

**Atotech Beteiligungs und Management GmbH & Co. KG and Atotech Deutschland GmbH & Co. KG
Rules of Procedure for Receipt and Processing of Reports by Third Parties
Under the German Act on Corporate Due Diligence Obligations in Supply Chains**

These rules of procedure apply to the receipt and processing of reports submitted by third parties, such as individuals associated with suppliers of Atotech Beteiligungs und Management GmbH & Co. KG and/or Atotech Deutschland GmbH & Co. KG (collectively, the “Company”), relating to human rights or environmental related risks or violations within the Company or its supply chain, as defined in the German Act on Corporate Due Diligence Obligations in Supply Chains (the “Act”) (“Reportable Matters”).

These rules of procedure do not apply to reports submitted by employees of the Company. Employees should refer to the MKS Code of Business Conduct and Ethics and related employee policies and procedures for information regarding the receipt and processing of reports submitted by employees.

1. **MKS Compliance Hotline.** Third parties may submit reports relating to Reportable Matters through the Compliance Hotline maintained by the Company’s parent company, MKS Instruments, Inc. (“MKS”), as follows:

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

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

We encourage you to identify yourself when submitting reports so that we may follow up with you, as necessary, for additional information and may adequately investigate and address the matter. However, you may submit reports anonymously if you wish (unless anonymous reports are contrary to local law). We may be prevented from investigating and/or addressing matters raised in reports made anonymously, if contrary to the local laws of a particular country.

2. **Communicating with you.** We will confirm receipt of your report within a reasonable period of time following receipt and will communicate with you as described below, unless your report has been made anonymously and contact is not possible. Following review of your report, we will inform you if your report does not relate to a Reportable Matter. If your report relates to a Reportable Matter within the scope of these rules of procedure, we will (i) follow up with you, as necessary, to discuss the information provided in your report and, and (ii) following review and investigation, inform you of the status of the matter and the measures taken or to be taken to address the matter. We will communicate with you through the MKS Compliance Hotline, or via email or telephone, as we deem necessary and appropriate.

3. **Processing of reports.** Reports relating to Reportable Matters will be processed by personnel of MKS who are appropriately trained to understand and investigate the reported matter and who will act impartially and independently. Such reports will be treated confidentially, and your identity and personal data will not be disclosed, except to the extent permitted by law and necessary to properly investigate and address the matter. Such reports will be processed

promptly; however, the timeframe for review and investigation of each report will vary depending on the nature and circumstances of the report.

4. **Protection of reporters.** You may submit reports relating to Reportable Matters without fear of disadvantage or punishment. The Company will not tolerate retaliatory measures on account of reports or information provided by any person in good faith, whether or not such information is ultimately proven to be correct.
5. **Contact.** The Compliance function within MKS' Corporate Legal Department is responsible for administering the MKS Compliance Hotline and these rules of procedure. If you have any questions regarding these rules of procedure, please contact us at legal@mksinst.com.