



Code of Conduct

December 31, 2025



Introduction

BE Semiconductor Industries N.V. (“Beside”, “the Company”, “we”, “us” or “our”) is engaged in one line of business, the development, manufacturing, marketing, sales and service of semiconductor assembly equipment for the global semiconductor and electronics industry. The dynamic environment, of which Beside is part, makes it important that we define our common values. Our common values will provide a uniform response to internal and external challenges so as to meet our business goals and to do this in a right way, with the purpose of creating a sustainable long-term value. Thereto, we have defined our Code of Conduct. This Code of Conduct addresses the responsibilities of the Company towards our employees and other persons working for Beside other than on the basis of an employment agreement and other stakeholders such as customers, suppliers, shareholders and society. Any reference to employees hereafter shall include persons working for Beside other than on the basis of an employment agreement.

The starting point of the Code of Conduct is our mission:

*Beside's mission is to become
the world's leading supplier of
semiconductor assembly equipment for
advanced packaging applications and to
exceed industry average benchmarks of
financial performance.*

Our Core Values

We conduct our business inspired by our mission and driven by our core values. Our core values are the essence of our corporate attitude and provide us guidance in decision making.

Respect

We cherish the richness and broad range of experiences, perspectives, and cultures within our organization. We promote an open culture in which we respect each other's opinion and freely discuss our concerns and give and receive feedback. We respect the promises we make to each other, to our business partners and to our customers.

Unity

Performing in unity gives us a competitive advantage. We optimally utilize the benefits of our collaborative activities when working together and sharing knowledge.



Customer focused

We provide innovative and relevant product solutions and services to the marketplace that meet our customers' needs and exceed their expectations.

What may our stakeholders expect from us?

We recognize that to conduct our business, we are dependent on the trust that different stakeholders place upon us to look after their best interests. Further, we acknowledge that our activities may have an impact on our stakeholders, which we should take into account in doing our business. Below we give an outline on what our stakeholders may expect from us and which we are willing to review in dialogue with such stakeholders. This outline should help to assess the extent of Besi's responsibilities towards its stakeholders.

Employees

Our employees expect Besi to be an employer that respects their human rights and provides good and safe working conditions. We offer our employees competitive terms and conditions of employment as well as an inspiring and inclusive working environment where we continue to invest in our employees' development. Discrimination, harassment or other inhumane treatment towards our employees is not tolerated. We will respect the privacy of all our employees. We will handle personal data responsibly and in compliance with all applicable privacy laws.

Customers

Our customers expect that our products represent a fair and competitive price and quality level combined with a limited environmental impact. In order to build sustainable relationships, we are a trusted party that should keep its promises and communicate openly and proactively with its customers.

Suppliers

Our suppliers expect that we aim to maintain a long-term relationship with them that is based on mutual trust and integrity, compliance with applicable laws, and is therefore mutually beneficial.

Shareholders

Our shareholders expect that we protect their investment and provide a satisfactory return on their investment, while at the same time recognizing that we support a sustainable long term value creation of Besi.

Society

The societies in which we operate expect us to comply with applicable laws and regulations and respect their health, safety and security. Within our ability, we will contribute with our technical knowledge to the education of students. We will keep up with industrial sustainability standards and actively contribute to society by developing (energy) efficient



products in a sustainable manner. We strive to minimize adverse effects of our business activities on the environment.

How we conduct our business

In regard to our employees

Harassment

Everyone has the right to work in a place that is free from harassment, intimidation, (sexual) abuse, and acts or threats of physical violence. We do not tolerate verbal or physical conduct that demeans another person, unreasonably interferes with another's work performance or creates an intimidating, abusive, hostile or offensive work environment.

Non-discrimination

Everyone should treat each other honestly and fairly without regard to the others' race, religion, national origin, political affiliation, gender, gender identity, sexual orientation, age and/or physical or mental disability. All employment decisions at Besi are made on a non-discriminatory basis in accordance with applicable law.

Labour union

Everyone has the right to join a legally recognized trade union to bargain collectively on their behalf with the Company. The Company shall not in any way interfere with the right to join a trade union, nor discriminate against trade union members due to their membership.

Work-life balance

Everyone has the right to a healthy work and private life balance and has a responsibility to guard this balance. Our working hours shall be within what is considered legal, reasonable and common practice within our respective industry and countries of operation.

Positions outside Besi

In order to avoid any (perceived) conflicts of interest, employees cannot occupy any position that can be perceived as contrary to the interest of the organization. This means that employees should not participate as a member of a supervisory board, director, officer, employee, consultant, agent, creditor or lender of, or in any similar capacity in:

- any business which provides services to Besi;
- any business to which Besi sells services; or
- any business with which Besi competes.

Our Conflict of Interest Policy contains requirements for declaring certain types of external positions outside Besi.



Private investments

To prevent any (perceived) conflicts of interest, our employees must not make any financial investments or otherwise make any investment that can be perceived as contrary to the interest of the organization, either directly or indirectly via family members or acquaintances. In order to resolve the issue or to register the concern, such conflicting investments are to be reported to Besi's Compliance Officer. Passive investments in stock in a publicly traded company that may deal or compete with Besi will not violate this policy, as long as the employee owns less than 1% of the outstanding stock of that publicly traded company.

Use of alcohol and drugs at the working place

Our working place and job-related activities should be free from alcohol and illegal drugs. Employees are not allowed to work under the influence of alcohol, illegal drugs or any substance that could prevent from working safely and effectively. Employees also are not allowed to possess or distribute any drugs or alcohol on Besi premises. The only exception is Besi sponsored events where the moderate consumption of alcohol is authorized.

In regard to Company assets

Company assets for private use

Besi's property, information, position or services should not be used for any personal benefit of employees or the personal benefit of anyone else. Employees should not perform outside activities using Besi's property, or perform outside activities that would interfere with an employee's ability to perform his or her job requirements to the fullest.

Because the line between personal and company benefit may be difficult to draw, it is recommended that any use of the organization's property or services that is not solely for the benefit of the organization be approved beforehand by the employee's immediate manager.

Employees should protect the organizations' assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on our profitability.

Confidential information

Besi and its employees will handle confidential information of the organization, employees and others with the utmost care.

Employees must maintain the privacy and confidentiality of information entrusted to them by the Company or its customers and other stakeholders, handle such information with care and caution and not disclose any such information, except for following authorization by a supervisor, or in case it is permitted by the Company's policies, or is made in connection with certain permitted activities. Additionally, employees should take appropriate precautions to ensure that confidential information, whether it is proprietary to Besi or a third party, is not communicated within the Company except to employees who have a need to know such information to perform their responsibilities for the Company. Outside working hours,



employees must practice a Clean Desk Policy in order to protect the privacy and confidentiality of such information as much as reasonably possible.

Intellectual property

Besi's intellectual property rights are valuable assets and all employees are expected to protect them. Employees should also respect the intellectual property rights of others. Intellectual property includes, among other things, patents, trademarks and service marks, domain names, copyrights, design rights, database extraction rights, rights in know-how or other confidential information (sometimes called "trade secrets" or "proprietary information") and rights under intellectual property agreements. Employees are required to understand and comply with all intellectual property laws applicable to our business activities. Any use of Besi's systems in violation of applicable intellectual property rights, such as the illegal or unauthorized duplication or distribution of copyrighted materials, is strictly prohibited.

In regard to external stakeholders

Financial and tax reporting

Our *financial reporting* both inside the Company as well as to our shareholders and stakeholders should provide a clear and precise observation of the nature of the underlying transactions in accordance with Company and (inter-)national accounting standards. To continue to be a reliable organization, employees should avoid all types of behaviour that can result in inaccurate or fictional transactions. No secret or unauthorized accounts shall be kept or created.

Our *tax reporting* should accurately represent the underlying facts, transactions and operations. All relevant information should be provided to the proper tax authorities in our respective countries of operation. Under no circumstance will Besi evade taxation in an unlawful manner.

Reference is also made to Besi's Code of Ethics for Senior Financial Officers and Global Tax Policy, which can be found on www.besi.com.

Insider trading

Sensitive market information is information about our business that is not publicly available and which, if made public, could affect the Company's competitive advantage or the price of the Company's shares. It is very important that employees are aware of the sensitive market information they handle and do so with caution and care. Employees should prevent such information from being made public outside of the Company, unless legally required to do so. Within the Company employees must only share such information with relevant persons on a need-to-know basis.

It is our aim to comply both with the letter and with the spirit of the *insider trading* laws as a reliable organization. It is our policy and responsibility to comply fully with such laws by applying



them in our day-to-day activities. Under no circumstances is any employee allowed to use insider information for personal (financial) benefit.

To the extent applicable, we refer to our Code of Conduct Besi Employees with regard to Insider Information and our Code of Conduct Designated Persons with regard to Insider Information.

Gifts, favors and entertainment

Building up a strong and reliable relationship with our customers, suppliers, stakeholders, and other business partners is beneficial for Besi. In many industries and countries gifts, favors and entertainment are used to strengthen business relationships. In certain cases, because of protocol or courtesy, it may be appropriate to accept an unsolicited gift of insignificant value. However, under no circumstances shall gifts of money or equivalents such as stocks or bonds or other financial assets be accepted or provided. Any gifts that are not of insignificant value should be returned immediately and reported to a supervisor. For all of us there is one clear and general rule: gifts, favors or entertainment cannot be accepted or provided if this leaves the receiver obliged to the provider or appears to do so.

Common sense and moderation should prevail in business entertainment engaged in on behalf of the Company. Employees should provide, or accept, business entertainment to or from anyone doing business with the Company only if the entertainment is infrequent, modest, intended to serve legitimate business goals and is in compliance with applicable law.

As a guideline for determining whether a particular gift, favor, entertainment or other benefit is appropriate, employees should consider whether it would be considered extravagant or excessive, or whether public disclosure thereof would embarrass the Company. This goes for both receiving gifts, favors or entertainment as well as for providing gifts, favors or entertainment.

Corruption and facilitating payments

Employees should not involve themselves in bribery, facilitating payments or any other form of corruption. Employees cannot directly or indirectly pledge a (financial) benefit to any person affiliated with a government or an entity controlled by a government to secure or maintain orders or services. Furthermore, employees are not allowed to use external third parties to get around the ban on corruption. We also refer to our Anti-Corruption and Bribery Policy, available on www.besi.com.

Anti-trust

We should conduct our business in a fair and competitive manner within the existing legislative framework. Anti-trust and competition laws are designed to promote fair and open competition by prohibiting unfair, restrictive or collusive business practices. It is our policy to comply fully with all such laws. In no circumstances should we put our competitors at a disadvantage gained in any way that is contrary to existing anti-trust and competition laws.



Supplier selection

The selection process by which we select and contract suppliers should be conducted in a transparent manner that is devoid of personal or private preferences for any supplier but instead based on objective criteria that are reasonable and fair.

Supplier discount

Accepting personal benefits for preferential treatment from suppliers, such as supplier-discount for private purposes, is not allowed under any circumstances. If any employee is confronted with such offers, he or she is to report this immediately to the Company's Internal Control Department or his or her local HR Department.

Social media

We use various social media channels in a responsible and professional manner for external communications. We should respect our audience and not publish personal, offensive or demeaning language or expressions. We should not disclose private or confidential information nor publish content from other parties without their consent.

Compliance with the Code of Conduct

Comply with the Code of Conduct and the law

We are subject to the laws, rules and regulations of many countries and jurisdictions around the world. All our employees, including all persons working for Besi whether or not on the basis of an employment contract, are expected to comply with the Code of Conduct and applicable laws, rules and regulations. When the Code of Conduct conflicts with applicable laws, rules and regulations, then these prevail over the Code of Conduct. The Board of Management of Besi shall be finally responsible for the proper implementation of the Code of Conduct and for tracking compliance with the Code of Conduct.

Questions regarding compliance?

It is important that it is clear to all of us what is expected from us in our positions as employees of Besi. Should any questions or difficulties arise regarding compliance with the Code of Conduct, employees can contact the Company's Internal Control Department or their local HR department or use Besi's Whistleblower Procedure or Grievance Procedure.

How to act if you become aware of non-compliance?

It is of great importance that (possible) breaches of the Code of Conduct in which Besi employees are involved are known by management. Non-ethical behavior in any form is not allowed and will not be accepted. To be informed on non-ethical behavior, management is to a large extent dependent on the information it receives from our employees and other stakeholders. We urge those who witness non-ethical behavior or those who are victimized by unethical behavior to report this. Below we describe step-by-step how you can report non-ethical behavior.



1. Non-ethical behavior should primarily be reported to your manager.
2. If it is not appropriate or you do not feel comfortable reporting non-ethical behavior to your manager, please get in touch with the Company's Internal Control Department or your local HR department.

Besi's Whistleblower Procedure and Grievance Procedure describe the further possibilities of reporting non-ethical behavior and the procedure in more detail, as well as the rights and obligations of those who are involved in the report. The procedures are available on www.besi.com.