



Corporate Social Responsibility Policy

PHILOSOPHY

Axcelis is committed to the recognition and safeguarding of human rights in all the countries in which we operate. Axcelis' Human Rights Policy is guided by the United Nation's Universal Declaration of Human Rights and is reflective of our Ethical Business Conduct at Axcelis Policy, our Environmental Policy and our commitment to a safe and humane workplace as evidenced in many of our Human Resources policies. At the same time, we respect the sovereignty of nations throughout the world and affirm their primary responsibility to protect their citizens' human rights. We seek to do business with partners - customers, suppliers and contractors - who share the same commitment to human rights that we have.

SCOPE

This policy applies to all Axcelis employees, as well as customers, suppliers, vendors and others with whom Axcelis employees interact in the context of their work. All employees are responsible for complying with this policy, and management will encourage employees to understand the policy and comply with applicable laws related to it. Axcelis expects its suppliers and vendors to confirm their compliance with these human rights commitments as a condition of doing business with Axcelis.

POLICY

Employment Opportunity

All people have the right to be considered for appropriate work, regardless of personal factors, as set forth in our Equal Employment Opportunity Policy, which is applicable to all employees globally.

Compensation

Axcelis will pay employees at least the minimum wages and overtime rates required by law and collective labor agreements and, if no such laws or agreements apply, wages in line with marketplace practices, providing such compensation provides equal pay for equal work and is sufficient to support an existence worthy of human dignity.

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Hours of Employment

Axcelis will comply with applicable laws and rules, and relevant industry practice, governing the hours of work for our employees, providing such hours of work are humane and allow for sufficient rest and maintain safety standards.

Child or Forced Labor

Axcelis opposes the use of child labor at our operations and expects our customers and suppliers to demonstrate similar intolerance for such practices. The term "child" refers to any person under the age of 18. Axcelis opposes all human trafficking and slavery, and forced or compulsory labor.

Prevention of Harassment

Axcelis is committed to providing a work environment free of unlawful harassment. Our Discriminatory and Sexual Harassment Policy sets forth our comprehensive commitment to prevent the various types of harassment.

Anti Corruption

Our Ethical Business Conduct at Axcelis Policy prohibits corruption and the payment or acceptance of bribes or kickbacks, whether or not in a jurisdiction where such actions are prohibited by law. Axcelis expects all employees, regardless of the location of their employment to comply with the US Foreign Corrupt Practices Act and any other rules and regulations forbidding corruption.

Safety

Axcelis believes that all injuries are preventable and that every employee is responsible for injury prevention. Axcelis' safety goal is ZERO incidents and ZERO injuries. Safe behavior is a condition of employment.

In addition, Axcelis' commitment to violence prevention at work is set forth in our Workplace Violence Prevention Policy.

Environmentally and Socially Responsible Supply Chain; Conflict Minerals

Axcelis expects its suppliers to only source materials from environmentally and socially responsible sources.

Specifically, Axcelis will not support any vendor or other entity in its supply chain that extracts or transports minerals (including Tin, Tantalum, Tungsten or Gold) and uses the resulting financial or other resources to fund or otherwise fuel conflict in the Democratic Republic of the Congo, or any other country. Axcelis takes seriously the allegations that some metals mined or

transported by such companies may be making their way into the general industry supply chain and that profits from these businesses could potentially contribute to human rights violations.

Axcelis supports the development of independently verifiable supply chain transactions, when available and credible, to ensure materials are supplied from environmentally and socially responsible sources. Axcelis is committed to building on existing systems and practices to ensure that our suppliers comply with these expectations.

Axcelis expects its vendors to comply with this policy.

OWNERSHIP

Senior Leadership

RELEVANT RESOURCES

Ethical Business Conduct at Axcelis Policy
Discriminatory and Sexual Harassment Policy
Equal Employment Opportunity Policy
Foreign Corrupt Practices Act Presentation
Workplace Violence Prevention Policy
Axcelis ISO 14001 document #9900251 Environmental Policy