

ASM Pacific Technology Ltd (“ASMPT”) Supplier Code of Conduct

ASMPT has a strong commitment to ethics and integrity, and all employees are expected to perform their jobs honestly, diligently and responsibly. Observing the laws in every country where we do business is the fundamental principle of ASMPT. This ASMPT Supplier Code of Conduct (“Supplier Code”) establishes the standards for conducting business with ASMPT. We expect our business partners to share in our culture, values and business practices, and expect our business partners to act in a manner consistent with our Supplier Code.

“Supplier” means any individual, company, or other entity that provides, or seeks to provide, goods or services to ASMPT.

Supplier is responsible for communicating the contents of this Supplier Code to its officers, directors, employees, agents, subcontractors and suppliers who are involved in the procurement and production process related to products and services provided to ASMPT.

Legal Compliance

Supplier shall comply with all the laws and regulations of the places where it does business and relating to each subject matter below, including but not limited to the Foreign Corrupt Practices Act USA, the Bribery Act UK, the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, and the Modern Slavery Act UK. In addition, ASMPT aligns our practices to industry standards, including the Responsible Business Alliance Code of Conduct, and thus, we expect our suppliers as well as their suppliers to similarly align and promote such practices to its supply chain.

Respect for Employees

Supplier shall promote equal opportunities for and treatment of its employees irrespective of his or her gender, race, colour, age, religion, sexual orientation, nationality or ethnicity, political affiliation, marital status, disabilities, and/or other aspects. Supplier shall respect the personal dignity, privacy and rights of each individual. There shall not be unacceptable treatment of employees in any form, such as harassment, violence, abuse or exploitation. Supplier shall provide fair remuneration and to guarantee the applicable national statutory minimum wage, and comply with the maximum number of working hours laid down in the applicable laws. Supplier shall recognise the right of free association of its employees in accordance with local labour laws.

Freely Chosen Employment

There shall be no forced, bonded (including debt bondage) or indentured labour, and all employment is freely chosen and voluntary. In compliance to the Modern Slavery Act 2015 UK, no slavery or human trafficking is allowed. Supplier’s workers¹ are not required to surrender any

¹ “Worker” under the Responsible Business Alliance refers to a foreign migrant worker who is recruited and moves legally from his or her home country to another country for the specific purpose of employment

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. If any such fees are found to have been paid by workers, such fees shall be repaid to the workers. As part of the hiring process, workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment prior to the worker departing from his or her country of origin and 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.

Prohibition of Child Labour

Supplier shall not employ workers who are under the age of 15 or the minimum age requirement stipulated in local labour laws and regulations or under the age for completing compulsory education, whichever is lower. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Supplier shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. Supplier shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.

Health and Safety of Employees

Supplier shall take responsibility for the health and safety of its employees. There must be measures in place to control physical and chemical hazards, accidents and occupational diseases, and a reasonable occupational health and safety management system. 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 and nursing mothers. Its employees shall be trained and educated in health and safety issues.

Fair Dealing and Competition Laws

Supplier shall not engage in collusive bidding, price fixing, dividing territories, allocating customers, price discrimination or other unfair trade practices in violation of applicable antitrust or competition laws. Supplier shall uphold fair business standards in advertising, sales and competition.

Prohibition of Corruption and Bribery

Supplier shall comply with all applicable anti-corruption laws and regulations of the countries in which it operates, including the Foreign Corrupt Practices Act USA, the UK Bribery Act, the OECD Anti-Bribery Convention and any international anti-corruption conventions. Supplier shall not offer or accept bribes or employ other means to obtain an undue or improper advantage. Bribes, kickbacks, facilitating payments and similar payments to government officials, private individuals or companies, ASMPT's employees or agents acting on ASMPT's behalf are prohibited. ASMPT has zero tolerance for violations.

Anti-money Laundering

Supplier shall abide by applicable anti-money laundering laws and shall not facilitate money laundering. Supplier shall conduct business with reputable suppliers, consultants and business partners involved in lawful business activities and whose funds are derived from legitimate sources.

Trade Compliance

Supplier shall comply with all applicable import and export controls, and customs laws and regulations in the countries where it does business. Supplier shall abide by all applicable economic sanctions that its country adopts including embargoed or sanctioned countries, and controlled products.

Conflicts of Interest

Supplier must recognize and avoid conflicts of interest, or even the appearance of a conflict of interest. It is the responsibility of the Supplier to inform ASMPT of any conflict of interest it could possibly have in connection with the execution of its business dealings with ASMPT. Having a conflict of interest is not necessarily a violation of the Supplier Code, but failure to disclose it always is.

Protection of Intellectual Property

Supplier must respect intellectual property rights, including patents, trademarks, copyrights and process designs, and safeguard ASMPT's confidential and proprietary information. Any transfer or sharing of technology or know-how must be done in a manner that protects intellectual property rights and is in compliance with local and international laws concerning data privacy and security. Any violations are viewed seriously, and ASMPT has zero tolerance for violation.

Data Privacy and Security

Supplier shall comply with all local Personal Data Protection laws concerning data security and privacy, and shall protect and safeguard data provided by ASMPT, which may include private and sensitive information. Any transfer or sharing of data must be done in a manner that protects such information from inadvertent or unauthorized disclosure and any disclosure must be in compliance with local and international laws.

Environmental protection

Supplier shall act and obtain all necessary permits in accordance with the applicable statutory and international standards regarding environmental protection, which include but are not limited to pollution, air emission, hazardous substances and waste disposal. There shall be controls in place to minimize environmental pollution and make continuous improvements in environmental protection.

Responsible Sourcing of Minerals

Supplier shall exercise due diligence to ensure that the tantalum, tin, tungsten, gold (3TG) and cobalt in the products it manufactures or supplies to ASMPT are not directly or indirectly sourced from restricted or embargoed countries, as laid out in the Responsible Business Alliance's Responsible

Minerals Initiative regarding responsible sourcing. Suppliers shall make its due diligence measures available to ASMPT upon request. It is the Supplier’s responsibility to communicate to its suppliers and its suppliers’ suppliers regarding such responsible sourcing of minerals, to ensure the entire supply chain is compliant with the sourcing of 3TG and cobalt.

Monitoring and Record Keeping

Supplier must maintain all documentation necessary to demonstrate its compliance with this Supplier Code and provide ASMPT with access to those documents in relation to Responsible Business Alliance assessment standards upon ASMPT’s request for review. Supplier is solely responsible for compliance with this Supplier Code by its officers, directors, managers, employees, representatives and agents.

Violation of this Supplier Code

If a Supplier violates any of the requirements contained in this Supplier Code, ASMPT may immediately terminate its supply relationship with that Supplier. Violations of this Supplier Code should be reported in confidence to the Whistleblower Hotline fraud@asmpt.com, or mail to:

Chairman of ASMPT Board
 ASM Pacific Technology Limited
 19/F, Gateway ts
 8 Cheung Fai Road, Tsing Yi
 New Territories, Hong Kong

Chairman of ASMPT Audit Committee
 ASM Pacific Technology Limited
 Room 1104, Crawford House
 70 Queen’s Road Central
 Central, Hong Kong

Declaration of Acceptance of the ASMPT Supplier Code of Conduct

By signing below, we acknowledge that we have thoroughly read the **ASMPT Supplier Code of Conduct**.

Furthermore, we acknowledge that we understand and agree to comply with the requirements specified within the **ASMPT Supplier Code of Conduct**.

Company Name:

Name of Person:

Title:

Date:

Signature

Company Seal

This "Declaration of Acceptance of the ASMPT Supplier Code of Conduct" must be signed by an authorized representative of the company and returned to ASMPT.