

Complaints procedure

human rights and environment

AIXTRON SE



AIXTRON

Rules of procedure for the complaints procedure for reporting human rights and environmental risks and violations

I. Introduction

AIXTRON SE and its Group companies (hereinafter referred to as "AIXTRON") are committed to respecting human rights and protecting the environment. It is the declared aim of the company's management to respect, protect and promote human rights and the environment along the entire value chain. Violations of internationally enshrined human rights and of national and international environmental protection regulations are not tolerated. AIXTRON takes appropriate and effective measures to identify and verify human rights and environmental risks in its own business area and throughout the supply chain and to prevent the realization of risks. For this purpose, Aixtron has established, among other things, a complaints procedure ("Complaints Procedure") through which persons ("Whistleblowers") can report human rights and environmental risks as well as violations of human rights or environmental obligations that have arisen as a result of AIXTRON's business activities in its own business area or a direct or indirect supplier ("Complaint").

These rules of procedure explain how Complaints can be reported to the Compliance Department as the responsible body at AIXTRON ("Complaints Office") and how they are processed by the Complaints Office.

II. Whistleblower

The Complaints Procedure is open to the public and is available to all persons, anywhere in the world.

III Procedure

1. Responsibility for the Complaints Procedure

The Compliance Department is the Complaints Office responsible for receiving and processing Complaints. The Complaints Office is impartial and independent when processing Complaints, is not bound by instructions and is obliged to maintain confidentiality.

2. Lodging a Complaint

Complaints can be reported to the Complaints Office via the following e-mail address:

compl-office@aixtron.com

Complaints can be submitted by name or anonymously.

3. Confidentiality of Complaints

The protection of whistleblowers and the confidentiality of Complaints is a top priority for AIXTRON. Complaints are therefore only visible to the Complaints Office and are of course treated confidentially in accordance with legal requirements.

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4. Confirmation of receipt and further procedure

The Complaints Office

- generally confirms receipt of the Complaint to Whistleblowers within 14 days;
- examines the Complaint for validity and, if necessary, discusses the facts of the case with the Whistleblower;
- if necessary, takes appropriate (remedial) measures such as conducting an investigation; and
- provides feedback on the status of the investigation to Whistleblowers, usually within three months of confirmation of receipt. Whistleblowers will be informed of the outcome of the investigation at the latest after its conclusion, to the extent permitted by law.

The Complaints Office may also use the support of other functions or companies within AIXTRONS or external service providers to process Complaints.

IV. Prohibition of retaliatory measures

AIXTRON will not tolerate any retaliation against Whistleblowers who have reported a Complaint in good faith. The same applies to persons who have provided truthful information in connection with such a Complaint or a subsequent investigation, who have assisted the Whistleblower with the Complaint or who are associated with the Whistleblower. Any actual or threatened retaliation will itself be considered a serious violation of our internal guidelines and will be punished accordingly.

V. Data protection

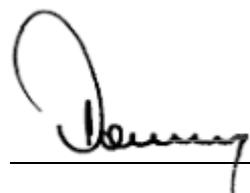
Compliance with the statutory retention obligations and data protection regulations is ensured by the Complaints Office.

VI Effectiveness of the Complaints Procedure

The effectiveness of the Complaints Procedure is reviewed once a year and on an ad hoc basis, for example if AIXTRON has to reckon with a significantly changed or significantly expanded risk situation in its own business area or at a direct supplier, for example due to the introduction of new products, projects or a new business segment.

Herzogenrath, December 2023

For the Executive Board of AIXTRON SE



Dr. Christian Danninger
CFO