



Axcelis Technologies, Inc. Supplier Code of Conduct

PHILOSOPHY AND SCOPE

In order to promote a safe, environmentally and socially responsible and humane workplace, Axcelis Technologies, Inc. ("Axcelis") has adopted:

- the [Code of Conduct of the Responsible Business Alliance](#) (formerly the Electronic Industry Citizenship Coalition),
- the [Axcelis Environmental Policy](#),
- the [Axcelis Ethical Business Conduct Policy](#),
- the [Axcelis Corporate Social Responsibility Policy](#) & the [Axcelis Corporate Social Responsibility web page](#) and
- The [Axcelis Occupational Health and Safety Policy](#).

Axcelis seeks to do business with partners - customers, suppliers and contractors - who share the same commitments that Axcelis has.

This Supplier Code of Conduct applies to all companies and individuals who directly provide material or services to Axcelis (a "Direct Supplier"). Direct Suppliers are responsible for communicating this Supplier Code of Conduct to the suppliers, vendors, and others, with whom Direct Supplier directly or indirectly interacts with, in order to provide Axcelis with materials or services (such indirect suppliers, together with the Direct Suppliers are the "Supply Chain"). Direct Suppliers are responsible for auditing, and enforcing the adoption and compliance of this Axcelis Supplier Code of Conduct by the Supply Chain.

This Supplier Code of Conduct is designed to ensure that all Direct Suppliers and the Supply Chain acknowledge the contents of the codes and policies listed above and commit to abide by their terms.

SCREENING, SUPPLIER AUDITS AND CONSEQUENCES OF NON-COMPLIANCE

Prior to entering into a new supplier relationship, Axcelis will screen candidates for compliance with this Supplier Code of Conduct and request supporting documentation and performance metrics. Once a company becomes a Direct Supplier to Axcelis, Axcelis will request it to periodically confirm its compliance with this Supplier Code of Conduct, as a condition of doing business with Axcelis. In turn, Direct Suppliers shall expect the entities in the Supply Chain to confirm their compliance with these commitments, as a condition of doing business with them. From time to time, Axcelis may ask Direct Suppliers to provide evidence of their own and their Supply Chain commitments and performance.

Compliance to this Supplier Code of Conduct will be part of Axcelis' ongoing Supply Chain audits and evaluation programs. Axcelis expects its Direct Suppliers to do similar monitoring of their suppliers through the Supply Chain.

Axcelis' business relationship with any Direct Supplier or other entity in Axcelis' Supply Chain will be permanently ended in the event of a failure to comply with those policies noted this Supplier Code of Conduct for which we have zero tolerance. If a Supplier is not in compliance with our zero tolerance policies, but has a plan and date to become compliant, Axcelis will provide a 90-day grace period to achieve compliance. Failure to achieve compliance within that period will cause permanent cessation of business with Axcelis.

CRITICAL POLICIES

The following policies covered by this Supplier Code of Conduct are critical to maintaining a business relationship with Axcelis:

Axcelis Corporate Social Responsibility Policy

Axcelis' Corporate Social Responsibility Policy addresses human rights and labor practices. Direct Suppliers and the Supply Chain are expected to comply with this policy as if they had adopted the policy directly. Among other things, Direct Suppliers and the Supply Chain must:

- prohibit child labor,
- prohibit forced labor,
- acknowledge labor's right to freedom of association,
- maintain legal and humane hours of work for employees, allowing for sufficient rest and maintenance of safety standards, and
- provide compensation that complies with law, is equal pay for equal work, and is sufficient to support an existence worthy of human dignity.

Axcelis' Supply Chain audits will include compliance with the Axcelis Corporate Social Responsibility. Axcelis will have zero tolerance for non-compliance with the policies set forth in the Axcelis Corporate Social Responsibility Policy.

Axcelis Environmental Policy

Axcelis actively promotes protection of the environment and sustainability. Axcelis maintains a comprehensive management system that defines and tracks our performance to environmental goals, as expressed in the Axcelis Environmental Policy. Direct Suppliers and the Supply Chain are expected to comply with this policy as if they had adopted the policy directly.

Axcelis has been certified to the ISO 14001 Environmental Management System standard since 2000. Axcelis encourages all Direct Suppliers and the Supply Chain to achieve

ISO 14001 certification. Direct Suppliers will be asked to disclose whether they are ISO 14001 certified.

Axcelis' Supply Chain audits will include compliance with the Axcelis Environmental Policy and other specific environmental criteria.

Axcelis Occupational Health and Safety Policy

Axcelis' Occupational Health and Safety Policy addresses its commitment to maintain a high level of employee health and safety. Axcelis maintains a comprehensive management system that defines and tracks performance to specific health and safety goals.

Axcelis believes that all injuries are preventable, and that every individual at our Direct Suppliers and at other companies in the Supply Chain are responsible for injury prevention. Axcelis' Supply Chain safety goal should be zero incidents and zero injuries. Direct Suppliers and the Supply Chain are expected to comply with this policy as if they had adopted the policy directly.

Axcelis' Supply Chain audits will include compliance with the Axcelis Occupational Health and Safety Policy and other health and safety criteria. Axcelis will have zero tolerance for non-compliance with the Axcelis Occupational Health and Safety Policy or violations of other health and safety criteria in our Supply Chain audits.

Ethical Business Conduct

Axcelis' Ethical Business Conduct Policy addresses a commitment that all Axcelis employees, officers and members of our Board of Directors must at all times act in an ethical manner and in full compliance with applicable law. Direct Suppliers and the Supply Chain are expected to comply with this policy as if they had adopted the Ethical Business Conduct Policy directly.

Axcelis' Supply Chain audits will include compliance with the Axcelis Ethical Business Conduct Policy. Axcelis will have zero tolerance for non-compliance with the Axcelis Ethical Business Conduct Policy.

OWNERSHIP

Axcelis Supply Chain and Quality Departments

Example of Supply Chain Audit/Commercial Assessment questions, relating to Supplier Code of Conduct policy:

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| Are you familiar with the Axcelis Supplier Code of Conduct, and if so, are you compliant with these requirements? Link: https://www.axcelis.com/wp-content/uploads/2019/09/Supplier-Code-Of-Conduct.pdf | 1 = Not familiar with ASCOC (Axcelis Supplier Code of Conduct). 3 = Yes - familiar with ASCOC only, but NOT compliant with the ASCOC. 5 = Yes - familiar with ASCOC, and YES compliant with the ASCOC. |
| Are you in compliance with the labor law standard (no forced labor, no human trafficking, child labor avoidance, competitive wages, limited workweek hours, nondiscrimination, respect of employees, and freedom of association)? | 1 = Not in Compliance. (NOTE: If we find you are in Non-Compliance with ANY of these items, we will cease to do business with you). 3 = N/A 5 = Yes - fully in Compliance. |
| Do you practice health and safety guidelines (occupational safety, emergency preparedness, prevention of occupational injury & illness, industrial hygiene, hazardous machine safeguarding, clean water and facilities) | 1 = Not in Compliance. (NOTE: If we find you are in Non-Compliance with ANY of these items, you will be subject to a negotiated improvement plan, or we will cease to do business with you). 3 = Not in Compliance, but have a firm plan and date to implement this (indicate date in the "Remarks" section). 5 = Yes - fully in Compliance. |
| Are you in compliance with environmental regulations or certified to ISO 14001 (have required permits & reporting, pollution prevention, wastewater and solid waste controls, monitored and controlled air emissions, adherence to applicable product markings) | 1 = Not in Compliance. (NOTE: If we find you are in Non-Compliance with ANY of these items, you will be subject to a negotiated improvement plan, or we will cease to do business with you). 3 = Not in Compliance, but have a firm plan and date to implement this (indicate date in the "Remarks" section). 5 = Yes - fully in Compliance. |

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| Do you have a Management System in place to support these standards (risk assessment, adherence to legal and customer requirements, communication, record keeping, training, improvement objectives, corrective actions, accountability & responsibility, internal audits, employee feedback) | <p>1 = Not in place.</p> <p>3 = Not in place, but have a firm plan and date to implement this (indicate date in the "Remarks" section).</p> <p>5 = Yes - fully in place.</p> |
| Are you in compliance with the Business Ethics guidelines (business integrity, disclosure of information, protection of intellectual property, protection of employee and supplier identity, fair business and competition) | <p>1 = Not in Compliance (NOTE: If we find you are in Non-Compliance with ANY of these items, we will cease to do business with you).</p> <p>3 = Not in Compliance, but have a firm plan and date to implement this (indicate date in the "Remarks" section). (NOTE: If we find you are in Non-Compliance with ANY of these items, but have a plan to do so, you will have 90 days to get into compliance, or we will cease to do business with you at that point).</p> <p>5 = Yes - fully in Compliance.</p> |