

ASML HOLDING N.V.
STAKEHOLDER ENGAGEMENT POLICY
(effective as of 1 December 2023)

1 INTRODUCTION AND PURPOSE

To ensure that the interests of the relevant stakeholders of ASML are considered when the sustainability aspects of the strategy are determined, the company has drawn up this Stakeholder Engagement Policy, in line with best practice provision 1.1.5 of the Dutch Corporate Governance Code. Engagement with Stakeholders may also take place for other purposes.

This Stakeholder Engagement Policy applies to the ASML Group; however region, business unit or stakeholder specific policies on Stakeholder engagement may apply instead of, or in addition to this Stakeholder Engagement Policy.

Nothing expressed or referred to in this Stakeholder Engagement Policy will be construed to give any Stakeholder any legal right or claim under or with respect to this Stakeholder Engagement Policy.

Capitalized terms used in this Stakeholder Engagement Policy have the meaning set out in the [Annex](#).

2 IDENTIFICATION OF RELEVANT STAKEHOLDERS AND ENGAGEMENT COUNTERPARTIES

2.1 Identification of key Stakeholders

In view of ASML's business and operations, ASML has identified the following key Stakeholders:

- (a) **Customers** – buyers of ASML's goods and services;
- (b) **Employees** – persons working for or on behalf of ASML;
- (c) **Shareholders** – shareholders, (potential) investors, analysts (financial and ESG);
- (d) **Suppliers** – person or organization that provides ASML with products, materials and services; and
- (e) **Society** – society at large, the communities in which ASML operates, governments.

2.2 Stakeholder mapping

The Engagement Owner will identify the relevant Stakeholders with regard to the subject of the engagement, taking into account the criteria set out in paragraph 2.3.

2.3 Identification of relevant Stakeholders

In identifying relevant Stakeholders to engage on a specific topic, the Engagement Owner will consider, *inter alia*, the following attributes of Stakeholders in respect of such topic:

- (a) **Dependency** – groups or individuals who are directly or indirectly dependent on the ASML Group's activities, products or services and associated performance, or on whom the ASML Group is dependent in order to operate;
- (b) **Responsibility** – groups or individuals to whom the ASML Group has, or in the future may have, legal, commercial, operational or ethical/moral responsibilities;
- (c) **Tension** – groups or individuals who need attention from the ASML Group with regard to financial, wider economic, social or environmental issues;
- (d) **Influence** – groups or individuals who may have an impact on the ASML Group's strategic or operational decision-making; and
- (e) **Diverse perspectives** – groups or individuals whose different views can lead to a new understanding of the situation and the identification of opportunities for action that may not otherwise occur.

2.4 Engagement Counterparty identification

Following the identification of the relevant Stakeholders, the Engagement Owner will identify potential Engagement Counterparties from among the identified Stakeholders. In doing so, the Engagement Owner may consider, *inter alia*, the following elements:

- (a) the Stakeholder engagement risks as referred to in paragraph 5;
- (b) the interests of the potential Engagement Counterparty;
- (c) the expertise of the potential Engagement Counterparty;
- (d) the level of influence of the potential Engagement Counterparty;
- (e) the reputation of the potential Engagement Counterparty;
- (f) earlier experiences with the Engagement Counterparty;
- (g) the willingness of the potential Engagement Counterparty to engage; and
- (h) the potential Engagement Counterparty's expectations of the engagement.

Those who, through regulation, custom, culture or reputation, can legitimately claim to represent any Stakeholder interests as well as the interests of the voiceless, such as future generations and the environment may also qualify as Engagement Counterparty. Representatives are expected to be open about how they communicate with their constituencies and how they bring in their constituents' voices.

If warranted and notwithstanding statutory obligations to do so, the Engagement Owner may identify employee participation bodies of the ASML Group as an Engagement Counterparty.

3 ENGAGEMENT METHODS

The Engagement Owner shall determine the method(s) of engaging with the Engagement Counterparty that are best suited to the purpose of the engagement and to the Engagement Counterparty. The engagement methods may include, without limitation: written correspondence, one-on-one interviews, roundtables and expert meetings, customer, supplier and investor meetings and calls, industry and investor conferences, employee meetings, portals and hotlines, community outreach programs, and governmental and regulatory interactions.

4 ENGAGEMENT REPRESENTATIVE

4.1 Key Stakeholders

For the key Stakeholders as identified in paragraph 2.1, the following departments of the ASML Group will be involved in the engagement or the preparation thereof:

- (a) ***Customer Solutions & Support*** in relation to the Customers;
- (b) ***Human Resources*** in relation to the Employees;
- (c) ***Investor Relations*** in relation to the Shareholders;
- (d) ***Strategic Sourcing & Procurement*** in relation to the Suppliers; and
- (e) ***Government & External Affairs*** and ***Society & Community Engagement*** in relation to Society.

4.2 Company Representative

The Engagement Owner shall determine the person(s) representing the ASML Group during a specific engagement with Stakeholders, taking into account their expertise, background, seniority and authority to take decisions.

5 ENGAGEMENT DECISION

The Engagement Owner shall assess potential risks associated with the engagement, prior to selecting the Engagement Counterparty, and the scope and method of the engagement.

Based on such assessment, the Engagement Owner will determine whether the engagement is in the interest of the Company and its affiliated enterprise. If it is not, the engagement will not be entered into.

6 (REQUEST FOR) ENGAGEMENT INVITATION

6.1 Content of the invitation

The Engagement Owner shall invite Engagement Counterparties to engage, which invitation shall specify the purpose and scope of the engagement.

6.2 Request for an invitation

Individuals, groups and organisations who would like to engage with the ASML Group as Engagement Counterparty can contact the ASML Group. In addition to other channels that may be available to such individuals, groups or organisations the ASML Group can be reached via ASML's Investor Relations at investor.relations@asml.com.

7 ONGOING MONITORING

The Board of Management shall systematically monitor and evaluate the overall quality of the engagement, and the Engagement Owner shall evaluate the quality of individual engagements.

8 DISCLOSURE OF INFORMATION

To ensure an effective engagement and in order to assure that the Engagement Counterparty receives sufficient, consistent and timely information, the Engagement Owner shall disclose information in an accurate, transparent and comprehensive manner. The Engagement Counterparty shall be requested to adhere to the same principles with regard to the disclosure of information to the Engagement Owner.

The Engagement Owner shall not disclose inside information or company-confidential information. Before the Engagement Owner engages with the Engagement Counterparty, ASML shall have taken such measures that, should inside information or company-confidential inside information be disclosed, ASML will be able to deal with this situation in an appropriate and responsible manner and in accordance with applicable laws and regulations.

9 DOCUMENTING AND PUBLIC REPORTING

9.1 Documenting of engagement outputs

The Engagement Owner shall document the engagement and its outputs and where appropriate develop an action plan that articulates how the ASML Group will respond to the outputs of the engagement.

If considered appropriate by the Engagement Owner, the Engagement Owner may communicate the key elements of the report and action plan to the Engagement Counterparty.

9.2 Public reporting on Stakeholder engagements

ASML may publicly report on its engagements to give insight into the scope and breadth of the outreach, and to demonstrate how the engagements contributed value to the ASML Group's strategy and operations, all subject to the reporting framework applicable to the Company.

9.3 Reporting on the engagement by the Engagement Counterparty

As a condition to entering into the engagement process, the Engagement Owner may request the Engagement Counterparty to commit that such Engagement Counterparty shall not publicly report on the engagement without the prior written consent of the Engagement Owner.

10 SHAREHOLDER ENGAGEMENT

For bilateral contacts between shareholders and the Company, the Company refers to its Bilateral Contacts Policy, which is published on ASML's website.

11 OTHER

ASML's contacts with stakeholders in accordance with this Stakeholder Engagement Policy will at all times be conducted in compliance with applicable rules and regulations.

The Board of Management is authorized to amend or revoke this Stakeholder Engagement Policy at its sole discretion. The Board of Management may occasionally deviate from this Stakeholder Engagement Policy.

This Stakeholder Engagement Policy was adopted by the Board of Management on [date] 2023 and came into effect on [date] 2023.

Any requests for contact with ASML by stakeholders or any questions about this Stakeholder Engagement Policy may be sent to ASML's Investor Relations at investor.relations@asml.com.

ANNEX Definitions

ASML or the Company	means ASML Holding N.V.
ASML Group	means the Company and the ASML Group Companies
Bilateral Contacts Policy	means the Company's policy regarding bilateral communications with shareholders
Board of Management	means the board of management of ASML
Engagement Owner	means the Board of Management or such other representative designated by or on behalf of the Board of Management that is conducting or initiating the engagement process on behalf of the Company, another Group Company or the ASML Group as a whole
Engagement Counterparty	means the counterparty of the Engagement Owner in the engagement
Group Company	means a Company's group company as referred to in article 2:24b of the Dutch Civil Code
Stakeholders	means those groups and individuals that, directly or indirectly, influence – or are or can be influenced by – the attainment of the Group's objectives
Stakeholder Engagement Policy	means this stakeholder engagement policy