

EXPORT CONTROL DIRECTIVE

Since the late 1980's the export of economic goods gained increasing importance due to global political development, particularly in the high-tech and armament industries. Because of possible misapplication (dual use) and the advancing globalisation, existing export control regulations had been tightened and in the first place introduced in Asia.

As a globally active supplier in the fields of vacuum and coating, Oerlikon Leybold Vacuum (OLV) wants to be the source address for clients in market segments with a promising future.

We do not produce weapons or armament goods, but experience shows that especially vacuum technology is an indispensable medium for very many state-of-the-art production processes, and consequently, its use also extends into the field of mass destruction weapons.

As a globally acting enterprise, we therefore need guidelines for all our sales activities that are applicable throughout the corporation. Based on the aforesaid, and in recognition of its own highest due responsibility before the law, management has resolved as follows.

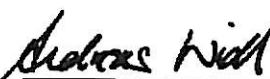
1. OLV feels at home in numerous countries. As a matter of course we know their export control regulations and comply with them strictly.
2. Our corporate goal of actively supporting a policy of non-proliferation has priority over commercial interest. Without prejudice to the legal permissibility of a specific transaction – we shall neither directly, nor indirectly supply products, documents, technologies or services, if we know or have reason to believe that such items may ultimately be used in sensitive countries for weapons of mass destruction or for missile systems deployed to this end.
3. This does also apply to domestic business, if we know or have reason to believe, that our products will be supplied into critical projects of sensitive countries via other companies.
4. In order to ascertain which countries and entities should be regarded as sensitive for the purpose of this policy, we will also maintain contact with the responsible agencies continuously.

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5. In case of concerns we immediately will consult the responsible authorities. Provided US export control regulations are concerned due to composition/character of the export good (US pre-product/know-how), we additionally contact the responsible US Department of Commerce for advice and information. In the event of any continued concern regarding the end use, the transaction shall be immediately terminated.

6. This policy applies worldwide. It is to be immediately implemented within the framework of the existing Internal Compliance Program, and must be monitored continuously. The undersigned will ensure that all managers implement this directive by means of appropriate measures.

Cologne, Feb. 24, 2009



Dr. Andreas Widl



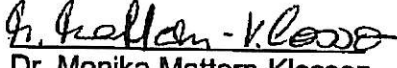
Marcus Sander



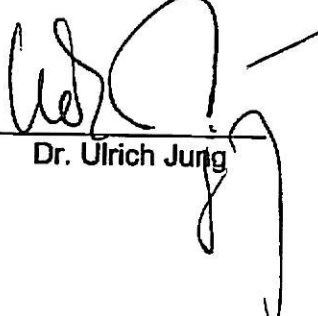
K. H. Ewald



Wolfgang Ehrk



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