

Supplier Code of Conduct of AIXTRON SE

1 Introduction

This Code of Conduct applies to all suppliers who provide products or services to AIXTRON SE or its Group companies (AIXTRON).

Our suppliers are obliged to comply with the laws of the applicable legal system(s). The requirements of the Supplier Code of Conduct must be promoted and enforced to the best of our ability both within our own company and along the entire supply chain. Our direct and indirect suppliers undertake to comply with the principles and requirements of the Code of Conduct and to endeavor to contractually oblige their subcontractors to comply with the standards and regulations set out in this document.

With regard to supply chains, we expect our suppliers to identify human rights and environmental risks in particular and to take appropriate mitigating measures. In the event of suspected violations and to safeguard supply chains with increased risks, the supplier will inform AIXTRON promptly and, if necessary, regularly about the violations and risks identified, the measures taken and the progress made.

2 Principles and requirements

Compliance with laws and regulations

We expect our suppliers to comply with all applicable laws, rules and regulations and to take appropriate measures to ensure compliance with these laws, rules and regulations.

The Code of Conduct is based in particular on national laws and regulations such as the German Supply Chain Duty of Care Act (LkSG) and international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on the Rights of the Child and Business Conduct, the United Nations Guiding Principles on Business and Human Rights, the International Labor Standards of the International Labor Organization and the United Nations Global Compact.

The standards set out in this Code of Conduct form the basis for business relationships with our suppliers. The principles contained represent minimum standards. The national and other relevant laws and regulations that apply in the countries in which business activities take place and the principles contained in this Code of Conduct must be complied with. Of all applicable regulations, the one that is best suited to achieving the purpose of protection is always decisive.

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Respect for human rights and working conditions

Ban on forced labor

Any form of forced labor, servitude, involuntary prison labor or human trafficking is prohibited.

Employees must be able to leave work or the employment relationship at any time. In addition, there must be no unacceptable treatment of employees, such as psychological hardship, sexual and personal harassment and humiliation.

The commissioning or use of security forces is prohibited if persons are treated or injured in an inhumane or degrading manner or if freedom of association is impaired.

Ban on child labor

There is no use of child labor as defined by ILO and UN conventions and/or national law.

The right of children to education is respected. This means that it is prohibited to employ children who have not yet reached the age at which compulsory schooling ends according to the law of the place of employment, provided that the age of employment is not less than 15 years.

Children and young people under the age of 18 are not employed at night or under dangerous working conditions.

Fair remuneration

The remuneration of employees must comply with all applicable national remuneration laws, including laws on minimum wage and overtime. Remuneration must be set at a level that enables employees to participate in social, cultural and political life.

Wages must be paid on time, regularly and in full. Deductions from wages as disciplinary measures shall not be permitted, nor shall deductions be made from wages that are not permitted by national legislation without the express consent of the worker concerned.

The supplier must ensure that employees receive clear, detailed and regular written information on the composition of their pay.

Fair working hours

Working hours must comply with applicable laws and/or industry standards. Overtime is only permitted if it is voluntary and does not exceed 12 hours per week. Employees must be granted at least one day off after six consecutive working days. The weekly working time may not regularly exceed 60 hours and/or the maximum weekly working time applicable under the law of the place of employment.

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Freedom of association

Workers have the right, without exception, to organize and form a union or join a freely chosen union and to bargain collectively and strike. Forming, joining and being a member of a trade union shall not constitute grounds for unjustified discrimination or retaliation. Employee representatives are not discriminated against and have the opportunity to carry out their representative functions in the workplace. Employee representatives must also be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner.

In cases where freedom of association and the right to collective bargaining are restricted by law, alternative possibilities for independent and free association of employees for the purpose of collective bargaining must be granted.

Prohibition of discrimination

The personal dignity, privacy and personal rights of each individual are respected. Discriminatory unequal treatment of employees in any form is therefore inadmissible unless it is justified by the requirements of the employment.

There is no discrimination in recruitment, remuneration, admission to training and further education, promotion, termination of employment or retirement on the basis of ethnic origin, social origin, race, caste, nationality, health status, disability, sexual orientation, age, gender, marital status, trade union membership or political affiliation, political opinion, religion or belief.

Occupational health and safety

The supplier is responsible for a safe and healthy working environment. By setting up and applying appropriate occupational safety systems, necessary precautionary measures are taken against accidents and damage to health that may arise in connection with the activity.

Excessive physical or mental fatigue must be prevented by taking appropriate measures, such as sufficient rest breaks. In addition, employees must be regularly informed and trained on applicable and industry-standard health and safety standards and measures. Every employer must take appropriate protective measures to prevent employees from being exposed to chemical, physical or biological substances.

Employees are given access to sufficient quantities of drinking water and clean sanitary facilities.

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Additional human rights standards

Suppliers are also prohibited from, among other things:

- To cause harmful soil degradation, water pollution, air pollution, harmful noise emissions or excessive water consumption if this affects the natural basis of life or the health of a person.
- The unlawful eviction or deprivation of land, forests and water, the use of which secures a person's livelihood.
- Use private and public security forces if this threatens to violate human rights, including the right to freedom of association.
- Other conduct that may seriously violate human rights.

Ethical business practices

Prohibition of corruption and bribery

Any form of corruption or bribery will not be tolerated. The Supplier must ensure that AIXTRON employees do not obtain or accept any unauthorized personal benefits in connection with their business activities. Only gifts below a de minimis limit of EUR 20 are permitted. Cash payments to our employees are prohibited without exception. Invitations to our employees to business trips, plant trips, leisure events or other events must be approved in advance by the Executive Board of AIXTRON SE or the Compliance department. Invitations to business meals are exempt from the approval requirement, provided that they serve a legitimate business purpose and the nature and scope of the expenses are reasonable.

Avoidance of conflicts of interest

As a supplier to AIXTRON, we avoid situations in which our own interests conflict with the business interests of AIXTRON. AIXTRON must be informed immediately if a conflict of interest becomes known.

Fair competition, compliance with competition and antitrust law and intellectual property

AIXTRON complies with the applicable rules of competition and antitrust law and the principle of fair competition and expects the same from its business partners. In dealings with competitors, applicable antitrust laws prohibit in particular agreements and other activities that influence prices or conditions, as well as agreements between customers and suppliers that are intended to restrict customers in their freedom to determine their prices and other conditions for resale. AIXTRON disapproves of such practices and expects the same from its business partners. In addition, AIXTRON's suppliers undertake to respect intellectual property rights.

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Export controls and economic sanctions

The supplier of AIXTRON strictly observes compliance with all applicable regulations and laws for the import and export of goods, services and information as well as payment transactions. In its business activities, existing sanctions and embargoes are observed within the framework of the laws and regulations.

Prevention of money laundering and terrorist financing

The Supplier of AIXTRON undertakes to comply with its legal obligations to prevent money laundering and terrorist financing within the framework of the applicable legal provisions and not to promote these either directly or indirectly.

Environmental protection and sustainability

Environmental protection laws

The supplier complies with the relevant environmental protection laws and regulations. Its operations comply with the requirements of waste legislation and immission and water protection.

The business partner shall comply with all regulations relating to hazardous substances. This applies in particular to the storage, handling and disposal of hazardous substances. Employees must be instructed in the handling of hazardous materials and substances.

Treatment and discharge of industrial wastewater:

Wastewater from operational procedures, production processes and sanitary facilities must be typified, monitored, checked and, if necessary, treated before discharge or disposal. In addition, measures should be introduced to reduce the generation of wastewater.

Dealing with air emissions:

General emissions from operations (air and noise emissions) and greenhouse gas emissions must be typified, routinely monitored, checked and, if necessary, treated before they are released.

The supplier also has the task of monitoring its exhaust gas purification systems and is required to find economical solutions to minimize any emissions.

Handling waste and hazardous substances:

The supplier follows a systematic approach to identify, handle, reduce and responsibly dispose of or recycle solid waste.

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Chemicals or other materials that pose a risk if released into the environment must be identified and handled in such a way that safety is ensured when handling, transporting, storing, using, recycling or reusing and disposing of these substances.

Mercury shall be used in accordance with the prohibitions of the Minamata Convention of October 10, 2013 and chemicals and persistent organic pollutants shall be used in accordance with the Stockholm Convention of May 23, 2001, as amended.

The bans on the export of hazardous waste in the Basel Convention of March 22, 1989, as amended, must be observed.

Reduce consumption of raw materials and natural resources:

The use and consumption of resources during production and the generation of waste of any kind, including water and energy, must be reduced or avoided.

This is done either directly at the point of origin or through processes and measures, e.g. by changing production and maintenance processes or procedures within the company, by using alternative materials, by making savings, by recycling or by reusing materials.

Dealing with energy consumption/efficiency:

Energy consumption must be monitored and documented. Economic solutions must be found to improve energy efficiency and minimize energy consumption.

Animal welfare:

When using animals, attention must be paid to species-appropriate husbandry and compliance with the applicable animal welfare regulations. Measures that cause unnecessary suffering and pain to animals must be avoided as far as possible.

Conflict minerals

Dealing with conflict minerals

For the conflict minerals tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt, AIXTRON establishes processes in accordance with the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and expects the same from its business partners. Smelters and refineries without appropriate, audited due diligence processes should be avoided.

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Data protection

Compliance with data protection and confidentiality

The Business Partners undertake to meet the reasonable expectations of AIXTRON and its employees with regard to the protection of confidential information. Business Partners shall work with AIXTRON to enter into appropriate confidentiality agreements and to ensure appropriate protection of confidential information received. Business Partners shall comply with data protection and information security laws and governmental regulations when collecting, storing, processing, transmitting and disclosing confidential information.

3 Complaints procedure

AIXTRON encourages its business partners to report any violations of the law within AIXTRON's area of responsibility as soon as they are observed or are highly likely to occur. Business partners need not fear any disadvantages as long as the respective report is made to the best of their knowledge and with honest intent.

A suspected case or violation can be reported anonymously to compl-office@aixtron.com.