

A decorative graphic of multiple thin, light blue lines that originate from the left side of the page and curve downwards and to the right, ending in a point on the right side. These lines create a sense of motion and depth, framing the central text.

ASML Anti-Bribery and Anti-Corruption Policy

Public

Commitment

ASML's core values – challenge, collaborate, care – and the reputation of the entire ASML organization are reflected by our daily behavior. It is therefore essential to demonstrate personal and business integrity by not improperly influencing others or letting them improperly influence you. This Anti-Bribery and Anti-Corruption Policy (**Policy**) demonstrates ASML's ongoing commitment to prevent bribery and corruption as well as to ensure compliance with applicable laws prohibiting domestic and foreign bribery and corruption and with [ASML's Code of Conduct and Business Principles](#) (**Code of Conduct**).

ASML upholds a 'zero tolerance' principle towards bribery and corruption. ASML never justify any act of corruption or any behavior that is illegal or contrary to our Code of Conduct.

This Policy is designed as an umbrella policy for other ASML policies and procedures which incorporate (in whole or in part) the topic of anti-bribery and anti-corruption within our company and aims to ensure consistent mitigation of any possible anti-corruption risks.

ASML employees (any person on ASML's payroll or any temporary worker who is under ASML's supervision or control, including officers and directors) (**Employees**) and business partners who interact with or on behalf of ASML are expected to comply with the ASML Code of Conduct and this Policy.

The Code of Conduct and this Policy are leading, but where local laws or regulations are stricter than the Code of Conduct or this Policy, they prevail.

Any questions or concerns regarding this Policy (including suspected corrupt activities) can be directed to ASML Corporate Ethics Office (ethicsoffice@asml.com) or the [ASML Speak Up Service](#).

What is corruption and bribery?

Essentially, corruption is an abuse of entrusted power for private and/or economic gain. Corruption can manifest itself in bribery and/or undesirable (appearance of a) conflict of interest.

Bribery is best described as follows: the offering, giving, promising, receiving, accepting, authorizing or soliciting of any financial or other advantage to, by or for a person or entity in order to obtain or retain a business or other improper advantage. Bribery often includes (i) kicking back a portion of a contract payment to another party, so called 'illegal kickbacks', and/or (ii) using intermediaries such as agents, subcontractors or other third parties to channel payments to another party.

Key principles

ASML strictly prohibits bribery and corruption in all its forms. This means, amongst others, that ASML does not allow Employees to:

- solicit, arrange or accept bribes intended for personal benefit or that of the respective person's family, friends or acquaintances or act on behalf of ASML to cooperate in the payment or receipt of facilitation payments;
- offer or receive gifts, hospitality or entertainment that are not reasonable, appropriate and proportionate, and/or whenever this could affect or be perceived to improperly influence the outcome of business transactions;
- hold outside positions if fulfilling them may lead to a conflict of interest or enter into an agreement on behalf of ASML with business partners if that could be perceived as a conflict of interest;

- give or give rise to (potentially) unjustified preferential treatment to family, friends and acquaintances or the appearance thereof;
- make monetary contributions, on behalf of ASML, to political parties, organizations or individuals engaged in politics; and/or
- enable corrupt offers, promises, or payments indirectly through third parties acting on behalf of ASML.

Organizational measures

ASML has general and specific control measures in place to prevent, detect and disclose potential bribery and corruption issues. These measures are grouped in the following categories, including but not limited to:

Policy review and anti-corruption risk assessment

ASML reviews this Policy periodically. The Policy review is a result of a risk assessment of relevant focus areas related to anti-bribery and anti-corruption. This assessment identifies and takes into account risks that may be present from an anti-bribery and anti-corruption perspective, which controls have been put into place, what the remaining risks are, and if it has been decided to do so, which measures will be taken in order to mitigate any remaining risks.

Training and awareness

ASML has embedded anti-bribery and anti-corruption training in its compliance and ethics training program. Trainings are tailored to relevant functions and possible risks, such as geographical risks. Awareness of relevant topics and issues relating to anti-bribery and anti-corruption is also promoted by periodic communications, for example, through presentations and articles on ASML's intranet or by email communications.

Reporting and resolving an issue, violation or complaint

Any act of an Employee or business partner contrary to this Policy shall be regarded as a significant breach of ASML's Code of Conduct. Consequently, this may lead to appropriate disciplinary measures, including dismissal.

ASML will support Employees and business partners who refuse to give or receive bribes, as clearly stated in our Speak Up Policy as well. ASML does not tolerate any form of retaliation or other form of adverse consequences against Employees refusing to give or receive bribes or against those who Speak Up, even if ASML loses business as a result.

Employees, business partners and/or any third party can report any issue, violation or concern related to this Policy by contacting ASML Corporate Ethics Office (ethicsoffice@asml.com) or via the [ASML Speak Up Service](#). This is a secure reporting system operated by an independent third-party service provider, which allows for anonymous reporting and is available 24 hours per day.

Any issue or potential issue related to bribery or corruption raised in internal and/or external audit reports will be adequately investigated and remediated. Significant breaches will be reported and disclosed if necessary.

Document processing and retention

ASML has robust document processing and record retention policies in place to ensure ASML maintains and retains accurate records which properly and fairly document relevant transactions and activities. In line with these policies, documents and records are readily available, demonstrable and retrievable for any (internal or external) audit and/or investigation.

Business partners

ASML expects its business partners (such as customers, suppliers, consultants, contractors, intermediaries etc.) to demonstrate high standards of ethical behavior which are consistent with our own. ASML will not engage in business or cooperate with business partners who use bribery or corruption in their relationship with ASML or while acting on behalf of ASML.

ASML expects its Employees to carefully select business partners who interact with or on behalf of ASML. This includes making sure that payments made by ASML to business partners involved in business transactions are proper, legal, and reasonable in nature and the value of the transactions is proportionate to the goods or services provided by these business partners to ASML.

In order to assess the standards which our business partners implement in their businesses, ASML conducts risk-based business partner assessments. Determining whether to perform an assessment and its comprehensiveness depends on the type and risk of a business partner.

Employees

ASML's approach in hiring new Employees, performance management, remuneration and promotion is reflected in ASML's Code of Conduct, policies, procedures and processes. Employees are expected to act ethically, in line with ASML's Code of Conduct.

Any exchanges of gifts and entertainment must always be reasonable, appropriate and proportionate and within the boundaries of ASML's Gifts & Entertainment Policy. Employees may not accept or offer gifts or entertainment that might appear to place them under any obligation.

Outside positions performed by Employees must not impede an Employee's integrity or objectivity in carrying out his or her job, nor pose a risk for ASML. Employees should disclose any potential conflict of interest and are not permitted to engage in outside positions (which could also be an outside financial interest) unless ASML has given its express prior written permission.

Facilitation payments

Facilitation payments are payments that are used to expedite actions to which the payer is in fact already entitled or other payments made to a government official to secure or speed up actions. Employees are in principle not allowed to accept or provide facilitation payments unless a potential health and/or safety risk is involved. In addition, when a government official or third party can provide a formal receipt of written confirmation of a payment's legality, this is not considered a facilitation payment.

Donations and sponsorships

ASML strives to be a good corporate citizen and is committed to making a positive impact on our local and global communities. This is envisaged to be achieved via the ASML Foundation and Corporate Sponsoring, which also support the work of others in these areas. The ASML Foundation and Corporate

Sponsoring carefully select the organizations they wish to support and apply risk-based business partner assessment if deemed necessary.

Administrative Information

Policy Owner	ASML Corporate Legal Department
Policy Contact	ASML Corporate Ethics Office De Run 6501, 5504 DR Veldhoven, The Netherlands ethicsoffice@asml.com +31(0)40 268 94 04
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Version	Public version 1.0 This document is derived from the internal ASML Anti-Bribery and Corruption Policy
Review and amendment	This Policy is periodically reviewed and approved by the Ethics Board as revisions may be required due to changes in law or regulations, or changes in our business or the business environment
Related Documents	ASML Code of Conduct and Business Principles ASML Speak Up Policy ASML Gifts & Entertainment Policy ASML Conflict of Interest Policy (draft only)