



Compliance Code of Conduct

Integrity in action for the future

AIXTRON

Our commitment to Compliance

Dear colleagues,

Our technologically advanced products and customer-oriented services are key success factors for us as a technological market leader in global competition. In addition, the reputation of AIXTRON in the business world is one of our most valuable assets. It is largely influenced by our conduct in business, and it requires a firm commitment to transparent, and legally binding conduct by the entire AIXTRON organization: members of the Senior Management Team, Managers, Employees, and third parties working on behalf of AIXTRON. Together, we build trust, credibility, and reliability with all stakeholders. This commitment also includes personal integrity and accountability in everyday actions. Our business success must always align with legal standards, ethical principles, and moral responsibility. These values form the foundation of our compliance culture and responsible corporate governance — another essential pillar of our sustainable success.

Our Compliance Code of Conduct brings together two key aspects: Adherence to legal, regulatory and internal standards as well as responsible behavior rooted in mutual respect, recognition and appreciation – both within our internal teams and as well as in interaction with business partners. It also reflects our Compliance Core Values – integrity, responsibility, respect, innovation, transparency and accountability – which guide our actions and define who we are as a company. Additionally, it is important that we keep ourselves informed of and comply with the legal and regulatory frameworks of all the countries in which we operate.

To support this, we have defined clear rules and principles that guide us in making legally appropriate and ethically responsible decisions throughout the AIXTRON Group. In AIXTRON's global environment, when implementing the rules and principles of conduct, we also respect national laws, individual cultures, traditions, social norms and human rights within and beyond our corporate boundaries.

For us, the Compliance Code of Conduct is the internal standard for our compliance culture and at the same time, a promise to our stakeholders. It ensures that our actions and decisions are transparent and comprehensible. It applies to the corporate bodies and to all employees of AIXTRON SE and its subsidiaries.

In addition, it also applies to individuals who are functionally equivalent to our workforce, such as individuals from temporary employment agencies.

We also expect third parties working for AIXTRON (e.g. service providers and consultants) to take note of, observe and comply with the compliance rules and regulations including adherence to our Supplier Code of Conduct.

We expect our managers to act as role models by conscientiously and transparently exemplifying and communicating the rules and principles of conduct and ensuring compliance by employees and third parties.

We encourage everyone to actively support our compliance culture – including reporting known or suspected violations of the Compliance Code of Conduct. Reports can be made to direct supervisors, to the members of the Senior Management Team of the department and/or directly to the AIXTRON Group's Compliance Office.



Dr. Felix Grawert
Chairman of the Executive Board
AIXTRON SE



Dr. Christian Danninger
Chief Financial Officer
AIXTRON SE



Randy Singh
Chief Compliance Officer
AIXTRON Group

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Note regarding the General Equal Treatment Act: To improve readability, gender-specific terms are generally used in the masculine form. Such terms apply equally to all genders. AIXTRON always means AIXTRON Group as a whole and worldwide.



AIXTRON's Compliance Core Values



Integrity

We act lawfully, ethically, and transparently. Integrity means doing the right thing, even when no one is watching. We reject corruption, protect confidential information, and ensure our actions reflect our commitment to fairness and trust.



Innovation

As a technology leader, we embrace innovation with responsibility. We encourage creativity, support employee inventions, and use digital tools, including AI in a secure and ethical way to drive progress.



Responsibility

We take responsibility for our people, our products and the environmental impacts of our business activities. This includes protecting health and safety, using resources responsibly and addressing relevant sustainability requirements in our operations and business relationships.



Transparency

We communicate openly and honestly, within our teams, with our business partners, and with the public. Transparency builds trust and ensures that our decisions and actions are clear, traceable, and accountable.



Respect

We foster a culture of mutual respect, inclusion, and fairness. We value diversity and ensure equal opportunities for all. Discrimination, harassment, and any form of forced or child labor have no place at AIXTRON.



Accountability

We take ownership of our actions and decisions. Every employee and manager is expected to uphold our standards, report concerns, and contribute to a culture where ethical behavior is not just expected, but lived.



AIXTRON's Compliance Approach and Structure

Our Compliance Code of Conduct serves as a guide and refers to AIXTRON's guidelines and to applicable laws and regulations, which we must all observe in order to act in accordance with our core values and fundamental expectations.

Our compliance principle (core value) and objectives are key components of our Compliance Management System (CMS). It comprises organizational policies, measures and instruments.

Our **core value of compliance** ensures that all actions and decisions by the company, the corporate bodies and all individuals working for the company¹ are in compliance with **legal, regulatory, and internal requirements**.

Our **compliance objectives** comprise four main goals:

- **Protection** of the company, its governing bodies and all individuals associated with or working for the company against legal and regulatory risks;
- **Avoidance** of liability risks and compensation claims for the company, its governing bodies and all individuals associated with or working for the company;
- **Strengthening** trust in the company among our interested parties such as: customers, employees, investors, analysts, suppliers and society;
- **Maintaining** and continuously improving AIXTRON's positive image and reputation.

AIXTRON's Executive Board is responsible for the compliance function. The CFO, member of the executive board, oversees all compliance matters, regularly informs the Audit Committee, and maintains close collaboration with the Chief Compliance Officer.

The **Chief Compliance Officer of AIXTRON Group (CCO)** identifies and manages compliance risks and ensures AIXTRON has an effective CMS including Compliance Code of Conduct. The CCO reports regularly to the CFO, Audit Committee and independently to its Chair.

The **Compliance Office of AIXTRON Group** oversees the implementation, maintenance and communication of the CMS including Compliance Code of Conduct and its tools, supporting all levels of the compliance organization. It is the first point of contact for compliance matters and consists of the CCO and the Senior Department Manager Corporate Governance & Compliance.

The Compliance Office can be reached via **compl-office@aixtron.com**.

The members of the **Senior Management Team**, and **managers** act as role models and actively promote compliance and ethical behavior – in other words, by acting in a manner that demonstrates what it means to act with

integrity. They ensure that our workforce understands and complies with all of the requirements of AIXTRON's rules and regulations, including Compliance Code of Conduct. They monitor compliance with the Compliance Code of Conduct among the employees they lead, and they support employees who raise questions or concerns in good faith.

All **AIXTRON employees**, regardless of position, adhere to our compliance rules and regulations in their daily decisions and actions. The employees are responsible for reporting known or suspected violations through designated channels.

¹ Employees including temporary employees, contractors, advisors, anyone representing AIXTRON.



AIXTRON's Compliance Code of Conduct



Our Compliance Code of Conduct is a guide for our actions and decisions in our daily business. The Compliance Code of Conduct cannot address every conceivable compliance relevant issue. But it will help us to make decisions in compliance with legal, regulatory and ethical standards. Additionally, compliance relevant topics and principles of conduct are set out in detail in the compliance manuals of AIXTRON SE, of the AIXTRON subsidiaries and in additional compliance rules and regulations. In addition to the Compliance Office, the members of the Senior Management Team and selected executives have access to the AIXTRON SE's Compliance Manual and are available to answer questions.

Our Compliance Code of Conduct guides us to ensure that we act in line with our core values and expectations. Every individual working for our company is required to adhere to the principles, rules and regulations and behaviors outlined in our Compliance Code of Conduct and all other compliance rules and regulations, making them a part of daily actions and decisions. Additionally, participation in compliance training is mandatory and must be completed in a timely manner.

What are the consequences of violating our Compliance Code of Conduct?

Violations of the principles and rules outlined in our Compliance Code of Conduct and other compliance requirements may result in disciplinary action under employment law, including a possible termination of employment. In addition, individuals may face administrative fines or criminal penalties, such as fines or imprisonment. If a compliance violation causes damage to AIXTRON, those responsible may be held liable for compensation.

All managers are responsible for ensuring compliance in their area of responsibility and may face consequences if violations occur due to inadequate supervision.

We do not tolerate any compliance violations – whether within AIXTRON SE and its subsidiaries, or beyond company boundaries. To protect our long-term sustainable success and our global reputation, we investigate both actual and suspected violations thoroughly and take appropriate action.



The Compliance Code of Conduct and other relevant compliance requirements can be found in our **Corporate Governance & Compliance Portal**.



In case of any questions regarding the Compliance Code of Conduct or any other compliance related topic please contact **compl-office@aixtron.com** for further guidance and support.



Principles that unite and guide us

Our shared responsibility for a positive workplace

Equal treatment and trusting cooperation

As an international company, we consider equal treatment and diversity fundamental to our corporate culture, as we believe that respect, inclusion, and fairness are essential to a thriving and innovative workplace. We are committed to promoting an environment that values the unique backgrounds, perspectives and talents of all our employees. Our goal is to ensure equal opportunities in recruitment, employment and professional development for everyone regardless of gender, color, religion, marital status, age, national origin, physical or mental ability or other characteristics. Discrimination, intimidation, bullying or harassment of any kind has no place in our organization and will not be tolerated.

We practice mutual respect, team spirit, and trust among ourselves and with our business partners.

Within our company and in our business relationships, we respect internationally recognized human rights and comply with applicable legal requirements. Forced labor, slavery, human trafficking and child labor are prohibited and have no place in our business activities or business relationships.

Management and supervisory duties

Our members of the Senior Management Team and other managers promote our compliance culture. They act as role models by consistently upholding our compliance standards and principles of conduct, acting with integrity and free from any personal conflicts of interest.

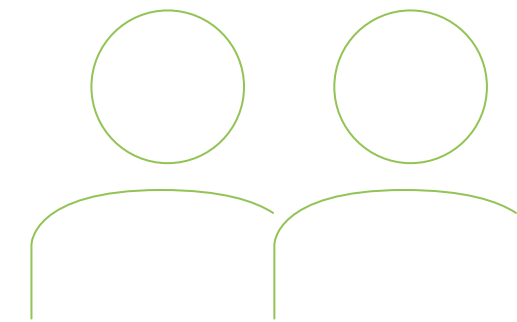
Leading by example, our managers demonstrate respect towards employees and business partners and promote a sense of unity within their teams and across the organization.

Managers are bound by their duty of supervision to:

- Carefully select and further qualify employees with regard to their personal and professional suitability (selection obligation);
- Issue precise, complete and binding instructions, in particular with regard to adherence to compliance requirements (duty to issue instructions);
- Point out that compliance violations will not be tolerated (duty to inform about sanction);
- Monitor adherence to compliance requirements on a continual basis (monitoring obligation).

Example

A team member consistently interrupts a colleague during meetings and dismisses their ideas. This behavior undermines mutual respect and violates our commitment.



Correct action

Managers should address the behavior promptly, reinforce respectful communication, and ensure all voices are heard.

Protecting our people and planet at work

We share a collective responsibility to protect people and the environment, minimize environmental impact, use natural resources responsibly and maintain a secure waste management system. All operational procedures, facilities and equipment must comply with the applicable legal, regulatory and internal requirements for occupational safety, health protection, fire safety and environmental protection.

We are committed to providing fair, respectful, and safe working conditions for all employees. This includes compliance with labor laws, fair compensation, reasonable working hours, and the right to rest and recovery. The health and safety of our employees in the workplace is our highest priority.

The safety and health of our employees are equally important corporate objectives, alongside delivering high-quality products and ensuring sustainable corporate success. Occupational health & safety, fire protection and environmental care are embedded in our daily activities and all operational processes. Every employee contributes by promoting these principles in their work environment and adhering to the associated rules and regulations.

In accordance with supervisory responsibilities, every manager is required to actively guide, support and monitor their employees in fulfilling all these obligations. The same standards apply to third parties working at AIXTRON as they do for our employees.

Special attention is given to the handling of hazardous substances: Before use, each substance must be approved by the responsible departments, undergo a risk assessment, and have clearly defined procedures – including emergency response measures and safe disposal protocols. Employees must be regularly trained on potential risks and safe handling practices before and during the use of hazardous substances.

Avoiding conflicts of interest

All employees and individuals working for or representing AIXTRON are expected to make business decisions solely in the best interests of the company. Potential conflicts of interest, whether personal or involving relatives, close associates, or external organizations must be identified and avoided from the outset.

Potential conflicts of interest may arise in the following situations, for example:

- When accepting a secondary employment or running your own business;
- When hiring a relative on a direct reporting line or in the same organizational unit;
- Holding a financial interest in a supplier, customer or competitor.

The Compliance Office must be informed immediately of any potential and/or existing conflicts of interest. Transparent disclosure of the facts is an essential prerequisite for an appropriate solution.



Protection of AIXTRON's assets

We use the company's assets and resources economically, appropriately and carefully. We protect them against waste, loss, theft and misuse. Our assets include, for example: buildings, equipment, technical infrastructure, products, hardware and software, such as mobile devices (tablets, smartphones or similar), stationary devices (printers, plotters, scanners), access to the internet and e-mail system, landline/mobile phones and all other assets that the company provides to carry out its business activities.

We generally use company assets for company purposes and not for personal purposes. Availability, integrity, and security of company assets must be always safeguarded.

In cases where personal use is permitted, employees are required to comply with the relevant guidelines and terms of use associated with those assets. Any use for personal purposes must be appropriate in relation to business purposes.



Compliance essentials

- We value diversity, uphold equal opportunity, and do not tolerate discrimination. We respect human rights and comply with applicable legal requirements.
- Our managers embody our compliance culture by acting with integrity, guiding their teams responsibly, and ensuring that rules are clearly communicated, respected, and consistently enforced.
- All individuals working for AIXTRON must, for their own protection and for the protection of the company, know the emergency procedures and act accordingly in their daily work environment.
- Private interests of any kind and the interests of AIXTRON must be kept strictly separate.
- We use company assets responsibly and protect them from misuse, principally for business purposes, with limited personal use only when permitted by company policy.



Our standards for cooperation with business partners

Selection of our business partners

Before engaging new business partners, such as suppliers, service providers, sales partners, or customers, we conduct a risk-based integrity assessment. This includes for example screening against applicable sanctions lists. When selecting business partners, our employees are required to conduct a thorough evaluation within the legally permissible framework and in line with internal company policies. The assessment must be documented clearly and filed systematically. During this process, it must be ensured that potential business partners commit to complying with all applicable legal and regulatory requirements, as well as our internal standards and principles of responsible corporate governance.

As business relationships continue and contracts are managed, we expect our business partners to consistently adhere to both external and internal requirements. We expect our business partners to respect human rights, comply with applicable environmental standards and avoid forced labor, child labor, human trafficking and other serious misconduct.

We address related risks through appropriate, risk-based due diligence and contractual requirements.

We build partnerships based on trust and shared values, ensuring that our business relationships reflect our commitment to ethical conduct and mutual respect. Therefore, business partners are required to align their actions with our values, regularly reflect on them, and communicate our principles of responsible corporate governance and the related obligations to their own employees and business partners.

The following standards can be used for communicating AIXTRON's requirements and values:

- Our Compliance Code of Conduct;
- Our Supplier Code of Conduct;
- Our terms and conditions of purchase;
- Our sales conditions;
- Our principles, published on the AIXTRON's homepage.

The selection of business partners and related contract management may only be carried out by employees responsible for the relevant area, and only within the scope of their defined and authorized authority. These activities must always be conducted in the best interests of the company and free from any personal interests. Any actual or potential conflicts, regardless of which party they concern, must be reported to the Compliance Office immediately.

Prevention of corruption and bribery

Corruption is the abuse of entrusted power or authority by individuals or a group of people for one's own enrichment. Bribery is the giving (active bribery) or receiving (passive bribery) of economic or non-economic benefits of any kind (contributions) that influence the actions or decisions of individuals or a group of individuals. This benefit improves the personal situation of the recipient, although the recipient is not entitled to this benefit.

In order to combat corruption and bribery in global competition, many countries have enacted comprehensive laws and regulations. We are fully committed to complying with these international and national regulations, ensuring that our daily actions and business consistently reflect these standards.

Before offering or accepting any form of benefit, such as gifts, hospitality, meals, travel, accommodation or invitations, we must carefully assess whether it is appropriate. These types of gestures may be acceptable in certain cultures and business environments to maintain business relationships. We respect local cultures and customs as long as the benefits offered or accepted are not lavish or excessive and fully comply with legal, regulatory and our internal requirements.

Such benefits must not be perceived as bribery, undue influence on business decisions or as personal advantage for the recipient.

Our corporate values strictly prohibit these practices, and violations will not be tolerated.



Benefits directed to private addresses may not be granted or accepted and are considered corrupt behavior. AIXTRON does not tolerate any kind of corruption.

In order to maintain and continuously expand our economic position and positive reputation in global competition, we pursue an approach of fair and transparent business relationships. This is the only way we can:

- Promote the trust of interested parties in our company;
- Maintain and continuously improve our reputation and profitability;
- Ensure our sustainable corporate success;
- Be proud of our company and our values.

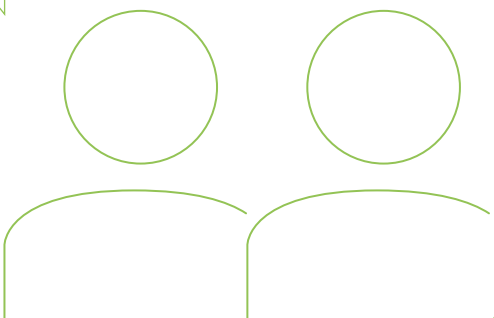
If you have any questions or uncertainties regarding potential corruption or bribery, please reach out to your line manager, members of the Senior Management Team and/or the Compliance Office immediately. All are available to offer guidance, clarify concerns, and support you in making informed decisions.



Further guidance on fair and transparent business conduct is outlined in our Group-wide **Anti-Corruption Guideline**. We encourage everyone to familiarize themselves with its provisions and to apply them consistently in their daily work and decision-making.

Example

What should you do if you are offered or accept a gift or benefit?



Correct action

Ask yourself: is it modest, culturally appropriate, and aligned with company policy? If unsure, consult your line manager and/or the Compliance Office before accepting.



Prevention of money laundering

We fully comply with all legal and due diligence obligations to prevent money laundering and do not participate in such activities. To ensure this, we organize and conduct all business and transactions worldwide with clear structures, verified business partner identities, and transparent supply and payment chains. All business transactions are thoroughly documented, and all payments are made by bank transfer.

Any unusual financial transactions, especially those involving prohibited payment methods or raising suspicion of money laundering, must be reported through our internal reporting channels.

As an international company, we also observe all national and international economic sanctions and comply with all relevant laws.

Antitrust law and competition

A well-functioning and unrestricted competitive environment is a fundamental pillar of global markets, ensuring that customers and consumers have access to innovative products at fair prices. The primary objective of antitrust and competition law is to safeguard and strengthen fair, dynamic and effective competition for the benefit of consumers and promoting market efficiency. The laws regulate agreements, business practices and mergers between companies, and set specific obligations for companies with significant market power. Furthermore, the formation of cartels must be avoided and are strictly prohibited.

As an international company, we benefit from fair and well-functioning competition, which also protects us from unlawful agreements and excessive prices within our supply chain. Our company and its executive bodies are firmly committed to upholding fair competition and complying with all applicable antitrust and competition laws. We expect the same level of commitment from all individuals working on behalf of our organization.

In case of uncertainty regarding antitrust law and competition please contact your line manager, members of the Senior Management Team and/or the Compliance Office for advice and/or assistance.



Foreign trade

We operate in global markets with highly advanced technologies and products, often accompanied by intangible assets such as technical know-how, production methods and software or data processing tools. Many of these can be used in both the civilian and military contexts, which is why some of our technologies, products and intangible assets are classified as dual-use goods. Strict compliance with international and national export control regulations is essential to our commercial success and legal responsibility across the entire supply and value chain.

Export controls apply not only to the physical shipment of our goods, but also in certain cases to the transfer of technical documents, knowledge and even the signing of contracts. To ensure compliance, we engage in global trade under export licenses that are subject to regular monitoring.

The constantly evolving geopolitical environment through embargoes and sanctions targeting specific countries, individuals, groups, or goods can significantly impact our global operations. These developments are continuously tracked and assessed by our export control organization to mitigate risks and ensure lawful conduct.

In addition to the legal requirements for export control, the customs regulations for the country of destination are of equal importance to our global trade operations.

While our export and customs team closely monitors the geopolitical and regulatory environment, each individual shares a responsibility for adhering to all applicable legal, regulatory and internal requirements.

Violating legal requirements and disregarding embargoes and sanctions represent serious risks – not only to our reputation and operations, but potentially to the continued existence of our company.



Compliance essentials

- Before engaging any new business partner, we conduct a documented, risk-based integrity assessment to ensure compliance with legal, regulatory, and internal requirements and require our business partners to uphold our values and principles throughout the business relationship.
- We uphold fair, transparent, and compliant business practices by rejecting all forms of corruption and bribery, carefully assessing any offered or received benefits, and consistently aligning our actions with legal, regulatory and internal requirements, and our corporate values.
- We prevent money laundering by ensuring transparent, well-documented business transactions, only accepting bank transfers, and strictly complying with all relevant laws, sanctions, and internal controls worldwide.
- Fair competition is everyone's responsibility, by following antitrust laws and acting with integrity, we protect our company, our stakeholders, and the markets we operate in.
- Our global operations rely on strict export and customs compliance for dual-use goods, where every transfer, physical or intangible, must align with evolving regulations to protect our business and uphold legal responsibility.

Our expectation to honest and transparent interaction in our daily business activities

Interaction within the company and with our business partners

Open, objective and value-driven communication is a cornerstone for our corporate culture, and we actively foster it at all levels of the organization. This kind of communication is used within our company and in collaboration with business partners to enable the exchange of information, the transfer of knowledge, effective coordination and the building of trust. We promote a culture of respectful and motivating communication and we firmly reject any form of discriminatory and disrespectful interaction. Communication includes not only spoken interactions but also written correspondence, such as e-mails, chat messages and letters.

Feedback plays a key role in effective communication, especially as a core element of leadership responsibility. A culture of timely, respectful and constructive feedback strengthens collaboration, enhances understanding, and contributes to a positive working environment and strong business relationships. Transparent communication is a reflection of our value of accountability – ensuring that our word can be relied upon.

Interaction with public and official bodies

We are proud to share our market-leading technological achievements and the outstanding work behind our company's development with the public. To ensure the success of our external communication, we adhere to key principles that reflect our values and commitment to excellence:

With authorities

- For official inquiries, we always refer to our responsible offices, such as the AIXTRON representative, which are published on the AIXTRON intranet;
- In the event of unannounced official visits and/or investigations, the Executive Board, the legal department, the Compliance Office and the responsible member of the Senior Management Team must be informed immediately.

With public and media representatives

- For inquiries from public media, journalists, or trade publications, we refer to our public relations department – Investor Relations & Corporate Communication – and to the official contact e-mail listed on the AIXTRON homepage.

At conferences and working groups

- Speaking at conferences or participating in working groups requires prior approval from the responsible member of the Senior Management Team. Confidential business information must always be protected from unauthorized disclosure.

If you have any questions regarding the external communication, please contact your line manager.

Interaction with the capital market

Capital markets are global financial platforms where buyers and sellers come together internationally. AIXTRON's shares are listed on the regulated market of the German Stock Exchange and are included in numerous national and international investment funds. These circumstances demand a high level of diligence in capital market communications, trading in financial instruments² and fulfilling legally required reporting obligations, especially regarding insider information, which refers to non-public information that, if disclosed, could significantly impact the market price of financial instruments.

To ensure proper interaction with the capital market we all must keep the following things in mind:

- When contacted by investors, analysts, banks, investment companies or similar institutions, we consistently direct all inquiries to our responsible Investor Relations team via the official e-mail address listed on the AIXTRON homepage;
- Through established processes and instruments, we ensure that all legally required reporting obligations are clearly understood and consistently complied with;
- Trading in financial instruments relating to AIXTRON or its business partners is permitted only in compliance with all applicable legal, regulatory and internal requirements, in particular those relating to insider information and restricted trading periods.

Therefore, it is **strictly prohibited** to:

- Use insider information to buy or sell financial instruments, whether for personal gain or on behalf of another person;
- Disclose or make insider information accessible to any person or entity without proper authorization;
- Recommend or encourage a person or entity to buy or sell financial instruments based on the insider information.

Please do not hesitate to contact your line manager and/or the Compliance Office, when you find yourself in an unclear situation and need assistance regarding communication with capital markets and insider information.



Our group-wide **Insider Policy** outlines detailed requirements and behavioral expectations for proper interaction with the capital markets, including reporting obligations, trading in shares and other financial instruments, and the handling of insider information. We encourage every person to familiarize themselves with our Insider policy and to consistently apply its principles in their daily actions and decision-making.



² Financial instruments may be: shares and certificates representing shares, bonds, profit participation certificates, warrants, certificates, investment fund units.



Reporting obligations

We report comprehensively to the capital market, covering our financial position, performance and net assets. Alongside financial disclosures, sustainability reporting – based on defined criteria and key figures in the areas of economy, ecology and society – is gaining importance. In addition to these quarterly and annual reports, we also fulfil reporting obligations to authorities, banks and insurance providers.

As a matter of principle, we are committed to open and truthful reporting of our business activities, in full compliance with national and

international regulations. Our reporting not only addresses representatives of the capital market, but also serves the public, regulatory authorities, business partners and our employees.

To ensure legal compliance, accuracy, and completeness in our reporting, we have embedded control and monitoring mechanisms within our group-wide Internal Control System.

Our group-wide **Code of Ethics** defines further principles and rules of conduct that are binding for all employees involved in reporting.



Compliance essentials

- We communicate openly and respectfully within our company and with all relevant stakeholders.
- We proudly share our technological leadership transparently with the public, while ensuring all external communications, whether with authorities, media, or at public events, adhere to defined approval processes and safeguard confidential information.
- As a company active in global capital markets, we share the responsibility to communicate transparently, trade responsibly, and handle insider information with care, guided by clear processes and our Insider Policy.
- We are committed to transparent, accurate, and responsible reporting—financial and non-financial—guided by principles in our Code of Ethics and supported by internal controls.



Our commitment to sustainable corporate management

We understand that economic, ecological and social activities are interconnected and influence each other in meaningful ways. For AIXTRON sustainable corporate management includes compliance with applicable legal requirements and the integration of relevant environmental and social considerations into business decisions, where appropriate. It reflects a long-term approach to integrating relevant sustainability aspects into our strategy, operations and business relationships. In our business decisions, we consider relevant environmental and social aspects alongside long-term economic objectives, taking into account risk, materiality and applicable requirements. We seek to identify and address relevant human rights and environmental risks in our operations and, where appropriate, in our supply chain through defined policies and processes. We systematically identify and assess related risks and opportunities – including their social and environmental impacts.

We seek to reduce relevant environmental impacts in our operations and business activities through compliance, responsible resource use and continuous improvement. We aim to manage environmental impacts responsibly and to support our internal environmental objectives.

We encourage all employees to contribute by acting responsibly, identifying opportunities for improvement, and supporting our environmental goals in their daily work. Our approach is based on long-term thinking and responsible business conduct.



Additional principles, regulations and practices that reflect our commitment to sustainable corporate responsibility are outlined in the following documents:

- ESG Policy;
- Policy statement on human rights and environmental strategy;
- Supplier Code of Conduct;
- Diversity statement;
- Global Employment Standards.

We encourage everyone to familiarize themselves with these documents and to incorporate the outlined principles and behaviors into their daily actions and business decisions.



Compliance essentials

- We consider relevant environmental and social aspects in our business activities and follow the applicable laws, internal policies and processes.



Our role in the world around us

As a responsible international company, we are committed to making a positive impact beyond our core business and aspire to be recognized as a trustworthy and socially conscious organization. Therefore, we support and welcome:

Voluntary commitment of our employees

- Volunteering is an important pillar of cohesion in our society. We welcome the voluntary commitment of our employees. When carrying out voluntary work, employees must ensure that:
 - They clearly express that their opinions or actions are personal and not made on behalf of AIXTRON;
 - They consult Human Resources and the Compliance Office before accepting any voluntary role that may impact their professional duties or conflict with AIXTRON's business interests;
 - They inform the Human Resources Department and the Compliance Office if elected or appointed to a public office.

Donations

- As an active member of society, we contribute in various ways to support social causes. All donations and similar forms of social engagement are made in alignment with AIXTRON's values. Any donations made on behalf of the company (in cash, in kind or services) and comparable activities require prior approval from the Executive Board.

Memberships and lobbying

- We fully comply with all legal requirements related to lobbying and are committed to maintaining transparency and integrity in our interactions with political and legislative bodies.



Compliance essentials

- We support our employees' civic engagement and ensure that all forms of social contribution, whether through volunteering, donations, or public affairs, are carried out responsibly and in alignment with our company values.

Our way of protecting what matters: secure handling of information

Principles of information security

As technology leaders in our field, we operate at the very start of the value chain for both national and international customers in the semiconductor industry. This strategic position means that our daily work is of significant interest to third parties including customers, suppliers, competitors or even industrial espionage. To safeguard business and trade secrets – as well as the associated confidential information – we have implemented an Information Security Management System (ISMS) certified according to the international standard ISO/IEC 27001. This ISMS is built on four foundational pillars:

Organizational security

- Protection of information through structured processes, clear documentation and consistent compliance in daily operations.

Stakeholder security

- Protection of information by fostering awareness and diligence among our employees and all people working on our behalf.

Physical security

- Protection of information through physical measures in our infrastructure.

IT security

- Protection of information through technical measures in our IT landscape.

Every employee is responsible for handling all work-related information securely and with care. Our ISMS, based on defined principles, policies and behaviors, outlines how this should be done. We expect all employees and all individuals working on our behalf to read and follow these ISMS guidelines in their daily work and business decision-making. This applies either on company premises, when working off-site, during business meals, in public telephone calls, as well as on business trips and in the private environment. Only by acting responsibly together, we not only maintain and strengthen our position as a leading technology company with a strong global reputation but also protect our employees, all individuals working on our behalf and business partners.

Business and trade secrets

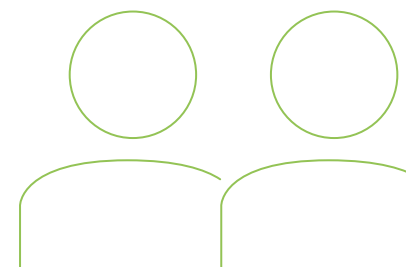
Business and trade secrets are confidential information that is not publicly accessible, and that must be protected at all times. We treat confidential information from business partners or other stakeholders with the same level of care and protection as our own.

All employees and individuals representing AIXTRON must ensure that confidential information is not disclosed to unauthorized individuals, including family and friends.

Any disclosure – whether written, verbal, electronic or otherwise – requires prior approval from the responsible individual. Every employee and individual representing AIXTRON is responsible for preventing unauthorized access to confidential information. If you are unsure whether any information is confidential, please contact your line manager. For further support, our Information Security department is available to assist with any questions relating to information security.

Example

What should you do if you're unsure whether an information is confidential?



Correct action

Treat it as confidential until confirmed otherwise. Contact your line manager and/or the Information Security department for guidance.



Personal data

Our employees, customers, business partners, shareholders and other stakeholders entrust us with a wide variety of personal data. We recognize the high sensitivity of this personal data and handle it with care and confidentiality, in line with legal, regulatory and internal requirements. To ensure this, we implemented a variety of technical and organizational measures to protect personal data. Every employee and individual representing AIXTRON is responsible for maintaining a high level of data protection in their daily work.

Further principles, policies and procedures for protecting personal data are set out in our Data Protection Management System. We expect all employees and individuals working on our behalf to familiarize themselves with these policies and to apply the outlined practices in their daily work and decision-making.

Digitalization and internet services

As digitalization advances, new technologies and tools are transforming our work processes, creating added value for our company, employees and stakeholders. These innovations open new opportunities, which we are committed to using responsibly.

Our internet services are also continuously evolving. Alongside access to company systems such as the internet, intranet, email system and technologies for using artificial intelligence are becoming increasingly important – especially in automating the processing of large data volumes. While these developments offer significant opportunities, we are also aware of the risks associated with digital handling of confidential and personal data. We address these risks through targeted technical and organizational measures to ensure secure and responsible data processing.

Therefore, we encourage the use of technologies, internet services and artificial intelligence tools only under the following conditions:

- No improper use and no violation of legal, regulatory or internal requirements;
- Only approved artificial intelligence tools, according to our AI Whitelist, which can be found on the intranet, may be used.

Additional guidelines and specifications on digitalization and internet services – such as the “Use of Internet/AI Services” policy – are part of our Information Security Management System.



Social networks

Social networks play an increasingly important role in public communication.

As a company, we use these platforms through our responsible departments to engage with stakeholders, for example in recruitment or announcing company news.

When using social networks, we respect the privacy of our employees. We do not tolerate inflammatory, offensive or discriminatory content. This includes, for example, posts that:

- Jeopardize the harmony within our organization;
- Damage the reputation of our company and/or our employees;
- Strain relationships with key stakeholders (e.g. customers, suppliers, shareholders);
- Associate our company or employees with political opinions or statements.

No employees or other unauthorized individuals are permitted to publish content related to our company on social networks, whether in their private area or in comparable environments/forums.



Compliance essentials

- Each of us plays a vital role in protecting confidential information and our ISMS guides us in safeguarding our company's strategic position through secure, responsible behavior every day.
- It's up to each of us to protect confidential information, ours and our business partners'. Never share it without approval.
- Each of us is trusted with personal data, ours, our customers', and our business partners', and it's our responsibility to protect it with care, follow the rules, and apply our data protection policies in everything we do.
- We use digital tools and approved AI responsibly, ensuring secure data handling and compliance with all legal and internal requirements.
- We use social media responsibly, ensuring only authorized communication and rejecting any content that harms our company, people, or values.

Our standards for products and services

Principles of product safety

Our products use technologies and materials that can pose a risk to users and the environment during manufacturing, installation and operation. That's why product safety is a top priority – alongside strict compliance with international and national regulations. To uphold this commitment, we have embedded a wide range of control mechanisms throughout research, development and our entire value chain, right up to customer handover. We also continuously monitor our technologies and products in the field to identify and counteract potential risks early, ensuring sustainable improvement and further development.

Principles of our quality promise

Outstanding quality is one of our greatest strengths and a key pillar of our long-term success.

For us, quality means more than just providing safe, compliant and reliable technologies – it's about consistently meeting the expectations and needs of our customers, business partners and further stakeholders in a sustainable way.

Our quality promise comprises two key success factors:

- Timely delivery of safe, reliable and high-quality products – alongside with customer-specific services;
- Strong, cooperative relationships based on trust and openness, with our customers, business partners and other stakeholders we work with.

Handling of intellectual property and technical knowledge

As a technology leader, we own numerous patents, trademarks, and other intellectual property rights and these are among our most valuable assets and essential to our ability to compete and innovate. We protect them rigorously across all areas of our business.

At the same time, we respect the intellectual property of others and only use third-party content, when we have the appropriate rights or permissions. Unprotected knowledge of third parties may only be used if no legal restrictions apply. Any knowledge covered by a confidentiality agreement must be handled strictly in accordance with those terms. In principle, the use also includes the sharing – so any disclosure must also follow these terms. Knowledge of confidential technological information and processes acquired during employment – whether our own or those of others – must always be kept secret, even after termination of employment from our company.

Our employee's creativity is a key driver of our sustainable innovation – and we actively support and encourage it. We protect employee inventions in accordance with local legal requirements.



Compliance essentials

- We prioritize product safety by embedding strict controls across our value chain and continuously monitoring risks to protect people and the environment.
- We deliver outstanding quality through reliable products and trusted partnerships that meet customer needs sustainably.
- We protect all intellectual property and encourage employee creativity as a key driver of innovation.



AIXTRON's reporting channels



AIXTRON's reporting channels

Every individual working for our company is encouraged and required to immediately report any compliance violation or even a suspected issue within our company or involving our business partners.

You can report concerns to your line manager and/or the responsible member of the Senior Management Team in your local working environment.

If you prefer not to raise the issue locally or do not receive appropriate support, you can contact the Compliance Office via:
compl-office@aixtron.com.

All reports to the Compliance Office are treated confidentially.

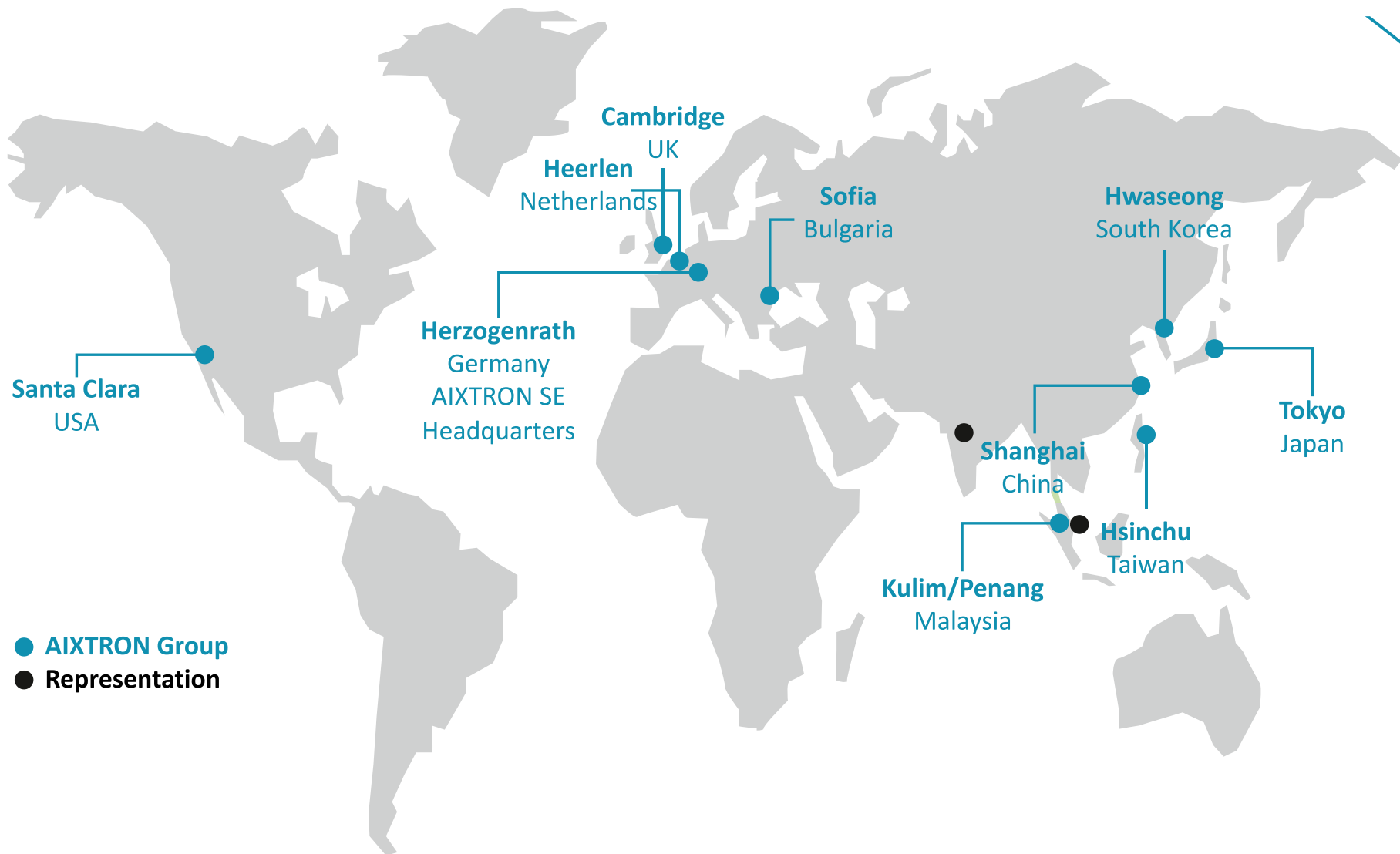
We have established a confidential whistleblowing hotline for reporting compliance violations. Reports can be submitted directly to AIXTRON's Chairman of the Supervisory Board via e-mail at ***sb@aixtron.com***.

Additionally information is outlined in ***AIXTRON's Whistleblowing Policy*** – we encourage every employee to read it and follow its guidance in their daily work.

Anyone who reports a compliance concern is protected from retaliation (Protection of Whistleblowers). Retaliation by AIXTRON or its employees is a serious violation and will not be tolerated.

Knowingly submitting false or malicious reports is prohibited and may result in disciplinary or legal action.

AIXTRON



- AIXTRON Group
- Representation

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