

ASML

Code of Conduct

2020

Introduction



As an industry leader, we realize that our impact extends beyond technology to people, society and the planet. We ask all employees to commit to our Code of Conduct (Code), which is based on the ASML values of challenge, collaborate and care. These values are part of a shared belief system within ASML that defines who we are. They influence how we make decisions and guide us in our interactions with colleagues, customers, suppliers, shareholders and society as a whole.

We are proud of what we have achieved as a company. ASML relies heavily on the skills, commitment and behavior of its employees for its continued success and its contribution to society. That's why we expect that all employees fully live up to the company's values and act with integrity and respect at all times.

This Code sets out the baseline of ethical behavior, enabling employees to make the right decisions and live up to the ASML values. It is a key resource in providing guidance for employees, so that we can always do the right thing and maintain the highest standard of ethics,

integrity and respect. The Code also reflects what is expected of our suppliers, contractors, consultants and other business partners.

We all have a personal responsibility to incorporate the principles of the Code and ASML's values into our work. We should never feel pressured to violate the Code. If that pressure should ever arise, then we urge our employees not to remain silent. ASML encourages you to [Speak Up](#).

Please take the time to familiarize yourself with the content of the Code and the underlying

corporate policies, procedures and regulations and abide by them at all times. Let's show the world that ASML operates with integrity and respect and as a socially responsible corporate citizen by creating a company culture guided by common values.

ASML Board of Management

Reader's guide



Who needs to follow our Code?

The Code applies to all ASML employees, officers and directors, including:

- Board of Management
- Everyone on the payroll
- Those working under the supervision of ASML on our sites

The Supervisory Board of ASML also agrees to adhere to this Code.

Everyone is required to live up to the expectations that we define in the Code. Managers of all levels are expected to lead by example, drive personal and group adherence to our Code, and make sure their direct reports receive appropriate ethical guidance and support.

ASML's suppliers follow the Code by (contractually) committing to implement the [Responsible Business Alliance \(RBA\) Code of Conduct](#). To reinforce our commitment to the supplier network, we expect our key suppliers and their suppliers to comply with the RBA Code of Conduct and to develop their own strategies, policies and processes to follow it. This requirement is included in our long-term product-related suppliers' contracts.

Key principles

Reader's guide



How is the Code structured?

Each of the chapters describe ASML's commitment and principles in this Code and contain the following sections:

- 1 Our commitment, including links to policies that are publicly available and reference to relevant internal policies for information
- 2 Key principles

The Code does not cover all the behaviors we expect based on ASML's [values](#) and principles. There are many more detailed materials, including policies, laws and regulations, that relate to different subject matters covered by the Code. Employees are required to familiarize themselves with this Code, respect the key principles, and abide by the underlying corporate policies, procedures and regulations, including those not listed in this Code, at all times.

Key principles

Reader's guide



How is this Code connected to industry standards?

Since 2011, ASML has been a member of the [Responsible Business Alliance \(RBA\)](#), the world's largest industry coalition dedicated to corporate social responsibility in global electronics supply chains. Our Code is in line with the RBA Code of Conduct, which is a set of social, environmental and ethical industry standards.

Key principles



Reader's guide



Who is required to sign the Code?

All ASML employees, including the Board of Management, are required to acknowledge they have read and understood our Code by signing it and commit to complying with it in their contracts. They are also expected to participate in ethics training and report any potential conflicts of interest or any other possible exception to or violation of the Code. ASML offers support, advice, training and additional guidance via policies and procedures.

Key principles

Reader's guide



What might be considered a violation of the Code?

Everyone is required to live up to the expectations that we define in the Code. A violation is not only about your direct actions and behavior – the following are also considered violations:

- Requesting or permitting others to violate the Code
- Failing to promptly report a known or suspected violation of the Code
- Retaliation against another employee or third party for reporting a suspected violation of the Code
- Failing to cooperate with investigations or audits related to a suspected Code violation
- Failing to complete a required training or certification process regarding this Code
- Failing to maintain confidentiality of any information concerning an ethics case or ethics investigation

Key principles

Reader's guide



What happens if the Code is violated?

Any violation of the Code is taken seriously and could lead to disciplinary action such as demotion, retraining or termination of employment. Any measures taken should be in line with applicable laws and regulations, local policies and procedures.

Key principles



Reader's guide



Who should I contact with questions, concerns or suspected violations of the Code?

ASML encourages you to [Speak Up](#) if you believe or suspect that the Code has been violated. Follow the Speak Up procedure:

- 1 Discuss the issue with the person involved.
- 2 If you don't feel comfortable discussing the issue with the person involved, you may discuss it with your (direct) manager or HR representative (or ASML contact if you are a third party).
- 3 If you would rather talk to someone impartial outside of your team, you can contact any of our Ethics Liaisons or the [Ethics Office](#).
- 4 If you prefer to remain anonymous, you can use ASML's [Speak Up Service](#).

If you have any questions, suggestions or concerns regarding the Code, please contact the [Ethics Office](#).

Key principles

Reader's guide

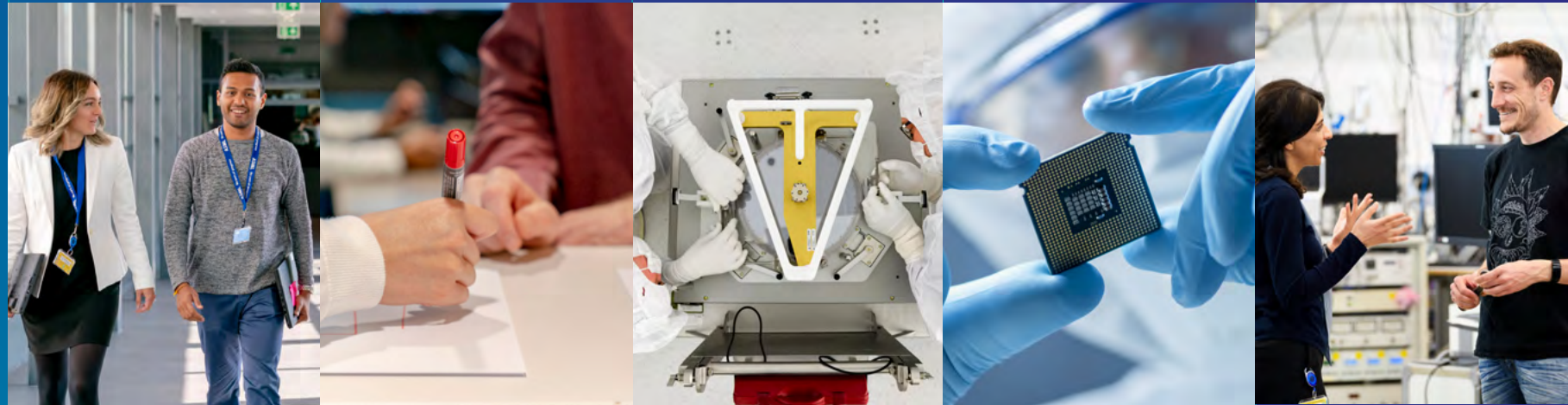


What is non-retaliation?

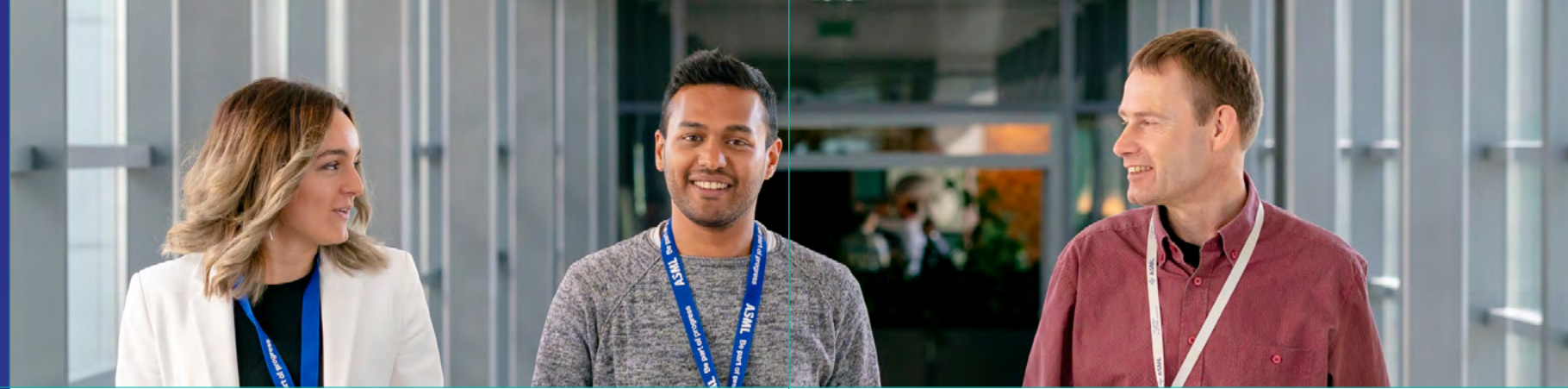
The [Speak Up Policy](#) ensures that those who Speak Up are protected. ASML does not tolerate any form of retaliation against any employee who reports or participates in an investigation of a possible violation of our Code, policies or the law. Living up to our values and the Code creates a working environment where employees can Speak Up in good faith and will not be punished for it. Please contact the [Ethics Office](#) if you have any questions or if you fear retaliation in a specific situation.

Key principles

Our principles



We respect people



Our commitment

ASML is committed to maintaining a safe and healthy working environment. We respect human rights in line with international laws, regulations and standards,¹ such as the RBA Code of Conduct. Diversity of cultures, education and talents make us a stronger, more creative and innovative company. By working together and using these values to guide us, we create an environment based on mutual respect – one that leads to better results than any of us can achieve alone.

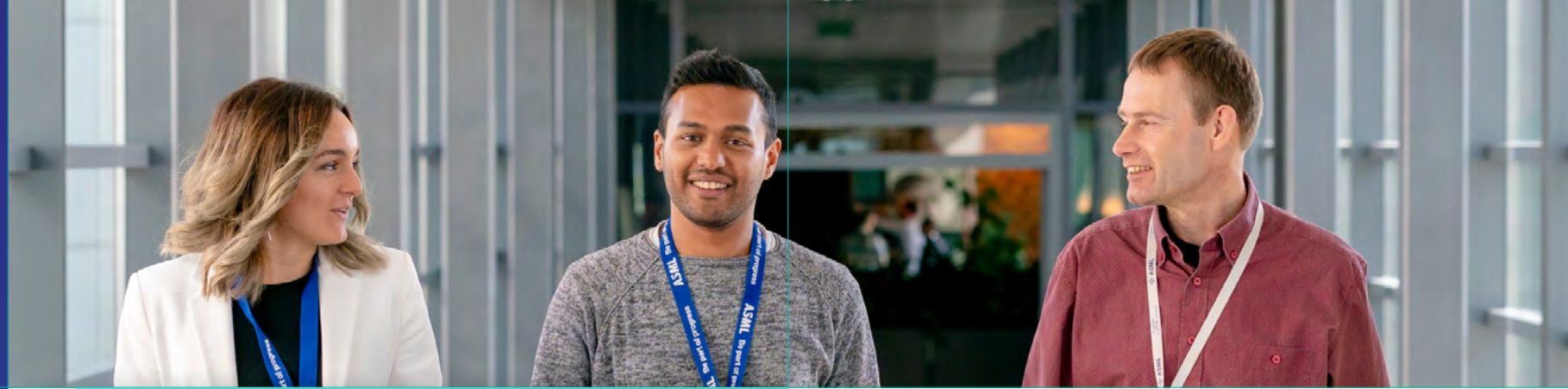
Key principles

Relevant corporate policies

- [Human Rights Policy \(public\)](#)
- [Website privacy notices \(public\)](#)

¹ UN Guiding Principles on Business and Human Rights
International Labour Organization ('ILO') Declaration on Fundamental Principles and Rights at Work, ILO Discrimination (Employment and Occupation) Convention, ILO Forced Labor Convention, ILO Abolition of Forced Labor Convention, ILO Occupational Safety and Health Convention, UN Universal Declaration of Human Rights, UN Global Compact, Organisation for Economic Co-operation and Development's ('OECD') Guidelines for Multinational Enterprises

We respect people



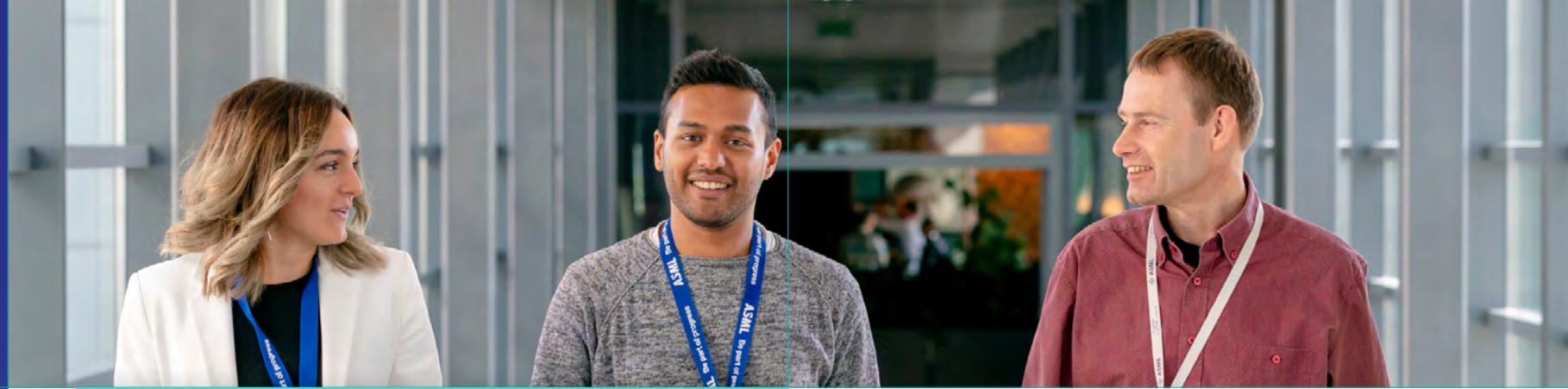
1 ASML employees are treated fairly and equally without discrimination.

Mutual respect, diversity and equality are key to a successful working environment. Cultural identities are respected and valued, and we fully acknowledge individual contributions. All ASML employees, job applicants, contractors and others who are under the supervision of ASML should be treated fairly and equally without discrimination against race, gender (identity or expression), religion, sexual preference, disability, pregnancy, political affiliation, union membership, national or social origin, age or any other characteristics protected by law. ASML provides equal opportunities in recruitment, hiring, training, promotion and compensation.

Key principles



We respect people



2 ASML does not tolerate any form of (sexual) harassment, physical and verbal abuse, mental and physical intimidation, retaliation or any form of aggression or bullying.

We ask everyone to contribute to a workplace free of any kind of inhumane treatment, including any kind of harassment or threats.

Key principles



We respect people



3 Human rights should be respected at all times. This includes, but is not limited to, freely chosen employment, children's rights, women's rights, minority rights and migrant workers' rights.

ASML does not allow forced, (debt) bonded or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons. All work should be voluntary and not subject to mental or physical oppression or duress. Child labor is not permitted in any part of ASML's business.²

Key principles

² 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.

We respect people



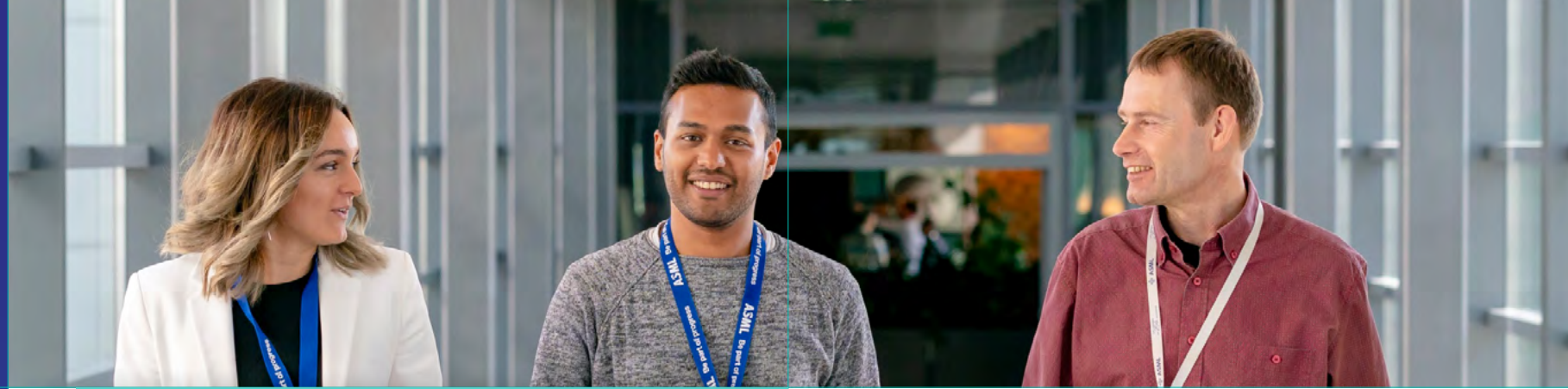
4 Compensation and benefits are fair and balanced.

Compensation and benefits are consistent with the provisions of all applicable wage laws, including those relating to minimum wage, overtime hours, and legally mandated benefits. Excessive, consecutive short-term contracting arrangements with the same employee solely and intentionally to avoid providing regular employment is not allowed.

Key principles



We respect people



5 We respect the privacy rights of employees, customers, suppliers and everyone whose personal data we process.

Personal data is protected and managed in an ethical, fair and lawful manner in line with ASML privacy policies and in compliance with applicable laws and regulations.

Key principles



We operate with integrity



Our commitment

A strong culture of integrity and compliance underpins ASML's business success. We define 'integrity' as acting with honesty, sincerity, care and reliability. Compliance not only means complying with laws and regulations but also adhering to our high ethical standards. Our reputation for integrity is a valuable asset. It is essential that we demonstrate personal and business integrity at all times.

Key principles

Relevant corporate policies

- [Anti-Bribery and Corruption Policy \(public\)](#)
- [Competition Law Compliance Policy \(public\)](#)
- Gifts & Entertainment Policy
- Conflicts of Interest Policy
- Anti-Fraud Policy
- Global Business Travel & Expense Policy
- Insider Trading Rules
- Legal Escalation Policy
- Trade Compliance Policy
- Review and Sign-off Policy
- Delegation of Authority Policy
- P-Card Policy
- NPR Procurement Policy
- Media Relations Policy



We operate with integrity



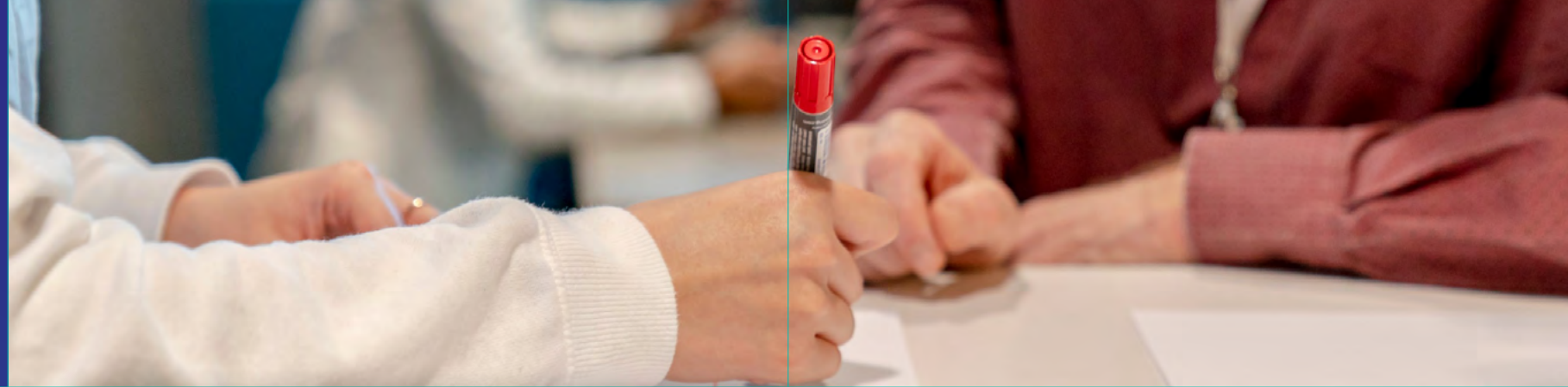
1 ASML is committed to preventing any improper influencing of others or letting others improperly influence us.

We do not tolerate bribery, corruption, or the offering or receiving of improper gifts and entertainment. We always avoid any form of conflicts of interest and never make monetary contributions to political parties on behalf of ASML.

Key principles



We operate with integrity



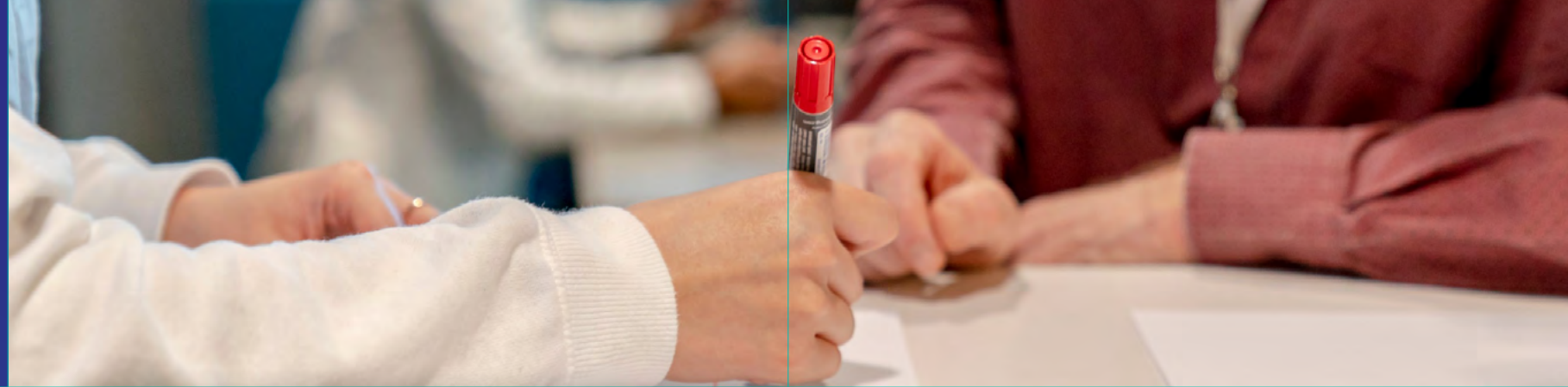
2 We do not tolerate any form of fraud.

We do not tolerate any form of fraud. This includes the manipulation of information, documentation or records. We acknowledge the critical importance of honest and ethical conduct in the preparation and publication of financial and non-financial statements to ensure they are fair, accurate, timely and understandable and comply with legal and regulatory requirements. We will not make false or misleading claims or statements in any of ASML's financial reports, monitoring reports or other documents submitted to government agencies and investors or published on any media, including advertisements. Employees should immediately report fraud (or suspicion of fraud) to their manager and/or to the Ethics Office in accordance with the Anti-Fraud Policy.

Key principles



We operate with integrity



3 We expect our employees to be familiar with, and where applicable comply with, ASML's insider trading rules.

Employees should not trade directly or indirectly in any shares or options of ASML while possessing inside information.

Key principles



We operate with integrity



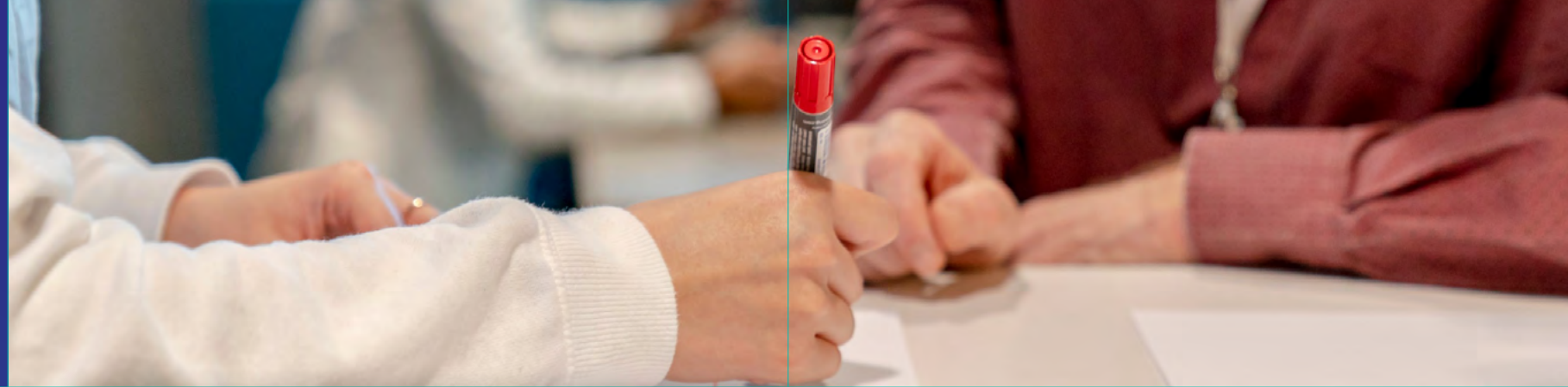
4 We compete vigorously but always in accordance with the standards of fair business and fair competition.

ASML does not allow any form of conduct that is considered illegal under applicable competition laws.

Key principles



We operate with integrity



5 Commitments and obligations from ASML are authorized at the correct management level. All are validated against internal authorization matrices.

Our global system of internal authorizations is detailed in our Review and Sign-off Policy. This provides employees with clear guidance on when and if they can make written or verbal commitments on behalf of the company.

Key principles



We operate with integrity



6 ASML is committed to complying with all applicable export controls and sanctions laws and regulations.

We export, re-export, transfer, service, broker, finance, sell and purchase goods, software, technologies and services while complying with all applicable export controls and sanctions laws and regulations.

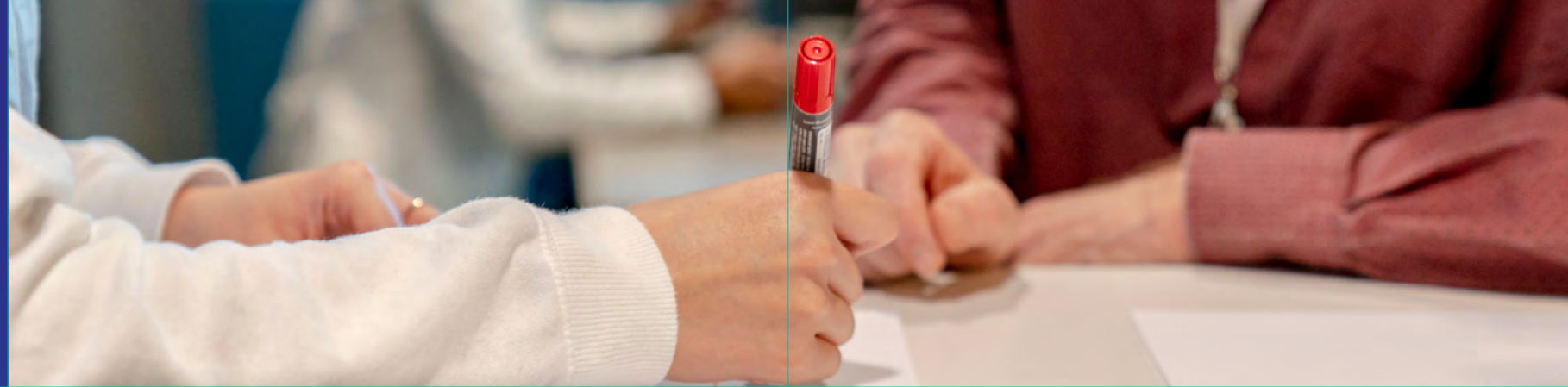
We classify goods, software and technologies in order to identify controlled status and possible restrictions.

We implement the requirements and restrictions applicable to the countries, business partners and persons with whom we deal.

Key principles



We operate with integrity



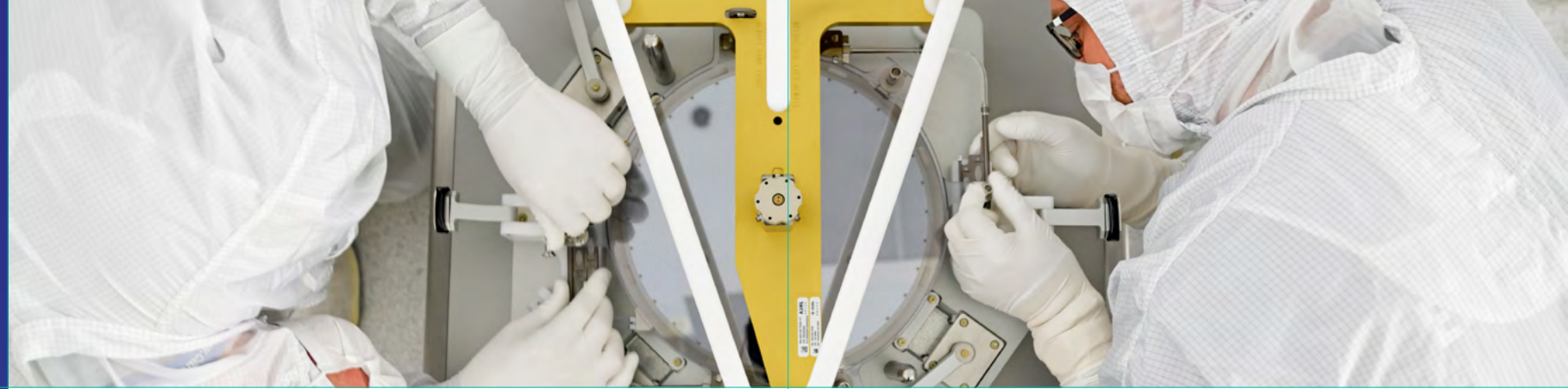
- 7 We do not engage in any process in which persons or groups try to conceal the proceeds of illegal activities, such as crime or terrorism.**

We do not try to make the sources of illegal funds appear legitimate (money laundering). Suspicious transactions are reported to prevent money laundering.

Key principles



We commit to safety and social responsibility



Our commitment

Technology reaches all parts of society. By helping to make chips more affordable and more powerful, ASML has an important role to play – not only by reputation and results but in relation to the environment. That is why ASML is committed to conducting business responsibly, enabling sustainable growth while fulfilling legal and moral obligations. We aim to achieve our business objectives in a caring and responsible manner, as outlined in the key principles.

Key principles

Relevant corporate policies

- [Sustainability Policy \(public\)](#)
- Conflict Minerals Policy
- RoHS Product Compliance Policy
- WW Scrap Policy



We commit to safety and social responsibility



1 ASML puts safety first and is committed to creating a safe place to work.

To prevent, manage, track and report physical injuries and work-related illnesses, we have established procedures and systems such as various channels through which we encourage employees to report, classify and record these cases. We investigate and implement corrective and mitigating measures to eliminate their cause and facilitate employees to return to work.

Key principles



We commit to safety and social responsibility



2 We take responsibility for the social, environmental and economic impact of our activities, while fulfilling our moral and legal obligations.

Sustainability is an integral part of our business. Staying focused on what matters for our business and our stakeholders, as well as society and the planet, is the foundation of our sustainability strategy.

Key principles



We commit to safety and social responsibility



3 ASML works with its suppliers to understand how products are sourced and to ensure that the principles of sustainability are upheld.

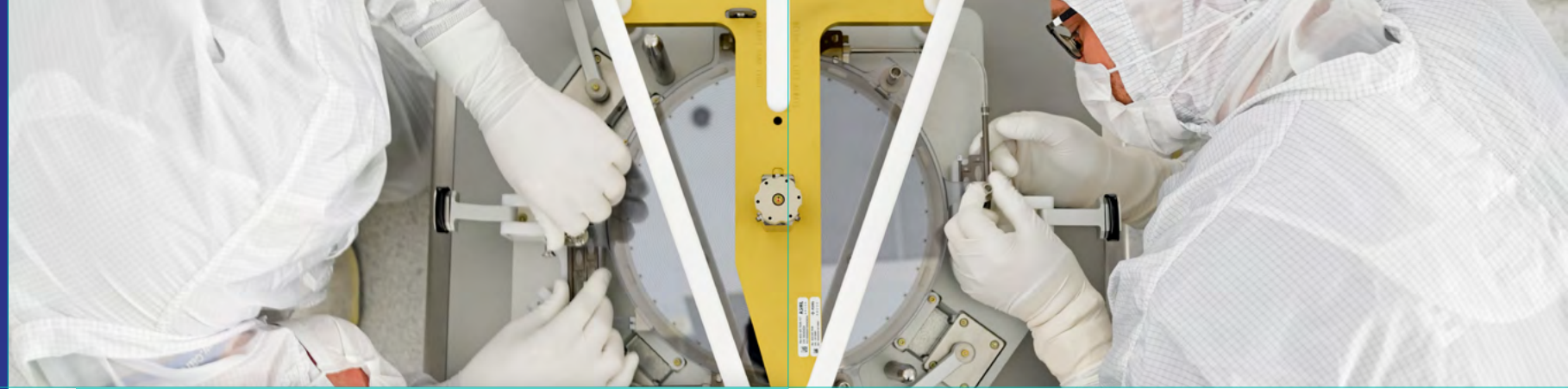
We encourage our supply chain partners to meet requirements for sustainability set out by the [Responsible Business Alliance](#). We also perform other activities, such as collecting information on the sourcing of conflict minerals³ in products.

Key principles

³ Conflict minerals are, in short, minerals mined in the Democratic Republic of the Congo or any neighboring countries under conditions of armed conflict and human rights abuses. The four main minerals concerned are tin, tantalum, tungsten and gold, collectively referred to as 3TG.



We commit to safety and social responsibility



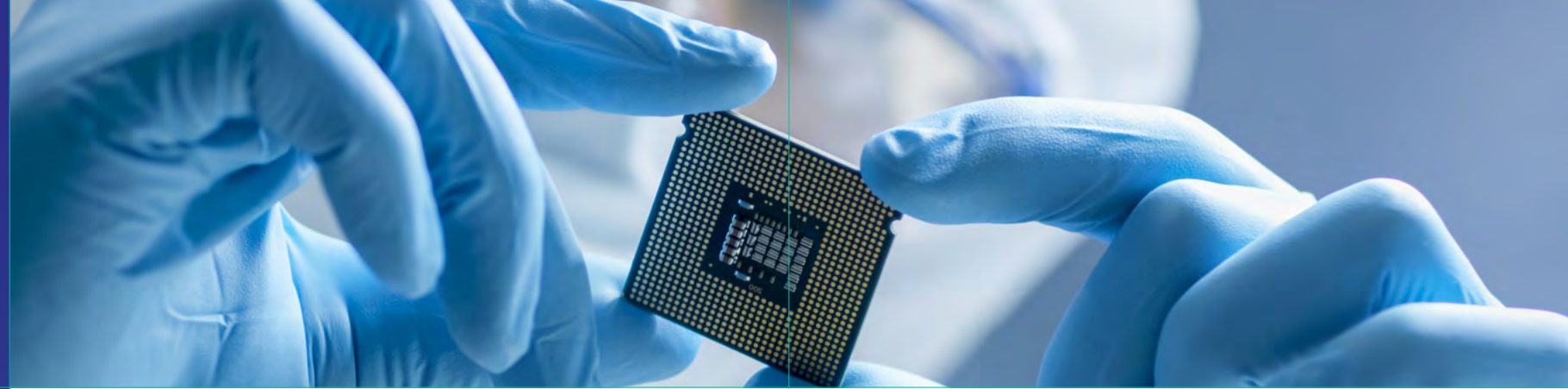
4 We contribute to the communities in which we operate.

ASML is committed to having a positive impact on the communities in which we operate, creating additional social value by giving back to society. We believe in collaborative, consultative and partnership-based approaches to our community involvement. The independent [ASML Foundation](#) funds various education programs and supports charities through collaborative and consultative partnerships with neighboring communities.

Key principles



We protect our assets



Our commitment

ASML's most valuable assets are its people and knowledge, both of which are highly valued and protected. Our 'assets' also include intellectual property (IP), which refers to intangible assets such as technical knowhow, product data, business data, and personal data, as well as physical assets such as products, tooling, funds and computers for conducting ASML business. Our company expects anyone entrusted with ASML assets to keep them safe from loss, damage, misuse or theft.

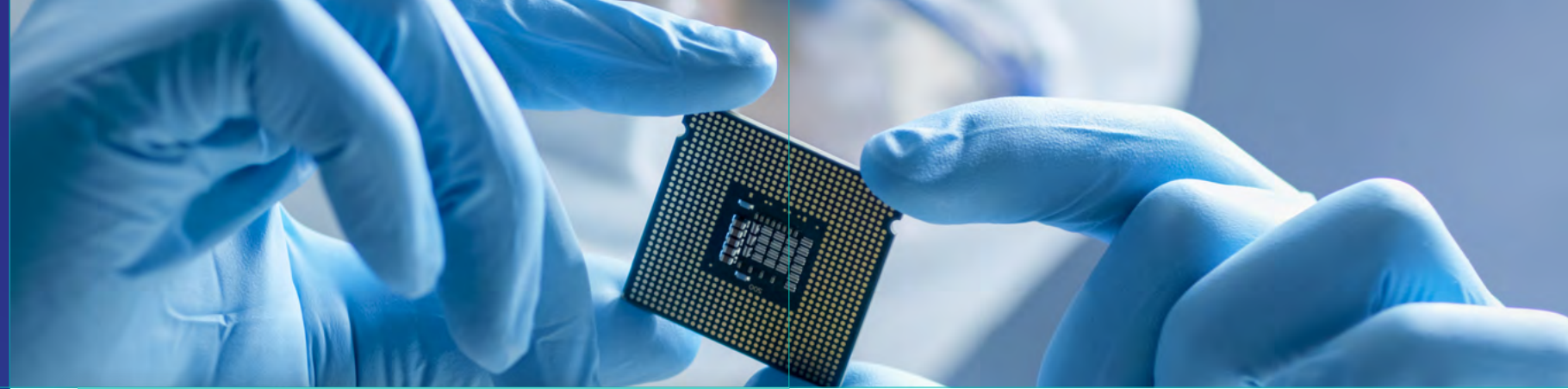
Relevant corporate policies

- Quality Policy
- Information Security Policy
- Knowledge Protection Policy
- Handling Supplier Confidential Information Policy
- Acceptable Use of IT Systems Policy
- Acceptable Use of Smartphones and Tablets
- Data Retention Policy

Key principles



We protect our assets



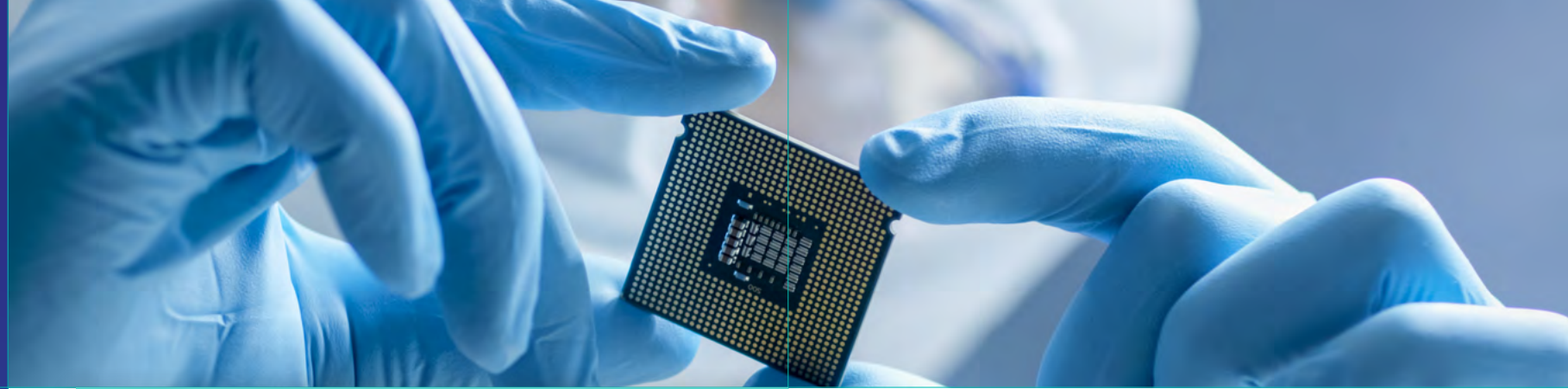
1 ASML assets are not used for purposes that violate the law or company policies.

Using ASML assets (such as IT hardware or ASML electronic communication services, including email and internet access), without the appropriate authorizations by management could create a serious risk for ASML and must be avoided at all times. If ASML assets are used to generate, access, display, or disseminate any material that violate or advocate the violation of this Code, ASML may need to report this to the relevant authorities. ASML reserves the right to access and disclose electronic communication, while respecting national and international standards regarding privacy, if needed to protect its assets. You will be held responsible for all actions performed through your user account.

Key principles



We protect our assets



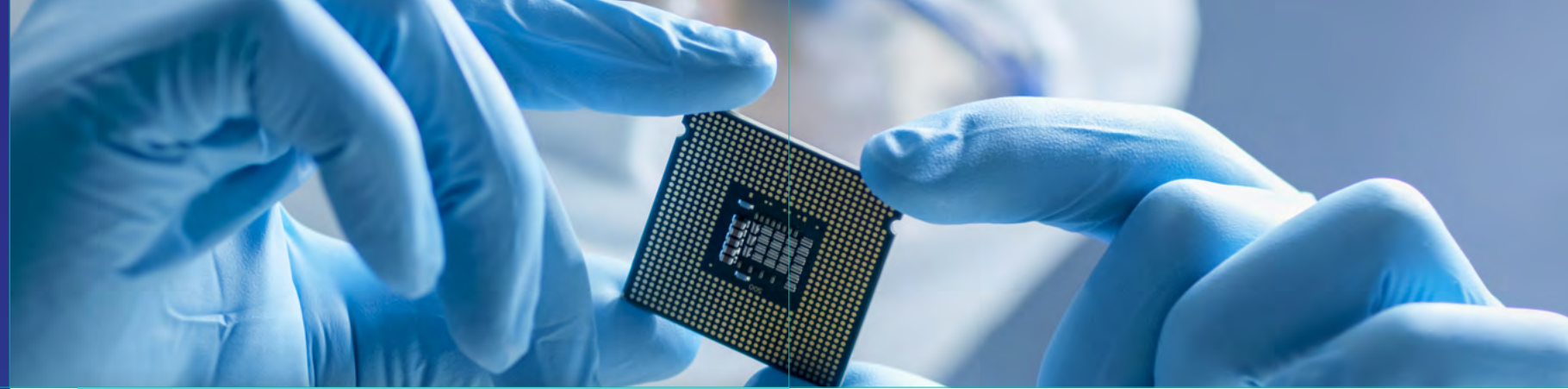
2 Confidentiality of information is of the utmost importance to us.

While acknowledging that ASML's operations are highly dependent on reliable information processing, it is also critical we ensure the integrity and necessary confidentiality of all our data.

Key principles



We protect our assets



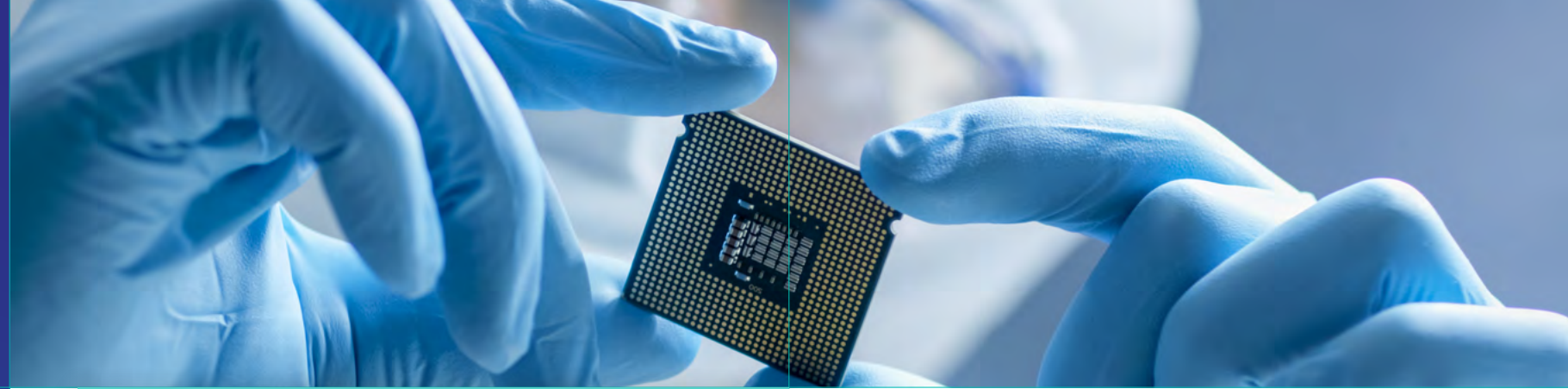
3 ASML is committed to preventing unauthorized disclosure of information belonging to ASML, its customers or suppliers.

Unauthorized disclosure of information belonging to ASML, its customers or suppliers may benefit competitors, negatively affect ASML's ability to apply for IP rights (e.g. patent rights), or affect our relationship with customers and suppliers. Any (possible) information leakage should be reported in line with our Information Security Policy.

Key principles



We protect our assets



4 Quality is an integral part of all activities performed within ASML.

Quality is essential for our technology leadership. It is reinforced by a company-wide quality culture to ensure the high performance of our products, continuous process improvement, and dedication of suppliers and our people.

Key principles



We encourage you to communicate and Speak Up



Our commitment

ASML has a Speak Up Policy which is applicable to everyone working for or on behalf of ASML worldwide. To fulfill our commitment to upholding the high standards of integrity described in this Code, communication is key. We strive for a working environment that encourages open dialogue among employees – as well as between employees and third parties – where they feel comfortable, respected, and that they trust each other to do the right thing. In this environment of trust, we uphold a clear non-retaliation policy, which means you will never be punished when you raise a concern in good faith.

You may one day observe behavior that violates our Code. ASML values and encourages employees who identify and Speak Up about a potential violation. By doing so, they give their colleagues, managers, counterparts and ASML 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.

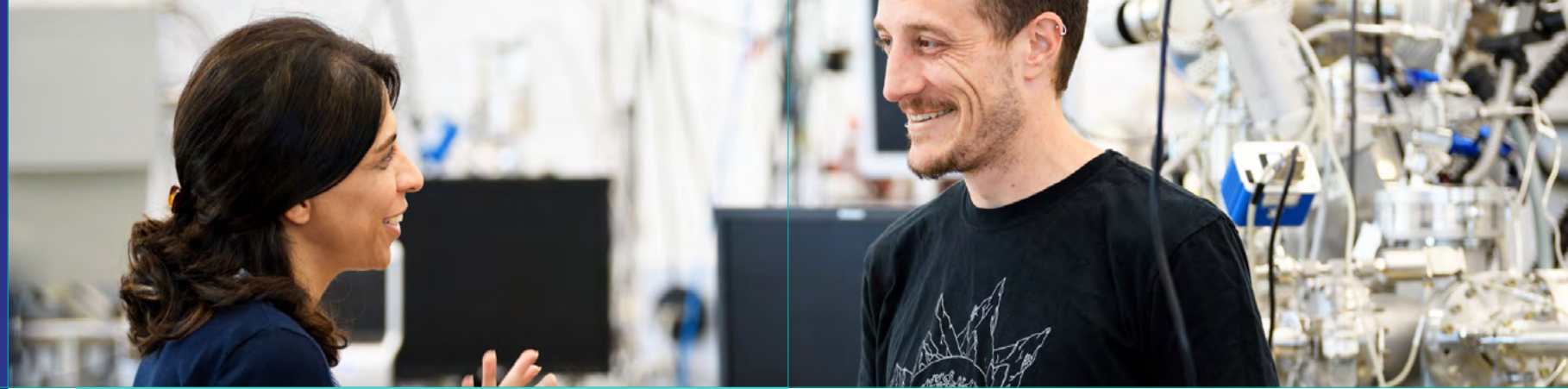
Relevant corporate policies

- [Speak Up Policy \(public\)](#)
- Ethics Complaints Investigation Procedure
- Media Relations Policy
- Policy on Corporate Policies
- Legal Escalation Procedure

Key principles



We encourage you to communicate and Speak Up



1 ASML has a Speak Up Policy which is applicable to everyone working for or on behalf of ASML worldwide.

Our [Speak Up Policy](#) is a whistleblowing policy that can be used by everyone working for or on behalf of ASML worldwide. It is also available to any person or party with whom ASML has or has had a business relationship (such as business partners, suppliers, contractors, visitors, shareholders, agents, distributors, representatives and customers). The Speak Up Policy explains when, how and where you can raise concerns about a suspected violation in confidence, respecting privacy and without fear of retaliation.

Key principles



We encourage you to communicate and Speak Up



Our commitment and key principles

2 Concerns can be reported anonymously via the Speak Up Service.

The [Speak Up Service](#) is managed by an external and independent provider. This service acts as a confidential, secure and anonymous (if necessary and possible in the respective jurisdiction) communication channel between the reporter of a concern and the Ethics Office.

Key principles



We encourage you to communicate and Speak Up



3 ASML values and encourages employees who identify and Speak Up about a potential violation.

By Speaking Up, you give ASML the opportunity to deal with the issue proactively. Remaining silent about possible misconduct can worsen a situation and decrease trust.

Key principles



We encourage you to communicate and Speak Up



4 ASML does not tolerate any form of retaliation.

Those who Speak Up will be protected. Concerns are treated confidentially (and if necessary anonymously). ASML does not tolerate any form of retaliation or any other form of adverse consequences against employees for raising concerns about suspected violations in good faith, even if ASML loses business as a result.

Key principles



We encourage you to communicate and Speak Up



5 ASML will take (suspected) violations of the Code seriously and investigate accordingly.

The [Speak Up Policy](#) describes what you can expect from ASML when you Speak Up and what possible steps will be taken after you raise a concern or file an ethics complaint. Appropriate action will be taken if a violation is confirmed.

Key principles



How to Speak Up



How to Speak Up

ASML encourages you to Speak Up and, where possible, discuss your dilemma or concern with the person involved, your manager or HR representative.

If you do not feel comfortable doing this, want to remain anonymous, or are just not sure who speak to, you can contact one of our [Ethics Officers](#) or Ethics Liaisons directly.

Ethics Liaisons are employees who support the Ethics Office around the world. They serve as trusted representatives and act as a local first point of contact that any employee can turn to for questions and concerns related to ethics.

Ethics Officers are part of the Ethics Office. They can answer all queries relating to the Code as well as investigate and follow up on any issues raised. Contact an [Ethics Officer](#) to ask a question or file your concern.

Alternatively, you can contact our [Speak Up Service](#), which is provided by an independent, outside company. This service enables you to leave your message via a phone call or the online portal and then receive feedback from an ASML Ethics Officer within the system. You can choose to do this anonymously if preferred.

I want to report an issue. What should I do?

Do you feel comfortable speaking up yourself to the person(s) involved?

Yes

Discuss with the **person(s) involved**. Remember to take ASML's values into account and be respectful.

No

Do you feel comfortable discussing the issue with your direct manager or your HR representative?

Yes

Discuss with your **direct manager or HR representative**. They can help you define the next steps.

No

Do you want to remain anonymous?

Yes

Use our **independent Speak Up Service**.

No

Contact an **Ethics Liaison** or the **Ethics Office**.

An **Ethics Officer** will look into the issue.



Administrative information

Issued by	ASML Board of Management
Policy contact	ASML Ethics Office De Run 6501 5504 DR Veldhoven The Netherlands ethicsoffice@asml.com +31 40 268 94 04
Effective date	November 1, 2020
Version	2.0
Replaces	ASML Code of Conduct and Business Principles dated October 2016
Review and amendment	The Code is periodically reviewed and approved by the Ethics Board on behalf of the Board of Management as revisions may be required due to changes in law or regulations or changes in our business or the business environment.
Related documents	ASML Speak Up Policy ASML Ethics Charter ASML corporate policies
Note	The Code is leading, but where local laws or regulations are stricter than the Code, they prevail.

