



Respect	Sustainability	Integrity	Security	Speak up
				
We respect each other	We act responsibly	We operate with integrity	We safeguard our assets	We speak up

ASML

Code of conduct

2024

Our Code of Conduct

At ASML, we’re passionate about our products and services and bring together the brightest minds to achieve our goals. Our company’s values of challenge, collaborate and care are part of a shared belief system within ASML that defines who we are.

Our Code of Conduct (Code) sets out the baseline of ethical behavior that we expect from everyone. It enables us to make the right decisions by providing guidance on our interactions with colleagues, customers, suppliers, shareholders and society as a whole.

We are all responsible for living up to the principles of the Code. Let’s show the world that ASML operates in an ethical and caring way, guided by our common values.

We are ASML.

On behalf of the ASML Board of Management,
Christophe Fouquet



“Our Code defines the principles we all believe in”

It allows us to work well together and to speak up when something doesn’t feel right. The Code offers our employees two things: protection and guidance.

Christophe Fouquet
Chief Executive Officer

Why our Code matters

We rely heavily on the skills, commitment and behavior of our employees. That’s why we expect everyone who works for [ASML](#) to represent the company’s values and act with integrity and respect at all times.

Our Code helps us maintain these high standards by making clear what we stand for and how we operate. It sets out the responsibilities and behavior expected from everyone working for or with us, including our suppliers, customers, research partners and any other parties we work with and whom we expect to uphold comparable standards. It also supports us in making the right decisions by providing guidance on our interactions with colleagues, business partners and society as a whole.

Since 2011, ASML has been a member of the [Responsible Business Alliance](#), the world’s largest industry coalition dedicated to responsible business conduct in global supply chains. Our Code builds on the Responsible Business Alliance Code of Conduct, which is a set of social, environmental and ethical [industry standards](#).

The Code applies to all ASML employees, officers and directors. This includes our Board of Management, everyone on our payroll (including consultants) and those working under the supervision of ASML (including non-employee workers). The Supervisory Board of ASML also agrees to adhere to this Code.

What is expected of me?

All employees need to read and understand our Code. You sign it in your contract and commit to complying with it at all times. Familiarize yourself with the principles laid out in the Code and comply with the underlying corporate policies, guidelines, procedures and applicable laws and regulations. Our Code sets out the baseline of ethical behavior and principles, but it is not an exhaustive list. We ask all employees to also refer to the [Principles in practice](#) for further guidance, practical examples and details of relevant corporate policies and trainings.

We expect you to lead by example, participate in ethics and compliance trainings, annually re-certify your acknowledgement of the Code and report any potential violation of the Code. Our people leaders are expected to ensure a physically and psychologically safe and open environment that fosters a culture of compliance and supports employees to speak up and report any concerns without fear of retaliation.

What happens if the Code is violated?

We strongly encourage everyone to [speak up](#) so that we can maintain our company culture and help protect ASML’s reputation. You can do this in confidence, even anonymously if necessary. Any violation of the Code is taken seriously and could lead to disciplinary action such as training, a warning, demotion or termination of employment. Any measures taken should be in line with applicable laws and regulations, local policies and procedures.

Doing the right thing

One day you may find yourself in a situation where you are not sure what to do or you observe behavior that violates our Code. You are encouraged and expected to identify and act upon these situations. By doing so, you give yourself, colleagues, managers, counterparts and ASML as a company the opportunity to deal with the issue appropriately and proactively. This is essential if we are to maintain our integrity and sustain our reputation, success, and ability to operate – both now and in the future. We do the right thing by taking responsibility for our decisions and actions.

If you have any concerns that our Code is being violated – report it.



How to speak up


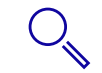








Ethical decision making

If you are not sure whether your own or someone else’s action is ethically appropriate, you should take a moment to pause and reflect on some of the following questions.

- Would I feel comfortable if someone did this to me?
- Does this action represent the kind of person I want to be?
- Do I understand the risks and potential negative consequences for me, someone else or ASML?
- Is this in line with my own values, as well as ASML’s values, and will I keep my self-respect if I go ahead?
- Is it fair and honest?
- If I were to ask family, friends, colleagues or other people I respect, would they approve or think that the situation is acceptable?
- Would I want this to be made public through social media or news outlets and be seen by ASML, my employer?

If the answer to any of these questions is ‘no’, the action is unlikely to be consistent with our Code. You can seek advice or report it through any of the [Speak Up channels](#).

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 <h3>We respect each other</h3> <p>Treat people fairly and equally</p> <p>Create a safe place to work</p>		 <h3>We act responsibly</h3> <p>Reduce our impact on the environment</p> <p>Respect human rights</p> <p>Ensure a responsible value chain</p>		 <h3>We operate with integrity</h3> <p>Uphold fair business conduct</p> <p>Comply with laws and regulations</p> <p>Report transparently</p>		 <h3>We safeguard our assets</h3> <p>Use ASML assets responsibly</p> <p>Secure our knowledge</p> <p>Treat information confidentially</p>		 <h3>We speak up</h3> <p>Address violations of the Code</p>	

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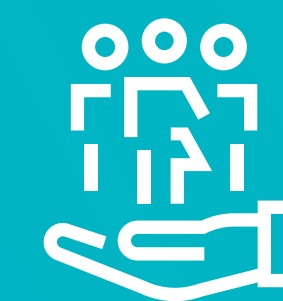
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We respect each other

ASML’s success is driven by our unique and diverse teams, reflecting the societies in which we operate and the markets we serve. We foster an environment based on mutual respect by working together and using our values to guide us. We create a safe and tolerant environment of inclusion and belonging that leads to better results than any of us can achieve alone. It is our belief that innovation thrives in an environment where diverse perspectives are valued and everyone is empowered to contribute. We uphold and respect the fundamental human rights underlying these principles and values.



Treat people fairly and equally

Create a safe place to work

Treat people fairly and equally

Diversity and inclusion is a cornerstone of our culture as it enables everyone to bring their capabilities and perspectives to our work.

We believe it is only in a truly inclusive culture that people can be at their best and feel safe to speak up. Diversity of cultures, perspectives, education and talents make us a stronger, more creative, successful and innovative company. We treat all employees, job applicants and others under the supervision of ASML fairly and equally. Everyone should feel valued, respected and be able to fully contribute as this leads to better results than any of us can achieve alone.



“We’re mutually responsible for creating a safe environment”

Creating an environment where respect, equality and treating people fairly is the foundation for working together.

Annelieze Potgieter
Supplier operations manager
Chair, Women employee network



“Take ownership by thinking – how would I like to be treated?”

Respecting each other is key to a thriving environment. It is crucial to create a safe place to work, both for physical health and psychological safety.

Femi Cole
Team lead, wafer and reticle qualification

Create a safe place to work

At ASML we create a physically and psychologically safe place to work.

We expect everyone to contribute to a work environment free of any kind of inhumane treatment, including all forms of discrimination, harassment, threats, bullying, humiliation, intimidation and retaliation.

Health and safety

Aiming for zero injuries and preventing work-related illnesses, it is our goal to make ASML a safe place to work. We have procedures and systems in place to prevent, manage, track and report physical injuries and work-related illnesses, including channels through which employees report cases. We investigate and implement corrective and mitigating measures to eliminate their cause, minimize the health and safety risks and facilitate employees’ safe return to work.

Well-being

ASML is committed to supporting employees’ rights to health and family life. We acknowledge and support employees in achieving a balance between work and private life at different stages of their lives. We take a holistic approach to well-being and support four elements that make up a person’s sense of well-being: mental, physical, social and financial well-being.

We act responsibly

Technology reaches all parts of society. ASML has an important role to play in helping to make chips more affordable, more powerful and more energy efficient. We have a great opportunity and a moral obligation to drive sustainable growth. We want to grow our company and increase our positive impact while minimizing our negative impacts on the environment and people. In line with our ESG sustainability strategy, we aim to achieve our business objectives in a caring, safe and responsible manner.



Reduce our impact on the environment

Respect human rights

Ensure a responsible value chain

Reduce our impact on the environment

In a world where our sustainability commitments have become more urgent, we have a responsibility to always consider the potential impact of our activities on our people and the environment.

At ASML we want to continue enabling the expansion of computing power and maximizing the value created, while minimizing waste, energy use and emissions. We are committed to reducing the carbon footprint of our supply chain, our own operations, and from the use of our products and services. We aim to maximize the value of our products by reusing resources as much as possible, while minimizing waste, decoupling our growth from resource consumption and recycling materials.



“It’s important to give a voice to an issue that has no voice of its own”

Including environmental sustainability as a topic in our Code helps to keep it top of mind.

Iris Claessen
Portfolio manager, procurement
ESG sustainability ambassador



“ASML is not only responsible for respecting human rights in its own workforce”

Human rights extends to topics such as family life, privacy, and working conditions and can impact people throughout our value chain.

Katja Fenton
Head of ethics & business integrity

Respect human rights

We respect internationally recognized human rights standards in our operations and contribute to upholding these across our value chain and in the communities in which we operate.

We uphold and respect human rights in line with international laws, regulations and standards, such as the [United Nations Guiding Principles on Business and Human Rights](#), and we expect the same from our suppliers, customers, research partners and any other business partners. To achieve this, we have processes and policies in place that help us to identify, prevent, mitigate and account for negative impacts on the human rights of our employees, workers in our value chain and affected communities.

This means we respect, among others, freely chosen employment, children’s rights, women’s rights, minority rights and migrant workers’ rights. We will take immediate action if we identify, either within our own organization or our value chain, any potential risk of [child](#) labor; forced, (debt) bonded or indentured labor; involuntary or exploitative prison labor; or slavery or human trafficking. All work should be voluntary and not subject to mental or physical oppression or duress.

We are committed to fair and balanced employment conditions, complying at a minimum with all applicable laws and standards, in accordance with our [Human Rights Policy](#).

Ensure a responsible value chain

We aim to have a positive social impact by providing an attractive workplace, ensuring a responsible value chain, supporting an innovation ecosystem and being a valued partner in our communities.

As a global technology company, we impact many people’s lives, both directly and indirectly. ASML strives for a positive impact on our employees, the communities around us and everyone involved in our innovation ecosystem and value chain. We believe in collaborative, consultative and partnership-based approaches to our business relationships and our community involvement.

Within our own operations and value chain we take appropriate measures to manage potential negative impacts on people and the environment. We expect our suppliers to meet sustainability requirements, including responsible sourcing of [conflict minerals](#), set out by

applicable laws and standards and to work together with us to prevent and mitigate negative impacts on human rights and the environment.

We seek collaboration with our customers to promote the concept of responsible product use and we work to prevent or mitigate negative impacts on human rights and the environment in our downstream value chain.

We aim to mitigate any negative impact and contribute to improvements and positive experiences in our communities. We support startups and scaleups with the ambition to contribute to a better, more sustainable world.

“Let the Code be a conversation starter; it can help you determine how to act”

The Code is also important when working with our suppliers as we have an obligation to ensure good working conditions in the supply chain.

Regina Voss
ESG sustainability project lead, procurement



We operate with integrity



It is essential to our culture of integrity and compliance that we demonstrate honesty and sincerity at all times. Our actions, both individually and collectively, shape how our company is perceived in conducting business.

Uphold fair business conduct

Comply with laws and regulations

Report transparently



“Would you like to read about what you did in the newspaper?”

In a globally operating company with international staff, creating a common set of guidelines is an important basis for successful collaboration and company progress.

Rainer Meburger
Head of non-product-related procurement

Uphold fair business conduct

We are committed to the principles of fair competition in dealing with our business partners and other stakeholders. We do not tolerate any form of fraud and are committed to preventing the improper influence of others in our day-to-day work or letting others improperly influence us.

Compliance is not just about complying with laws and regulations but also about adhering to our high ethical standards when conducting business. ASML does not allow any form of conduct that is considered illegal under applicable laws. We will not engage in business or cooperate with business partners who resort to anticompetitive behavior or imply entering into illegal conduct.

Fraud is not tolerated

Doing business with integrity and in a fair way means we do not tolerate fraud, bribery and corruption, including offering or receiving improper gifts and entertainment. To uphold our global standards, this applies to dealing with public officials, as well as in relation to commercial transactions, regardless of local laws or practices. We do not approve facilitation payments or monetary contributions to

political parties, candidates for public office, and government officials, nor any political involvement on behalf of ASML, unless required by your role at ASML. On top of that, we need to be vigilant of red flags when it comes to money laundering.

Address conflicts of interest

We have a responsibility to act in the best interests of ASML without being influenced by any personal or other interests. Personal activities or relationships can create, or appear to create, a conflict of interest, and this may harm our reputation and the trust that our business partners place in us. For this reason we avoid any form of conflicts of interest, steering clear of situations where personal interests might compromise our judgment in the workplace, and we proactively disclose any actual or potential conflicts.

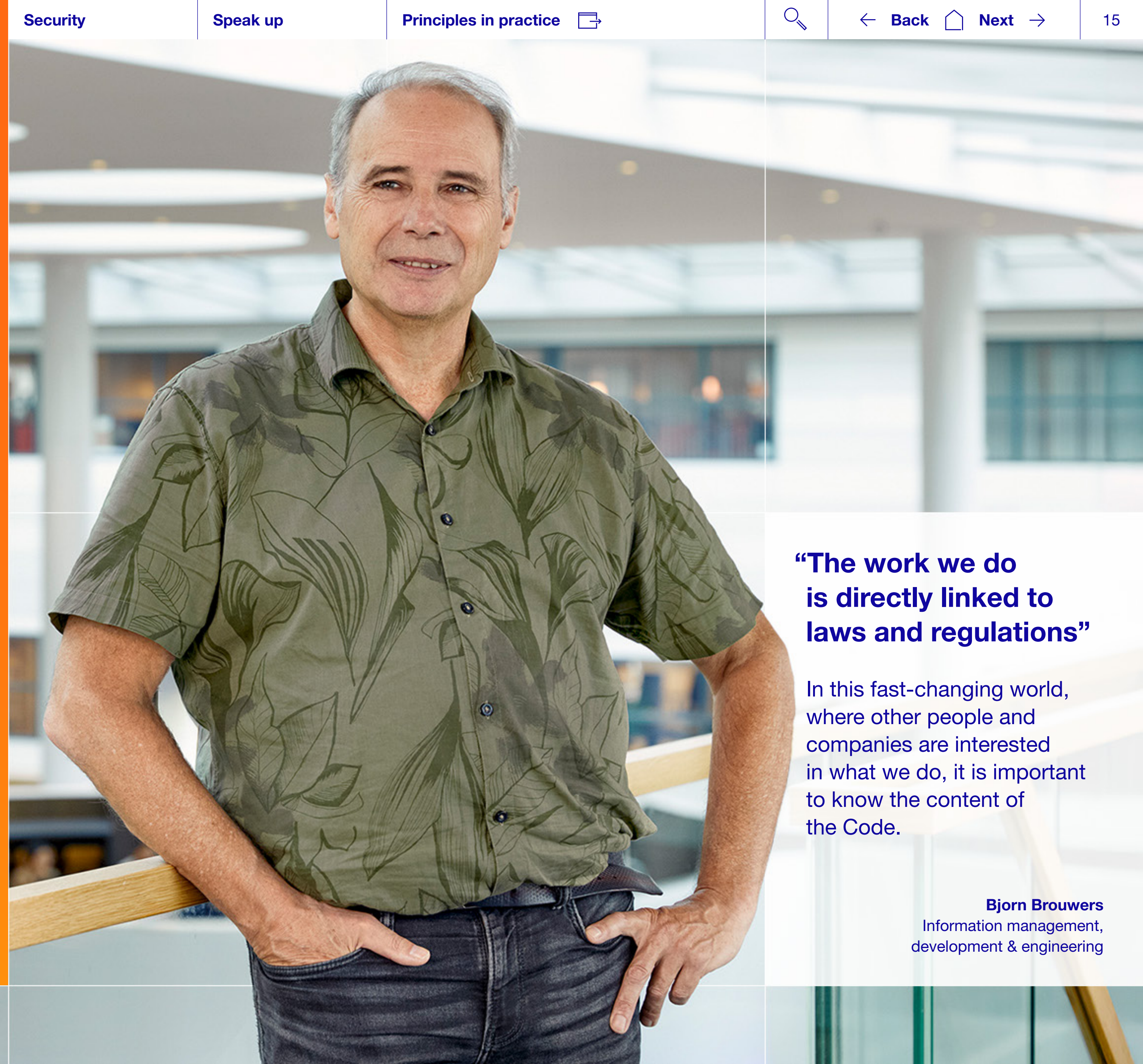
Comply with laws and regulations

We are committed to complying with all applicable laws and regulations, including import and export controls, and sanctions.

We import, export, re-export, transfer, service, broker, finance, sell and purchase goods, software, technologies and services while complying with all applicable import controls, export controls and sanctions laws and regulations. We classify goods, software and technologies in order to identify controlled status and possible restrictions. We implement the requirements and restrictions applicable to our company and employees, as well as the countries, business partners and people we deal with.

We do not engage in any activity that seeks to cover up profits of illegal activities, such as crime or terrorism.

We comply with our [Insider Trading Rules](#) and use them for guidance when trading in ASML shares.



“The work we do is directly linked to laws and regulations”

In this fast-changing world, where other people and companies are interested in what we do, it is important to know the content of the Code.

Bjorn Brouwers
Information management,
development & engineering



“Integrity is the foundation for me as a professional”

We need to make sure that the principles of our Code are not compromised in our daily work for other priorities – for financial results, efficiency, or any other interests.

Qi Ke

Senior finance business partner

Report transparently

We acknowledge the critical importance of honest and ethical conduct in the preparation and publication of financial and non-financial information, including in the field of environmental, social and governance (ESG) sustainability.

We are open and transparent, driving progress while building trust with our stakeholders. We ensure the information we disclose is fair, accurate, timely and understandable and complies with legal and regulatory requirements. We do not make false or misleading statements in any of ASML’s financial or non-financial reports, monitoring reports or other documents submitted to government agencies and investors or published on any media, including advertisements.

We safeguard our assets

Our most valuable assets are our people and knowledge, both of which are highly valued and protected as the backbone of our company. ASML ‘assets’ include intellectual property (intangible assets such as technical know-how, product data, trade secrets and business data) as well as personal data and physical assets (products, tooling, funds and computers for conducting ASML business). We expect anyone entrusted with ASML assets to keep them safe from loss, damage, misuse or theft.



Use ASML assets responsibly

Secure our knowledge

Treat information confidentially

Use ASML assets responsibly

We never use ASML assets for any purpose that violates laws or company policies.

You are responsible for all actions performed through your user account. To protect ASML from serious risks, always ensure that you have the appropriate permissions to use ASML assets or ASML electronic communication services, including email and internet access. If ASML assets are used to generate, access, display or disseminate any material that violates our Code or corresponding policies, or advocates such violation, ASML may need to report this to the relevant authorities. ASML reserves the right to access and disclose electronic communication in accordance with applicable laws.



“We always ask ourselves – is this something that we should protect?”

Whenever we handle ASML technical information, we must be very mindful when sharing it with the outside world and do our utmost to safeguard our most important assets.

Pavan Kapoor
Senior intellectual property attorney



“If we safeguard our knowledge and innovations, we safeguard the future of ASML”

The Code helps you with your line of thinking when making decisions in new situations or when new technology, such as AI, is involved.

Ruud Telman
Cloud and AI security specialist

Secure our knowledge

We uphold a robust set of security controls that must be followed in order to keep our knowledge secure.

If work is not possible due to a security restriction you should inform management and discuss whether adjustments to a process are required rather than fixing it yourself. The violation of security measures can cause major risks and have a big impact our organization. That is why violations are treated very seriously and their impact will significantly influence the possible consequences.

As one of the driving enablers behind developments in artificial intelligence (AI), ASML is committed to developing best practices and ensuring we use this technology responsibly. We recognize the positive effects of this technology and at the same time we are aware of potential risks. For example, the internal use of generative AI comes with notable risks of possible information leakage or the production of inaccurate or distorting information. Our aim is to recognize and address the risks while enabling our employees to benefit from this technological advancement.

Treat information confidentially

We are committed to preventing unauthorized disclosure of information belonging to ASML, its employees, customers or suppliers.

ASML has an outstanding innovative culture and our operations are highly dependent on reliable information processing. It is critical that we ensure the integrity and necessary confidentiality of all our data. Unauthorized disclosure of information belonging to ASML, its customers or suppliers may unfairly benefit competitors, negatively affect ASML’s ability to apply for intellectual property rights (for example, patent rights) and impact our relationship with customers, suppliers and authorities.

ASML respects the privacy of individuals when processing their personal data. We protect personal data and manage it in line with our Privacy Policy and in compliance with applicable laws and regulations.

We expect everyone handling ASML information to act as a role model while safeguarding information in any interactions, including those online.



**“Micro decisions
are what make
the difference”**

They support you in safeguarding ASML assets, securing your work and beyond that, in respecting the people you work with.

Manon Jacobs
Security behavioral awareness lead

We speak up

Communication is key to fulfilling our commitment to uphold the highest standards of integrity described in the Code. We strive to be a workplace that encourages open and professional dialogue among employees as well as with third parties. We foster an environment where it is safe to speak up, where you listen to others with an open mind and refrain from immediate judgment, and trust each other to do the right thing. We encourage everyone to always treat others as you would wish to be treated yourself.



Address violations of the Code

Address violations of the Code

We encourage and expect our employees to speak up when they suspect a violation of our Code, or feel pressured to violate the Code.

To speak up is to raise a concern within ASML about any violation, even suspected, of laws and regulations, our Code or ASML policies and procedures. There are various ways to speak up.

Non-retaliation

In our environment of trust, concerns are treated confidentially (and if necessary, anonymously). Nobody should experience any form of retaliation or any other negative consequences when raising a concern in good faith or for cooperating in an investigation regarding a possible violation of our Code, policies or the law. This is also reflected in our [Speak Up & Non-retaliation Policy](#).



“If you see a potential Code of Conduct violation, speak up through any of the reporting channels”

By speaking up you allow ASML to take action and to resolve potential Code of Conduct violations.

I-Ling Chen
Regional ethics & compliance officer

How to speak up

Aim to resolve before escalating

Before escalating a matter, everyone should challenge themselves – is it possible to resolve the matter without escalation? You can do so by speaking to the people involved and discussing inappropriate behavior in a respectful way.

Raise your concern informally

If you don’t feel comfortable discussing your concerns directly with the people involved or it’s not possible to do so, you can consider discussing the matter with your manager, HR business partner, ASML contact (for third parties) or an ethics liaison. Each of them is able to support you in resolving the matter or by guiding you to the most suitable channel to further discuss your concerns.

Report to the Ethics Office

Report your concern directly to the Ethics Office if you don’t feel comfortable addressing it elsewhere or when it regards a potentially serious violation of our Code that requires immediate attention. You are expected to immediately report (suspicions of) fraud or violations of our Code that could cause immediate harm to ASML or our employees to the Ethics Office.

Use our Speak Up Service

You can report your concern via the [online Speak Up Service](#) or by calling the [toll-free hotline](#). For both channels you can choose to remain anonymous. Our Speak Up Service is also available to third parties who are professionally involved with ASML in order to address a potential violation of the Code by ASML or any of its employees. It is also open to individuals and communities who may be adversely affected by ASML’s activities, to raise any concerns including matters related to human rights.

What happens after you speak up to the Ethics Office

If you report a concern directly to the Ethics Office or via the Speak Up Service you will receive confirmation that the report has been received within seven days.






The Ethics Office will make an initial assessment (triage) to determine things like: Is additional information needed? Is the person who reported willing to discuss the matter further, either directly or anonymously? Has the person who reported indicated that they feel safe? What is needed to proceed?

Based on the initial assessment and available information, the Ethics Office determines whether there might be a violation of the Code by verifying the available facts and how the report can best be followed up on. A report might result in an internal investigation, however the Ethics Office will always try to explore other actions suitable to address the concern or to provide support to the person speaking up.

ASML anonymously reports on violations of the Code in our annual report.



We are ASML

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<h1>Administrative information</h1> <div><h2>ASML – corporate information</h2><p>ASML Holding NV and its Affiliates. Affiliates mean any corporation, company, or other entity that (i) is controlled by ASML, (ii) controls ASML or (iii) is under common control of ASML and another legal or natural person. The term ‘control’ is assumed when the controlled entity’s shares or ownership interest representing the right to make decisions for such entity are owned or controlled, directly or indirectly, by the controlling entity. An entity is considered to be an Affiliate so long as such ownership or control exists.</p><p>We operate in the following regions:</p><p>Asia China, Japan, Malaysia, Singapore, South Korea, Taiwan</p><p>North America Arizona, New Mexico, California, New York, Colorado, Oregon, Connecticut, Texas, Idaho, Utah, Massachusetts, Virginia</p><p>EMEA Belgium, France, Germany, Ireland, Israel, Italy, Netherlands, United Kingdom</p></div>								<h2>Definitions</h2> <div><p>Child The term ‘child’ refers to any person under the age of 15, under the age of completing compulsory education, or under the minimum age for employment in the country, whichever is greatest.</p><p>Conflict minerals Conflict minerals are, in short, minerals sourced from countries suffering from armed-conflict, such as civil war, a state of fragile post-conflict, or witnessing weak or non-existing governance and systematic violations of international law, including human rights. The main minerals concerned are tin, tantalum, tungsten and gold.</p></div>		
			Issued by	ASML Board of Management						
			Policy contact	ASML Ethics Office De Run 6501, 5504 DR Veldhoven, The Netherlands ethicsoffice@asml.com , +31(0) 40 268 94 04						
			Effective date	October 2024						
			Version	1.0						
			Replaces	ASML Code of Conduct dated November 2020						
			Review and amendment	The Code is periodically reviewed by the Ethics Sub-Committee of the Compliance, Ethics, Security and Risk Committee (CESR) as revisions may be required due to changes in law or regulations or changes in our business or the business environment. The Code may be amended by the Board of Management.						
			Related documents	ASML Speak Up & Non-retaliation Policy ASML Code of Conduct: Principles in practice (intranet) ASML corporate policies						
			Industry Standards	Responsible Business Alliance United Nations Guiding Principles on Business and Human Rights OECD Guidelines for Multinational Enterprises The principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles Rights at Work International Bill of Human Rights						
			Note	The Code is leading, but where local laws or regulations are stricter than the Code, they prevail.						