

Policy statement on the Supply Chain Due Diligence Act and implementation at ASMPT GmbH & Co. KG

The fulfillment of due diligence obligations as an overall corporate task and our commitment to respecting human rights and environmental protection



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Preface

As a global company, we at ASMPT are aware of our responsibility towards our environment and society: protecting human rights and our environment is a top priority along our supply chain. We are therefore committed to respecting human rights in our own business activities as well as in our global supply and value chains and to providing access to remedy for those affected by human rights violations.

In this respect, we align our business activities with the internationally recognized United Nations Guiding Principles on Business and Human Rights and therefore implement the requirements of the National Action Plan for Business and Human Rights.

In addition, our understanding and our human rights due diligence processes are based on the following international human rights instruments to which we are committed:

The International Charter of Human Rights, i.e. the United Nations Universal Declaration of Human Rights, as well as the International Pact on Civil and Political Rights and the International Pact on Social Rights, which define civil, political and social rights to which all people are entitled for the sake of their dignity.

The core labor standards of the International Labor Organization (ILO) with its four basic principles on freedom of association and the right to collective negotiation, the elimination of forced and child labor and the prohibition of discrimination in respect of employment and profession.

We expect our business partners to also commit to respecting human rights, to establishing appropriate due diligence processes and to passing these expectations on to their own suppliers.

We are committed to corporate responsibility, both within ASMPT and beyond the boundaries of our business activities. Sustainability, inclusion and diversity, equality and respect, the physical and mental health of employees: A sense of responsibility is embedded in all aspects of our actions. For each of us individually and for the Group as a whole.

This declaration of principles applies to ASMPT GmbH & Co. KG and all its subsidiaries. The results of our risk analysis for 2024 will not be available to us until the end of 2024 and will therefore be published with the annual update of this policy statement.



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Strategy and establishment

Anchoring the human rights and environmental strategy within the organization

For us, respect for human rights is a continuous process. The implementation of human rights due diligence obligations depending on changing contextual conditions, the type of business activity and the size and structure of the company is constantly reviewed and continuously developed.

We have therefore anchored human rights due diligence processes as an integral part of our organization and in our relationships with our business partners to ensure respect for human rights.

At ASMPT, compliance with human rights and environmental protection is seen as a task for the entire company. This is why the strategy is also anchored in all key processes and structures. On the one hand, the basic understanding is already set out in our corporate guidelines (Code of Conduct), which we require all production sites to comply with. On the other hand, awareness is raised through regular compliance initiatives. The health and safety of ASMPT employees is also regularly reviewed and appropriate safety measures are taken, for example in the workplace. Recurring health days and risk assessments are also carried out. Compliance with our standards and values is also a top priority when selecting new employees.

In addition to being embedded in our internal business area, implementation within our supply chain is a key area. Our standards are already considered in the procurement strategy and have a significant influence on the careful selection of our suppliers. Identified product group risks are taken into account and evaluated for the affected product group strategies. In addition to taking them into consideration in our strategies, we have also installed processes and guidelines to ensure that they are implemented by our suppliers. Here we rely on our Code of Conduct for Suppliers, which is a prerequisite for a business relationship, on-site spot checks of suppliers and solid risk management.

Monitoring of risk management and management responsibility

Compliance with human rights and environmental principles is a priority in our day-to-day business at ASMPT. We have defined clear responsibilities for the exercise of and compliance with our human rights due diligence obligations. At the highest management level, our Executive Board is responsible for respecting human rights in our business activities and in the upstream and downstream value chain in collaboration with our Compliance Office. As part of this, a Human Rights Officer has been designated to ensure compliance with human rights due diligence obligations, particularly with regard to the Supply chain Due Diligence Act. Regular and ad hoc internal reporting to the management on the results of our continuous risk analysis relevant to human rights, information from our grievance mechanisms and information on the effectiveness of our remedial and preventive measures and complaints procedures ensures that informed decisions can always be made.

Description of human rights-related and environmental expectations of own employees and suppliers

Principles

Our goal in ASMPT is to strive for continued total customer satisfaction. We achieve this through quality products and reliable customer service. Underlying the foregoing is our strong commitment to ethics and integrity and our core values define the means by which we do business. We believe that doing the right thing each and every day is critical to our ongoing success.

Similarly, we expect our business partners to share in our values and beliefs. Our business partners include sales agents and distributors, suppliers, contractors, freight forwarding agents and consultants, amongst others. Our Code of Business Conduct sets out our clear expectation of the standards that our business partners should follow. We only do business with companies that meet our ethical standards.

Respecting our employees

ASMPT recognises that the well-being of our employees is a crucial factor in our daily business, and is committed to ensure that our employees are treated with respect. ASMPT follows all applicable labour and legal laws and regulations wherever we conduct business. In addition, ASMPT aligns practices to industry standards, including the Responsible Business Alliance Code of Conduct, to uphold the human rights of our employees.

Discrimination and Harassment

ASMPT does not permit nor condone any discrimination against any one because of his or her gender, race, colour, age, religion, sexual orientation, nationality or ethnicity, political affiliation, pregnancy, marital status, disability, veteran status, and/or other characteristic protected under applicable law. No decisions of recruitment, salary adjustment, promotion prospects, staff benefits and access to training shall be based on the above criteria. We do not permit nor condone any form of harassment, violence, abuse or exploitation.

Freely chosen employment

There is no forced, bonded (including debt bondage) or indentured labour in ASMPT, and all employment is freely chosen and voluntary. In compliance to the Modern Slavery Act 2015 UK, no slavery or human trafficking is allowed. All employees are treated in a fair and humane manner in addition to freedom of movement in that there are no unreasonable restrictions on entering or exiting company-provided facilities. Employees are not required to surrender any government-issued identification, passports, or work permits as a condition of employment, unless such holdings are required by law. Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment beyond the regulatory or industry

guidelines. There shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms.

Child labour

ASMPT does not employ any person who is under the minimum age requirement stipulated in local labour laws and regulations or under the age for completing compulsory education. We support apprenticeship and internship programs that comply with local laws and regulations, including the health and safety of these participants.

Wages and benefits

Compensation including overtime pay and deductions from wages to employees and use of temporary, dispatch and outsourced labour shall comply with all applicable local labour and wage laws. Every employee's salary and benefit commensurate with individual qualification and working experience, with regular review of salary ranges to reflect competitiveness. Salary is highly confidential and personal, and thus, inappropriate to disclose such private information to others, including fellow colleagues.

Working hours

Our working hours follow strictly the requirements stipulated in the local labour laws and, if needed, we will review our practices with references to such requirements.

Freedom of Association

ASMPT recognises the right and freedom of association of our employees in accordance with local laws.

Health & Safety

ASMPT strives to minimize any potential safety hazards and complies with all applicable local laws regarding safety requirements. Practices such as proper design, engineering controls and administrative controls are adopted. Appropriate measures shall be taken where possible to eliminate physical and chemical hazards. Where physical or chemical hazards cannot be eliminated, appropriate engineering controls such as physical guards, interlocks and barriers, or closed systems and ventilation are adopted. In addition, appropriate and qualified personal protective equipment and appropriate administrative controls such as safe work procedures are provided. Reasonable steps are taken to remove pregnant women/nursing mothers from working condition with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers. You shall adopt and at all times follow all safety measures put in place ASMPT identifies, evaluates and controls our employees' exposure to hazards of physically demanding tasks, including manual

handling, heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks.

Emergency Preparedness

ASMPT identifies and assesses potential emergency situations and events, and their impact minimized by implementing emergency plans and response procedures. You shall follow these plans and procedures which include effective measures such as emergency reporting, employee notifications and evacuation procedures, emergency drills and recovery plans.

Occupational injury and illness

Procedures and systems are established to prevent, manage, track and report occupational injury and illness. You are encouraged to report, classify and record injury and illness cases. Managers and supervisors shall investigate cases and implement corrective measures to eliminate the causes, provide necessary medical treatment and facilitate the return of your workers to work.

Sanitation and Hygiene

ASMPT believes that a clean working environment is beneficial to the well-being of our employees. We strive to maintain a high level of hygiene in the workplace through practices like regular office cleaning, daily cleaning of public/common areas and provision of clean drinking water.

Anti-Corruption

ASMPT follows local and other applicable international anti-corruption laws in all countries where we do business, including the Foreign Corrupt Practices Act USA, the Bribery Act UK, and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. We compete fairly for orders with the quality and the price of our innovative products and services, not by offering improper benefits to others. You may not directly or indirectly offer, promise, grant or authorise the giving of money or anything of value to a government official or private commercial counterparty to influence action or obtain an improper advantage.

Environmental Sustainability

Part of being an ethical company means doing business responsibly and protecting our global community. ASMPT is committed to comply with all applicable environmental rules and regulations, and to minimise adverse effects on the community, environment and natural resources while safeguarding the health and safety of the public and employees. You must abide by these laws and environmental policies and procedures established by the business for the protection of the environment.

Responsible Sourcing of Minerals

ASMPT takes appropriate measures to assure that the tantalum, tin, tungsten, gold (3TG) and cobalt used in the products we manufacture are not directly or indirectly sourced from restricted or embargoed countries. Some countries have trade restrictions imposed due to financing terrorism, involved in narcotics trafficking or proliferation of weapons of mass destruction benefiting armed groups, or perpetrators of serious human rights abuses. You must exercise due diligence as set out in the Company's policies and procedures with your supply chain to ensure international trade compliance, and alignment to the Responsible Business Alliance's Responsible Minerals Initiative. Such responsible sourcing of minerals has to be communicated to your suppliers and the suppliers' suppliers, to ensure the entire supply chain is compliant.

Anti-Money Laundering

Money laundering is the process of disguising the nature and source of money connected with criminal activity such as terrorism, drug trafficking or bribery, by integrating tainted monies into the stream of commerce so that it appears legitimate or its true source or owner cannot be identified. ASMPT conducts business with reputable customers, suppliers, consultants and business partners involved in lawful business activities and whose funds are derived from legitimate sources. We do not facilitate money laundering and abide by applicable anti-money laundering laws. Our processes and procedures are designed to detect and deter suspicious forms of payment or customers or other transactions that could involve money laundering. To avoid problems in this area, you must be attentive to and report suspicious behaviour by customers, consultants and business partners. You must also follow all accounting, record-keeping and financial reporting requirements applicable to cash and payments in connection with other transactions and contracts.

Landrights

Suppliers respect the prevailing land rights and prohibit any unlawful eviction or deprivation of land, forests and waters, the use of which secures the livelihood of one or more persons, in particular during acquisition or construction.

Risk analysis and preventive measures

Relevant human rights issues and potentially affected groups of people

We recognize that our business activities and our global supply and value chains have the potential to cause adverse impacts on human rights. We are committed to respecting all internationally recognized human rights and focus our human rights due diligence processes in particular on the following human rights issues:

- Forced and child labor

- Restrictions on the freedom of association (this also includes the systematic combating, suppression and sabotage of employee representatives)
- Discrimination in any form (e.g. based on gender, age, ethnic and social origin, nationality, religion or ideology, physical or mental disability, sexual orientation)
- Health and safety hazards in the workplace
- precarious employment and working conditions (e.g. in the case of unregulated temporary work or the abuse of short-term contracts)
- Corruption and bribery
- restriction of the rights of local communities and indigenous peoples
- Damage to health, the shelter or economic assets required for subsistence, for example through water, soil or air pollution or deforestation
- Restriction of land rights

In our efforts to respect human rights, we focus on the following groups of people, as their human rights are potentially jeopardized by business activities along our global supply and value chains:

- Our own employees at national and international locations, including trainees
- Employees of business partners
- Groups of people in our direct and indirect supply chain: employees in the production and processing of raw materials and the manufacture of intermediate products, employees of service providers and direct suppliers
- Groups of people in our downstream value chain: employees of customers, end customers, people in the environment of the products
- Groups of people regardless of their location in the value chain: people in informal or precarious employment relationships, trade union representatives and trade unionists on site (directly or at suppliers, service providers and business partners, joint venture employees)
- Groups of people with an indirect link to the value chain: members of local communities and residents near sites, family members, employees of public authorities

Implementation and procedure for risk analysis

We use various components to determine the risk potential within our supply chain: The identification of country risks, product group risks and our ability to influence individual suppliers. If a risk is identified, a defined catalog of measures takes effect.

The determination of country risks is based on eight different indices and reports:

- Global Slavery Index
- Global Rights Index

- Global Childhood Report
- Global Health Security Index
- Environmental Performance Index
- International Property Rights Index
- Human Development Report
- Freedom House Report

We also update our risk analysis annually in line with the newly published sources mentioned above. The individual sources are weighted and prioritized accordingly; this weighting and prioritization also takes place at least once a year.

We use the analyses of the Sustainability Accounting Standards Board (SABS), Business and Human Rights Resource Center (BHRRC) and CSR Risk Check based on the research report of the Federal Ministry of Labor and Social Affairs entitled "Respect for human rights along global value chains" to determine the commodity group risks.

We determine our ability to impact based on the turnover we have with our suppliers. We differentiate between high, medium, low and insignificant influence. These levels are also reviewed at least once a year and adjusted if necessary.

If a risk is identified based on the analyses described above or if our whistleblowing system indicates a risk, for example, a six-stage catalog of measures is implemented depending on the level of risk. If none of the measures take effect, we reserve the right to terminate our business relationship with the supplier as a final step.

Results of the risk analysis

The results of the 2024 risk analysis will not be available to us until the end of 2024 and will be published in the updated policy statement.

Preventive measures

In order to fulfill our responsibility to respect human rights, we rely on a combination of different measures. The aim is to protect the (potentially) affected persons and to prevent or at least minimize adverse human rights impacts on them. We have established standardized processes for this purpose. Firstly, ASMPT employees are expected to comply with the principles set out in our Business Code of Conduct. This Business Code of Conduct is regularly reviewed and updated. In addition, ASMPT employees receive regular training on various compliance issues and are made aware of the need to comply with our Business Code of Conduct. This document is publicly available for everyone to access. Employee groups that can actively influence compliance with the Supply Chain Act are also trained with this focus. We have also installed a global whistleblowing system that enables anyone to report a violation anonymously. The system is managed by our independent global compliance team. This ensures that our own employees cannot suffer any disadvantage from a

whistleblowing report. Outside our company, we contractually oblige at least all of our direct business partners to comply with the laws applicable in the respective country and the core labor standards of the ILO, to respect human rights and to appropriately address human rights-related risks with their own business partners. Furthermore, we also monitor our suppliers' compliance with these requirements by means of spot audits in which we verify the accuracy and correctness of the information provided by the suppliers on site. At ASMPT, orders of particular importance in terms of value are checked individually for criteria including human rights and environmental aspects, and compliance is therefore checked before the first order is placed. On the other hand, many of our suppliers and ASMPT are bound by local legislation, which we comply with to the letter and are also supported by regular inspections by government agencies. Based on our annual risk analysis, we also check whether more far-reaching preventive measures are necessary and adapt them accordingly if necessary.

Communication of the results

For us, respecting human rights and implementing human rights due diligence in our operational processes is an important contribution to improving the human rights situation along the global supply and value chains. We accept this challenge and are committed to continuously developing our human rights due diligence processes. We attach great importance to effective due diligence processes.

The results of the analysis of human rights risks and impacts are incorporated into our corporate decision-making processes with regard to supplier selection, business partner management, product responsibility and development as well as mergers and acquisitions. The risk analysis forms the basis for identifying appropriate measures. The Executive Board regularly discusses human rights conflicts of interest and relevant findings from our human rights due diligence processes. In addition, we use the results as a basis for creating and, where necessary, adapting internal regulations, processes and training in order to meet the changing requirements of our due diligence processes.

Changes and event-driven effectiveness review

We review the effectiveness of our measures to prevent and mitigate adverse human rights impacts at least once a year and on an ad hoc basis. We also check whether our requirements are being met. Within our company, we also carry out risk-based audits, investigate all reports of potential human rights violations, conduct employee surveys and check the effectiveness of training and development measures. We check the effectiveness of measures in our value chain by monitoring the results of our continuous analysis of human rights risks and impacts. We also carry out risk-based audits at our direct suppliers, e.g. in the form of document reviews and on-site inspections.

Identification of injuries and remedial measures

In the event that we as a company have directly caused the violation of human rights, we work quickly to prevent the business activities that caused this or to make them compliant with human rights and work towards reparation. If our employees behave in a way that is incompatible with human rights, appropriate sanctions are introduced.

In the event that we contribute to potential or actual human rights violations through our business activities or are indirectly associated with them, we endeavor to contribute to appropriate remediation and prompt redress by the responsible parties. If we have a well-founded suspicion or concrete indication of possible human rights violations in our company or along our upstream and downstream value chain, we investigate this carefully and consistently. We require our business partners to support us in clarifying the facts and to cooperate fully within a reasonable timeframe. Depending on the severity of the violation, we reserve the right to respond appropriately to our business partners, from requesting that the violation be remedied immediately to taking legal action and terminating the business relationship. Irrespective of this, we work towards remedying the violations. If these measures are not effective within an acceptable period of time, we reserve the right to terminate the business relationship with these suppliers.

Complaints procedure

We reject all forms of human rights violations. Appropriate and effective complaints management is therefore an important part of our due diligence processes in order to effectively prevent and remedy any potential adverse human rights impacts caused by our company and our business activities. We operate a whistleblower system that provides a confidential communication channel for internal and external stakeholders and all potentially affected parties worldwide to report possible violations of human rights and international treaties. Reports can also be made anonymously. We actively inform the target groups to be reached about the available grievance mechanisms using measures that are adapted to the target group and the local context. All reported information and substantiated suspicions of possible human rights violations are processed as part of a transparent, balanced and predictable process for all parties involved. The confidentiality and anonymity of whistleblowers is respected. As far as possible and within our sphere of influence, we ensure that whistleblowers are protected from discrimination and punishment in connection with the complaints they submit. Our systematic handling of complaints and the knowledge gained from them enables us to continuously improve our human rights due diligence processes. We also review the effectiveness of the existing grievance mechanisms in line with the effectiveness criteria of the United Nations Guiding Principles on Business and Human Rights once a year and on an ad hoc basis in the event of significant changes in the risk situation or specific indications of restrictions in grievance management.