



Corporate Social Responsibility Policy

PHILOSOPHY

Axcelis is committed to the recognition and safeguarding of human rights in all the countries in which we operate. Axcelis' Corporate Social Responsibility Policy is guided by the United Nation's Universal Declaration of Human Rights and is reflective of our Ethical Business Conduct at Axcelis Policy, our Environmental Policy and our commitment to a safe and humane workplace as evidenced in many of our Human Resources policies. At the same time, we respect the sovereignty of nations throughout the world and affirm their primary responsibility to protect their citizens' human rights. We seek to do business with partners - customers, suppliers and contractors - who share the same commitment to human rights that we have.

SCOPE

This policy applies to all Axcelis employees, as well as customers, suppliers, vendors and others with whom Axcelis employees interact in the context of their work. All employees are responsible for complying with this policy, and management will encourage employees to understand the policy and comply with applicable laws related to it. Axcelis expects its suppliers and vendors to confirm their compliance with these human rights commitments as a condition of doing business with Axcelis.

POLICY

Board of Directors

This Corporate Social Responsibility policy has been approved by the Axcelis Board of Directors, who monitor management's compliance with this policy through the management systems discussed below.

United Nations Standards

This Corporate Social Responsibility Policy is intended to conform to the UN Universal Declaration of Human Rights, linked here: [UN Universal Human Rights Declaration](#)

In addition, Axcelis acknowledges and supports the Corporate Responsibility to Respect Human Rights, as set forth in Part II of the UN Guiding Principles on Business and Human Rights (linked here: [UN Business and Human Rights](#)), and specifically acknowledges that the

responsibility to respect human rights requires that Axcelis:

- (a) Avoid causing or contributing to adverse human rights impacts through its own activities, and address such impacts when they occur; and
- (b) Seek to prevent or mitigate adverse human rights impacts that are directly linked to Axcelis' operations, products or services by Axcelis' business relationships, even if Axcelis has not contributed to those impacts.

Through our management systems discussed below, Axcelis conducts on-going due diligence to identify, prevent, mitigate and account for how the Company addresses its impact on human rights, as well as processes to enable the remediation of any adverse human rights impacts we cause or to which we contribute.

Responsible Business Alliance Standards

As required by many of our customers, Axcelis adheres to the Responsible Business Alliance (formerly the Electronic Industry Citizenship Coalition) Code of Conduct, which is linked here: [RBA Code of Conduct](#). The RBA Code of Conduct has detailed provisions on issues relating to (i) Labor, (ii) Health and Safety, (iii) Environmental, (iv) Ethics, and (v) Management Systems.

Legal Compliance and Ethics

This policy should be read in conjunction with Axcelis' ethics policy, entitled "Ethical Business Conduct at Axcelis," which is posted along with other important governance documents and policies on our Axcelis.com website: <https://investor.axcelis.com/corporate-governance/governance-overview>

Anti-Corruption

Our Ethical Business Conduct at Axcelis Policy prohibits corruption and the payment or acceptance of bribes or kickbacks, whether or not in a jurisdiction where such actions are prohibited by law. Axcelis expects all employees, regardless of the location of their employment to comply with the US Foreign Corrupt Practices Act (the "FCPA") and any other rules and regulations forbidding corruption. Axcelis assigns annual mandatory training on the US FCPA.

Monitoring Legal and Ethical Compliance

The General Counsel routinely and periodically monitors certain business activity for legal compliance. As a US public company, Axcelis must comply with the Sarbanes Oxley Act Section 404 requirements relating to internal controls over financial reporting. This requirement include the implementation of internal control systems that are designed to eliminate opportunities for fraud or corruption.

Reporting of Legal or Ethics Concerns

Reporting of ethics or legal compliance concerns can be made by employees through a variety of methods specified on the Axcelis intranet. Customers and suppliers are encouraged to report any concerns regarding ethics or legal compliance at Axcelis using any of a variety of contacts listed in the customer portal and supplier portal available on the Axcelis.com website.

Any reporting may be done anonymously, although reporters should consider that providing sufficient information (including contact information) may be necessary for us to undertake a productive investigation of the matter. All investigations will be handled promptly and in as confidential a manner as possible without compromising the effectiveness of the investigation.

Labor and Human Rights

In addition to the items specified in this policy, Axcelis adheres to the Labor standards covered by the Responsible Business Alliance Code of Conduct, which is linked above.

Diverse Workplace

Axcelis is committed to achieving diversity of gender and of other personal characteristics throughout its organization and to equal pay for equal work. Axcelis will seek to hire and retain employees that support a diverse workplace.

No Discrimination Based on Personal Characteristics, including race, color, and gender

As set forth in our Equal Employment Opportunity Policy, it is the policy of Axcelis to provide equal opportunity in all terms and conditions of employment free from discrimination based on personal characteristics. This policy applies to all employees globally. "Personal characteristics" include:

- race, color and ethnicity
- nationality, national origin or ancestry
- religion or creed
- physical or mental disability
- gender, gender identity or sexual orientation
- medical condition or physical appearance (including pregnancy)
- active military or veteran status
- age
- genetic information
- any other factor protected by federal, state, or local law

Compensation

Axcelis will pay employees at least the minimum wages and overtime rates required by law and collective labor agreements and, if no such laws or agreements apply, wages in line with

marketplace practices, providing such compensation provides equal pay for equal work and is sufficient to support an existence worthy of human dignity.

Hours of Employment

Axcelis will comply with applicable laws and rules, and relevant industry practice, governing the hours of work for our employees, providing such hours of work are humane and allow for sufficient rest and maintain safety standards.

Child or Forced Labor

Axcelis opposes the use of child labor at our operations and expects our customers and suppliers to demonstrate similar intolerance for such practices. The term "child" refers to any person under the age of 18. Axcelis opposes all human trafficking and slavery, and forced or compulsory labor. Axcelis will have zero tolerance for any child labor, human trafficking, slavery or other forced or compulsory labor. Any employee permitting such activities will be immediately terminated. Axcelis' business relationship with any vendor or entity in Axcelis' supply chain will be permanently ended in the event such activities are present.

Prevention of Harassment

Axcelis is committed to providing a work environment free of unlawful harassment. Our Discriminatory and Sexual Harassment Policy sets forth our comprehensive commitment to prevent the various types of harassment.

Health and Safety

This policy should be read in conjunction with Axcelis' Health and Safety Policy, which is posted on our Axcelis.com website: <https://www.axcelis.com/about/corporate-responsibility/> In addition to the items specified in our Health and Safety Policy, Axcelis adheres to the Health and Safety standards covered by the Responsible Business Alliance Code of Conduct, which is linked above.

Axcelis believes that all injuries are preventable and that every employee is responsible for injury prevention. Axcelis' safety goal is ZERO incidents and ZERO injuries. Safe behavior is a condition of employment.

Axcelis recognizes that the right to water is a fundamental human right.

In addition, Axcelis' commitment to violence prevention at work is set forth in our Workplace Violence Prevention Policy.

Environmental Policies and Goals

This policy should be read in conjunction with Axcelis' Environmental Policy, which is posted on our Axcelis.com website: <https://www.axcelis.com/about/corporate-responsibility/>. Axcelis maintains an ISO 14001 Certification. In addition to the items specified in our Environmental Policy, Axcelis adheres to the Environmental standards covered by the Responsible Business Alliance Code of Conduct, which is linked above.

Applicability to Supply Chain

Axcelis expects its vendors to comply with this policy and the Responsible Business Alliance Code of Conduct, including but not limited to standards relating to child and forced labor, and the compensation and hours of work policies.

Supply Chain Audits

Axcelis will audit its vendors and other entities in its supply chain to evaluate and ensure compliance to this policy and the RBA Code of Conduct. Axcelis will have zero tolerance for any violations of the human rights, including but not limited to child labor, human trafficking, slavery or other forced or compulsory labor.

Axcelis' business relationship with any vendor or entity in Axcelis' supply chain will be permanently ended in the event such activities are present.

Conflict Minerals

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.

Employee Training

Axcelis requires all employees to participate in training on the topics covered by this policy, including non-discrimination, anti-corruption under the FCPA and other laws, ethics, safety and other matters. The Axcelis Chief Executive Officer oversees the compliance with this required training, and adherence to assigned training is part of the annual employee evaluation process.

Corporate Social Responsibility Management Systems

Axcelis implements management systems as required by the Responsible Business Alliance Code of Conduct. In management's quarterly business review meetings, the General Counsel reports to senior leadership on all legal compliance and ethics issues currently pending, and Axcelis' Vice President of EHS and Facilities reports to senior leadership on health, safety and environmental compliance, goal setting and goal achievement.

As part of our Enterprise Risk Management ("ERM) system, the General Counsel also reports to the Audit Committee of the Board of Directors on any compliance and ethics issues currently pending. The Board also receives quarterly reports from management on other key risks. The ERM process allows for full Board oversight of the most significant risks facing the Company. The goal of the ERM process is to provide an ongoing effort, effected at all levels of the Company across all corporate functions, to identify, assess and monitor risk, and to agree on mitigating action.

OWNERSHIP

Board of Directors
Senior Leadership

RELEVANT RESOURCES

Ethical Business Conduct at Axcelis Policy
Discriminatory and Sexual Harassment Policy
Equal Employment Opportunity Policy
Foreign Corrupt Practices Act Presentation
Workplace Violence Prevention Policy
Axcelis ISO 14001 document #9900251 Environmental Policy
Health and Safety Policy