓ Locking up equipment, supplies, and materials when not in use
- ✓ Preventing unauthorized individuals from accessing corporate assets
- ✓ Protecting user IDs and passwords confidentiality
- ✓ Being alert to phishing scams, suspicious links, and other attempts to obtain sensitive personal or corporate information
- ✓ Recognizing that bad actors continuously attempt to deceive company employees and fraudulently obtain company property (such as company funds through false pretenses), including the infiltration of a company through employment
- ✓ Reporting suspicious persons, requests, or activities to security personnel
- ✓ Refraining from downloading unauthorized applications or software, and
- ✓ Avoiding discussions of sensitive or confidential company information in the presence of unauthorized persons (i.e., hallways, elevators, restaurants, or social media platforms)

## Protecting our assets through cyber defense

We must ensure our ability to conduct business in the face of cyberattacks by maintaining good cyber hygiene.

**Maintaining good cyber hygiene means that we:**

- ✓ Think before we click, open, and respond to suspicious links, attachments, and emails
- ✓ Never bypass security controls
- ✓ Ensure that our workstations, servers, software, and network devices are patched as quickly as possible
- ✓ Backup business critical data using a ransomware resilient method
- ✓ Choose strong passwords, enable multi-factor authentication and never share your credentials with others, and
- ✓ Promptly report any suspicious activity

In order to protect our company and when not prohibited by applicable law at any and all times, we may monitor your telephone conversations, electronic mail/transmissions, or internet access/usage using any lawful means when you are using a telephone, electronic device, or system provided, controlled, or otherwise managed by Roper.



**I accidentally clicked on an email attachment from an unknown source, and I think my laptop is now compromised. I am too embarrassed to report it. What should I do?**



**Cyberattacks happen daily and should be reported immediately to your Cyber department. The quicker they are notified, the more likely impact can be limited. Embarrassment aside, it is important that any suspected security breach be addressed as soon as possible.**

## Maintaining records

All Employees and Directors are required to cooperate fully with any appropriately authorized internal or external investigation, including violations of this Code and pending litigation. If you are requested to preserve documents in accordance with an investigation or legal hold, you must fully comply, and should never withhold, tamper with, destroy, or fail to communicate relevant information.

When information is not subject to a hold, Employees and Directors should also comply with all applicable document retention policies. Employees and Directors should ensure that any documents of record are stored appropriately, and otherwise documents should be archived/destroyed in a manner consistent with the document retention rules.

## Protecting our intellectual property

Proprietary Information includes processes, data, know-how, trade secrets, formulae, improvements, production techniques, software and applications, and vendor and customer contract information and lists.

Employees may not disclose to unauthorized individuals (inside or outside of the Company) any information that would tend to compromise proprietary technologies or trade operating secrets. Reasonable precautions should always be taken to prevent the inadvertent disclosure of such information. **This confidentiality of company information applies even after the individual has left the employment of the Company.**

## Ensuring accuracy of corporate records and reporting

All of our Employees generate records as part of their regular tasks, and it is crucial that all Company Employees make only true and accurate statements and representations. This applies not only to Company records, but also to government agencies, suppliers, customers, the press, and the general public.

Every Employee involved in creating, transmitting or entering information into the Company's financial and operational records (including time sheets, sales records, and expense accounts) is responsible and must take care to do so completely, honestly, and accurately.

### Employee expense reports

Only acceptable business expenses may be submitted in your expense reports. This means you may not submit expense requests for: personal expenses, meals not eaten, miles not driven, airline tickets not used, or for any other expense not incurred which is dishonest reporting and is prohibited.

## Accounting controls

All transactions must be properly and accurately recorded in Roper's books and records, in compliance with Generally Accepted Accounting Principles, Roper's internal control over financial reporting and other internal controls, and any other applicable Company policies and procedures.

No unrecorded bank accounts, corporate funds or assets may be maintained, and all entries made in any corporate books or records must be accurate and comply with Roper's policies and procedures. Furthermore, it is the responsibility of all Company Employees, within the scope of their employment duties, to ensure that all financial record keeping and records to governmental agencies be truthful and accurate.

## Documentation

Corporate funds may not be paid with the intent or understanding that any part of such payment is to be used for a purpose other than that described by the document supporting such payment.

Any documentation of corporate actions made should comply with reporting policies, procedures, and requirements of Roper and any applicable governmental agency providing oversight or having jurisdiction over such matters. Documentation should be accurate and retained as provided by statute, regulation, or instruction by such agencies.

**Employees are strictly prohibited from destroying, altering, or falsifying documents or records with the intent to impede, obstruct, or improperly influence the investigation or proper administration of any matter within the jurisdiction of any governmental department or agency.**

Q:

**My company paid for me to attend a conference. I brought my spouse with me and have been including her meals on my expense receipts. Is that allowed?**

A:

**No, while your meals are appropriate business expenses while you are on company business, your spouse's are not. You should only submit expenses for your own meals under these circumstances.**



## Preventing money laundering

Roper is committed to the prevention, detection, and reporting of money laundering and terrorist financing. Money laundering is the process of converting illegal proceeds so that funds are made to appear legitimate.

**Potential red flags for money laundering include, but are not limited to:**

- **Customers making payments through multiple accounts**
- **Requests for payments to be made to personal or offshore accounts rather than usual company accounts**
- **Requests for payments to be made at odd times or in unusual amounts, and**
- **Requests for numerous payments that are below \$10,000**

To protect our company, you must act diligently to prevent any Company products or services from being used to further money laundering. If you detect suspicious activity, promptly report it to your supervisor or the Compliance Officer.

## Reporting to the Securities and Exchange Commission (“SEC”)

As a public company, Roper is committed to full, fair, accurate, timely, and understandable disclosure in reports and documents that Roper files with, or submits to, the SEC. This also applies to Roper’s public communications made in compliance with SEC, stock exchange, or other applicable rules and regulations.

In support of this commitment, Roper has, among other measures, designed and implemented disclosure controls and procedures (within the meaning of applicable SEC rules), and Roper requires the maintenance of accurate and complete records, the prohibition of false, misleading, or artificial entries on its books and records, and the full and complete documentation and recording of transactions in Roper’s accounting records.

**If the scope of your employment involves the reporting of material information, you must be trained in these controls and procedures. All Employees are expected to report to their supervisor information they believe might be material about the Company, but which they believe may not be known at higher levels of the Company.**

# Integrity within the marketplace

## Preventing insider trading and tipping

**What are insider trading and tipping?** Insider trading is the purchase or sale of securities while aware of material, non-public information (See Confidential Information Section, Page 12 for more information on what is “material, non-public information”). Tipping is the disclosure of information to others who trade based on that information.

### How to avoid insider trading and tipping:

- ✗ **Do not engage in transactions in any securities,\* whether Roper’s or any other public companies’, while you’re in possession of material, non-public information**
- \*For purposes of this Code, “securities” includes options or derivative instruments with respect to such securities and other securities that are immediately convertible or exchangeable into such securities*
- ✗ **Do not communicate any material, non-public information to any person who may use that information to purchase or sell securities**
- ✗ **Observe these prohibitions even if you leave the Company**

## Fair dealing with customers, suppliers, and competitors

We should all strive to deal fairly with the Company’s customers, suppliers, and competitors. To that end, we must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice.

## Unfair competition—antitrust

Antitrust laws forbid understandings or agreements between competitors regarding prices, terms of sale, profits, division or allocation of customers, markets or territories, credit arrangements, methods of distribution, or any other activity that restrains competition. Information concerning competitor strategies and market conditions obtained from our customers or other sources is both legitimate and desirable.



**I am aware that the Company is about to select a business partner that will profit substantially from our business. Can I buy publicly traded stock issued by the business partner?**



**No. You are in possession of non-public information and should refrain from buying the business partner’s stock. When in doubt, contact the Compliance Officer.**

**However, you should NOT:**

- × **Ask customers to serve as an intermediary to communicate with our competitors**
- × **Obtain, accept, disclose, use, or suggest that you or the Company possess a competitor's trade secrets under improper or questionable circumstances—Trade secrets include any information, documents, or materials whose contents are not generally known, have not been disclosed by the owner, and are likely to be safeguarded by the owner**
- × **Attempt (directly or indirectly) to restrict any customer's or distributor's freedom to set their own prices for the resale of any Company product**

Further, any unnecessary contact with our Company's competitors should be avoided. As a general rule, contacts and communications with competitors should be limited to those which are inadvertent and unavoidable (like trade shows and certain outside seminars) and you should seek appropriate clearance from the Company's General Counsel before engaging in further contacts or communications.

Everyone must fully comply with the antitrust laws of the United States and the competition laws in every country in which Roper or its affiliates do business. Where U.S. laws concerning competition differ from local law, the more restrictive standard applies.

## Marketing: disparagement of competitors

All Roper businesses' advertising and marketing efforts must comply with all applicable governmental laws, rules, and regulations that prohibit unfair and deceptive trade practices. This includes any advertising and sales promotion policies.

It is our Company's policy to emphasize the quality of its products or services, and we should refrain from making unfounded disparaging comments about competitors or their products or services. Statements (oral or written) made concerning a competitor or its products or services must be fair, factual, and complete.



**A prospective customer contacts me to discuss a negative experience with a competitor and inquire about buying my company's product instead. Can I disparage the competitor with information that I have not fully vetted or confirmed?**



**No. It is better to avoid comments disparaging the competitor and instead focus on the quality of our Company's products and services to its customers.**

## Promoting product safety

We must only manufacture and promote products that can be operated and handled safely. Our Company's products must be tested to assure quality and safety standards are met. Additionally, our products must be accompanied by clear and relevant safety information and appropriate warnings and instructions regarding any reasonably foreseeable hazard that our products may pose to persons, property, or the environment.

**It is important to make sure that you do not authorize the shipment of products or the provision of services known to be defective, unsafe, or unsuited for its intended use.**

## Observing laws and standards for educational, medical and healthcare businesses

The Company follows all applicable laws and regulatory requirements for the development, manufacturing, distribution, and marketing of medical products as well as the handling of medical, educational, and healthcare information. Employees in these businesses must ensure compliance with all legal requirements, as well as product quality and safety standards and all other applicable obligations.

Interactions with healthcare professionals (or HCPs) are increasingly regulated. We are committed to ensuring our interactions with HCPs are ethical, informative, and supportive. There are many laws and regulations intended to protect against fraud, waste, and abuse in healthcare (e.g., Anti-Kickback Statute and Sunshine Act), and we are committed to complying with these laws by not offering things of value to improperly influence the decisions of HCPs and by properly reporting payments and other transfers of value to our customers in accordance with state and federal reporting and disclosure obligations.

If you work directly or indirectly with HCPs, such as dentists, hygienists, nurses, technicians, or other individuals involved in the delivery of clinical care to patients, always comply with our guidance on engaging with healthcare providers in all of your interactions with HCPs.

## Offering gifts, entertainment, or travel to customers

Attempting to improperly influence customer purchasing decisions through personal gifts, offers of entertainment (including meals and sporting events), travel, discounts, or special favors is improper, unacceptable, and in some instances unlawful. **Offering money, gifts, or other items of value to customers or prospective customers that may be construed as an attempt to improperly influence their relationship to the Company's business interests is strictly prohibited.**

Where consistent with local tradition or business practice, small gifts of nominal value can be presented so long as the cost for that gift is fully documented. In certain limited situations, gifts of more than nominal value involving travel or entertainment could be allowed upon receipt of your supervisor's or the Compliance Officer's prior written approval. A gift is never permitted if prohibited by law.

Gifts of cash or cash equivalents (such as gift cards) are never acceptable.

**If the gift involves a government or public official, it is crucial you obtain approval from the Compliance Officer and comply with the information provided in the "Avoiding Improper Relationships with Public Officials" section.**

## Accepting gifts from vendors and suppliers

Decisions about accepting gifts or entertainment from vendors or suppliers should be governed by local custom, discretion, and good judgment.

Business gifts may be accepted provided they are of nominal value (less than \$250 in fair market value) and include no cash or financial securities. In the case of meals, entertainment, lodgings, or offers of travel, the decision to accept should be guided by good judgment taking into account the principle of reciprocity, that is, whether the individual who received such an offer is in a position to give a similarly valued gift and expense its cost under the Company's normal expense account procedures.

**Q:**

**One of our suppliers sends my department a monthly gift basket. Is it OK for me to accept these baskets and distribute them to my team?**

**A:**

**You should seek guidance from your supervisor or the Compliance Officer prior to accepting. Unsolicited gifts may be acceptable provided they are not expensive, infrequent, and would be no more than a common courtesy. However, it's vital to avoid any perception of improper influence on your decision-making.**



# Integrity within our communities

## Avoiding improper relationships with public officials

Our Company strictly abides by all applicable anti-bribery and anti-corruption laws, including the Foreign Corrupt Practices Act (FCPA), state ethics laws, and the UK Bribery Act. The Company prohibits giving anything of value, including entertainment, payments or gifts, to any state, federal, or foreign governmental official for any reason whatsoever. This holds true both in the U.S. and abroad.

The proscriptions of the FCPA also extend to bribery of a “foreign political party or official thereof or any candidate for foreign political office.”

A third party cannot be used to try to hide a bribe. Suppliers, agents, distributors, and business partners cannot offer or receive a bribe related to working for the Company or on the Company’s behalf.

Our Company has developed policies, procedures, and internal controls for complying with anti-bribery and anti-corruption laws. Deviations from these policies should be considered and approved only on a case-by-case basis and only after referral to the Compliance Officer. In dealing with legislators, regulatory agencies, government field agents or other public officials, political parties, party officials or political candidates, Company personnel must:

**Remember, a bribe can take the form of money, gifts, services, or any other benefit.**

**If your personal safety, security, or freedom of movement is at risk, a payment may be made and then reported to the Compliance Officer or Roper’s General Counsel after the fact and must be properly reflected in the Company’s books and records.**

## Adhering to our policy regarding political contributions

The Company is committed to comply with any applicable laws regarding political contributions, including those in connection with elections. Company Employees and Directors are prohibited from conducting personal political activities using company time, property, or equipment.

For additional information, please refer to Roper’s U.S. Political Contributions Policy (available at <https://www.ropertech.com/policies/>) and obtain pre-approval for any support of any political cause or candidate.

## Interacting with the media

All inquiries from the news media should be referred to Roper’s Corporate Executive Officers. Unless you have been specifically authorized to do so, Employees and Directors are prohibited from accepting invitations to interview or discussing company affairs with any third party—including but not limited to securities analysts, market analysts or research providers, media representatives, government officials, pension plan or similar fund administrators, and other outside persons.

To ensure that all news released about the Company is accurate, timely, consistent, and in compliance with applicable legal requirements, such releases are the responsibility of Roper’s Chief Executive Officer, Chief Financial Officer, and Investor Relations leader.

## Using social media

**Think before you post.** We must be cognizant of the impact and unintended consequences that can result from our use of social media and communication via the Internet. The Company will not tolerate harassment or discrimination of any kind, even in your private social media accounts.

If your social media activity would violate any of the Company policies in person, it will also violate those policies in an online forum. For example, do not make unfounded disparaging comments online about competitors or their products or services. Excessive posting to or access of social media sites for personal reasons at work, or while using any of the Company’s communication systems, is not permitted. In addition, we must not make personal comments that could be interpreted as a comment or endorsement by Roper. **When posting online in any situation where you may be considered to be speaking for your company, you should add the following disclaimer: “The opinions expressed are my own and do not represent the views of my employer.” Moreover, when posting online do not misrepresent who you are. For example, if you are not a vice president, do not say that you are.**

Most importantly, we must never discuss or disclose confidential information or release material, non-public information via social media or otherwise. If you find yourself wondering if you can talk about something online that you learned at work—don’t. See the section on “Protecting Our Information” for more details.

## Protecting the environment

The Company is committed to protecting the environment, ensuring sustainability, and supporting social responsibility. We are dedicated to taking all appropriate measures to ensure our manufacturing, transportation, and waste disposal activities are consistent with environmental protection.

Employees are expected to identify and manage all environmental and social risks with applicable laws, rules, and regulations pertaining to the environment. For additional information, please refer to Roper’s Environment, Health and Safety Policy, available at <https://www.ropertech.com/policies/>.



**My coworker has a public Instagram where she makes posts in support of White Supremacy. Can I report her?**



**Yes. Your coworker’s social media posts are in violation of Roper’s Code of Conduct, which prohibits racial discrimination. You should report her posts directly to your supervisor, your HR representative, or contact the Compliance Officer or Ethics and Compliance Line.**

## Respecting local laws and customs

**The Company expects you to obey the law wherever we operate. This also means endeavoring to respect local customs and institutions. We must, however, be mindful of local customs that violate the law or Company policies, including for example offering payments in exchange for expedited services.**

## Complying with anti-boycott laws

The Company must not enter into agreements that have the effect of furthering any unsanctioned boycott of a country that is allied with the United States. The United States prohibits actions and agreements that could further any boycott not approved by the United States, including:

- **refusing to do business with other persons or companies**
- **discriminating in employment practices**
- **furnishing information on the race, religion, gender, or national origin of any U.S. person, or**
- **utilizing letters of credit that contain prohibited boycott provisions**

The Company must report any request to take action or attempt to reach agreement that would violate these prohibitions.

## Following export and import controls, embargoes, and sanctions

Many countries, including the United States, place controls and/or prohibitions on certain trade transactions involving export, re-export, and import of goods, software, and technology, including the disclosure of technical data to foreign persons.

Further, the Company must comply fully with all economic sanctions and embargoes that restrict persons or corporations from doing business with certain individuals, groups, entities, or countries. Even in country trade may have restrictions due to economic sanctions and embargoes that restrict dealing with certain individuals, groups, or countries. Prior to engaging in any transaction, employees must ensure the transaction complies with all applicable laws, rules, and regulations.

## Respecting human rights

We are committed to respecting human rights everywhere and support global efforts to protect human rights. All of our businesses, employees, agents, and vendors must comply with all applicable laws prohibiting forced labor, child labor, human trafficking, and modern-day slavery. For additional information, please refer to Roper's Human Rights Policy, available at <https://www.ropertech.com/policies/>.

**Q:**

**During a recent visit to a supplier, I noticed several workers who seemed to be underage. My host assured me that they are older than they look and that everyone was treated well. Should I escalate my concern?**

**A:**

**Yes. The Company does not tolerate child labor anywhere in our supply chain. You should raise your concern with your supervisor or the Compliance Officer so they can investigate.**

## Contact options

- Talk to your supervisor, manager, Roper Human Resources, or your Human Resources
- Talk to the Compliance Officer, +1 (941) 556-2663
- Email the Compliance Officer at [ethics@ropertech.com](mailto:ethics@ropertech.com)
- Use the Ethics and Compliance Line
  - Access all country numbers at <https://www.ropertech.com/code-of-ethics/>
  - Submit online at [www.roper.ethicspoint.com](http://www.roper.ethicspoint.com)