



MKS PAMP
GROUP

MKS PAMP GROUP CODE OF CONDUCT

The management of MKS PAMP GROUP and its subsidiaries and affiliates (“MKS” or the “Company”) is committed to ensuring that MKS and its employees demonstrate the highest standards of ethics and integrity in all business activities.

Our business philosophy is based on the fundamental values of RESPECT and INTEGRITY in all of our business relationships and activities both within and outside the Company. We have the RESPONSIBILITY to fulfill our commitments with the highest of ethical standards.

As employees of MKS, we are each accountable for following our Code of Conduct (“Code”) and exercising good judgment consistent with it. We are also responsible for reporting Code violations that we learn about or experience. Employees who fail to comply with our Code—including those who fail to report Code violations—may face disciplinary action, up to and including termination.

Rule # 1

WE OBEY THE LAW

Obeying the law is the foundation on which our reputation and guiding principles are built. As a global organization privileged to do business all over the world, we have the responsibility to comply with all of the laws that apply to our businesses.

MKS and its employees are expected to comply at all times with all applicable laws and regulations. MKS will not condone the activities of any employee who violates the law or engages in unethical business practices, even if those activities yield results. No activity may be carried on that will not stand the closest possible public scrutiny. Accordingly, employees must ensure that their conduct cannot be interpreted as being in any way in contravention of the laws and regulations governing MKS’s operations. If you are in doubt about the application or interpretation of any legal requirement, you should refer the matter to your supervisor.



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Rule # 2

WE CONDUCT OUR BUSINESS WITH INTEGRITY

We take pride in conducting our business with integrity. We compete vigorously, but do so fairly and ethically. We do not offer or accept bribes or inappropriate gifts and we comply with the laws and regulations that support fair competition and integrity in the marketplace.

Rule # 3

WE KEEP ACCURATE AND HONEST RECORDS

Accurate and honest records are critical to making sound business decisions and maintaining the integrity of our financial reporting. Our business information, in whatever form, must reflect the true nature of our transactions.

Rule # 4

WE HONOR OUR BUSINESS OBLIGATIONS

Our business relationships are grounded in mutual trust, and have been throughout MKS's history. We build and maintain the trust and confidence of our customers and other business partners by communicating honestly, respecting information entrusted to us and standing behind our commitments.



Rule # 5

WE TREAT PEOPLE WITH DIGNITY AND RESPECT

We achieve our goals through our people. We provide a safe workplace and value the unique contributions of our global team, enabling those who support MKS's goals to achieve their own individual potential.

MKS is an equal-opportunity employer and does not discriminate on the basis of race, creed, color, ethnicity, national origin, religion, sex, sexual orientation, gender expression, age, height, weight, physical or mental ability, veteran status, military obligations, or marital status.

Rule # 6

WE PROTECT MKS's INFORMATION, ASSETS AND INTERESTS

We count on one another to act as stewards of the organization. To preserve the value of MKS, we protect the information and assets entrusted to us and avoid situations that may let personal interests influence our business judgment.

We are all entrusted with the care and use of company assets with the expectation that they will be used for the benefit of, and as directed by, MKS. Using company assets (whether physical, financial, or time) for your personal gain is a violation of this trust. You may not, therefore, obtain, use, or divert MKS property for your personal gain or benefit, or for the personal gain or benefit of anyone else.

You are responsible for the proper use and security of company property entrusted to you. You should ensure that all MKS property assigned to you is maintained in good condition. You should be able to account for such equipment at all times in accordance with established procedures. The loss of company assets should be reported immediately to your supervisor.

Information and records are important company assets. All records, whether paper or electronic formats, should be properly filed and stored in order to protect them from loss or damage, to reduce the possibility of inadvertent disclosure of confidential information, and



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to ensure ready access by others who may need to refer to them. Destruction of information, in any format, must comply with established procedures.

The handling of information is an area where MKS particularly relies on the integrity, discretion, and common sense of every employee: information is a key corporate asset. Employees who have access to confidential information—proprietary, technical, business, financial, joint-venture, customer and employee information that is not available publicly—must take every precaution to keep it confidential.

The duty of confidentiality not only prohibits the disclosure of confidential information to others, but also prohibits the use of confidential information for unauthorized purposes.

Maintaining the security of proprietary information is vital to MKS. For example, if proprietary information of even a general nature is made available to a competitor, it may give them a market advantage over MKS. Or, if a competitor gains specific business or technical information it could permit them to avoid costly research expense and development time thereby giving them a strong competitive advantage over MKS. It is your duty to maintain all confidentiality procedures to prevent any breaches of security.

Rule # 7

**WE AVOID CONFLICTS OF INTEREST OR EVEN THE
APPEARANCE OF CONFLICTS OF INTERESTS**

Avoiding Conflict of Interest

Each employee is expected to give his or her first business loyalty to MKS. Where we are entrusted with making decisions and choices for MKS it is essential that these decisions are (and are seen to be) free of any inappropriate bias arising from personal relationships or the opportunity for personal gain.

Avoiding the Appearance of Conflict of Interest

We always act in such a manner that your conduct will bear the closest scrutiny. Not only actual conflict of interest, but even the appearance of conflicts must be avoided. Perception of conflict of interest can be just as damaging as an actual conflict of interest.

Disclosure

Everyone is expected and obligated to disclose to their supervisor any circumstances that create, or might appear to create, a conflict of interest. This disclosure should be done in writing (e-mail is acceptable) and copied to Human Resources. The purpose of doing this in writing is to facilitate the tracking and cataloguing of cases so that they might be used for



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future reference and guidance and to ensure that there is no doubt that the disclosure was made. Human Resources will maintain the tracking mechanism.

Depending upon the nature of the conflict and the particular circumstances, a procedure for dealing with the conflict will be prescribed by the appropriate MKS authority and accepted in writing by the employee involved.

Prompt and full disclosure is the best way to avoid compromising situations and to reduce our risk of becoming entangled in any appearance of compromise.

The rest of this section deals with a number of circumstances where conflicts of interest may arise and where disclosure in writing should be made.

Outside Activities

Outside employment, whether for another company or for yourself, can create a perceived conflict of interest. It is strongly discouraged at every level and will be prohibited under the following circumstances:

- If it interferes in any way with the performance of your duties.
- If it is connected in any way with a company that has any business relations with the Company.
- If it is a business competitor.
- If it calls upon the primary professional skills for which you are employed at the Company and could result in a potential or perceived conflict of interest.

Directorships are dealt with on a case-by-case basis. In certain circumstances, they can benefit both the employee and MKS. In others, they can be viewed as a conflict of interest or a hindrance to one's primary duties.

If you are at all unsure as to whether your outside employment or directorship violates the above rules, you should check with your supervisor and ensure that the conclusion is documented.

MKS encourages employees to engage in volunteer community activities. However, these should be disclosed to your supervisor if they might appear to compete for your time and attention to your responsibilities.

Investments/Securities Trading

Investing: Employees do not invest in any organization that competes with or has a business relationship with MKS in any way that such investment could create a conflict of interest. This policy does not prohibit personal investments in widely traded public companies, unless the size of the investment could create the perception of a conflict of interest. Generally any investment which represents less than 1% ownership a company will not create a conflict.

Employees who trade in financial, futures, currency or commodity instruments on behalf of MKS are prohibited from trading in the same instruments on any other account.