

SEMI Global Code of Conduct

Respect, Inclusion, Tolerance

CREATED JULY 2021

A Message from our CEO

Doing things right is one of our most important values at SEMI. As SEMI employees and stewards of the company, we work hard every day to provide services that enhance members' businesses in our global industry community.

We are clear about what we mean when we talk about doing things right. Not only does it mean that we provide services and support with ethics and integrity in mind, but we also monitor our entire operation for compliance with our code of conduct.

Working here means making a commitment to uphold our company values and following the code of conduct outlined in this document. Thank you for upholding our values and helping us to be the best service provider we can be.



Ajit Manocha
PRESIDENT & CEO, SEMI

Introduction

As a matter of fundamental principle, SEMI, a global not-for-profit industry association, must adhere to the highest level of ethical standards. Our members and volunteers support our organization because they trust SEMI to carry out our mission, be good stewards of resources, and uphold the highest conduct standards. Maintaining public trust is core to our being. Therefore, adherence to the law is considered our minimum standard of behavior. SEMI must also

embrace the law's spirit to ensure our actions always align with the public expectations.

SEMI is also committed to ensuring a positive and professional working environment in which all people are treated with respect and dignity. We believe in an open and transparent approach to respect in the workplace and are committed to providing employees with a healthy, positive, and safe work environment.

SEMI Ethical Principles and Core Values

- Honesty
- Integrity & Transparency
- Trustworthiness
- Respect for others
- Adaptability
- Accountability
- Compliance with the law
- Empathy
- Collaboration
- Commitment to the Code of Conduct
- Customer Focus

Decision Making and the Code of Conduct

When making a decision, ask yourself the following:

- Is it legal?
- Does it comply with the SEMI Code of Conduct?
- Does it reflect our company values and ethics?
- Does it respect the rights of others?
- Would I want my conduct and decisions to be made public?
- If you are unsure about any of the answers, ask Human Resources.

Reporting/Speaking Up

SEMI encourages all employees to ask questions, raise issues without fear of retaliation, and is committed to treating reports seriously and thoroughly investigating them, without fear of reprisal.

Employees must report suspected unethical, illegal, or suspicious behavior immediately. The company does not tolerate retaliation against anyone who makes a good faith report of alleged misconduct or otherwise assists with an investigation or audit. Employees who report a concern in good faith will not be subjected to any adverse employment action, including:

- Unfair dismissal, demotion, or suspension
- Unfair denial of a promotion, transfer, or other employment benefits
- Bullying and harassment, either in person or online

- Exclusionary behavior
- Any other behavior that singles out the person unfairly

To report a concern:

- Talk to your manager
- Contact Human Resources at 408-943-6919
- Call the external & anonymous hotline below

You can access the service by visiting the website, through email, or by telephone. This service is available 24/7 and in multilingual (Chinese, Japanese, Korean, Hindi, German, French).

Website: www.lighthouse-services.com/semi

Email: reports@lighthouse-services.com

Toll-free telephone in USA: 877-472-2110

Toll-free in all other countries: 800-603-2869

After a complaint is submitted, Lighthouse will forward the report to the company designees for investigation according to our company policies. Please note that Lighthouse will protect your

identity to the extent possible by law; however, your identity may become known during the investigation because of the information you have provided.

Equal Opportunity

At SEMI, we celebrate and support our differences for the benefit of our company and the industry. SEMI is an equal opportunity employer.

SEMI does not discriminate against any employee or applicant because of race, ethnicity, color, religion, gender, gender identity or expression, age, national origin, sexual orientation, marital status, military service status, pregnancy or related condition (including breastfeeding), disability, LGBTQIA+ identity, or other protected class.

SEMI is committed to supporting a diverse and inclusive workforce, both within the company and the industry. SEMI works to ensure fair and equitable recruitment, hiring, onboarding, retention, promotion, and termination. This includes using inclusive language in communications and publications to provide a sense of belonging.

No Harassment or Bullying

SEMI has a zero-tolerance policy for any form of harassment, including sexual harassment and bullying.

SEMI employees will treat all employees, clients, business partners, and other stakeholders with dignity and respect at all times.

Any type of harassment, including physical, sexual, verbal, or other, is prohibited and can result in disciplinary action up to and including termination.

Harassment can include actions, language, written words, or objects that create an intimidating or hostile work environment, such as:

- Yelling at or humiliating someone
- Physical violence or intimidation
- Unwanted sexual advances, invitations, or comments
- Unwanted comments that reference a person's protected status, such as race, gender, or another identity
- Visual displays such as derogatory, racialized, or sexually-oriented pictures or gestures
- Physical conduct, including assault or unwanted touching
- Threats or demands for submitting to sexual requests as a condition of employment or to avoid negative consequences

Bullying

SEMI is committed to ensuring that our employees, contractors, and customers work in a safe and respectful environment free of bullying. Bullying can include:

- Spreading malicious rumors or gossip
- Excluding or isolating someone socially
- Establishing impossible deliverables
- Withholding necessary information or purposefully giving the wrong information
- Intimidating someone
- Impeding someone's work
- Unfairly denying training, leave, or promotion
- Constantly changing work guidelines
- Sending offensive jokes or emails
- Criticizing or belittling someone constantly
- Tampering with a person's personal belongings or work equipment

Conflicts of Interest

Officers, directors, and employees of the company must never permit their interests to conflict or appear to conflict with the interests of SEMI, its membership/clients, or affiliates. Officers, directors, and employees must be cautious to avoid representing SEMI in any transaction with others with any outside business affiliation or relationship. Officers, directors, and employees shall avoid using their SEMI contacts to advance

their private business or personal interests at the expense of SEMI, its membership/clients, or affiliates.

Employees are required to disclose any relationships, associations, or activities that could create actual, potential, or even perceived conflict of interest to their manager and the SEMI Human Resources Department.

External Communication on Behalf of SEMI

Only SEMI CEO/ President, CFO/VP Operations, and CMO are authorized to represent the company to media and/or legal authorities. Employees

should refer all requests for information or interviews to the SEMI's Chief Marketing Officer.

Confidentiality

The company and its employees maintain the confidentiality of all proprietary information. Proprietary information includes all non-public information that might harm the company and its customers and business partners if disclosed.

Confidential information can include:

- Customer/Client lists
- Supplier lists
- Pricing information
- Terms of contracts
- Company policies and procedures
- Financial statements
- Marketing plans and strategies
- Trade secrets
- Any other information that could damage the company or its customers or suppliers if disclosed

Privacy

SEMI complies with the requirements of the countries where it conducts business as well as international privacy laws. All employees sign an agreement that contains provisions for information confidentiality and non-disclosure.

The company and its employees do not disclose any private, personal information of:

- Employees
- Customers/Clients
- Suppliers
- Competitors
- Third parties

Employees store all personal information securely, mark it as confidential, and store it only for as long as needed for the purpose for which it was collected.

When providing personal information, employees limit access to only those with a clear business need for the information.

Employees are required to report any privacy breaches, including the loss, theft of, or unauthorized access to personal information to their manager.

Fair Dealing

While SEMI competes assertively for new business, relationships with business partners are based upon trust and mutual benefits and compliance to applicable country laws.

Employees are required to:

- Communicate SEMI services in a manner that is fair and accurate and that discloses all relevant information
- Familiarize themselves with the company's fair dealing policies and remain aware of the

consequences of any violation of procedures or laws governing fair dealings

- Use only publicly available information to understand the business, customers, competitors, business partners, technology trends, and regulatory proposals and developments
- Advise their manager immediately of possible violations

Bribery and Facilitation Payments

SEMI will not attempt to influence a person's judgment or behavior in a trust position by paying a bribe or kickback. This applies to individuals in government and private businesses.

The company does not permit facilitation (or "grease") payments to government officials or private businesses to secure or speed up routine actions.

Employees are to:

- Select third parties carefully and monitor them continuously to ensure they comply with the company's anti-bribery policies
- Keep accurate books and records at all times and monitor that funds are not being used for bribery or facilitation payments
- Refuse any offer or request for an unlawful payment and report the incident to the SEMI CFO

Gifts and Entertainment

While gifts and entertainment among business associates can be appropriate ways to strengthen ties and build goodwill, they also can create the perception that they influence business decisions. SEMI is committed to obtaining business only on the merits of its products, services, and people and complies with all legal requirements for giving and receiving gifts and entertainment.

Employees are to:

- Use sound judgment and comply with the law & SEMI policy regarding gifts and other benefits
- Never allow gifts, entertainment, or other personal benefits to influence decisions or undermine the integrity of business relationships

- Never accept gifts or entertainment that are illegal, immoral, or would reflect negatively on the company
- Never accept cash, cash equivalents, or other securities

Employees may accept occasional unsolicited personal gifts of nominal value such as promotional items and may provide customers/clients and business partners with the same.

When in doubt, employees should check with SEMI's CFO before giving or receiving anything of value.

Political Contributions

SEMI does not make political contributions. Employees are free to support any political party or entity on a personal level. However, this must be kept separate from SEMI business

Charitable Contributions

The company may make charitable contributions to causes and organizations that are not politically affiliated. Employees should check with the CFO before making any charitable contributions on behalf of the company.

Record Keeping

SEMI keeps its books, records, accounts, and financial statements thoroughly, fair, accurate, understandable, detailed, and timely.

All SEMI documents, databases, voice messages, mobile device messages, computer documents, files, and photos are company records.

Employees are required to:

- Maintain these records and protect their integrity for as long as required

- Maintain official record-keeping systems to retain and file records required for business, legal, financial, research, or archival purposes
- Dispose of your records according to the company's records retention and disposition schedule
- Employees should never destroy documents in response to, or in anticipation of, an investigation or audit

Protection and Proper Use of Company Assets

SEMI requires all employees to protect its assets. All assets should be used for legitimate purposes, efficiently, and for company business only.

Assets include facilities, equipment, computers and information systems, telephones, employee

time, confidential and proprietary information, corporate opportunities, and company funds.

Suspected incidents of fraud, theft, negligence, and waste should be reported to SEMI's CFO.

Money Laundering

The company complies with anti-money laundering laws. Money laundering is the process of concealing illicit funds by moving them through legitimate businesses to hide their criminal origin.

Employees must never knowingly facilitate money laundering or terrorist financing and must take steps to prevent inadvertent use of the company's business activities for these purposes. Employees are required to immediately report any unusual or suspicious activities or transactions such as:

- Attempted payments in cash or from an unusual financing source
- Arrangements that involve the transfer of funds to or from countries or entities not related to the transaction or customer
- Unusually complex deals that don't reflect a real business purpose
- Attempts to evade record-keeping or reporting requirements

Health and Safety

SEMI is committed to providing a safe and healthy workplace.

The company conducts business following applicable health and safety requirements and strives for continuous improvement in its health and safety policies and procedures.

All employees are expected to perform their work in compliance with applicable health and safety laws, regulations, policies, and procedures

and apply safe work practices at all times in all locations.

All applicable safety and health requirements must be communicated to visitors, customers, or contractors at any company location.

Employees are required to immediately report workplace injuries, illnesses, or unsafe conditions, including "near-misses" Workplace Resources Director or Global Human Resources Director.

Environment

SEMI is committed to minimizing the environmental impact of all its activities to deliver services to our clients.

The company is committed to operating in an environmentally responsible manner, from the provision of products and services to the operation

of its offices and facilities, selection of suppliers, and other business activities.

The company complies with all applicable environmental laws and regulations and self-directed commitments to sustainable practices and environmental protection.

Information Technology

SEMI expects its employees to safeguard all computer equipment and data against intentional malicious acts by individuals inside or outside the company. Cyber-security training is provided to all employees to ensure compliance with computer security policies.

SEMI safeguards against inappropriate access by individuals or groups untrained in correct company policies or procedures.

SEMI does not use software for which it does not have a license.

Internet Use

SEMI understands that occasional personal use of the internet during work hours is a reasonable request and allows this within reason. Employees can ask for clarification from their managers if in doubt.

However, the company does not allow internet users to support a personal business, political venture or embarrass its customers.

Use of Social Media

Social media provides opportunities to network and create exposure for SEMI and our brand. However, there are risks associated with employees' use of it.

Employees are responsible for complying with company policies and procedures when communicating on social media. Employees are accountable for any information they publish online.

Employees are required to:

- Reveal their relationship with the company when commenting online on issues related to the company
- Respect the privacy of other employees and refrain from publishing photos of them without their consent

- Ensure any information they post related to the company is accurate
- Comply with the rules of the social media sites they use

Employees must not:

- "Pretext," or pretend to be someone they are not online
- Speak on behalf of the company if they are not expressly authorized to do so
- Share confidential information about the company, its clients, stakeholders, or suppliers
- Post comments or pictures that could harm the company's brand, reputation, or commercial interests

Corporate Social Responsibility

SEMI understands that corporate social responsibility extends to our entire supply chain. This encompasses the products and services supplied and the human rights, ethics, and social practices of our company and its suppliers.

One goal of the corporate social responsibility procurement program is to build partnerships with like-minded organizations by actively seeking out business partners who are the most environmentally and workforce friendly.

Forced Labor: The company and its suppliers shall employ all employees under their own free will, with no one being subjected to bonded or forced

labor. This policy applies to the supplier's business operations and its supplier network with which the company conducts its business.

Child Labor: The company and its suppliers shall not employ any people under the minimum legal working age of the country in which they work.

The company encourages and supports involvement in the community that has supported it. This includes supporting local business and talent by, for example, sourcing local products and services, where appropriate, and showcasing the work of local artists in the company's public spaces.

Code of Conduct Acknowledgement

By certifying to the SEMI code of conduct, you acknowledge that:

- You have read the entire code of conduct and understand your responsibilities related to it.
- You have had the opportunity to ask questions to clarify any unclear aspects of the code.
- You agree to abide by its principles.
- You agree to report to the company any violations of the code.
- You agree to cooperate in any investigations of violations of the code.

Signature

Date

Printed Name