

California Supply Chain Disclosure

Statement for CA Civil Code Section 1714.43, or the California Transparency in Supply Chains Act of 2010

Axcelis Technologies, Inc. has adopted a Corporate Social Responsibility Policy which can be found on <u>Axcelis | Investor Relations - Governance Documents</u>. The Axcelis Corporate Social Responsibility Policy includes policies on compensation, hours of employment, and forced or child labor, that are inconsistent with human trafficking and slavery.

Our Corporate Social Responsibility Policy also states that Axcelis seeks to do business with partners who share the same commitment to human rights that we have. The policy requires Axcelis' suppliers and vendors to "confirm their compliance with these human rights commitments as a condition of doing business with Axcelis."

Although Axcelis employees routinely conduct audits of suppliers, Axcelis has not used a third party to verify compliance or address the risk of human trafficking and slavery. Axcelis has not requested that its suppliers and vendors certify that materials incorporated into our products comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business. Axcelis has not adopted formal internal accountability standards and procedures for non-compliance and has not trained supply chain employees on human trafficking and slavery and risk mitigation.

This statement is provided in accordance with the requirements of the California Civil Code Section 1714.43, or the California Transparency in Supply Chains Act of 2010.