

# Whistleblowing – Rules of Procedure

These Rules of Procedure apply to ASMPT's Whistleblowing Reporting System for the EU region ("**EU Whistleblowing System**"), and the management of whistleblowing reports that are received in the EU region. They are accessible on the ASMPT Whistleblowing Policy website for the EU region, and all personnel involved should abide by them.

# 1. Whistleblowing Channels for the EU Region

The ASMPT EU Whistleblowing System provides a direct online channel for submitting whistleblowing reports or information within the EU region. This online whistleblowing platform is accessible to both ASMPT's EU employees and EU individuals or organizations outside ASMPT. It is available through the following website:

https://smt.asmpt.com/en/whistleblowing-policy/eu-report/

Suspected violations of laws or internal regulations, including those concerning human rights and environmental obligations, can be reported online using this platform or through various other channels such as ASMPT's Management, Compliance Office, managers, employee representatives, Human Resources, or other trusted employees.

Reports can pertain to individual ASMPT employees, ASMPT suppliers, or ASMPT's business activities within the supply chain or may involve other business partners.

The Compliance Office, serving as the Whistleblowing Reporting Office ("**Reporting Office**"), is available to address inquiries regarding the whistleblowing channels in the EU region and provide clarifications regarding whistleblowing reports in the EU region that are submitted to ASMPT.

## 2. Responsibility

The Compliance Office is responsible for operating the EU Whistleblowing System. Each case is handled confidentially by whistleblowing case officers ("**Case Officers**") assigned by the Compliance Office. Case Officers work independently on whistleblowing reports and are not influenced by the management during investigations. The Compliance Office oversees the investigation and reports the findings of every whistleblowing report to the Audit Committee of ASMPT's Board of Directors, which has full oversight of ASMPT's Corporate Governance Framework.



# 3. Confidentiality

The Compliance Office ensures strict confidentiality of whistleblowers' identities, except when disclosure is required by law. This confidentiality is maintained through the EU Whistleblowing System, which collects data via 2bAdvice's cloud portal, allowing for anonymous data entry. Information from whistleblowing reports, including identity-related data, is stored on ASMPT's IT infrastructure. Internal data access is controlled by ASMPT SMT's Data Protection Officer in compliance with the EU General Data Protection Regulations. Only the Compliance Office has access to this data for the purpose of investigating reports and addressing violations of the ASMPT Code of Business Conduct.

In any communications within the company, no reference to the whistleblower's identity will be made, including any information that could indirectly reveal their identity.

# 4. Handling of Whistleblowing Reports

## a. Confirmation of Receipt

The Case Officer will confirm receipt of a whistleblowing report via the EU Whistleblowing System within a maximum of 7 days from receiving the report, in compliance with relevant legal requirements.

### b. Review of Report

The Case Officer takes every whistleblowing report seriously and promptly reviews its details, including any attached files, to assess whether there is sufficient information to initiate an investigation or if further details are needed.

## c. Clarification of Report

The Case Officer will promptly seek clarification from the whistleblower after reviewing the details of the whistleblowing report, if necessary or appropriate. Clarification questions may be communicated to the whistleblower through the EU Whistleblowing System or via any contact information provided in the report, such as email addresses or telephone numbers.



## d. Investigation of Report

The Case Officer will begin investigating the report after receipt of sufficient information from the whistleblower, and the investigations may include the following:

- Interviewing Named Parties and/or Witnesses. If someone is expressly
  named as a participant or witness in the whistleblowing report or from the
  investigation of the whistleblowing report, they shall be given sufficient
  opportunity to provide a response to any findings.
- Inquiring with Relevant Departments or Companies. Any persons or companies implicated in the investigation will be notified of the allegation and asked to provide a response. Communication through internal hierarchies, such as the relevant department heads or management, will be considered where necessary or appropriate. If necessary, discussions with other relevant employees will be arranged through these internal channels.
- Other Elucidative Measures. This may involve reviewing documents or available information. Individuals interviewed, except for the whistleblower (see Section 6 below), must be informed that any involvement in the reported violation, as well as their behavior in response to the investigation, may have legal or disciplinary consequences.

### e. Development of Remedial Measures

The Case Officer, along with the relevant management and department heads, if necessary, will develop feasible remedial measures to address reported issues and prevent similar violations in the future. The selected remedial measures should have a high likelihood of resolving the underlying issue. If multiple equally suitable remedial measures exist, the final responsibility for selection rests with the management or department heads, who shall consider all relevant factors when making their decision.

## f. Feedback to Whistleblower

The whistleblower will receive feedback on the whistleblowing report, which may be provided through the EU Whistleblowing System. This feedback will include a summarized outcome of the findings and, if applicable, details of any remedial measures implemented in response to the findings.



## g. Monitoring of Remedial Measures

The Case Officer shall monitor the implementation of the remedial measures developed in response to the report. The Case Officer will take all possible measures to expedite the process.

If it is foreseeable that certain remedial measures initiated will not lead to the desired outcomes, the Case Officer will ensure that follow-up measures are determined or developed, and then implemented to adequately address the findings of the whistleblowing report.

If the remedial strategy changes, the whistleblower will be informed accordingly via the EU Whistleblowing System.

### 5. Documentation

Case Officers shall document every report received and the actions they have taken including, in particular, notes of conversations with those involved and/or witnesses as well as any anonymized correspondence with the whistleblower. All documentation on the remedial measures as well as any evidence should also be collected. After the whistleblowing report has been successfully addressed and remedial measures implemented, a final note should be created and documented accordingly in the file.

### 6. Protection for Whistleblowers

Whistleblowers who submit reports in good faith will not face any adverse consequences as a result of the report, unless otherwise provided under the law. In cases of doubt, Case Officers are the contact persons for whistleblowers who find themselves exposed to such consequences. Case Officers must examine and clarify these allegations. All plausible claims of discrimination will be investigated. Well-founded allegations of discrimination within ASMPT will be handled as a compliance violation.