

Entegris, Inc.

Code of Business Ethics



Values



At Entegris we aspire to be a company like no other, comprised of passionate, self-driven problem-solvers who understand the importance of embracing Entegris' core values, working in teams and exhibiting personal drive with an innovative spirit.

We expect all employees to work to a high standard. We depend on all of our employees and associates to display actions, attitudes and behaviors reflective of our values at all times.

PEOPLE AND TEAMWORK

We will treat people with respect and dignity in a collaborative environment that aligns organization, achieves high performance and rewards team success.

ACCOUNTABILITY, INTEGRITY AND TRUST

We will act honestly and consistently with all. We will accept responsibility to deliver results and commit to openly communicate.

CREATIVITY AND INNOVATION

We are committed to an environment in which people are encouraged to disseminate knowledge, take risks, openly share ideas and turn them into business opportunities.

DEDICATED TO EXCELLENCE

We will set high standards for performance and strive to be best in class through outstanding leadership at all levels.

A Message from Bertrand Loy

President and Chief Executive Officer



Entegris has a proud tradition of adherence to the highest standards of ethics and integrity in the conduct of its business. Each Entegris employee is a custodian of

that tradition. The Entegris Code of Business Ethics is a worldwide corporate policy designed to assist employees in upholding that tradition. Today's business environment is complex and much has changed over the years, but one thing that has not changed is our belief that maintaining our good reputation depends on each of us being personally responsible for our conduct.

While the need for employees to fulfill ethical responsibilities is beyond question, the definition of the specifics of those responsibilities may not always be as clear. The purpose of the Entegris Code of Business Ethics is to provide this guidance by specifically addressing certain common ethical issues and to explain Entegris' position with respect to breaches of ethical responsibilities. Of course no code of ethics can foresee all possible situations which may arise, so Entegris ultimately relies upon the integrity and judgment of our employees "to do the right thing." An important step in meeting our day-to-day ethics and compliance responsibilities is to understand our responsibilities under

the Code of Business Ethics and our commitments to each other, to our customers, our business partners, and to the communities where we work and live. This Code of Business Ethics sets out the standards for our behavior as we conduct Entegris' business including complying with the law and applying our good judgment each and every day.

If you are unsure of what to do in particular circumstances or concerned that the Code of Ethics, our policies or guidelines are being broken, you have a responsibility to speak up. A problem cannot be resolved unless it has first been identified. It's quite simple: if you have a question, or believe there may be a violation, speak up.

I believe that the quality of our people, and our commitment to ethics and compliance will not only enable us to succeed today, but will help us to achieve long-term success. I am convinced that working together, in line with our values and this Code of Ethics, we will not only meet our goals, but we will also continue to be proud of *how* we achieve success.

Sincerely,

A handwritten signature in black ink, appearing to read "Bertrand Loy". The signature is stylized with a large loop at the top and a sharp, angular end.

Bertrand Loy

President and Chief Executive Officer

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Our Commitment to Ethics and Compliance

This Code of Business Ethics (Code of Ethics) states the ethical standards for how we, as Entegris employees, will work together to develop and deliver products, how we will protect the value of Entegris and how we will work with customers, suppliers and others.

All of us at Entegris must comply with the Code of Ethics when conducting Entegris' business.



It has always been Entegris' policy to be a good citizen of the United States and of every other country in which we conduct business. Good citizenship demands respect for and compliance with the requirements of law. Entegris will obey all laws and regulations that are applicable to our business and operations – both in the United States and in other countries. Where applicable laws and regulations are ambiguous, we recognize our obligation to obtain such legal or other advice as is necessary to clarify their meaning and assure compliance. Honesty and integrity is an essential characteristic of the Entegris culture; it is critical that it be present at all levels of the organization.

Our success is based on strong relationships of mutual respect and trust with our customers, suppliers and others. Treating our business partners with honesty and integrity is critical to building these relationships.

Since Entegris operates globally, we need to be especially aware of different laws and customs that apply. While we respect the norms of our customers, business partners and coworkers throughout the world, all employees must at a minimum comply with the standards and principles in this Code of Ethics unless they are inconsistent with local law, in which case you should seek guidance from the Compliance Officer.

To Whom this Code of Ethics Applies

This Code of Ethics applies to all officers, directors and employees of Entegris, Inc. and its subsidiaries worldwide. In addition, the Code of Ethics applies to all temporary and part-time employees, contractors and agents that we hire to conduct our business; for convenience we refer to all of these persons as employees in this Code of Ethics. In those affiliated enterprises over which Entegris does not have control, Entegris representatives are expected to use their influence to achieve compliance with the spirit and content of the standards of conduct set out in the Code of Ethics. Certain business partners, such as agents, consultants and vendors serve as an extension of Entegris. They are expected to follow the spirit of the Code of Ethics, as well as any applicable contractual provisions, when working on behalf of Entegris.

Managers who supervise our business partners are responsible for ensuring that they too understand our ethical standards. If an external business partner fails to comply with our ethics and compliance expectations and their related contractual obligations, it may result in the termination of their contract.

How to Use this Code of Ethics



Entegris is committed to conducting business in accordance with the highest standards of honesty, integrity and accountability; this Code of Ethics will help our employees meet that critically important commitment. The Code of Ethics specifies the standards of behavior for Entegris employees and will serve as a resource when you need information about our policies or standards or when you are faced with a difficult ethical situation.

It's impossible to anticipate every question you may have or every situation you might face, so in addition to the Code of Ethics, Entegris also has other resources that can be of help. These additional resources are listed throughout the Code of Ethics as well as on Entegris' intranet site, *Ensider*. The Company relies on you to use good judgment and to seek help when you need it.

Overseeing Compliance at Entegris

Primary responsibility for coordination of the compliance, communication and training activities to support the Code of Ethics as well as for managing the compliance reporting, monitoring and enforcement activities resides with the Compliance Officer (CO) who is appointed by the Chief Executive Officer or the Entegris Board of Directors. The CO is authorized to establish a compliance committee or other management body to assist and advise the CO in carrying out his or her responsibilities. The General Manager of each strategic business unit and of each regional and functional organization shall be directly responsible for assuring compliance with the substantive ethical standards of the Code of Ethics by employees working for the organization for which he or she is responsible. Until another person is designated by Entegris' Chief Executive Officer or the Entegris Board of Directors, the Compliance Officer shall be the Senior Vice President & General Counsel. If a compliance committee is established, a list of the members and the Compliance Committee's charter, will be posted on *Ensider*, and will also be available from Entegris' Law Department.

Using the Ethics and Compliance Hotline

If you see or suspect any illegal or unethical behavior, or if you have a question about what to do, talk to your manager and ask for help. Sometimes, you may not be able to talk about an issue with your manager. If that's the case, you have several options. You may contact Human Resources, the CO, or any attorney in the Company's Law Department.

At all times, and for any type of concern, you also have the option of making an anonymous report by calling Entegris' Compliance Hotline – 1-877-208-8383 (in the United States). To report concerns from locations outside the U.S., refer to the list of dedicated phone numbers posted on *Ensider*: Corporate > Business Ethics > [4. How to Report Compliance Violations](#). Reports may also be made online at <https://reportlineweb.com/entegris> or via U.S. mail to the dedicated compliance mailbox:

Entegris Compliance Officer
P.O. Box 305
Billerica, MA 01821

What to expect when you use the Compliance Hotline

The Compliance Hotline is available 24 hours, seven days a week. Trained specialists from an independent third party provider of corporate compliance services, will answer your call, document your concerns and forward a written report to the CO for investigation. When you contact the hotline you may choose to remain anonymous. All reports will be treated equally whether they are submitted anonymously or not.

- After you make a report, you will receive an identification number so you can follow up on your concern. Following up is especially important if you have submitted a report anonymously, as we may need additional information in order to conduct an effective investigation. This identification number will also enable you to track the resolution of the case; however please note that, out of respect for privacy, the Company will not be able to inform you about individual disciplinary actions.
- Any report you make will be kept confidential by all individuals responsible for reviewing and investigating the matter.

Entegris has an opportunity to improve every time you ask a question or raise a concern. When you take action, speak up and report questionable conduct, you are protecting your colleagues and our reputation. Remember, an issue cannot be addressed unless it is brought to someone's attention.

Q+A

QUESTION:

Our manager typically does nothing when concerns about potential misconduct are brought to her attention and I believe she makes things difficult for coworkers who raise issues. Now I have a problem. A coworker is doing something that I believe to be ethically wrong. What should I do?

ANSWER:

Take action and speak up. Starting with your manager is often the best way to efficiently address concerns. However, if you do not believe that it is appropriate or do not feel comfortable doing so, you should talk to another member of management, or any of the resources listed in the Code of Ethics.

QUESTION:

What if someone misuses the Compliance Hotline, and falsely accuses someone of wrongdoing?

ANSWER:

Experience has shown that the Compliance Hotline is rarely used for malicious purposes, but it is important to know that we follow up on all calls and anyone who uses the Compliance Hotline in bad faith to spread falsehoods or threaten others, or with the intent to unjustly damage another person's reputation, will be violating this Code of Ethics and will be subject to disciplinary action up to and including termination.

Q+A

QUESTION:

I suspect there may be some unethical behavior going on in my business unit involving my manager. I know I should report my suspicions, and I'm thinking about using the Compliance Hotline, but I'm concerned about retaliation.

ANSWER:

After you make the report, if you believe you are experiencing any retaliation, you should report it. We take claims of retaliation seriously. Reports of retaliation will be thoroughly investigated and, if they are true, retaliators will be disciplined up to and including termination.

Our Non-Retaliation Policy

You can report ethical violations in confidence and without fear of retaliation. It is expressly prohibited for any supervisor or manager to discipline, discriminate against or take any action of retaliation against any employee who reports information with a good faith belief in its truth, whether or not the information is ultimately proved to be correct. In short, Entegris will not tolerate any retaliation against an employee who asks questions, makes reports of possible violations of the Code of Ethics or policies, or assists in an investigation of suspected wrongdoing.



Employee Responsibilities

Each of us must take responsibility for acting with honesty and Integrity, even when this means making difficult choices. Meeting our responsibilities is what enables us to succeed and grow, today and in the future.

- Always act in a professional, honest and ethical manner when acting on behalf of Entegris.
- Know the information in the Code of Ethics as well as Entegris policies and procedures, paying particular attention to the topics that pertain to your job responsibilities.
- Be a resource for others. Be proactive. Look for opportunities to discuss and address ethics and challenging situations with others.
- Help create an environment where everyone feels comfortable asking questions and reporting potential violations of the Code of Ethics and policies. Respond quickly and effectively to concerns that are brought to your attention.
- If you supervise third parties, ensure that they understand their ethics and compliance obligations.

Remember: no reason, including the desire to meet business goals, should ever be an excuse for violating laws, regulations, the Code of Ethics or Entegris policies.



Q+A

QUESTION:

I'm a manager and I'm not clear what my obligations are if someone comes to me with an accusation – and what if it involves a senior leader?

ANSWER:

No matter who the allegation involves, you must report it without exception. Entegris provides several avenues for reporting concerns. If for any reason you are uncomfortable making a report to a particular person, you may talk to any of the other resources listed in the Code of Ethics or another member of management.

QUESTION:

I'm a manager. If I observe misconduct in an area not under my supervision, am I still required to report the issue?

ANSWER:

You are chiefly responsible for employees, contractors and third parties under your supervision, but as a leader you are especially obliged to take action. The best approach is to talk first with the manager who oversees the area where the problem is occurring, but if this doesn't work, or isn't feasible, you should use other resources listed in the Code of Ethics.

Q+A

QUESTION:

I just learned that a good friend of mine at work has been accused of sexual harassment and that an investigation is being launched. I can't believe it's true and I think it's only fair that I give my friend an advance warning or a 'heads up' so she can defend herself. Don't I have a responsibility as a friend to tell her?

ANSWER:

Under no circumstances should you give her a 'heads up.' Your friend will be given the opportunity to respond to these allegations and every effort will be made to conduct a fair and impartial investigation. An allegation of sexual harassment is a very serious matter with implications not only for the individuals involved but also for the Company. Alerting your friend could jeopardize the investigation and expose the Company to additional risk and possible costs.

Cooperating with Investigations

Every employee is required to cooperate fully and truthfully with all internal and external investigations. With respect to inquiries from regulators, we must never mislead any investigator and never alter or destroy documents or records in response to an investigation.

All requests for information other than what is provided on a routine basis should be reported to the Law Department immediately. When we are notified of an external investigation, we will take prompt action to preserve documents that may be relevant.



Making the Right Choice – Guidelines for Ethical Decision-making

Making the right decision is not always easy. There will be times when you'll be under pressure or unsure of what to do. Always remember when you have a tough choice to make, you're not alone. Your colleagues and management are available to help, and you have other resources to turn to including the Code of Ethics, our policies, your colleagues, and the Compliance Hotline.

When faced with a tough decision, it may help to ask these questions:

- Is it legal?
- Is it consistent with our Values, this Code of Ethics and Entegris policies?
- Is it based on a thorough understanding of the risks involved?
- Will I be able to look myself in the mirror and be proud of the decision?
- Would I still be comfortable with the decision if it appeared in the newspaper?

If the answer to any of these questions is no, stop and ask for guidance.

Q+A

QUESTION:

My business unit sets various goals that we are asked to achieve. Sometimes I feel pressured to violate the Code of Ethics and policies to achieve these goals. Is this acceptable?

ANSWER:

No. While successful businesses set high goals and employees strive to achieve them, you should never violate the Code of Ethics or Entegris' policies to achieve your goals.

Accountability and Discipline

Compliance with the ethical standards referred to in the Code of Ethics is of critical importance to Entegris. Accordingly, a breach of the Code of Ethics will result in disciplinary action ranging from warning and reprimand to immediate dismissal depending on the individual circumstances of each situation. Also subject to discipline under the Code of Ethics are employees who: (1) fail to seek legal advice from Entegris' Compliance Officer or his designated representative; (2) act contrary to advice from Entegris' Compliance Officer or his or her designated representative; (3) fail to provide information concerning a suspected violation of law, of this Code of Ethics or of other Entegris policies; or (4) retaliate against anyone for reporting a suspected violation. Further, in appropriate circumstances, Entegris will demand restitution for losses sustained and may initiate civil or even criminal legal proceedings against an offending employee. It is recognized that the cost associated with pursuing such legal actions will seldom be justified on the basis of the potential recovery. Since the preservation of the integrity of Entegris' ethical standards is critical, any such legal action will be evaluated on the basis of the principle established rather than the economic cost/benefit of the particular case.

No Waiver

No waiver of the application of the Code of Ethics to an officer or director in a particular circumstance, or generally, shall be made without the prior approval of the Audit & Finance Committee of the Entegris Board of Directors. Any other exceptions must be specifically approved by the Company's Compliance Officer.

Our Responsibilities to One Another

We owe each other honesty, respect and fair treatment and we need to always treat others as we would want to be treated. This is the basis of our commitment to one another and is the foundation of our success. To maintain our commitment and to attract and keep talented individuals it is vital that we continue to have a professional and respectful work environment.

Maintaining this environment not only helps Entegris succeed, it also creates a setting where each of us can thrive and reach our full potential. What follows are some of the key principles we must follow to implement our commitment to our Values and to each other.



Diversity and Non-Discrimination

Entegris brings together employees with a wide variety of backgrounds, skills and cultures. Combining such a wealth of talent and resources creates the diverse and dynamic teams that consistently drive our results. Our colleagues, job applicants and business partners are entitled to respect and should be judged on the basis of their qualifications, demonstrated skills and achievements.

Entegris will not discriminate in the hiring, discharge, compensation, promotion or benefits offered to any employee, applicant for employment or retiree on the basis of race, color, sex, religion, ancestry, age, disability, national origin, citizenship status, marital status, sexual orientation or military/veteran status. All Entegris employees and applicants for employment will be treated equally according to their individual qualifications, abilities, experiences and other employment standards.

MAKE SURE YOU:

- › Treat others respectfully and professionally.
- › Promote diversity in hiring and other employment decisions.
- › Do not discriminate against others on the basis of any characteristic protected by law or Entegris policy.

WATCH OUT FOR:

- › Comments, jokes or materials, including emails, which others might consider offensive.
- › Inappropriate bias when judging others. If you supervise others, judge them on performance. Avoid introducing unrelated considerations into your decisions. Use objective, quantifiable standards.

TO LEARN MORE:

- › Discuss any questions or concerns about diversity and equal opportunity with Human Resources or the CO.
- › Refer to Entegris' *Equal Employment Opportunity Policy*.

Q+A

QUESTION:

One of my coworkers sends emails containing jokes and derogatory comments about certain nationalities. They make me uncomfortable, but no one else has spoken up about them. What should I do?

ANSWER:

You should notify your immediate manager or Human Resources. Sending such jokes violates our values as well as our policies pertaining to the use of email and our standards on diversity, harassment and discrimination. You can also report the matter through the Entegris Compliance Hotline. By not "speaking up," you are condoning discrimination and tolerating beliefs that can seriously erode the team environment that we have all worked to create.

Harassment-Free Workplace

We all have the right to work in an environment that is free from intimidation, harassment and abuse. Entegris is committed to providing a workplace in which the dignity of every individual is respected.

Verbal or physical conduct by any employee that harasses another, disrupts another's work performance, or creates an intimidating, offensive, abusive or hostile work environment is prohibited.

At Entegris we do not tolerate:

- Threatening remarks, obscene phone calls, stalking or any other form of harassment.
- Causing physical injury to another.
- Intentionally damaging someone else's property or acting aggressively in a manner that causes someone else to fear injury.
- Threatening, intimidating or coercing others on or off the premises – at any time, for any purpose.

A common form of harassment is sexual harassment, which in general occurs when:

- Actions that are unwelcome are made a condition of employment or used as the basis for employment decisions such as a request for a date, a sexual favor or other similar conduct of a sexual nature.
- An intimidating, offensive, or hostile work environment is created by unwelcome sexual advances, insulting jokes, or other offensive verbal or physical behavior of a sexual nature.

MAKE SURE YOU:

- › Help each other by speaking out when a coworker's conduct makes others uncomfortable.
- › Never tolerate sexual harassment including requests for sexual favors, or other unwelcome verbal or physical conduct of a sexual nature.
- › Demonstrate professionalism. Do not visit inappropriate internet sites while at work or display sexually explicit or offensive pictures.
- › Promote a positive attitude toward policies designed to build a safe, ethical and professional workplace.
- › Report all incidents of harassment and intimidation that may compromise our ability to work together and be productive.

Q+A

QUESTION:

While on a business trip, a colleague of mine repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. I asked him to stop, but he wouldn't. We weren't in the office and it was 'after hours' so I wasn't sure what I should do. Is it harassment?

ANSWER:

Yes it is. This type of conduct is not tolerated, not only during working hours but in all work-related situations including business trips. Tell your colleague such actions are inappropriate and must be stopped, and if they continue you need to report the problem.

WATCH OUT FOR:

- › Unwelcome remarks, gestures or physical contact.
- › The display of sexually explicit or offensive pictures or other materials.
- › Sexual or offensive jokes or comments (explicit or by innuendo) and leering.
- › Verbal abuse, threats or taunting.

TO LEARN MORE:

- › Discuss any questions or concerns about our workplace harassment with Human Resources or the CO.
- › Refer to Entegris' *Unlawful Harassment Policy*.



Safe and Healthy Work Environment

Entegris will conduct its business so that our worldwide operations and products do not harm the environment or endanger the health and safety of our employees, customers or the public. We provide our employees and the public with information regarding the safety, health and environmental effects of our products and workplace chemicals and information on how to handle and use these materials safely. We shall conduct periodic reviews of our products and operations to monitor legal compliance.

Because Entegris handles and processes many different and potentially hazardous materials, a robust environmental, health and safety (EH&S) compliance structure exists to comply

with the many regulations impacting this important field. Additionally, each of us plays an important role in ensuring Entegris meets these demanding requirements. How can you help? Be proactive and speak up if you hear of or see something that you suspect might not be in line with our obligations or policies. The more we communicate, the better we can respond to any unsafe or unhealthy working conditions.

Situations that may pose a health, safety or environmental hazard must be reported immediately. We can only achieve our goal of a safe and healthy workplace through the active participation and support of everyone.

Q+A

QUESTION:

I've noticed some practices that we do in my area that don't seem safe. Who can I speak to?

I'm new here, and don't want to be considered a troublemaker.

ANSWER:

Discuss your concerns with your manager or a member of the EH&S department. There may be very good reasons for the practices, but it's important to remember that raising a concern about safety does not cause trouble, it is being responsible.

QUESTION:

Are subcontractors expected to follow the same health, safety and security policies and procedures as employees?

ANSWER:

Absolutely. Entegris employees are responsible for ensuring that subcontractors and vendors at work on Entegris premises understand and comply with all applicable laws and regulations governing the particular facility, as well as with additional requirements the Company may impose.



MAKE SURE YOU:

- › Observe the safety and security rules and practices that apply to your job.
- › Always display and swipe your personal identification badge when entering and exiting secure areas and do not allow others to enter without properly swiping their personal identification badges.
- › Respect the environmental rights and interests of our neighbors and the communities in which we operate.
- › Report all concerns to the company's dedicated EH&S professionals or the CO.

Alcohol and Drug-use Policy

- Our position here is clear. While at work or on Entegris business, you should never be impaired, and always ready to carry out your work duties.
- While conducting Entegris business, do not use, possess or be under the influence of illegal drugs or any substance that could interfere with a safe and effective work environment or harm the Company's reputation.

WATCH OUT FOR:

- › Unsafe practices or work conditions.
- › Lax enforcement of security standards, such as facility entry procedures and password protocols.

TO LEARN MORE:

- › Discuss any questions or concerns about environmental, health and safety with a member of the EH&S department or the CO.

Protecting Entegris Assets and Confidential Information

Entegris' assets include both tangible property such as equipment, products and money and intangible intellectual property such as ideas, patents and trade secrets as well as business opportunities of which we may become aware. Protection of these assets against loss, theft and misuse is critical. Every employee is responsible for protecting the assets entrusted to him or her, as well as for helping to protect Entegris' assets in general. This responsibility covers not only an employee's own conduct but also his or her attention to Entegris' security procedures and alertness to situations or incidents that could lead to the loss, theft or misuse of Entegris assets. The Company reserves the right to monitor use of Company property (including computers, email and phones) in accordance with applicable law.

MAKE SURE YOU:

- › Treat Entegris assets the way you would take care of your own property.
- › Personal use of Company assets is permitted in limited circumstances. Such use should be kept to a minimum and have no adverse effect on productivity and the work environment.
- › Do not use Entegris equipment or information systems to create, store or send content that others might find offensive.
- › Respect the copyrights, trademarks and license agreements of others when dealing with printed or electronic materials, software or other media content.



WATCH OUT FOR:

- › Requests to borrow or use Entegris equipment without approval.
- › Lax enforcement of electronic access control cards.
- › Sharing passwords.

TO LEARN MORE:

- › Discuss any questions or concerns about protecting Entegris assets with the IT department or the Compliance Officer.
- › Refer to Entegris' *IT Security Policy*.

Confidential Information

Each of us must be vigilant and protect Entegris' confidential information. This means keeping it secure, limiting access to those who have a need to know in order to do their job and avoiding discussion of confidential information in public areas. Many of us also have access to confidential information related to our colleagues, our customers and our business partners. We must protect their confidential information. The obligation to preserve confidential information continues even after employment ends.



MAKE SURE YOU:

- › Learn about the types of information which are given heightened protection by the law and Company policy (such as personally identifiable information, like social security numbers and bank account numbers) and protect them through appropriate means (such as encryption or other types of limited access).
- › Don't access, discuss or share confidential information unless there is a legitimate business reason to do so.
- › Protect intellectual property and confidential information by sharing it only with authorized parties.
- › Obtain competitive information only through legal and ethical means, never through misrepresentation, or through any behavior that could be construed as "espionage," "spying" or which you would not be willing to fully disclose.

WATCH OUT FOR:

- › Unintentional exposure of confidential information in public settings such as on phone calls or while working on your laptop.
- › The loss of control of confidential information. When sending personal information across borders or to third parties, make sure that the transmissions are for legitimate business reasons and that they comply with local law.

TO LEARN MORE:

- › Discuss any questions or concerns about confidential information with the Law Department.

Creating and Managing our Business Records

All records, books and documents of Entegris must accurately reflect and properly describe the transactions they record. Accordingly, it is the duty of every Entegris employee to record and report information in an accurate and honest manner, in accordance with applicable accounting and other rules and policies.

Dishonest reporting both inside and outside of Entegris is not only strictly prohibited, but could lead to civil and even criminal liability for both the individual and Entegris. This duty of honest reporting includes the avoidance of reporting or organizing information in a manner that is intended to mislead or misinform those who receive it. Business partners, government officials and the public need to be able to rely on the accuracy and completeness of our disclosures and business records and accurate information is also essential within Entegris so that we can make good decisions.

If you suspect any irregularity relating to the integrity of our records, you need to report it immediately to your manager, the CO, or through the Entegris Compliance Hotline.



MAKE SURE YOU:

- › Create accounting and business records that accurately reflect the truth of the underlying event or transaction.
- › Record transactions as prescribed by our system of internal controls.
- › Write carefully and clearly in all your business communications, including emails. Write with the understanding that someday they may become public documents.
- › Sign only documents – including contracts – you have reviewed, are authorized to sign, and believe are accurate and truthful.
- › Never destroy documents in response to or in anticipation of an investigation or audit. Contact the Law Department if there is any doubt about the appropriateness of record destruction.

WATCH OUT FOR:

- › Financial entries that are not clear and complete or that hide or disguise the true nature of any transaction.
- › Undisclosed or unrecorded funds, assets or liabilities.

TO LEARN MORE:

- › Discuss any questions or concerns about our records management and disclosure processes or legal holds with a member of the Law Department.

Q+A

QUESTION:

At the end of the last quarter reporting period, my manager asked me to record additional expenses even though I had not yet received the invoices from the supplier and the work has not yet started. I agreed to do it, mostly because I didn't think it really made a difference since we were all sure that the work would be completed in the next quarter. Now I wonder if I did the right thing.

ANSWER:

No you did not. Costs must be recorded in the period in which they are incurred. The work was not started and the costs were not incurred by the date you recorded the transaction. It was therefore a misrepresentation and, depending on the circumstances, could amount to fraud.

QUESTION:

One of my coworkers, who recently joined Entegris from a competitor, has with her a customer list and price list of the competitor. She says she plans to use it to our advantage. Should I just ignore this and let her do it?

ANSWER:

No. If an employee retains competitor information it can result in legal action by the competitor. You must report this to the Law department for appropriate action.

Proper Use of Electronic Resources

Entegris' electronic resources provide many tools through which information can be shared around the globe. The efficient use of electronic resources contributes to Entegris' success. It is Entegris' policy that the company's electronic resources be used only in ways that do not violate the law or Entegris' Code of Ethics. Entegris employees must also protect Entegris electronic resources from unauthorized uses and security threats. The term "Entegris electronic resources" means all electronic devices, software, systems and networks, directly or through a third party, used to transmit, receive, process or store Entegris information or data.

Entegris allows reasonable and limited personal use of Entegris electronic resources by employees. Employee personal use must be occasional

and brief, must not unduly burden Entegris' resources and systems, must comply with all laws and Entegris policies, and must not interfere with normal business activities or the employee's ability to meet job expectations. In addition, employee personal use for outside commercial ventures, personal financial gain, political fundraising or other political purposes is prohibited.

Entegris reserves the right to monitor or access employee communications or other materials created, received, stored, transmitted or processed using Entegris' electronic resources, at any time and without notice, where there is a business reason to do so and as permitted by law. For this reason, users of Entegris' electronic resources should not have an expectation of privacy in emails, documents, files, voice files

or other communications or materials created, received, stored, transmitted or processed using Entegris' electronic resources, unless required by law.

Data Security

It is the policy of Entegris to protect its systems and data by controlling access to such systems and data through centralized information security policies and procedures. Any unauthorized access, update or use of Entegris systems or data is strictly prohibited. Furthermore, you are responsible to protect the integrity of all systems and data for which you are authorized to access or update, and you must only divulge information related to such systems or data to those having an authorized business requirement.

MAKE SURE YOU:

- › Use Entegris' electronic resources in accordance with Entegris' policies and applicable laws, including Entegris' policies and laws regarding information security, confidential information, privacy, harassment, political activities, software implementation and record retention.
- › Take appropriate measures to protect the security, confidentiality and integrity of Entegris' electronic data and information, as required under Entegris' policies and applicable laws.
- › Limit your personal use of Entegris' electronic resources. Make sure your use is occasional and brief, does not unduly burden Entegris' resources and systems, complies with all Entegris' policies, and does not interfere with normal business activities or your ability to meet job expectations.
- › Be aware that Entegris reserves the right to access and monitor Entegris' electronic resources and employee use of those resources, as permitted by law.

WATCH OUT FOR:

- › Using electronic resources in a manner that violates any law or Entegris policy.
- › Using electronic resources in a manner inconsistent with a respectful business environment or which violates Entegris' *Harassment Policy*, for example, by sending offensive or harassing messages or downloading or viewing sexually explicit or other offensive material.
- › More than occasional, brief personal use of Entegris' electronic resources.
- › Using Entegris' electronic resources for outside commercial ventures, personal financial gain, political fund-raising or other political purposes.

Using Social Media

Be careful when writing communications that might be published online. If you participate in online forums, blogs, newsgroups, chat rooms, or bulletin boards, think carefully before you hit the 'send' button.

When using social media:

- Never comment on confidential and non-public Company information such as the Company's current or future business performance or business plans.
- Don't send emails or post confidential information or material that could be perceived as damaging to the Company's or your colleagues' reputations.
- Be fair and courteous, and avoid posting content that may be viewed as malicious, obscene, harassing, defamatory or discriminatory.

Compliance with Company Policies

It is the responsibility of each Entegris employee in the performance of his or her duties to comply with the Code of Ethics as well as with all other applicable Entegris policies and procedures currently in effect or which may be adopted in the future. We intend that the Code of Ethics will operate as a "living" set of principles to guide our conduct as new ethical issues arise or as community standards with respect to the ethical issues discussed in this Code of Ethics change. Accordingly, any ethical policies adopted in the future by Entegris' Board of Directors will become a part of the Code of Ethics.



TO LEARN MORE:

- › Direct any questions to a member of the Human Resources or IT department.

Our Responsibilities to Our Customers and Business Partners

Fair Dealing

In all business dealings we strive to give others fair and even-handed treatment whether they are a customer, supplier, competitor or other business partner. We work to be responsive to the needs of our business partners, while always remaining true to our own ethical standards. We tell the truth about our services and capabilities and we do not make promises we can't keep. We will never take unfair advantage through manipulation, concealment, abuse of privileged or confidential information, misrepresentation, fraudulent behavior, or any other unfair practice. This makes sense for business as well as ethical reasons. Honesty is integral to ethical behavior and trustworthiness is essential for good, lasting relationships.

In short, treat others as you would like to be treated.



MAKE SURE YOU:

- › Treat each customer fairly and honestly.
- › Never follow a customer's request to do something that you regard as unethical or unlawful.
- › Be responsive to customer requests and questions.
- › Promise what you can deliver and deliver on what you promise.

WATCH OUT FOR:

- › Pressures from colleagues or managers to cut corners on quality or delivery standards.
- › Temptations to tell customers what you think they want to hear rather than the truth; if a situation is unclear begin by presenting a fair and accurate picture as a basis for decision.

TO LEARN MORE

- › Discuss any questions or concerns about our products or customer service with your manager or a member of the senior leadership team.

Conflicts of Interest

A conflict of interest happens whenever you have a competing interest that may interfere with your ability to make an objective and effective decision for Entegris. Conflicts of interest may also arise if you or a family member receives improper personal benefit as a result of your position with Entegris. Each of us is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict of interest which can undermine the trust others place in us and damage our reputation.

Each employee is expected to devote the entire of his or her assigned working time to the performance of his or her designated job. The conduct of non-company economic activity during working hours is prohibited. In addition, Entegris' facilities or property shall not be used for the conduct of non-company economic activity without prior appropriate written consent. The conduct of limited activities and communications for personal or family matters during assigned working time is not considered to violate the foregoing principles so long as they are of a type and an amount that is consistent with a professional work environment.

Conflicts of interest may be actual, potential or even just a matter of perception. Since these situations are not always clear-cut, you need to fully disclose them to your manager or the Compliance Officer so that we can properly evaluate, monitor and manage them.

MAKE SURE YOU:

- › Avoid conflict-of-interest situations whenever possible.
- › Always make business decisions in the best interest of Entegris. Disclose any relationship, outside activity or financial interest that may present a possible conflict of interest or the appearance of a conflict. Make your disclosures in writing to your manager as well as to the Company's Compliance Officer.
- › Think ahead and proactively address situations that may put your interests or those of a family member in potential conflict with Entegris.

WATCH OUT FOR:

Situations including the following, which are common examples of potential conflicts of interest:

- › **Corporate opportunities** – If you learn about a business opportunity because of your job, it belongs to Entegris. Entegris employees may not take for themselves, or direct to any family member or friend, opportunities that are discovered on the job.
- › **Friends and relatives** – On occasion, it is possible that you may find yourself in a situation where you are working with a close friend or relative who works for a customer, supplier, competitor, etc. Since it is impossible to anticipate all situations that may create a potential conflict, you should disclose your situation to your manager or the Compliance Officer in order to determine if any precautions need to be taken. At all times, you should avoid recommending or using your position

to influence the use of a supplier if you or a member of your immediate family would receive improper personal benefits as a result of your recommendation.

- › **Personal work** – You must never hire employees over whom you have direct supervisory responsibility for outside work that is of personal benefit to you and is unrelated to their work for Entegris.
- › **Personal investments** – You should not have substantial investment in, or obligation to, one of Entegris' customers, suppliers or competitors unless the security is publicly traded on a national exchange and there is no possibility for a conflict. "Substantial" is hard to define, but as a rule of thumb, it means that your investment should not be big enough for someone to reasonably think that you would do something at Entegris' expense to help your investment.
- › **Civic activities** – If you engage in volunteer work or participate in civic or non-profit organizations, you must always make it clear that your actions and views are personal and not those of Entegris. In addition, you must never use Entegris funds, assets or resources to support any such civic activities unless specifically authorized by the Compliance Officer.

TO LEARN MORE

- › Discuss any questions or concerns about conflicts of interest with the Compliance Officer.

Q+A

QUESTION:

I will be attending a fundraiser for a candidate for local office. Is it okay to list my position at Entegris as long as I don't use any Company funds or resources?

ANSWER:

No. You may not associate Entegris in any way with your personal political activities.

Gifts and Entertainment

No employee may receive or accept any gift of value or other personal benefit or favor from a firm that does business with or proposes to do business with Entegris. However, in the right circumstances, a modest holiday gift may be a thoughtful “thank you,” or a meal may be an appropriate setting for a business discussion which strengthens a professional relationship. However, if not handled carefully, the exchange of gifts and entertainment can look like a conflict of interest, especially if it happens frequently or if the value is large enough that someone could reasonably think it is influencing a business decision. Under no circumstances may gifts of money or financial assets (stocks, bonds etc.) be accepted.

When it comes to providing gifts and entertainment, our position is clear – we do not give or offer any gift that is intended, or that may appear to be intended, to gain an improper advantage in selling goods or services, conducting transactions or representing Entegris’ interests.

Gifts and entertainment, before you act – think

Gifts and entertainment come in all different forms: shirts, pens, dinners, tickets to sporting events, to name just a few examples. Before you accept or offer gifts or entertainment, think about the situation – does it legitimately support Entegris’ interest? Is the amount reasonable and customary? Does it conform to Entegris’ policy and guidelines? Would this embarrass you or the Company if it was on the front page of the newspaper?

MAKE SURE YOU:

- › Only provide and accept gifts and entertainment that are reasonable complements to business relationships.
- › Never accept gifts of any kind from a business partner with whom you are involved in contract negotiations.
- › Do not request or solicit personal gifts, favors, entertainment or services.
- › Accepting gifts of cash or cash equivalents (i.e., gift cards) is never allowed.
- › Understand and comply with the policies of the recipient's organization before offering or providing gifts, favors or entertainment.
- › Be careful when using agents who represent us or third parties who introduce business partners to us. Monitor them during the duration of any agreement to ensure they live up to our standards.

WATCH OUT FOR:

- › Situations that could embarrass you or the Company, including entertainment at sexually oriented establishments.
- › Business partners or customers who may have gift and entertainment standards that are stricter than ours.
- › Business partners that appear to be privately held but are actually considered government entities.
- › Third parties or agents who are thought to be valuable primarily for their personal ties rather than for the services they are to perform or who request compensation out of proportion to their services.

TO LEARN MORE:

- › Discuss any questions, concerns about gifts and entertainment with the Compliance Officer.

Q+A

QUESTION:

When I was traveling, I received a gift from a business partner that I believe was excessive. What should I do?

ANSWER:

You need to let your manager know or report it to the Compliance Officer as soon as possible. We may need to return the gift with a letter explaining our policy. If a gift is perishable or impractical to return, another option may be to distribute it to employees or donate it to charity, with a letter of explanation to the donor.

QUESTION:

During contract negotiations with a potential new supplier, the new supplier mentioned that they had a complimentary registration to a local business seminar. They are unable to attend and asked if I would like to go in their place. I had been thinking of attending the seminar anyhow, since the subject of the seminar applies to my work. There's no personal gain to me, it would be good for Entegris, and it would be a shame to waste the registration, I planned on saying 'yes.' Now I wonder if that would be the right decision.

ANSWER:

You should decline the offer. If you are involved in contract negotiations, you must never accept any gifts while the negotiation process is on-going. Accepting gifts during negotiations can give the appearance of a 'quid pro quo' and is always inappropriate.

Our Responsibilities in the Marketplace

Anti-Trust and Fair Competition

It is Entegris' policy to engage in fair competition, in compliance with antitrust and competition laws globally. Because antitrust and competition laws are not identical in every country, it is important that Entegris employees consult Entegris' Law Department whenever their business activities might be regulated by these laws. Failure to comply with these laws can lead to criminal and civil penalties for both Entegris and the employees involved.

We do not enter into agreements with competitors to engage in any anti-competitive behavior, including setting prices or dividing up customers, suppliers or markets. We will win in the marketplace through superior performance, not through anti-competitive behavior.



MAKE SURE YOU:

Consult the Law Department. Anti-trust laws are complex and compliance requirements can vary depending on the circumstance, but in general, the following types of business arrangements may raise antitrust concerns:

1. Exclusive sale or purchase arrangements.
2. Selective discounting.
3. Bundling of goods or services.
4. Restrictions on resellers.
5. Technology licensing agreements that place restrictions on the licensee or licensor.
6. Any business discussions or agreements with competitors.
7. Activities designed to gain or maintain a dominant market position.

WATCH OUT FOR:

The following red flags:

- › **Collusion** – when companies secretly communicate or agree on how they will compete. This could include agreements or exchanges of information on pricing, terms, wages or allocations of markets. Never share the Company's competitively sensitive information with a competitor of the Company.

- › **Bid-rigging** – when competitors or service providers manipulate a bidding process so that fair competition is limited. This may include comparing bids, agreeing to refrain from bidding or knowingly submitting noncompetitive bids.
- › **Tying** – when a company with market power forces customers to take products or services that they do not want or need in order to buy a product that they do need.
- › **Predatory pricing** – when a company with market power sells a product or service below cost so as to eliminate or harm a competitor, intending to recover the loss of revenue later by raising prices after the competitor has been eliminated or harmed.
- › Temptations to engage in informal conversations with competitors about competitively sensitive information. A conversation may be a breach of competition law whether it is formal or informal.
- › Use or dissemination of non-public information about competitors from new hires or candidates for employment.

TO LEARN MORE:

- › Discuss any questions or concerns about anti-trust and anti-competitive business practices with the Law Department.

Q+A

QUESTION:

I received sensitive pricing information from one of our competitors. What should I do?

ANSWER:

You should contact the Law Department without delay and before any further action is taken. It is important that from the moment we receive such information we demonstrate respect for antitrust laws and we make clear that we expect others to do the same. This requires appropriate action that can only be decided on a case-to-case basis and may include sending a letter to the competitor.

Anti-corruption and Bribery

Entegris has a global commitment to ethics and integrity. All countries prohibit the bribery of their own public officials and many also prohibit the bribery of officials of other countries. Our policy goes beyond these laws and prohibits improper payments in all of our activities, both with governments and in the private sector. Payment of bribes or kickbacks, at any time for any reason is strictly prohibited. This prohibition applies equally to any person or firm who represents the Company (such as consultants, agents, sales representatives, distributors or contractors).

It is especially important that we carefully monitor third parties acting on our behalf. We must always be sure to perform due diligence and know our business partners, and all those through whom we conduct our business. We must know who they are and what they are doing on our behalf. They must understand that they are required to operate in strict compliance with our standards and to maintain accurate records of all transactions.



MAKE SURE YOU:

- › Never give anything of value inconsistent with local laws and regulations to any governmental officials. If you are not sure what the local laws are, the safest course of action is to not give anything of value.
- › Understand the standards set forth under anti-bribery laws which apply to your role at Entegris.
- › Accurately and completely record all payments to third parties.
- › Obtain preauthorization from the CO before making a “facilitating payment”.

“Facilitating payments” are small payments demanded by low-level foreign government officials to perform routine clerical functions that the company is legally entitled to, such as inspecting goods or securing shipping permits. Under current U.S. law, these payments may be allowed.

However, it’s important that you keep in mind that such payments (even if acceptable under U.S. law) may be serious violations of other country’s laws. If you ever encounter such a situation, discuss the matter with the Compliance Officer before agreeing to make any payment, no matter how small.

WATCH OUT FOR:

- › Any payment to an individual or a bank account located in a country other than that in which the goods were delivered or the services were performed.
- › Gifts or payments to influence a government official to allow Entegris to gain or keep government business.
- › Inaccurate or incomplete invoice description of imported or exported goods and inaccurate identification of country of origin.
- › Apparent violations of anti-bribery laws by our business partners.
- › Agents who do not wish to have all terms of their engagement with Entegris clearly documented in writing.

TO LEARN MORE:

- › Discuss any questions or concerns about anti-corruption and bribery with the Law Department.

If you are ever offered or asked for a bribe

If you are offered or asked for a bribe, no matter how small, you must refuse it and clearly state Entegris' policy of never engaging in bribery or corruption. You should then immediately report the incident to the CO.

Giving or accepting any form of bribe is serious misconduct, and will be treated as a disciplinary matter.

Q+A

QUESTION:

I work with a foreign agent and I suspect that some of the money we pay him goes toward making payments or bribes to government officials. What should I do?

ANSWER:

This matter should be reported to the Law department for investigation. If there is bribery and we fail to act, both you and Entegris could be liable. While investigating these kinds of matters can be culturally difficult in some countries, any agent doing business for us should understand the necessity of these measures. It is important and appropriate to remind Entegris agents of this policy.

Global Trade

We will honor the trade and import and export control laws of all countries in which we operate. We expect all of our business partners to do the same. At times, export control laws in certain regions may conflict. To avoid problems, consult the Trade Compliance department as early as possible about local laws on exporting products, services and technology.

Many countries prohibit dealing with specifically identified countries or persons acting on their behalf, as well as transactions involving certain named narcotics traffickers and terrorists. Consult the Trade Compliance department if you have any questions or concerns.



Boycotts

A boycott is an organized effort to coerce its target to take a specific action. Boycotts are enforced by refusing to buy, sell or use the target's products and/or services. As a U.S. company, we are subject to the anti-boycott provisions of U.S. law that require U.S. firms to refuse to participate in foreign boycotts that the United States does not sanction.

Entegris and its employees will not participate in and are required to promptly report to the U.S. Government any request to join in, support or furnish information concerning a non-U.S. boycott.

MAKE SURE YOU:

- › Know your customer and the ultimate destination and end use of our products.
- › Obtain all necessary licenses before the export or re-export of products, services or technology.
- › Report complete, accurate and detailed information regarding every imported product, its places of manufacture and its full cost.

WATCH OUT FOR:

- › Transferring technical data and technology to someone in another country, such as through the Internet, email, conversations, meetings and database access. This restriction applies to sharing information with other Company associates, as well as non-associates.
- › Transporting Company assets that contain certain technology, such as a computer an associate takes on a business trip to another country.

TO LEARN MORE:

- › Discuss any questions or concerns about international trade with the Trade Compliance department.

Q+A

QUESTION:

My work requires regular interaction with U.S. customs officials. As part of my job, I am routinely asked to provide the U.S. Customs Service with information about our imports and exports. Do I really need to contact the Law Department prior to each and every submission of information to the government?

ANSWER:

The right approach here would be to discuss with the Law Department the types of requests your department routinely receives from U.S. Customs. These routine requests, once understood by the Law Department, could be handled without any legal review. Extraordinary requests would still require Law Department review to ensure that you are responding accurately, fully and in accordance with the law.

Our Responsibilities as Corporate Citizens

S.E.C. Compliance and Insider Trading

It is the policy of Entegris to provide full, fair, accurate, timely and understandable disclosure in reports and documents that it files with the Securities and Exchange Commission (SEC) as well as in other public communications made to the financial community. No employee shall knowingly prepare any document or report or information for incorporation into a document or report for filing with the SEC that fails to meet the standard of full, fair, accurate, timely and understandable disclosure.



“Material inside information” is information that has not been disclosed to the public and that would have been important to a reasonable investor in determining whether to buy, sell or hold stock of the company in question. Whenever an Entegris employee possesses material inside information, it is prohibited for him or her or for any person with whom he or she has shared the material inside information (commonly referred to as a “tippee”) to buy or sell Entegris shares until the information has been released to and absorbed by the investing public. This prohibition also applies to Entegris itself. Trading in these cases will result in serious civil and criminal liability for the Entegris employee (and also any tippee). Civil actions for damages may be brought by purchasers or sellers of Entegris shares and by the SEC against the particular Entegris employee, any tippee, and Entegris itself. The law permits the SEC to recover a penalty of triple damages plus attorney’s fees and allows the SEC to pay a “bounty” of up to 10% of the SEC’s recovery to any informant. This prohibition on insider trading also applies to an Entegris employee who possesses material inside information regarding another publicly traded company which the Entegris employee obtained by reason of his or her employment with Entegris. Information obtained by reason of Entegris employment would include non-public information obtained from discussions with the company’s employees, visits to the company’s facilities and other information which the Entegris employee would not have become aware of but for his or her employment with Entegris.

MAKE SURE YOU:

- › Do not buy or sell securities of any other company when you have material nonpublic information about that company.
- › Do not communicate such material nonpublic information to other people.

WATCH OUT FOR:

- › Requests by friends or family for information about companies that we do business with or have confidential information about. Even casual conversations could be viewed as illegal “tipping” of inside information.
- › **Tipping** – You need to be very careful when you have this type of information to make sure you do not share it with anyone, either on purpose or by accident; tipping of inside information is against the law regardless of whether you benefit from the outcome of trading using the information.

TO LEARN MORE:

- › Discuss any questions, concerns about insider trading with the Compliance Officer.
- › Refer to Entegris’ *Prohibition on Insider Trading* policy and procedures.

A dark blue speech bubble containing the text 'Q+A' in white.

QUESTION:

I'm not sure what kind of information is covered by the term 'material information.' What does it include?

ANSWER:

'Material information' includes any information that a reasonable investor would consider important when deciding whether to buy, sell or hold a security. This can include news about acquisitions, financial results, important management changes, as well as news about the financial performance of a company. If you're in doubt about whether certain information is material or has been released to the public, don't trade until you have consulted with the Compliance Officer.

Respect for Third Party Intellectual Property

Intellectual Property rights are crucial to protecting investments that companies make in developing new products, processes and ideas. Just as Entegris is vigilant to protect our intellectual property rights, we must correspondingly respect the intellectual property rights of others. Most computer software and literature is protected by a copyright. This means that it is illegal to make copies except for backup and security purposes. Unauthorized use of the intellectual property rights of others may expose the Company to civil law suits and damages and is prohibited. In many countries, theft and misappropriation of trade secrets, proprietary information, or other intellectual property may result in significant fines and criminal penalties to both Entegris and to the employees involved.

Our Commitment to Human Rights

We are committed to comply with applicable labor and employment laws everywhere we operate. We will comply with all applicable laws relating to responsible sourcing of materials that we incorporate into or use to make our products.

No Political Contributions

In the United States, no contributions or donations of the funds, assets, services or other resources of Entegris or any Entegris subsidiary are permitted, either directly or indirectly, for any political cause, party or candidate. Outside of the United States no such contributions or donations are permitted, even if lawful in the country in question, unless appropriate written consent is obtained from Entegris' Compliance Officer.

Code of Business Ethics

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