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|  | CRANE NXT POLICY: <b>CP-102ABC</b>                                  |                                                                    |
|                                                                                   | SUBJECT: ANTI-BRIBERY COMPLIANCE POLICY AND IMPLEMENTING PROCEDURES | Effective Date: June 19, 2026                                      |
|                                                                                   | APPLICATION: EVERYONE                                               | Owner: Legal – Ethics & Compliance<br>Approved By: General Counsel |

## 1. POLICY STATEMENT

Crane NXT, Co. and its subsidiaries (the “Company” or “Crane NXT”) is committed to conducting business ethically, transparently, and in full compliance with all applicable anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act 2010 (UKBA), and similar laws worldwide. This Anti-Bribery Compliance Policy and Implementing Procedures (“Policy”) establishes risk-based standards, controls, and approval requirements designed to prevent bribery, kickbacks, facilitation payments, and other improper payments in connection with the Company’s business activities.

This Policy applies to all Crane NXT personnel and certain third parties acting on the Company’s behalf. Everyone covered by this Policy is responsible for understanding and complying with its requirements, exercising sound judgment, maintaining accurate books and records, and promptly reporting concerns or potential violations. Where questions arise or circumstances are unclear, employees must seek guidance from management or the Legal Department before proceeding. Violations of this Policy may result in disciplinary action, up to and including termination, and may expose individuals and the Company to civil or criminal penalties.

## 2. POLICY PURPOSE

The purpose of this Policy is to ensure that commercial transactions and other activities undertaken on behalf of Crane NXT. do not violate anti-bribery laws.

## 3. POLICY SCOPE

- a. For purposes of this Policy, the term “**Crane NXT personnel**” includes the following for Crane NXT and all affiliated companies and subsidiaries:
  1. Officers, Directors, Employees;
  2. Third Parties (as defined below) such as sales representatives and sales consultants paid a fee or commission on any transaction conducted on behalf of Crane NXT; and
  3. Distributors<sup>1</sup> if the below criteria are met.
- b. **Distributors** are subject to this Policy only if they meet at least one of the following conditions:
  1. Paid a fee or commission on any transaction conducted on behalf of Crane NXT; or
  2. Are not paid a fee or commission but are considered “High-risk” if both of the following criteria are met:
    - i. The distributor operates in a country with a Corruption Perceptions Index (CPI) score below 60. (Use the most recent CPI table: Transparency International CPI Table - [CPI Table](#).) and
    - ii. The distributor’s customers or end users include:
      - A foreign government, or
      - A state-owned enterprise (SOE)

The Business Unit must document the Third Party’s response to whether its end users include foreign governments or state-owned enterprises.

**Summary Table**

| Distributor Type                                  | Subject to Policy? | Conditions                                               |
|---------------------------------------------------|--------------------|----------------------------------------------------------|
| Paid a fee or commission                          | Yes                | Automatically covered                                    |
| Not paid a fee or commission                      | Yes                | Only if: CPI < 60 and end users include governments/SOEs |
| Not paid a fee or commission and low-risk profile | No                 | CPI ≥ 60 or no government/SOE end users                  |

<sup>1</sup> Distributors: Companies that buy products from Crane NXT for resale to retailers, resellers or direct end users.

#### 4. DEFINITIONS AND PRINCIPLES

##### a. **Anything of Value**

The phrase “**anything of value**” means anything that the recipient would recognize as having value, including but not limited to:

1. Cash;
2. Stocks;
3. Entertainment;
4. Gifts;
5. Donations to a cause or organization favored by a government official;
6. Discounts on products and services that are not readily available to the public;
7. Offer(s) of employment (including to relatives of government officials);
8. Assumption or forgiveness of debt;
9. Payment of travel expenses; and
10. Personal favors.

##### b. **Third Party**

For purposes of this Policy, a Third Party means any non-Crane NXT individual or entity that directly or indirectly performs services for, represents, acts on behalf of, or does business with Crane NXT, including but not limited to agents, sales representatives, sales consultants, distributors (if applicable), advisors, contractors, sub-agents, joint-venture partners, or any other party engaged to assist Crane NXT in obtaining or retaining business or interacting with customers, government officials, or other business partners.

##### c. **Government Official or Employee**

“Government official” includes: (a) any officer or employee of a national, regional, or local government; (b) any officer, employee, or representative of a government department, agency, or instrumentality; (c) any individual acting in an official capacity for a government entity; (d) any officer or employee of a state-owned or state-controlled enterprise; (e) any official or employee of a public international organization (e.g., the United Nations, World Bank); and (f) any political party official or candidate for political office.

##### d. **Bribe**

A bribe occurs when one party gives or offers another party, either directly or through a third party, any reward, advantage, or benefit of any kind that (whether intended or not) could influence a decision or action by the party, such as to retain or obtain business. Bribery occurs in a variety of ways, such as an offer of money, charitable contributions, sponsorship, or anything of value (defined in 3.a). A kickback is a bribe in the form of an offer to return to the decision maker a portion of the revenue from the awarded business.

Crane NXT personnel shall not authorize, tolerate, encourage, or make any bribe, to or for the benefit of any third party (including any government official) for the purpose of obtaining or retaining Company business or gaining a competitive advantage, or securing any other improper benefit.

Crane NXT personnel are prohibited from authorizing bribes through third parties acting on behalf of Crane NXT.

##### e. **Facilitation payments**

Facilitation payments are relatively small payments to government officials or employees (defined in 3.b) to have them take action, that they are required to take, but to do so in a more expeditious manner (e.g., to process licenses and visas, to obtain customs clearance, or to provide services such as mail delivery and telecommunications installation) or to prevent other actions such as the imposition of a fine.

Crane NXT personnel are prohibited from making facilitation payments unless imminent health or safety threats are present.

##### f. **Entertainment and Hospitality**

Entertainment and Hospitality must comply with the thresholds and approvals set out in Appendix E.

Entertainment and hospitality expenses are allowed only when (1) the primary purpose is legitimate business, (2) the cost is modest and consistent with local business norms, (3) the expense does not exceed the monetary thresholds set out in this Policy, (4) the activity is not intended to influence a business decision improperly, and (5) the expense is fully documented and approved in advance as required.

For purposes of this policy:

**Entertainment** refers to activities or events provided for enjoyment in a business context, such as invitations to athletic or cultural events, transportation, and lodging.

**Hospitality** refers to the provision of food and beverages, such as meals (e.g., lunch or dinner) in connection with business discussions.

- The intent behind any entertainment or hospitality must always be legitimate and never to influence a business decision or secure an improper advantage.
- Entertainment and Hospitality must be reasonable and suitable for a business environment
- For ticketed events, such as athletic or cultural events, a Crane NXT employee must accompany guests.
- Providing entertainment or hospitality to a U.S. government employee is prohibited without the prior approval of the Crane NXT Legal Department.
- Employees and representatives may not use personal funds to provide entertainment and hospitality or anything of value to bypass the requirements of this Policy.
- Third Party company representatives, including distributors and sales consultants, must be advised that they are not permitted to offer hospitality to Company customers without prior approval.

g. **Customer Visits to Company Locations (e.g., Production Facilities, Offices)**

You must ensure that the visit is principally for professional purposes and that the extent and value of the hospitality being offered is clearly documented and not extravagant. Hospitality must directly support the legitimate business purpose. It is recommended that production approval visits or similar activities be addressed in the sales contract to clearly define cost responsibilities. Follow your business unit's procedures for customer visits, if applicable.

In addition, organizing or paying for additional non-business aspects for customer visits is not allowed. For instance, Crane NXT personnel must not organize "side" trips associated with the legitimate business visit, nor should personnel arrange for or pay for family members to accompany the business contact.

Entertainment and Hospitality must align with the approval Table in Appendix E. Employees should also consult the Quick Decision Checklist in Appendix E before offering anything of value.

h. **Gifts to Third Parties**

No guidelines can clearly define the point at which social courtesies escalate to improper or unethical payments, so extreme care must be taken when giving gifts. A person's perception of their intent with a certain gift is irrelevant.

For purposes of this policy:

A **gift** is any item of value including cash, gift cards, merchandise, services, or other benefits provided to another person without expectation of payment or fair market exchange.

- The intent behind any gift must always be legitimate and never influence a business decision or secure an improper advantage.
- Employees and representatives may not use personal funds or funds of third parties to provide gifts or anything of value to bypass the requirements of this Policy.
- Company representatives, including distributors and consultants, must be advised that they are not permitted to offer gifts to Company customers without prior approval.

Gift giving must align with the approval Table in Appendix E. Employees should also consult the Quick Decision Checklist in Appendix E before offering anything of value.

i. **Charitable contributions**

Charitable contributions are only permitted through the Crane NXT charitable funds.

- j. **Political contributions**  
Political contributions using Crane NXT monies are prohibited.

5. **BOOKS AND RECORDS**

All corporate records for which directors, employees, and representatives are responsible must accurately and fairly represent the activities they record and the nature and purpose of the activity. No false or inaccurate entries shall be made in Crane NXT's records for any reason.

6. **RETAINING THIRD PARTIES**

To protect the Company against unauthorized actions by a third-party salesperson or sales organization, such companies/persons should be designated as "sales representatives" or "sales consultants" instead of "agents." Crane NXT's due diligence requirements reflect the obligations imposed by global anti-bribery laws, including the FCPA and UKBA, which establishes a strict liability offense for failing to prevent bribery by third parties acting on a company's behalf.

Before proceeding with any contract or other arrangement with a prospective Third Party, Crane NXT personnel must complete and document appropriate due diligence and take the following steps:

- a. The Business Unit must complete:
  - i. Due Diligence for Third Parties (Attachment A); and
  - ii. RISK ASSESSMENT: Third Party Qualifications (Attachment B).
- b. The Third Party must complete (prior to the initial appointment and at least every two years thereafter):
  - i. RISK ASSESSMENT: Third Party Certification (Attachment C); and
  - ii. ANTI-BRIBERY Certification (Attachment D)

The application must be approved at a minimum by the Business Unit President or designee. The Business Unit President has the authority to delegate this task to the Vice President of Finance, or any Business Unit Leader who is a direct report to the Business Unit President. No further delegation is permitted.

c. **Compensation**

A. Sales Representatives or Sales Consultants or Distributors Paid a Fee or Commission

1. The compensation paid to a third-party salesperson or sales organization must:
  - Be reasonable based on prevailing industry standards;
  - Be commensurate with the party's experience and services;
  - Be appropriate under the circumstances, for the business unit and for the industry;
  - Include a calendar year compensation cap (including commissions, retainers, bonus, and any expenses) of no more than USD 400,000; and
  - Include a commission rate no greater than 10% of the transaction, sale, or contract.
2. Approval from the Crane NXT Legal Department is required for commission rates greater than 10% and/or compensation caps more than USD 400,000.
3. Be certain to comply with all relevant procedures implemented by your business unit with respect to retaining a third-party salesperson or sales organization.

B. Distributors not Paid a Fee or Commission but that are Considered High Risk for Purposes of this Policy

1. Some distributors may receive a rebate or discount instead of a formal commission. In such instances, the rebate and/or discount offered to a distributor must:
  - Be reasonable based on prevailing industry standards;
  - Be commensurate with the party's experience and services; and
  - Be appropriate under the circumstances, for the business unit and for the industry.
2. Approval from the Business Unit President is required if the rebate and/or discount pertains to an order

greater or equal to USD 1 million and results in a Shipment Profit margin less than or equal to 25%.

3. Be certain to comply with all relevant procedures implemented by your business unit with respect to retaining a distributor.

C. Payments

Other than in extraordinary circumstances, no payment to any business counterparty or its representative may be made in cash. All payments must be made to a bank account in such party's or representative's name in the country where the party or representative regularly delivers service for Crane NXT. Any exception to the aforementioned requires specific advance written approval from Crane NXT's General Counsel, which will be granted only upon showing of extraordinary justification (such as in combat zones where there is no banking system), and detailed records must be kept assuring accountability. All payments must also comply with Crane NXT's financial accounting standards.

- d. A fully documented justification is required for any additional payments made beyond those required of the compensation terms in the original agreement. The justification should be in the form of an internal memorandum that explains the services performed outside the scope of the original agreement that forms the consideration for the additional payment and must be approved by the Business Unit President.
- e. As described in the Due Diligence for Third Parties (Attachment A), Crane NXT personnel must investigate the relevant entities and territories, including:
  - i. Conducting site visits and in-person interviews (to the extent possible);
  - ii. Checking references and publicly available information;
  - iii. Confirming that the proposed rate of compensation is reasonable based on prevailing industry standards and commensurate with the party's experience and services; and
  - iv. In appropriate circumstances (for example, when "red flag" situations described below are present), retaining a service provider (such as Dow Jones) to obtain additional relevant information.
- f. A prospective Third Party is required to comply with this Policy, the prospective contract (or other written arrangement) with Crane NXT and the ANTI-BRIBERY CERTIFICATION (Attachment D). These requirements must be reviewed with the prospective Third Party, and training provided, if necessary. The Third Party must sign the ANTI-BRIBERY CERTIFICATION (Attachment D) at the time of execution of any agreement and at least every 2 years thereafter.
- g. Crane NXT personnel must compile and retain records of the due diligence activities undertaken with respect to a Third Party. The original records for each Third Party (Attachments A, B, C and D) with the signed approvals must be retained by the Business Unit.
- h. Before being retained by Crane NXT, and every two years thereafter, the Third Party must be given a copy of this Policy.
- i. In conducting business, Crane NXT personnel need to be aware of and employ special scrutiny in red flag situations. These situations include, but are not limited to:
  - i. Demands or offers of lavish gifts, entertainment, or hospitality exceeding Crane NXT's monetary thresholds (e.g., greater than USD 250 per person);
  - ii. Requests for payment in cash or to a numbered account or the account of an unrelated third party;
  - iii. Requests for payment in a country other than the intermediary's country of residence or the territory of the sales activity (especially if it is a country with weak financial transparency or country identified on international high-risk jurisdiction lists (e.g., FATF, EU AML lists);
  - iv. Requests for payment in advance or partial payment immediately prior to a procurement decision;
  - v. Requests for payment for extraordinary, ill-defined, or last-minute expenses, or for an unexpected additional fee or commission to 'facilitate' a service;
  - vi. Requests for reimbursement of expenses lacking full and transparent documentation or receipts;
  - vii. A third party that:
    - Is owned by a government entity or has an employee who simultaneously holds a government position;
    - Has a family member in a government position, especially if the family member works in a procurement or decision-making position or is a high-ranking official in the department that is the target of the intermediary's efforts;

- Refuses to disclose owners, partners, or principals, or identifies a business reference who declines to respond to questions or who provides an evasive response;
- Uses shell or holding companies or other unusual corporate structures that obscure ownership without credible explanation;
- Is specifically requested by a customer, or requests that you provide employment or some other advantage to a friend or relative;
- Is recommended by an employee with enthusiasm that is out of proportion to qualifications;
- Has a business that seems understaffed, ill-equipped, or inconveniently located to support the proposed undertaking;
- Has little or no expertise in the industry in which he/she seeks to represent the Company;
- Is insolvent or has significant financial difficulties;
- Is ignorant or indifferent to local laws and regulations governing the region in question and the representative's proposed activities in particular;
- Declines to sign an agreement or certification, or to provide a proper invoice for services;
- Is the subject of credible rumors or media reports of inappropriate payments; or
- Is currently under investigation or has been convicted of previous violations of law.

If a red flag situation is discovered, Crane NXT personnel must seek guidance from the Crane NXT Legal Department.

- j. Agreements must exclude payments to a Third Party when laws or regulations prohibit the payment of commissions for certain sales. For example, sales commissions are not permitted on most Foreign Military Sales and certain countries prohibit the payment of commissions on sales to government owned entities.
- k. All Crane NXT personnel must report any suspected or actual violations (whether based on personal knowledge) of applicable law or regulations and must provide all pertinent information to assist in any internal investigation of the relevant circumstances. Reports should be made using Crane NXT's Ethics and Compliance Hotline: 844-579-1646 (for callers within the U.S. or Canada) or 001-610-943-7779 (for callers outside the U.S. or Canada), or by email at [ethics@cranenxt.com](mailto:ethics@cranenxt.com).
- l. Under no circumstances will the act of reporting, in good faith, an impropriety serve as a basis for retaliatory actions against any employee.

## 7. **EMPLOYEE EDUCATION AND TRAINING**

To ensure that all Crane NXT personnel involved in Crane NXT's business are thoroughly familiar with this Policy, Crane NXT has developed an employee education program which includes the following elements:

- Distribution of this Policy, on a periodic basis, to all Crane NXT personnel involved in Crane NXT's business transactions and related activities;
- Training sessions for selected Crane NXT personnel regarding this Policy; and
- Explanation of this Policy to all new Crane NXT personnel who are likely to be involved in Crane NXT's business transactions and related activities.

## 8. **EMPLOYEE COMPLIANCE**

Business Unit Presidents must ensure that all employees within their respective business units are aware of and comply with this Policy.

Failure to follow the principles and steps set out in this Policy may result in disciplinary action. The disciplines that may be imposed include but are not limited to: (1) reprimand; (2) reduction in pay or other financial penalty; (3) demotion; (4) suspension; and/or (5) termination. Managers and supervisors, including up to Business Unit Presidents are also subject to sanction for supervisory failures.

Please note that government regulatory agencies can impose civil and criminal penalties, including fines against individuals that cannot be reimbursed by the Company as well as jail terms up to ten (10) years.

- a. Examples of actions or omissions that will subject an employee to discipline include, but are not limited to, the following:
  - Failure to implement the principles and steps set forth in this Policy;

- Failure to report a suspected or actual violation of law or a breach of the principles and steps set out in this Policy;
  - Failure to make, or falsification of, any certification to Crane NXT;
  - Lack of attention or diligence on the part of supervisory personnel that directly or indirectly leads to a violation of law; or
  - Direct or indirect retaliation against an employee who, in good faith, reports an actual or suspected violation of law or these principles.
- b. Employee adherence in the principles and steps set out in this Policy and Crane NXT's Code of Business Conduct and Ethics will be elements of each employee's annual personnel evaluation and, as such, they will affect decisions concerning compensation, promotion and retention.

## Attachment A Due Diligence for Third Parties

| Instructions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| <p><b><u>Business Unit:</u></b></p> <p>The Business Unit is responsible for conducting diligence on the prospective Third Party. The Business Unit is required to ensure completeness of each item on this list and is required to complete Attachment B – <u>RISK ASSESSMENT: Third Party Qualifications</u>. A copy of this page with appropriate comments and signature should be filed and kept in the Third Party's file.</p> <p><b><u>Third Party:</u></b></p> <p>The Third Party is responsible for completing Attachment C – <u>RISK ASSESSMENT: Third Party Certification</u> and D – <u>ANTI-BRIBERY CERTIFICATION</u>.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Recommended Procedures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <p><b>1. <u>Evaluate the territory</u></b></p> <p>Before entering a relationship, consider whether the country has a high incidence of public corruption. News reports provide some guidance. In addition, Transparency International publishes a periodic ranking of the most corrupt governments. Caution is due in countries with a reputation for public corruption, or for any country with a Transparency International corruption perception index score below 60.</p> <p><b>Documentation</b></p> <ul style="list-style-type: none"> <li>A copy of the Transparency International page showing the CPI for the relevant country for the prior year. CPI Link: <a href="#">CPI Table</a></li> <li>Results of the country research (e.g., news articles on the corruption level in the country, relevant industry).</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <p><b>2. <u>Justify the Third Party</u></b></p> <p>Justification for the retention of the Third Party and related compensation is necessary before entering a relationship.</p> <p><b>Documentation</b></p> <ul style="list-style-type: none"> <li>Attachment B – <u>RISK ASSESSMENT: Third Party Qualification</u> must be completed by the Business Unit.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <p><b>3. <u>Investigate the Third Party's experience and skills</u></b></p> <p>A thorough examination of the background of the Third Party is necessary before entering a relationship. It is important to document the Third Party's business experience and qualifications.</p> <p><b>Recommended Procedures</b></p> <ul style="list-style-type: none"> <li>It is important to take the time to confirm the accuracy of the information provided in response to due diligence inquiries.</li> <li>A face-to-face visit at the offices of the Third Party to ensure that the party has the capacity to perform the services.</li> <li>If negative information is discovered, document that finding and contact the Legal Department for guidance.</li> <li>Research publicly available information regarding the integrity of the third party. Sources for such information include broad-based internet searches, the U.S. Embassy and consulate personnel for third parties outside of your home country, banks, the local Chamber of Commerce, and the relevant trade ministry.</li> <li>Request and contact business references, including other companies that have worked with the Third Party.</li> <li>Confirm that the Third Party is not on any denied or restricted parties list, either in the U.S. or in the representative territory (e.g., U.S. OFAC SDN List, BIS Entity List, EU Consolidated List, UN Sanctions List).</li> </ul> <p><b>Documentation</b></p> <ul style="list-style-type: none"> <li>Attachment C – <u>RISK ASSESSMENT: Third Party Certification</u> must be completed by the Third Party.</li> <li>Results of the internet and social media search conducted on the Third Party. Document the date of the search and include screenshots or PDF copies.</li> <li>Results of the restricted party screening during due diligence.</li> <li>Communications pertaining to business references.</li> <li>Copies of the Third Party's code of conduct and/or anti-bribery policies, if available.</li> <li>Due Diligence report from a service provider (e.g., Dow Jones), if warranted.</li> </ul> |



**4. Incorporate compliance with anti-bribery laws into the agreement with the Third Party**

Every agreement must include the following safeguard provisions:

1. A representation and warranty that the party comply with all applicable anti-bribery laws, e.g., will not make any corrupt payments for the purpose of obtaining or retaining business;
  - Attachment D – ANTI-BRIBERY CERTIFICATION should be included in all agreements.
2. A representation and warranty that the party will comply with all local law requirements in performing the agreement;
3. A provision allowing the Company to terminate the agreement if the party violates the above commitments;
4. A provision allowing either party to unilaterally terminate the agreement upon 60 days' written notice, upon convenience, and for any reason; and
5. A provision allowing the Company to audit the party's books and records.

**5. Look for "red flag" situations**

Additional caution and due diligence are required in so-called "red flag" situations, which include but are not limited to the following:

1. Family or business ties with government officials or other covered persons, or with persons associated with potential customers;
2. A history of corruption in the country;
3. Industries in which corruption is common (examples include oil, aircraft);
4. Requests for an unusually high commission, discounts, rebates, or other payments;
5. Requests for payment in a third country or to a third party or an off-book account, or another unusual payment arrangement;
6. A refusal by a Third Party to provide a certification that it will not take any action in furtherance of a corrupt payment;
7. An apparent lack of qualifications or resources on the part of a Third Party to provide the services offered;
8. A recommendation of a Third Party by a potential governmental customer;
9. Transactions recorded as "cash" or checks drawn to cash;
10. Over-invoicing or lack of standard invoices;
11. Unusual credits granted to new customers;
12. Managers of operations who have been paid unusual bonuses; and
13. Large and frequent fourth quarter adjustments.
14. Requests to avoid written contracts;
15. Unusually close relationships with procurement officials;
16. Signs of shell companies (e.g., no website, no employees);
17. Adverse media showing fraud, tax evasion, sanctions exposure

**\*\*\*Any identified red flags must be documented.**

**6. Ongoing oversight**

Concerns about compliance with anti-bribery laws do not end with the completion of an agreement. Business Units must remain informed of the Third Party's activities throughout the relationship and address any warning signals or changes in risk as they arise. This includes monitoring performance, payments, and interactions with other parties (e.g., customers, government officials) to ensure activities remain consistent with the approved scope of services and this Policy. Due diligence and certifications must be refreshed at least every two (2) years, or more frequently based on risk.

**CRANE NXT EMPLOYEE CONDUCTING THE REVIEW**

|                                  |  |
|----------------------------------|--|
| <b>Completed By (signature):</b> |  |
| <b>Name (printed):</b>           |  |
| <b>Title:</b>                    |  |
| <b>Date:</b>                     |  |

**Attachment B**  
**RISK ASSESSMENT: Business Justification Summary for Third Party Qualification**

| <b>I. THIRD PARTY INFORMATION</b>                                             |  |
|-------------------------------------------------------------------------------|--|
| <b>Third Party Company Name</b>                                               |  |
| <b>Contact Name for Crane NXT</b>                                             |  |
| <b>Other Names Under Which Third Party Conducts Business</b>                  |  |
| <b>Third Party Home Country or Country in which Third Party is Registered</b> |  |
| <b>Proposed Territory</b>                                                     |  |

| <b>II. THIRD PARTY QUALIFICATIONS</b>                                                                                                                                                                                                                                                                                                            |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>a. How did you come to know the Third Party?</b>                                                                                                                                                                                                                                                                                              |
|                                                                                                                                                                                                                                                                                                                                                  |
| <b>b. Describe the Third Party's qualifications for the position. By way of example consider providing specific details about the following: previous relevant experience, business relationships, industry expertise, knowledge of competitors, established relationship with customers and available resources and other relevant factors.</b> |
|                                                                                                                                                                                                                                                                                                                                                  |

**c. Were other Third Parties considered?**

Yes ☐

No ☐

If yes, why was this Third Party selected?

**d. Do you have any concerns regarding the Third Party's ethics?**

Yes ☐

No ☐

If yes, explain.

**e. Are you aware of any reason that the Third Party may not enter this relationship and perform these services?**

Yes ☐

No ☐

If yes, explain.

**f. Is the Third Party related (by blood, marriage or otherwise) to you or any other officer, director or any employee of Crane NXT?**

Yes ☐

No ☐

If yes, explain.

g. Conflicts of interest arise when your position with, or responsibilities to, Crane NXT present, directly or indirectly, an opportunity for personal gain apart from the compensation provided as a result of your employment with Crane NXT. A conflict of interest also exists any time your personal interests or competing business interests could be perceived to improperly influence how you fulfill your job duties for Crane NXT. The same pertains to your relatives, family members or affiliates.

As a result of retaining the Third Party, does a conflict of interest arise for you or for the Third Party?

Yes ☐

No ☐

If yes, explain

### III. Compensation

a. Describe the compensation terms, specifically explaining why the third-party services are required and whether the compensation is reasonable and customary in the territory.

- If possible, determine the typical compensation form (e.g., retainer or commission) and average commission rate, discount, or rebate in the region for the expected services. Commission arrangements should be considered both in terms of the rate structure, the aggregate payment, discount, or rebate.
- Consider whether there are any local law restrictions on the compensation to be paid or discounts or rebates offered.
- A higher-than-usual commission rate, discount or rebate might be justifiable based on the party's skills, contacts, and experience and, in such circumstances, the factors supporting the higher levels should be documented.
- A demand for an inordinately high level of compensation, discount or rebate is often a warning signal of the potential for diversion of funds and, as such, the third party should provide evidence that supports the need for higher compensation, discount or rebate before the request is granted. Be wary of unusual payment arrangements, such as a request to receive payment outside the relevant country or into a third-party bank account. In addition, a sudden request to increase the rate of payment close to a contract with a customer should be treated as a warning signal and carefully investigated.
- Do not agree to unusual payment arrangements.

**IV. OTHER**

**a. Provide additional information relevant to the Third Party and the proposed relationship to Crane NXT. Include attachments, if necessary.**

**V. CERTIFICATION BY CRANE NXT EMPLOYEE**

*To the best of your knowledge, you certify the accuracy of the above information.*

|                                  |  |
|----------------------------------|--|
| <b>Completed By (signature):</b> |  |
| <b>Name (printed):</b>           |  |
| <b>Title:</b>                    |  |
| <b>Date:</b>                     |  |

**Attachment C**  
**RISK ASSESSMENT: Third Party Certification**  
 TO BE COMPLETED BY THIRD PARTY

| Applicant Contact Information                                                                                                                                                                                            |             |                                                          |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|----------------------------------------------------------|
| Applicant Name and Address                                                                                                                                                                                               |             |                                                          |
| Phone                                                                                                                                                                                                                    | Fax         | E-Mail Address                                           |
| Point of Contact at Company                                                                                                                                                                                              |             | Title                                                    |
| If U.S. citizen, is Applicant a former employee of the Department of Defense or a legislative branch member? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>                 |             |                                                          |
| Applicant's Website                                                                                                                                                                                                      |             |                                                          |
| Type of Business: <input type="checkbox"/> Proprietorship <input type="checkbox"/> Partnership <input type="checkbox"/> Corporation <input type="checkbox"/> Individual                                                  |             |                                                          |
| Country/State of Incorporation                                                                                                                                                                                           |             | Registration Number (if applicable)                      |
| Taxpayer Identification Number (if a business in the United States)                                                                                                                                                      |             | Date of Establishment                                    |
| Owner(s)                                                                                                                                                                                                                 | Nationality | % Ownership                                              |
|                                                                                                                                                                                                                          |             |                                                          |
|                                                                                                                                                                                                                          |             |                                                          |
|                                                                                                                                                                                                                          |             |                                                          |
| Does any government department, agency or instrumentality, or any official or employee thereof, have ownership or other financial interest in Applicant's organization, or an affiliate thereof, directly or indirectly? |             | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| If "Yes," please specify:                                                                                                                                                                                                |             |                                                          |
|                                                                                                                                                                                                                          |             |                                                          |
| Name/Titles of Principal Officers                                                                                                                                                                                        | Education   | Employment Background                                    |
|                                                                                                                                                                                                                          |             |                                                          |
|                                                                                                                                                                                                                          |             |                                                          |
|                                                                                                                                                                                                                          |             |                                                          |
|                                                                                                                                                                                                                          |             |                                                          |

Is the Applicant, any owner, or any employee of the Applicant, or any principal officer an elected or appointed official or a former elected or appointed official of any government department including military, agency or instrumentality?  
For each "Yes" answer, provide name of government department, agency, or instrumentality, position or office held or sought, military rank where applicable, etc. and termination date:

☐ Yes ☐ No

Do any of the principals of the Applicant's organization have an ownership interest above 5% in any other organization?  
If "Yes," identify each such other organization, its address, its business activities, the role played in it by any principal of the applicant's organization, and any other relationship between the applicant and such other organization(s):

☐ Yes ☐ No

Has the Applicant, any associated organization, any prior organization, any prior associated organization, any present or former principal officer or employee, been suspended from doing business in any capacity, been charged with any criminal act, or been the subject of any allegation of fraud, misrepresentation, bribery, or other related activities?  
If the answer is anything other than an unequivocal "no," please provide complete details (on a separate sheet, if necessary):

☐ Yes ☐ No

Does the Applicant, any owner, any employee of the Applicant, or any present or former principal officer have any family relationships with current members of a government department, agency or instrumentality, or any official or employee thereof?

☐ Yes ☐ No

For each "Yes" answer, provide complete details:

Is the Applicant, any owner, any employee of the Applicant, or any present or former principal officer an official of any political party or candidate for political office?

☐ Yes ☐ No

For each "Yes" answer, provide complete details:

Is the Applicant, any owner, any employee of the Applicant, or any principal officer employed by, or provide services to, any potential customer of the product(s) for which you are being retained by Crane NXT to promote?  
If "Yes," provide name of customer and positions held and a written approval by the chief executive officer of the customer, including confirmation that local law or custom permits such dual activity:

☐ Yes ☐ No

#### Operations

Describe briefly the nature and history of Applicant's business.



If Applicant is an individual, please provide resume.

If Applicant is an Entity, please provide copies of Company's business registration and shareholder information, Company brochures, annual reports and any other documentation deemed appropriate, including latest fiscal balance sheet and operating statement hereto.

| Names/titles of principal individuals who will provide service                                                                   | Education | Employment Background |
|----------------------------------------------------------------------------------------------------------------------------------|-----------|-----------------------|
|                                                                                                                                  |           |                       |
|                                                                                                                                  |           |                       |
|                                                                                                                                  |           |                       |
|                                                                                                                                  |           |                       |
| General Background                                                                                                               |           |                       |
| Description of Branch offices, if any:                                                                                           | Location  | % of Total Sales      |
|                                                                                                                                  |           |                       |
|                                                                                                                                  |           |                       |
|                                                                                                                                  |           |                       |
| Describe the Applicant's sales department (headcount, experience, and special qualifications such as engineering degrees, etc.): |           |                       |
|                                                                                                                                  |           |                       |
| List previous or current relationships, if any, with Crane NXT or its affiliates:                                                |           |                       |
|                                                                                                                                  |           |                       |

| Market Information                                                                                                   |                        |                                                          |       |       |
|----------------------------------------------------------------------------------------------------------------------|------------------------|----------------------------------------------------------|-------|-------|
| For which products or services does Applicant wish to represent with Crane NXT?                                      |                        |                                                          |       |       |
|                                                                                                                      |                        |                                                          |       |       |
| Estimate the <u>total</u> available market value (in USD) in the territory for the products or services              |                        |                                                          |       |       |
|                                                                                                                      |                        |                                                          |       |       |
| Will end-users potentially include foreign governments or state-owned enterprises?                                   |                        | <input type="checkbox"/> Yes <input type="checkbox"/> No |       |       |
| Estimate the potential sales (in USD), Applicant expects to generate, in the territory for the products or services: |                        |                                                          |       |       |
| During the first year                                                                                                | During the second year | During the third year                                    |       |       |
|                                                                                                                      |                        |                                                          |       |       |
| Provide any other relevant market information, such as competition, barriers to entry.                               |                        |                                                          |       |       |
|                                                                                                                      |                        |                                                          |       |       |
| Other Companies Represented                                                                                          |                        |                                                          |       |       |
| Principal Contact                                                                                                    | Entity                 | Address                                                  | Email | Phone |
|                                                                                                                      |                        |                                                          |       |       |
|                                                                                                                      |                        |                                                          |       |       |
|                                                                                                                      |                        |                                                          |       |       |
|                                                                                                                      |                        |                                                          |       |       |
|                                                                                                                      |                        |                                                          |       |       |
|                                                                                                                      |                        |                                                          |       |       |

| References                                                                             |        |         |       |       |
|----------------------------------------------------------------------------------------|--------|---------|-------|-------|
| List <u>General</u> References (persons/firms familiar with applicant's organization): |        |         |       |       |
| Principal Contact                                                                      | Entity | Address | Email | Phone |
|                                                                                        |        |         |       |       |
|                                                                                        |        |         |       |       |
|                                                                                        |        |         |       |       |
|                                                                                        |        |         |       |       |

| List <u>Financial</u> References (indicate banks, principal suppliers, etc.)                                                                                                                                                                                                                                                                                                                                                                                             |         |       |       |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|-------|-------|
| Entity                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Address | Email | Phone |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |         |       |       |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |         |       |       |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |         |       |       |
| Other Pertinent Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                 |         |       |       |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |         |       |       |
| <p>I understand that this information will be relied upon in determining whether to enter into any contractual agreement with the applicant, and that any false or misleading information provided by the Applicant would be grounds for the immediate termination of any such contractual agreement. I further certify that the information is current as of the signature date.</p> <p>Applicant agrees to notify Crane NXT within 30 days of any material change.</p> |         |       |       |
| Completed By (signature):                                                                                                                                                                                                                                                                                                                                                                                                                                                |         |       |       |
| Name (printed):                                                                                                                                                                                                                                                                                                                                                                                                                                                          |         |       |       |
| Title:                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |         |       |       |
| Date:                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |         |       |       |

**Attachment D**  
**ANTI-BRIBERY CERTIFICATION**

*The Business Unit should insert the Third Party's name; The Third Party must sign the certification.*

[Insert Name], which is entering into a business relationship with Crane NXT or its affiliates (hereinafter "Crane NXT"), hereby, as appropriate, represents warrants, affirms, and agrees that:

1. None of the principals, officers, or employees of [Insert Name] is a government official, an official of any public international organization, a political party official, or a candidate for political office. For purposes of this Certification, "government official" includes: (a) any officer or employee of a national, regional, or local government; (b) any officer, employee, or representative of a government department, agency, or instrumentality; (c) any individual acting in an official capacity for a government entity; (d) any officer or employee of a state-owned or state-controlled enterprise; (e) any official or employee of a public international organization (e.g., the United Nations, World Bank); and (f) any political party official or candidate for political office.
2. All the information that [Insert Name] has provided to Crane NXT and its representatives in connection with Crane NXT's retention of [Insert Name] was and remains current, accurate and complete.
3. [Insert Name] will obtain written approval from Crane NXT before [Insert Name] hires subagents, and no subagent will be approved unless due diligence is completed and that subagent agrees in writing to these same terms and conditions.
4. In connection with its representation and work on behalf of Crane NXT, [Insert Name] shall not give, offer or promise to give, or authorize the giving directly or indirectly through any other person or firm, of any money or thing of value to any other person or organization, including any official of any government, employee or official of any public international organization, any political party or official or employee of such party, or any candidate for political office, for the purpose of inducing or rewarding favorable action or the exercise of influence by such official, party or candidate in any governmental matter.
5. In connection with its representation and work on behalf of Crane NXT, [Insert Name] shall not give, offer or promise to give, or authorize the giving directly or indirectly to or through any person or firm, of any money or thing of value to any person or organization as an inducement or reward for the party or representative doing or forbearing to do any act in relation to the business or affairs of Crane NXT or [Sales Representative], or for showing or forbearing to show favor or disfavor to any person in relation to the business or affairs of Crane NXT or [Insert Name].
6. [Insert Name] will provide documents and information to Crane NXT, upon request, confirming [Insert Name]'s compliance with this agreement, and will allow Crane NXT (or its agents) to review [Insert Name]'s books and records with respect to the work performed on behalf of Crane NXT at any time.
7. If there are any additional owners in, or change in the ownership of, [Insert Name], [Insert Name] shall notify Crane NXT of the identity of the new owner(s) as soon as possible. Crane NXT may terminate its agreements with [Insert Name] if Crane NXT disapproves of such new owners. [This clause does not apply to natural persons. For publicly traded companies, this clause would apply only in the event a new owner or group of owners should acquire 5% or more of the third party.]
8. This certification is being provided to Crane NXT in connection with Crane NXT's decision to enter or continue a business relationship with [Insert Name]. If [Insert Name] violates any of the terms of this agreement, Crane NXT shall have the option to terminate its contract with [Insert Name], notwithstanding any other provision of Crane NXT's contract with [Insert Name] to the contrary. Moreover, [Insert Name] shall forfeit any commissions owed, or any other payments, to it by Crane NXT upon an admission or finding that [Insert Name] has failed to comply with any of the terms of this Certification.
9. [Insert Name] is not permitted to offer gifts/hospitality to Crane NXT customers without prior approval.

\_\_\_\_\_

Date

\_\_\_\_\_

Signature

## Appendix E

The following matrices summarize approval thresholds for entertainment, hospitality, and gift-giving. These matrices supplement (but do not replace) the rules described in Sections 4.f and 4.h.

### 1. Quick Decision Checklist (Before Offering Anything of Value)

Before offering anything of value, confirm the following:

| Test                                           | Description                                                                                                                                                                                        | (Y/N) |
|------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| <b>1. Legitimate Business Purpose</b>          | The expense or gift directly supports a clear, bona fide business purpose.                                                                                                                         |       |
| <b>2. Modest &amp; Appropriate Value</b>       | The value is modest, not extravagant, and aligns with local business norms.                                                                                                                        |       |
| <b>3. Allowed Under Appendix E</b>             | The expense fits within the thresholds and approval rules in Appendix E.                                                                                                                           |       |
| <b>4. Transparency Test</b>                    | You would be comfortable if the expense were reviewed by Legal, Finance, Audit, the BU President, or senior leadership.                                                                            |       |
| <b>5. Public Disclosure Test</b>               | You would not hesitate if this was disclosed publicly, in email, or in the media.                                                                                                                  |       |
| <b>6. No Risk of Improper Influence</b>        | A reasonable person would <i>not</i> view the expense as intended to influence a business decision.                                                                                                |       |
| <b>7. Documented &amp; Approved in Advance</b> | You have: <ul style="list-style-type: none"><li>• Required pre-approvals,</li><li>• A clear business purpose,</li><li>• An attendee list, and</li><li>• Receipts (no matter the amount).</li></ul> |       |

If you answer “No” to any item above, **STOP and consult the Legal Department.**

## 2. Entertainment and Hospitality Approval Matrix

| Entertainment and Hospitality                                                                                                                                                 | Required Approval <sup>2</sup>                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                 |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                               | Non-Government Party                                                                                                                                                                                                                                                                                                                                                                                          | <u>Special Rules:</u><br>Foreign Public Official <sup>3</sup>                                                                                                                                                                                                                                                                                                                                   |
| Cash or Cash Equivalents (e.g., gift cards, prepaid credit cards)                                                                                                             | <b>Prohibited</b>                                                                                                                                                                                                                                                                                                                                                                                             | <b>Prohibited</b>                                                                                                                                                                                                                                                                                                                                                                               |
| Lavish (e.g., high-cost, luxury, premium, or excessive items that exceed local standards of modest business hospitality)                                                      | <b>Prohibited</b>                                                                                                                                                                                                                                                                                                                                                                                             | <b>Prohibited</b>                                                                                                                                                                                                                                                                                                                                                                               |
| Up to USD 250/person                                                                                                                                                          | <b>Pre-Approval:</b> Direct Manager                                                                                                                                                                                                                                                                                                                                                                           | <b>Pre-Approval:</b> Direct Manager                                                                                                                                                                                                                                                                                                                                                             |
| USD 250/person - USD 500/person                                                                                                                                               | <b>Pre-Approval:</b> Direct Manager and Functional VP (e.g., Sales)                                                                                                                                                                                                                                                                                                                                           | <b>Pre-Approval:</b> Direct Manager; Functional VP (e.g., Sales); and BU President                                                                                                                                                                                                                                                                                                              |
| Greater than USD 500/person                                                                                                                                                   | <b>Pre-Approval:</b> Direct Manager; Functional VP; and BU President (or delegate)                                                                                                                                                                                                                                                                                                                            | <b>Prohibited;</b> unless contractually required and approved by BU President, with Legal Department review as applicable                                                                                                                                                                                                                                                                       |
| Group recreational activities (e.g., golf outings, sporting events) that are business-related involving customers and Crane NXT associates and exceeds USD 2,000 in aggregate | <b>Pre-Approval:</b> Direct Manager; Functional VP; and BU President (or delegate)                                                                                                                                                                                                                                                                                                                            | <b>Pre-Approval:</b> Direct Manager; Functional VP; and BU President                                                                                                                                                                                                                                                                                                                            |
| Payments for transportation (other than in-country transport) and lodging                                                                                                     | <ol style="list-style-type: none"> <li><b>Pre-Approval:</b> Direct Manager, Functional VP and BU President (or delegate)</li> <li>Written statement from the customer must be obtained stating that any transportation and/or lodging expenses paid for by Crane NXT are permitted by the recipient's organization, including compliance with the laws and regulations of the recipient's country.</li> </ol> | <ol style="list-style-type: none"> <li><b>Pre-Approval:</b> Direct Manager, Functional VP and BU President</li> <li>Written statement from the customer must be obtained stating that any transportation and/or lodging expenses paid for by Crane NXT are permitted by the recipient's organization, including compliance with the laws and regulations of the recipient's country.</li> </ol> |

*Note: All approvals must be obtained in advance and documented. Where requirements are unclear or involve U.S. government officials, employees must consult the Legal Department before proceeding.*

<sup>2</sup> When an approver holds multiple roles in the approval chain, the next-higher authority must approve.

<sup>3</sup> A Foreign Public Official is generally defined as any person who holds a legislative, administrative, or judicial position in a foreign country, or who performs a public function for a foreign government or public agency, including state-owned enterprises and public international organizations.

### 3. Gift Approval Matrix

| Gift                                                                                                                                                                                         | Required Approval <sup>4</sup>                                                     |                                                  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|--------------------------------------------------|
|                                                                                                                                                                                              | Non-Government Party                                                               | <u>Special Rules:</u><br>Foreign Public Official |
| Cash or Cash Equivalents (e.g., gift cards, prepaid credit cards)                                                                                                                            | Prohibited                                                                         | Prohibited                                       |
| Alcohol (all recipients)                                                                                                                                                                     | Prohibited                                                                         | Prohibited                                       |
| Specimen banknotes (clearly marked, non-circulating, and of nominal value)                                                                                                                   | No approval required                                                               | No approval required                             |
| <u>Promotional</u> gifts (i.e., include the Company's brand, logo) up to USD 250 per gift/per person                                                                                         | No approval required                                                               | No approval required                             |
| <u>Non-promotional</u> gifts up to USD 250 per gift/per person. <i>Non-promotional gifts must not be intended to influence any business decision or secure an improper advantage.</i>        | No approval required                                                               | Prohibited                                       |
| <u>Non-promotional</u> gifts greater than USD 250 per gift/per person. <i>Non-promotional gifts must not be intended to influence any business decision or secure an improper advantage.</i> | <b>Pre-Approval:</b> Direct Manager; Functional VP; and BU President (or delegate) | Prohibited                                       |

All approvals must be obtained in advance and documented. Gifts must be reasonable, infrequent, accurately recorded, and compliant with local law. Where requirements are unclear or involve U.S. government officials, consult the Legal Department before proceeding.

<sup>4</sup> When an approver holds multiple roles in the approval chain, the next-higher authority must approve.