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**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549  
FORM SD  
Specialized Disclosure Report**

**AXCELIS TECHNOLOGIES, INC.**  
(Exact name of registrant as specified in its charter)

**Delaware, USA**  
(State or other jurisdiction  
of incorporation or organization)

**000-30941**  
(Commission  
File Number)

**34-1818596**  
(IRS Employer  
Identification No.)

**108 Cherry Hill Drive, Beverly, Massachusetts**  
(Address of principal executive offices)

**01915**  
(Zip Code)

**Eileen J. Evans, Executive Vice President, HR/Legal, and General Counsel, 978-787-4000**  
(Name and telephone number, including area code, of the person to contact in connection with  
this report.)

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2025.

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## Section 1 - Conflict Minerals Disclosure

### Item 1.01 Conflict Minerals Disclosure and Report

#### a) Conflict Minerals in Products.

Conflict minerals, as defined in Item 1.01 of Form SD, are necessary to the functionality or production of products manufactured by Axcelis Technologies, Inc. (the "Company") or contracted by the Company to be manufactured (the "Company's Products") as defined in Rule 13p-1 under the Securities Exchange Act of 1934, as amended (the "Rule") and for which manufacturing was completed in the period from January 1, 2025 to December 31, 2025. Accordingly, the Company is filing this Form SD for the calendar year covered by this report, as required by the Rule.

#### b) Implementation and Results of Reasonable Country of Origin Inquiry.

The Company has conducted in good faith a reasonable country of origin inquiry ("RCOI") that was reasonably designed to determine whether any of the conflict minerals in the Company's Products originated in the Democratic Republic of the Congo or an adjoining country or are from recycled or scrap sources. Since 2014, the Company has conducted an annual RCOI and related due diligence pertaining to the prior calendar year.

For calendar year 2025, the Company requested information from its 2025 material suppliers on March 17, 2026, using an online survey regarding the mineral content of the parts that such suppliers sell to the Company and their knowledge as to the source of any conflict minerals, including whether the conflict minerals come from recycled or scrap sources (the "Survey"). This information collection continued until April 20, 2026.

The Survey was sent to 1,370 suppliers of material included in the Company's Products. The Company received responses to the Survey and other responses from 268 different supplier divisions/locations, of which 13 indicated that they had no 2025 sales to the Company, for a net of 255 supplier divisions/locations with 2025 sales. At the conclusion of this process, the Company had responses from suppliers of parts or components included in the Company's Products representing 87.16% of the total amount spent on materials for the Company's Products in 2025.

As of April 20, 2026, 195 of the supplier responses with 2025 sales (76% of all such supplier responses) asserted that either:

- (A) no conflict minerals were present in the materials sold to the Company by the supplier; or
- (B) the conflict minerals in the materials sold to the Company by the supplier did not originate in the Democratic Republic of the Congo or an adjoining country or the supplier had no reason to believe that the conflict minerals in the materials sold to the Company may have originated in the Democratic Republic of the Congo or an adjoining country.

None of the responding suppliers asserted that products sold to the Company in 2025 included recycled or scrap conflict minerals.

Also as of April 20, 2026, 27 of the responding suppliers had not provided sufficient clarity to determine whether they could be placed in the above categories or not.

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**(c) Due Diligence on Specific Conflict Mineral Sources.**

There were 33 responding suppliers (13% of all responding suppliers with 2025 sales) which indicated that (1) one or more conflict mineral was incorporated in the materials sold to the Company and (2) they knew or had reason to believe such conflict minerals originated in the Democratic Republic of the Congo or an adjoining country and did not come from recycled or scrap sources. Accordingly, the Company has exercised due diligence on the source and chain of custody of these conflict minerals that conform to the Supplement on Tin, Tantalum and Tungsten and the Supplement on Gold included in the Organisation for Economic Co-operation and Development (“OECD”) framework: OECD (2013), OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Second Edition. The Company has filed a Conflict Minerals Report with respect to these conflict minerals.

This Form SD and the Conflict Minerals Report have been disclosed on the Company’s publicly available Internet website.

**Item 1.02. Exhibit**

In accordance with Rule 13p-1 under the Securities Exchange Act of 1934, the Company is filing as an exhibit to this Form SD the Conflict Minerals Report required by Item 1.01.

**Section 2 — Exhibits**

**Item 2.01 Exhibits**

The following exhibit is filed as part of this Report.

[Exhibit 1.01 — Conflict Minerals Report as required by Items 1.01 and 1.02 of this Form SD.](#)

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**SIGNATURES**

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

AXCELIS TECHNOLOGIES, INC.  
*(Registrant)*

/s/ Eileen J. Evans

By Eileen J. Evans, Executive Vice President, HR/Legal, and General Counsel

May 27, 2026

(Date)

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**Axcelis Technologies, Inc. Conflict Minerals Report**  
**Products for which manufacturing was completed during**  
**the year ended December 31, 2025**

This conflict minerals report is an exhibit to the Form SD filed by Axcelis Technologies, Inc. (the “Company”). As noted in the Form SD, 33 suppliers that responded to the Company’s reasonable country of origin inquiry survey (representing 13% of all supplier responses with 2025 sales) indicated that they knew or had reason to believe that a conflict mineral incorporated in one or more of the Company’s Products (as defined below) originated in the Democratic Republic of the Congo or an adjoining country, and did not come from recycled or scrap sources.

**Due Diligence**

The Company has exercised due diligence on the source and chain of custody of certain gold, tin, tantalum, and tungsten necessary to the functionality or production of the products described below that were manufactured either by the Company or under contract to the Company (the “Company’s Products”), as defined in Rule 13p-1 under the Securities Exchange Act of 1934, as amended (the “Rule”) during the period from January 1, 2025 to December 31, 2025. The Company’s due diligence conformed to the Supplement on Tin, Tantalum and Tungsten and the Supplement on Gold to the Five-Step Framework for Risk-Based Due Diligence in the Mineral Supply Chain included in the Organisation for Economic Co-operation and Development (“OECD”) *Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*, Second Edition.

The Company has taken the following actions as part of its due diligence:

**Sourcing Policy.** The Company adopted a conflict-free sourcing policy in 2012 as part of its Corporate Social Responsibility Policy, which is posted on the Company’s website. The Company has also communicated directly with suppliers regarding the content of the policy, which provides:

“Axcelis expects suppliers to only source materials from environmentally and socially responsible sources. Specifically, Axcelis will not support any vendor or other entity in its supply chain that extracts or transports minerals (including Tin, Tantalum, Tungsten or Gold) and uses the resulting financial or other resources to fund or otherwise fuel conflict in the Democratic Republic of the Congo, or any other country. Axcelis takes seriously the allegations that some metals mined or transported by such companies may be making their way into the general industry supply chain and that profits from these businesses could potentially contribute to human rights violations.

“Axcelis supports the development of independently verifiable supply chain transactions, when available and credible, to ensure materials are supplied from environmentally and socially responsible sources. Axcelis is committed to building on existing systems and practices to ensure that our suppliers comply with these expectations.”

**Conflict Mineral Team.** Beginning in 2013, the Company formed a team consisting of representatives from its Supply Chain management and Environmental, Health, and Safety management to focus on identifying the source of conflict minerals for reporting requirements.

**Risk Identification and Assessment.** The conflict mineral team has reviewed the Rule and educated itself regarding industry groups' efforts to address due diligence, including the Responsible Minerals Initiative ("RMI"), which was founded in 2008 by the Responsible Business Alliance (formerly known as the Electronics Industry Citizenship Coalition) and the Global e-Sustainability Initiative. The RMI (formerly known as the Conflict-Free Sourcing Initiative) publishes a Conflict Minerals Reporting Template and manages a Responsible Minerals Assurance Process, which is an independent, third-party audit that determines which smelters and refiners can be verified as having systems in place to responsibly source minerals in line with current global standards.<sup>1</sup> The conflict mineral team then developed a reasonable country of origin inquiry survey, as described in the Company's Form SD, which allowed the Company to identify vendors for whom there was a risk of sourcing from the Democratic Republic of Congo or an adjoining country. The Company engaged in further communication with, and evaluation of, suppliers who were identified as risks through the survey, including review of documents submitted to the Company, such as vendor sourcing policies, RMI Conflict Mineral Reporting Templates, and other material.

### **Risk Mitigation Steps**

During the reporting period for the calendar year ending December 31, 2026, the Company is continuing to engage in the activities described above in "Due Diligence." In addition, in its efforts to attain a conflict-free supply chain for its products, the Company intends to continue to contact its suppliers to encourage them and the smelters/refiners in the Company's supply chain to participate in the conflict free certification program developed under the Responsible Minerals Assurance Process of the RMI and the Global e-Sustainability Initiative.

### **Description of Products**

With respect to those of the Company's Products on which the Company exercised due diligence, the following table provides a description of the Company's Products, the facilities used to process the necessary conflict minerals in those products, if known, the country of origin of the necessary conflict minerals, if known, and the efforts to determine the mine or location of origin of those products.

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<sup>1</sup> The Company, as a smaller semiconductor equipment manufacturing company, is relying on the RMI and other electronics industry groups, as contemplated by the OECD *Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*, Second Edition. Specifically, the Company notes the following observation in Section C5 of the Supplement on Tin, Tantalum and Tungsten to the OECD's Five-Step Framework for Risk-Based Due Diligence in the Mineral Supply Chain: "Companies which, due to their size or other factors, may find it difficult to identify actors upstream from their direct suppliers may engage and actively cooperate with industry members with whom they share suppliers or downstream companies with whom they have a business relationship to identify which smelters are in the supply chain."

Description of Product Subject to Due Diligence	Facilities Used to Process the Conflict Minerals in the Product	Country of Origin of the Conflict Minerals	Efforts to Determine the Mine or Location of Origin
Components or parts for semiconductor processing ion implantation equipment sold by the Company covered by 22 supplier responses.	These vendors represented that all of the conflict minerals sourced from the Democratic Republic of the Congo and adjoining countries were from RMAP Conformant Smelters and Refiners <sup>2</sup> or ITSCI sources. <sup>3</sup>	Unknown	Receipt of completed RMI Conflict Mineral Reporting Template.
Components or parts for semiconductor processing ion implantation equipment sold by the Company purchased from 11 vendors.	These vendors represented that some or all of the conflict minerals sourced from the Democratic Republic of the Congo and adjoining countries were not from RMAP Conformant Smelters and Refiners or ITSCI sources.	Unknown	Ongoing communication with the vendors, including a reminder of the Company's sourcing policy and a request that the vendor work to ensure that all smelters/refiners used are RMAP Conformant or ITSCI sources. The Company will ask the vendor to confirm when they are using RMAP Conformant smelters or ITSCI sources and will from time to time consider a different source of the components or parts if the vendor has not provided such confirmation.

<sup>2</sup> RMAP Conformant Smelters and Refiners are smelters and refiners which are conformant with the Responsible Minerals Assurance Process assessment protocols published by the RMI. These protocols are used to determine which smelters and refiners can be verified as having systems in place to responsibly source minerals in line with current global standards.

<sup>3</sup> ITSCI sources are sources for tin which are certified as conflict free by ITRI, the global tin industry association.