ASMPT Limited

Code of Business Conduct

Our Code applies to all employees of the ASMPT Group of companies, including all business segments and all its subsidiaries. This Code does not alter any of our terms and conditions of employment, nor does it create contractual rights for you or others.

ASMPT Code of Business Conduct *(Updated October 2026)*

Letter from Our Group Chief Executive Officer

Dear Colleagues,

I strongly believe that integrity starts with the choices each of us makes every day. It means doing what is right, even when a situation is difficult or the right answer is not immediately clear.

Our Code of Business Conduct sets out the key principles and standards that guide how we work and make decisions at ASMPT. Each of us is expected to exercise good judgment, take responsibility for our actions, and consider how our decisions affect our colleagues and the trust that our customers, suppliers, business partners and communities place in ASMPT.

Openness and accountability are essential to maintaining that trust. We should listen to different perspectives, ask questions and raise concerns early. If you are uncertain about the right course of action, seek guidance. If something does not seem right, speak up. Any suspected misconduct should be reported through the appropriate channels set out in the Code.

These expectations apply to all of us, regardless of our role or seniority. Leaders, in particular, have a responsibility to set the right example and foster an environment where people feel comfortable asking questions, raising concerns and speaking up.

We act with integrity because it is the right thing to do. In doing so, we strengthen the trust of our stakeholders and help support ASMPT's long-term growth and success.

I ask every colleague to read and understand the Code, apply its principles in your daily work and take personal responsibility for doing your part. Together, we can keep integrity at the heart of how we work, make decisions and treat one another.

Thank you for your commitment to upholding the values and standards that define ASMPT.

Bassel Haddad
Group Chief Executive Officer

Contents

I. Purpose of the Code of Business Conduct 4
a. Purpose of Our Code 4
b. Applicability of our Code 4
c. Expectations of Employees 4
d. Additional Expectations of Executives, Managers and Supervisors 4

II. Business Conduct 4
a. Ethics and Integrity 4

III. Respects and Values Our People 5
a. Respecting Our Employees 5
b. Non-Discrimination and Non-Harassment 5
c. Freely Chosen Employment 5
d. Prohibition of Child Labour 5
e. Wages and Benefits 6
f. Working Hours 6
g. Freedom of Association 6
h. Health and Safety 6
i. Human Rights of Use of Security Forces 6
j. Emergency Preparedness 6
k. Occupational Injury and Illness 6
l. Physically Demanding Work 7
m. Sanitation and Hygiene 7

IV. Conduct with Our Customers and Suppliers 7
a. Fair Competition and Anti-Trust Laws 7
b. Gathering Competitive Information 7
c. Anti-Corruption 7
d. Trade Compliance 8

V. Avoiding Conflict of Interest 8
a. Conflict of Interest 8
b. Outside Employment 9
c. Insider Trading 9

VI. Handling Company Properties 9
a. Handling of Company Property 9
b. Records and Financial Integrity 10
c. Protection of Intellectual Property 10
d. Data Protection, Data Privacy and Data Security 10

VII. Environment and the Global Communities 11
a. Environmental Sustainability 11
b. Land Rights 11
c. Responsible Sourcing of Minerals 11
d. Anti-Money Laundering 11

VIII. Raising Questions and Concerns 12
a. Reporting Misconduct and Violations 12
b. Whistleblowing Policy 12

IX. Consequences of Code Violations 12

I. Purpose of the Code of Business Conduct

a. Purpose of Our Code

ASMPT has a strong commitment to ethics and integrity, and we are expected to perform our job honestly, diligently and responsibly. Observing the laws and legal requirements in every country where we do business is a fundamental principle of ASMPT. This Code of Business Conduct has been prepared to guide us in making the right choices when we are called upon to do so. Understanding this Code is vital in maintaining the ASMPT culture and reputation.

b. Applicability of Our Code

This Code is applicable to all employees of ASMPT, including all business segments and units, operating companies and subsidiaries worldwide. We are all bound by the same Code.

In addition, ASMPT expects its business partners to act in a manner consistent with our Code. These include sales agents and distributors, suppliers, consultants, freight forwarders/agents and other third-party providers. They shall be referred to and comply with this Code and comply with all applicable laws. We only work with business partners who share our ASMPT values and ethics.

c. Expectations of Employees

All employees of ASMPT are expected to read, understand and follow our Code, and to act with honesty and integrity when acting on behalf of the Company. We have to follow the laws and regulations that apply. Always seek guidance when you have questions, and report any suspected violations as spelled out in the "Raising Questions and Concerns" section of our Code.

d. Additional Expectations of Executives, Managers and Supervisors

Those in supervisory roles must fulfil your duties of organization and supervision, and bear responsibility for all employees entrusted to you. You have the additional responsibility to emphasize the importance of ethical conduct and compliance and promote them through personal leadership and training. The best way to inspire ethical behaviour in others is to lead by example.

It is the responsibility of all executives, managers and supervisors to see that there are no violations of laws within your area of responsibility that proper supervision could have prevented. You are still responsible, even if you delegate particular tasks.

II. Business Conduct

a. Ethics and Integrity

In ASMPT, we believe that honesty, integrity and fair play are important company assets in business. You are expected to uphold the highest standards of integrity in all business transactions.

You shall comply with all laws and regulations on prohibited business practices and at the same time, uphold fair business standards in advertising, sales and competition.

III. Respects and Values Our People

a. Respecting Our Employees

ASMPT recognises that the well-being of our employees is a crucial factor in our daily business and is committed to ensure that our employees are treated with respect. ASMPT follows all applicable labour and legal laws and regulations wherever we conduct business. In addition, ASMPT aligns practices to industry standards, including the Responsible Business Alliance Code of Conduct, to uphold the human rights of our employees.

b. Non-Discrimination and Non-Harassment

ASMPT does not permit nor condone any discrimination against any one because of his or her gender, race, colour, age, religion, sexual orientation, nationality or ethnicity, political affiliation, pregnancy, marital status, disability, veteran status, and/or other characteristic protected under applicable law. No decisions of recruitment, salary adjustment, promotion prospects, staff benefits and access to training shall be based on the above criteria. We do not permit nor condone unacceptable treatment of employees in any form, such as harassment, violence, abuse or exploitation.

c. Freely Chosen Employment

There is no forced labour in any form, including but not limited to, bonded (including debt bondage) or indentured labour in ASMPT, and all employment is freely chosen and voluntary. In compliance with the Modern Slavery Act 2015 UK, no slavery or human trafficking is permitted.

All workers[1] are treated in a fair and humane manner in addition to freedom of movement in that there are no unreasonable restrictions on entering or exiting company-provided facilities. Workers are not required to surrender any government-issued identification, passports, or work permits as a condition of employment, unless such holdings are required by law. Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment beyond the regulatory or industry guidelines. As part of the hiring process, workers must be provided with a written employment agreement in their native language, or in a language the worker can understand, that contains a description of terms and conditions of employment prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms.

d. Prohibition of Child Labour

ASMPT does not employ anyone who is under the minimum age requirement stipulated in local labour laws and regulations or under the age for completing compulsory education. ASMPT support apprenticeship and internship programs that comply with local laws and regulations, including the health and safety of these participants.

[1] "Worker" refers to a foreign migrant worker who is recruited and moves legally from his or her home country to another country for the specific purpose of employment.

e. Wages and Benefits

Compensation including overtime pay and deductions from wages to employees and use of temporary, dispatch and outsourced labour shall comply with all applicable local labour and wage laws. Every employee's salary and benefit commensurate with individual qualification and working experience, with regular review of salary ranges to reflect competitiveness. Salary is highly confidential and personal, and thus, inappropriate to disclose such private information to others, including fellow colleagues.

f. Working Hours

Our working hours follow strictly the requirements stipulated in the local labour laws and, if needed, we will review our practices with references to such requirements.

g. Freedom of Association

ASMPT recognises the right of freedom of association of our employees in accordance with local laws.

h. Health and Safety

ASMPT strives to minimize any potential safety hazards and complies with all applicable local laws regarding safety requirements. Practices such as proper design, engineering controls and administrative controls are adopted. Appropriate measures shall be taken where possible to eliminate physical and chemical hazards. Where physical or chemical hazards cannot be eliminated, appropriate engineering controls such as physical guards, interlocks and barriers, or closed systems and ventilation are adopted. In addition, appropriate and qualified personal protective equipment and appropriate administrative controls such as safe work procedures are provided.

Reasonable steps shall be taken to remove pregnant women/nursing mothers from working conditions with high hazards, and to remove or reduce any workplace health and safety risks to pregnant women and nursing mothers. You shall adopt and at all times follow all safety measures put in place.

i. Human Rights of Use of Security Forces

In the event of use of private or public security forces, ASMPT shall ensure that the human rights of employees and other rights holders are respected, and there shall be no use of unlawful physical violence or psychological harm.

j. Emergency Preparedness

ASMPT identifies and assesses potential emergency situations and events, and their impact minimized by implementing emergency plans and response procedures. You shall follow these plans and procedures which include effective measures such as emergency reporting, employee notifications and evacuation procedures, emergency drills and recovery plans.

k. Occupational Injury and Illness

Procedures and systems are established to prevent, manage, track and report occupational injury and illness. You are encouraged to report, classify and record injury and illness cases. Managers and supervisors shall investigate all cases and implement corrective measures to eliminate the causes, provide necessary medical treatment and facilitate the return of your employees to work. You are to remove yourself from imminent harm, and not return until the situation is mitigated, without fear of retaliation.

l. Physically Demanding Work

ASMPT identifies, evaluates and controls our employees' exposure to hazards of physically demanding tasks, including manual handling, heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks.

m. Sanitation and Hygiene

ASMPT believes that a clean working environment is beneficial to the well-being of our employees. We strive to maintain a high level of hygiene in the workplace through practices like regular office cleaning, daily cleaning of public/common areas and provision of clean drinking water.

IV. Conduct with Our Customers and Suppliers

a. Fair Competition and Anti-Trust Laws

Competition laws, or anti-trust or anti-monopoly laws, permit markets to develop freely, where businesses compete to provide quality products or services at competitive prices and compete in research and development. ASMPT takes a serious view of anti-trust laws, abides by the rules of fair competition, and prohibits activities that negatively affect the market.

You shall not be involved in collusive bidding, price fixing, dividing territories, allocating customers, agreeing to contract terms with our competitors, or other similar activities. You shall not have any agreements or understandings with our customers, suppliers and other business partners that may unlawfully restrict competition. Anyone found in violation of anti-trust laws may be subjected to civil and/or criminal charges.

b. Gathering Competitive Information

ASMPT competes ethically and effectively in the marketplace. We gather certain forms of competitive information responsibly and ethically to avoid the risk of violating our Code and the law. As a general rule, you can collect and use information that is publicly available. You can use information from conversations with customers, as long as they are not confidential or related to anti-competition practices. You can use information from reputable advisers and consultants with appropriate assurances that it was properly obtained.

Any improper gathering of information or even an appearance can result in legal trouble for the Company and you. Therefore, you must never seek to obtain or use competitors' confidential or proprietary information either directly from competitors or through misrepresentation or any other improper means such as industrial espionage, bribery, theft or electronic eavesdropping, or communicate knowingly false information about a competitor or its product or services.

c. Anti-Corruption

ASMPT has a zero-tolerance policy towards any and all forms of bribery, corruption, extortion and embezzlement, in order to ensure ASMPT's reputation is not tarnished by dishonesty, disloyalty or corruption.

ASMPT follows local and other applicable international anti-corruption laws in all countries where we do business, including the Foreign Corrupt Practices Act USA, the Bribery Act UK, and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.

We compete fairly for orders with the quality and the price of our innovative products and services, not by offering improper benefits to others. You may not directly or indirectly, through a third party, offer, promise, grant or authorise the giving of money or anything of value to a government official or private commercial counterparty to influence action or obtain an improper advantage. You are not permitted to use your job to solicit, demand, accept, obtain or be promised advantages for yourselves or for your family members.

Anyone caught accepting or soliciting such improper benefits will face serious disciplinary action including dismissal, and civil and/or criminal liability and severe penalty.

d. Trade Compliance

ASMPT shall comply with all applicable import and export controls, and customs laws and regulations in the countries where it does business. ASMPT shall also abide by all applicable economic sanctions that its country adopts including embargoed or sanctioned countries, and controlled products. Export generally refers to the transfer of goods, services, hardware, software or technology to another country, including by electronic transmission or verbally. Some product, service or technology, and some countries especially embargoed/sanctioned countries, require applicable export licenses and permits, and proper duties paid, before any export can occur. Some countries have trade restrictions imposed due to financing terrorism, involved in narcotics trafficking or proliferation of weapons of mass destruction benefiting armed groups, or perpetrators of serious human rights abuses.

Violations of import export and customs laws and regulations may lead to serious penalties, including fines and governmental withdrawal of simplified import and export procedures hence impacting seamless supply chain.

V. Avoiding Conflict of Interest

a. Conflict of Interest

It is our duty to make business decisions in the best interest of ASMPT, not based on our own personal interests. A conflict of interest is when someone's personal or family interests or relationships might adversely influence their decisions and their ability to act in the company's best interests. It is important to identify and manage these conflicts to ensure fair and unbiased decision-making, and to uphold transparency, fairness, and ethical conduct in our workplace.

You shall notify the company if you or your family members have any personal interests or business relationships with competitors, customers, or suppliers of ASMPT, by informing your reporting manager, who may then ask for advice from the Compliance Office on whether and how to disclose the conflict of interest and any further actions to address the situation.

Failure to disclose a conflict of interest to ASMPT is a violation of our Code.

b. Outside Employment

If you wish to undertake any outside work whether for remuneration or otherwise, you are required to obtain prior written approval from your local Human Resources department. If approved, you have to ensure that your work commitments to ASMPT remain unaffected.

You may not seek outside employment that is detrimental to the interests or reputation of ASMPT, or is in competing activities with ASMPT, or perform work for a supplier of ASMPT. You may not accept outside work if it diminishes your ability to devote the necessary time and attention to your duties in ASMPT.

c. Insider Trading

You may come across inside information with regard to ASMPT or that of our customers, suppliers or joint venture partners whose securities are trading on a stock exchange or an organised securities market. Trading in these companies' shares while aware of inside information about that company is considered "insider trading".

Inside information is any material information which is not public knowledge, which, if it became publicly known, would likely have a significant effect on the price of the insider security. Once material information has been disclosed publicly to the marketplace through established channels and the public has had enough time to absorb the information, it is no longer "inside information".

You must maintain the confidentiality of inside information and not divulge to colleagues who do not need it to perform their duties. You must be careful not to share inside information with those outside the Company and are not allowed to recommend that a third party acquire or dispose securities for which that information is relevant, or to otherwise induce a third party to do so. Insider trading is illegal.

Executives, managers and supervisors can be held personally liable for damages in some cases if your employee violates insider trading rules and proper supervision could have prevented the violation.

VI. Handling Company Properties

a. Handling of Company Property

Company property includes facilities, equipment, vehicles, software, design and product drawings, computers, tools and supplies. You are entrusted with the proper use of these Company assets, and to protect these assets from theft, damage, loss and misuse.

You are not permitted without the consent of your executive, manager or supervisor to make records, files, video or audio recordings, or reproductions using ASMPT's equipment or facilities if the activity is not directly related to Company business. Any violations of improper handling of company property are treated seriously and may be subject to disciplinary actions including civil or criminal prosecution.

b. Records and Financial Integrity

ASMPT has sound processes and controls in place so that transactions are executed according to approved authorisation. You are required to follow these processes and controls and must prevent and detect unauthorised use of ASMPT's assets. You are required to make sure that ASMPT's books and records you create or are otherwise responsible for are complete, accurate, honestly reflect each transaction or expenditure, are timely and in accordance with applicable accounting rules and standards.

ASMPT's books and records include but are not limited to all data, certifications and other written materials provided for financial reporting and disclosure purposes as well as materials collected for other purposes. These also include personnel, time, expenses and safety records.

c. Protection of Intellectual Property

One of ASMPT's most important assets is our proprietary and confidential information including our intellectual property rights. You must be vigilant in protecting ASMPT's confidential and proprietary information, and follow the safeguards put in place to protect these from unintended or deliberate misuse.

Patents, copyrights and trademarks belonging to others may not be used without express permission from the owner. Any transfer of discoveries, inventions, know-how, concepts, processes, products and methods related to the business, and products and services of ASMPT must be done in a manner that protects intellectual property rights. Any violations are viewed seriously and will be subject to disciplinary actions.

d. Data Protection, Data Privacy and Data Security

ASMPT owns or has license to the technology we use in our business, including hardware, software and computer systems. You must ensure these technologies are not used for unauthorised, abusive, unethical, inappropriate or illegal purposes.

Personal data of everyone ASMPT does business with, including suppliers, customers, consumers, and employees, must be maintained in a secure manner and appropriate precautions shall be taken when collecting, storing, processing, transmitting and sharing it. You must follow ASMPT's procedures to ensure personal privacy protection and safeguarding of data security, and complying with all local laws, including but not limited to the Personal Data Protection Act where applicable.

VII. Environment and the Global Communities

a. Environmental Sustainability

Part of being an ethical company means doing business responsibly and protecting our global community. ASMPT is committed to comply with all applicable environmental rules and regulations, and to minimise adverse effects on the community, environment and natural resources while safeguarding the health and safety of the public and employees. You must abide by these laws and environmental policies and procedures established by the business for the protection of the environment.

b. Land Rights

ASMPT respects prevailing land rights and prohibits any unlawful eviction or deprivation of land, forests and waters, the use of which secures the livelihood of one or more persons, in particular during acquisition or construction activities.

c. Responsible Sourcing of Minerals

ASMPT takes appropriate measures to assure that the tantalum, tin, tungsten, gold (3TG) and cobalt used in the products we manufacture are not directly or indirectly sourced from restricted or embargoed countries,

You must exercise due diligence as set out in the Company's policies and procedures with your supply chain to ensure international trade compliance, and alignment to the Responsible Business Alliance's Responsible Minerals Initiative. Such responsible sourcing of minerals has to be communicated to your suppliers and the suppliers' suppliers, to ensure the entire supply chain is compliant.

d. Anti-Money Laundering

Money laundering is the process of disguising the nature and source of money connected with criminal activity such as terrorism, drug trafficking or bribery, by integrating tainted monies into the stream of commerce so that it appears legitimate, or its true source or owner cannot be identified.

ASMPT conducts business with reputable customers, suppliers, consultants and business partners involved in lawful business activities and whose funds are derived from legitimate sources. We do not facilitate money laundering and abide by applicable anti-money laundering laws. Our processes and procedures are designed to detect and deter suspicious forms of payment or customers or other transactions that could involve money laundering. To avoid problems in this area, you must be attentive to and report suspicious behaviour by customers, consultants and business partners. You must also follow all accounting, record-keeping and financial reporting requirements applicable to cash and payments in connection with other transactions and contracts.

VIII. Raising Questions and Concerns

a. Reporting Misconduct and Violations

ASMPT is committed to promoting high probity standards and ethical business practices and encouraging the reporting of concerns and actual or suspected misconduct or malpractice by any employee and/or external parties in any matter related to ASMPT.

If you are unsure about the right thing to do in a business situation, or whether the Code is being violated, you must seek guidance. You have a responsibility to alert your executive, manager or supervisor, or follow the Whistleblowing Policy below if you have knowledge of or any reason to suspect misconduct or actual or potential violation of this Code.

b. Whistleblowing Policy

The ASMPT Whistleblowing Policy is established for employees and those who deal with ASMPT to voice and report their concerns, in confidence and anonymity, to ASMPT's Board and Audit Committee about any violations (whether actual or suspected) relating to ASMPT business conduct regarding fraud, bribery, corruption, financial irregularity, human rights, environmental protection or conduct otherwise in violation of this Code committed by employees or others.

To make a report, you can go to ASMPT Whistleblowing Policy website: https://www.asmpt.com/en/investor-relations/governance/ethics and use the available channel(s) for your region.

All reports received shall be handled in a reasonably timely fashion and with a high degree of confidentiality, and if there is reasonable suspicion of a criminal offence having been committed, a report shall be made to the appropriate law enforcement agency. ASMPT pledges to protect employees against retaliation and adverse employment actions for whistleblowing concerns expressed in good faith.

Please be aware that your information may have serious consequences for the persons involved in any allegations of impropriety. False reports made with malicious intent may lead to disciplinary action.

IX. Consequences of Code Violations

This Code is an integral part of our ethical culture and reputation. Code violations may result in serious disciplinary action – up to and including termination. In appropriate cases, ASMPT may also refer misconduct to appropriate authorities for prosecution. This may subject the individuals involved to civil and/or criminal penalty.

ASMPT does not tolerate any Code violations.