

California Transparency in Supply Chain Act Disclosure Cal. Civ. Code § 1714.43

At SPX FLOW, principled business practices are integral to our corporate values. As a company, we conduct business in a way that respects human rights. We provide equal opportunity in our employment practices and seek to ensure that all persons are treated with fairness and dignity. We are committed to providing a work environment that is healthy, safe and free from all forms of illegal discrimination or harassment, and we seek to comply with all laws regulating the way our products are manufactured. We require that our employees respect the rights, dignity and self-esteem of all persons in any way involved with SPX FLOW business and prohibit taking any unfair advantage of anyone through manipulation, concealment, misrepresentation of facts or any other unfair practices. SPX FLOW works to meet the needs of a growing global community in a responsible manner.

Our policy expressly forbidding human trafficking in all forms is contained in the SPX FLOW Code of Business Conduct:

“We prohibit forced labor, slavery and trafficking in persons. Employees, contractors, subcontractors, vendors, suppliers, partners and others through whom SPX FLOW conducts business must not engage in any practice that utilizes child, slave, prisoner or any other form of forced or involuntary labor, or engage in abusive, misleading or corrupt employment practices resulting in forced labor, slavery or human trafficking, including (i) destroying, concealing, confiscating or otherwise denying access to an individual’s identity or immigration documents, such as passports or drivers’ licenses, and (ii) failing to disclose during the recruitment process, or making material misrepresentations concerning, key terms and conditions, including wages, benefits, work location, living conditions, housing, transportation and associated costs.”

Additionally, we evaluate and address direct supply chain risks by requiring suppliers to abide by our contractual terms and conditions prohibiting human trafficking. Our Global Terms and Conditions of Purchase (“Global Terms”) obligates suppliers to (i) adhere to anti-slavery and human trafficking laws and ethics standards, (ii) upon request, provide written certification of compliance with these laws and standards, and (iii) permit SPX FLOW to conduct confirmatory audits:

“Seller further represents and warrants that neither it nor any of its subcontractors, vendors, agents or other associated third parties will utilize child, slave, prisoner or any other form of forced or involuntary labor, or engage in abusive or corrupt employment practices, in the supply of goods or provision of services to Buyer Failure of Seller to comply with this Section constitutes a material breach of these Terms, and Buyer may immediately terminate this Agreement and/or any outstanding Order(s) At Buyer’s request, Seller shall certify in writing Seller’s compliance with any or all of the foregoing and/or permit Buyer to audit such records as reasonably necessary to confirm Seller’s compliance with this Section 12.”

A supplier’s violation of its anti-forced labor and human trafficking commitments constitutes a material breach of the Global Terms warranting our immediate termination of its contract and all outstanding orders.

Further, we maintain a compliance hotline, hosted by a third party, that enables any person to submit concerns regarding human trafficking occurring within our supply chains. All reports to our hotline are investigated thoroughly at the direction of our Chief Compliance Officer, with remedial action taken against suppliers if warranted. As a matter of standard practice, we do not utilize third parties to evaluate and verify supply chain human trafficking risks.

We expect our supply chain managers to engage with suppliers and to make assessments of any questionable activity and to ensure that supplier practices conform to our contractual terms and conditions, and to our standards and expectations. We do not conduct audits of suppliers to evaluate, or require suppliers to certify to, compliance with company standards or laws for human trafficking. We do not conduct independent, unannounced audits.

All SPX FLOW management and employees are held accountable for failing to meet company standards prohibiting human trafficking in that they must abide by our Code of Business Conduct, our company values, and all applicable laws. Failure to do so results in disciplinary action up to and including termination of employment. Moreover, we instruct our employees that even conduct that is legal, or not legally restricted, is not permissible if not also ethical. For our employees with direct responsibility for supply chain management, we require regular, periodic training on mitigating human trafficking risks.