



**CODE OF
BUSINESS
ETHICS**


Entegris

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 the 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.



Dedication 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, Chief Executive Officer, and Chair of the Board of Directors



Maintaining our good reputation depends on each and every one of us being personally responsible and accountable for our conduct.

Entegris has a long tradition of conducting its business in accordance with the highest standards of ethics and integrity, consistent with our PACE Values. Each member of the Entegris team is a custodian of this proud tradition. This Entegris Code of Business Ethics is designed to help us all uphold this tradition by providing practical guidance on common ethical issues and explaining Entegris' position on situations that may arise.

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. While today's business environment is increasingly complex and constantly changing, one thing has remained constant – our belief that maintaining our good reputation depends on each and every one of us being personally responsible and accountable for our conduct.

No code of business ethics can foresee all possible situations, so Entegris ultimately relies upon the integrity and judgment of our employees "to do the right thing." 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, our teamwork, and our commitment to ethics and compliance will not only enable us to succeed today, but will help us achieve long-term success, and that we will continue to be proud of how we earn it.

Sincerely,

A handwritten signature in black ink, appearing to read "Bertrand Loy". The signature is stylized and fluid.

Bertrand Loy
President, Chief Executive Officer,
and Chair of the Board of Directors

Message from Joseph Colella

Senior Vice President, General Counsel, Chief Compliance Officer, and Secretary



You have a responsibility to speak up.

Our PACE Values and this Entegris Code of Business Ethics help ensure that Entegris will continue to be a high-performance company with high-integrity. While the need for us all to conduct business ethically and in accordance with all applicable laws is beyond question, those precise responsibilities may not always be clear. This Code of Business Ethics is designed to help identify what is ethical and acceptable as we conduct business and interact with each other and our business partners.

Navigating increasingly complex business landscapes can present ethical dilemmas or compliance-related questions. If you are unsure of what to do or concerned that this Code of Business Ethics, our policies, or guidelines are being broken, you have a responsibility to speak up and I encourage you to do so. A problem cannot be resolved unless it has first been identified. The Law Department and our global compliance teams are ready to support you, so please reach out to us, a member of the Human Resources team, your line manager, or a member of the Executive Leadership Team. You can also ask questions or raise a concern anonymously via our ENTEGRITY hotline.

I believe that our collective commitment to our PACE Values and the principles set forth in this Code of Business Ethics makes Entegris a special place to work. The Law Department and our compliance teams are committed to supporting our global team as you deliver on this commitment.

A handwritten signature in black ink that reads "Joe Colella". The signature is written in a cursive, flowing style.

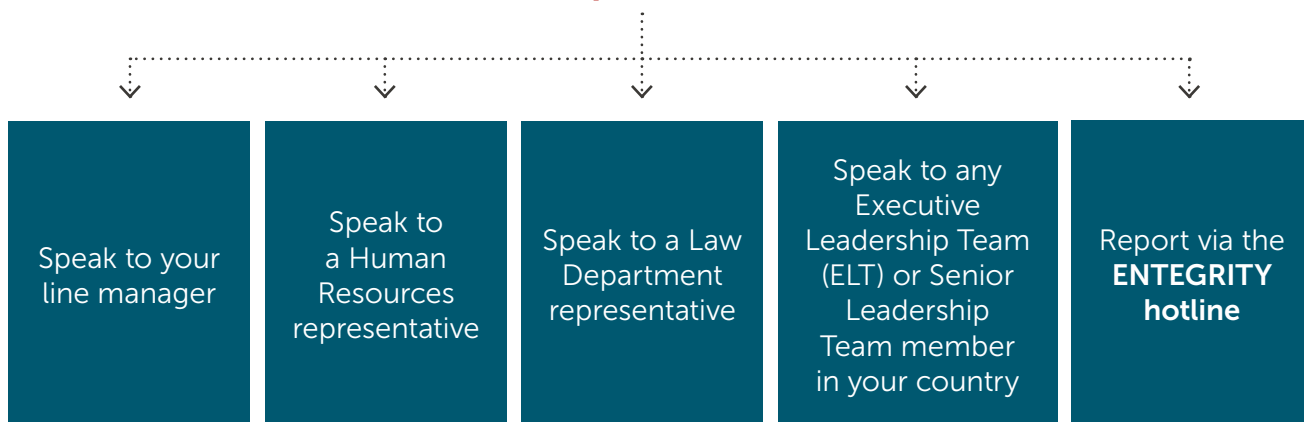
Joseph Colella

Senior Vice President, General Counsel,
Chief Compliance Officer, and Secretary





How do I report a concern?



ENTEGRITY HOTLINE

- Available 24 hours, seven days a week.
- Available in all local languages where we operate.
- Trained independent specialists will document your concerns and forward a written report to the Law Department for investigation.
- You may choose to remain anonymous.
- All reports will be taken seriously whether they are submitted anonymously or not.

Visit entegris.com/entegrity to make a report

In the U.S.: (800) 461-9330

All other locations: entegris.com/entegrity for local phone numbers

WHAT TO EXPECT WHEN YOU USE THE ETHICS AND COMPLIANCE HOTLINE

- After you make a report, you will receive an access number so you can check the status and 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 access 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.
- The Company treats all reports of ethical concerns as confidentially as possible. Management shares information only with individuals who need to be asked about the issue, or who need to know about the issue. In some cases, the Company is required to share the information with legal authorities, auditors, or others.

Speaking Up

REMEMBER: No reason, including the desire to meet business goals, should ever be an excuse for violating applicable laws or regulations, the Code, or Entegris' policies



QUESTION:

A coworker is doing something that I believe to be ethically wrong. I've brought this up to my manager before and nothing seems to be done about it. What should I do?

ANSWER:

You might want to follow up with your manager as sometimes investigations into the matter might take some time to complete. However, if you still believe that your manager is not doing anything about the issue, you should talk to another member of management, a Human Resources representative or a Law Department representative. You may also contact the ENTEGRITY hotline.

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 ENTEGRITY hotline, but I'm concerned about retaliation.

ANSWER:

It is every employee's responsibility to report any unethical behavior happening in the workplace. After you make the report, if you believe you are experiencing any retaliation, please make sure you 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.

COOPERATING WITH INVESTIGATIONS

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

All external 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.



MAKE SURE YOU:

- Always act in a professional, honest, and ethical manner when acting on behalf of Entegris.
- Take accountability and be proactive. Look for opportunities to discuss and address ethics and challenging situations with others.
- Speak up and escalate if you are aware of or suspect any unethical behavior in the workplace.
- Help create an environment where everyone feels comfortable asking questions and reporting potential violations of the Code and policies.



TO LEARN MORE:

- [Human Resources Insider Page](#)
- [Whistleblower Policy](#)



Entegris' Commitment to Ethics and Compliance

We are all expected to comply with the standards and principles in this Code of Business Ethics (“Code”) and to hold each other accountable for ensuring compliance with this Code. This Code applies to all officers, directors, and employees of Entegris and its subsidiaries worldwide. In addition, the Code 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. Certain business partners, such as agents, consultants, and vendors, serve as an extension of Entegris. They are also expected to follow the spirit of the Code, as well as any applicable contractual provisions, when working on behalf of Entegris.

Entegris’ PACE Values and Ethics and Compliance program promote our culture of accountability, integrity, and trust throughout the Company. Our Ethics and Compliance team does this through developing and implementing global programs which assess compliance risks; setting standards and policies; and monitoring, auditing, and investigating compliance-related issues. The functions supporting our commitment to ethics and compliance include the Law Department, Human Resources (HR), Internal Audit, and Environmental Health and Safety (EHS). Primary responsibility for coordination of the compliance, communication, and training activities to support the Code as well as for managing the compliance reporting, monitoring, and enforcement activities resides with the Chief Compliance Officer (CO) who is appointed by the Entegris 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 are directly responsible for assuring compliance with the substantive ethical standards of the Code of Business Ethics by employees working for the organization for which he or she is responsible. Unless another person has been designated by Entegris’ Chief Executive Officer or the Entegris Board of Directors, the Compliance Officer shall be the Senior Vice President & General Counsel.

Employees 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 his or her related contractual obligations, it may result in the termination of his or her contract with Entegris.

In the event of inconsistencies between this Code and the local law, always adopt the stricter requirement and seek guidance from the Law Department.



TO LEARN MORE:

- **Legal/Compliance:**
[Law Insider Page](#)
- **Human Resources:**
[Human Resources Insider Page](#)
- **Internal Audit:**
[Internal Audit Insider Page](#)
- **Environmental Health and Safety:**
[EHS Insider Page](#)

EVERYONE IS RESPONSIBLE FOR COMPLIANCE

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 are not alone. Your colleagues and management are available to help, and you have other resources to turn to including the Code, our policies, your colleagues, and the ENTEGRITY Hotline.

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

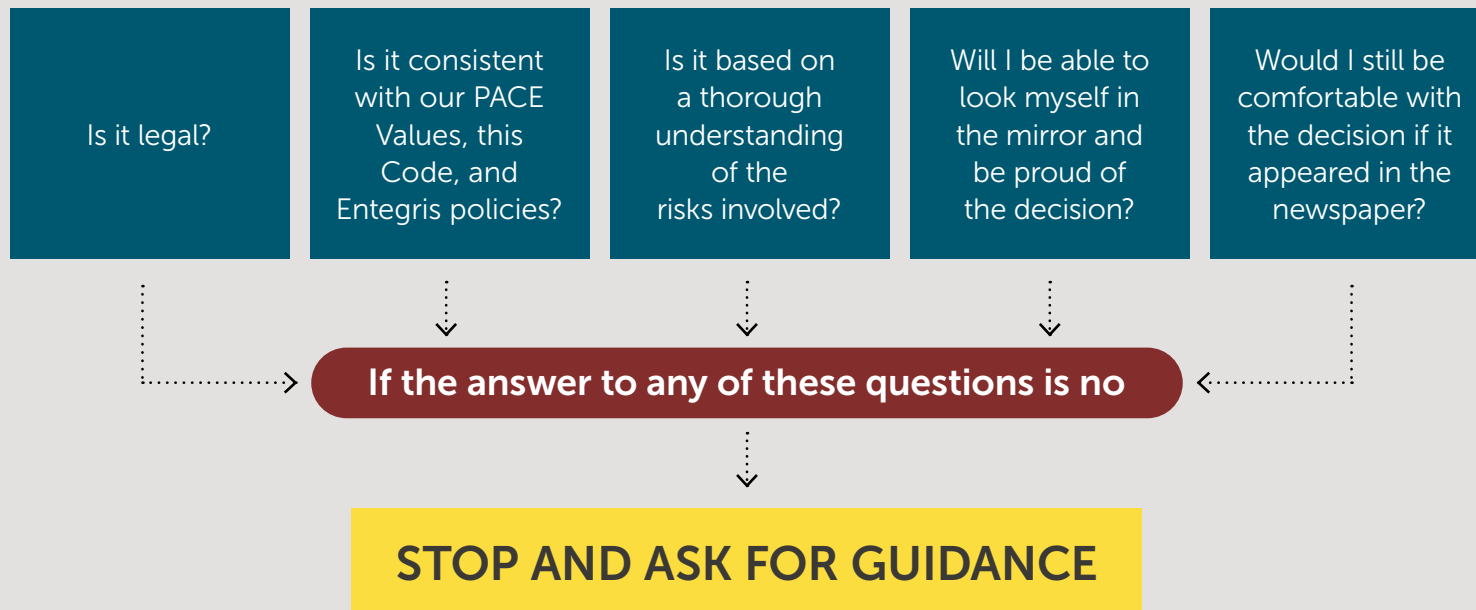




Table of Contents



People and Teamwork



Accountability, Integrity, and Trust



Creativity and Innovation



Dedication to Excellence

11 Employee Responsibilities	24 Conflicts of Interest	42 Protecting Entegris' Trade Secrets and Assets	50 Respect for Third-Party Intellectual Property
13 Speaking Up and Non-Retaliation	26 Anti-Bribery/Anti-Corruption	44 Confidential Information	51 Communications with External Parties
14 Diversity, Inclusion, and Non-Discrimination	28 Gifts and Entertainment	46 No Secret Recordings	52 Quality
16 Respectful Workplace	30 Antitrust and Fair Competition	47 Responsible Use of Artificial Intelligence (AI) Tools	53 Safe and Healthy Work Environment
18 Privacy and Confidentiality	32 Global Trade	48 Advertising and Promotion	55 Alcohol and Drug-Use
19 Social Media	33 Creating and Managing our Business Records	48 Public Presentations and Articles	56 Leaving Responsibly
20 Charitable Donations	35 Securities Laws Compliance		
21 Political Contributions	36 Insider Trading		
22 Respect for Human Rights	38 Proper Use of Electronic Records		
	39 Expense Reporting and Reimbursement		
	40 Accountability and Discipline		



People and Teamwork

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





PEOPLE AND TEAMWORK:

Employee Responsibilities

Employees must perform their duties in good faith, in the best interests of Entegris, and with care. When making decisions, employees are required to make a good faith effort to inform themselves of all material information reasonably available, to exercise good judgment, and to seek advice of the Law Department if they are uncertain about whether a decision is legal or ethical.

Employees are also required to assist their fellow employees in properly managing Entegris' business. This includes providing management and other employees with timely, accurate information that will support informed business decisions and ensure compliance with corporate policies and applicable laws and regulations.

Employees are required to disclose to management all facts of which the employee is aware that could be material to the conduct of Entegris' business and the performance of its responsibilities. These are baseline requirements we all must commit to honoring.

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 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 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 change. Accordingly, any ethical policies adopted in the future by Entegris' Chief Compliance Officer will become a part of the Code.



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

ACT

in a professional, honest and ethical manner when acting on behalf of Entegris.

KNOW

the information in the Code as well as Entegris policies and procedures, paying particular attention to the topics that pertain to your job responsibilities.

LOOK

for opportunities to discuss and address ethics and challenging situations with others. Be proactive and a resource to others.

HELP

create an environment where everyone feels comfortable asking questions and reporting potential violations of the Code and policies. Respond quickly and effectively to concerns that are brought to your attention.

SUPERVISE

third parties and ensure that they have been engaged consistent with our Business Partner Risk Management Policy and that they understand their ethics and compliance obligations.

Retaliation means taking adverse action against someone as revenge or “payback” for something they have done that is protected by law or policy.

PEOPLE AND TEAMWORK:

Speaking Up and Non-Retaliation

Entegris promotes an open work environment where you are free to respectfully express opinions in an effort to resolve issues or simply speak transparently with colleagues. You are encouraged to openly discuss any problems with your manager so that appropriate action may be identified and taken. Employees should report suspected misconduct or violations of Entegris’ policies and procedures.

As a first step, reach out to your manager or Human Resources representative. If you are not comfortable reporting an issue in this manner, you may use the 24/7 anonymous **ENTEGRITY** hotline.

NON-RETALIATION POLICY

Entegris forbids retaliation against anyone for raising a concern in good faith or cooperating in an investigation. However, anyone who knowingly makes a false accusation or knowingly gives false information may be subject to disciplinary action. If you believe you are being retaliated against, contact your manager, a Human Resources representative, or the Law Department.



QUESTION:

My manager did not agree with my proposed strategy and has threatened to document her concerns through a performance improvement plan. Have I experienced retaliation?

ANSWER:

Unless your actions were protected by law or policy, it would be unreasonable to characterize routine performance management as retaliation.

QUESTION:

My supervisor is a fan of a professional soccer team, while I am a fan of that team’s rival. I believe this is why she gave me a negative performance review. Have I experienced retaliation?

ANSWER:

No, unless the basis for the negative action was a good faith complaint regarding a concern involving a possible violation of law or policy, the negative action would not be considered retaliation.

QUESTION:

I informed my supervisor that I am suspicious as to whether a sales channel partner is complying with our Anti-Bribery/Anti-Corruption Policy, and my supervisor threatened to fire me. Have I experienced retaliation?

ANSWER:

Possibly. You should share your concerns using the methods described in this Code. The Company will not tolerate retaliation for raising good faith concerns regarding a violation of law or policy and will promptly investigate and address the matter as appropriate.

QUESTION:

A colleague asked me to do something I’m not comfortable with, and told me “don’t tell corporate.” What should I do?

ANSWER:

You should proactively speak up by reviewing with your manager, the Law Department, or via the **ENTEGRITY** hotline.



We will treat people with respect and dignity in a collaborative environment.

PEOPLE AND TEAMWORK:

Diversity, Inclusion, and Non-Discrimination

Entegris is dedicated to creating a productive work environment where everyone is treated with respect and dignity in a collaborative environment that aligns the organization, achieves high performance, and rewards team success. We comply with all applicable employment laws and regulations.

We nurture our global work environment by investing in talent development programs and improve our team members' access to ongoing technical and leadership training. As we help our team members realize their full potential, we broaden our ability to react to new challenges and solve the complex problems we face every day.

As part of this commitment, employees must timely complete all assigned trainings.

RESPECTFUL WORKPLACE

We strive to create a productive work environment that supports teamwork and trust. We treat each other and anyone we interact with while working for Entegris with respect and dignity.

ANTI-DISCRIMINATION

We are an equal opportunity employer. We make employment decisions based on qualifications and merit. We prohibit discrimination based on any unlawful consideration such as age, race, national origin, gender, religion, disability, or other "protected status."

HARASSMENT

We are all responsible for maintaining a workplace free from unlawful harassment. Employees are strictly prohibited from engaging in harassing conduct against other employees. "Harassment" includes unwelcome verbal, non-verbal, physical, or visual acts based on a person's "protected status."

Harassment can:

- Be physical or verbal,
- Take place in-person or by other means, such as email,
- Be sexual in nature, or otherwise inappropriate words or actions,
- Include jokes, kidding, or teasing



PEOPLE AND TEAMWORK:

Diversity, Inclusion, and Non-Discrimination



QUESTION:

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

ANSWER:

You should notify your line manager or a Human Resources representative. Sending such jokes and derogatory comments violates our PACE Values and this Code.

You can also report the matter through the ENTEGRITY channels. By not “speaking up,” you are condoning disrespectful, discriminatory behavior and tolerating beliefs that can seriously erode the team environment that we have all worked to create.



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:

- [HR Policies](#)

PEOPLE AND TEAMWORK:

Respectful Workplace

Types of conduct prohibited by our policies include:

- Slurs, off-color jokes, or disparaging comments about such subjects as race, gender, disability, religion, or any other protected category;
- Circulation or posting of content which demonstrates hostility towards an individual or group based upon any protected category;
- Sexual harassment; or
- Offensive physical contact such as grabbing, pinching, or intentional brushing against another person's body.

ABUSIVE BEHAVIOR

Entegris prohibits abusive behavior in the workplace. Abusive behavior is defined as repeated, unreasonable actions that intimidate, humiliate, or degrade an individual, or which create a risk to the health of an individual. Examples of abusive behavior include: offensive language, name-calling, and insults. Abusive behavior does not include legitimate performance management.

VIOLENCE AND THREATS

Entegris prohibits acts of violence or threats of violence towards individuals or Entegris. We prohibit weapons of any type in or on Entegris property at any time except by law enforcement officers acting in the line of duty or in accordance with applicable local law. If you become aware of a threat of violence or act of violence, promptly report it to local EHS, your manager or Human Resources representative.



TO LEARN MORE:

- [HR Policies](#)



AT ENTEGRIS WE DO NOT TOLERATE:

- Remarks which threaten physical harm, obscene phone calls, stalking, or any form of unlawful harassment.
- Causing physical injury to another.
- Unwelcome physical contact with others.
- Intentionally damaging someone else's property or acting aggressively in a manner that causes someone else to fear injury.
- Physically threatening or intimidating others on or off the premises – at any time, for any purpose.

PEOPLE AND TEAMWORK: Respectful Workplace



QUESTION:

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

ANSWER:

This type of conduct is unacceptable and should not be tolerated regardless of whether it happened during working hours or not. Tell your colleague such actions are inappropriate and must be stopped, and if they continue, you need to report the problem to your manager or a Human Resources representative.



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.
- 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.



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 with your line manager or HR representative
- [HR Policies](#)

Personal data is information that can directly or indirectly identify an individual, such as a name, contact information, or health-related and genetic information



PEOPLE AND TEAMWORK:

Privacy and Confidentiality

We respect the privacy and confidentiality of personal information of our customers, our people, and others with whom we do business. We protect personal and other confidential information in all forms. We collect, store, use, transmit, and dispose of personal and confidential information in a way that is transparent and promotes trust.

We gather, use, and keep personal, customer, and other confidential information only if we have a legitimate reason to do so. Access to this information is provided only as necessary. Your duty of confidentiality does not end when you leave Entegris; you must continue to respect the confidentiality of information even after departure.



QUESTION:

My job scope requires me to share personal data with third parties to meet business needs. What should I look out for?

ANSWER:

You must ensure that we have an appropriate contract to protect personal data with these third parties and they have adequate systems and policies in place to protect the personal data and will only use it to provide services to Entegris. In some jurisdictions, other requirements may apply. Seek guidance from the Law Department before providing any personal data to third parties.



MAKE SURE YOU:

- Only use approved Entegris systems and applications in your work.
- Do not inappropriately divulge confidential or personal information.
- Be cautious when discussing company matters in public spaces.
- Take care to protect physical copies of confidential and personal information.
- Promptly identify any unintended disclosure of confidential and personal information and escalate within Entegris as appropriate.



TO LEARN MORE:

- [HR Policies](#)
- [IT Security Policy](#)

PEOPLE AND TEAMWORK:

Social Media

Social media platforms such as Twitter, Facebook, and LinkedIn, brings opportunities to build conversations and communities, but also bring risks.

You must engage in social networking in a manner consistent with Entegris' policies, whether engaged in Company-related activities or personal activities that may impact the Company or its reputation. For example, only authorized employees may represent the Company on social media. In addition, employees may not engage in social media postings that are inconsistent with or violate Company policies or procedures, including our policies prohibiting unlawful harassment and confidentiality policies that prohibit the disclosure of confidential or proprietary information of Entegris or its customers. You must not comment on the Company's business, products, or services without identifying yourself as an employee and including a disclaimer that the views are personal and not the views of the Company.

**WHEN USING SOCIAL MEDIA:**

- **Do not comment on confidential and non-public Company information, such as the Company's current or future business performance or business plans.**
- **Do not send emails or post confidential information or material that could be perceived as damaging to the Company's or your colleagues' reputations.**
- **Do not post content that may be viewed as malicious, obscene, harassing, defamatory, or discriminatory.**



PEOPLE AND TEAMWORK: Charitable Donations

Entegris supports making contributions to the communities in which it does business and permits reasonable donations to charities consistent with the Code and PACE Values. However, Entegris must always take reasonable steps to verify that any such contribution is not an illegal payment to gain an improper advantage in violation of the Anti-Bribery/Anti-Corruption Policy and any applicable anti-corruption laws or regulations.

Donations and sponsorships are permitted, as long as they adhere strictly to internal procedures and any applicable laws and regulations, and cannot be used as a means to improperly influence business decisions. Entegris must be certain that donations and sponsorships are not used to promote illegal payments, and must confirm through adequate due diligence that the recipient organization does not act as a conduit to fund illegal activities in violation of this Code or of any applicable anti-corruption laws or regulations.



QUESTION:

We have some old equipment which we can no longer use. A colleague suggested we donate it to schools for technical learning. Are we allowed to do so?

ANSWER:

While this is likely acceptable, appropriate review and approval must first occur. Seek guidance and approval from the Law Department in accordance with the Charitable Donations Policy.



TO LEARN MORE:

- [Charitable Donations Policy](#)
- [Anti-Bribery/Anti-Corruption Policy](#)



PEOPLE AND TEAMWORK: Political Contributions

We encourage your participation in civic activities, for example, service on governmental bodies, work with advocacy organizations, or participation in political campaign activities. Such activities are considered personal volunteer activities and should be undertaken on your own time and in compliance with Company policies. Employees may not represent that their own political contributions (or any related opinions or affiliations) are related in any way to, or in the name of, Entegris.

No Entegris employee nor anyone acting on Entegris' behalf may make any direct or indirect political contribution or expenditure on behalf of Entegris unless authorized in writing by the Law Department.



MAKE SURE YOU:

- Look out for any solicitations of political contributions from employees in the workplace or amongst colleagues.
- Do not use your work email accounts to send campaign-related emails to employees or external parties.
- Do not host political campaign events, such as fundraisers for candidates, without the approval of the Law Department.



TO LEARN MORE:

- [Anti-Bribery/Anti-Corruption Policy](#)
- [Political Contributions Policy](#)
- [Conflict of Interest Policy](#)





PEOPLE AND TEAMWORK:

Respect for Human Rights

- We are committed to complying 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.
- Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery, or trafficking of persons is not permitted in Entegris' operations or by its suppliers. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction, or fraud for labor or services.



QUESTION:

I have been approached with an opportunity for the Company to receive discounted labor to help incarcerated individuals receive "vocational training." What should I do?

ANSWER:

You should first evaluate whether you have a business need for added labor, and partner with Human Resources to evaluate options. Prior to entering into such an arrangement, make sure that the Law Department has reviewed and approved.



WATCH OUT FOR:

- Supply chain partners with production operations in regions where the risk of use of forced or bonded labor is heightened.
- Economic arrangements which appear to be inconsistent with lawful minimum wages.



Accountability, Integrity, and Trust

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





ACCOUNTABILITY, INTEGRITY, AND TRUST:

Conflicts of Interest

A conflict of interest arises whenever an employee has a competing interest that may interfere with his or her ability to make an objective and effective decision for Entegris. This may include external obligations, such as outside jobs, if it may affect your judgment or compromise your ability to devote appropriate time and attention to your job responsibilities at Entegris.

Employees are responsible for avoiding situations that present, or create the appearance of, a potential conflict between their interests and those of Entegris, identifying such situations and proactively disclosing such situations if they do arise.

All Entegris employees are required to proactively disclose any situations that create, or appear to create, a potential or actual conflict between your personal benefit and Entegris' interests.

WHAT SHOULD YOU DO?

AVOID

DISCLOSE

ESCALATE

Each employee must 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.

In the event where you are unable to avoid such situations, you should always **disclose it** so that we can assess and take any necessary steps to mitigate the risk.

We understand that it is not always clear-cut whether there is an actual or perceived conflicts of interest. You should always make the disclosure so that this can be assessed accordingly.



Failure to disclose an actual, perceived, or potential conflict of interest may result in termination of employment and other legal consequences



ACCOUNTABILITY, INTEGRITY, AND TRUST: Conflicts of Interest



QUESTION:

A business contact has offered me the opportunity to invest in a sales channel partner Entegris already does business with. The sales channel partner is a privately held business, and I would own 10% of the business. I do not intend to favor this sales channel partner over others. Do I need to disclose and receive approval prior to making this investment?

ANSWER:

Yes. Because the investment may cause someone to reasonably believe that you might do something at Entegris' expense to aid your investment, you should disclose and receive approval from the Law Department prior to making the investment.

QUESTION:

My aunt is a part owner of a distributor that wants to work with Entegris. I do not have a financial interest in this business. Can I send business to this distributor?

ANSWER:

No. Even though you have no financial interest in this business, your family member does. As a result, a business relationship between Entegris and this distributor would create a potential or actual conflict of interest, since you may cause someone to reasonably believe that you might do something at Entegris' expense to aid your family member.

POTENTIAL CONFLICTS OF INTEREST INCLUDE:

- Having a family member who owns a supplier that Entegris is engaging, even if you do not have decision-making authority.
- Receiving a gift from a business partner or supplier who is seeking to work with Entegris.
- Having investments in Entegris' customers, suppliers or competitors.
- Hiring a family member or close friend for a job where you have direct supervisory responsibility.
- Taking advantage of Entegris' corporate opportunities for personal gain.



MAKE SURE YOU:

- Avoid situations that present, or create the appearance of, a potential or actual conflict of interest.
- Never accept or provide gifts or other items of value that might compromise or appear to compromise your ability to make objective and fair business decisions or might influence or appear to influence business relationships.
- Fully and transparently disclose any actual, potential, or reasonably perceived conflicts using the process described in the Conflicts of Interest Policy.



TO LEARN MORE:

- [Conflict of Interest Policy](#)

ACCOUNTABILITY, INTEGRITY, AND TRUST: Anti-Bribery/Anti-Corruption

Entegris prohibits all employees and all third-party intermediaries and other business partners retained by Entegris from engaging in any corrupt activity. This includes directly or indirectly (through a third-party intermediary) offering, promising, providing, or authorizing anyone to provide money or anything of value to a government official or any private individual or entity for the purpose of obtaining or retaining any improper advantage.

Entegris requires the responsible engagement of third parties, including appropriate diligence and compliance controls, via our Business Partner Risk Management Policy.



QUESTION:

A third-party business partner told me “you don’t want to know” what she had to do to get a deal done with a foreign official. What should I do?

ANSWER:

This is a red flag and you should escalate this issue to your manager or the Law Department so that appropriate actions are taken to protect the Company.

IF YOU ARE EVER OFFERED OR ASKED FOR A BRIBE

REFUSE IT



Immediately report the incident
to the Law Department.



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



ACCOUNTABILITY, INTEGRITY, AND TRUST: Anti-Bribery/Anti-Corruption



MAKE SURE YOU:

- Understand the standards and principles in our Anti-Bribery/Anti-Corruption policy which apply to your role at Entegris.
- Never give anything of value inconsistent with local laws and regulations to any government officials. If you are not sure what the local laws are, the safest course of action is to not give anything.
- Complete all necessary due diligence before the engagement of third parties.



WATCH OUT FOR:

- Any requests for gifts or payments to influence a government official to allow Entegris to gain or keep government business.
- 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.
- 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:

- [Anti-Bribery/Anti-Corruption Policy](#)
- [Business Partner Risk Management Policy](#)



ACCOUNTABILITY, INTEGRITY, AND TRUST:

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 if doing so might compromise or appear to compromise his or her ability to make objective and fair business decisions or might influence or appear to influence business relationships. Under the right circumstances, a modest festive gift may appear to 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, gift cards, 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. If you are unsure whether a gift is moderate and acceptable, you must obtain written permission from the Law Department in order to give or accept it.



QUESTION:

A potential vendor has offered to pay for me to travel to a conference and share my expertise, should I accept?

ANSWER:

Do not accept without first disclosing and obtaining approval in accordance with the Conflict of Interest Policy.



TO LEARN MORE:

- [Conflict of Interest Policy](#)
- [Anti-Bribery/Anti-Corruption Policy](#)

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?



BEFORE YOU ACT – THINK

Gifts and entertainment come in all forms: shirts, pens, dinners, and tickets to sporting events, to name just a few examples. Think carefully before you accept or offer any gifts or entertainment. If in doubt, reach out to the Law Department.

ACCOUNTABILITY, INTEGRITY, AND TRUST: Gifts and Entertainment



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.
- Never accept or give gifts of cash or cash equivalents (e.g. gift cards, gift vouchers, etc.)
- 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, and engage them only after complying with our Business Partner Risk Management Policy. 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 involving regulated content such as adult entertainment and controlled substances.
- Business partners or customers that may have their own gift and entertainment standards.
- Business partners or customers 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 or concerns about gifts and entertainment with the Law Department.
- [Anti-Bribery/Anti-Corruption Policy](#)
- [Business Partner Risk Management Policy](#)



ACCOUNTABILITY, INTEGRITY, AND TRUST:

Antitrust and Fair Competition

Entegris competes vigorously and fairly for business based on the merits of our products and services. Entegris complies with applicable antitrust and competition laws, which vary from country to country and help to promote free markets. These laws require companies to compete individually rather than join together to unfairly restrain trade. Antitrust and fair competition laws are strictly enforced. Violations may result in harsh penalties imposed on Entegris and its employees.

COMPETITORS

Entegris prohibits conduct that may violate antitrust and competition laws. Such laws restrict competing sellers from engaging in certain activities, such as price fixing, allocating markets, and group boycotts. We must not appear to agree with a competitor on limiting our competition. Except during approved discussions (like those covered by trade association rules), do not communicate with competitors on sensitive topics such as:

- Past, present, or future prices,
- Pricing policies,
- Discounts,
- Marketing strategies, or
- Expansion plans.

CUSTOMERS

Antitrust and competition law restrictions may also apply to certain agreements between competing buyers and, in certain circumstances, between seller and buyer. Entegris' actions must not give the appearance of an attempt to engage in unfair competition. Consult with the Law Department before entering into agreements to:

- Limit the individuals or firms from whom we will purchase goods or services,
- Limit a customer's right to purchase goods and services from others,
- Unfairly discriminate with respect to price, discounts, or allowances among similarly situated and competing customers, or
- Not work with a competitive product.



ACCOUNTABILITY, INTEGRITY, AND TRUST:

Antitrust and Fair Competition

TRADE ASSOCIATION ACTIVITIES

Trade association meetings and other industry gatherings serve legitimate business purposes. They also can pose risks because competitors often attend and discuss topics of mutual concern. Trade associations usually have procedures in place for sharing information. Be sure to follow such procedures when attending trade associations or related social events. Do not discuss with competitors sensitive topics such as pricing, strategy, or any trade secret information.

COMPETITIVE INFORMATION

Information about competitors is valuable. However, it must be obtained from public sources. These sources include company websites, public presentations, journal articles, investor relations materials, or advertisements. You must never seek competitive information illegally or in any improper way. Always keep confidential the information of our customers, vendors, and competitors in accordance with Entegris' confidentiality policies. Do not use customers' or competitors' employees as sources of non-public information. Do not discuss the confidential information of a former employer. No one at Entegris should ask you to give such information.

SPEAKING AND WRITING

Be careful how you speak and write. Communications that are poorly worded can be misinterpreted or may lead to adverse inferences that you intended to break the law. Examples of statements to avoid include, "We will be the dominant force in the marketplace.", "We will crush the competition." or "Customers will have no choice but to buy from us."

FAIR DEALING

We seek competitive advantage through superior performance, not through unfair or illegal business practices. We must deal fairly with our customers, vendors, competitors, and employees. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair business practice. For example, you must make truthful statements about our services and not make false statements about a competitor.



QUESTION:

A competitor's patents are expiring and I am curious about its strategy to deal with the expiration of their intellectual property rights. I am scheduled to interview a candidate from that competitor for a vacancy. May I probe the candidate for confidential information about the competitor's plans?

ANSWER:

No. You should never ask anyone to violate his or her confidentiality or other legal obligations to third parties. For guidance, contact the Law Department.



WHAT IS A BOYCOTT?

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.

ACCOUNTABILITY, INTEGRITY, AND TRUST:

Global Trade

We will honor the trade, 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 technologies. 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.

Employees whose responsibilities include global trade must understand and comply with applicable laws and other rules for exporting technologies, products, and services from one country to another. In addition to restricting the transfer of our products between countries, export rules may also restrict the following:

- Using business knowledge outside of the employee's country, such as when providing technical assistance to others.
- Transferring technical data to someone in another country, such as through the Internet, email, conversations, meetings, or database access.
- Transferring certain technologies from within the U.S. to non-U.S. persons.
- Transporting company's assets which contain certain technical information, for example, a computer or removable storage device an employee takes on a business trip to another country.

To avoid problems, employees should consult the Trade Compliance department as early as possible about local laws on exporting products, services, and technology.



TO LEARN MORE:

- [Global Trade Compliance Insider Page](#)



ACCOUNTABILITY, INTEGRITY, AND TRUST:

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. Accurate information is also essential within Entegris so that we can make good decisions.

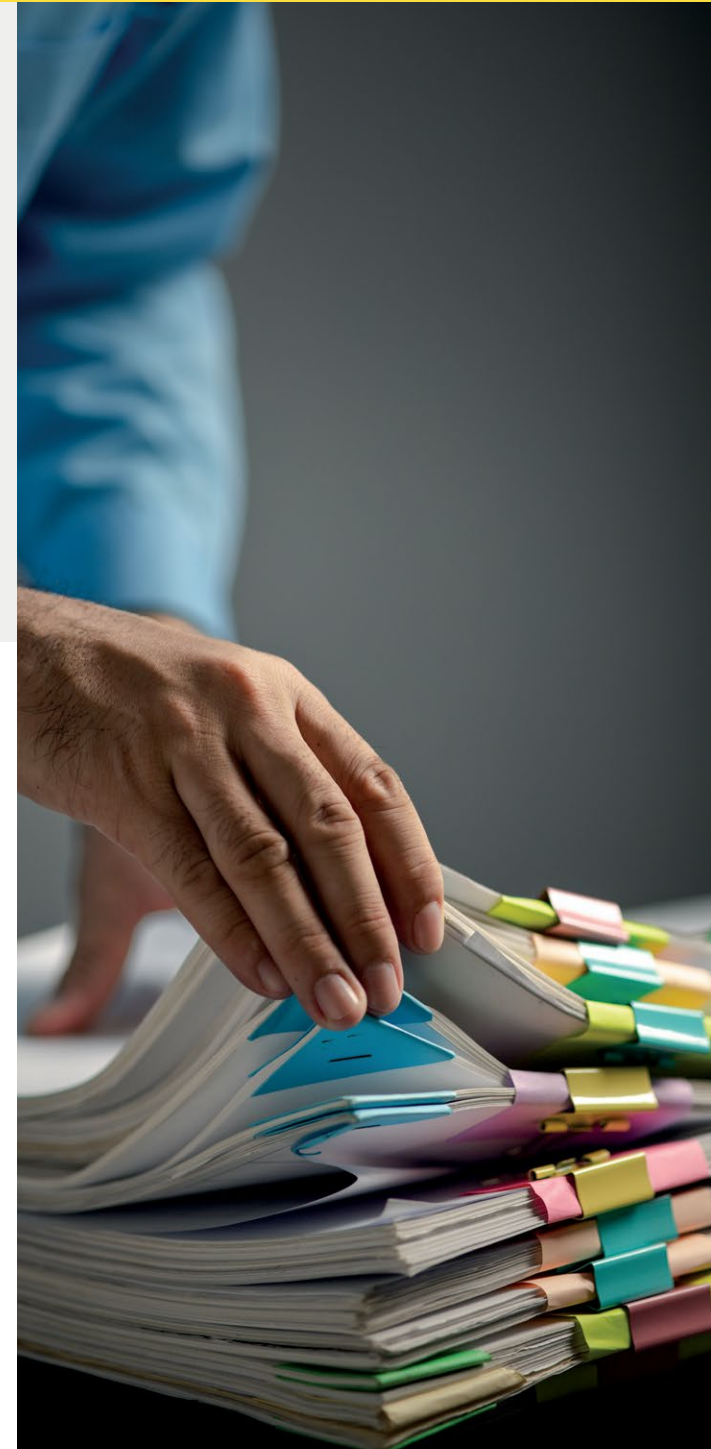
If you suspect any irregularity relating to the integrity of our records, you need to report it immediately to your manager, the Law Department, or through the ENTEGRITY Hotline.

RECORDS MANAGEMENT

A record is any type of document or data made or received, regardless of form (e.g., physical or electronic) or location, in connection with transacting official Entegris business or fulfilling its legal obligations.

Effectively managing our records allows us to meet our business needs and ensure that our records are available when needed.

It also helps us comply with applicable laws and regulations and to preserve relevant documents in the event of litigation, audits, or investigations. A "legal hold" applies to records related to anticipated litigation, regulatory action, or when we receive subpoenas. If you are notified that you are subject to a legal hold, you must retain and preserve all records that may be responsive to the legal hold until you are advised on how to proceed by the Law Department. If you become aware of a subpoena, or are threatened with legal or regulatory action, you must immediately notify the Law Department. If you believe that someone has improperly concealed, altered, or destroyed a record, you must immediately report it to the Law Department.



ACCOUNTABILITY, INTEGRITY, AND TRUST:

Creating and Managing Our Business Records



MAKE SURE YOU:

- Create business and accounting records that accurately reflect the truth of the underlying event or transaction.
- Record transactions as prescribed by our system of internal controls.
- 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:

- Any records, data, or financial entries that are not clear and complete or that hide or disguise the true nature of any transaction.
- Undisclosed or unrecorded transactions, funds, assets, or liabilities.



ACCOUNTABILITY, INTEGRITY, AND TRUST: Securities Laws Compliance



SEC DISCLOSURES

Entegris is required to provide accurate, complete and timely disclosure in reports and documents that it files with the Securities and Exchange Commission (SEC) and in all other public communications it makes. No employee shall knowingly prepare any document, report or information for incorporation into a document or report for filing with the SEC or any other public disclosure that is inaccurate or incomplete.

ACCOUNTABILITY, INTEGRITY, AND TRUST:

Insider Trading

- Employees and their family members are prohibited from trading in Company securities while in possession of material non-public information about the Company.
- Material non-public information is considered any **information that is not generally known to the public that a reasonable investor would consider important in making an investment decision regarding the purchase or sale of Company stock or other securities.**
- Examples of material non-public information could include information regarding the Company's earnings, strategic transactions (such as mergers, acquisitions, or divestitures), or any significant litigation involving the Company.
- Individuals who engage in insider trading may be subject to consequences that include, among other things, imprisonment, fines, and termination of their relationship with the Company.
- All officers, directors, and those other persons identified by the Compliance Officer are prohibited from buying, selling or otherwise effecting transactions in any stock or other securities of the Company or derivatives thereof EXCEPT during the Open Window (as defined in the Company's Insider Trading Policy).
- Even during an Open Window, all Designated Insiders (as defined in the Company's Insider Trading Policy) must obtain preclearance to make any trade in the Company's securities.
- IT IS EACH EMPLOYEE'S PERSONAL RESPONSIBILITY to comply with Securities Laws while trading in Entegris securities. If you are unsure whether any planned trading in securities is in compliance with this Policy and applicable Securities Laws, you should consult with the Compliance Officer.

WHAT IS TIPPING?

Tippling is the act of providing material non-public information about a publicly traded company or a security to a person who is not authorized to have the information with the intent to gain some sort of benefit.

Tippling is illegal, as it can unfairly produce huge profits for an investor who acts on it when performing a securities transaction.



ACCOUNTABILITY, INTEGRITY, AND TRUST: Insider Trading



QUESTION:

You have just been informed that the Company is acquiring another company, which is expected to increase the Company's share value. This news has not been announced yet, but you can't wait to share this with your family. Can you do that?

ANSWER:

No. You can only share this after the announcement of this news has been made public. Sharing of such information before it has been made public, even if casually with your family members, can be considered as illegal tipping of inside information.



MAKE SURE YOU:

- Do not buy or sell securities of any other company when you have material non-public information about that company.
- Do not communicate such material non-public 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 or concerns about insider trading with the Law Department
- [Insider Trading Policy](#)



ACCOUNTABILITY, INTEGRITY, AND TRUST:

Proper Use of Electronic Resources

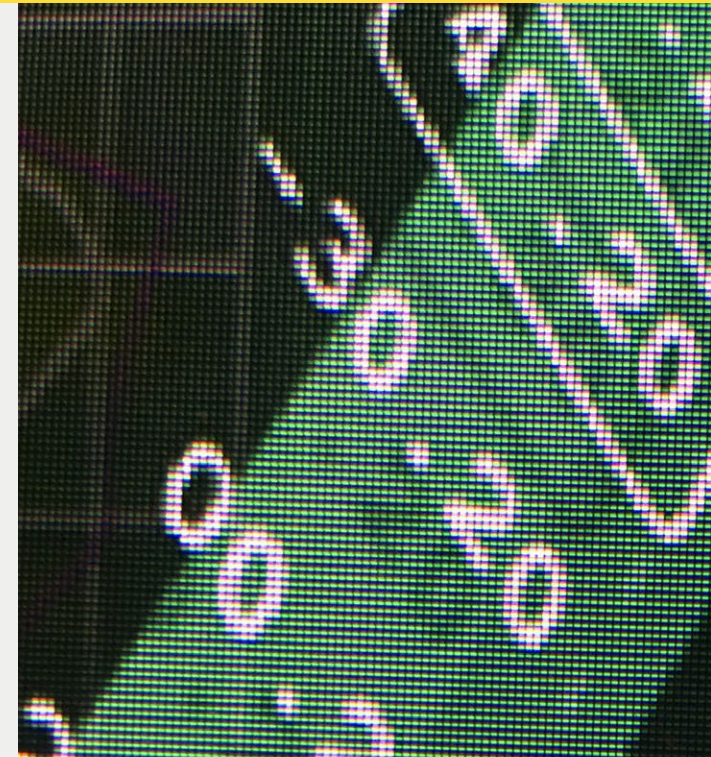
Entegris' electronic resources provide many tools through which information can be shared around the globe. The efficient use of electronic resources contributes to Entegris' success. It is Entegris' policy that the Company's electronic resources be used only in ways that do not violate the law or this Code. Entegris employees must also protect the Company's 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.

Employees' personal use of Entegris' electronic resource 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.



TO LEARN MORE:

- [IT Policies](#)



DATA SECURITY

Entegris protects its systems and data by controlling access to such systems and data through our information security policies and procedures. Any unauthorized access, update, or use of Entegris systems or data is strictly prohibited. You are responsible for protecting 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.

ACCOUNTABILITY, INTEGRITY, AND TRUST:

Expense Reporting and Reimbursement

Employees' work-related travel and entertainment should be consistent with the needs of business and follow Company policies and procedures. Expense reimbursement is not a form of compensation or a perk of employment. The principle of expense reimbursement is that an employee does not lose or gain financially as a result of business travel or entertainment.

Employees must be thoughtful and reasonable in determining whether an expense is reimbursable.

Employees are accountable for all expenses submitted and approved by them.



MAKE SURE YOU:

- Submit expenditures that are appropriate and reasonable.
- Submit expense reports on time.
- Review closely all expense reimbursement forms prior to approving them. Managers are the first line of defense against travel and expense fraud.
- Have adequate supporting documents (i.e., receipts and explanations) for your claimed expenses.
- Comply with the Anti-Bribery/Anti-Corruption Policy as well as the Global Travel and Expense Reimbursement Policy and Procedures.



TO LEARN MORE:

- [Global Travel and Expense Reimbursement Policy and Procedures](#)
- [Anti-Bribery/Anti-Corruption Policy](#)



ACCOUNTABILITY, INTEGRITY, AND TRUST:

Accountability and Discipline

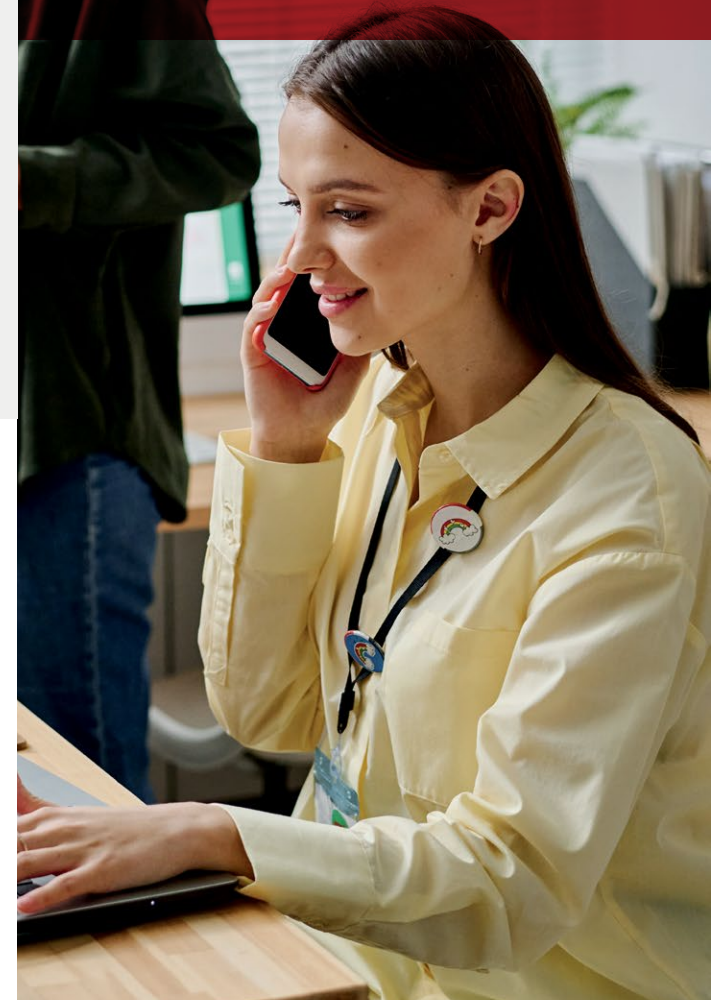
We take violations of the Code very seriously. A breach of the Code will result in disciplinary action ranging from warning and reprimand to immediate dismissal depending on the individual circumstances of each situation.

Also subject to discipline under the Code are employees who:

1. Fail to seek legal advice from Entegris' Chief Compliance Officer or their designee;
2. Act contrary to advice from the Chief Compliance Officer or their designee;
3. Fail to provide information concerning a suspected violation of law, of this Code, or of other Entegris policies;
4. Retaliate against anyone for reporting a suspected violation; or
5. Fail to timely complete trainings related to the Code or fail to timely attest to their understanding of the Code.

Further, in appropriate circumstances, Entegris will demand restitution for losses sustained and may initiate civil or even criminal legal proceedings against an offending employee. We recognize that the cost associated with pursuing such legal actions will seldom be justified on the basis of the potential recovery. The preservation of the integrity of Entegris' ethical standards is critical. Legal action will be evaluated on the basis of preserving our principles and culture, rather than the economic cost/benefit of the particular case.

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





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.





CREATIVITY AND INNOVATION:

Protecting Entegris' Trade Secrets and Assets

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.



QUESTION:

I'm not an inventor. Do I have access to trade secrets?

ANSWER:

You may have access to trade secrets even if you are not involved in R&D and are not an inventor. A wide range of proprietary information, including product designs and technical data, as well as non-technical information such as customer lists, marketing strategies, sales techniques, and other valuable non-public information may be deemed as trade secrets.

REMEMBER: Entegris' success is fueled, in part, by our valuable trade secret information.

A trade secret is generally any commercially valuable technical or even non-technical information that is not publicly known. Trade Secrets include both technical and non-technical confidential information, including all forms and types of financial, business, scientific, technical, economic, or engineering information, including patterns, plans, compilations, program devices, formulas, designs, prototypes, methods, techniques, processes, procedures, programs, or codes, whether tangible or intangible, and whether or how stored, compiled, or memorialized physically, electronically, graphically, photographically, or in writing.

Every Entegris employee is responsible for safeguarding this information.

Our know-how and trade secrets create tremendous value for our organization and help give us a competitive edge.

You must protect these valuable assets.

CREATIVITY AND INNOVATION:

Protecting Entegris' Trade Secrets and Assets



MAKE SURE YOU:

- Treat Entegris assets the way you would take care of your own property.
- Limit your personal use of Company assets. Such use should be kept to a minimum and have no adverse effect on productivity and the work environment.
- 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.
- Passwords sharing.
- Sending Entegris' confidential information to your personal email address or transmitting it to a device owned by you, rather than Entegris, jeopardizes the security of the confidential information and is inconsistent with your obligations under this Code to protect Entegris' confidential information.



TO LEARN MORE:

- Discuss any questions or concerns about protecting Entegris assets with the Cybersecurity Team or the Law Department.
- [Technology Acceptable Use Policy](#)
- [Intellectual Property and Information Security Policy](#)

CREATIVITY AND INNOVATION:

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.

CONFIDENTIAL INFORMATION

Examples of "**Confidential Information**" include, but are not limited to, all the Company's information whether written or oral, tangible or intangible:

- Which are of a private, secret, proprietary, or confidential nature;
- Concerning the Company, its businesses, operations, finances, employees, and technology, including, without limitation, any data, compositions, customer lists, equipment, formulae, know-how, method of manufacture, materials, process, records, specifications, supplier names, test methodologies, technology, pricing information, business plans and strategies, marketing information, the terms or structures of Company's contracts and agreements with customers and suppliers, trade secrets; and
- All other information which is not generally known to those outside the Company.

CONFIDENTIAL MATERIALS

Examples of "**Confidential Materials**" include, but are not limited to:

- All Company files, images, lab notebooks, letters, memoranda, reports, cloud storage, electronic/digital storage media, data, models, prototypes, drawings, photographs;
- All other tangible materials that contain Company's proprietary or Confidential Information, whether created by the Company, employee, or any other person; and
- All copies, excerpts, and summaries thereof which come into the custody, control, or possession of the employee, or is accessible by the employee.



CREATIVITY AND INNOVATION: Confidential Information



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.



CREATIVITY AND INNOVATION: No Secret Recordings

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. Those ideas may in turn become valuable trade secrets.

To protect Entegris' trade secret information, employees may not record telephone, videoconference, or in person conversations they have with their co-workers, managers or third parties unless such recordings are approved in advance by all participants, required by the needs of the business, and fully comply with local law (for example, in certain jurisdictions, it is a crime to secretly record conversations) and any applicable company policy.



QUESTION:

I find it easier to take audio recordings of my meetings with colleagues instead of taking notes but I am afraid to ask permission and prefer to use my smart phone to make private recordings. Am I allowed to do so?

ANSWER:

The Company supports recordings only when they are done transparently, with the consent of all those who are recorded, and without violating applicable law.

CAN I RECORD MY MEETINGS WITH COLLEAGUES?



We recognize the increasing importance of artificial intelligence.

At Entegris, we responsibly embrace cutting-edge technologies.

Artificial intelligence



CREATIVITY AND INNOVATION:

Responsible Use of Artificial Intelligence (AI) Tools

- You must never disclose any of Entegris' confidential information or trade secrets to third-party artificial intelligence tools (including, but not limited to ChatGPT) unless you have been authorized in writing to do so by the Law Department.
- You must not present work product produced by a third-party AI tool as your own work to internal or external audiences.



QUESTION:

I am under time pressure and believe a third-party AI tool could help me meet my deliverable timeline. In order to get usable feedback from the AI tool, I need to include Entegris' confidential information. How should I proceed?

ANSWER:

You must never disclose Entegris' confidential information or trade secrets to third-party AI tools unless you have been authorized to do so by the Law Department.



MAKE SURE YOU:

- Strive to use fair, inclusive, and unbiased AI systems.
- Only use AI systems that are lawful, safe, secure, and subject to appropriate human oversight.



WATCH OUT FOR:

- Never compromise Entegris' Confidential Information or Trade Secrets by improperly disclosing them to third-party AI tools.

DEDICATION TO EXCELLENCE:

Advertising and Promotion

We must describe our products and services accurately. All advertising and promotional claims and marketing materials in any format must receive all necessary approvals. All employees must use the Company's existing brands, trademarks, and service marks in accordance with our brand standards.

DEDICATION TO EXCELLENCE:

Public Presentations and Articles

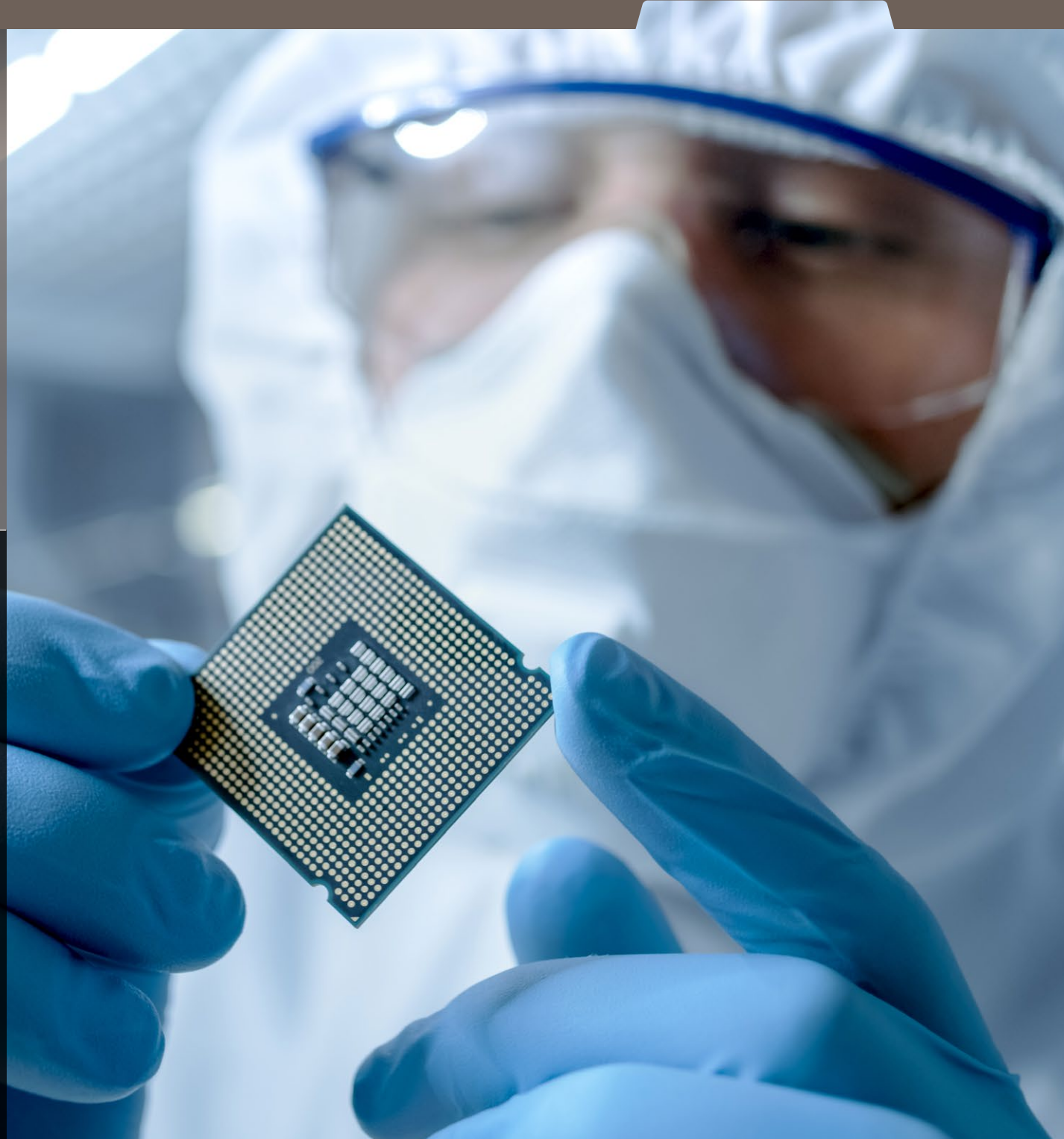
Entegris employees often have opportunities to give public presentations or publish articles on their work or areas of expertise. Your presentations and articles should never disclose Company or customer proprietary information. Prior to use or publication, all such articles or presentations must receive all appropriate approvals consistent with Company policies before releasing.





Dedication to Excellence

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



DEDICATION TO EXCELLENCE:

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 lawsuits 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.

**TO LEARN MORE:**

- [Confidential Information Policy](#)
- [Intellectual Property Insider Page](#)

DEDICATION TO EXCELLENCE:

Communications with External Parties

As an overriding principle, no employee should communicate externally about Entegris' business, performance and policies, or disclose material non-public information, without appropriate authority from the Law Department, Corporate Communications or Investor Relations. For example, employees must not make sales or profits forecasts, nor predict product launch dates or communicate information which is not already public (unless they have prior approval from the Law Department, Corporate Communications, or Investor Relations). Only approved employees may communicate on behalf of the company with journalists, research analysts, government or law enforcement officials, or other outside parties. Unless an employee has prior approval to communicate with these outside parties, the employee should refer any inquiries from government or law enforcement officials to the Law Department. Other external parties should be referred to the Law Department and Corporate Communications.

**QUESTION:**

A member of the media emailed me requesting comment on recent news about the Company. How should I respond?

ANSWER:

Unless you have been authorized to speak on behalf of Entegris, you should direct the member of the media to Corporate Communications or the Law Department.

QUESTION:

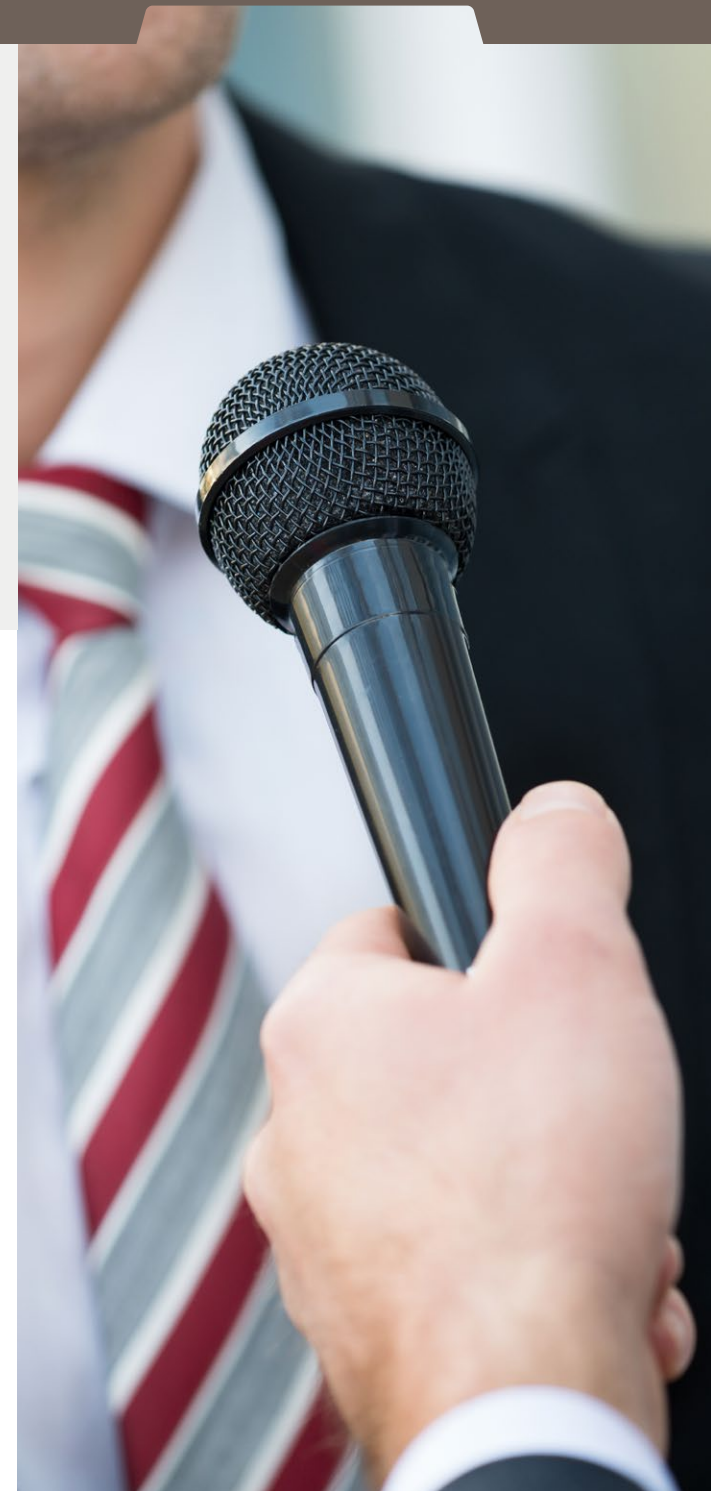
A market researcher contacted me and offered \$100 USD if I meet with them for 30 minutes to answer their questions regarding Entegris' applications. Should I participate?

ANSWER:

You should not participate without first receiving the written approval of the Law Department.

**TO LEARN MORE:**

- Discuss any questions or concerns about communications with external parties with the Law Department.



We owe our customers and each other nothing less than our best.



DEDICATION TO EXCELLENCE: Quality

Entegris pursues global excellence to enable tomorrow's breakthrough technologies.

We continuously drive to:

- Exceed customers' and applicable parties' requirements and expectations.
- Improve the quality of our products, processes, and quality management systems.
- Provide innovative products, services, and technologies.
- Review our performance against established goals and objectives.

We are committed to the development of advanced technologies and to delivery of the highest quality products that support the growth and success of our customers.



TO LEARN MORE:

- [Quality Policy](#)
- [Quality Insider Page](#)



QUESTION:

You observe some intermittent and unusual spots on the membrane during a visual inspection following membrane manufacturing. The material has passed the technical specifications and you know that the team has been working through a backlog of orders for this material. What should you do?

ANSWER:

Any observations of issues outside of the norm, even if the material has passed the technical specifications, should be escalated. We all have a responsibility to ensure that discrepant or questionable products do not ship to our customers. Quality escapes have the potential to quickly degrade trust with our customers.



DEDICATION TO EXCELLENCE:

Safe and Healthy Work Environment

Entegris will conduct its business so that our worldwide operations and products are performed in an environmentally sustainable manner and in a manner that does not 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 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 (EHS) compliance structure exists to comply with the many regulations impacting this important field.

HOW CAN YOU HELP?

Each of us plays an important role in ensuring Entegris meets these demanding requirements. 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.**

We are committed to a violence-free work environment, and we will not tolerate any level of violence or the threat of violence in the workplace, at a company-sponsored event, or while on Entegris business. Under no circumstances should anyone bring a weapon to work. If you become aware of a violation of this policy, you should report it to Human Resources or the Law Department immediately. In case of potential violence, contact your local EHS Department.



DEDICATION TO EXCELLENCE:

Safe and Healthy Work Environment



QUESTION:

I've noticed some practices 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 EHS 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 EHS professionals, Law Department or ENTEGRITY hotline.



WATCH OUT FOR:

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



TO LEARN MORE:

- Discuss any questions or concerns about environmental, health, and safety compliance with a member of the EHS department, Law Department or ENTEGRITY hotline.
- [Environmental, Health, and Safety Insider Page](#)



DEDICATION TO EXCELLENCE:

Alcohol and Drug-Use

- Our position is clear. While at work or on Entegris business, you should never be impaired, and you should always be ready to carry out your work duties, as doing so is unsafe and disrespectful to others on your team.
- 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.
- Consumption of drugs or alcohol on our premises is strictly prohibited.
- If a manager has reasonable suspicion to believe that an employee's use of drugs and/or alcohol may adversely affect the employee's job performance or the safety of the employee or others in the workplace, the manager may request an alcohol and/or drug screening. A reasonable suspicion may be based on objective symptoms such as the employee's appearance, behavior, or speech.
- Consumption of alcohol at work-sponsored activities or with clients is to be limited and done with moderation. Never consume alcohol in a way that leads to impaired performance or inappropriate behavior, endangers the safety of others, or violates the law.
- Our full policy is set forth in the Substance Abuse Policy provided in employee onboarding materials and on Ensider.



TO LEARN MORE:

- [Substance Abuse Policy](#)

DEDICATION TO EXCELLENCE: Leaving Responsibly

Employees who leave the Company must:

- Promptly return all Company assets, including physical materials and Entegris' information assets, such as computers, mobile phones, calling cards, access cards, keys, business cards, and electronic storage media.
- Not make or take copies of Entegris information when departing.
- Not disclose Entegris non-public information to others even after leaving the company.

Failure to comply with this obligation may result in severe civil and criminal penalties.





Corporate Headquarters

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