

NORDSON CORPORATION SUPPLIER CODE OF ETHICS

Nordson Corporation values its reputation for conducting business honestly and with integrity. For more than fifty 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 as critical to its success. We, therefore, engage suppliers who maintain a commitment to strong ethics standards. This Supplier Code of Ethics provides a foundation for Nordson and its suppliers to build and maintain relationships based on fairness, trust, respect for the rights of individuals, compliance with the law, and sustainable business practices.

Note: Nordson relies on many outside resources, including contractors, subcontractors, suppliers, vendors, consultants and others. For simplicity, all third-party providers of goods and services to Nordson are referred to as “suppliers” in this Supplier Code of Ethics.

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

- Abide by our gift and entertainment policy (See Appendix 1– Gifts Policy and Gifts and Entertainment of Government Officials Policy).
- Use fair employment practices and provide a safe and productive work environment for its employees. Wages and other related benefits should meet at least the legal or industry minimum standard in the country in which they do business. Applicable laws and industry standard on working hours in each country should be applied. Safe and healthy workplaces should be offered for all employees. Our suppliers will comply with minimum age requirements prescribed by applicable laws.
- Must not use or support, directly or indirectly, the use of forced or compulsory labor, or commit or support, directly or indirectly, other gross human rights violations and abuses such as widespread sexual violence, war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide, nor shall any employee be required to lodge “deposits” or identity papers when commencing employment. (See Appendix 2 – Policy Against Human Trafficking and Slavery.)

- Must not, directly or indirectly, support non-state armed groups through the extraction, transport, trade, handling or export of minerals. Such support includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who: (i) illegally control mine sites or otherwise control transportation routes, points where minerals are traded or upstream actors in the supply chain; (ii) illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; or (iii) illegally tax or extort intermediaries, export companies or international traders. (See Appendix 3 – Nordson Corporation Conflict Minerals 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.
- 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.
- Do business in an ethical and transparent manner, not offering bribes, kickbacks or improper payments of any kind to 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 as well as local anti-bribery laws in each jurisdiction in which they do business.

Nordson will use various methods to assess supplier and sub-contractor performance in these areas. The adherence to this Code 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 and sub-contractor performance. If a supplier or sub-contractor deviates from the requirements of this Code, appropriate corrective and preventative actions have to be taken. Suppliers or sub-contractors who persistently refuse to implement appropriate corrective and preventive actions or who have critical deviations against the Code run an increased risk of being excluded from current and future business with Nordson. Additionally, Nordson will immediately suspend or discontinue engagement with suppliers where Nordson identifies a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses described above.

All appendices referenced in this Code are incorporated by reference herein.

OUR COMMITMENT TO OUR SUPPLIERS

In our relationships with our suppliers, we

- Will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.
- We will support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by suppliers.
- Will not make payments to any employees of suppliers to attain lower prices 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 Supplier Code, you may contact a Nordson manager or, if that is not feasible, contact any resource on the Contact List at the end of this Supplier Code of Ethics.

Acknowledgment Form

By signing below, this acknowledges that [Supplier] has received a copy of Nordson Corporation Supplier Code of Ethics ("Code"). As a supplier for Nordson Corporation, [Supplier] and its employees are responsible for knowing and adhering to the principles and standards of Nordson's Code.

I further acknowledge and agree that Nordson's Code is intended to provide a general overview of our Company's policies, and does not necessarily represent all such policies and practices in effect at any particular time. I certify that [Supplier] and its employees will comply with all current and/or future versions of the Code, written policies, practices, rules, regulations or directives issued by Nordson Corporation.

[Supplier] will contact any of the resources on the Contact List if there are any questions concerning Nordson's Code, or any behavior or situation concerning Nordson Corporation. [Supplier] also understands that it has a responsibility to report any violations of the Code to any of the resources on the Contact List immediately.

Failure to follow Nordson's Code may result in being excluded from current and future business with Nordson.

[Date]

[Supplier] (Please Print)

[Signature]

[Print Name]

[Title]

Contact List

- Nordson Director of Supply Chain Management
 - John C. Dillon
(440) 985-4000

- Nordson Ethics and Compliance Coordinator
 - Robert E. Veillette
(440) 892-1580

- Independent Helpline: SAI Global ListenUp Internet
 - Website: www.listenupreports.com

Telephone

- USA or Canada: 888-391-3196
- Australia: 1800-987-636
- Austria: 0800-297-407
- Belgium: 0800-71-720
- Brazil: 0800-891-5884
- Canada: 888-391-3196
- China: 10-800-713-0606 (N) or 10-800-130-0614 (S)
- Colombia: 01-800-518-1467
- Czech Republic: 800-701-306
- Denmark: 80884379
- Finland: 0800-9-15443
- France: 0800-909-260
- Germany: 0800-182-4524
- Hong Kong: 800-903-282
- India: 000-800-100-3273
- Italy: 800-787-115
- Japan: 0053-113-0898
- Malaysia: 1-800-812-067
- Mexico: 001-866-287-0244
- Netherlands: 0800-023-1198
- New Zealand: 0800-452598
- Norway: 80015421
- Poland: 00-800-111-3997
- Portugal: 800-813-206
- Russia¹: 877-896-1985
 - Dial 8. Wait for dial tone. Dial 10-800-110-1011. Then dial above Russia number.

¹ Public phones require coin or card deposit. May not be available from every phone/public phone. Additional charges apply when calling outside Moscow, St. Petersburg.

- Moscow: Dial 363-2400. Then dial above Russia number.
- Outside Moscow: Dial 8. Wait for dial tone. Dial 495-363-2400. Then dial above Russia number.
- St. Petersburg: Dial 363-2400. Then dial above Russia number.
- Outside St. Petersburg: Dial 8. Wait for dial tone. Dial 812-363-2400. Then dial above Russia number.
- Singapore: 800-1301-147
- Slovakia: [PENDING]
- South Africa: 0800-983-583
- South Korea: 0030-813-1350
- Spain: 900-977-663
- Sweden: 020-793-185
- Switzerland: 0800-562-684
- Taiwan: 0080-114-8528
- United Kingdom: 0800-032-5546
- Unites States: 888-391-3196

Gifts

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.

This Policy Statement applies to Nordson, all of its subsidiaries, all associates, officers, directors, and agents of Nordson when representing Nordson and/or its subsidiaries (collectively referred to herein as “Nordson,” “Nordson associates” or the “Company”).

Key Terms

Immediate Family Members – includes Nordson associate’s spouse or domestic partner, any minor children, any older children living in the Nordson associate’s household or who rely primarily on the Nordson Associate for financial support, and any relatives (by blood, marriage or otherwise) living in the Nordson associate’s household.

Government Officials – As used in this Policy Statement, “Government Officials” means (a) any officer or Nordson Associate 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, Nordson Associate 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, Nordson Associates within these industries can be construed as Government Officials.

A. Basic Rules for Accepting Gifts

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.

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 above, 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 vendors.
 - 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 vendor is in attendance. Business entertainment where the customer or vendor is not in attendance is not considered an allowable gift.

B. Basic Rules for Giving Gifts

If a Nordson Associate is giving a gift to a customer and expects reimbursement, the gift must conform to Nordson's Code of Ethics and Business Conduct manual. However, regardless of whether a Nordson Associate is seeking reimbursement, a Nordson Associate's gift to customer or to customer's Immediate Family Members should be of a reasonable and customary value, and comply with applicable law.

A Nordson Associate should not give a gift to another Nordson Associate if the gift, to a reasonable person, is intended to improperly influence their performance.

Before giving gifts to associates of other companies, Nordson Associates should be aware that those associates are also subject to legal restriction on the receipt of gifts and that these restrictions apply to both the giver and the recipient. In light of these restrictions, unless the gifts are given due to a family or personal relationship, Nordson Associates should contact the Law Department before giving gifts to associates of other companies.

Regardless of whether or not a Nordson Associate is seeking reimbursement under Nordson's Nordson Associate Expense Policy, gifts to a customer or vendor should be of a reasonable and customary value and nature and lawful. No lavish gifts may be provided. In addition, such gifts cannot be given as a bribe or reward for an official or business act or under circumstances that otherwise represent, or create the appearance of, improper or illegal dealings with a customer or vendor.

Please note that separate and more restrictive policies apply in situations where Nordson associates are providing gifts, meals, and business entertainment to foreign or U.S. federal, state or local government officials or Nordson Associates as described in the policy entitled Payments to Government Officials.

Nordson Associates should note that Nordson's Code of Ethics and Business Conduct manual contains additional information on accepting and giving gifts to customers and vendors, and the manual should be consulted before giving any gift for which they intend to seek reimbursement.

C. Record Keeping Requirements

1. Nordson will maintain books, records and accounts which, in reasonable detail, accurately and fairly reflect all of Nordson's transactions. Nordson will maintain a system of internal accounting controls sufficient to reinforce compliance with this Policy Statement and provide reasonable assurance that:

- a. Transactions are executed in accordance with management's general and specific authorization;
- b. Transactions are recorded in the local "Gifts" general ledger account to permit preparation of financial statements in conformity with generally accepted accounting principles or any other criteria applicable to such statements, and to maintain accountability of assets;
- c. Access to Company assets and funds is permitted only in accordance with management's general or specific authorization;
- d. The accounts recorded on the Company's balance sheet should be reconciled to the underlying accounting detail at reasonable intervals and, where appropriate, compared to the physical assets. Appropriate action should be taken with respect to significant differences. This includes a full and complete description of the services performed, products purchased, or liabilities paid; approval from an appropriate level of management consistent with the approval authorities in place within the respective entity; date and amount of transaction; nature of payment required or accepted and identification of the recipient; terms and conditions of any settlements reached with a Government Official or government agency; and any other contemporaneous documentation that will more fully support the payment being made.

All expenditures described above must also be in compliance with all other relevant Nordson policies (e.g. travel and entertainment policies) in place for each Nordson location.

D. Reporting Obligations

In the event that any of the sensitive matters described above have occurred, it is your responsibility to immediately report the incident to the Nordson General Counsel. When reporting any such event please include the following information (to the extent you are aware of these details):

1. The amount and purpose of the gift;
2. The identification and line of business of the person providing or receiving the gift;
3. The circumstances under which the gift was made;
4. The manner in which the payment for the gift was made; including the character of the accounting entries made in connection with the payment;
5. The identity of any person who knows of the gift.

These standards can only be attained and maintained through the actions and conduct of all Nordson Associates. It is the obligation of each Nordson Associate to conduct himself/herself in a manner to ensure the maintenance of these standards. Insensitivity to or disregard for the principles of this Policy Statement will be grounds for appropriate disciplinary actions, up to and including termination.

While Nordson will make every effort to provide compliance information to all Nordson Associates and to respond to all inquiries, no policy or procedure, however comprehensive, can anticipate every situation that may present compliance issues. Responsibility for compliance with this Policy Statement, INCLUDING THE DUTY TO SEEK GUIDANCE WHEN IN DOUBT, rests with each Nordson Associate.

Payments to Government Officials

Introduction

It is the policy of Nordson to maintain the highest level of professional and ethical standards in the conduct of its business affairs. This Policy Statement is a reaffirmation of the importance of the highest level of ethical conduct and standards in Nordson's dealings with the U.S. and non-U.S. government employees and officials. Nordson's policy is to comply strictly with all laws and regulations regarding payments to government officials.

The provisions of this Policy Statement are not intended to substitute local laws and regulations and they shall apply only inasmuch as they are not incompatible with such local laws and regulations.

This Policy Statement applies to Nordson, all of its subsidiaries and affiliates, all employees, officers, directors, and agents of Nordson when representing Nordson and/or its subsidiaries (collectively referred to herein as "Nordson," "Nordson associates" or the "Company").

Key Terms

Government Officials – As used in this Policy Statement, "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.

Bribery – As used in this Policy Statement, “bribery” is the act of offering or giving anything of value, either directly or through agents or intermediaries, to Government Officials that is used to influence any decision, including, whether, or on what terms, to award new business or to continue business with a particular party, or to grant a reduction in taxes, import duties, or other fees or charges. Bribery includes any offer, payment, promise to pay, gift, promise to give, or authorization of the giving of “anything of value” to a Government Official, whether U.S. or foreign.

Facilitating Payment – Payments made to a Government Official to speed up or secure the performance of “routine governmental action,” essentially clerical activities, which does not involve the exercise of discretion. Examples of “routine governmental action” include obtaining permits, licenses or other official documents to qualify to do business; processing governmental papers such as visas and work orders; providing police protection and mail pick-up and delivery, or scheduling inspections; providing phone service, power and water supply, or loading and unloading cargo; and actions of a similar nature.

B. Payments to Government Officials

Gifts and entertainment for Government Officials are regulated by local law and rules and by the Foreign Corrupt Practices Act (“FCPA”), United Kingdom’s Bribery Act (“UK Bribery Act”), Canada’s Corruption of Foreign Public Officials Act (“Canada CFPOA”), and possibly similar laws in other foreign jurisdictions which carry potential criminal sanctions for violations.

Nordson specifically prohibits offering, giving, soliciting, or receiving any form of bribe or kickback (a return to an official of some part of a government payment for a good or service) to or from any Government Official. This prohibition covers direct or indirect payments and gifts of money or anything else of value, promises or offers to pay, and the authorization or approval of these actions. These are criminal acts and can result in criminal prosecution of both the individual involved and Nordson. Our employees’, officers’, directors’ and agents’ personal funds or resources also may not be used for such purposes.

C. Particularly Sensitive Transactions

1. Gifts

Gifts of cash are prohibited (including gift cards).

A gift may be provided as a courtesy or token of regard or esteem, or in return for hospitality. The gift should be of “nominal value” and normally should not exceed the lesser of \$100 USD equivalent, or the level established by local management.

The gift should be permitted under the laws of the foreign country and the regulations and guidelines of the official's governmental entity. It should be of a type and value that are customary in the foreign country and appropriate for the occasion.

All gifts to Government Officials that deviate from the above restrictions should receive advanced, written approval from the Nordson Law Department and should be documented and reported as part of the internal monthly reporting process.

2. Business Entertainment Expenditures

Reasonable and bona fide business entertainment during an official business trip is appropriate. However, the business entertainment expense should be unquestionably reasonable.

The expenditure should be permitted under local law and customer regulations and guidelines. It should be consistent with local custom and practice.

The business entertainment expenditure should avoid even the appearance of impropriety.

3. Facilitating Payments

Where customary and legal in the foreign country concerned, modest facilitating payments may be made to Government Officials to speed up or secure the performance of "routine governmental action," subject to the below guidelines:

- a. Pre-approval from the Nordson Law Department is required for all facilitating payments that meet the following criteria:
 - i. Exceed the lesser of \$100 USD equivalent or the level established by local management;
 - ii. The timing and nature of the facilitating payments are not well understood by, or communicated to, the Nordson Law Department and the senior executive management of the respective business unit.
- b. All facilitating payments must be recorded in an account called "Facilitating Payments Expense" within the local general ledger.

Nordson only allows these types of payments in countries where they are permitted under local law. The laws of many countries expressly forbid facilitating payments and there are significant penalties for the individuals making and authorizing such payments. Before making a facilitating

payment, it is strongly advised that you seek the opinion of the Nordson General Counsel and executive management.

4. Other Payments

All payments made directly to a Government Official, or to a Government Official through a third party should be avoided. These payments could be construed as bribes, even if that is not the intent. All such payments to settle liabilities with a government entity should be made directly to that government entity and not to an individual, unless approved in advance.

All payments made directly to a Government Official that are not considered a facilitating payment and exceed the equivalent of \$100 USD are required to receive advance, written approval from the Nordson Law Department.

5. Situations to Watch Out For

- a. Hosting parties, receptions, or other widely attended social gatherings where Government Officials are present.
- b. Solicitation of a gift by a Government Official.
- c. Providing a gift, entertainment, or meal to a Government Official because there is a personal relationship between you and the Government Official without consulting the Law Department to determine if the contemplated gift, entertainment, or meal is permissible.
- d. Offering or providing the use of Nordson property (e.g., Nordson facilities, luxury box) to a Government Official.
- e. Recognize that the definition of government official or government employee is broad and includes, but is not limited to, trustees, board members, appointees, and employees of public schools, public universities and colleges, municipal authorities, and public hospitals. In some cases, it may include officials and employees of government-owned or government-controlled businesses and other entities.

D. Record Keeping Requirements

Nordson will maintain books, records and accounts which, in reasonable detail, accurately and fairly reflect all of Nordson's transactions. Nordson will maintain a system of internal accounting controls sufficient to reinforce compliance with this Policy Statement and provide reasonable assurance that:

1. Transactions are executed in accordance with management's general and specific authorization;
2. Transactions are recorded as necessary (a) to permit preparation of financial statements in conformity with generally accepted accounting principles or any other criteria applicable to such statements, and (b) to maintain accountability of assets;
3. Access to Company assets and funds is permitted only in accordance with management's general or specific authorization;
4. The accounts recorded on the Company's balance sheet should be reconciled to the underlying accounting detail at reasonable intervals and, where appropriate, compared to the physical assets. Appropriate action should be taken with respect to significant differences. This includes a full and complete description of the services performed, products purchased, or liabilities paid; approval from an appropriate level of management consistent with the approval authorities in place within the respective entity; date and amount of transaction; nature of payment required or accepted and identification of the recipient; terms and conditions of any settlements reached with a Government Official or government agency; and any other contemporaneous documentation that will more fully support the payment being made.

All expenditures described above must also be in compliance with all other relevant Nordson policies (e.g. travel and entertainment and/or business expense reimbursement policies) in place for each Nordson location.

E. Reporting Obligations

In the event that any of the sensitive matters described above have occurred, it is your responsibility to immediately report the incident. Consistent with Nordson's Code of Ethics and Business Conduct, you must report the incident to one of the following (a) your immediate supervisor or manager; (b) the Nordson Law Department and the Ethics and Compliance Coordinator or (c) the external Helpline on the toll free number listed in the Index of Contact Information in the Code of Ethics and Business Conduct or online at www.listenupreports.com. When reporting any such payment, please include the following information (to the extent you are aware of these details):

1. The amount and purpose of the payment;
2. The identification and line of business of the person making the payment;
3. The circumstances under which the payment was made;

4. The manner in which the payment was made; including the character of the accounting entries made in connection with the payment;
5. The identity of any person who knows of the payment.

These standards can only be attained and maintained through the actions and conduct of all Nordson associates. It is the obligation of each Nordson associate to conduct himself/herself in a manner to ensure the maintenance of these standards. Insensitivity to or disregard for the principles of this Policy Statement will be grounds for appropriate disciplinary actions, up to and including termination.

While Nordson will make every effort to provide compliance information to all Nordson associates and to respond to all inquiries, no policy or procedure, however comprehensive, can anticipate every situation that may present compliance issues. Responsibility for compliance with this Policy Statement, INCLUDING THE DUTY TO SEEK GUIDANCE WHEN IN DOUBT, rests with each Nordson associate.



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.



Nordson Corporation Conflict Minerals Policy

Adopted: May 6, 2014

This document contains Nordson's policy regarding the use of conflict minerals in its products (this "Policy"). As used in this Policy, "Nordson" includes Nordson Corporation and its subsidiaries.

This Policy will be reviewed and updated as needed.

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.

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.