



Code of
Conduct

Message from our President

Edwards is now the Vacuum Solutions Division of the Atlas Copco Group. We are a Division within a highly reputable global company. This Edwards' Code of Conduct booklet demonstrates our Division's commitment within the organisation, and externally, to the value and importance we place on honest, ethical and lawful conduct in all our business dealings.

It is important for all of us to uphold Group values which encourage us to behave ethically, with integrity and with mutual respect. In practice, what this means for each of us is that we must always be striving to know and do the right thing at all times.

This Code of Conduct applies to our Division, and the stakeholders we engage, including each supplier, consultant, agent and distributor, who also is responsible for understanding this important code. We are always available to help ensure this happens.

This booklet sets out the principles which will help us to fulfil this goal together and is underpinned by extensive reading and training material on the intranet. I urge each of you to continually refresh your understanding of the code, and to actively support its ongoing implementation.



Geert Follens - President, Edwards Limited
part of the Atlas Copco Vacuum Solutions Division



Introduction

This booklet provides an introduction to the Edwards Code of Conduct which you should read and understand. All staff can view on the Edwards intranet the Code of Conduct and related policies in full and complete the relevant on-line training. In addition, face-to-face training will be provided on an as-required basis.

Why Code of Conduct?

Our business brings with it obligations to comply with the law, adhere to our Group standards, policies, and principles, exercise good stewardship of our assets and the environment, and behave safely and ethically at all times.

In order to meet these obligations, our Code of Conduct sets out the principles and standards that guide the way we do business. It provides a summary of the complex ethical and legal guidelines to help each of us to understand better the basic rules that apply - and the personal responsibility for compliance which we each bear.

Only by consistently acting with integrity do we earn the trust of our stakeholders, customers, colleagues, suppliers and the communities where we live and work - those whose trust we must maintain if Edwards is to be successful.

Our standards are not simply words on a piece of paper but ways of ensuring we consistently know and do the right thing, always.

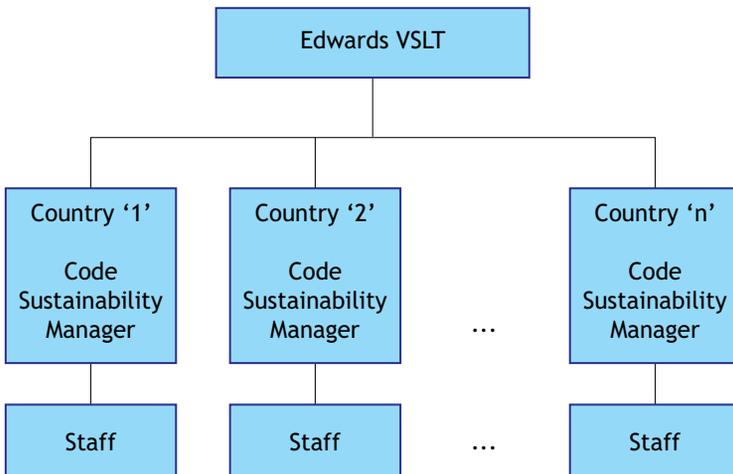
In addition to the Code of Conduct, Edwards supports the principles of the Atlas Copco Group and those of the Electronics Industry Code of Conduct, which sets guidelines for sustainable health, safety and environmental management systems, and labour and ethics practices, for electronics companies and their suppliers.



Who is responsible for the Code of Conduct?

The Code of Conduct is the responsibility of us all, both collectively and as individuals, specifically:

- the Division President having overall ownership, and the Vacuum Solutions Leadership Team (VSLT) being responsible for ensuring the Code is cascaded, communicated and understood. They have tasked sponsorship and management of the Code to the Legal Department and Code Sustainability Managers, who meet quarterly.
- the Legal Department reports quarterly to the VSLT and the Vice President and General Counsel for Group Compliance on code matters.
- each manager and supervisor must ensure that they support the Code, train their teams and enforce compliance.
- investigations and resulting actions are managed under the direction of the Legal Department, by utilising line management, Human Resources, or other appropriate personnel, and using standard company procedures with appropriate confidentiality.
- you are encouraged to report at any time any concerns through the 'Speak Out' service or through any available channels, as discussed in this Code.



Code of Conduct overview

Key principles

Whilst working for or representing our Group or Division, each of us will behave with integrity and honesty at all times in accordance with our Code of Conduct. Failure to do so may lead to disciplinary action up to and including dismissal and may also result in criminal charges and legal action to cover losses or damages.

Retaliation for raising a good faith concern will not be tolerated. Anyone responsible for reprisals against individuals who report suspected misconduct or other risks to the business will be subject to disciplinary action up to and including dismissal and/or legal action.

Supporting values

- Teamwork and trust, respect for individuals and their aspirations and appreciation of differences
- Our commitment to safety and respect for the environment
- Employees who are empowered to act
- High ethical standards where professional excellence is pursued and teams and individuals who contribute to our success are rewarded
- Our commitment to good labour practices, and respect for the human rights of employees
- An open environment, where issues can be raised in good faith, be investigated and acted upon, and where whistle-blowing is encouraged within a non-retaliatory environment.

Commitment to our organisation

As members of the Atlas Copco Group, we are committed to fostering a workplace that is safe and that is founded on fair employment practices and mutual respect. We strive for a work environment in which we:

- value the safety, health and security of our co-workers
 - avoid conflicts of interest that may interfere with our obligations to Edwards or the Group
 - value and embrace diversity and equal opportunity
 - promote good labour practices, including – freely chosen employment; child labour avoidance; working hours; wages and benefits; humane treatment; non-discrimination; freedom of association.
 - prohibit all forms of harassment and retaliation
 - prohibit the abuse of drugs and alcohol
 - ensure confidentiality of our employees' personal information
 - encourage caution, moderation and good judgment in the giving and receiving of gifts, favours and entertainment
 - absolutely prohibit the giving or receiving of bribes including facilitation payments
 - reject corrupt practices
-

Commitment to our external environment

In all our business dealings, we strive to be honest and fair. We strive to act in line with all applicable laws, rules and regulations in the jurisdictions where we conduct business. We are also committed to being a positive contributor to the communities in which we do business. In particular, we will always:

- compete vigorously but fairly and legally, adhering to competition and antitrust laws
- avoid discussing competitive issues in trade associations or in any other potentially compromising environment
- comply with all applicable anti-bribery and corruption laws
- respect the intellectual property and copyrights of others
- promote our products and services accurately and honestly
- comply with international trade controls
- strive to ensure our suppliers, distributors, and agents operate in line with our Code and Group practices
- meet government, industry and Group safety and quality standards
- absolutely prohibit the giving or receiving of bribes including facilitation payments
- reject corrupt practices
- respect the principles of human rights
- act with sound environmental management



Commitment to anti-bribery and ethical procurement

Edwards, part of The Atlas Copco Group has adopted strict policies and procedures forbidding any and all bribes, corruption or fraud (the 'ABC' Policy). In addition, Edwards also has an Ethical Purchasing Policy to its dealings with suppliers. Edwards will take action to deal with any material breach of these policies or procedures by its customers, associates or suppliers. This will include terminating the business relationship if concerns cannot be appropriately addressed.

Edwards has a zero tolerance of bribery and corruption. In particular:

- it will not pay bribes, or tolerate such behaviour either by its suppliers or by those who perform services for or on its behalf, including so-called 'facilitation payments', which are forbidden.
- it will not accept bribes, or tolerate such behaviour either by its suppliers or by those who perform services for or on its behalf.

Commitment to our stakeholders

We remain committed to promoting the interests of our Group's stakeholders by working hard to achieve superior financial results, protect company assets and resources, avoid conflicts of interest, and accurately measure and report our financial performance in accordance with Group policies and relevant laws and regulations.

Framework and training

Edwards' staff are required to complete certain training material, which is located on the Edwards intranet. The material is reviewed and updated on a regular basis and is supported by face-to-face training across the organisation.

The Code of Conduct, the individual policies it brings together and the related training material are all categorised into a number of Code Control Elements ("CCE"), with each element being comprised of a number of Code Topics, for example:

- CCE 01 - Overview
 - CCE 02 - People behaviour
 - CCE 03 - Company behaviour
 - CCE 04 - Company property
 - CCE 05 - Suppliers
 - CCE 06 - Markets
 - CCE 07 - External groups
-

Reporting

How do I raise a concern? ‘Speak Out!’

It is important to remember that failure to report an issue may result in criminal or financial penalties or damage to our reputation.

Should you be concerned that a breach of the Code has occurred, or is likely to occur, you should raise the matter with your immediate supervisor or manager.

Should you not wish to do so, you may raise a concern about any wrongdoing through the ‘Speak Out’ confidential freephone hotline run by an independent third party service provider, Safecall. The ‘Speak Out’ service has been set up to give anyone who calls complete confidence to raise matters of concern or wrongdoing under our Code of Conduct. The confidential freephone numbers for each country in which we operate can be found [here](#) or on the ‘Speak Out’ posters which have been placed at all our establishments. Alternatively, you can raise an issue confidentially by email to “hotline@se.atlascopco.com” or “codeofconduct@edwardsvacuum.com”.

However, anonymous reporting does not serve to satisfy a duty to disclose your own involvement in a real or perceived conflict of interest or in a real or perceived unethical or illegal conduct.

If you are a third party and have concerns, please inform our Division President or any member of the VSLT. Alternatively, you can raise an issue confidentially by email to “hotline@se.atlascopco.com” or “codeofconduct@edwardsvacuum.com”.

What happens if the Code of Conduct is breached?

All Edwards staff must abide by the Code of Conduct and related policies. Failure to abide by the Code of Conduct may lead to disciplinary action up to and including dismissal, referral for criminal prosecution and legal action to recover resulting losses or damages.

We also expect that our suppliers, consultants, temporary staff, agents, distributors and customers will follow the principles laid down in this policy. Failure to operate in accordance with these principles may, depending on the seriousness of the breach, lead to termination of the business or contractual relationship, referral for criminal prosecution and legal action to recover resulting losses or damages.

External considerations

Edwards, part of the Atlas Copco Group, its Group customers and suppliers are active in many countries around the world. Consequently, unless this Code is contrary to local laws, rules and regulations, the principles laid down in this Code and those in the Atlas Copco Business Code of Practice will apply.

Edwards is a member of the Electronics Industry Citizenship Coalition (EICC) and, through this Code, adopts the EICC Code of Conduct for both its own operations and its supply chain. Please refer to the full EICC Code of Conduct at <http://www.eicc.info/>

Regional variations

Each region, at its discretion, may produce additional guidelines such as local policies relating to gifts. It is the responsibility of local management to ensure that these guidelines complement and do not contradict core guidelines. All such additions must be submitted to the Legal Department for approval prior to publishing on the intranet.

This booklet is available in other languages from the Code of Conduct section of the Edwards Intranet site at:

<http://edweb/codeofconduct>

Questions and contact information

In order to always do the right thing, we all have the responsibility to know what the right thing to do is. Common sense, good judgement and your conscience are often your best guides when faced with a difficult situation. This overview should also help in your understanding.

Further information relating to the Code of Conduct can be found via:

- the Code of Conduct section on the Edwards intranet
<http://edweb/codeofconduct>
- intranet based on-line training
- local HR and Legal Department

You are encouraged to use the 'Speak Out' service mentioned earlier in this booklet. Alternatively, you can raise an issue confidentially by email to "hotline@se.atlascopco.com" or "codeofconduct@edwardsvacuum.com".





ADDITIONAL COPIES OF THIS DOCUMENT MAY BE
OBTAINED FROM YOUR LOCAL HR DEPARTMENT OR
LEGAL CONTACT OR MAY BE DOWNLOADED FROM
THE CODE OF CONDUCT SECTION OF THE EDWARDS
INTRANET SITE AT

<http://edweb/codeofconduct>

My local Code Sustainability Manager is...

My local HR / Legal Services representative is...
