

audits and evaluation programs. Axcelis expects its Direct Suppliers to do similar monitoring of their suppliers through the 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

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 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.

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

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Example of Supply Chain

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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)

1 = Not in place.
3 = Not in place, but have a firm plan and date to implement this (indicate date in the "Remarks" section).
5 = Yes - fully in place.

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)

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 = 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