



***ASM GLOBAL
SUPPLIER CODE OF CONDUCT***



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ASM GLOBAL SUPPLIER CODE OF CONDUCT

To recognize and reinforce the standards to which ASM Global holds both itself and its suppliers, ASM Global has created this Supplier Code of Conduct reflecting its dedication to “doing the right thing” as well as demonstrating the ASM Global Values – being ethical, trusting and respecting each other, and ensuring quality. Fundamental to this belief is the expectation that our suppliers will, at a minimum, operate in full compliance with all applicable laws, rules and regulations. Without limiting the generality of the above or other requirements in agreements with ASM Global, ASM Global expects each of its suppliers to operate in an ethical manner and in compliance with this Supplier Code of Conduct which sets forth the basic principles for suppliers ASM Global engages. The principles outlined in the Supplier Code of Conduct are considered during the supplier selection process as well as throughout the duration of the business engagement.

ASM Global expects suppliers to firmly adhere to ethical principles for labor, health and safety, environment, management systems and supply transparency. Further, ASM Global expects suppliers to determine how to meet, demonstrate and integrate in its conduct compliance with all applicable laws, rules, regulations and Supplier Code of Conduct principles.



A blue-tinted background featuring four smiling business professionals: a woman on the left, a man in the center-left, a man with glasses in the center-right, and a woman on the right. The text is centered over the image.

CHAPTER 1:

***ETHICAL BUSINESS
PRACTICES***

CHAPTER 1: ETHICAL BUSINESS PRACTICES

BUSINESS INTEGRITY AND FAIR COMPETITION

Corruption, extortion and embezzlement are prohibited. Suppliers shall not pay or accept bribes or participate in other illegal inducements in business or government relationships, including any act in violation of the Foreign Corrupt Practices Act of 1977, as amended, 15 U.S.C. §§ 78dd-1. Suppliers shall conduct their business consistent with fair and vigorous competition and in compliance with all applicable anti-trust laws. Suppliers shall employ fair business practices including accurate and truthful advertising. Suppliers are not to use our name (or that of our affiliates or products) in publicity or advertising without our prior written consent.

SUPPLIER DIVERSITY

Suppliers are to identify and provide opportunities to small and diverse businesses in connection with supplying useful goods and services to ASM Global at competitive prices.

IDENTIFICATION OF CONCERNS

All workers should be encouraged to report concerns or illegal activities in the workplace without threat of reprisal, intimidation or harassment. Suppliers shall investigate and take corrective action, where necessary.

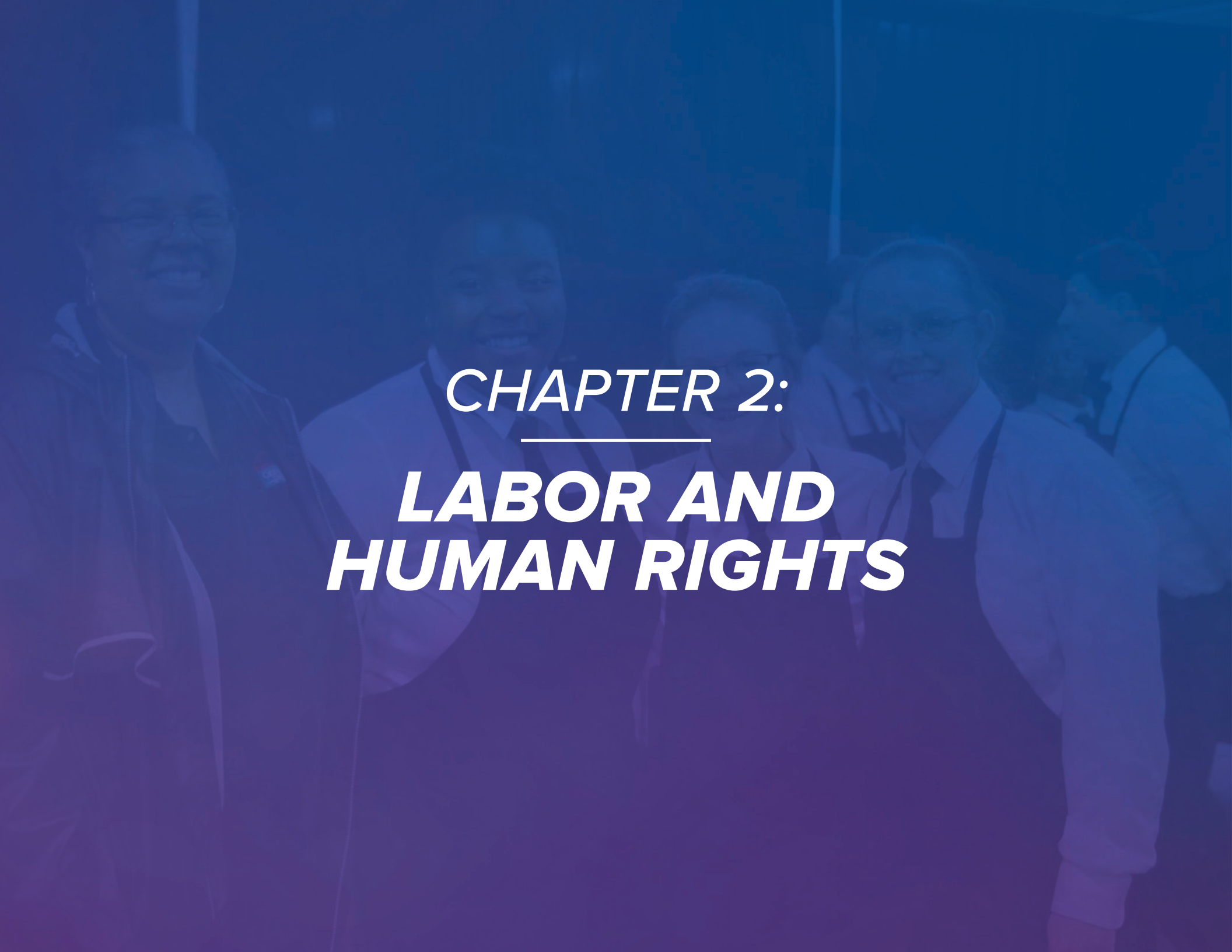
ACCURACY OF FINANCIAL AND BUSINESS RECORDS

Suppliers must maintain all financial books and records in conformance with generally accepted accounting principles. Business records must be accurate in all material respects. Business and financial records must be legible, transparent and reflect actual transactions and payments.

PRODUCT QUALITY

Suppliers involved in the supply, manufacturing, packaging, testing, storage and distribution of materials and/or products on ASM Global's behalf will ensure compliance with applicable Quality regulations and Good Manufacturing Practice requirements for the markets in which the products are registered and distributed.





CHAPTER 2:

***LABOR AND
HUMAN RIGHTS***

CHAPTER 2: LABOR AND HUMAN RIGHTS

FREELY CHOSEN EMPLOYMENT

Suppliers shall not use forced, bonded, involuntary, slave or indentured labor or involuntary prison labor.

CHILD LABOR AND YOUNG WORKERS

Suppliers shall not use child labor. The employment of young workers below the age of 18 shall only occur in non-hazardous work and when young workers are above a country's legal age for employment or the age established for completing compulsory education.

WAGES, BENEFITS AND WORKING HOURS

Suppliers shall pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. Suppliers shall, in a timely manner, communicate with workers the basis on which they are being compensated. Suppliers are also expected to communicate with workers whether overtime is required and the wages to be paid for such overtime.

NON-DISCRIMINATION

Suppliers should engage in appropriate action to further ASM Global's commitment to nondiscrimination and equal employment opportunities.

Suppliers shall provide a workplace free of harassment and discrimination and comply with all applicable laws and regulations. Suppliers shall not discriminate for reasons such as race, color, age, sex (including pregnancy, childbirth or related medical conditions), sexual orientation, gender identity, national origin, physical or mental disability, genetic information, religion, political affiliation, union membership, or veteran or marital status.

FAIR TREATMENT

All workers should be encouraged to report concerns or illegal activities in the workplace without threat of reprisal, intimidation or harassment. Suppliers shall investigate and take corrective action, where necessary.

FREEDOM OF ASSOCIATION

Open communication and direct engagement with workers to resolve workplace and compensation issues is encouraged. Suppliers shall respect the rights of workers, as set forth in local laws, to associate freely, join or not join labor unions, seek representation and join works councils. Workers shall be able to communicate openly with management regarding working conditions without retaliation, threat of reprisal, intimidation or harassment.





CHAPTER 3:

HEALTH AND SAFETY

CHAPTER 3: HEALTH AND SAFETY

WORKER PROTECTION AND SAFETY

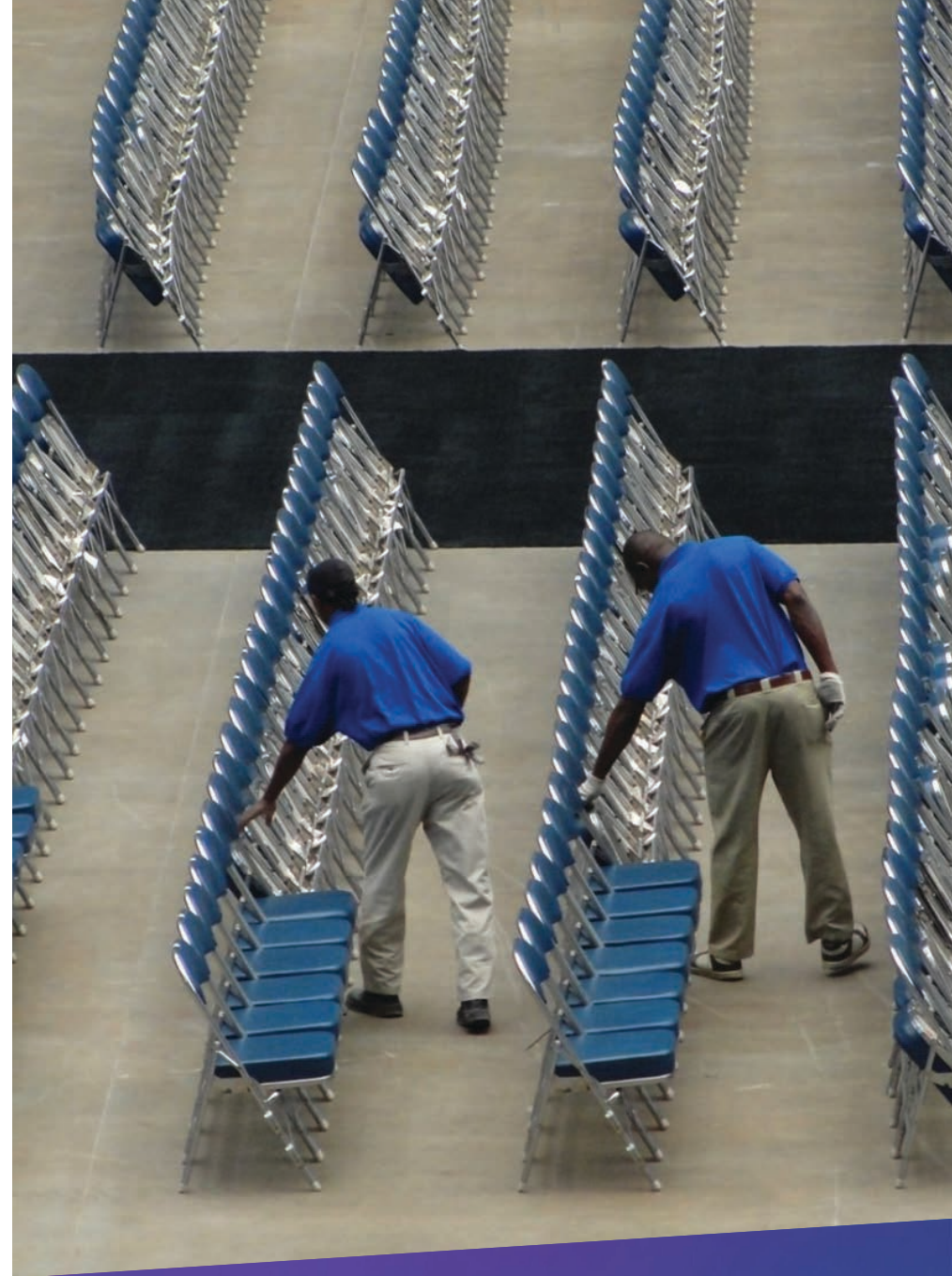
In the workplace Suppliers shall protect workers from overexposure to chemical, biological, physical hazards and physically demanding tasks.

Suppliers shall operate in compliance with all applicable health and safety regulations and ensure safety management systems are in place to prevent work- related personal injuries.

PROCESS SAFETY

Suppliers shall prevent or mitigate incidents associated with operations and processes that could result in catastrophic impact to people or the environment, on and off site. Suppliers' actions shall be commensurate with the risks associated with the potential impact.

Emergency Preparedness and Response Suppliers shall identify and assess emergency situations in the workplace and minimize their impact by implementing emergency plans and response procedures. Suppliers shall review and, if appropriate, update such plans and procedures annually or, more frequently, if necessary.





CHAPTER 4:

ENVIRONMENT

CHAPTER 4: ENVIRONMENT

ENVIRONMENTAL AUTHORIZATIONS

Suppliers shall comply with all applicable environmental regulations, laws, codes, and other governmental requirements and authorizations. Suppliers shall obtain and follow all associated operational and reporting requirements of required environmental permits, licenses, information registrations and restrictions.

WASTE AND EMISSIONS

Suppliers shall ensure the safe handling, movement, storage, recycling, reuse, or management of waste, air emissions and wastewater discharges. Prior to the release into the environment of any waste, wastewater or emissions, Suppliers must appropriately manage, control and treat any potential adverse impact to human or environmental health.

SPILLS AND RELEASES

Suppliers shall prevent and mitigate accidental spills and releases to the environment.

SUSTAINABILITY

Suppliers shall reduce their environmental footprint through minimizing their use of natural resources and the environmental impact of their activities.

CONFLICT MINERALS

“Conflict Minerals” refer to columbite-tantalite (tantalum), cassiterite (tin), gold, wolframite (tungsten), or their derivatives. ASM Global has adopted a Conflict Minerals policy establishing its objectives and goals with regards to Conflict Minerals in its supply chain. To support this policy, suppliers must promptly notify ASM Global if the products or materials they supply to ASM Global contain Conflict Minerals.





CHAPTER 5:

***MANAGEMENT SYSTEMS AND
SUPPLY TRANSPARENCY***

CHAPTER 5: MANAGEMENT SYSTEMS AND SUPPLY TRANSPARENCY

COMMITMENT AND ACCOUNTABILITY

Suppliers shall demonstrate commitment to the principles contained herein by allocating appropriate resources.

RISK ASSESSMENT AND MANAGEMENT

Suppliers shall identify, assess and manage risks in all areas.

CONFIDENTIAL INFORMATION MANAGEMENT

Suppliers shall safeguard and make only proper use of confidential information, including personal information, to ensure that rights and interests of ASM Global and those who have entrusted their information to ASM Global are protected.

DOCUMENTATION

Suppliers shall maintain documentation necessary to demonstrate conformance with these expectations and compliance with applicable laws, regulations, standards and ASM Global's requirements.

TRAINING AND COMPETENCY

Suppliers shall train their workers to achieve an appropriate level of knowledge, skill and ability to manage and address the expectations set forth herein.

BUSINESS CONTINUITY

Suppliers are responsible for developing and implementing appropriate business continuity plans for any and all operations supporting ASM Global's business.

CONTINUAL IMPROVEMENT

Suppliers are expected to continually improve by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections, or management reviews.

SUPPLY TRANSPARENCY

Suppliers shall provide information regarding their supply chain to support ASM Global's compliance with manufacturing practices, regulatory requirements, regulatory agency expectations, disclosure responsibilities and policies and our other legitimate business purposes.

SUPPLY DISRUPTIONS

Suppliers shall inform ASM Global of financial, economic, supply changes or other material conditions that affect or might affect the ability to supply ASM Global or ASM Global's ongoing operations or operating decisions.

