



GLOBAL HEADQUARTERS

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Edwards Responsible Minerals Sourcing Policy

Introduction

Responsible sourcing of minerals is essential to Edwards and though the Group does not procure directly from smelters/refineries, some parts of the supply chain do. To ensure responsible sourcing of minerals – tin, tantalum, tungsten and gold (3TG) – commonly labelled today as “conflict minerals”, Edwards has a comprehensive program to investigate the possible use of all conflict minerals included in components used in Edwards products. Cobalt was added to the program in 2020, and data collection and due diligence for this metal as well using Responsible Minerals Initiative (RMI) guidelines and Cobalt Reporting Template (CRT) will start in 2021.

Edwards is not in the scope of Dodd-Frank Act and EU regulation 2017/821, but based on concerns of violations of human rights including forced labor, human trafficking and child labor, and to support our customers’ obligation to these two Acts, the Group has measures to detect and prevent the use of conflict minerals in its supply chain.

As a member of the RMI, Edwards adheres to its guidelines by encouraging suppliers to source from smelters verified by a third party such as RMI’s Responsible Minerals Assurance Process (RMAP), commits to transparency by submitting reporting templates to customers about smelters in the supply chain and collaborates with stakeholders.

Requirements for our suppliers

Edwards requires its direct suppliers to commit to responsible sourcing of all minerals included in parts and products they sell to us. This commitment is exercised through minerals data collection and due diligence, implemented every year. Moreover, all our significant suppliers must sign our Business Code of Practice that contains an article on responsible sourcing requirements.

Process, Due Diligence and Disclosure of Information

1. Perform risk assessment and selection of relevant suppliers for data collection and due diligence according to OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
2. We request our suppliers conduct a reasonable country of origin inquiry to determine if the conflict minerals came from the DRC or its nine surrounding countries.



3. Perform analysis of smelters reported by our suppliers against RMI smelter database.
4. Implement Corrective/Action Plan with all suppliers that reported smelters of high risk based on RMI smelter database.
5. Encourage and educate our relevant suppliers on importance of reaching out to upstream smelters/refineries they provided them with conflict minerals and require them to engage with RMAP and obtain conflict free status.
6. Continue our partnership with RMI and collaborate with our customers and suppliers on improving situation in responsible sourcing.
7. Publish results of our due diligence and data collection from our suppliers, as well as efforts in implementing this policy, to contribute to general transparency on this topic for relevant stakeholders and the public.

Maggie Liang
Vice President Procurement Scientific and Industrial Vacuum

A handwritten signature in black ink, appearing to read 'Maggie Liang', written over a horizontal line.