



Pall Corporation

Code of Conduct



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Always
do the
right
thing!

Letter from Pall Corporation's CEO and President

Dear Fellow Employee:

Our success at Pall is built upon a foundation of integrity and a dedication to act according to the highest ethical standards. How we conduct business and how we treat others – our fellow employees, customers, suppliers and communities – determines how the world views us. Whether working as individuals within the Company, or as a Company within the global community, we must constantly be guided by principles of ethical behavior.

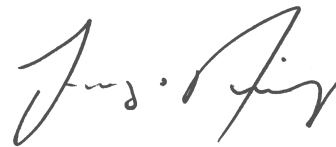
Pall has grown its business following a simple, yet effective, credo: “Always Do the Right Thing.” The Compliance and Ethics Program is based on this credo and the following “core” values:

- Customers First is not a slogan; it is how we treat them.
- We strive to be the Most Agile to meet customer needs before others do.
- Our Stakeholder relationships are all built upon Mutual Respect.
- The success of Pall Corporation depends on a culture of Personal Responsibility and Full Accountability.
- Absolute Integrity is the cornerstone of our Company and THE rule for how we do business.

This Code of Conduct focuses on how we deliver on these core values and emphasizes the importance of mutual respect, personal responsibility and accountability while doing business with absolute integrity.

The Code is not an exhaustive list of rights and wrongs, but provides critical information about expected behavior, our policies and the laws that govern our business. In combination with Pall's standard Employee Agreement and/or Labor Contracts, Pall's Employee Handbook and other Company policies and procedures, it provides the framework for all business decisions and strategies. If, after reading this Code, you have any questions, or wish to obtain advice or clarification on a compliance concern, please bring it to your supervisor, your Local Compliance Officer or contact the Legal and Compliance Department by emailing compliancequestions@pall.com.

Very truly yours,



Larry Kingsley
**Chief Executive Officer and
President, Pall Corporation**



Applicability of the Code of Conduct

This Code of Conduct has been adopted by the Board of Directors of Pall Corporation and applies worldwide.

“Pall” as used in this Code includes all Pall Corporation controlled companies. This Code applies to all directors, officers, employees and representatives, including consultants and agents.

The Chief Compliance Officer is responsible for implementing this Code. Waiver of all or part of the Code of Conduct will be granted only in exceptional circumstances and only with the approval of the Chief Compliance Officer. Any waivers for directors and executive officers must be approved by both the Chief Compliance Officer and the Board of Directors or a Board Committee and will be disclosed promptly as required by law and regulation.

Mandatory Compliance with Laws and Regulations

As a global company, we are subject to the laws and regulations of all the countries, states, provinces and municipalities where we have operations or do business.

Pall conducts business in many countries around the world. Our employees are citizens of different countries and belong to diverse cultural groups. As a global company, we are subject to the laws and regulations of all the countries, states, provinces and municipalities where we have operations or do business. In some instances, there may be a real or apparent conflict between the laws of two or more countries or between a country's laws and the Code of Conduct. In that case, you must immediately contact the Pall Legal and Compliance Department to obtain advice on how to resolve the conflict.

Failure to follow the requirements of the Code of Conduct or of Pall's policies, or violations of the law, is subject to discipline, which may include termination of employment. In addition, penalties for failure to comply with laws are severe and can result in fines, lawsuits, loss of business privileges and, in some cases, imprisonment of individuals. Pall reserves the right to contact legal authorities when there is a reasonable belief that a current or former employee has committed a crime.

The Manager's Role

Managers are expected to promote Pall's ethical culture and set a tone of integrity, never directing employees to achieve results by taking actions that are in violation of Pall policies, the Code of Conduct or the law.



Pall managers are expected to be ethical leaders. They are responsible for setting a good example, encouraging an environment of open and honest communication without fear of retaliation and taking prompt action when ethical issues are brought to their attention. Managers are expected to promote Pall's ethical culture and set a tone of integrity, never directing employees to achieve results by taking actions that are in violation of Pall policies, the Code of Conduct or the law. Managers also have approval responsibility for a variety of transactions on behalf of the Company. As a Pall manager or manager's proxy, you have important fiduciary responsibilities to ensure that policy requirements are met. Business results are never more important than ethical conduct and compliance with Pall policies and the law.



For more information visit [The Manager's Toolbox](#).

Q&A

As a manager, what should I do when an employee raises a concern?

When an employee raises a concern or asks for help, managers should remain objective, open and responsive. Don't think of a report as "bad news" but consider it a positive sign of employee commitment to doing the right thing. Be sure to report any compliance or business conduct and integrity issue right away to the Legal and Compliance Department.

Our Employees' Obligation to Raise Concerns – *Speak Up!*



As a Pall employee, you have a responsibility to **Speak Up** when you see or suspect something that could harm the company.

As a Pall employee, you have a responsibility to do the right thing and to share your concerns when you see or suspect something that could harm the Company. This includes speaking up promptly about anything you believe, in good faith, may constitute a violation of this Code, Company policies or a law. We also encourage you to come forward even if the situation “just doesn’t feel right.”

What is the best way to report a concern?

You should use the reporting channel that is most comfortable for you. For instance, you can talk with your manager, your HR representative or the Legal and Compliance Department. They have a responsibility to listen and help.

If you do not feel the outcome resolved the issue or you are not comfortable talking with your manager, HR or the Legal and Compliance Department directly, please contact the Compliance team through alternative means. The Compliance team is available to all employees, customers, partners, shareholders and other stakeholders who wish to raise concerns. You can report concerns anonymously – unless prohibited by law. The Compliance team manages all inquiries promptly and confidentially, consistent with legal obligations and the best interests of all concerned.

You can directly contact the Compliance team by:

Email: compliancequestions@pall.com

Or, report through the Pall **AlertLine**:

Online: <http://alertline.pall.com>

Phone: Visit Pall Connect or <http://alertline.pall.com> for a list of local access telephone numbers. You can also call the Chief Compliance Officer in New York at (516) 801-9844 or 2009844 if dialing from an internal line.

Retaliation is prohibited

Pall does not tolerate retaliation against an employee for a good faith question or report of misconduct. The fact that a coworker has raised a concern in good faith, or has provided information in an investigation, cannot be a basis for denial of benefits, termination, demotion, suspension, threats, harassment or discrimination. If any individual, regardless of his or her role at Pall, retaliates against a coworker who has truthfully and in good faith reported a violation, Pall will take appropriate action against all who are involved in the retaliation, including imposing discipline, which may include termination of employment. This is true even if it later turns out that the coworker was mistaken in reporting the original matter. However, if an individual has intentionally or in bad faith made a false report, Pall will respond accordingly, including subjecting that individual to discipline up to and including termination of employment.




Pall does not tolerate retaliation against an employee for a question or report of misconduct, made honestly and in good faith.

If you believe that you, or another colleague, have been retaliated against for raising a good faith concern, you should contact the Legal and Compliance Department by calling the Pall AlertLine or call Pall's Chief Compliance Officer in New York at (516) 801-9844 or 2009844 if dialing from an internal line.

How we investigate your concerns

Pall strives to respond to allegations of violations of Company policies or laws promptly and consistently. Depending on the type of issue, the right internal function(s) will get involved to investigate the allegations. It may be the Legal and Compliance team, HR, Internal Audit or other functions within Pall. Pall conducts investigations confidentially. If you are involved in an investigation, you are not to discuss it with anyone outside of the investigation team, unless you are specifically instructed otherwise. During investigations, employees are required to cooperate and tell the truth. If you do not, it could result in discipline up to and including termination from Pall.

 For more information see the [Pall Investigation Policy](#).

Q&A

I know of a situation that may violate our Code of Conduct. Should I report it even if I am not completely sure there is a problem?

Yes. You are responsible for reporting possible violations immediately. Report it to your manager, to the Legal and Compliance team, or call the AlertLine. Your report will be taken seriously and investigated. It is better to report a suspicion that turns out not to be an issue than to ignore a possible violation.

If I don't hear back about a report does that means it is not being acted on?

The Legal and Compliance team addresses all matters promptly but it may not be possible for the results to be communicated back to you due to privacy/confidentiality requirements. Calls to the multi-lingual Pall AlertLine (managed by a third party) or reports made through the AlertLine website are assigned a case number, so you can remain anonymous (unless prohibited by law) to Pall but still have the ability to follow-up on your concerns.

If I am asked to cooperate in an internal investigation, must I participate?

Yes. As a Pall employee, you are required to cooperate in internal investigations. Failure to do so may result in disciplinary action up to and including termination of employment.

What if my manager asks me to do something I am not comfortable doing?

In this situation, contact HR or the Legal and Compliance Department.

Ethical Decision Making



How we conduct our business and how we treat others ultimately determines how the world views us.

Make the right choices

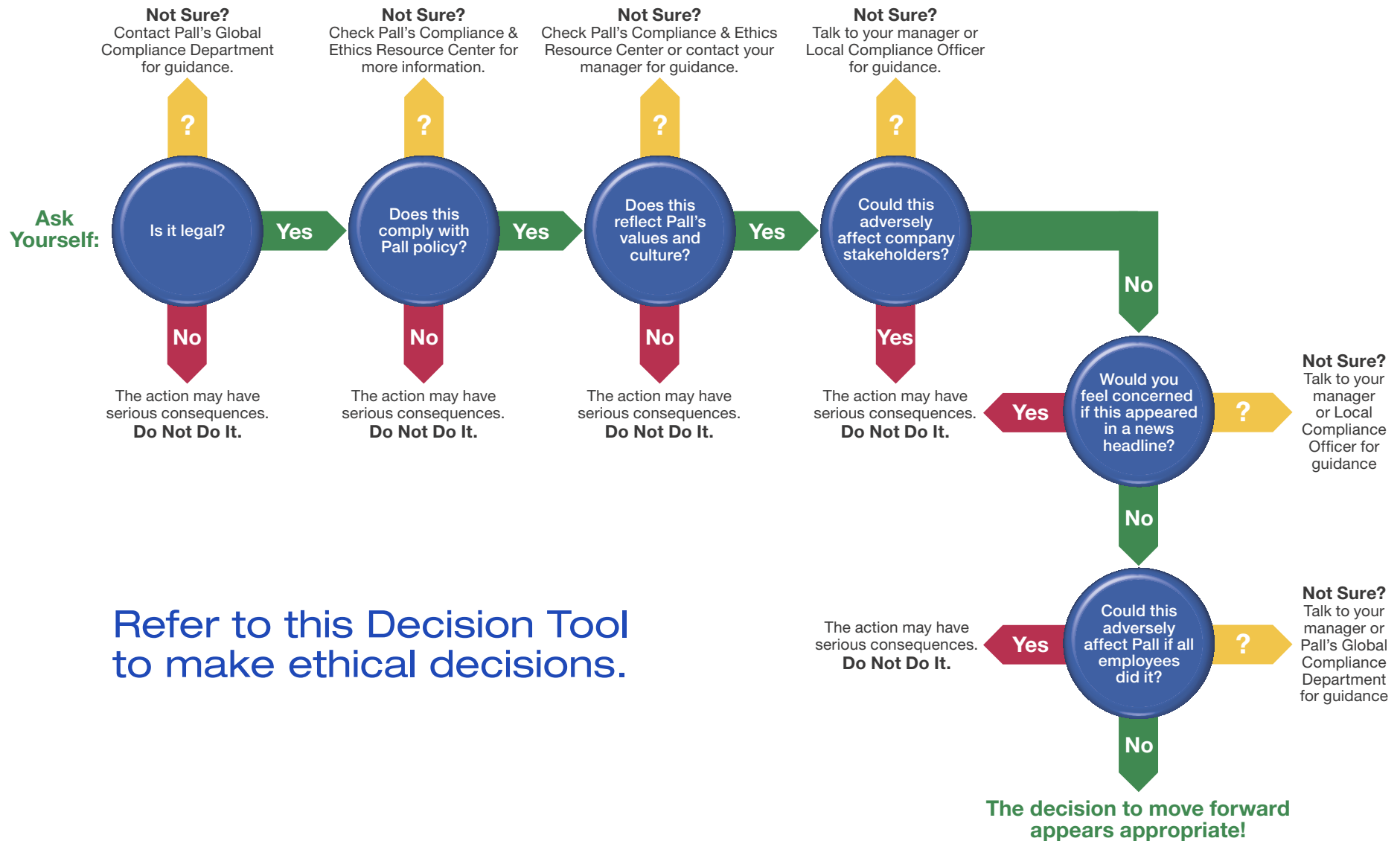
As an employee, you are expected to make decisions that are consistent with our core values, the requirements of the Code of Conduct, and that comply with all applicable laws and regulations in each country in which we do business. You also are responsible for knowing and complying with our Company policies. Your individual commitment to doing the right thing will protect and strengthen our reputation as a trusted global brand.

When you are faced with an ethical dilemma, you have a responsibility to take action. Doing the right thing at times is more difficult than doing the wrong thing or doing nothing at all. Ignoring a problem is, in itself, an action that can have serious consequences. Speak up if you see or suspect activity that violates our Code of Conduct.

Tip:

In these situations, the “right thing” may not always be obvious. Use the Ethics Decision Tool on the next page to guide you to the best course of action.

The Ethics Decision Tool



Individual Conduct



Discrimination

We are dedicated to preserving our positive culture and ensuring that each individual is treated with respect and dignity as a valued member of the Pall team.



We are proud of our global workforce. In recruiting, hiring, developing and promoting employees, decisions are made without regard to gender, race, color, national origin, ancestry, citizenship, religion, age, physical or mental disability, medical condition, sexual orientation, gender identity or gender expression, military/veteran status or marital status. We are dedicated to preserving our positive culture and ensuring that each individual is treated with respect and dignity as a valued member of the Pall team.

We are also committed to working with and providing reasonable accommodations for employees and applicants with physical or mental disabilities. Disabled employees are encouraged to provide notification from their doctor describing any restrictions on their ability to perform the essential duties or functions of their jobs.



See the [Pall Equal Employment Opportunity Policy](#).

Q&A

I feel that I'm being discriminated against by my manager. What should I do?

All Pall employees should have a work environment that is free from discrimination, harassment or retaliation by anyone. If you feel you're being discriminated against by your manager, you should speak to your next level manager or your HR representative. You can also call the AlertLine.

Harassment



Any type of harassment, including sexual harassment, is a violation of Pall philosophy and policy.

Pall prohibits conduct that singles out an employee or group of employees in a negative way because of gender, race, color, national origin, ancestry, citizenship, religion, age, physical or mental disability, medical condition, sexual orientation, gender identity or gender expression, military/veteran status or marital status. Any type of harassment, including sexual harassment, is a violation of Pall philosophy and policy.

Pall also strives to maintain a work environment that is free of all types of workplace violence. We will not tolerate violence, threats, threatening or malicious behavior or intimidation from any source.



For more information see the [Pall Non-Harassment Policy](#).

Q&A

What is harassment?

Harassment can be verbal, visual or physical in nature. Examples of prohibited harassing conduct include, but are not limited to, slurs, jokes, statements, notes, letters, electronic communications, pictures, drawings, gestures and other types of actions or communications that are unwanted and are based on an individual's gender, race, color, national origin, ancestry, citizenship, religion, age, physical or mental disability, medical condition, sexual orientation, gender identity or gender expression, military/veteran status or marital status.

Conflicts of Interest

Pall's Conflicts of Interest Policy is straightforward – we all have an obligation to act in the best interest of our Company at all times.

Examples of conflicts of interest can include a situation when you, a family member or a friend:

- Engage in activities that compete with, or appear to compete with, Pall's interests
- Let your business decisions be influenced, or appear to be influenced, by personal or family interests or friendships
- Use Company property, information or resources for personal benefit or the benefit of others
- Hire, supervise or have a direct or indirect line of reporting to a family member or someone with whom you have a relationship
- Have outside employment that negatively affects your job performance or interferes with your responsibilities at Pall
- Receive any personal or financial benefit from, have a financial interest in, provide services to or work for a supplier, customer or competitor or a company that seeks to do business with us.

To determine if you have a conflict of interest that should be disclosed, ask yourself these questions:

- Do my outside interests influence, or appear to influence, my ability to make sound business decisions?
- Do I stand to benefit from my involvement in this situation? Does a friend or relative of mine stand to benefit?
- Could my participation in this activity interfere with my ability to do my job?
- Is the situation causing me to put my own interests ahead of Pall's interests?
- If the situation became public knowledge, would I be embarrassed? Would Pall be embarrassed?

You must disclose potential conflicts of interest

Keep in mind that not all potential conflicts between an employee's interests and the Company's best interests are harmful or prohibited. Some conflicts of interest are permissible if they are disclosed and approved. Many times potential conflicts can be resolved by an open and honest discussion. If a relationship or transaction poses a conflict, you should immediately consult with the Legal and Compliance Department. Once a conflict is reviewed, it must be kept on file in the Ethics Office to be considered disclosed and approved.

Remember, having a conflict of interest is not necessarily a Code violation, but failing to disclose it is.



For more information see the [Pall Conflicts of Interest Policy](#).

Q&A

My spouse owns a company that Pall is considering hiring as a supplier. A contract with Pall would be great for my spouse's business. I would like to do anything I can to help my spouse win the contract. What can I do to help?

Helping your spouse's company is a conflict of interest. You should not do anything to help your spouse get the contract. If you are involved in the selection process, you should tell your manager and remove yourself from the situation. Even if you are certain you can be unbiased and award the contract to the best bidder, you should not be involved because of the perception of a conflict of interest.

One of Pall's office equipment suppliers has offered to give me the same discount Pall has negotiated to buy furniture and equipment for my home office. Is this acceptable?

Probably not. A supplier discount is only acceptable if it is available to all Pall employees. If the discount is offered only to you, then it is not appropriate. This situation could be a problem from a variety of perspectives: an improper gift, an attempt to influence Pall business decisions and an appearance problem.

Before I went to work with Pall, I started a company with a friend that distributed filtration equipment from many different manufacturers including Pall. Now that I work at Pall as a salesperson, can I continue to own part of my old company and let my friend run it by himself?

No, this relationship would create a significant conflict of interest. Your old company's sales of filtration equipment could result in direct competition with Pall for business. Even though you would be a passive investor in the business, the potential for you to have conflicting priorities is too great, and the situation would be unfair to both your partner and to Pall. You must immediately disclose the conflict of interest to your supervisor and to the Legal and Compliance Department and then sell your interest in the business if you wish to keep your job with Pall.

Joan, a supervisor, is responsible for finding the right person for an open position in her department. Since her cousin is well qualified, Joan hires her for the job. Is hiring her cousin a conflict of interest?

Yes, through her actions Joan has created at least the appearance of a conflict of interest. Although Joan believes that her cousin is more qualified than any other candidate, because Joan may be biased, she should have disclosed this conflict to her manager. In addition, and for the same reasons, if Joan's cousin is hired, the cousin should not report to her.

Insider Trading and Corporate Confidentiality



Avoid discussion of sensitive information anywhere that others may hear it, such as on public transportation or in elevators.

Do not trade on “inside” information

Inside Information is material, nonpublic information.

What is material information?

Information is considered “material” if there is a substantial likelihood that a reasonable investor would consider it important in making a decision to buy, sell or hold a security or the information would likely affect the market price of the security. Material information can be positive or negative and can relate to virtually any aspect of a company’s business.

What is nonpublic information?

Information is considered to be nonpublic unless it has been disclosed to the public, and sufficient time has passed for the securities markets to digest the information.

If you have material, nonpublic information relating to Pall or our business, it is our policy that neither you, nor any other person or entity related to you, may buy or sell Pall securities or engage in any other action to take advantage of, or pass on to others, that information. This also applies to trading in the securities of another company (for example, Pall customers, suppliers, vendors, subcontractors, and business partners), if you have material, nonpublic information about that company that you obtained by virtue of your position at Pall. Even the appearance of an improper transaction must be avoided. Please note that trading patterns are closely monitored by the government and Pall will cooperate fully with any government investigations of potential illegal trading.

Even a “tip” is unlawful

Pall employees also are prohibited from tipping off others; that is, passing along inside information to friends or family under circumstances that suggest that the Pall employee was trying to help someone make a profit or avoid a loss. Besides being a form of insider trading and therefore illegal, tipping is also a serious breach of corporate confidentiality. For this reason, you should avoid discussion of sensitive information anywhere that others may hear it, such as on public transportation or in elevators.

Derivatives and hedging transactions on Pall stock are not permitted

Pall employees are also prohibited from trading in any derivative Pall securities, such as put and call options, regardless of whether the employee has material, nonpublic information. Pall's policy also prohibits short selling or engaging in any other forms of hedging transactions, such as collars or forward sale contracts, because of the divergence it could create between objectives of employees and other shareholders.

Insider trading laws are complex and vary by country. For guidance or to ask questions, you should consult the Legal and Compliance Department.



For more information see the [Pall Insider Trading Policy](#).

Q&A

I heard from one of my teammates that Pall is planning to acquire a publicly traded company, but it hasn't been announced yet. Can I suggest to my friends that they buy stock in the company?

No. Not only would this violate your confidentiality obligations, but you could be charged with illegal insider trading as could your friend.

I overheard an employee of our joint venture partner say that they are facing major litigation. I'm not supposed to know this nonpublic information. In the past year, I have invested heavily in the partner. May I sell off some of my shares to avoid losing money?

No. You have come across inside information through your work for Pall. Insider trading laws prohibit trading the securities of our Company or any other company based on such inside information. You should check with the Legal and Compliance Department for further guidance.

I just found out that a customer is going to cancel a major contract with Pall. My father owns a lot of Pall stock. Can I tell him about the news so he can sell his Pall stock before he loses money?

No. Providing material, nonpublic information to a family member in order to allow them to trade in Pall stock is a form of insider trading called “tipping” and is illegal. Both you and your father can be charged with insider trading and would be subject to penalties, loss of profits and possible time in jail.

Communicating Responsibly

Our communications help us connect with each other, our customers and other stakeholders

Be careful how you talk to others – especially in any form of written communication, which includes electronic and online communications such as email, instant messaging, online chats, blogs or posts on social networking sites.

Be objective and professional. Avoid offensive, inflammatory or aggressive language, as well as anything that would embarrass or disparage Pall.

Be truthful and accurate. Misstatements, even if inaccurate, can put you and Pall in serious trouble. Do not exaggerate, make broad generalizations, speculate about matters with legal significance or make statements that could be taken out of context.

Tailor the scope and content of your communications appropriately. Whenever possible, pick up the phone. Do not send emails to people who do not have a legitimate need to receive them. Use large distribution lists and “reply all” sparingly. Only post information on public forums or social networking sites that is appropriate for a wide audience. Be concise and do not include unnecessary information or details.

Be careful not to disclose confidential or proprietary information that belongs to Pall or others except to those who have a legitimate need to know and are authorized to see the information.

Social Media

Pall supports the use of external social media such as social networking sites such as Facebook or Twitter, photo and video sharing sites, or blogs to foster learning and to connect and collaborate with others. Your participation on external social media sites is a matter of personal choice. We also support the use of certain types of internal social media to foster learning, strengthen communication and promote collaboration. Participation in internal social media should complement or support your role and responsibilities at Pall. If you choose to participate in either form of social media, you should:

- Ensure your communications do not violate the law (for example, harassment or copyright laws) or Company policies (for example, policies on disclosing confidential or proprietary information or speaking on behalf of Pall).
- Avoid identifying or discussing Pall, our clients, suppliers or your coworkers.
- Do not denigrate or insult others, including competitors.
- Never include Pall or client logos, trademarks, photos or videos.
- If speaking about your professional life, clearly state that these are your personal views and not necessarily the views of Pall.
- Safeguard your personal information.

 For more information see [Pall's Corporate Communications Policy](#).

Privacy

Pall Employee Information

Pall respects the privacy rights and interests of all its employees. The Company provides safeguards for the protection of its employees' personal information that is collected, held and used in the normal course of business. Everyone must respect the privacy rights of coworkers and handle all employee personal information in accordance with [Pall's Privacy Policy](#).

Many countries have privacy or personal data protection laws

Pall is committed to protecting the reasonable privacy expectations of everyone with whom we do business, including our customers, vendors/partners, visitors to our websites and employees. If you have access to personal data (including data hosted by a third party) as part of your work, it is important that you collect, access, use, or share such data only to the extent necessary and relevant to do your job and in accordance with Pall policies, local laws and regulations. If questions arise, consult the Pall Legal and Compliance Department.

Q&A

I accidentally received an email with a file containing the salaries of several other employees. May I share it with other people at work?

No. You and your friends at work have no business reason to have this information. You should delete the email and bring the error to the sender's attention. Disclosing the information to anyone, including other employees, is a Code of Conduct violation.

A former Pall employee has listed me as a reference in his application for a job. An HR representative from his prospective employer has called me to ask for my recommendation. Can I give the recommendation?

No. Pall policy is that only Pall HR representatives can respond to requests for information about former Pall employees. Pall will only confirm that a person is a former employee and that person's salary at the time the employment relationship ended. This policy is intended to protect the Company and you. If you give the recommendation and the former Pall employee does not get the job, she/he could allege that you and the Company are responsible.

Proprietary Information

What is proprietary information?

Proprietary information is valuable information that Pall owns, has the right to use, or to which it has access. Proprietary information often represents the product of our hard work and can include, but is not limited to:

- Intellectual property – such as trademarks, patents, copyrights and trade secrets owned or licensed by Pall,
- Engineering drawings for current or potential new products,
- Customer lists and agreements, market share data, supplier agreements, strategic plans, etc.,
- Written or oral agreements between Pall and employees, agents, strategic partners and/or other third parties,
- Company financial information (e.g., invoice registers, payroll records, financial statements, accounts payable summaries, vendor listings, price and cost information, etc.), and
- Financial and other business information about potential acquisitions.

Pall employees should hold the information they have about the Company, including its business, operations, products and strategies, in strict confidence and should not provide this information to anyone who is not authorized to receive it. Many Pall employees also have access to information regarding Pall's customers and business partners and, therefore, have a similar obligation to preserve the confidentiality of that information as well.

Requests from External Parties

The disclosure by Pall of confidential, proprietary information to third parties requires that a written Non-Disclosure agreement (“NDAs”) be in place.

If you have questions on how to handle proprietary information, or questions about NDAs, please contact the Pall Intellectual Property Counsel or your Regional Counsel.

Q&A

A friend who works for another company asked me to provide the names of some of my business contacts. My friend's company does not compete with Pall. Is it okay to give her this information?

Business contact information is not only confidential but, because it can identify an individual, it is considered personal data. It should not be shared with anyone except as required or with the permission of the business contact. If you believe your friend could use the services of your business contact's company, you could either ask your business contact if he or she is comfortable with you sharing his or her contact information, or pass along your friend's company information to your business contact (with your friend's permission).

Responsibilities to Pall



Quality


Our goal is to foster the kind of environment where people feel safe and are treated with courtesy and professionalism at all times.



Quality Assured. Quality Delivered

At Pall, we provide world class products and services that are designed, produced and delivered with the primary consideration of the safety and health of our customers, product users, employees and others who may be affected.

In all activities, you must follow the Pall Quality Policy and use the tools provided by the Pall Enterprise System. All required inspections and testing operations must be properly completed.

 For more information see the [Pall Quality Policy](#).

Safety

We are committed to providing a safe and non-threatening workplace

Our goal is to foster the kind of environment where people feel safe and are treated with courtesy and professionalism at all times. This includes providing the proper training and tools required to maintain our safety standards. Employees must do their part by following all security and safety guidelines and reporting any unsafe conditions or accidents.

A safe and secure workplace also means a workplace free from violence. Threats (implicit or explicit), intimidation and violence have no place at Pall and will not be tolerated. Remember too that weapons are not allowed at the workplace. You should report any acts of violence toward another person or to Company property immediately.

? For more information see the [Pall Safety Policy](#).

We have a strict substance abuse and alcohol policy

Employees are not permitted to use, possess, sell, transfer, manufacture, distribute, or be under the influence of alcohol, illegal drugs or controlled substances (except when the controlled substance is prescribed by a licensed medical practitioner) on Pall-owned or leased property during working hours, while on Company business or while using Company property. These prohibitions do not include the reasonable consumption of alcohol by an employee of legal drinking age at functions sponsored by the

Company (e.g., business dinners with customers or during Company conferences). Violation of this policy will result in disciplinary action, up to and including termination of employment.

? For more information see the [Pall Drug Free Workplace Policy](#).

Q&A

Our work safety standards far exceed what is required by law where I work and our competitors only follow local requirements. Shouldn't we do the same?

No. We must adhere to our Company safety policies. Pall is committed to providing employees with a safe and secure environment everywhere we operate, even if this means we exceed local requirements.

My team gets an annual bonus if we meet or exceed our safety goals. One of my coworkers cut his finger on the job and needed stitches. He doesn't want to report the injury as a workplace injury because it will hurt our goals and bonus. What should I do? I want to get the bonus too.

While everyone wants to get a bonus, not reporting a workplace injury is a serious violation of Pall's reporting requirements. Both you and your injured teammate could be subject to disciplinary action up to and including termination for not reporting the injury. Not reporting prevents us from correcting a potential safety risk. We want employees to earn safety bonuses because of a truly safe work environment, not because of injuries that go unreported.

Sustainability and Environmental Management

We work to reduce and minimize the use of hazardous materials and the environmental impact of our manufacturing processes and we expect our suppliers to do the same.



At Pall, we thrive on helping customers protect people, the environment and our natural resources. Pall is implementing innovations that advance medicine, consume less energy and make alternative energy possible, purify and conserve water, and minimize emissions and waste. We are dedicated to helping customers lessen their carbon footprints, maximize recycling and waste reduction, and ensure the most efficient utilization of natural resources and raw materials. We apply that same know-how and dedication to our own operations. Our approach to environmental stewardship is proactive and anchored in a culture of continuous improvement.

A number of environmental laws and regulations apply to our worldwide business operations. We have a responsibility to understand and follow these requirements including;

- Conserving energy, water, raw materials and other natural resources,
- Managing materials and wastes properly, and
- Complying with environmental permits and health and safety requirements.

We work to reduce and minimize the use of hazardous materials and the environmental impact of our manufacturing processes, and we expect our suppliers to do the same.

 For information see the [Pall Environmental Policy](#).

Copyrights



Be sure that you have authorization before you use third-party copyrighted material.

Most published information, including data found on the Internet, has copyright protection assigned to it by the owner. It is against Pall policy—and, in fact, may be unlawful—to copy, reproduce, digitize, distribute, broadcast, use, or modify third-party copyrighted material in the development, or as part, of Pall products, promotional materials, written communications and blogs and other social media, unless you first obtain written permission from the copyright holder. This requirement may apply

regardless of whether the end product is for personal use, Pall internal use, external or other use. Improper use of copyrighted material can lead to civil and criminal actions against the Company and, in some instances, against individual employees. If you have questions, please contact the Legal and Compliance Department.



For more information see the [Pall Copyright Procedures](#).

Q&A

A colleague in another company recommended a management training video that he said was helpful to his team. I'd like to show it to my team, but I can't justify the cost. Can I borrow his video and make a copy?

Video materials are copyrighted, which means that they cannot be copied. Sometimes, even the original video cannot be borrowed and reshowed without the copyright owner's permission. If you want to show the content to your team, you must buy a legitimate copy of the video. Do not assume that further showings would be acceptable. Verify the rights obtained by Pall before showing the video again.

IT Security

Pall has the right to require security controls on all electronic and computing devices used to conduct Pall business.



Know our information security policies

Pall has stringent information security policies to protect our electronic intellectual property. These include policies on data classification and protection, password protection, remote access controls and the appropriate use of computing devices and networks. Pall has the right to require security controls on all electronic and computing devices used to conduct Pall business or interact with internal networks and business systems, whether owned or leased by Pall, the employee or a third party.

Note: Pall also has the right to inspect at any time, all messages, files, data, software, or other information stored on these devices or transmitted over any portion of the Pall network.



For more information see the [Pall IT Policies](#).

Q&A

I left my computer on an airplane and my passwords were in my computer bag. What should I do?

You should immediately file a police report and ask for a copy. Then immediately contact Pall Information Security to report the theft. Familiarize yourself with Pall's IT Security Policies. You should never keep your passwords with your laptop or other password-protected devices.

I would like to download onto my laptop computer a free software application that I also have on my home computer. Is this OK?

Probably not. Often, software may be free for personal use but not for business use. You must check with the IT Department for approval on whether it is acceptable software to download onto your Pall laptop computer.

Company Resources

Company assets should be used first and foremost for business purposes and to advance our strategic objectives.



Company assets are provided for business use

Company assets should be used first and foremost for business purposes and to advance our strategic objectives. Careful and professional use of Pall's physical assets, email, computers and other communications systems for work are acceptable. Our copyrighted works (such as documentation, graphics, images, videos, audio recordings and software) should only be used for approved business purposes. We each must guard against waste and abuse. Company assets include not only Pall's physical resources (such as facilities, money, equipment, and information

technology systems), but also other non-physical resources (such as intellectual property, trade secrets, invention disclosures, sensitive business and technical information, computer programs, and business and manufacturing know-how). **You have no expectation of privacy when using the Company's facilities or resources**, as they belong to Pall. Therefore, material transmitted or stored on Company resources may be retained or reviewed.

Note: When employees use their personal devices (smartphones, tablets, etc.) for work, they still need to protect any Company-related information that is exchanged or stored on those devices.

Limited personal use

Occasional use of Company assets for personal reasons is permitted, within reason, as long as it does not adversely affect job performance (yours or that of your coworkers).

Activities that are Prohibited or Require Authorization

Use of Pall assets for non-Company purposes:

- Do not borrow or remove Pall resources from Company premises without proper authorization.
- Never use Pall resources to support a personal business, consulting effort or outside fundraising activity.

Company Resources (continued)

- Even Pall resources that have been identified as “scrap,” garbage or destined for recycling cannot be used for non-Company purposes without approval.
- Pall trademarks should not be used on non-Company materials or as part of any domain name that is not registered, used, and controlled by the Company.

Negative impact

Your use of Company resources should never result in significant added costs, disruption of business or any disadvantage to Pall.

Unlawful or offensive

Do not access, distribute, download, or upload material that is prohibited by law, that negatively reflects on Pall, or that contains sexual content, offensive language or derogatory comments about race, gender, sexual orientation, age, religion or about any protected group.

Political activities

You cannot participate in political activities while at the office. You may participate in political activities on an individual basis, with your own money and on your own time.

Q&A

I recently started selling personal care products to friends and family to supplement my income. May I place online orders for my customers at work, and use photocopy machines to print copies of my order forms during work hours?

No. Your intended use of Pall property is strictly for your personal benefit, is not related to the conduct of Company business, and may be perceived as interfering with your ability to perform your work-related responsibilities. While the occasional personal use of Pall property is permitted while conducting Company business, it must be limited and not interfere with the performance of your work-related responsibilities.

I often work in the office after hours. Sometimes, when I am alone in the office late at night, I read personal emails that some may find obscene and forward them along to my friends. I figure that I am not disturbing anyone, and I do not think I am harming our Company since I am doing this after business hours. Am I right?

No. It is never okay to use Company computers or network systems to view or forward inappropriate emails, even if you are alone in the office, at home or on a business trip, or are forwarding the email to someone who is not employed by Pall. This is an inappropriate use of Company time and resources, and may result in disciplinary action up to and including termination.

Contracting Authority

Authority to enter into and sign contracts on Pall's behalf is delegated to different Pall team members depending on the nature, parties, scope and financial value of the contract involved.

To promote efficiency, ensure compliance with legal, accounting and financial reporting requirements, and protect Pall's assets from fraud, waste and abuse, Pall has published a Delegation of Authority Policy that governs the negotiation and approval of contracts between Pall and its customers, suppliers, business partners and other stakeholders.

Authority to enter into and sign contracts on Pall's behalf is delegated to different Pall team members depending on the nature, parties, scope and financial value of the contract involved. If you are involved in negotiating any contracts for Pall, make sure you understand and follow Pall's Delegation of Authority Policy and ensure that all necessary approvals have been obtained.

 For more information see the [Pall Delegation of Authority Policy](#).

Financial Records

The timely, accurate handling and reporting of financial information is not only required by law, but it is also at the core of our commitment to do business honestly and ethically.

From purchase orders to sales forecasts, we must be truthful and transparent when recording financial information. The timely, accurate handling and reporting of financial data is not only required by law, but it is also at the core of our commitment to do business honestly and ethically.

Manage Pall Finances Responsibly and Accurately

All Pall employees are personally responsible for any Company-related funds that they control. Company funds must only be used for Pall business purposes. Every employee must ensure we receive good value and maintain accurate and timely records for each expense. This includes anything purchased from third parties. It is a violation of the Code of Conduct to hide, falsify, misrepresent or alter documents or data regarding the use of Pall funds.

Adhere to Pall's expense reporting policies

Pall employees are required to comply with Pall's travel and expense reporting policies. In particular, employees must submit all business expenses in approved tools and accurately categorize expenses. Failing to report a transaction, mischaracterizing a transaction or creating false or inaccurate documentation, is strictly prohibited and can result in employee disciplinary action up to and including termination.

 See [Global Travel Guidelines and Expense Reimbursement Policy](#).

Employees with Financial Reporting Responsibilities

In addition to the Code of Conduct, our CEO, CFO, all of the Finance Department, and certain other Pall employees, have special obligations to provide finance-related information that is accurate, complete, objective, relevant and understandable. These individuals must ensure our Company's commitment to the fair and timely reporting of Pall's financial results and condition.

A violation, including failure to report potential violations, of these obligations will be viewed as a serious matter and may result in disciplinary action, up to and including termination. If you believe that a violation has occurred, please contact the Pall Legal and Compliance team, Internal Audit or the Audit Committee of the Board of Directors. As with the Pall Code of Conduct, it is against Pall policy to retaliate against an employee for good faith reporting of any potential or actual violation of these reporting obligations.

Q&A

What if my manager is exerting pressure to “make the numbers work?”

Your responsibility is to be honest and accurate. If you feel pressured to do otherwise, contact the Legal and Compliance team or HR. You may also contact the Audit Committee of our Board of Directors. If you feel uncomfortable going through internal channels, you can call the multilingual Pall AlertLine anytime, night or day, worldwide.

What if I am asked to book a deal without a purchase order?

All sales transactions must be accompanied by a purchase order from a customer. These sales records ensure that our finance records and reports are accurate and protect the Company from fraud. Refer to the [Revenue Recognition Policy](#) for the required elements of a purchase order.

A salesperson is pressuring a Pall distributor to place orders at the end of Pall's fourth quarter for products that the distributor cannot sell with the promise that the distributor will be able to return them to us after the end of our fiscal year. Are these acceptable transactions?

No. These are fraudulent transactions and cannot be booked as they will result in non-existent sales showing up in Pall's financial records and reports. Anyone found to be knowingly involved in this type of transaction will be subject to disciplinary action, up to and including termination.

Records Management

We collaborate and exchange information in various forms, whether it is an email, video, audio recording, on databases, in applications such as the Pall Enterprise System (PES) or in an electronic or paper document. Maintaining, storing and retaining these items for the right amount of time is part of records management. To ensure we remain compliant with legal and business requirements, you must be aware of Pall's Records Management Policy.

In general, employees should retain all information that meets the definition of a Pall business record, or relates to a legal matter (pending or anticipated) or to an audit. If you receive a "Legal Hold" from the Pall Legal team, you must follow its instructions and retain all documents specified in that directive. Electronic records should be managed in Company-approved repositories (not on unapproved personal devices or unapproved third-party cloud providers).

Paper and other physical records should be stored in a Company-authorized offsite location, or secured in onsite file cabinets or access-controlled file rooms. Retention guidelines can vary depending on the nature of the content and the region in which you work. Be familiar with the Pall Records Management Policy and applicable Regional Retention Schedule to determine how long to keep your content and to prevent the destruction of information related to an investigation, claim or lawsuit. Contact Pall's Records Manager or the Legal and Compliance Department for assistance.



See [Pall's Records Management Policy](#) and Retention Schedules for [The Americas](#), [EMEA](#), and [Asia Pacific](#).

Q&A

Ben learns that his Department will be examined by a regulatory agency. He knows that some of the documents the agency has requested contain inaccurate information, so he shreds these documents. Is he doing the right thing?

No. Ben must not conceal, alter or destroy any documents that have been requested by a regulator. Without the documents he has shredded, Ben cannot provide the examiner with a complete response. This would qualify as falsification of records, which is against the law and carries severe consequences.

John has a large number of electronic documents that he needs in order to create a response to a request for proposal from an important client. John wants to work on the request for proposal at his home on weeknights and over the weekend. John downloads the documents to Dropbox, an on-line, cloud-based file sharing storage service. Is this all right?

No. Dropbox is not an approved location for storing Company records. John should arrange with IT to obtain access to the documents he needs through a Pall Virtual Private Network (VPN) account.

Communities, Customers & Government



Anti-Bribery, Anti-Corruption and Fraud

Pall will sacrifice business opportunities rather than pay bribes, and we will support our employees when faced with losing sales owing to a refusal to pay bribes.



Pall has zero tolerance for bribery and corruption

A “bribe” is the offer or promise to give, or the giving of, anything of value or some other advantage to improperly influence the actions of a public or private third party. Bribes may include money, gifts, travel and other expenses, hospitality, below market loans, discounts, favors, business or employment opportunities, political or charitable contributions, or any direct or indirect benefit or consideration. Improper influence typically involves the intent to secure a quid pro quo to buy the misuse of someone’s position.

When doing business internationally, giving or receiving anything of value to influence a business decision or government action can be considered a bribe or kickback. Therefore, in all of our business interactions it is essential to act with the utmost integrity, honesty and transparency, and comply with regional and national anti-corruption laws such as the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.

Specifically, we do not promise, offer, demand, give or accept any advantage (which can include anything of value, not just cash) as an improper inducement for an action that is illegal, unethical or a breach of trust. Check Pall’s Anti-Corruption and Ethics Policy for a list of bribery red flags to watch out for.



For information see the [Pall Anti-Corruption and Ethics Policy](#).

Our Partners’ Behavior

Pall also seeks business partners (distributors, agents, vendors and suppliers) who share our values of transparency and honesty in all business dealings. We require our business partners to undergo an appropriate level of due diligence and to adhere to the Pall Corporation Supplier Code of Conduct, including a commitment to prohibit all forms of bribery or corruption. Pall provides training for its partners on these requirements.



For more information see the [Pall Supplier Code of Conduct](#).

Q&A

One of my customers is planning a trip from her office in Southeast Asia to visit Pall's headquarters to meet with our executive management team. My customer told me that she expects to be reimbursed for all of her trip expenses, including personal expenses she plans to incur while touring the area. Can I approve this?

No. You may not approve reimbursement for the customer's non-business-related expenses, such as sightseeing trips or plane tickets for family members. Pall cannot pay for these expenses since doing so might create the appearance of bribery. All reimbursable expenses must be (1) directly related to a bona-fide business purpose, (2) reasonable and (3) permissible under all applicable laws and Pall policies.

We use an agent to facilitate relations with local government officials. Recently he asked us to increase his commission significantly even though we have not expanded the scope of his responsibilities or asked him to perform additional work. I suspect he wishes to pass this money on to the local officials. What should I do?

If you suspect that the agent is making illegal payments on Pall's behalf, the Company is under an obligation to investigate whether this is the case and to halt any such payments. You should report your suspicions to your manager or to the Legal and Compliance Department.

I am told that in a particular country it is a common practice to pay a small "gratuity" to a customer prior to their purchase of a Pall product. Should I pay the "gratuity" so that I do not lose the business?

No. We do not engage in business that is available only through improper or illegal payments. The Legal and Compliance Department should be contacted if you are unsure whether a requested payment is permitted. If you become aware of the use of gifts, bribes, gratuities, kickbacks, secret payments or inducements to anyone, including customers, their agents or employees (or members of their families), to generate business, you should immediately contact the Legal and Compliance Department.

Gifts and Entertainment



You should be careful not to create a situation that would suggest a conflict of interest, divided loyalty, or the appearance of an improper attempt to influence business decisions.

Successful working relationships with our business partners are vital to our success. Therefore, under certain circumstances and, where necessary, with the express prior approval of your manager, you may consider offering a gift to, or accepting a gift from, a customer or business partner. However, you must take care not to create a situation that would suggest a conflict of interest, divided loyalty or even the appearance of improperly attempting to influence business decisions.

What are gifts?

“Gifts” mean anything of value, including entertainment, such as invitations to a sporting event or dinner. Any gift that is given to a customer or other business partner, or that you receive, in the course of your employment should:

- Have no obligation or expectations (stated or implied).
- Be made openly.
- Have reasonable value.
- Conform to the recipient’s rules.
- Be appropriate, legal and accurately documented.

When are gifts acceptable and when are they inappropriate?

Certain gifts to or from a business partner are generally acceptable and require no pre-approval. These are:

- Nominal gifts with a combined market value of **U.S. \$100** or less to or from a single source within one twelve month period,
- Occasional business meals and entertainment valued at less than **U.S. \$200** per person, to or from a single source within one twelve month period.

If you wish to give or receive gifts, or participate in business meals or entertainment, with a single source, and the value of the gifts, meals or entertainment will exceed these annual dollar limits, you must obtain prior approval from your manager and the Legal and Compliance Department.

Gifts between employees are certainly allowed, but should be done respectfully. Care should be taken with gifts between managers and their direct reports, or when a group of employees collect money for a group gift for an employee.

Certain other gifts are never appropriate and must not be given or received. These include any gift that has the appearance of impropriety. Examples of inappropriate gifts include the following:

- Anything that is illegal, unsavory, offensive, or would embarrass Pall.
- Cash or a cash equivalent (e.g., gift cards).
- Something given as part of an agreement to do anything in return (quid pro quo), such as a gift in connection with a tender or bidding process.
- Using your own money or resources for gifts or entertainment above the dollar limit for a customer, vendor or supplier.

Special Rules for Government Employees and Agencies

Stricter rules and Pall policies apply when we interact with government entities and their employees or representatives at the federal, state, provincial or local level. Nothing of value should ever be promised, offered or provided to a government employee, either directly or indirectly, in an attempt to influence him or her to act or refrain from acting in connection with obtaining any business advantage when dealing with government entities.



See the [Pall Business Entertainment and Gifts Policy](#).

Pall Donations to Charities

Corporate donations from Pall to a government entity, or corporate charitable donations to a non-profit/non-governmental entity must comply with [Pall's Charitable Contributions Policy](#). If you are asked by a business partner or some other source to make or recommend such a donation, please adhere to the approval process outlined in that policy.

Q&A

May I accept a business meal from a supplier?

In most circumstances, modest and infrequent business meals may be accepted. However, whenever a supplier pays for a meal, always consider the specific circumstances and whether your impartiality could be compromised or appear to others to be compromised. If the meal is offered during contract negotiations, you must always politely decline the invitation. Talk with your manager if you are unsure.

As part of my job, I work with a local government official. Since it's the holiday season, can I give him a fruit basket?

No, unless you have permission from the Pall Chief Compliance Officer or your Regional Compliance Officer. If government officials or employees of government-owned/controlled entities (such as telephone companies, public universities and hospitals) are involved, the anti-corruption laws around the world and Pall policies are much stricter in prohibiting gifts to prevent bribery or even the appearance of bribery. For more information, review the [Anti-Corruption and Ethics Policy](#).

What if a supplier offers me two great tickets to a World Cup match? May I accept them?

No. Whether the tickets were offered for your personal use or in conjunction with a business meeting, this type of offer is expensive and may be viewed by others as an attempt to influence business decisions.

An outside organization offered to pay for my travel to an event they are hosting. May I accept it?

It depends on who is offering it, the reason for travel and any risk of an actual or perceived conflict of interest. There are certain situations where it's permissible to accept reasonable travel and accommodations from a customer, partner, vendor or third party. Refer to the [Pall Global Travel Guidelines and Expense Reimbursement Policy](#) for specific guidance or contact the Legal and Compliance Department if you are unsure.

Antitrust and Competition

Antitrust and competition law violations can result in heavy penalties for the Company and for involved individual employees.



Pall competes aggressively in the marketplace to best serve our customers' needs and enhance shareholder value. However, we must always remember that the Company is subject to antitrust and competition laws in most of the countries where we do business. These laws are complex and vary from country to country. In general, these laws prohibit agreements or actions that unreasonably restrain trade or reduce competition.

You must never discuss or exchange information (or even appear to be discussing or exchanging information) with competitors about:

- Product development or marketing practices and strategies;
- Prices, pricing methods, pricing plans, credit terms, discounts, allowances or any data that bears on price;
- Cooperation in any way on bids (sharing information, dividing targets);
- Dividing up territories; or
- Competitive strategies or other confidential information.

Other activities to avoid include:

- Agreements with any party not to deal with certain companies or classes of companies;
- Requiring that a customer buy products or services that it does not want in order to get the products or services it does want;
- Entering into a resale price agreement with a distributor or otherwise trying to force a distributor to comply with a suggested resale price (you can discuss with the distributor why a suggested resale price makes sense, but you cannot pressure the distributor to comply); or
- Disparaging or unjustly criticizing competitors' products or services (factual comparisons are acceptable as long as you have the data and analysis to back up your views).

It is important to avoid activities that may appear to violate antitrust or competition laws. For example, all written communications referring to our competitors should be business appropriate in tone and refrain from language that could be construed as encouraging anti-competitive behavior.

Trade association meetings and other industry gatherings such as trade shows serve legitimate and worthwhile purposes. However, these meetings pose certain risks, as they bring together competitors who might discuss matters of mutual concern and potentially cross the line of acceptable conduct under antitrust and competition laws. Even joking about inappropriate topics, such as marketing or pricing strategies, could be misinterpreted and misreported to the authorities. If the conversation turns to any kind of anti-competitive discussion, you must refuse to discuss the matter, leave the conversation immediately and report the incident to the Legal and Compliance Department.

Remember that antitrust and competition law violations can result in heavy penalties for the Company and for involved individual employees.

Q&A

What can I do if a reseller complains to me about low prices at another reseller?

Advise the reseller that you cannot discuss or attempt to influence pricing of other parties since this could violate antitrust laws.

Import and Export Controls

All employees are responsible for following import and export laws.

Various governments and multinational organizations control the international movement of certain goods, services and technical information. They also maintain trade embargoes and economic sanctions on certain targeted countries, entities and individuals. These controls may apply to imports, exports, financial transactions, investments, and other types of business dealings. Some countries also prohibit or control re-export of items beyond their original destination. Pall will comply fully with these laws.

Sometimes, an export can take place even without movement between countries, such as technical data that is communicated electronically, orally or visually at conference calls or web meetings. Often we plan to travel with our laptop which contains export controlled technical information such as design drawings. If that happens, you need to have an approved export license in place before leaving the country with your laptop. If you are unsure whether you need to obtain an export license, you should always consult the Global Trade Compliance team.

For additional information on how you can support Pall's international trade compliance obligations, please visit the [Global Trade Compliance \(GTC\) website](#) on Pall Connect.



See [Pall's Import and Export Policies and Procedures Manual](#) and [Pall Ban on Trade Policy](#)

Q&A

I received an order from a distributor for products destined for a country under U.S. sanctions. What should I do?

The trade restriction laws are complex and countries and individuals subject to them change constantly. You must comply with Pall policy and consult with the Global Trade Compliance team to determine whether your transaction involves a country, individual or other party subject to a trade restriction. Do not pursue the transaction unless you obtain prior written approval from the Global Trade Compliance team.

We have “controlled” technology consisting of engineering drawings and specifications from the United States on our project. Can we send the “controlled” technology to our Pune India office since it is a Pall company?

No. “Controlled” technology cannot be released outside of the United States without prior approval in the form of an approved export license from the appropriate U.S. Government Agency. The Global Trade Compliance team can help you get the necessary export license.

Government Contracting



Pall will comply with all government procurement laws and special rules as they apply to our business around the world.

Doing business with any government agency has its own unique challenges and rewards. Pall will comply with all government procurement laws and special rules as they apply to our business around the world.

Pall also takes extraordinary care to comply with the distinctive rules that apply to contracting with the U.S. Government. At all times, Pall will follow the U.S. Government's rules for competing fairly, will honor restrictions that apply to interactions with U.S. Government employees (e.g., gifts and employment), will deliver products and services that conform to specifications and will adhere to government accounting and pricing requirements. We also will claim only allowable costs, and will ensure the accuracy of data submitted to any government agency.

Q&A

I noticed that one of our subcontractors billed a government customer for a U.S. \$10,000 pump that was not part of their order. Could this be fraud? Should I just let the subcontractor worry about it?

While this may or may not constitute fraud, you must not ignore suspicious activity relating to government contracts. Report the matter immediately to your manager, the Pall Government Contracts group, or the Legal and Compliance Department.

Human Rights

Pall is committed to ensuring we are not complicit in any human rights violations. We hold our suppliers and partners to the same high standards.



Pall seeks to ensure that its employees are treated with respect and dignity, are working under their own free will, and are being properly compensated for their effort. We are opposed to slavery, human trafficking, forced labor and child labor and are committed to complying with applicable laws prohibiting such exploitation. Pall is committed to ensuring we are not complicit in any human rights violations. We hold our suppliers and partners to the same high standards.



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COC-E-4.15.2014