



WATERS CORPORATION: GLOBAL COMPLAINT REPORTING POLICY

Effective: July 24, 2020

Last Updated:

Section 1. Purpose

Waters Corporation (including our subsidiaries and affiliates, unless the context otherwise requires, “Waters” or “the Company”) is committed to complying with and requires its employees, executive officers, and directors (collectively, “Company Parties”) and other persons acting on its behalf to comply with all applicable legal and regulatory requirements as well as all Company policies. Every Company Party has the responsibility to assist the Company in complying with these obligations. It is the policy of the Company to encourage support and cooperation of all Company Parties in meeting the Company’s commitment and responsibility to such compliance.

The Company’s internal controls and operating procedures are intended to prevent, deter, and remedy violations of applicable laws, regulations, and Company policies. However, even the best systems of control cannot provide absolute safeguards against such violations. The Company may investigate and report to appropriate governmental authorities any violations of applicable legal and regulatory requirements and the actions taken by the Company to remedy such violations.

This policy is designed to establish procedures that provide for (i) the receipt, retention and treatment of complaints received by the Company; and (ii) the submission by Company Parties or others of potential legal or compliance concerns involving the Company. In addition, this policy clearly establishes that it is the policy of the Company that any Company Party who provides information or makes statements in good faith and in furtherance of this policy will not suffer any retaliation by the Company or any Company Party for providing such information or making such statements.

Section 2. Reporting Potential Wrongdoing and Violations of Law

If any person suspects that the Company, a Company Party, or others acting on behalf of the Company, have violated any applicable laws, regulations, or Company policies, then such person should immediately report any such suspicion to: Legal, Compliance, or ethics@waters.com.

A. Anonymous Reporters and Identified Reporters

Company Parties may anonymously file reports of suspected wrongdoing covered by this policy.

When filing a report, a person other than a Company Party must include (1) his or her name, (2) contact information; and (3) their relation to the Company or any Company Parties involved in the suspected misconduct (if any).

B. Content of Reports

Regardless of the method of communication, all reports must be sufficiently detailed and include (1) information sufficient to identify the issue reported; (2) the identity of any parties involved in the alleged misconduct (including any involved Company Parties); and (3) any evidence or other information/materials supporting the allegation.

Section 3. Investigation of Alleged Wrongdoing

Any member of Legal or Compliance who receives a report pursuant to Section 2 of this policy must notify the Chief Compliance Officer of such report as soon as reasonably possible. The Chief Compliance Officer should receive and review reports submitted via the ethics@waters.com email address as soon as reasonably possible. Reports that the Chief Compliance Officer reasonably perceives to include potential violations of law or material violations of Company policy, should be provided to the General Counsel, or his or her designee, as soon as reasonably possible.

Following receipt of a report made under Section 2 of this policy, the General Counsel, the Chief Compliance Officer, or their respective designees, as appropriate, (the "Investigating Party") shall commence such investigation as he or she, in his or her reasonable judgment, deems appropriate.

The Investigating Party shall be authorized to retain other individuals, including, without limitation, outside legal and accounting experts, as he or she deems appropriate to assist in such investigation.

The Chief Compliance Officer shall periodically report to the Audit Committee the volume and nature of the reports submitted under Section 2 of this policy.

Section 4. No Retaliation for Submitting Statements of Alleged Violations or Concerns

There will be no retaliation by the Company or any Company Party against any Company Party who makes a report pursuant to this policy even if after investigation the Company determines that there has not been a violation of any applicable laws, regulations, or Company policies. However, Company Parties who make reports or provide evidence which they know to be false or without a reasonable belief in the truth and accuracy of such information will not be protected by the provisions of this Section 4 and may be subject to disciplinary action.

Section 5. Corrective Action

If any Company Party believes he or she has been subjected to any action that violates Section 4 of this policy, he or she may file a complaint with the Chief Compliance Officer, who shall notify the General Counsel of any such complaint. The General Counsel, the Chief Compliance Officer, or their respective designees, as appropriate, (the “Investigating Party”) may conduct an investigation of such complaint as he or she, in his or her reasonable judgment, deems appropriate. The Investigating Party shall be authorized to retain such other individuals, including, without limitation, outside legal and accounting experts, as he or she deems appropriate to assist in such investigation. If, after conducting an investigation, the Investigating Party determines that a Company Party may have experienced any improper action in violation of Section 4 of this policy, then the Audit Committee shall be notified of the results of the investigation and any appropriate corrective action recommended by the Investigating Party.