

## NORDSON CORPORATION CODE OF ETHICS FOR SUPPLIERS AND THIRD-PARTY PROVIDERS

Nordson Corporation values its reputation for conducting business honestly and with integrity. For more than sixty years, we have prided ourselves on doing business the Nordson way – striving to be a vital, self-renewing, worldwide organization which, within the framework of ethical behavior and enlightened citizenship, grows and produces wealth for our customers, employees, shareholders and communities.

Nordson views its suppliers and third-party providers as critical to its success. We, therefore, engage suppliers and third-party providers who maintain a commitment to strong ethical standards. This Code of Ethics provides a foundation for Nordson and its suppliers and third-party providers to build and maintain relationships based on fairness, trust, respect for the rights of individuals, compliance with the law and sustainable business practices. Nordson strongly encourages its suppliers to go beyond this Code of Ethics and promote best practices and continuous improvement throughout their operations.

*Note: Nordson relies on many outside resources, including contractors, subcontractors, suppliers, distributors, third party resellers, independent sales representatives, vendors, consultants and others. For simplicity, all third-party providers of goods and services to Nordson are referred to as “suppliers” in this Code of Ethics for Suppliers and Third-Party Providers.*

### LEGAL COMPLIANCE

Above all else, we are committed to obey the law wherever we conduct business. We expect our suppliers to do the same. To that end, we insist that our suppliers:

- Comply with all applicable United States, international and local laws and regulations, including domestic, foreign and local, in the conduct of its activities relating to or in connection with its relationship with Nordson.
- Avoid actual or apparent conflicts of interest, and abide by our gift and entertainment guidelines. (See Appendix 1 – Gifts and Entertainment by Suppliers and Third-Party Providers)
- Do business in an ethical and transparent manner, not offering or accepting bribes, kickbacks or improper payments of any kind to/from government officials or other third parties for the purpose of obtaining or retaining business or gaining an improper advantage. Suppliers are required to comply with the U.S. Foreign Corrupt Practices Act, UK Bribery Act and other applicable anti-bribery laws in each jurisdiction in which they do business. (See Appendix 1 – Gifts and Entertainment by Suppliers and Third-Party Providers)
- Use fair employment practices and provide a safe and productive work environment for its employees. Wages and other related benefits must meet

at least the legal and industry minimum standard in the country in which they do business. Applicable laws and industry standard on working hours in each country must be applied. Safe and healthy workplaces must be offered for all employees. If residential accommodations are offered to supplier employees, the accommodations must comply with applicable laws for health and safety. Suppliers will comply with minimum age requirements prescribed by applicable laws.

- Must not use or support the use of forced or compulsory labor, nor shall any employee be required to lodge “deposits” or identity papers when commencing employment. (See Appendix 2 – Policy Against Human Trafficking and Slavery)
- Manage their business in an ethical and responsible way with respect to human rights. (See Appendix 3 – Human Rights Policy)
- Manage their business in a sustainable and responsible way. At a minimum, our suppliers are expected to meet all applicable environmental rules, regulations and laws in the countries where they do business.
- Comply with applicable laws and standards relating to hazardous or restricted substances, and cooperate and comply with Nordson’s reasonable requests, requirements and instructions relating to hazardous or restricted substances, including Nordson’s Restricted Substances Program<sup>1</sup>.
- Maintain the confidentiality of our proprietary information and trade secrets. As part of this commitment, we expect our suppliers to only use the Nordson brand names and trademarks where in writing permitted to do.
- Take any and all actions necessary to comply with applicable United States import/export laws and regulations and other foreign laws applicable to the import, export, re-export and transfer (in-country) (collectively, “Trade Laws”) of products (including software, technology and services), including making determinations and maintaining records of the final end-user and end-use of products when a supplier is involved in the export, re-export or transfer (in-country) of products to a third party. Supplier will promptly notify Nordson in writing if supplier has reason to believe that any products are, or are intended to be, used in a manner that would violate any Trade Law.
- If a supplier is providing products to Nordson, the supplier will provide Nordson with accurate export control classification numbers (ECCN), export control numbers (ECN) or similar export control indicators, and will provide supporting documentation of such classifications upon request.
- Abide by the Nordson Corporation Conflict Minerals Policy. (See Appendix 4)

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<sup>1</sup> See <https://www.nordson.com/en/our-company/resources/restricted-substances-program>.

Nordson will use various methods to assess supplier performance in these areas. The adherence to this Code of Ethics must primarily be based on trust, but Nordson will, from time to time, perform audits, supplier self-assessments and regular requests for submittal of information or data related to supplier performance. If a supplier deviates from the requirements of this Code of Ethics, appropriate corrective and preventative actions must be taken. Suppliers who persistently refuse to implement appropriate corrective and preventive actions or who have critical deviations against this Code of Ethics will be excluded from current and future business with Nordson until such deficiencies have been remediated.

## **OUR COMMITMENT TO OUR SUPPLIERS**

In our relationships with our suppliers, we

- Will not make payments to any employees of suppliers to attain lower prices or gain any improper advantage for Nordson.
- Will not disclose a supplier's pricing, technology or other confidential information without proper authorization from a supplier to do so.
- Will not make false or misleading remarks to others about suppliers or their products or services.

If you have a question or if any clarification is needed about a situation or relationship that is discussed in this Code of Ethics, you may contact a Nordson manager or, if that is not feasible, contact any resource on the following Contact List.

### **NORDSON CORPORATION CONTACT LIST**

- Nordson Corporation Ethics and Compliance
  - [ethics.compliance@nordson.com](mailto:ethics.compliance@nordson.com)
- Nordson Supply Chain Management
  - Robert McCory  
(440) 985-4000
- Nordson Ethics and Compliance Officer
  - Gina A. Beredo  
(440) 892-1580
- External Helpline: Navex Global
  - United States: 1-888-391-3196
  - Other Countries: [www.nordson.ethicspoint.com](http://www.nordson.ethicspoint.com)

## Acknowledgment Form

By signing below, the undersigned acknowledges that it has received a copy of the Nordson Corporation Code of Ethics for Suppliers and Third-Party Providers ("Code of Ethics"). As a supplier or third-party provider for Nordson Corporation, the undersigned and its employees, representatives, suppliers and third-party providers are responsible for knowing and adhering to the principles and standards of this Code of Ethics.

The undersigned further acknowledges and agrees that this Code of Ethics is intended to provide a general overview of Nordson Corporation's policies, and does not necessarily represent all such policies and practices in effect at any particular time. The undersigned and its employees, representatives, suppliers and third-party providers will comply with all current and/or future versions of this Code of Ethics, written policies, practices, rules, regulations or directives issued by Nordson Corporation.

The undersigned will contact a Nordson manager or any of the resources on the Contact List if there are any questions concerning this Code of Ethics or any behavior or situation concerning Nordson Corporation. The undersigned also understands that it has a responsibility to report any violations of this Code of Ethics to any of the resources on the Contact List immediately.

Suppliers who persistently refuse to implement appropriate corrective and preventive actions or who have critical deviations against this Code of Ethics will be excluded from current and future business with Nordson until such deficiencies have been remediated.

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[Date]

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[Supplier/Third Party Provider] (Please Print)

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[Signature]

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[Print Name]

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[Title]

## **Gifts and Entertainment by Suppliers and Third-Party Providers**

### **Introduction**

Appropriate gifts and entertainment can help strengthen business relationships, but these business courtesies must never improperly influence business decisions, and they must always be given and received in accordance with our policies and the law. The term “gift” is defined broadly to include gifts and other things of value.

Nordson, all of its subsidiaries, all associates, officers, directors and agents of Nordson when representing Nordson and/or its subsidiaries are collectively referred to herein as “Nordson” or “Nordson Associates”.

“Immediate Family Member” means a spouse or domestic partner, any minor children, any older children living in the same household or who rely primarily on the individual for financial support, and any relatives (by blood, marriage or otherwise) living in the same household.

“Government Officials” means (a) any officer or employee of a government or any department, agency, jurisdiction or instrumentality of a government whether U.S. or foreign, (b) any person acting in an official capacity for or on behalf of that government or department, agency, or jurisdiction whether U.S. or foreign, or (c) any official, employee or person acting on behalf of a public international organization (e.g. the World Bank, the European Union, etc.) or political party. Note that this definition can be applied broadly, particularly in countries where industries are owned or controlled by the government. In these cases, employees within these industries can be construed as Government Officials.

### **Gifts to Nordson**

Neither Nordson Associates nor their Immediate Family Members may ask for or accept a gift or anything of value from anyone doing or seeking to do business with Nordson, if the gift is for the purpose of influencing or rewarding the Nordson Associate in connection with any business decision or transaction involving Nordson, or, to a reasonable person, the gift would present the appearance of an attempt to influence or reward the Nordson Associate in connection with any business decision or transaction involving Nordson.

Importantly, it is not necessary for the gift to be explicitly in exchange for some action by the Nordson Associate to be improper. A Nordson Associate may not accept a gift that to a reasonable person appears to be an attempt to reward the Nordson Associate for any action they took as a Nordson Associate, even if the Nordson Associate would have taken the same action without regard to the gift.

A Nordson Associate may accept a gift from or give a gift to a person doing or seeking to do business with Nordson when the gift is based on a family or personal relationship that exists separately and apart from any Nordson business.

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1. The following apply to gifts received by Nordson Associates, as well as Immediate Family Members:
  - a. As long as the gift is in compliance with the general principles set forth herein, a Nordson Associate may accept gifts from one source, the aggregate value of which does not exceed \$250 in a calendar year.
  - b. Regardless of the amount, gifts of cash and cash equivalents are prohibited. Nordson Associates must not accept a gift of money, securities or cash equivalents, including gift certificates and gift cards from customer or suppliers.
  - c. If a Nordson Associate is offered a gift or something of value beyond the permissible amount, the Nordson Associate must notify the Law Department. A Nordson Associate must refuse or return any gift in excess of the permissible amount unless approval is obtained from the Office of the General Counsel.
  - d. If the value of a gift is not known, a Nordson Associate should make a reasonable effort to establish the approximate worth (e.g., reviewing and comparing the gift to similar items in a shopping catalog). If an approximate value is unable to be determined, the Nordson Associate should consult with their supervisor or the Law Department.
  - e. A Nordson Associate should attempt to notify the Law Department if any gift seems inappropriate or an attempt to influence, or if gifts are repeatedly given from the same source.
2. The following items are not subject to the above limit:
  - a. Gifts from anyone with whom Nordson Associates or Immediate Family Members have a family or personal relationship that are not given as a result of their employment.
  - b. Civic, educational or charitable organization awards.
  - c. Discounts or rebates offered to the public, to substantially all Nordson Associates or to substantially all Nordson Associates in a market or business unit.
  - d. Business entertainment where the customer or supplier is in attendance. Business entertainment where the customer or supplier is not in attendance is not considered an allowable gift.

### **Business Entertainment Paid by Supplier**

Entertainment that is reasonable, appropriate and compliant with applicable laws and the principles set forth herein is generally acceptable. This may include occasional meals and/or attending ordinary sporting, theatre or other cultural events or activities. The supplier must be present during the event. Certain

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venues are not appropriate for business entertainment because of the nature of the entertainment or the atmosphere. Nordson Associates are expected to exercise good judgment. If an invitation is inappropriate, the Nordson Associate must politely refuse the offer or pay the true value of the entertainment expense personally.

### **Third Party Gifts and Entertainment to/from Supplier**

When a Nordson supplier is providing or receiving gifts or entertainment to or from a third party, the supplier is expected to act ethically and in compliance with all applicable laws.

Nordson will never request that a supplier act in an unlawful or unethical manner on Nordson's behalf. If a supplier believes that any Nordson Associate has expressly or implicitly requested that the supplier act in an unethical or unlawful manner, the supplier should not honor the request, should seek clarification from the Nordson Associate and should report the situation to Nordson's Ethics and Compliance Officer and/or through Nordson's external helpline.

Suppliers must implement and adhere to policies consistent with this Policy, and ensure that their books, records and accounts accurately and fairly reflect gift and entertainment transactions in reasonable detail. Suppliers must maintain a system of internal accounting controls sufficient to assure that a supplier's management has control, authority and responsibility over the supplier's assets. Suppliers should not give or receive gifts or entertainment related to any Nordson business that would not be permitted for a Nordson Associate to receive under this Policy.

If, in connection with any Nordson business, a third party solicits a bribe or kickback from a supplier, or requests a gift or entertainment from a supplier that could give the appearance of impropriety, the supplier should not honor the request and should report the situation to Nordson's Ethics and Compliance Officer and/or through Nordson's external helpline.

### **Government Officials.**

Gifts and entertainment to Government Officials are subject to more restrictive laws and ethical obligations. Any gifts or entertainment by a supplier to a Government Official related to Nordson business should be approved in advance by a Nordson Associate and unquestionably reasonable in value, culturally appropriate and compliant with all applicable laws. Gifts of cash and cash equivalents are prohibited. All gifts and entertainment to Government Officials must be fairly and accurately recorded in reasonable detail in the supplier's books, records and accounts.

If, in connection with any Nordson business, a Government Official solicits a bribe or kickback from a supplier, or requests a gift or entertainment from a supplier that could give the appearance of impropriety, the supplier should not honor the

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request and should report the situation to Nordson's Ethics and Compliance Officer and/or through Nordson's external helpline.

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## **Policy Against Human Trafficking and Slavery for Suppliers**

### **I. Purpose**

Nordson is committed to a work environment that is free from human trafficking, forced labor and unlawful child labor (“human trafficking and slavery”). We strongly believe that we are responsible for promoting ethical and lawful employment practices. These practices are also required to be followed by our suppliers, subcontractors or business partners (collectively referred to as “Suppliers”) worldwide. This policy also complies with the United Kingdom Modern Slavery Act and the California Transparency in Supply Chains Act.

### **II. Scope**

This policy covers all employees of Nordson Corporation and all of its subsidiaries (collectively referred to as “Nordson”) and all of its Suppliers.

In the event anything in this policy may conflict with local law, local law will control the interpretation and application of this policy.

### **III. Definitions**

**Human Trafficking:** the recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

**Forced Labor:** all work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.

**Harmful Child Labor:** consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child’s education, or to be harmful to the child’s health, or physical, mental, spiritual, moral, or social development.

### **IV. Rationale**

Nordson will not tolerate the use of unlawful child labor or forced labor in the manufacture of products it sells and will not accept products or services from Suppliers that employ or utilize child labor or forced labor in any manner. Human trafficking and slavery are crimes under state, federal and international law. These crimes exist in countries throughout the world. This Policy is to define how Nordson will make efforts to eradicate human trafficking and slavery from not only within its organization but also from our supply chains.

## **V. Requirements**

Suppliers:

- A. Will not use forced or compulsory labor, i.e., any work or service that a worker performs involuntarily, under threat of penalty;
- B. Will ensure that the overall terms of employment are voluntary;
- C. Will comply with the minimum age requirements prescribed by applicable laws unless a specific contract contains stricter age requirements;
- D. Will compensate its workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay requirements;
- E. Will abide by applicable law concerning the maximum hours of daily labor.

## **VI. Certification**

Suppliers will certify that materials incorporated into the products they provide complies with the laws regarding human trafficking and slavery of the country or countries in which they are doing business.

## **VII. Audits**

Suppliers must be able to demonstrate compliance with this Policy at the request and satisfaction of Nordson. Nordson will perform periodic audits on this Policy.

## **VIII. Consequences**

Suppliers who engage in human trafficking and slavery will have their supply agreements terminated.

If a Supplier to Nordson is found in violation of this policy, Nordson will take prompt, remedial measures to address the violation.

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## **Enterprise-Wide Human Rights Policies and Values**

Human rights are fundamental rights and freedoms that all people are entitled to without regard to race, color, national origin, religion, gender, age, marital status, physical or mental disability, veteran status, citizenship status, gender identity and expression, or sexual orientation. It is the policy of Nordson Corporation and its subsidiaries (collectively, “Nordson”) to respect human rights in all of our activities and to support the principles set forth in the Universal Declaration of Human Rights, the International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work, the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights. We expect all Nordson personnel will work to reduce the risk of potential human rights violations by identifying risks, monitoring those risks and remediating any non-compliance.

Pursuant to the Code of Ethics for Suppliers and Third-Party Providers, Nordson’s third-party providers of goods and services (collectively, “Suppliers”) are expected to adhere to this policy and comply with laws and regulations related to human rights.

### **Human Trafficking and Child Labor**

- Nordson’s [Policy Against Human Trafficking and Slavery](#) complies with the United Kingdom Modern Slavery Act and the California Transparency in Supply Chains Act.

### **Workplace Diversity and Equal Opportunity**

- Nordson is dedicated to cultivating a positive work environment where employees are treated fairly. Nordson does not condone, nor will it tolerate, prohibited discrimination based on characteristics protected by law, such as: race, color, national origin, religion, gender, age, marital status, physical or mental disability, veteran status, citizenship status, gender identity and expression, or sexual orientation.
- Nordson personnel should be particularly cognizant of, and make provisions to protect, populations who may be more vulnerable to human rights abuses, including children, women, minorities, migrants and indigenous populations.

### **Freedom of Association**

- Nordson recognizes and respects its employees’ right to associate freely and bargain collectively. Nordson will work constructively with recognized employee representatives to promote the interests of its employees. In locations where employees are not represented by unions, Nordson provides opportunities for employee concerns to be heard.

### **Indigenous Populations, Community Engagement and Free, Prior and Information Consent (FPIC)**

- Nordson supports the principle of free, prior and informed consent (FPIC) and seeks to maintain open and positive relationships with all populations in the communities in which we operate, though Nordson does not maintain a formal FPIC process. In the event that Nordson operations have an adverse impact on any community in which we operate, Nordson is committed to engaging in dialogue with all affected populations. Nordson will not develop operations that would require the involuntary resettlement of indigenous populations.

## **Nordson Corporation Conflict Minerals Policy**

### **Regulatory Overview**

On August 22, 2012, the Securities and Exchange Commission (the “SEC”) adopted the conflict minerals rule (the “Conflict Minerals Rule”) as mandated by the Wall Street Reform and Consumer Protection Act, also known as the Dodd-Frank Act, which was signed into law in July 2010. The Conflict Minerals Rule is intended to reduce a significant source of funding for armed groups that are committing human rights abuses in the Democratic Republic of the Congo (the “DRC”) and its adjoining countries.

To the extent that “conflict minerals” are necessary to the functionality or production of products that Nordson manufactures or contracts to manufacture, we are required to conduct supply chain diligence to determine whether the conflict minerals originated in the DRC or one of the other “covered countries.” To the extent that our products contain conflict minerals that are necessary to their functionality or production, we are required to make certain disclosures on Form SD, a new SEC form. Additional disclosure obligations are triggered to the extent that the conflict minerals are from a covered country or we are unable to determine the source of the conflict minerals. Form SD must be filed no later than May 31 of each year pertaining to our use of conflict minerals for the previous calendar year.

“Conflict minerals” are defined in the Conflict Minerals Rule as cassiterite, columbite-tantalite (coltan), gold, wolframite and three specified derivatives: tin; tantalum; and tungsten. In addition to the DRC, the “covered countries” are defined in the Conflict Minerals Rule as: (1) Angola; (2) Burundi; (3) Central African Republic; (4) the Republic of the Congo; (5) Rwanda; (6) South Sudan; (7) Tanzania; (8) Uganda; and (9) Zambia.

### **Nordson Policy Statement**

Nordson is committed to full compliance with the Conflict Minerals Rule. Nordson further commits to refrain from, directly or indirectly, taking or supporting any action which contributes to the financing of armed groups that are committing human rights abuses in the DRC and other covered countries. Nordson has adopted this Policy as part of our efforts to encourage our suppliers to respect human rights and not contribute to conflict. Additionally, we are aggressively promoting the institution of this Policy to be in the position to provide our customers reasonable assurances that our products are conflict free if such assurances are requested.

Nordson does not typically source conflict minerals directly from mines, smelters or refiners, and, accordingly, in most cases, is several levels removed from these market participants. Therefore, Nordson requires the cooperation of its suppliers in the implementation of this Policy and in enabling Nordson to meet its SEC compliance obligations on a timely basis.

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### Supplier Requirements

Nordson will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. Consistent with the foregoing, those of our Suppliers who

supply or manufacture components, parts or products containing conflict minerals are expected to source those minerals from socially and environmentally responsible sources that do not directly or indirectly contribute to conflict or human rights abuses. Without limiting the foregoing, Nordson expects its suppliers to meet the expectations set out below.

#### All suppliers are expected to:

- familiarize themselves with the Conflict Minerals Rule;
- implement and communicate to their personnel and suppliers policies that are consistent with this Policy, and require their direct and indirect suppliers to do the same;
- put in place procedures for the traceability of conflict minerals at least to the smelter or refiner level, working with their direct and indirect suppliers as applicable;
- where possible, source conflict minerals from smelters and refiners validated as being conflict free, and require their direct and indirect suppliers to do the same;
- maintain reviewable business records for a period not less than seven (7) years supporting the source of conflict minerals; and
- from time to time, at Nordson's request, provide to Nordson written certifications and other information concerning the origin of conflict minerals included in products and components supplied to Nordson and the supplier's compliance with this Policy generally, and require their direct and indirect suppliers to do the same.

If a supplier is found in violation of this Policy, Nordson will take prompt, remedial measures to address the violation.

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