

FORTIVE – GLOBAL TAX STRATEGY

This Tax Strategy document relates to the year ending 31st December 2018. The document is intended to satisfy any statutory requirements to publish a tax strategy on its website in the territories in which Fortive operates¹.

About Fortive

Fortive is a diversified industrial growth company comprised of Professional Instrumentation and Industrial Technologies businesses that are recognized leaders in attractive markets. Fortive's well-known brands hold leading positions in field instrumentation, transportation, sensing, product realization, automation and specialty, and franchise distribution. Fortive is headquartered in Everett, Washington and employs a team of more than 24,000 research and development, manufacturing, sales, distribution, service and administrative employees in more than 40 countries around the world. With a culture rooted in continuous improvement, the core of our company's operating model is the Fortive Business System. For more information please visit: www.fortive.com.

Tax planning and attitude towards risk

Commercial business decision making will always be the primary value driver for Fortive. As part of that overall business strategy we will consider tax outcomes and structure transactions efficiently but always within the laws and practices in the territories in which we operate. Professional advice is sought on a transactional basis, with the depth of such advice being driven by our assessment of the risk presented by each opportunity.

Where tax law is uncertain, Fortive will only enter into tax planning strategies that carry a minimum "more-likely-than-not" assessment by management and our statutory auditor of successfully prevailing. For larger transactions, Fortive strongly prefers a "should" level success opinion from both our statutory auditor and a major law firm. As a result, Fortive generally will not take a material tax position that does not satisfy the more-likely-than-not threshold, even if tax authority exists to potentially take a "tax return filing position".

In addition, Fortive will not enter into any "Listed Transactions" specified by the US Tax Authorities as having questionable tax status.

Fortive only enters into transactions which have the economic substance and business purpose required under both US and OECD guidance.

Processes and Controls

Fortive sees tax compliance as a key to maintaining good relationships with Tax Authorities and has instituted strong internal processes and controls in the tax area. In the spirit of continuous improvement, Fortive continues to enhance these processes and controls through innovation and automation.

¹ Including, inter alia, the UK's Large Business Tax Strategy requirements set out in FA 2016, Sch 19, Part 2, and specifically relating to the following UK companies and their UK subsidiaries for the period in question: TGA UK Holdings Limited, TGA UK Alpha Limited, Landauer Europe Limited, Industrial Scientific Holdings UK Limited, Advanced Sterilisation Products (UK) Limited, Accruent UK Holdings Limited and VFA Limited.

Relationships with Tax Authorities

Fortive seeks strong relationships with Tax Authorities based on open communication and transparency.

This Tax Strategy document has been signed on behalf of Fortive Corporation by:

A handwritten signature in black ink that reads "John Mitchell". The signature is written in a cursive style with a large initial "J" and "M".

John Mitchell

Vice President – Tax

10th December 2018