

Rev:

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.

- 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

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. The company reports to senior leadership on all legal compliance and ethics issues currently pending, and environmental compliance, goal setting and goal achievement.

As part of our Enterprise Risk Management process, 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