

Important U.S. Federal Income Tax Information for Shareholders Concerning the Distribution of Shares of Vontier Corporation Common Stock

Dear Shareholder,

On October 9, 2020, Fortive Corporation (“Fortive”) distributed to holders of Fortive common stock two shares of Vontier Corporation (“Vontier”) common stock for every five shares of Fortive common stock held by such holders at the close of business on September 25, 2020 (except that any fractional shares of Vontier common stock that Fortive shareholders otherwise would have been entitled to receive in the distribution were aggregated and sold in the public market and the aggregate net cash proceeds of these sales were distributed to those shareholders who would otherwise have been entitled to receive such fractional shares) (the “Distribution”).

This letter describes how to allocate your tax basis between your Fortive common stock and the Vontier common stock you received in the Distribution for U.S. federal income tax purposes. A copy of Internal Revenue Service (“IRS”) Form 8937, Report of Organizational Actions Affecting Basis of Securities, is attached to this letter. The Form 8937 is required to be filed by issuers of stock that engage in organizational actions that affect the basis of that stock, in order to report certain information to shareholders and the IRS.

The following discussion is not tax advice and is directed only at U.S. holders who held their Fortive common stock as a capital asset (generally, property held for investment purposes). This discussion assumes that the U.S. federal income tax consequences of the Distribution are as described under the heading “*U.S. Federal Income Tax Consequences of the Distribution*” in the Registration Statement on Form 10 initially filed by Vontier with the Securities and Exchange Commission on September 1, 2020, as amended or supplemented through the date hereof.

THIS INFORMATION IS SOLELY FOR ILLUSTRATIVE PURPOSES AND IS NOT TAX ADVICE. YOU SHOULD CONSULT YOUR TAX ADVISOR AS TO THE TAX CONSEQUENCES OF THE DISTRIBUTION UNDER U.S. FEDERAL, STATE, LOCAL AND NON-U.S. TAX LAWS.

Tax Basis and Determination of Fair Market Values

The aggregate tax basis of your shares of Fortive common stock held prior to the Distribution must be allocated between (i) the Fortive common stock you continued to hold immediately following the Distribution and (ii) the Vontier common stock you received in the Distribution (including any fractional shares of Vontier common stock you were treated as having received), in proportion to their relative fair market values.

U.S. federal income tax laws do not specifically identify how to determine the fair market values of the Fortive common stock or the Vontier common stock. You should consult your tax

advisor to determine the appropriate fair market values. One approach is to use the average of the high and low trading prices quoted on the New York Stock Exchange on October 9, 2020, the first trading day after the Distribution, as illustrated in the following example.

This example assumes you choose to use the average of the high and low trading prices on October 9, 2020, as the method of determining the fair market values of the Fortive common stock and the Vontier common stock. Using this method, after the Distribution, the fair market value of a share of Fortive common stock was \$70.42 and the fair market value of a share of Vontier common stock was \$30.38. Based on the two (2) to five (5) distribution ratio, this means that you would have received \$12.15 of Vontier common stock for each share of Fortive common stock you own. Based on these relative fair market values, your pre-Distribution basis in your Fortive common stock would be apportioned 85.2831% to your post-Distribution Fortive common stock and 14.7169% to your Vontier common stock (please see Exhibit 1 for an explanation of how these percentages were calculated). This calculation may be illustrated as follows (note that in this example, certain results may not reconcile due to rounding):

- Assume you own a single block of 126 shares of Fortive common stock with a tax basis of \$20 per share (and a total tax basis of \$2,520).
- You are entitled to receive 50.4 shares of Vontier common stock in the Distribution. Because no fractional shares are issued, you receive 50 shares of Vontier common stock and cash in lieu of 0.4 fractional shares.
- Your total tax basis in your pre-Distribution Fortive common stock is allocated \$2,149.14 to the Fortive common stock (85.2831% of \$2,520), or \$17.06 per share (i.e., \$2,149.14 divided by 126 shares), and \$370.86 to the Vontier common stock (14.7169% of \$2,520), or \$7.36 per share (i.e., \$370.86 divided by 50.4 shares).
- The portion of the tax basis allocated to your Vontier common stock that relates to the 0.4 fractional share of Fortive common stock for which you received cash is \$2.94 (0.4 fractional share multiplied by \$7.36 of tax basis per share of Vontier common stock). This would leave you with \$367.92 of tax basis in your remaining shares of Vontier common stock (i.e., \$370.86 minus \$2.94).

The above calculations are summarized in the following table:

Shares	Number of Shares	Tax Basis Allocation (per share)	Tax Basis Allocation (total)
Fortive	126	\$17.06	\$2,149.14
Vontier	50	\$7.36	\$367.92
Vontier (fractional Shares)	0.4	\$7.36	\$2.94
Total Tax Basis			\$2,520.00

Illustrative Calculation of Basis Allocation Percentages

Common Stock	Value/Percentage
Fortive Value (a)	\$70.42
Value of Vontier stock received for each Fortive share owned (b)	\$12.15
(a) + (b) = (c)	\$82.57
Fortive Allocation % (a)/(c)	85.2831%
Vontier Allocation % (b)/(c)	14.7169%

Part II Organizational Action *(continued)*

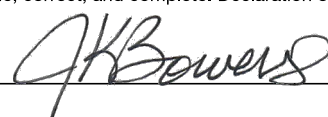
17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ [See attachment.](#)

18 Can any resulting loss be recognized? ▶ [See attachment.](#)

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ [See attachment.](#)

Sign Here

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Signature ▶  Date ▶ 13 October 2020

Print your name ▶ Jennifer Bowers Title ▶ Vice President, Tax

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶				Firm's EIN ▶
	Firm's address ▶				Phone no.

Fortive Corporation

Distribution of Vontier Corporation Common Stock Attachment to Form 8937

Part II

Line 14 – Describe the organizational action and, if applicable, the date of the action or the date against which shareholders’ ownership is measured for the action.

On October 9, 2020, Fortive Corporation (“Fortive”) distributed to holders of Fortive common stock, on a pro rata basis, 80.1 percent of the outstanding shares of Vontier Corporation (“Vontier”) common stock (except that any fractional shares of Vontier common stock that Fortive shareholders otherwise would have been entitled to receive in the distribution were aggregated and sold in the public market and the aggregate net cash proceeds of these sales were distributed to those shareholders who would otherwise have been entitled to receive such fractional shares) (the “Distribution”). Each Fortive shareholder received two shares of Vontier common stock for every five shares of Fortive common stock held on September 25, 2020, the record date for the Distribution.

The information contained herein does not constitute tax advice and is not intended or written to be used for the purpose of avoiding penalties under the Internal Revenue Code. In addition, this information does not purport to be complete or to describe the consequences that may apply to particular categories of Fortive shareholders.

Shareholders are urged to consult their own tax advisor regarding the particular consequences of the Distribution, including the applicability and effect of all U.S. federal, state and local, and foreign tax laws.

Line 15 – Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis.

The aggregate tax basis of your shares of Fortive common stock held prior to the Distribution must be allocated between (i) the Fortive common stock you continued to hold immediately following the Distribution and (ii) the Vontier common stock you received in the Distribution (including any fractional shares of Vontier common stock you were treated as having received), in proportion to their relative fair market values.

Item 16 — Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of the securities and the valuation dates.

U.S. federal income tax laws do not specifically identify how to determine the fair market values of the Fortive common stock or the Vontier common stock. One method for determining the fair market values is to use the average of the high and low trading prices of the Fortive common stock and the Vontier common stock on October 9, 2020, the first trading day after the Distribution.

Using this method, the fair market value of a share of Fortive common stock on October 9, 2020 was \$70.42 and the fair market value of a share of Vontier common stock on October 9, 2020 was \$30.38. Based on these fair market values and the distribution ratio of two shares of Vontier common stock per five shares of Fortive common stock held, shareholders' pre-Distribution tax basis should be apportioned 85.2831% to their Fortive common stock and 14.7169% to their Vontier common stock.

Item 17 — List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based.

The applicable Internal Revenue Code sections upon which the tax treatment is based are sections 355, 358 and 368.

Item 18 — Can any resulting loss be recognized?

Fortive intends for the Distribution to qualify as a "reorganization" under sections 355 and 368(a)(1)(D) of the Internal Revenue Code. Assuming that this characterization is respected, Fortive shareholders generally will not recognize any loss on the Distribution for U.S. federal income tax purposes (except to the extent that a loss may be recognized with respect to any cash received in lieu of fractional shares of Fortive common stock).

Item 19 — Provide any other information necessary to implement the adjustment, such as the reportable tax year.

The Distribution occurred on October 9, 2020. As a result, the basis adjustments in the shares of Fortive common stock and Vontier common stock should be reported in the taxable year that includes this date. In the case of shareholders who are calendar year taxpayers, the Distribution is reportable in the tax year ending December 31, 2020.