

Whistleblowing – The report of violations of laws and internal Compliance rules and regulations

Complying with statutory regulations and internal rules, and the principles laid down in our Code of Conduct and the Code of Ethics, has top priority at AIXTRON SE and its affiliates ("AIXTRON"). To meet these standards, it is important to learn of potential employee misconduct.

Who does this policy apply to?

This policy applies to all AIXTRON employees as well as lease employees, persons employed at AIXTRON for the purpose of their vocational training, persons who, due to their economic dependence, are to be regarded as equivalent to employees, such as service providers.

What complaints / concerns does this policy apply to?

The members of the Executive Board of AIXTRON SE encourage all employees to report any violations of the law and internal Compliance rules and regulations.

Making an internal report

A report can be made by using an email account established for this purpose (sb@aixtron.com).

Should you wish to make a report in person, please make an appointment in advance by writing an email to sb@aixtron.com. With the consent of the reporter, the meeting may also be held by means of video and audio transmission.

Confidentiality and non-retaliation

AIXTRON will take steps to maintain confidentiality for all parties involved, to the extent reasonable and practicable under the circumstances.

AIXTRON will not, without the reporter's explicit consent, disclose their identity or any information from which their identity may be directly or indirectly deduced, to another person other than those

- i) internal or external persons receiving the report,
- ii) internal or external persons taking follow-up measures as required under local law, or
- iii) supporting the persons listed under i) and ii) e.g., IT personnel.

The prohibition on disclosure will not apply where:

- the disclosure is a necessary and proportionate legal obligation in the context of investigations or judicial proceedings,
- the disclosure is otherwise required by law.

Where the reporter's identity or any other information from which their identity may be directly or indirectly deduced is disclosed to another person, the reporter will be notified in

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writing in advance, together with the reasons for the disclosure unless this would jeopardise the prevention of crime or the prosecution of a criminal offence.

Retaliation against those making reports, whether direct or indirect, and persons who facilitate or otherwise assist in the making of the report or the investigation process will not be tolerated. Individuals benefit from the protection provided for by applicable German statutory provisions.

Specifically, the reporter would be protected against retaliation. In addition, any "facilitators" are protected, i.e. no retaliation shall occur against

- third parties who confidentially support the employee in a report in a work related context,
- individuals who are related to the employee and who may suffer reprisals in a work related context, such as co-workers or relatives of the employee,
- legal entities that the employee owns, where the employee works, or to which the employee is otherwise connected, within a work related context.

In particular, reporters and facilitators are protected against any form of (threats and attempts of) retaliation (including termination, demotion, suspension, loss of benefits, threats, harassment or discrimination). Retaliation and reprisals by AIXTRON or its employees against colleagues are a serious and material violation of this procedure.

AIXTRON seeks to protect individuals from retaliation and reprisals, and AIXTRON will take appropriate disciplinary action against any employee who engages in retaliatory conduct.

Malicious or false reports

If it is found that the reporter person knowingly reported false information or that a report of wrongdoing was made maliciously, the person who made the report may be subject to disciplinary or legal action.

External reporting locally

AIXTRON strongly encourages reports to be made internally so that any concerns can be resolved. However, the German government has defined a designated authority, that also accepts reports on misconduct as external reporting channel. The external reporting channel generally is the Federal Office of Justice (Bundesamt für Justiz), the Federal Cartel Office (Bundeskartellamt) and the Federal Financial Supervisory Authority (Bundesanstalt für Finanzdienstleistungsaufsicht). More information on the competencies of each authority may be found on its website:

- Federal Office of Justice: [Federal Government's external reporting body \(bundesjustizamt.de\)](https://www.bundesjustizamt.de)
- Federal Cartel Office: [Federal Cartel's external reporting channel](https://www.bundeskartellamt.de)

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- Federal Financial Supervisory Authority: [Federal Financial Supervisory Authority - Contact Point for Whistleblowers](#)

In particular, the local external reporting channels can be found here. The reporting person may also make a Report to institutions, bodies, offices or agencies of the European Union, such as:

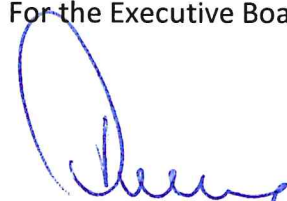
- European Commission
- European Anti-Fraud Office (OLAF)
- European Maritime Safety Agency (EMSA)
- European Union Aviation Safety Agency (EASA)
- European Securities and Markets Authority (ESMA)
- European Medicines Agency (EMA)

Data protection

Any processing of personal data alongside the handling and/or investigation of a protected concern must comply with AIXTRON's data protection rules and regulations and applicable data protection laws.

Herzogenrath, December 2023

For the Executive Board of AIXTRON SE



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CFO