



## **ESCO TECHNOLOGIES INC.** **VENDOR CODE OF CONDUCT**

**Revised January 29, 2026**

This Vendor Code of Conduct sets out certain minimum standards of conduct and business practices required of the vendors, suppliers, representatives, agents, subcontractors and business partners ("Vendors") of ESCO Technologies Inc. and its subsidiaries ("ESCO").

ESCO realizes that its Vendors are independent entities. However, a Vendor's conduct may reflect upon, and in some cases may directly affect, ESCO and its business reputation. Therefore, ESCO expects its Vendors to adhere to generally accepted standards of business conduct and to carry on their businesses in ways which reflect the spirit as well as the letter of applicable laws, and to require that the Vendors' own employees, agents and subcontractors ("Representatives") do the same.

The provisions of this Vendor Code of Conduct are only minimum requirements, and they supplement and do not replace any specific obligations under any contract between ESCO and a Vendor. In the event that a Vendor believes there is any conflict between this Vendor Code of Conduct and a particular contract with ESCO or any other obligation of the Vendor, the Vendor should promptly notify ESCO as provided under "Reporting of Questionable Behavior or Suspected Violations," below.

### **Legal and Regulatory Compliance Practices**

Vendors must comply with all laws and regulatory requirements applicable to their businesses, and require that their Representatives do the same.

In particular, and without limitation, Vendors and their Representatives shall:

- Comply with the anti-corruption laws of the countries in which they do business, including without limitation the United States Foreign Corrupt Practices Act and the United Kingdom Bribery Act 2010, and not make any direct or indirect payment, offer or promise of money or other thing of value to any government official, whether foreign or domestic, for the purpose of obtaining or retaining business.
- Not make any direct or indirect payment, offer or promise to any other person for the purpose of improperly obtaining or retaining business.
- Comply with applicable trade control and anti-boycott laws as well as all export, re-export and import requirements governing ESCO's products.



- Comply with antitrust and fair competition laws that govern the jurisdictions in which they conduct business.
- Comply with applicable environmental, health and safety laws and regulations.
- Create, retain, safeguard and dispose of their business records in full compliance with all legal, contractual and regulatory requirements.
- Be honest, direct and truthful in discussions with regulatory agency representatives and government officials.

### **Protection of ESCO Proprietary Information**

Vendors and their Representatives shall treat as proprietary any information belonging to ESCO or any third parties disclosed to Vendor and their Representatives in the course of providing services to ESCO. Unless otherwise agreed in writing by ESCO, information developed or created by Vendors and their Representatives while performing services for ESCO shall exclusively belong to ESCO. Vendors and their Representatives shall not, without the prior written consent of ESCO, disclose or reveal any of said information to any third party or use such information for any purposes other than to provide the services to ESCO. Specifically, all tangible materials of any kind in the possession or control of Vendors and their Representatives which in any way relate or pertain to ESCO's business ("ESCO Proprietary Data") or any tangible materials prepared, compiled or acquired by Vendors and their Representatives that incorporate ESCO Proprietary Data shall be the sole property of ESCO and shall be returned immediately upon ESCO's request. At all times, Vendors and their Representatives shall respect ESCO's intellectual property ownership rights including but not limited to copyrights, trademarks and trade secrets.

### **Business Practices**

Beyond complying with applicable legal and regulatory requirements, Vendors must conduct their business activities with integrity and in accordance with the highest standards of business conduct, and require that their Representatives do the same.

Vendors and their Representatives must be aware of the specific standards of conduct as set forth in ESCO's Code of Conduct. Vendors must conduct their businesses in accordance with all such standards applicable to their businesses and must not induce or attempt to induce any ESCO employee to do anything which would violate that Code. The Code of Conduct is a governance document available in the Investor Center of ESCO's website [www.escotechnologies.com](http://www.escotechnologies.com).



In particular and without limitation, Vendors and their Representatives shall:

- Act in a professional manner at all times while on ESCO's premises or while acting on its behalf.
- Avoid engaging in or giving the appearance of a conflict of interest in dealing with ESCO employees.
- Not give or promise any gift of more than nominal value to any government employee.
- Not give or promise any gift, or provide any meals or entertainment, to any government, employee or other person which is in excess of normal industry policies or practices in the locality or is for the purpose of obtaining an improper or unearned business advantage either for Vendors and their Representatives or ESCO.
- Never give or promise a gift of cash. Not offer any bribe, kickback or other incentive to any ESCO employee or representative. Vendors and their Representatives who receive a solicitation of such an offer must report it to ESCO as provided under "Reporting of Questionable Behavior or Suspected Violations," below.
- Not buy or sell ESCO's stock while in possession of information about ESCO that is not generally available to the investing public and that could influence an investor's decision to buy or sell stock.
- Observe and respect ESCO's intellectual property ownership rights including but not limited to copyrights, trademarks and trade secrets.
- Honestly and accurately bill for products and services in accordance with the applicable contract or purchase order.
- Not speak to the media or post public statements about ESCO or its business unless expressly authorized to do so in writing by a senior officer of ESCO.

## **Environment**

ESCO's Environmental Policy formalizes ESCO's commitment to environmental compliance and reducing its environmental footprint. ESCO seeks to decrease its environmental footprint by pursuing strategies to reduce electricity usage, fuel usage and water consumption and by measuring its progress. Vendors must conduct their businesses in accordance with ESCO's Environmental Policy and all such principles, and in full compliance with all applicable environmental laws and regulations. Vendors shall require that their Representatives do the same. ESCO's Environmental Policy is available in the Corporate Citizenship section of ESCO's website [www.escotechnologies.com](http://www.escotechnologies.com).



## **Employment Practices**

ESCO's Human Rights Policy formalizes ESCO's commitment to human rights and equal opportunity in the workplace. ESCO upholds and respects human rights as set out in the United Nations International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. ESCO also recognizes its responsibility to respect human rights and avoid complicity in human rights abuses, as stated in the United Nations' Guiding Principles on Business and Human Rights. ESCO's Human Rights Policy and Human Anti-Trafficking Policy states ESCO's policies with respect to human trafficking and forced labor.

Vendors must conduct their businesses in accordance with ESCO's Human Rights Policy, ESCO's Human Anti-Trafficking Policy and all such principles, and in full compliance with all applicable laws and regulations in their locations globally. Vendors shall require that their Representatives do the same. ESCO's Human Rights Policy and Human Anti-Trafficking Policy are available in the Corporate Citizenship section of ESCO's website [www.escotechnologies.com](http://www.escotechnologies.com).

In particular and without limitation, Vendors and their Representatives shall:

- Carry on their businesses without unlawful discrimination, maintain workplaces free from sexual or other harassment, and prohibit physical or verbal abuse of employees.
- Provide safe and healthy work environments and fully comply with all applicable safety and health laws, regulations and practices.
- Prohibit the use, possession, distribution or sale of illegal drugs.
- Not use involuntary or forced labor, such as indentured labor, bonded labor or prison labor.
- Comply with all applicable minimum working age laws and not utilize child labor in any event.
- Comply with all applicable laws governing compensation, overtime, working hours and working conditions.

Respect their employees' rights to freedom of association and collective bargaining, which includes the right to join, form or not to join a works council without fear of reprisal, intimidation or harassment.



### **No Creation of Third Party Rights**

This Vendor Code of Conduct does not confer any rights on third parties. No Vendor or Representative will have any rights against ESCO by virtue of this Code of Conduct, the interpretation and enforcement of which is in ESCO's sole discretion.

### **Reporting of Questionable Behavior or Suspected Violations**

Vendors and their Representatives may raise any questions or concerns regarding this Vendor Code of Conduct with their primary ESCO business contact or with the Ethics Officer for the ESCO subsidiary which they have their primary business relationship. Any suspected misconduct should be reported to such Ethics Officer, or alternatively, to any of the following ESCO officials:

- Corporate Ethics Official, Attn: Chief Human Resources Officer, ESCO Technologies Inc., 645 Maryville Centre Dr. Suite 300 St. Louis, MO 63141

Phone: (314) 213-7226;

Email: [corporateethicsofficial@escotechnologies.com](mailto:corporateethicsofficial@escotechnologies.com)

- General Counsel, ESCO Technologies Inc., 645 Maryville Centre Dr. Suite 300 St. Louis, MO 63141

Phone: (314) 213-7217

E-mail: [escollegal@escotechnologies.com](mailto:escollegal@escotechnologies.com)

- Ombudsman, ESCO Technologies Inc., 645 Maryville Centre Dr. Suite 300 St. Louis, MO 63141

Phone: (U.S. only): Ombudsman Hotline at (800) 272-0872

E-mail: [Ombudsman@escotechnologies.com](mailto:Ombudsman@escotechnologies.com)

Suspected misconduct may be reported anonymously. The identity of any person asking questions, raising concerns or reporting suspected misconduct will be safeguarded to the extent reasonably possible. Questions or reports submitted in a language other than English should be in written form.

### **Compliance**

ESCO may audit Vendor and inspect Vendor's facilities to confirm compliance with this Code of Conduct. ESCO may require Vendor to immediately remove any Vendor employee or Representative that acts inconsistently with this or any other ESCO policy. Failure to adhere to this Code of Conduct may result in disqualification from consideration for future business with ESCO and may result in termination of existing business.



### **No Retribution or Retaliation**

ESCO will not tolerate any retribution or retaliation taken against any individual who has, in good faith, raised questions or sought out advice, or who has reported questionable behavior or a possible violation.