

Policy statement on human rights and environmental strategy

AIXTRON SE

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I. Introduction

AIXTRON SE (hereinafter referred to as AIXTRON) does not currently fall within the scope of the German Supply Chain Compliance Act (LkSG). Nevertheless, AIXTRON strives to maintain a compliance program based on the LkSG to protect human rights and the environment in AIXTRON's business and supply chain in order to promote compliance with human rights and environmental standards as a basis for the sustainable development of our planet and to live up to AIXTRON's claim to be a reliable and responsible business partner.

AIXTRON is committed to upholding human rights, respecting the rights of employees and protecting the environment. It is the declared aim of the company management to respect, protect and promote human rights and the environment along the entire value chain. Violations of internationally enshrined human rights and national and international environmental protection regulations are not tolerated. In particular, consideration is given to the rights of potentially affected groups.

The following international regulations, to which AIXTRON is committed, form the basis of the human rights and environmental due diligence obligations:

- United Nations International Bill of Human Rights
- United Nations Guiding Principles on Business and Human Rights
- Declaration of the International Labor Organization (ILO) on Fundamental Principles and Rights at Work
- International Convention on Economic, Social and Cultural Rights
- UN Global Compact
- OECD-Guidelines for Multinational Enterprises
- Core labor standards of the International Labor Organization
- United Nations Convention on the Rights of the Child
- Act on Corporate Due Diligence to Prevent Human Rights Violations in Supply Chains (LkSG)

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The principles of human rights and environmental strategy set out in this declaration apply throughout AIXTRON, including its subsidiaries in Germany and abroad, and must be observed by management and employees in the performance of their duties. They supplement the AIXTRON Code of Conduct including all other corporate principles, guidelines and instructions. Local implementation is the responsibility of those in charge at the respective location.

AIXTRON also expects all business partners to comply with human rights and environmental obligations. Respect for and observance of human rights and environmental obligations is a basic prerequisite for cooperation with AIXTRON.

II. Respect for human rights and the environment throughout the supply chain

Respect for human rights and the environment throughout the supply chain covers the following topics:

1. Compliance with the prohibition of slavery, child and forced labor;
2. Compliance with regulations on occupational health and safety and working hours;
3. Recognition of the right of all employees to form or join employee representative bodies/trade unions, to strike and to engage in collective bargaining;
4. Equal treatment of all employees free from any discrimination based on, among other things, national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion or belief (unequal treatment also includes the payment of unequal remuneration for work of equal value);
5. Granting of an appropriate wage, at least in the amount of the minimum wage stipulated by the applicable law;
6. Compliance with the prohibition on causing harmful soil change, water pollution, air pollution, harmful noise emissions or excessive water consumption;
7. Compliance with the prohibition of unlawful eviction or deprivation of land, forests and waters;
8. Compliance with the ban on the use of private and public security forces if this threatens a violation of human rights;
9. Compliance with the prohibition to impair human rights through other conduct in a particularly serious manner;

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10. Compliance with the ban on the manufacture of mercury-added products and the use of mercury and mercury compounds in manufacturing processes as well as unauthorized treatment of mercury waste;
11. Compliance with the ban on the production and use of banned chemicals in accordance with the Stockholm Convention of May 23, 2001
12. Compliance with the ban on the non-environmentally sound handling, collection, storage and disposal of waste and the unauthorized export and import of hazardous waste.

AIXTRON takes appropriate and effective measures in accordance with to identify and verify these human rights and environmental risks in its own business and throughout the supply chain and to prevent risks from materializing. If it is determined that a violation of a human rights or environmental obligation has occurred or is imminent, a targeted remediation process takes effect, as part of which individual measures are taken to end a violation and minimize its consequences.

All measures taken as part of our human rights and environmental responsibility follow the principle of "empowerment before retreat": We are committed to supporting our business partners in avoiding and ending violations of human rights or environmental regulations before we abandon business relationships or switch to alternative sources of supply.

III. Analysis and management of human rights and environmental risks

1. Priority human rights and environmental risks identified

Overall, AIXTRON considers the human rights and environmental risks identified in the risk analysis to be low. AIXTRON has identified a double-digit number of potentially risky suppliers, but no human rights and environmental violations have been identified. Of these potentially risky suppliers, a single-digit number of suppliers were identified as having priority human rights and environmental risks in the AIXTRON supply chain. AIXTRON has taken the measures described below to mitigate or eliminate these risks in order to meet its self-imposed human rights and environmental obligations.

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2. Effective risk management

The due diligence obligations are implemented for the company's own business area and the entire supply chain as part of a risk management system. Through the horizontal and vertical integration of due diligence obligations into all relevant business processes, AIXTRON ensures that risks are identified and that preventive and remedial measures are implemented in a targeted manner in a timely manner if human rights and environmental risks or violations are identified. The aim is to appropriately weight and prioritize the identified human rights and environmental risks and violations in the context of preventive and remedial measures in order to be able to remedy them quickly. Risk management is implemented across the Group and is managed and monitored centrally by a specialist department at AIXTRON.

a) Measures for effective risk management

The risk management system establishes processes for implementing the due diligence obligations and defines areas of responsibility, competencies and reporting lines.

The due diligence obligations are anchored horizontally within AIXTRON. All relevant departments - Purchasing, Quality Management, Legal, Compliance - are involved in the implementation steps. Operationally, the implementation of the due diligence obligations is managed by the Compliance department. It is responsible for risk mitigation measures and reviews the effectiveness of the internal control and risk management systems as part of regular and ad hoc audits.

The vertical anchoring of due diligence obligations is achieved by defining supervisory and coordination responsibilities at Executive Board level. The Executive Board has overall responsibility for the implementation of human rights and environmental due diligence obligations.

AIXTRON has appointed a Human Rights Officer, who monitors risk management for the company's own business unit and the entire supply chain and carries out regular effectiveness reviews. Together with the departments Purchasing, Human Resources, Sustainability and Compliance, the Human Rights Officer works on the ongoing development of the catalog of measures for compliance with human rights and environmental due diligence obligations. The Human Rights Officer is independent and not bound by instructions and reports directly to the management. The Executive Board is informed about the work of the Human Rights Officer at least once a year.

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b) Identifying, weighting and prioritizing risks

AIXTRON leads conducts comprehensive risk analyses with regard to compliance with human rights and environmental obligations within its own business unit and at its direct and indirect suppliers. We draw on both internal and external expertise. The complexity and scope of our international supply chain require the use of technical solutions that support us in identifying, verifying, weighting and prioritizing risks.

Our risk analysis system enables us to determine the individual risks of each business partner. Based on general supplier information - in particular country of origin and industry - an abstract risk analysis is carried out based on a large number of recognized indices and studies by external experts. We then check business partners for specific human rights or environmental risks on the basis of self-declarations from business partners, verified certifications and our own findings from inspections or business processes. This not only takes into account the business partner's country of origin and sector. We also analyze product risks, trade level risks, the complexity of upstream supply chains and a wide range of other data in order to narrow down, localize and identify risks at an early stage.

We weight and prioritize risks by comparing the typically expected severity of a possible legal violation and its irreversibility with the probability of occurrence. We also take into account our own possible contributions to causation and the degree of our influence in order to prioritize risks and take targeted action where there is a threat of risks materializing. We use a risk matrix to identify our need for action and initiate preventive and remedial measures where they are necessary.

c) Take preventive action

The comprehensive risk analysis is supplemented by appropriate and effective preventive measures.

An internal Code of Conduct applies in our own business area, which clearly and comprehensibly summarizes the human rights and environmental expectations and rights of employees.

AIXTRON offers extensive training and education opportunities for employees. Employees entrusted with the implementation of human rights and environmental due diligence obligations regularly take part in further training measures in order to be able to implement

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the international requirements for human rights and environmental protection throughout the entire supply chain. We offer our business partners training and further education opportunities so that they too are empowered to promote human rights and environmental protection in their business activities.

We carry out regular and ad hoc checks in our own business area in order to identify and minimize risks at an early stage. We monitor business partners within the scope of legal possibilities and requirements. In particular, direct suppliers are subjected to careful scrutiny before entering into new business relationships.

AIXTRON continuously develops and implements appropriate sourcing strategies and purchasing practices to prevent or minimize identified human rights and environmental risks/violations, taking into account the identified risks. This also includes ensuring that human rights and environmental expectations are taken into account when selecting a supplier.

We require business partners to pass on our human rights and environmental expectations in the supply chain and to monitor compliance on an ongoing basis. To this end, our Code of Conduct for Suppliers forms the basis for entering into a new business relationship.

d) Remedy

Effective remedial action must be taken when a violation of a human rights or environmental obligation occurs or is imminent.

AIXTRON will initiate corrective action immediately upon identification of a violation. In AIXTRON's own business unit choose a remedy that leads to an end to the violation. In addition, we develop customized remedial measures for each situation and each direct or indirect supplier in order to end violations in a targeted manner. At the same time, we have developed a series of framework measures that can be activated and filled with specific content in response to breaches.

For each corrective action, we define a process, success targets and clear internal company responsibilities. Each corrective action contains a concrete timetable and can be provided with interim targets.

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e) Follow up on tips

An important role in identifying risks and violations in the supply chain is played by a functioning complaints procedure that is accessible to all those affected in the supply chain - from employees and suppliers to third parties who are affected by our activities or those of our suppliers.

Our mail-based whistleblowing system takes into account the complexity of our supply chain. Any access threshold is set low to make it as easy as possible to submit reports. The complaints procedure is open to the public and is available to all persons, whether in Germany or abroad. Complaints can be reported to the Complaints Office via the following email address:

compl-office@aixtron.com

The rules of procedure for the complaints procedure can be found in text form on the AIXTRON website. The protection of whistleblowers and the confidentiality of the complaint is of paramount importance to AIXTRON. Information submitted to is taken into account as part of the risk analysis.

f) Documentation and reporting

The implementation of all due diligence obligations is documented on an ongoing basis. We use a central risk management system to network all the information available to us on identified risks and the preventive and corrective measures taken.

We are also committed to transparent communication on the human rights and environmental challenges faced by AIXTRON. We communicate at least once a year on our website about identified human rights and environmental risks, the measures taken and the progress made, how we assess the impact and effectiveness of the measures and what conclusions we can draw from this assessment for future measures.

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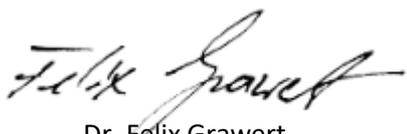
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IV. Outlook

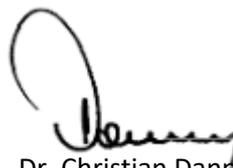
AIXTRON is committed to the ongoing review, development and improvement of its own measures to continuously minimize human rights and environmental risks. The effectiveness and efficiency of all human rights and environmental due diligence obligations must be ensured at all times. Effectiveness reviews are carried out on an ad hoc basis and at least once a year.

(Adopted on 22.12.2023)

AIXTRON SE
The Executive Board



Dr. Felix Grawert
Chief Executive Officer



Dr. Christian Danninger
Chief Financial Officer