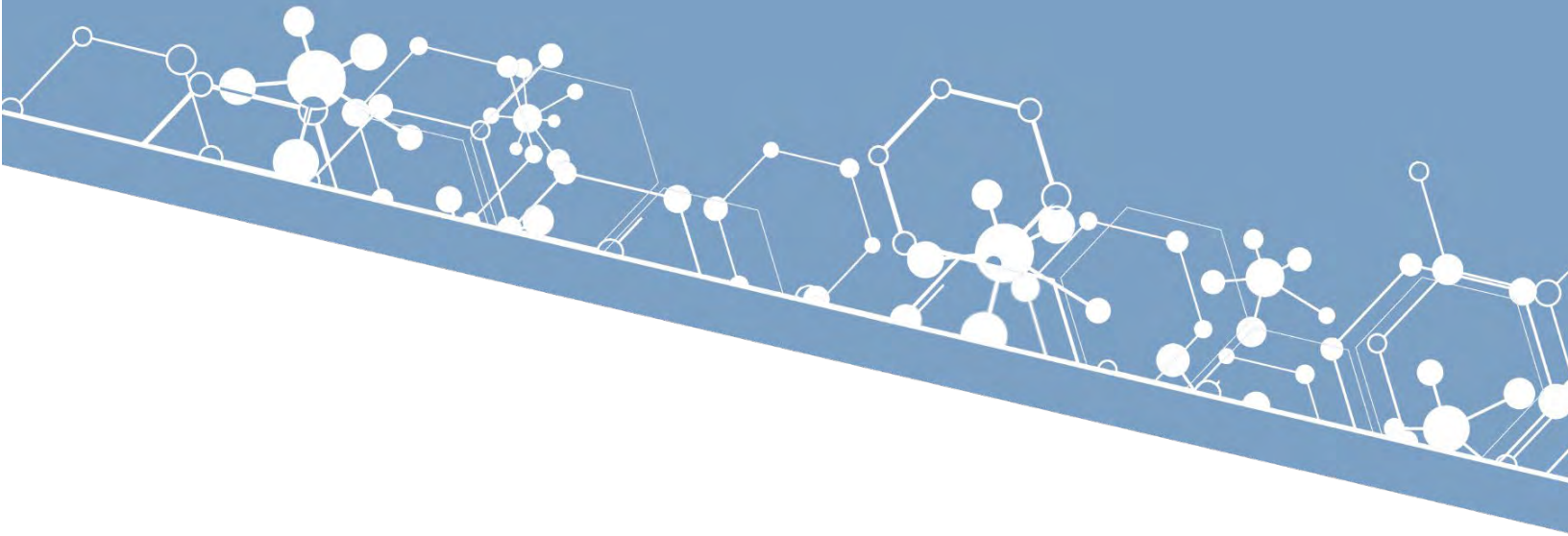


Supplier Code of Conduct





This Supplier Code of Conduct provides standards and guidelines of conduct for all suppliers doing business with any MKS company worldwide. MKS' reputation is built on honesty, integrity, quality, and trust. We therefore require our supply chain partners to conduct themselves in the same manner, regardless of local business practices or social customs. The Supplier Code of Conduct sets out the minimum standard of business behavior required so that suppliers act in ways that are ethical, corporately responsible, and aims to ensure compliance with applicable laws and regulations.

MKS has adopted the industry standard Responsible Business Alliance Code of Conduct (the “RBA Code”) as our Supplier Code of Conduct. The RBA Code can be found here: <https://www.responsiblebusiness.org/code-of-conduct/>

The following pages provide some highlights of our expectations, as reflected in greater detail in the RBA Code.

LABOR & HUMAN RIGHTS



At MKS we expect our suppliers to uphold the human rights of workers, and treat them with dignity and respect, and to adhere to the RBA Code's Labor and Human Rights standards.

Slave Labor & Human Trafficking

MKS does not tolerate forced or slave labor, or any form of human trafficking. Any person employed or engaged by our suppliers must have voluntarily chosen to do so. Any type of slave, forced, bonded or prison labor is prohibited. Workers must not be in any way restricted in their personal freedom of movement.

Child Labor & Young Workers

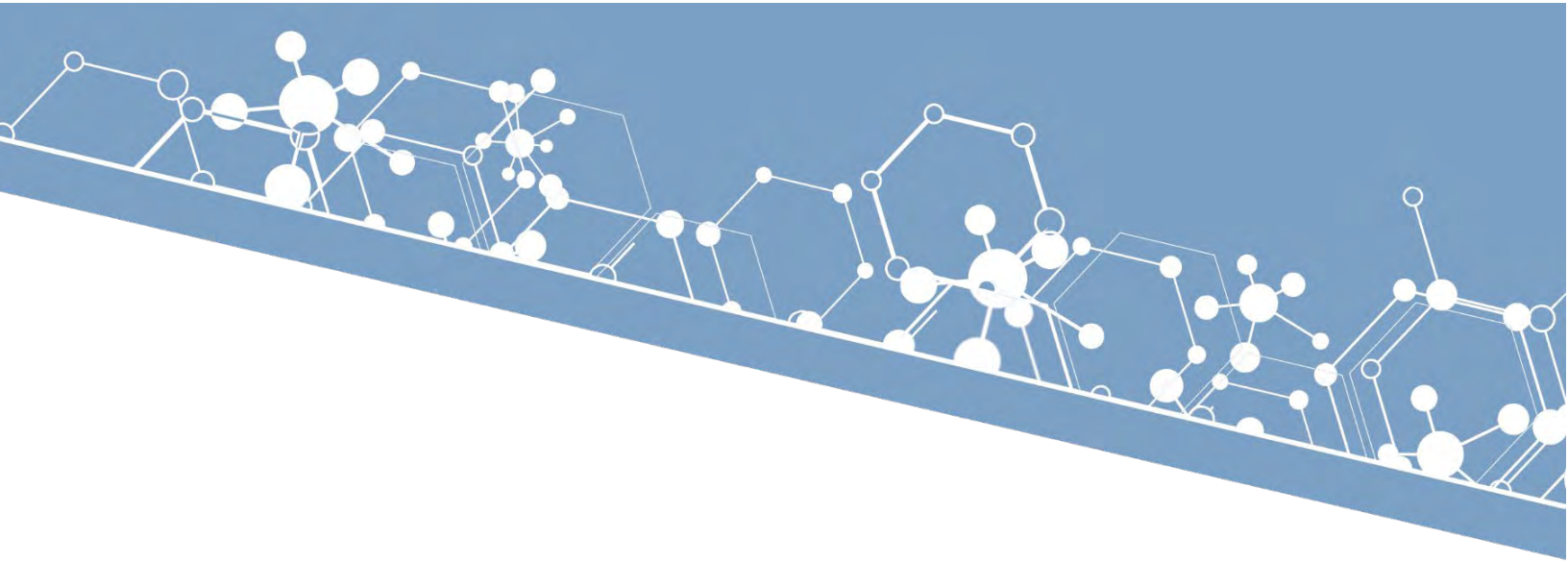
Child labor is not to be used in any stage of manufacturing. We expect our suppliers to comply with applicable laws and that they will not employ children:

- below 15 years of age or
- below the minimum age of employment permitted by the law of the country or the age of the end of compulsory schooling in that country, whichever is higher,

Workers under 18 years of age shall not perform work that, by its nature or the circumstances in which it is carried out, is likely to harm the health or safety of such persons.

Wages & Working Hours

Working time for our suppliers' workers shall not exceed the maximum set by the applicable national law and by ILO standards. A workweek must not be more than 60 hours per week, including overtime, except in emergency or unusual situations.



Compensation being paid to our suppliers' workers shall comply with all applicable laws, including those relating to minimum wages, overtime hours and pay, and legally mandated benefits. Deductions from basic wages shall not be permitted as a disciplinary measure. Workers must be given full information on the composition of their remuneration in a clear and understandable manner.

Humane Treatment & Non-Discrimination

We expect our suppliers to prevent and prohibit hard or inhumane treatment of their workers, including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming or verbal abuse of workers. Our suppliers shall not engage in discrimination or harassment in hiring and employment practices. In conformance with local law, we expect our suppliers to respect the rights of workers to join trade unions, bargain collectively, and engage in peaceful assembly.



HEALTH & SAFETY

We recognize that a safe and healthy work environment not only minimizes the incidents of work-related incidents, but also enhances the quality of products and services. We expect our suppliers to adhere to the RBA Code's Health and Safety standards.

Occupational Safety

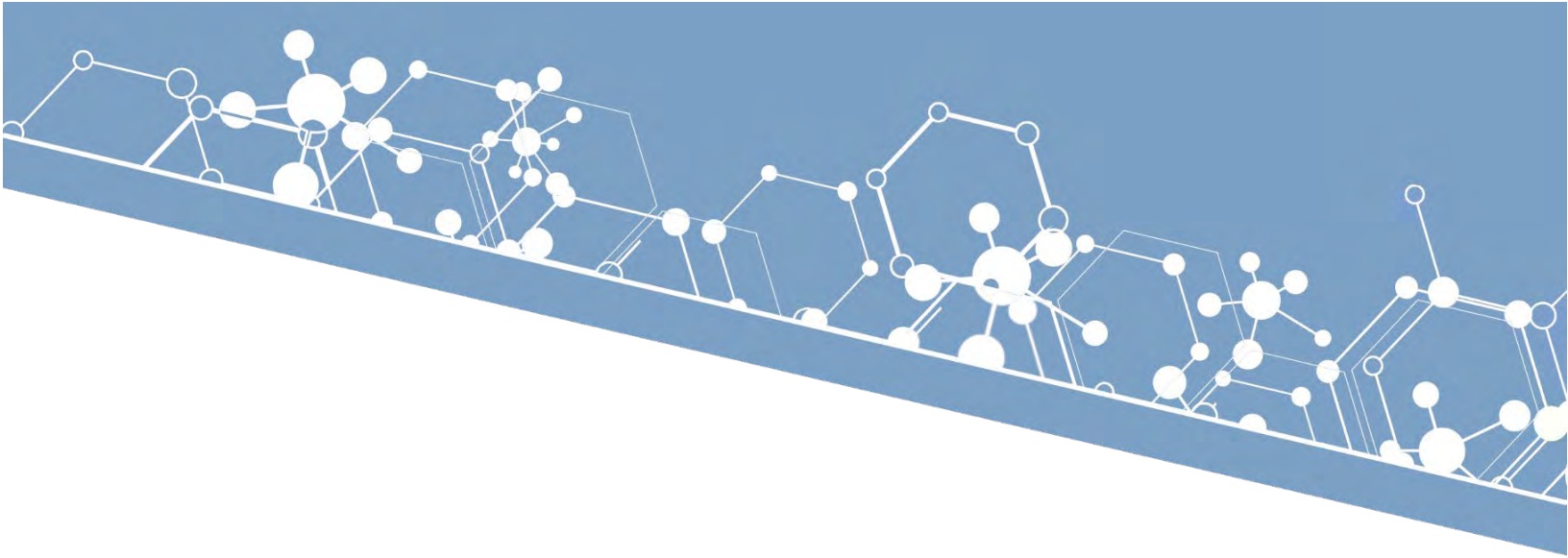
The workplace must not put the health or safety of workers at risk. To ensure such an environment, MKS expects our suppliers to:

- identify, assess, and mitigate the potential for work exposure to health and safety hazards;
- implement engineering and administrative controls, preventative maintenance, and safe work procedures, and provide safety training; and
- where necessary, provide workers with appropriate personal protective equipment to prevent risk of accidents or of adverse effects to health.

Emergency Preparedness

Suppliers shall identify and assess potential emergency situations, and minimize the possible impact of such events by implementing emergency plans and response procedures including:

- emergency reporting;
- worker notification and evacuation procedures;
- worker training and drills;
- appropriate fire detection and suppression equipment; and
- adequate exit facilities.



Prevention of Occupational Injury and Illness

Suppliers shall put in place procedures and systems to prevent, manage, track, and report occupational injury and illnesses. These systems help to encourage workers to report accidents, classify and record injury and illness cases, provide necessary medical treatment, investigate cases, and implement corrective actions to eliminate their causes.

Industrial Hygiene

Suppliers shall identify, evaluate, and control their workers' exposure to chemical, biological, and physical agents. If overexposure cannot be controlled by means of engineering or administrative controls, workers are to be protected by appropriate personal protective equipment free of charge.

Physically Demanding Work & Machine Safeguarding

Suppliers shall identify, evaluate, and control their workers' exposure to the hazards of physically demanding tasks such as manual material handling, heavy or repetitive lifting, prolonged standing, or highly repetitive or forceful assembly tasks. Suppliers shall provide physical guards, interlocks, and barriers, and evaluate production and other machinery for safety hazards.

Sanitation, Food, Housing, & Training

Suppliers shall provide workers with ready access to clear toilet facilities, potable water, and sanitary food preparation, storage, and eating facilities. Worker dormitories shall be clean and safe. Workers shall be provided workplace health and safety information and training, and shall be encouraged to raise any health and safety concerns without retaliation.



ENVIRONMENT

Suppliers shall identify their environmental impacts and minimize adverse effects on the community, environment, and natural resources within their manufacturing operations, while safeguarding the health and safety of the public. We expect our suppliers to adhere to the RBA Code's Environmental standards. These standards include:

Environmental Permits and Reporting

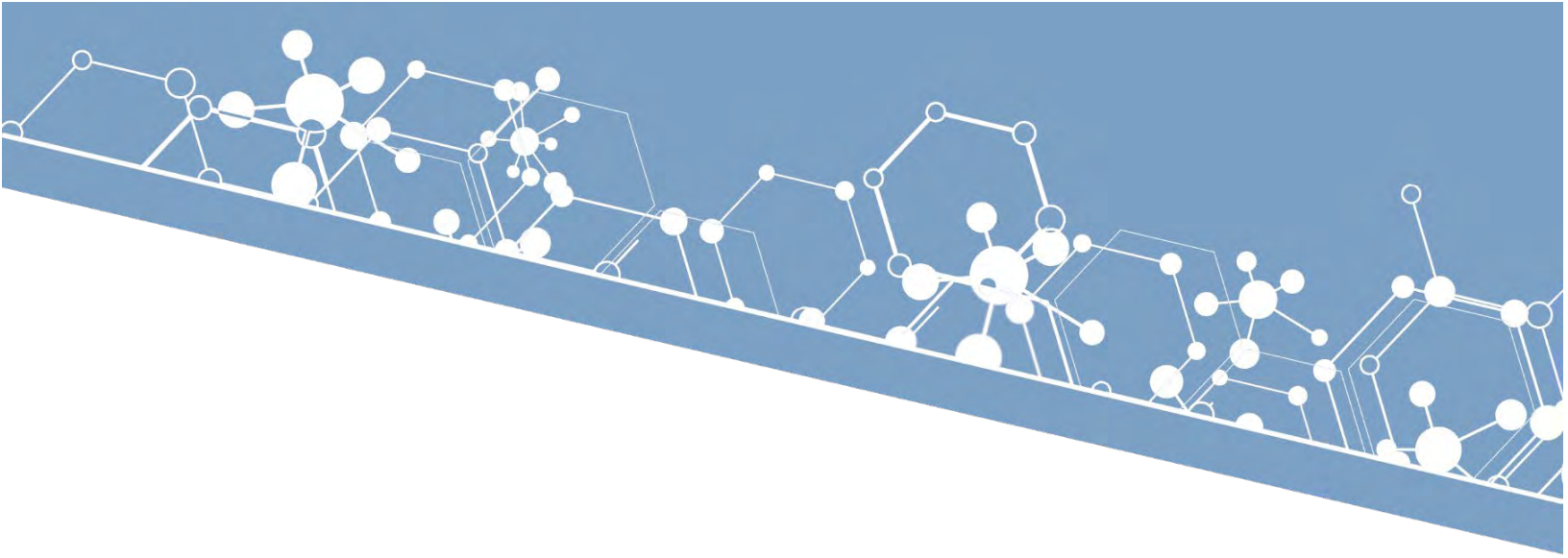
Suppliers shall obtain and keep current all required environmental permits, approvals, and registrations.

Pollution Prevention and Resources Reduction

Suppliers shall minimize or eliminate emissions and discharges of pollutants and generation of waste.

Hazardous Substances, Solid Waste, & Air Emissions

Suppliers shall identify, monitor, and control the use, handling, and disposal of chemicals, waste, and other hazardous materials. Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion by products from operations are to be monitored, controlled, and treated as required.



Materials Restrictions

Suppliers shall adhere to all applicable laws and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing.

Water Management, Energy Consumption, & Greenhouse Gas Emissions

Suppliers shall implement a water management program that documents, characterizes, and monitors water sources, use, and discharge; seeks opportunities to conserve water; and controls channels of contamination. Suppliers shall establish a corporate-wide greenhouse gas reduction goal, and track, document, and report against such goal.



ETHICS

We expect our suppliers to adhere to the RBA Code's Ethics standards.

Business Integrity & No Improper Advantage

We require a zero-tolerance policy to prohibit all forms of bribery, corruption, extortion, and embezzlement. Suppliers shall prohibit bribes or other means of obtaining improper advantage.

Disclosure of Information

Suppliers must transparently perform and accurately reflect all business dealings in their books and records.

Intellectual Property

Suppliers shall protect intellectual property rights and safeguard customer and supplier information.

Fair Business, Advertising, & Competition

Suppliers shall uphold standards of fair business, advertising, and competition.

Protection of Identity & Non-retaliation

Suppliers shall maintain programs to ensure the confidentiality, anonymity, and protection of whistleblowers, unless prohibited by law.

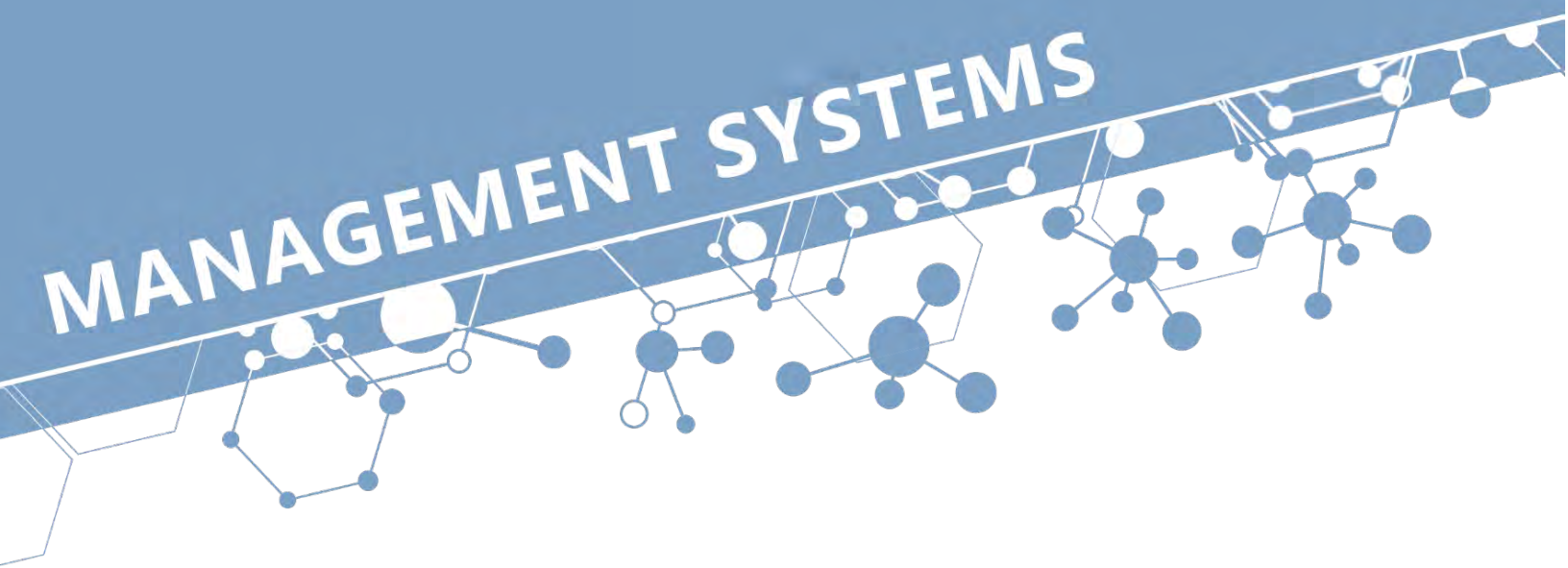
Responsible Sourcing of Minerals

Suppliers shall adopt a due diligence program to ensure that specified minerals in the products they manufacture are sourced consistent with the Organization for Economic Cooperation and Development's (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent framework.

Privacy

Suppliers shall protect the personal information of all employees, consumers, and partners, including suppliers and customers.

MANAGEMENT SYSTEMS



Suppliers shall adopt a management system to ensure compliance with applicable law and this Code, which includes:

- Supplier's commitment expressed in policy statements
- Management accountability and responsibility
- Adherence to legal and customer requirements
- Risk assessments and risk management
- Improvement objectives
- Training and Communication program
- Worker feedback, participation, and grievance
- Audits, assessments, and corrective action process
- Maintenance of documentation and records
- A process to communicate and monitor supplier compliance



REPORTING

The MKS Compliance Hotline is operated by an independent reporting service, and you may contact the hotline anytime, online, via mobile device or via phone to raise questions or concerns regarding potential violations of this Code, our policies or procedures, or the law.

You may submit a report confidentially and, if you wish, anonymously. However, please note that we may be prevented from investigating and/or addressing matters raised in reports made anonymously, if contrary to the local laws of a particular country.

- Online: mksinst.ethicspoint.com
- Mobile: mksinstmobile.ethicspoint.com
- Phone: **855-874-1532***

* Dialing instructions (including local access codes) when calling from outside the U.S. are available at mksinst.ethicspoint.com. Select your country to view dialing instructions.