

# Badger Meter Code of Conduct 2025/2026



**Kenneth C. Bockhorst**  
Chairman, President and  
Chief Executive Officer



The Badger Meter Code of Conduct helps us understand how to operate our business ethically, with integrity and aligned with our Value of Trust.

## A Message from our Chief Executive Officer

This Code of Conduct (the “Code”) sets forth our fundamental commitment to conducting business ethically and honestly, in line with our value of Trust. Trust is one of our most valuable assets – and it’s one of the most fragile. One incident, one news story, one careless comment, and the trust we’ve worked so hard to earn can be lost.

That’s why the way we conduct our business is as important as the products and solutions we offer. Our Code of Conduct provides us with the guidance, resources and the information we need to operate our business responsibly, to take accountability and do the right thing, even when the right thing might be difficult.

Taking personal responsibility for actions is critical to our success, and the leadership team and I trust you to take the time to read, understand and then live this Code of Conduct. It is important that you know the policies and guidelines that you are required to follow, and use them as a guide when making decisions that affect Badger Meter. That is why we provide annual compliance training and ask you to sign a commitment statement that you have read, understand and will act in compliance with the Code.

Thank you for continuing to live our values each and every day. I look forward to working with you to make our company the best it can be.

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This Code of Conduct does not cover every situation throughout the world that employees may encounter. It is a guide to certain behavior and the application of good judgement to aid you in reaching the right decisions.

## Our Commitment

### Application of the Code

At Badger Meter, each one of us is expected to live our values and abide by the principles outlined in this Code of Conduct.

As a global company, and one publicly traded on the New York Stock Exchange, there are a variety of laws, regulations and global standards that apply to all of us. In addition, we are committed to following the local laws of each location where we do business. We expect you to follow both the letter and the spirit of the law. Where local laws may conflict with our Code or values, you should seek input from the Legal Department.

This Code of Conduct applies to all employees (regular or part-time), contractors, executives and our Board of Directors. It is a living document - just as we strive to continually improve our performance, we are continually improving and updating this Code of Conduct.

The information in this Code is supplemented by a variety of policies across the company. Remember that this Code offers general guidelines, it is not intended to be all inclusive.

### Our Values

Our Core Values are the heart of our culture and guide everything we do. Our Trust value calls for all of us to act honestly, ethically and with integrity. We want to do what is right. In deciding what is right, we need to ask ourselves:

- Is it legal, ethical and socially responsible?
- Does it follow company policy?
- Could I defend my decision if it were to become known internally or publicly?

If you can't definitively answer "yes" to these questions, make a different choice or seek guidance from your manager, HR or Legal. The century-plus reputation of Badger Meter is depending on you.







# Workplace Conduct

## Speaking Up

An essential part of operating with trust is taking action when you believe the law, our Code, contracts, policies or internal controls may have been violated. You should speak up if:

- You are unsure about the proper course of action and need advice.
- You believe that someone acting on behalf of, or in support of, Badger Meter is doing—or may be about to do—something that violates the law or our Code.
- You believe that you may have been involved in misconduct.

Speaking up provides the company with information that is necessary to remedy a potentially harmful situation. While you may be reluctant to get involved, failure to report a concern could have substantial consequences—financial or reputational damage to Badger Meter, employee injury or criminal action. When in doubt, SPEAK UP.

No one will suffer any adverse effects to their job or career as a result of raising a concern or questioning the ethics of a company practice. We will not tolerate retaliation in any form for raising concerns or making good-faith reports. All reports of violations will be addressed promptly. Concerns such as fraud, bribery, theft, trade violations, or concerns for which you

### Resources

- Your manager
- Department head
- Human Resources
- Ethics Hotline
- Compliance Officers:
  - VP-General Counsel
  - VP-Controller

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### Ethics Hotline

[badgermeter.ethicspoint.com](http://badgermeter.ethicspoint.com)

- Anonymous
- Accessed through internet or phone
- Posters in multiple languages within each facility

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### Mail

P.O. Box 245036  
Milwaukee WI 53224

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**See Appendix for detailed contact information**

require confidentiality, should be reported via the Ethics Hotline. However, other concerns such as discrimination, sexual harassment, bullying, or job performance should first be conveyed to your manager/supervisor, then if needed your department head and then the Human Resources Department, before making a Hotline report or contacting the Compliance Officers.

There are a variety of resources available to assist in discussing and reporting concerns. Confidentiality of reporters will be maintained, and report content will be limited to the extent consistent with the best interests of the employees involved, our company, and our obligations under the law.

The VP-Human Resources, the VP-General Counsel & Secretary and VP-Controller have full discretion to:

- Determine the extent to which reported issues are investigated, including whether investigations occur at the corporate, operational or other levels;
- Consider investigations closed; and
- Decline to reopen previously reported, investigated and closed ethics issues unless new information is presented that justifies further investigation.

## Promoting a Positive Workplace and Respecting Others



Badger Meter is committed to fostering a workplace that is safe and professional and that promotes teamwork, inclusiveness and trust. This includes our commitment to providing equal opportunities for all persons.

### Valuing Diversity and Promoting Inclusion

As noted in our Collaboration value, we leverage diverse perspectives, and treat everyone with dignity. We are committed to equal opportunity and fair treatment for all. Badger Meter prohibits discrimination on the basis of age, race, gender,

religion, national origin, disability, citizenship, marital status, veteran status, sexual orientation, gender identity and other protected group-status.



Our policies, including our Human Rights Policy, ensure that all personnel actions, such as recruitment, hiring, promotion, training, benefits and compensation, are undertaken in accordance with the principles of equal employment opportunity.

### Preventing Harassment and Bullying

Acts of harassment will not be tolerated. This includes any conduct or statements made on the basis of protected status or that are intimidating, hostile or abusive. Examples include:

- Unwelcome conduct—whether verbal, physical or visual and whether in person or other means (e.g. email)—that is based on a person's protected status
- Racial, ethnic, religious or sexual jokes
- Abusive language, intimidation, undermining or deliberately impeding a person's work
- Physical aggression or other violent acts including bullying, stalking or threatening comments
- Unwelcome sexual advances or requests for sexual favors
- Any other actions that unreasonably disrupt or interfere with an employee's work performance

This extends to third parties interacting with Badger Meter employees, including customers, suppliers, consultants, distributors, agents or factory representatives, among others.

We expect our suppliers to comply with our Supplier Code of Conduct which includes, among other items, their commitment to treating all workers with dignity and respect. If you suspect supplier behavior that fails to meet that code, inform your manager or Legal.

# Protecting our Employees and the Environment

The Responsibility value at Badger Meter speaks to our commitment for ensuring the safety and caring of employees, our communities and the environment.



## Workplace Safety

We are committed to promoting both physical well-being and positive mental health, and providing our employees with a safe and secure work

environment. Safety is especially important in manufacturing locations which are subject to significant workplace safety regulations.

- We comply with all health and safety laws, as well as our own health and safety policies that go beyond what the law requires.
- Each work location has site-specific safety rules that must be followed at all times.
- The work environment must be free of illegal or controlled substances that could impair judgement on the job.
- No weapons or potentially dangerous devices are allowed on premises.
- We have guest and visitor policies that must be followed.

All of our employees and anyone working on our premises are trained on and expected to know the health and safety protocols at their location. All safety concerns should be reported to your manager, HR, site safety personnel or the Ethics Hotline.

## Respecting the Environment

We strive to eliminate harmful environmental impacts by minimizing our emissions, waste and water usage and engaging in responsible business practices.

A few simple guidelines we can apply daily include:

- Conserve water and minimize waste.
- Recycle materials that cannot be eliminated.
- Properly dispose of hazardous waste.
- Reduce greenhouse gases by using energy efficiently, e.g. turn off office lights and electrical devices when not in use.
- Minimize packaging.



## Product Quality and Safety

Badger Meter seeks the highest product quality, safety and performance at all times. Our business, reputation and success depend on our commitment to compliance with government and industry standards and customer specifications.

All records regarding quality matters must be accurate and complete. If you suspect or become aware of a product quality or safety issue, report it to your manager, HR, Legal, Compliance Officers or the Ethics Hotline.



## Business Conduct

Badger Meter maintains a number of important policies and processes that govern our business conduct around the globe.

### Conflicts of Interest

Every day, many of us work with customers, suppliers and others who do business with Badger Meter. It is critical that each decision, and any related action, be based on the needs of the company—not on personal interests or relationships. Actual conflicts must be avoided, but even the appearance of a conflict of interest can be harmful.

Most conflicts can either be avoided or resolved easily if they are disclosed. If you are ever in doubt about whether an activity may create a conflict of interest, please seek guidance from your manager, HR, Legal or the Compliance Officers.

#### Side Work (second job or business)

Work outside of Badger Meter, whether at another employer or pursuing your own business (compensated or not), must never interfere with your job duties and responsibilities. If you are considering side work, it should be cleared in advance by your manager, as well as HR and Legal. Any side work must not involve a Badger Meter competitor, customer or supplier, create a conflict of interest or utilize company property such as vehicles, software, computers, phones or worksites.

### Potential Conflicts of Interest

- Owning a substantial financial interest in a business that seeks to do business or competes with Badger Meter.
- Having a business or financial relationship with customers, suppliers or competitors that could influence or appear to influence job responsibilities.
- Marketing or selling products or services that compete with Badger Meter.
- Work activities of close relatives can also create potential conflicts that should be reported.

### Family and Personal Relationships

You should not hire, supervise or have influence over a family member or close friend within the company unless your supervisor and HR provide prior approval.

### Political Activity, Contributions and Lobbying

We support employees who wish to take part in the political process, but they must do so on their own time and not use company resources. We encourage respectful dialogue about diverse viewpoints, but please refrain from engaging in political discussions that disrupt work or create a hostile environment. Employees may not make any direct or indirect political contribution or expenditure on behalf of Badger Meter.



Lobbying is subject to specific rules and covers many kinds of activity. Only authorized personnel may be engaged in lobbying activities on behalf of Badger Meter which includes:

- Contacts with local government officials, legislators, regulators, executive branch official, or their staffs.
- Government contract sales.
- Efforts to influence legislative or administrative action Questions should be directed to Legal or the Compliance Officers.

Questions should be directed to Legal or the Compliance Officers.

## Gifts and Business Entertainment

Badger Meter recognizes that gifts, meals and entertainment are a part of ongoing business relationships we have with customers, suppliers, competitors and, at times, other employees. Simply stated, gifts and entertainment means anything of value. Business gifts and entertainment can build goodwill, but they can also make it harder to be objective about the person providing them. Consequently, gifts and entertainment can create their own conflicts of interest.



### Business Entertainment

Modest and appropriate meals and entertainment may be accepted or provided by Badger Meter employees if the primary purpose is business-related.

The employee, as well as the customer, supplier, contractor, etc. must be present; otherwise, it must be treated as a gift.

### Gifts that are NEVER Acceptable

- Any gift that would be illegal or result in violation of the law.
- Any gift of cash or cash equivalent including gift cards or certificates.
- Any “quid pro quo” gift requiring something in return.
- Participation in entertainment considered inappropriate, sexually-oriented, or otherwise violates our commitment to mutual respect and integrity.

### Giving and Accepting Gifts

Whether Badger Meter is the giver or recipient, to ensure we do not create a perception of impropriety, gifts and entertainment must be:

- Infrequent and not excessive in value,
- Never in cash,
- Never tied to a potential contract or business tender,
- Reported in accordance with our gifts and entertainment policy,
- Less than \$50 per year, unless approved by your supervisor as proper and business related (in which case such gift(s) must not exceed a value of \$100 per day up to a cumulative maximum of \$300 per year per gifting entity). Gifts beyond these limits are generally discouraged and require CEO approval.

### Gifts and Entertainment to Government Employees

Offering gifts or entertainment to government employees raises special risks. Under no circumstances may Badger Meter employees offer gifts, meals or entertainment to any government employee without proper authorization. Even small gifts may be considered illegal. Never offer, provide or accept gifts or entertainment without prior written consent of Legal.



## Doing Business with Integrity

The reputation of Badger Meter depends on doing business honestly. We forbid bribery and believe in being respectful of the laws of international trade and competing fairly.

It is important to identify and accommodate the differences between international markets and those in the US. Whenever we do business in foreign countries, we encounter laws which may vary widely or, on occasion, conflict with one another. Local customs and practices with regard to business and social dealings may also vary from country to country.

Our policy is to comply with all laws which apply in the countries where we do business. In countries where common business practices might be less restrictive than those outlined in our Code of Conduct, we will follow our code.

### Bribery Prohibited

At Badger Meter, we compete based on our products, services, quality, pricing and reputation. We forbid offering or accepting bribes or other unlawful payments. Bribes can take many forms including:

- Money, gifts or gratuities.
- Kickbacks.
- Unwarranted rebates or excessive commissions.
- Unusual or disguised allowances, expenses or political or charitable contributions.
- Offering jobs to customers, their family or friends.

Badger Meter also prohibits any employee, consultant or other agent acting on behalf of the company from directly or indirectly engaging in a bribe. An example would be paying money, giving a gift or providing entertainment to an employee of a customer (without direct knowledge of the customer) hoping that the employee will influence the customer to purchase our products or services. The Foreign Corrupt Practices Act (FCPA), UK Bribery Act, and other anti-bribery and corruption ("ABAC") laws prohibit the payment of any money or anything of value to a foreign official, foreign political party (or official thereof) or any candidate for foreign

**In countries where common business practices are less restrictive, we will follow the Badger Meter Code of Conduct.**

political office for purposes of obtaining, retaining or directing business. These restrictions also apply to consultants and agents acting on our behalf.

### International Trade Compliance

We are committed to compliance with all applicable international trade laws and regulations, including those that govern the import and export of goods, software, technology, technical data and services across borders, and customs management, tariff classification, registrations, licensure, finance and sanctions.



### Contraband/Money Laundering

Trading in products in violation of the law has different names such as "contraband," "smuggling" or "tax evasion." We will not facilitate or support contraband or money laundering, and we will help Governments prevent illegal trade involving our company's products. We do this by:

- Specifying acceptable forms of payment.
- Requiring all payments to be the currency of the invoice.
- Prohibiting third-party payments except in limited cases.
- Requiring compliance with all reporting and recording rules, such as reporting cash transactions over \$10,000.

In addition, Badger Meter exercises due diligence in knowing who our potential customers and business associates are by:

- Assessing the integrity of potential customers or suppliers.
- Communicating with customers about our compliance expectations.
- Being aware of and complying with our customers' business practices.
- Refusing to do business with and providing no assistance to those suspected of wrongdoing related to our products in particular.

Report suspicious transactions or activities by any customer or supplier to Corporate Legal.

### Imports

Import rules must be followed when our company imports products and materials (and by our customers and partners who have their own importation rules). Please review the company's related policies and procedures if you deal with imports. If you have any doubt about a pending situation, consult our Trade Compliance team, Compliance Officers or Legal.

### Exports – Trade Controls, Political and Economic Sanctions

Many types of commercial data, products, software and technical data must not be exported without prior approval from the US Government. As a global company, we are responsible for ensuring that items sold are not diverted to restricted countries, entities or individuals.

The US, the European Union, the United Nations, and other jurisdictions periodically impose prohibitions or other restrictions on export and trade dealings with certain countries, entities and individuals. Trade restrictions can include bans on exports directly to a sanctioned country or transshipments through a non-sanctioned country to a sanctioned country, or vice versa. Things that you might not think of as exports include:

- Conversations of a technical nature with a citizen of another country—even when the foreign citizen is in the US.
- Data or information attached to or included in an email or text sent to a recipient outside the US.
- When foreign visitors tour our facilities, what they see can be considered an export.

International laws related to trade sanctions and boycotts are complex and can be confusing. If you are unsure of a pending situation that may be considered an export, you should consult our Trade Compliance team or Legal.

### Compete Fairly

Badger Meter is committed to a fair global market. In all dealings with competitors, customers and suppliers we must act honestly, impartially and in compliance with fair competition laws and regulations. Employees working in marketing, sales and purchasing must be especially aware of the applicable laws and regulations in the countries where they do business.

#### For Fair Competition Avoid:

- **Price Fixing** – competitors coordinating prices instead of competing independently.
- **Dividing Territories** – competitors agreeing to divide customers, products or geographical areas, including agreeing on quota limits or market share.
- **Bid Rigging** – competitors agreeing to coordinate bids or engaging in collusive tendering.
- **Abuse of Market Power** – abusing a large market share position to engage in predatory practices like price gouging.

What we may not do directly may not be done by acting through a third-party.

Badger Meter encourages employee participation in industry trade associations, but employees should be mindful that discussions with competitors that involve pricing or market information must be avoided, and that care should be taken in any process which fixes industry standards. Where possible, meetings should be conducted in the presence of a qualified moderator or legal professional.

Given the complexity of competition laws and regulations, contact Legal for guidance if you have questions.

## Financial Integrity

Badger Meter is committed to accurate and timely financial records and dealings. We prohibit any actions that may obscure our financial activities from our stakeholders.

### Financial Accounting, Recordkeeping and Reporting

Badger Meter is committed to fair, accurate, timely and transparent financial accounting, recordkeeping and reporting. All Badger Meter financial records must be:

- Complete and accurate.
- Property documented.
- Fair and objective.
- Shared only with proper authorization.

### Financial Executives

- Financial officers and other finance managers have an incremental responsibility for accurate books and financial disclosures.
- The Financial Executives Code of Conduct outlines additional expectations of senior financial personnel above and beyond the guidelines in this Code of Conduct.

This obligation includes more than financial information. Every employee must help ensure that reporting of any business information of whatever kind (financial or otherwise) and in whatever form (computerized, paper or otherwise) is accurate, complete and timely. This requires, among other things, accurately recording costs, sales, time sheets, invoices, payroll records, regulatory data and other essential company information.

**If you are asked by anyone, including your manager or a Vice President, to falsify any information, you should immediately contact Corporate Legal and/or utilize the Ethics Hotline**

### Fraud

Badger Meter employees are expected to be truthful and forthright in all interactions and communications. Engaging in fraud, which is the act of intentionally cheating, stealing, deceiving or lying is prohibited and generally criminal. Intentional acts of fraud are subject to strict disciplinary action. It's important to understand what fraud entails so you can recognize and avoid it. Examples of fraudulent activity include:

- Deliberately making a false entry in a report or record, such as submitting a false expense report.
- Misusing company property.
- Inflating sales by shipping defective inventory.
- Altering or destroying company records (except as authorized by established policies and procedures).
- Selling assets without proper documentation and authorization.
- Misleading the internal or external auditors.



## Insider Trading

We are committed to maintaining a fair market for buying and selling company stock, and prohibit stock purchases or sales based on inside information.

It is also illegal and unethical to provide confidential, non-public information about Badger Meter to other individuals or companies so that they may gain. We also prohibit trading in the stock of customers and suppliers based on inside information.

If you have any questions or concerns about your responsibilities under insider trading laws, contact Legal.

## Protecting and Managing Property, Information and Records

Our physical assets and intellectual property are vital to the Badger Meter business and we have a duty to protect them. We must responsibly manage and protect company records, property and proprietary information belonging to our company, business partners, customers and employees.



### Physical Assets and Communication Systems

Every employee is responsible to help ensure that our physical property—such as buildings, vehicles, equipment, IT systems, inventory and supplies—are not damaged, misused, lost, stolen or otherwise improperly handled. The company may hold you responsible for all costs and expenses associated with company property that is not returned immediately or returned in unacceptable condition after your employment with the company ends. Property is to be properly identified, maintained and tracked.

### Examples of Inside Information

- Introduction of a new/innovative product.
- Negative information about an existing product.
- Significant new contract wins.
- Sales plans/forecasts.
- Pending acquisitions.
- Litigation/warranty claims.
- Customer or supplier developments that will impact market.

Communication systems provided by Badger Meter—including email, text messaging, phone calls, and internet access—are the property of the company and must be used appropriately and legally. Do not access, download, store or distribute any material that is illegal, offensive or could reflect negatively on the image and reputation of Badger Meter. Storing personally-identifiable or private confidential information on company property is strongly discouraged. Do not forward company emails to your home/personal email account. Exercise care to ensure all communications are professional and appropriate.

Badger Meter has a policy on using personally owned devices for business purposes (Bring Your Own Device Policy 753-915) that permits such use only for certain applications and explicitly pre-approved devices and instances (through our BYOD approval form). All company data that is stored, transferred or processed on a personal device will remain under the company's ownership, and the company will retain the rights to access such devices and control such data even though it is not the owner of the device.

All communications, data and information sent, received, created or stored using company property (or via your personal device that is being used for company business) while you are employed at Badger Meter belong to the company and are not

considered private. Badger Meter owns and/or controls access to all communications equipment including computers, software, email, voicemail and office supplies. Where permissible, Badger Meter reserves the right to monitor all communications, including internet usage and employees should not consider such communications to be personal or private.

## Information Security

Understanding the role of cybersecurity in protecting our customers, their data, as well as our internal data and systems is critical. Speak up if you see an actual or potential cybersecurity issue, and follow all internal cyber security practices. Regarding Artificial Intelligence (AI), the company has an AI Acceptable Use policy that requires formal pre-approval before using AI for your work, any other business purpose, or while using any business device. Contact Legal for more information.

## Proprietary Information and Intellectual Property

Employees have access to and become knowledgeable about information which is valuable—referred to as “proprietary information.” We are all responsible for protecting the confidentiality of such information.

Use or disclosure of proprietary information must be for company purposes only and not for personal benefit or the benefit of competing interests. It should be limited only to those inside or outside the company who have a legitimate need to know. If you are unclear about what can be disclosed, contact Legal.

Anyone possessing proprietary information may be required to sign a non-disclosure agreement (NDA) to ensure the confidentiality of the information both while they are employed and after they leave the company.



## Safeguarding Proprietary Information

### Examples of proprietary information:

- Business/financial plans
- Customer lists
- Marketing/pricing strategies
- New product launches
- Personnel records
- Acquisition targets

### How you can protect this information:

- Log out, shut down or lock your computer when unattended
- Do not share passwords or access cards
- Don't allow unauthorized individuals into worksites
- Accompany all visitors
- Don't leave information out in your work area, conference room or printer
- Protect property from loss/theft

## Records Management

Managing records and information is essential to our business and requires great care. There are four basic principles to guide us:

- Maintain records as required by law.
- Maintain accurate records—providing false or misleading records, or altering them, is wrong under any circumstances and could constitute a serious violation of law.
- Retain any records related to litigation or an investigation; if an investigation or litigation is pending or anticipated, certain records (including electronic records) must be maintained.
- Know and follow our records management policies. Ask your supervisor, HR or Legal for more information.

## Data Privacy

### Definition of Personal Information

For purposes of the Code, “personal information” means information that alone or in combination identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. This includes information about employees, business contacts, website visitors and consumers that are end-users of certain Badger Meter software products.



### Badger Meter Data Protection Principles

**Data Minimization** – Only collect the amount of personal information you need to perform a relevant activity or task.

**Updated Data** – Regularly update personal information that you collect.

**Privacy Statement** – Your use and collection of personal information must comply with the Badger Meter Global Privacy Policy on the website.

### Security and Data Governance Policies –

You must only use and access personal information in accordance with the privacy and security policies and procedures of Badger Meter, including access controls and retention policies.

**Disclosure** – Only disclose personal information internally or with third parties that is necessary to perform the relevant activity or task.

## Employees

Personal employee information will not be purposefully provided to anyone outside of Badger Meter without required appropriate authorization unless otherwise legally-required, which will be confirmed by Legal.

Badger Meter respects the confidentiality of our employees’ personal information. This means that access to personal records is limited to company personnel who have appropriate authorization and a clear business need for that information.

Employees who have access to personal information must treat it appropriately and confidentially. Any questions or concerns should be shared with Legal. While Badger Meter is committed to maintaining employee confidentiality, this is not a license to engage in inappropriate personal activities at work. Badger Meter, as governed by law, has the right to access and review all communications, records and information created at work, while working or with company resources.

Badger Meter is committed to complying with privacy laws governing employee personal information. Please review the employee privacy policy for information regarding these rights as well as the collection, use and disclosure of employee personal information at Badger Meter.

## Customers

Badger Meter has a responsibility to protect the privacy of information that customers entrust to us. Employees who do not have a business reason to access this information must not do so, and those who do have legitimate access should take steps to protect against the unauthorized release or use of private customer information including monitoring compliance of outside parties who may be given access to this information. Some examples are:

- Confidential financial information.
- Confidential credit reports.
- Credit card transactions.
- Any customer/end-user’s information.
- Any consumer data Badger Meter processes on behalf of our utility customers, such as a consumer’s name, address and water usage



## Data Protection – Dealing with Vendors or Consultants

To ensure protection of confidential and proprietary information, a signed NDA is required from all vendors or consultants working with confidential and proprietary information prior to their dealings with Badger Meter. An NDA template is available from Legal (or in the case of standard suppliers, the Purchasing Department). Agreements for dealings with any third party where confidential or proprietary information may be or will be exchanged which have unique characteristics. Questions about the necessity for an NDA should be directed to Legal.

Additionally, you must enter into a data protection agreement that complies with data protection laws before sharing any personal information with a third party. If you transfer personal information between countries, you may also need to enter into a compliant data transfer agreement. Questions about the necessity of data protection and data transfer agreements should be directed to Legal.



## External Communications

It is Badger Meter policy to communicate openly and actively with the media and investment community.

### Investors

Shareholders, financial analysts, lenders and others count on us to provide timely and reliable information on our company's operations, strategy, performance and outlook. Only designated personnel are authorized to speak to investors and analysts. Any inquiries should be directed to the VP-Investor Relations or alternatively to the CFO or CEO.

**Content posted on social media, outside of authorized digital marketing activities, must be done under your own identity, not as a representative of Badger Meter. Use good discretion and do not share proprietary information.**

## Media

News media contact should only be made through a company-authorized spokesperson. No employee should talk about company matters with a reporter or on social media, either on or off the record. The only way to ensure consistency of information is to have the source of information consistent.

Media is defined as any organization or person who distributes information directly to the public or through private subscriptions—such as TV, radio, websites, newspaper, trade magazines, association newsletters, and even student papers.

If you are approached by news reporters, you should refer them to the VP-Investor Relations, the CFO or CEO.

## Summary

Most of the time, the right conduct is obvious, but some situations can seem ambiguous. This Code of Conduct helps us understand how to operate our business ethically and with integrity, so we can focus on providing a great work environment for employees, providing outstanding products and solutions to customers and achieving our vision of protecting the world's most precious resource.

# Appendix – Resources / Contacts

## Legal

### Bill Bergum

VP-General Counsel and Secretary  
[bbergum@badgermeter.com](mailto:bbergum@badgermeter.com)

### David Miller

Director-Legal Counsel  
[dmiller@badgermeter.com](mailto:dmiller@badgermeter.com)

### Kavin Tedamrongwanish

Director-Legal Counsel  
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### Nick Gemmell

Director-Senior Legal Counsel (International)  
[ngemmell@badgermeter.com](mailto:ngemmell@badgermeter.com)

## Human Resources

### Sheryl Hopkins

VP-Human Resources  
[shopkins@badgermeter.com](mailto:shopkins@badgermeter.com)

### Jade Cryne-Atkinson

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[jcryne@badgermeter.com](mailto:jcryne@badgermeter.com)

### Caroline Nuwordu

HR Vienna  
[cnuwordu@badgermeter.com](mailto:cnuwordu@badgermeter.com)

### Sabrina Stiefel

HR Neuffen  
[sstiefel@badgermeter.com](mailto:sstiefel@badgermeter.com)

### Edgardo Zubiate

HR Mexico  
[ezubiate@badgermeter.com](mailto:ezubiate@badgermeter.com)

## Compliance Officers

### Bill Bergum

VP-General Counsel and Secretary  
[bbergum@badgermeter.com](mailto:bbergum@badgermeter.com)

### Dan Weltzien

VP-Controller  
[dweltzien@badgermeter.com](mailto:dweltzien@badgermeter.com)

## Trade Compliance

### Maraya Robinson

Trade & Regulatory Compliance Manager  
[mrobinson@badgermeter.com](mailto:mrobinson@badgermeter.com)

## Ethics Hotline

### 24 Hours/Day; 7 Days a Week – Multiple Languages Available

[www.badgermeter.ethicspoint.com](http://www.badgermeter.ethicspoint.com) | US toll-free: 844-229-8746

### Ethics Hotline Country-Specific Information

#### Telefonisch Direktwahl

- |  |                |
|--|----------------|
| 1. Wählen Sie von einem externen Telefon die Direktwahl für Ihren Ort: |                |
| Österreich   | 0-800-200-288  |
| 2. Wählen Sie nach dem englischen Hinweis                              | (844) 229-8746 |

#### Telefonicky Mezinárodní bezplatné volání (ITFS)

Při volání z vnější linky zvolte číslo ITFS místa, kde se nacházíte:

Česká republika	800 143 480
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#### Telefonisch Direktwahl

- |  |                |
|--|----------------|
| 1. Wählen Sie von einem externen Telefon die Direktwahl für Ihren Ort: |                |
| Deutschland  | 0-800-225-5288 |
| 2. Wählen Sie nach dem englischen Hinweis                              | (844) 229-8746 |

#### Por teléfono Acceso Directo

- |   |                  |
|---|------------------|
| 1. Desde una línea exterior, marcar el número de acceso directo correspondiente a su ubicación: México ( <i>Telmex</i> - 800) | 001-800-658-5454 |
| 2. México   | 01-800-288-2872  |
| 3. México ( <i>Telmex</i> - 800)  | 001-800-462-4240 |
| 4. México ( <i>Por Cobrar Spanish</i> )   | 01-800-112-2020  |
| Quando se le solicite en inglés marque  | (844) 229-8746   |

#### From an outside line dial the direct access number for your location:

Singapore ( <i>StarHub</i> )	800-001-0001
Singapore ( <i>SingTel</i> )	800-011-1111
At the English prompt dial	(844) 229-8746

#### From an outside line dial the direct access number for your location:

Sweden	020-799-111
At the English prompt dial	(844) 229-8746

#### Telefonisch Direktwahl

Wählen Sie von einem externen Telefon die Direktwahl für Ihren Ort:

Schweiz	0-800-890011
Wählen Sie nach dem englischen Hinweis	(844) 229-8746

#### 1. From an outside line dial the direct access number for your location

- |   |                |
|---|----------------|
| UAE   | 8000-021       |
| 2. UAE ( <i>du</i> )                        | 8000-555-66    |
| 3. UAE ( <i>Military-USO and cellular</i> ) | 8000-061       |
| At the English prompt dial                  | (844) 229-8746 |

#### From an outside line dial the direct access number for your location:

United Kingdom (British Telecom)	0-800-89-0011
At the English prompt dial	(844) 974-5063.

#### From an outside line dial the direct access number for your location:

China (Southern)	10-811
China (Northern)	108-888
At the English prompt dial	(844) 974-5063.



[badgermeter.com](https://www.badgermeter.com)

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